

20-5182
No. _____

ORIGINAL
Supreme Court, U.S.
FILED
JUL 27 2020
OFFICE OF THE CLERK

IN THE
SUPREME COURT OF THE UNITED STATES

JESSE WILLIAMS PETITIONER
(Your Name)

vs.

BRYAN K. KIELLS — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

U.S. COURT OF APPEAL FOR FOURTH CIRCUIT

~~(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)~~

PETITION FOR WRIT OF CERTIORARI

JESSE WILLIAMS
(Your Name)

P.O. BOX 1058
(Address)

BURGAW N.C. 28425
(City, State, Zip Code)

(Phone Number)

LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

BRYAN K. KIELLS P.O. BOX 1058 BLUR GALUNI. C. 28425
N.C. ATT. GEN. CLARENCE J. DELFORGE P.O. BOX 629 RALEIGH
N.C. 27602

RELATED CASES

TABLE OF AUTHORITIES CITED

CASES	PAGE NUMBER
DE' LANTA V. ANGELONE, 330 F.3D 630, 633 (4TH CIR. 2003)	4
HAINES V. KERNER 404 U.S. 519 520 (PER CURIAM)	4

STATUTES AND RULES

RULE 18 U.S. SUPREME COURT

28 U.S.C. § 1254(2)

N.C.G.S. 14-7.1

N.C. RULES OF ASSEMBLY OF STATUTES

3

OTHER

JURISDICTION

For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was MAY 6, 2020.

No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the United States Court of Appeals on the following date: JULY 6, 2020, and a copy of the order denying rehearing appears at Appendix D.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

For cases from **state courts**:

The date on which the highest state court decided my case was _____. A copy of that decision appears at Appendix _____.

A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A.

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

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

8TH AMENDMENT DUE PROCESS CLAUSE AND EQUAL PROTECTION CLAUSE.

N.C.G.S. 14-7a1

N.C. RULES OF ASSEMBLY OF STATUTES REQUIRE ALL STATUTES TO BE ASSEMBLED FROM EXISTING STATUTES.

STATEMENT OF THE CASE

~~DISTRICT COURT CITED CURABLE DEFECTS IN PRO-SE
2254 HABEAS IS TIME BARRED AND ORDERED DISMISSAL,
FAILING TO LIBERALLY CONSTRUE HABEAS OR ALLOW FAIR
AMENDMENT OPPORTUNITY.~~

~~DELONIA V. ANGELONE (330 F.3D 630, 633 (4TH CIR. 2003) COURT
LIBERALLY CONSTRUED PRO-SE COMPLAINT.~~

~~PETITIONER'S CUSTODIAN FAILED TO PROVIDE A LAWN
LIBRARY OR PARA-LEGAL TO ASSIST HIM IN PREPARING
HIS 2254 HABEAS.~~

~~PETITIONER CLAIMED ACTUAL INNOCENCE AND COURT
FAILED TO OFFER HIM TOLLING.~~

~~HAINES V. KERNER, 404 U.S. 519, 520 (PER CURIAM)
(PRO-SE COMPLAINT HELD TO LESS STRINGENT STANDARDS
THAT FORMAL PAPERS DRAFTED BY LAWYERS).~~

REASON FOR GRANTING THE PETITION
N.C. LEGISLATURE WAS BARRED BY 5TH, 8TH AND 14TH AM.
LI. S.C. FROM ASSEMBLING (4) CRIMINAL STATUSES
INTO N.C.G.S. 14-7.1.

SINCE N.C.G.S. 14-7.1 WAS UNLAWFULLY ASSEMBLED
IT MAKES THE ENHANCED SENTENCE UNCONSTITU-
TIONAL.

ALL N.C. HABITUAL FELON CONVICTIONS SHOULD
BE VACATED, BECAUSE N.C.G.S. 14-7.1 IS PATENTLY
UNCONSTITUTIONAL.

REASONS FOR GRANTING THE PETITION

~~DISTRICT COURT FAILED TO LIBERALLY CONSTRUE PROSE
HABEAS OR ALLOW FAIR AMENDMENT OPPORTUNITY.~~

~~PETITIONER WAS DENIED ACCESS TO COURTS, WHEN CUSTODIAN
FAILED TO PROVIDE PARA-LEGAL OR LAW LIBRARY TO ASSIST
HIM IN PREPARING HABEAS.~~

BS

CLUSION

The petition for a writ should be granted.

Respectfully submitted,

X Jose Williams

Date: APRIL 9, 2020