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19-8201

No. \_\_\_\_\_

IN THE  
SUPREME COURT OF THE UNITED STATES  
Washington, DC

James R. Householder, Jr. - PETITIONER

vs.

Commonwealth of Pennsylvania - RESPONDENTS

Westmoreland County at CP-65-CR-0004746 C 2012, CP-65-CR-0004747 C 2012 and CP-65-CR-0004748

ON PETITION FOR WRIT OF CERTIORARI TO

The last court that ruled on the merits of my case was the Superior Court of Pennsylvania, Western District, NON-PRECEDENTIAL DECISION - SEE Superior Court I.O.P.65.37, filed on October 23, 2018, dismissing my Appeal.

This is an Appeal from the Denied Petition for Allowance of Appeal on June 10, 2019, in the Supreme Court of Pennsylvania, Western District, with no decision.

CORRECTED PETITION FOR WRIT OF CERTIORARI

James R. Householder, Jr.  
Inmate No. LW-2687  
S.C.I. Greene  
175 Progress Drive  
Waynesburg, PA 15370

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Questions Presented for Review

1. Why did the Supreme Court of Pennsylvania, Western District, Docket No. 474 WAL 2018, not answer any of my questions?
2. Because of the accusers' differences in their testimony, why can't I impeach the accusers' under Rule 609(a), because of their untruthfulness?
3. Was I deprived of my Sixth Amendment of effective counsel, when the accusers' where never questioned about the inconsistencies of what they said happened, where they said things happened and when they said things happened, that were never brought up during my trial that I have shown in the Concise Statement of the Case?
4. Was I deprived of my Fourteenth Amendment of Due Process, when the accusers' where never questioned about the inconsistencies of what they said happened, where they said things happened and when they said things happened, that were never brought up during my trial that I have shown in the Concise Statement of the Case?
5. Did the Superior Court error on page 13, of the Non-Precedential Decision - see Superior Court I.O.P. 65.37, by stating:

By the way of background, during his cross-examination of the victims, trial counsel pointed out several of the inconsistencies that Appellant references.

When in fact my trial Attorney only pointed out 3 of the inconsistencies by the way of background, but never directly

question them about the inconsistencies?

Trial counsel cross-examined E.B. about the first time she discussed the incidents of sexual abuse with S.A. and the timeframe in which S.A. and E.B. indicated they started talking to each other about the incidents. See, N.T. Trial, 8/6/14, at 229, 391.

and the other one was: When S.A. testified that they talked at the Mall. See N.T., Trial, 8/6/14, at 217, 219. And E.B. testified that she never told at the Mall. They talked outside my mom's house in Lower Burrell. See, N.T. Trial at 391.

but they were never directly questioned about the differences.

6. Did the Superior Court error on page 13, of the Non-

Precedential Decision - see Superior Court I.O.P.6537 stating: Trial counsel also cross-examined S.A. as to her testimony that her memory was clear that she had been abused but but that she did not completely remember everything. See id at 235.

That is wrong because if you look on page 235 of the Trial transcripts S.A. says that she remembers everything all the way back to the age of 5.

7. Did the Superior Court error on page 13 of the Non-Preced-

ential Decision - see Superior Court I.O.P.65.37 states: Trial counsel, outside the presence of the jury, also stated that he had a strategy not to ask S.A. about being touched at Swissvale and the discrepancy between being touched with Appellants hands or his penis because it would give her the opportunity to clarify, say more about the incidents, and revisit that attempted rape charge. N.T. Trial, 8/6/15, at 248-49.

That is wrong because if you look on page 248-49 of the Trial that is not what I wanted brought up, it was on page 255 of

the Trial Transcripts on 8/6/14 stating:

Mr. Householder: Simply because she is up there stating she remembers everything clearly and everything else. Here it is, specifically says, S.A., starting in Swissvale you testified (Preliminary Hearing) that these incidents, that you don't think that these things happened, is that accurate. Yes. And you answered honestly that you really don't remember those, correct. Yes.

8. Did the Superior Court error on page 13, of the Non-Precedential Decision - See Superior Court I.O.P. 65.37, bringing up the only inconsistency that the trial Attorney questioned E.S. about

Additionally, trial counsel cross-examined E.S. regarding

Appellant touching her underneath her clothes despite having said he did not previously. See id. at 287-88.

But the Superior Court failed to show how my Trial Attorney neglected to bring up during my Trial other inconsistencies about E.S. saying she seen me doing things to E.B. at E.S's dad's house during the night and how her story changed every time she told it, that I have shown in the Concise Statement of the Case on page 11 and 12?

Also, the Superior Court failed to show how my Trial Attorney neglected to bring up the differences on what E.S. said I did to her at the Mills Mall, changing her story, that I have shown in the Concise Statement of the Case on page 12?

9. When the Superior Court brought up the second and the only other inconsistency that my Trial Mr. Cecchetti questioned the accusers' about stated on page 12 of the Non-Precedential Decision - See Superior Court I.O.P. 65.37 stating:

(indicating that S.A.'s testimony showed that it was true both that the assaults continued after her cast was removed and that she at times fought back and prevented Appellant from touching her), point 5 see N.T. Prelim. Hr'g, 12/4/12, at 64

Did the Superior Court error because they failed to show how S.A. told the Detective that S.A. broke her ankle on 7/4/2008 and she said NOTHING HAPPENED between them after she got her cast off, Householder tried to ASSAULT HER ONCE MORE. S.A. REFUSED to be assaulted, at that point the ASSAULTS STOPPED to her knowledge? (Police Report #12-298 page EB5 on 08/21/12)

10. Did the Superior Court error by saying (E.B. testified that she was assaulted at the Lower Burrell House) and point 8, see N.T. Trial, 8/6/14 at 235

because there were differences in what E.B. said she saw, she told the Detective that I was rubbing E.B.'s and S.A.'s breasts and vaginas during the night. But at the Preliminary Hearing she said I just rubbed S.A.'s breasts and kissed her? As I have shown in the Concise Statement of the Case on page 9 and 10.

11. Was I deprived of my Fourteenth Amendment of due process, when my Trial Attorney talks about the police reports on more than one occasion and does not submit them into evidence as I have shown on page 9 of the Concise Statement of the Case?

About E.B. telling the officer that she told S.A. at the Mills Mall. And another time that my Trial Attorney brought up a police report and did not admit it into evidence about when S.A. said the assaults stopped when she broke her ankle (Jury Trial Aug. 4-8, 2014) page 391 and page 244 and 245)

12. Why did my Trial Attorney ask E.B. on when and where she talked to S.A. about the assaults. by the way of background, but never directly questioned E.B. about the inconsistencies, or any other inconsistencies that I have shown in the Concise Statement of the Case on page 9, 10 and 13?

13. On page 8 of the Non-Precedential Decision - See Superior Court I.O.P. 65.37 state:

Appellant raises the following questions for our review.

Why did the Superior Court neglect to answer the question about the Assistant District Attorney Judith Petrush

committing Prosecutorial Misconduct, that I have shown in the Concise Statement of the Case, page 10 and 11?

14. Why on page 14 and 15 of the Non-Precedential Decision - See Superior Court I.O.P.65.37 state:

Claims of inconsistent statements must be proven by evidence of record or else claims of ineffectiveness that are based on a witness's alledged inconsistent statements are not properly reviewing court?

But did not answer my question on how this deprives my of my Fourteenth Amendment of due process?

15. Why on page 15 and 16 of the Non-Precedential Decision - See Superior Court I.O.P.65.37 state:

However "the police reports were not admitted in to evidence and (Begley) failed to provide...any other factual evidence" to support the claims. Id. Thus, the claims failed for lack of arguable merit.

Because I have shown evidence of record that shows untruthfulness through the Jury Transcripts, the Preliminary Hearing Transcripts and the Police reports to show untruthfulness, does this not deprive me of my Fourteenth Amendment?

JURISDICTION

On June 10, 2019, my Petition for Allowance of Appeal Was denied in the Supreme Court of Pennsylvania, Western District, with no decision.

Which was Appealed from the Superior Court of Pennsylvania, Western District, Non-Precedential Decision - SEE Superior Court I.O.P.65.37 on October 23, 2018.

The jurisdiction of this Court is invoked under 28 U.S.C. §1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOKED

Pa. R. Evid. 613(a) Witness's prior inconsistent statement to impeach. A witness may be examined concerning a prior inconsistent statement made by the witness to impeach the witness's credibility.



Sixth Amendment - to be confronted with the witnesses against him, to have the assistance of counsel for his defense.

Fourteenth Amendment - All persons born or naturalized in the United States and subject to the jurisdiction thereof are citizens of the United States and of the State wherein they reside. No State shall make or enforce any Law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

Cross-examination is a vital and fundamental part of a fair trial, providing the principal means by which the believability of a witness and the truth of his or her testimony are tested.

In criminal cases, this right extends beyond the subjects testified to on direct examination, and includes the right to examine the witness on any facts tending to refute inference or deductions arising from matters testified to on direct examination.

...to test the witness's memory and perceptions, but the cross-examiner has traditionally been allowed to impeach or discredit the witness's story. (Commonwealth of Pennsylvania, Appellee v. John Thomas Spiewk, jr. appellant Supreme Court of Pennsylvania 533 Pa. 1; 617 A.2d 696; 1992)

Evidence is relevant if it logically tends to establish a material fact in the case, tends to make a fact at issue more or less probable, or supports a reasonable inference or presumption regarding the existence of a material fact. Evidence that merely advances an inference of a material fact may be admissible, even where the inference to be drawn stems only from human experience. (Commonwealth of Pennsylvania, Appellee v. Dawn E. Hawk, Appellant. Supreme Court of Pennsylvania 551 Pa. 71; 709 A.2d 373)

The sufficiency of Evidence - In evaluating a challenge to the sufficiency of the evidence, we must determine whether viewing the evidence in the light most favorable to the Commonwealth as the verdict winner, together with all reasonable inferences therefrom, the trier of fact could have found that each and every element of the crimes charged was established beyond a reasonable doubt.

We may not weigh the evidence and substitute our judgment for the fact finder. To sustain a conviction,

however, the facts and circumstances which the Commonwealth must prove. Must be such that every essential element of the crime is established beyond a reasonable doubt. (Commonwealth of Pennsylvania, Appellee v. Market Priest, Appellant, Superior Court of Pennsylvania, 2011 PA Super 85; 18 A.3d 1235)

The well standard of review in judging the sufficiency of the evidence is whether, when viewing the evidence in a light most favorable to the Commonwealth as the verdict winner and drawing the proper inferences favorable to the Commonwealth, the tier of fact could reasonably have found that all of the elements of the crimes were established beyond a reasonable doubt.

Any doubt regarding a defendant's guilt may be resolved by the fact finder unless the evidence is so weak and inconclusive that as a matter of law has no probability of fact may be drawn from the combined circumstances. (Commonwealth of Pennsylvania v. Jesse Smoot 2015 Pa. dist. Cuty Dec. Common Pleas Court of Bucks County, Pennsylvania, Criminal Division)

#### CONCISE STATEMENT OF THE CASE

The A.D.A. Mrs. Petrush stated:

Ladies and Gentlemen, you are not going to hear any forensic evidence in this case. The testimony of the victims alone, if believed by you, is sufficient to convict. (Jury Trial Aug. 4-8, 2014 page 94)

S.A. testified a the Jury Trial: Q. And since your memories are clear you've testified to what you remember occurring in Swissvale at age 5? A. Yes. Q. For instance you testified under oath today that your father only touched you in Swissvale with his hands? A. Yes. Q. Correct? A. Yes. (Jury Trial Aug. 4-8, 2014 page 234)

But at the Preliminary Hearing, in Swissvale S.A.'s testimony was different. S.A. testified that her father used his hands and his penis. (Preliminary Hearing Dec. 04, 2012 page 13)

also: Q. S.A., starting in Swissvale you testified that these incidents, that you don't think that these things happened, is that correct? A. Yes. Q. And you answered honestly that you really don't remember though. Correct? A. Yes. (Preliminary Hearing Dec. 04, 2012 page 42)

S.A. testified: Q. And what kind of touching do you recall at the living room in Arnold?

A. Um, the same thing as Swissvale, like he rubbed his penis on my butt, my vagina. (Preliminary Hearing Dec. 04, 2012 page 21)

But S.A. testified differently at Jury Trial:  
Q. Now, you remember events as well in the city of Arnold that your father touched you? A. Yes. Q. And he touched you where on your body? A. My vagina. Q. Anywhere else other than your vagina? A. No. (Jury Trial Aug. 4-8, 2012 page 235 and 236) Q. Do you know if he inserted his penis into your buttocks? A. No, he didn't. (Jury Trial page 238)

Then S.A. testified that the assaults continued at the Lower Burrell house:

S.A. began to fight off Householder, she recalled that she broke her ankle on 7/4/08. She was in a cast until September 2008 and NOTHING HAPPENED between them after she got the cast off, Householder tried to assault her ONCE MORE. S.A. refused to be assaulted and told Householder that she was going to tell her mother at that point the assaults STOPPED to her knowledge. (Police report #12-298 page EB5 on 08/21/12)

But at the Jury Trial S.A. testified: Q. But your recollection is, after the cast was removed he did touch you again? A. Yes. Q. With what, his hand or his penis or what? A. His hand, his penis and his mouth. (Jury Trial Aug. 4-8, 2014 page 244)

S.A. changed her story to coincide with E.B.'s:

The detective asked S.A. if she knew about an incident that E.B. described about her and S.A. having their breasts rubbed by Householder at different times during the night. He also asked S.A. about an incident where she and E.B. were sleeping on the air mattress at his mother's house and Householder climbed between the two of them as they were sleeping? He began rubbing their vaginas. Thus waking E.B. S.A. DIDN'T RECALL. (Police report #12-298 page EB5 on 08/21/2012)

At the Jury Trial S.A. testified: Q. Okay, did you ever tell E.B. about what the defendant had done to you? A. Yes. A. Okay, we were at the Mall, just me and her, and she -- we sat down for a break, and she said weird things were happening to her, between her and the defendant, and I was shocked and I told her that the same things were happening to me. (Jury Trial Aug. 4-

8, 2014 page 217 and 219)

But E.B. testified: Q. Also, the first time that you said anything to anyone about this incident was to S.A., wasn't it. A. Yes. Q. And where did you tell S.A.? A. At the Lower Burrell house, outside. Q. And how old were you at the time? A. Probably about 13 years old. Q. Did you ever tell this officer that you told S.A. at the Mills Mall? A. No. I never told at the Mall. (Jury Trial Aug. 4-8, 2014 page 391)

The weird thing is that E.B. did not tell the detective that her and S.A. talked at the Mall.

Not only did E.B. and S.A. get the place wrong about the incidents but they couldn't get the year right. As I showed on top of this page, E.B. testified she was 13 which would have made S.A. 12, because S.A. testified:

Q. Now, the time you talked to E.B., when was that? A. That was probably 2010, 2011 when I was 15 and I believe she was 16. (Jury Trial Aug. 4-8, 2014 page 229)

Now, E.B. says she seen Householder doing things to S.A. but her story changes every time she tells it.

E.B. told Detective Scott Cardenas she recalled another incident about 1 year ago a Householder's mother's house on Hilltop Drive in Lower Burrell. Once again E.B. and S.A. were asleep on the air mattress in the living room. Householder was in his room. E.B. told me that Householder crawled onto the air mattress between the girls. E.B. woke to feel Householder rubbing her vagina over her clothing. He was doing the same thing to S.A. simultaneously. (Police report #12298, page EB2 08/20/12)

At the Preliminary Hearing E.B. testified:  
Q. Did you see anything happen to S.A. or anybody else besides yourself at that house in Lower Burrell?  
A. Just S.A., nobody else. Q. What did you see happen to S.A. there? A. I have just seen her being touched on her boobs, and him trying to kiss her, but I understand she was his daughter, so I didn't think that was weird but I still protected her. (Preliminary Hearing Dec. 04, 2012 page 64)

And her story changed again at the Jury Trial:

Q. On any of these occasions that you say that you saw things happening to S.A., were things happening to you also? A. Yes. On the same incident? A. Yes. Q. Tell us about that? A. I woke up one time he was touching S.A. underneath her shirt on her breasts and on top of her pants, and he was doing the same thing to me. He would go back and forth between us. Q. And where did that happen? A. At the Allegheny Township house in the living room. (Jury trial Aug. 4-8, page 367)

But S.A. testified: Q. Now, were you assaulted by your father while at the Allegheny Township apartment? A. Not to my knowledge. (Jury Trial Aug. 4-8, 2014 page 261)

Other differences S.A. made: S.A. told Detective Scott Cardenas that Householder made her disrobe in front of him on at least two separate occasions. (Police report #12-298 page EB5 on 8/21/12)

But S.A. changed her story at the Preliminary Hearing: Q. Did he ever have you remove clothing yourself? A. No. (Preliminary Hearing Dec. 04, 2012 page 30)

And the same at the Jury Trial: Q. I'm going to ask you to look at the question that was put to you and your answer at the preliminary hearing. Q. Did he ever have you remove your clothing? A. No. (Jury Trial Aug. 4-8 2014 page 242)

I don't understand why my trial attorney asked this but never brought up the fact that S.A. told the detective that Householder made her disrobe on at least two separate occasion?

The differences in E.B. testimony; Q. Was that always in the room where the air mattress was located, the living room? A. Yes. Q. And did anything bad happen to you in any other room in that Lower Burrell house? A. No. (Jury Trial Aug. 4-8, 2012 page 353)

But at the Preliminary Hearing E.B. testified; Q. Did it happen again in the living room at the Lower Burrell house? A. A couple times, yes, and we switched from in the living room upstairs to like the finished basement downstairs. Q. And what happened in the basement? A. Same thing. (Preliminary Hearing Dec. 04, 2012 page 61)

The A.D.A. Judith Petrush committed prosecution misconduct and deprived me of my Fourteenth Amendment by objecting to E.S.'s testimony:

Q. Now, the times that you were at your home that you saw things being done to S.A. and E.B., what were some of the things that you witnessed Jim doing to S.A.? A. Just grabbing her chest, pretending to play around. Just touching her inappropriately. Q. And you saw that? A. Yes.

Q. What did you see him do to E.B.? A. The same thing. Q. Was this during horse play or was this on a mattress when they were sleeping? A. Both. (Jury Trial Aug. 4-8, 2014 page 289)

Q. If S.A. said she was not touched at your residence in Natrona and you say she was, are you mistaken?

---

Mrs. Petrush: And I would object to that, because I don't think that's what S.A. testified to. I think she indicated that she could not recall whether she was or not and-

Mr. Cecchetti: If somebody said they don't recall being touched - I'll withdraw every thing. (Jury Trial Aug. 4-8, 2014 page 290 and 291)

Mrs. Petrush was wrong because S.A. did testify that at the Sederas residence that I did not horse play with her.

Q. But at the Sekeras residence, you also saw horse play? A. Yes. Q. And did he horse play with you? A.No. (Jury Trial Aug. 4-8, 2014 page 263)

And Trial Attorney Mr. Cecchetti deprived me of my Fourteenth Amendment of due process by withdrawing every thing after the objection by Mrs. Petrush. :

When E.S. describes what she seen me do to E.B. it is different every time she tells her story.

E.S. told Detective Scott Cardenas that; E.S. remembered that the girls were asleep on two beds, E.B. S.A. and E.S. were on one bed. E.S. said she woke during the night and found Householder asleep in the bed also, next to E.B., who was asleep, Householder had his hand on E.B.'s breasts. (See arrest report 20121116m001 page 4 of 4)

At the Preliminary Hearing E.S. testified;

Q. Did you ever -- we talked about E.B. and S.A. Did

you ever see anything going on with them or -- A. Yes.  
Q. -- him do anything weird with them? What did you see?  
A. I'd seen him grabbing E.B. the one night when I woke  
up in the middle of the night, he was sleeping with her.  
Q. Where was that? What room? A. Upstairs. Like he was  
between was holding her. Q. he was holding E.B.?  
A. Yes. Q. Did you see what part of her body was he hold-  
ing on to? A. Her back. Q. Had he -- when you went to  
sleep, had he been between you guys when you went to sleep?  
A. Yes. Q. So you knew he was there? A. Just the one  
time. (Preliminary Hearing Dec. 04, 2012 page 87 and 88)

Then E.S.'s story changed again at Jury Trial:

Q. Okay. And what about when you girls would be  
sleeping? Did you see anything whenever you were sleep-  
ing? A. Occasionally he would sneak into the bed, and I  
woke up in the middle of the night the one time he was  
passed out drunk. Well, not necessarily passed out, but  
he was touching E.B. while she was sleeping. Q. What did  
you see? A. Grabbing her butt and her crotch. (Jury  
Trial Aug. 4-8, 2014 page 281 and 282)

On redirect by Mrs. Petrush; Q. E.S., thinking  
back on the occasion that you recall seeing the defendant  
Jim, up against E.B. Q. -- what parts of her body do  
you recall him touching that occasion? A. Her back and  
her butt. Just it was night. Q. Okay. So, do you recall  
on that occasion him also touching her chest? A. I  
couldn't tell you that. (Jury Trial Aug. 4-8, 2014  
page 299 and 300)

When E.S. tells her story about what happens at the Mall,  
she can't get her story straight.

E.S. told Detective Scott Cordenas; E.S. related  
that Householder would take her and the other girls to  
the Pittsburgh Mills Mall on several occasions. E.S.  
said that Householder began horse playing with her at the  
mall. She described it as Householder pushing her, then  
grabbing her by the breasts as he did so. (see arrest  
report 20121116M001 page 4 of 4)

E.S.'s testimony at the Preliminary Hearing;

Q. Any location out in public or anything? A. Yes.  
Q. Where was that? A. The one time at the Mall. Q. And  
which mall was that? A. The Pittsburgh Mills. Q. And  
what happened there? A. Like I felt him grab my butt.  
(Preliminary Hearing Dec. 04, 2012 page 86)

At the Jury Trial E.S. testified: Q. Well, did

anything occur that he touched you inappropriately at the Mills Mall when you went with him and S.A.? A. Yes. Q. What did he do? A. He would just grab you and hold you. Not like grab you and hold you in a manner that anyone can ever notice. It's just friendly kind of thing. Q. Where did he grab you? A. Just my butt. Q. Okay. A. And he held on to my waist. (Jury Trial Aug. 4-8, 2014 page 295)

The only inconsistency that my Trial attorney questioned

E.S. about was;

Q. And when he touched you, did he ever touch you underneath your clothes? A. Yes. Q. And where would he touch you underneath your cloths? A. He would hold my stomach. He would fondle me. Q. Just on your stomach? A. On my breasts, too. Q. were you wearing a bra at the time he touched you on your breasts? A. Yes. Q. Did he go on top of the bra or underneath the bra? A. Both.

Q. Do you remember testifying at the preliminary hearing? A. Yes. Q. And you were under oath at the time? A. Yes. Q. Just like you are under oath now? A. Yes. Q. So, again, do you remember being asked, did he ever touch you underneath your clothing on any parts of your body? Yes. Q. And what was your answer? A. No. (Jury Trial Aug. 4-8, 2014 page 287, 288 and 289)

This shows that E.S. committed perjury, along with the accusers with their inconsistencies and conflicting statements.

Another dishonest thing that was said by E.B. under oath;

At the Preliminary Hearing E.B. testified;

Q. And isn't true that he was suppose to take you and your boyfriend to Kennywood? A. He was, because we were going to go see S.A. and L.H. for their band. Q. At some point he didn't take you; he told you he's not taking you? A. Correct. Q. And you got upset, correct? A. I did. Q. That was -- the Kennywood trip was suppose to occur right before you initially had the breakdown and went to the police, is that correct? A. Yes. (Preliminary Hearing Dec. 04, 2012 page 76)

E.B.'s story changed at the Jury Trial;

Q. Do you recall an incident in which Jim was suppose to take you to Kennywood? A. Yes. Q. He did not take you to Kennywood, did he? A. No. Did you get upset? A. No. (Jury Trial Aug. 4-8, 2014 page 382 and 383)



### Reasons for Granting the Petition

The intermediate appellate Court has erroneously entered an order quashing or dismissing an appeal.

I was deprived of my Sixth Amendment of the U.S. Constitution by the accusers' not being directly questioned about the inconsistencies and conflicting statements and testimony.

I was deprived of my Fourteenth Amendment of the U.S. Constitution, by the accusers' not being directly questioned about the inconsistencies and conflicting statements and testimony.

The Superior Courts states that I am saying that my Trial Attorney was ineffective for not introducing the police records but now I am saying that it deprives me of my Fourteenth Amendment of the U.S. Constitution.

I have shown factual evidence of the conflicting and inconsistent testimony through the Jury Trial, The Preliminary Hearing and Police Reports, of the accusers' statements.

Under Rule 609(a) I want the accusers' testimony impeached.

There was no forensic evidence in my case, only testimony of the accusers' alone.

The inconsistencies show fabrication, bias, improper influence and faulty memory.

My Trial Attorney Gregory Cecchetti only brought up 3 inconsistencies by the way of background and 2 by direct questioning.

If you say that the accusers' were directly questioned about the inconsistencies and they gave a reasonable answer, then show in the Trial Transcripts that it was done, because

if you say that my Concise Statement of the Case, is not true,  
in any way, than you must prosecute me under the charge of  
18 USCS § 1001.

The accusers' testimony was suspect and unreliable.

The verdicts are against the weight of the evidence.

The sufficiency of the evidence shows no credibility of  
the accusers' testimony.

Therefore, the convictions should be reversed and the  
sentence should be vacated and I should be released from prison  
or granted a new Trial.

#### CONCLUSION

The Petition for a Writ of Certiorari should be granted.

Respectfully submitted,



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January 26, 2020