

Case No. 19-8665

In The
SUPREME COURT OF THE UNITED STATES

Term 2020

Anthony Jackson, *Petitioner*,

v.

Supreme Court of Illinois, *Respondent*,
M.R. 030370

**On Petition for Writ of Certiorari to
Issue to the Illinois Supreme Court**

**Motion To Expedite Conference Scheduled for September 29, 2020 for Consideration Of
The Petition For A Writ Of Certiorari, To Expedite Merits Briefing And Oral Argument In
The Event Petition is Granted, And To Expedite Consideration Of This Motion**

Pursuant to Supreme Court Rule 21, Petitioner Anthony Jackson respectfully moves this Honorable United States Supreme Court to expedite its consideration of both the petition for a writ of certiorari to the Supreme Court of Illinois and this motion.

To that end, Petitioner offers potent brevity, conciseness and directness, well understanding that if compelling reasons do not sway this Supreme Court, expanded wordiness will not prove persuasive.

Petitioner's Compellingly Surreal Case

For 2,044 days as of August 20, 2020, Petitioner Anthony Jackson has continuously been detained on first-degree murder charges. Petitioner has repeatedly demand trial and requested to be released on bond, all to no avail. He has remained in jail without a trial, over his numerous

objections for nearly 6 tortious years. He is serving time for a debt he does not owe as a mere pretrial detainee.

On March 16, 2013, Petitioner awaited a train while standing on a train platform armed with his briefcase containing his study sheets on which he gently placed a bottle of tea. Petitioner was headed to a University to study for final examinations, gleeful that he was getting a jump in his family competition with his collegiate daughters for the best grades. The Deceased stared at Petitioner and approached him caustically as Petitioner turned his back, unaware of the Deceased's approach. Words were exchanged and they fought, hand-to-hand. Afterward, Petitioner frantically implored to watching travelers that the Deceased was, "acting crazy" and threatening to attack or kill him.

Unbeknownst to Petitioner, indeed the Deceased was a mental patient, one with a deep history of unprovoked violence. Minutes before the fight, the Deceased's nursing home residence violated mental health protocol by allowed him to leave the facility because he was hyper agitated and aggressive to staff and other residents (through no fault of his own, mind you). A former nursing home employee witnessed the Deceased's barely controlled aggression to an elderly staff member that morning. The former employee confirmed, by sworn affidavit, her observations and that the Deceased was supposed to be detained.

More disturbing, 21 days before the fight the Deceased self-reported to a mental health unit of a hospital that he was a "danger" to others and was "snapping" on people. A mental health professional diagnosed the Deceased as homicidal and suicidal, and confined him to a locked mental institution for 7 days. Hence, 14 days before the fight the Deceased was released from a locked mental institution because he was homicidal and suicidal.

Petitioner has not been allowed to present any of this information to a jury. He has not been allowed to defend himself. In the first trial, the Cook County State's Attorney's Office concealed from the defense *all* of this information about the Deceased and his challenges with unprovoked aggression. The Deceased's history echoes Petitioner's claims immediately following the fight when Petitioner did not know or have any way of knowing the Deceased's mental plight into unprovoked aggression. Counsel for Petitioner, a former decorated Assistant United States Attorney, used his Department of Justice honed investigative skills along with Petitioner to uncover the truth about the Deceased, which truth he uncovered despite the Judge refusing for months to provide Counsel with a HIPAA Qualified Protective Order to obtain mental health records the Deceased through he gave one to the prosecutors.

As passionately as we can muster, we implore this honorable Supreme Court to expeditiously allow Petitioner to defend himself armed with more than a briefcase chock full of tattered study sheets and a bottle of tea; armed instead with the truth previously hidden by the prosecutors.

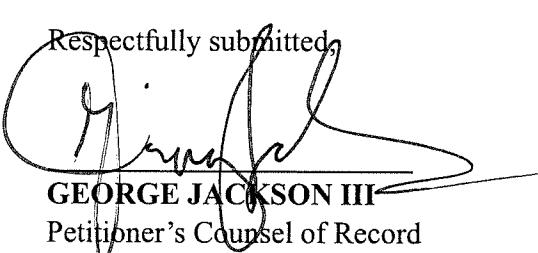
National Misuse of Blanket Tolling Order

There is a judicial epidemic of chief judges entering orders purporting to toll the speedy trial terms of all criminal case within its respective districts, but which cases were not individually before the Chief Judges. The Judges thus lacked jurisdiction for the orders, thus making the orders *void ab initio*. The Illinois Supreme Court enters three such Orders, which Petitioner challenges here on appeal. If this Court grants certiorari and voids these orders, many, many criminal defendants portend freedom for speedy trial violations.

Additionally, use of ends-of-justice language to purport to toll speedy trial terms is ineffective because that language is unconstitutionally broad, as explained in greater detail in the Petition for Writ. This is yet a mother basis for criminally charged defendants to walk free based on speedy trial terms. This problem grows exponentially as time elapses and more speedy trial terms expired due to infirm purported tolling orders.

AUGUST 20, 2020
DATE

BY:

Respectfully submitted,

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