

19-8279

SUPREME COURT OF THE UNITED STATES

FILED
JUN 10 2020
OFFICE OF THE CLERK
SUPREME COURT, U.S.

JEFFREY LAGASSE

Vs.

Case No. 19-8279

MARK S. INCH

PROVIDED TO  
JEFFERSON C.I.

JUN 10 2020

FOR MAILING *PL*  
RECEIVED BY *PH*

**MOTION TO RECONSIDER 5/26/2020 DENIAL OF**

**PETITION FOR WRIT OF CERTIORARI**

If any concept is fundamental to our American system of Justice – it is that those of whom have been given the distinguished honor of upholding the law, be able to separate the law from their own personal preferences and/or any other bias of which may contaminate the purity of their (originally) well intentioned goals... So when the officer of whom admittedly falsified the documents in this case --- revealed that the petitioner was a “complete stranger” at the time in which he was falsifying the petitioner’s documents --- in what predicament did that leave the other 8999 “complete strangers” of whoms life this officer had either influenced at the time of the above interview<sup>1</sup>, and/or has continued to influence since? See Brown v. Miller, 519 F.3d 231 U.S. App 5<sup>th</sup> Cir (2008).

Just because the above officer’s crimes may never be seen by millions of viewers (like the recent events of which have caused major upheaval in our nation’s cities) does not mean that his actions are any less “un”-ethical, yet this officer (of whom swore under oath that this case was allegedly the “only” case where—in he has ever gone astray) has been allowed

<sup>1</sup> Details of all above claims can be found in the petitioner’s 4/2/2020 petition for writ of certiorari in this court

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to continue wreaking havoc on the structure of (potentially) thousands of families since he originally committed these crimes nearly 20 years ago... Please see writ for the breakdown of these specifics.<sup>2</sup>

Please review these 3 clear cut issues in their purest form...

**Ground 1:** Tampering contaminates the purity of the evidence leaving jurors to wonder exactly where the (actual) evidence stops and the meddling begins... **Public Servants (whether in the lime light or behind the scenes) should recuse themselves if they cannot regain their direction** and if they lack the intestinal fortitude to make such an admission they must be weeded out, thus reminding everyone that a public servants burden is "Not" for the faint of heart but for **those of whom are capable of upholding the law the way it is written, not as they wish that it was.** Please review ground 1 for reconsideration.

**Ground 2:** When a jury reaches a Guilty verdict despite the alleged victim saying --- "That's NOT Him" – the contamination (from trying these separate cases together) has reached the point of saturation thus compelling the jury to base their decision on a "propensity to commit" crimes rather than "proof of offenses." See Jones v. State, 945 So.2d 536 (Fla. 5<sup>th</sup> DCA 2006)... This is textbook, a reliable outcome cannot be reached in this case without the severing of these charges...

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<sup>2</sup> The petitioner can only imagine the backlogged dockets created by the Covid 19 shutdowns and prays that this Court can somehow find the tenacity amidst the chaos to consider that unethical behavior by any public servant is "not" okay whether the accused is Black (or White) and/or whether their improprieties are on camera or behind the scenes.

“Fairness takes precedence over efficiency, convenience and judicial economy.”

See Dodge v. State, 204 So.3d 490 (Fla. 4<sup>th</sup> DCA 2016). Please review Ground 2 for reconsideration.

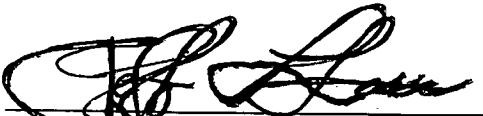
**Ground 3: Withheld adjudication for crimes committed “before” July 1999**

**“Could Not” be used for habitualization and withheld adjudication for crimes committed “After” July 1999 “Could.” Had the petitioner known (in 1999) that the conditions under which he took that plea would “not” be met, he would never have taken that plea.<sup>3</sup> See Hill v. Lockhart, 474 U.S. at 59, 106 S.ct 366 (1985). Please review Ground 3 for details and reconsideration.**

#### CERTIFICATE OF SERVICE

I HEREBY SWEAR that a true and correct copy of the foregoing has been furnished to the Office of the Attorney General at: 444 Brickell Avenue. Suit 650 Miami, Florida 33401

On this 10<sup>th</sup> day of June 2020.



Jeffrey LaGasse, FDOC, No. 680445  
Jefferson Correctional Institution  
1050 Big Joe Road  
Monticello, Florida 32344

\* See 7/17/20  
Addendum  
(attached) →

<sup>3</sup> The petitioner is appealing to this Honorable Court --- praying that there is somebody out there of whom will protect a “prose litigant’s” federal constitutional rights.