

No. 20-5566
BOLD

IN THE SUPREME COURT OF THE UNITED STATES
WASHINGTON, DC 20543-0001

JOHN J. WILSON, JR.
Appellant / PETITIONER

vs.

THE Hon. STEVEN J. LEVIN, Circuit
Court Trial JUDGE FOR THE
WINTERHAT ^{JUDICIAL} Circuit ^{AND FOR} MARTIN
County, FLORIDA; MARTIN-
DADE County, ET AL.

Appellees / Respondents

PETITION FOR REHEARING TO
PROCEED ^{ITALICS} IN FORM ^{PROPER}

^{ALL-CAPS} COMES NOW, Appellant / PETITIONER, ^{ITALICS}

^{ALL-CAPS} JOHN J. WILSON, JR., PURSUANT
TO RULE 44 OF THIS COURT, TO

GRANT HAVE TO PROCEED
AI-CAPS
IN FORMS PREPARED AND
ITALICS

Provided To Tomoka CC
On 11/25/22
For Mailing, by JW

IN SUPPORT THEREOF WOULD SHOW
THE FOLLOWING:

(1) ITALICS PETITIONER AI-CAPS Wilson IS

CURRENTLY FALSELY IMPRISONED
AT TOMOKA CORRECTIONS INSTITUTION AI-CAPS

IN DAYTONA BEACH, FLORIDA,
ON AN UNCHARGED CRIME, AS
A RESULT OF BEING FORCED TO
REPRESENT HIMSELF AT TRIAL

TO AVOID BEING ^{APPOINTED} THE SAME CONFLICTED
ATTORNEY ~~IN EFFECTIVELY~~ ~~OR~~ AND/OR
DEFICIENTLY REPRESENTING

AI-CAPS Wilson IN OTHER CASES ~~OR~~

BEFORE THE SAME TRIAL COURT OF

MIAMI-DADE COUNTY, FLORIDA. SEE
APPENDIX J.

SEE STATE OF FLORIDA L.T. CRIMINAL
CASE NO(S) ^{BOID} FIS-6748, ^{BOID} FIS-1084,
AND ^{BOID} FIS-1083. SEE APPENDIX 'A'.

(2) THE UNDERLYING CIVIL COMPLAINT ^{AND APPLICANTS}
^{er} ^{INSTRUCTION WAS} ~~NOT~~ FILED ON SINCE FEBRUARY
OF 2018, ~~WAS~~ ^{YET} FILED PURSUANT TO
RULE 1.610 OF THE FLA. R. CIV. P.
AND § 768.28 FLA. STAT. ^{IN MIAMI-DAD} AGAINST ^{WHERE PETITIONER WAS IMPRISONED AT THE TIME}
MIAMI-DAD COUNTY AS A JURISDICTION
BASED ON MATERIAL EVIDENCE
"TORTURE" AS DEFINED UNDER PROVISIONS
OF C.A.T., i.e. CONVENTION AGAINST
TORTURE, (WAS ~~REPORTED~~ EXACTED)
ON ^{PRE-TRIAL} ~~PETITIONER~~ ^{APL-CHOP} WILSON IN THE
DETENTION FACILITIES AND CONFINED
OF MIAMI-DAD COUNTY, FLORIDA
TO PREVENT (1) ^{A JURY} ~~TRIAL~~ (2) TO ^{EXPOSURE THE FACT OF THIS CASE}

(4)

INDUCE "PLEAS", ~~AND~~ (3) OBSTRUCT
^{ALL-CAPS}
WILSON'S / LAUFU / ACCESS TO THE

COURTS OF THE UNITED STATES;
~~AND~~ ~~AND~~ (4) ^{FROM} PREVENT HIM RETAINING
~~FROM~~ PRIVATE COUNSEL, OR

APPOINTMENT OF ~~THE~~ A CONFLICT -

~~THE~~ PUBLIC DEFENDER, ~~AND~~ AND (5) ~~AND~~

OBSCURE EVIDENCE OF SEXUAL
ASSAULT ^{FROM ENTERING THE RECORD OF} ^{APPEAL NARRATIVE OR} A COMPETENT
SEE APPENDIX B. COURTROOM

SEE HAWES V. KERNER, 404 U.S. 519 (1972), AND CASEY V. GIBSON,
255 U.S. 41 (1957) ("ALL ALLEGATIONS

MADE BY ~~THE~~ PRO-SE PLAINTIFF

ARE CONSIDERED TO BE TRUE"; "PRO-SE
PLEADINGS ARE TO BE VIEWED BY A LESS STRINGENT STANDARD."
SEE MONELL (CITY : MONELL V. DEPT

OF SOCIAL SERVICES OF THE CITY OF NEW YORK,
438 U.S. 659 (1978). SEE APPENDIX 'A'.

(3) Instruction ^{pursuant to rule 1.160 of the Fla. R.C.} was also filed

against same attorney that ^{Mrs} represented Wilson on Direct Appeal (3D15-2083),
SEE Wilson v. State, 2019 So. 3d.

^{Simultaneously} AND 441 (Fla. 3rd DCA 2018), THAT WAS
DEFICIENTLY ~~and~~ REPRESENTING HIM
IN THE SAME L.T. CASE (FIS-1083),
AS WELL AS OTHER ^{LIT.} CASES (FIS-6748)
IN THE SAME TRIAL COURT,

INVOLVING THE INSTANCES OF
"TORTURE" THAT ENCOMPASS THE
CIVIL RIGHTS CLAIMS, BASED ~~ON~~ ON
~~THE~~ VIOLATIONS OF PRE-TRIAL
ALL-CAPS Wilson's
DETAINMENT ~~AND~~ ^{8TH} Amendment ~~RIGHTS~~

CONSTITUTIONAL RIGHTS, UNDER THE

"CRUEL AND UNUSUAL PUNISHMENT" CLAUSE
(SEE APPENDIX C)
FILED ~~AND~~ PURSUANT § 768.28 Fla. STAT.

IN CONJUNCTION w/ INSTRUCTIONS IN MARION COUNTY, FLORIDA

SEE ECF #93 & COLLATERAL 42 U.S.C.
§1983 COMPLAINT NO. 1-16-CV-20657-KMW,
CORROBORATING ALL FACTS AND EVIDENCE.
SEE MONELL, Id.

(6)

SEE APPENDIX B: ~~THE MONELL CASE~~

(4) THIS "MONELL CLAIM," AGAINST

MIAMI ^{ALL-CAPS} - DADE COUNTY, BY AND

THROUGH ^{ALL-CAPS} DANIE J. ALFONSO, CITY MANAGER,

AND THE Hon. ^{ALL-CAPS} BEATRIZ SOTO,

CHIEF JUDGE OF THE ELEVENTH CIRCUIT
OF MIAMI - DADE COUNTY,

^{ALL-CAPS} CHARLES B. WHITE, ESQ. FROM OTHERS

Palm Beach County, ~~ET AL~~ ~~OTHERS~~ WAS

FILED IN THE L.T. CIRCUIT COURT
OF MARTIN COUNTY IN FEBRUARY

OF 2018, BUT HE'S PULLING SINCE
THE ~~CONF.~~ INSTANT APPLICATION

AND COMPLAINT WERE FILED

INCLUDING FEL APPOINTMENT OF COUNSEL

THE SOLE REASON CITED BY THE

FOURTH DISTRICT OF PALM BEACH COUNTY IN

7

FOR DENIAL OF ^{all-caps} MANDAMUS

ITS OPINION ISSUED in 4D20-0028.

'THAT' ^{all-caps} WILSON IS BANNED FOR [Any]

FURTHER [Filings for Relief

UNLESS REPRESENTED BY COUNSEL,"

WHILE THE L.T. COURT HAS FAILED

TO RULE ON THIS EXACT MOTION,

EFFECTIVELY PRECLUDING

^{all-caps} WILSON'S LATER "ACCESS TO -

-THE COURTS ^{OF FLORIDA} FOR POST CONVICTION

RELIEF FOR my KONT, ^{IN LIEU OF HIS FALSE} ^{SEE IMPRISONMENT}

APPENDIX 'E' AND 'G'. SEE ART. V § 3 ^{ON} ^{AN} ^{UNCHARGE} ^{CRIME}

b(3) OF THE FLORIDA CONSTITUTION. "A

COURT'S DECISION INVOLVING [THE]

WITHDRAWAL OR DISCHARGE OF COUNSEL

IS [SUBJECT TO REVIEW FOR ABUSE

OF DISCRETION." WEAVER V. STARK,

894 So.2d 178, 187 (Fla.2004). SEE

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Fla. n. App. p. 9, 410(a) : SANCTUARY
COURT'S OWN MOTION, "EMERGENCY
SUSPENSION FILED PURSUANT TO
RULE 3-5.2 OF THE FLORIDA BAR."
SEE § 2244(a)(1)(B) OF THE FED. R.
APP. P. "STATE IMPEDIMENT TO
ACCESS - THE COURTS BY A
STATE ACTION." EX PARTE HULL,
312 U.S. 546 (1941), AND JOHNSON
V. MCKEY, 383 U.S. 483 (1969).
SEE APPENDIX A' AND B'. SEE THE
NOTED IN THIS CASE FOR THE COURT'S
DUE DILIGENCE BY INVESTIGATION
OF THE FACTS SURROUNDING THE
CASE. ANDREWS V. UNITED STATES,
373 U.S. 334 (1963).

~~(S)~~ TO WIT,

(5) TO THE CONTRARY OF RULE 39.8

AND THE COURT'S DENIAL FOR ^{ITNICS} PETITIONER

TO PROCEED, IT WAS ACTUALLY ^{AT-CAPS} CHARGED

^{all-caps} G. WHITE THAT FILED AN UNAUTHORIZED

WRIT PETITION ON BEHALF OF ^{ITNICS} PETITIONER

ON April 13th, 2020 UNDER ^{BOLD} No. 19-8247.

SEE APPENDIX 'B'.

(6) ^{all-caps} WHITE VIOLATED THE SUPREME COURT

OF FLORIDA'S ^{all-caps} STAY ORDER IN DIRECT

APPEAL ^{BOLD} NO. 3D15-2653, EFFECTUALLY

RENDERING SUPREME COURT PETITION ^{NO. SC18-21}

FILED PURSUANT TO 9.120(d) UNAUTHORIZED,

AND THEREFORE THIS COURT'S DENIAL

OF WRIT PETITION ^{BOLD} NO. 19-8247

MOOT, IRRESPECTIVE OF THE

ADVERSE DISCIPLINARY INVESTIGATION

PENDING AGAINST ^{all-caps} WHITE WHEN

IN THIS COURT

HE FILED, IN VIOLATION OF RULE 8
OF THE CUR. See Appendix 'B'

(7) AS EVIDENCED BY APPENDIX
FILED IN ^{BOID} (N1.20-5566), ^{ALL CAPS} WILSON
MADE EVERY EFFORT ^{HUMANELY} ~~TO~~ POSSIBLE

TO NOTIFY THE COURT OF THIS
UNAUTHORIZED FILING AS SOON

HE WAS MADE AWARE OF IT; TO WIT,

IT WAS FILED WITHOUT ^{ALL CAPS} WILSON'S

KNOWLEDGE OR CONSENT; AND

IT WAS A ^{PATENTLY} FRIVOLOUS FILING, ^{MISSTATING MATERIAL FACTS} EXCLUDING AN

REQUIRED ^{ALL CAPS} APPENDIX TO BY THIS

COURT TO HIDE THE FACT ^{ALL CAPS} ~~DE~~ WHITE

HAD NEVER FILED FOR REHEARING

IN ^{BOID} (3D15-2653), VIOLATING THE

SUPREME COURT OF FLORIDA'S

^{ALL CAPS} STAY ORDER ON THE DIRECT APPEAL.

SEE APPENDIX 'E' : EVIDENCE
PETITIONER SOUGHT ^{TO DISCHARGE} THIS ATTORNEY
IN THE SUPREME COURT OF
FLORIDA AS EARLY AS
NOVEMBER ^{BOLD} 22ND, 2016 THROUGH
ITS OWN FILING FOR HABEAS CORPUS.
SEE DIRECT CONFLICTS IN SEMINAL
~~STANDING CASE~~ ~~JOHNSON~~ JOHNSON V. STATE,
974 So.2d 363 (Fla. 2008), AND LOGAN
V. STATE, 846 So.2d 972 Fla. (2003);
SEE KNOWLEDGE DENIAL OF PETITION
NO. SC18-3 ^{IN THE SUPREME COURT OF FLORIDA} IN LIEU OF THESE
FACTS CONSTITUTING ALL-CAPS MANIFEST
INJUSTICE.

(8) MAY ALL JUDICIAL AUTHORITIES
BE ADVISED ON THE PREMISES, ITALICS PETITIONER
FILED FOR PETITION FOR WRIT OF

(AI-CAPS)
 MANDAMUS MULTIPLE TIMES IN
 THE SUPREME COURT OF FLORIDA
 FOR THE RESULTS OF PENDING
 BAR^{INVESTIGATION} AGAINST CHARLES G. WHITE, ESQ.
 WITHOUT ANY OF THESE FELONY'S
 BEING DELETED OR ACKNOWLEDGED BY THAT COURT
 THE SAME PROBLEM OCCURRING
 IN THE LOCAL JURISDICTION OF
 MIAMI-DADE COUNTY, FLORIDA
 SEE APPENDIX 'H'; SEE
 REPORT OF THIS MATTER BY THE
 INVESTIGATIONS DIVISION OF THE
 D.O.J. SEE APPENDIX 'F'. SEE ECF#34 OF LIT.
 (9) ^{TRUE AND FULLY DOCUMENTED} THE FACTS ARE (WHITE) (IKI) TO CASE NO. 16-6372 FILE
 BOI IN THIS COURT
 THE FLORIDA BAR IN ITS INVESTIGATION
 OF THE MATTERS AT ISSUE, ^{IN THIS CASE} BY SORTING
 THE 140 FETTERED CERTIFICATIONS OF
 IN DIRECT APPEAL NO. 3D15-2653,
 CONFLICTS PURSUANT TO 9.33C OF THE

Fla. R. App. P. ^{TITUS} AND ^{ALL-CAPS} MISREPRESENTED
HIS ^{ALL-CAPS} ~~HAD~~ ^{ATTENDED} ~~CRAL~~ ^{ARGUMENT}
ON ^{MI. CAPS} ~~SEPTEMBER~~ ^{BEFORE THE THIRD} ~~12TH~~ ^{DISTRICT} ~~2018~~
^{IN FACT,} HE ~~FAILED~~ TO APPEAR. THIS HAS

NOTHING TO DO WITH ~~BEING~~ ^{RETURNED} ~~INDEXES~~
BEING 'MALICIOUS' ^{AS DEFINED PURSUANT TO} ~~THE~~
RULE 39.8 - TO THE CONTRARY, THERE
ARE THE ^{PLAIN} ^{TRUTH} ^{OF} THE FACTS OF THE CASE AS
ESTABLISHED BY THE FLORIDA

^{AS PRESENTED} ~~BAR~~
^{ALL-CAPS} (90) Wilson Titus SEeks TO HAVE
THIS ~~COURT'S~~ ^{COURT'S} DECISION ~~RESCINDED~~
TO ALLOW HIM TO PROCEED ^{IN FORMA PAUPERIS}
IN KEEPING WITH THE FACTS OF
THE FLORIDA BAR'S INVESTIGATION,

AND RULE 8 OF ~~THIS~~ ^{COURT} FOR THE L.T.
COURT OF MARTIN COUNTY ~~IS~~ ^{IS} COMPELLED TO RULE ^{ON} ~~WILSON'S~~ ^{WILSON'S} MOTIONS FOR
~~AND~~ ^{AND} MAY ALL JUDICIAL AUTHORITIES ^{APPOINTMENT} ^{OF}
BE ADVISED OF THE ANTECEDENT ^{COUNSEL} ^{THROUGH} ^{ISSUANCE}
BY THE FOURTH DISTRICT ^{ALL-CAPS} ^{OF} ^{MARTIN COUNTY}

CASES FILED BEFORE THIS
COURT ~~AND~~ BY ^{ITALICS} PETITIONER
PRO SEC, ^{SINCE 2016} ~~IN~~ INVOLVING THESE SAME
ISSUES, NEVER WAS ^{BEFORE} ~~WILSON~~ DENIED

HIS RIGHT TO PROCEED ON FILING
FOR CERTIORARI IN THIS COURT ^{STATES FORM PROPERLY}

^{WILSON} ~~DATE~~ ^{SEE} ~~BACK TO~~ CASE NO. 16-6372 ^{BOLD}
^{WILSON} ~~THIS RULING WOULD GO AGAINST THE COURT'S PREVIOUS RULINGS TO ALLOW~~
^{ALL-CAPS} ~~ALL-CAPS~~ TO PROCEED IN ALL
^{WILSON} ~~ALL-CAPS~~ ^{ALL-CAPS} CASES ^{PREVIOUSLY} ^{BEFORE}

^{WILSON} ~~ALL-CAPS~~ ^{ALL-CAPS} ~~ALL-CAPS~~ ^{ALL-CAPS}
NOW REFUSES TO RETURN ANY DOCUMENT
OR RECORD PERTAINING TO

HIS CASES: F15-1083; F15-1084;
F15-6748; 3D15-2683. OR ^{THIS COURT'S} ^{DECISION}

^{BOLD} NO. 19-8247 ^{FILING IN THE FUTURE} ^{WILSON} ^{ALL-CAPS}
IS AWARE, THIS FILING FAILED
TO CONTAIN ^{BOLD} APPENDIX AS

REQUIRED BY THE RULES FOR
FILINGS IN THIS COURT, AND THE

CASE WAS DENIED ~~ALSO~~
ON THAT BASIS ALONE.

(12) NOW, THE SUPREME COURT OF
FLORIDA REFUSES TO DOCKET OR
ACKNOWLEDGE ANY FILING FOR
ALL-CAPS MANDAMUS REGARDING THIS BAR
COMPLAINT. SEE EXHIBIT 'B' AND 'F'.

Q20.

(13) SAME AS IN ~~THE FILING OF~~ ^{THE FILING OF} MANDAMUS FOR THE L.T.
~~THE FILING OF~~ ^{COURT OF MARTIN COUNTY} ~~AS~~ ^{PER} RULE
NO. 80-3566 ^{IN} ~~FOR~~ ^{APPOINTMENT} ~~FOR~~ ^{OF} THIS COURT'S REVIEW, ~~THE~~ ^{COUNSEL}
THE STATE FILINGS FOR ALL-CAPS MANDAMUS
WERE ~~RESTRICTED~~ ^{RESTRICTED} TO ~~STATE~~ ^{ONLY}
THE FACTS, THE OBJECTIVE

VARIANTS BEING NEITHER
BOID + ITALICS MALICIOUS NOR BOID + ITALICS FRIVOLOUS, LIMITED
TO ONLY THE POINT OF THE COURT'S

MINISTERIAL DUTY TO ISSUE RULING ON
APPOINTMENT OF COUNSEL, OR RESULTS OF FLORIDA BAR

(16) "MANDAMUS RELIEF IS REQUIRED WHEN THE SHOWING OF RIGHT TO THE WRIT IS CLEAR AND INDISPUTABLE" RE BEI SOUTH CORP. 334 F.3d 941, 953 (11th Cir 2003).
"A FACT IS MATERIAL IF IT HAS THE POTENTIAL TO AFFECT THE OUTCOME OF THE CASE." SHAW V. CITY OF SELMA, 884 F.3d 1093, 1098 (11th Cir 2018).

(14) HERE, THE FOURTH DISTRICT OF PAM, (CITATIONS ~~BEFORE CASE OMITTED~~)
BREARLY COUNTY (MISSTATED) ITS TRUE
REASON ^{AND PURPOSE} FOR DENIAL OF MANDAMUS
IN NO. 4/120-0028 TO PREVENT
THE FACTS OF WILSON'S ^{CIVIL} COMPLAINT
AND CONSTITUTIONAL VIOLATIONS OF
HIS CRIMINAL CASES ^{TAKING PLACE IN MIAMI-DADE COUNTY,} FROM COMING
TO LIGHT, ^{THROUGH THE ENTIRE PHASE OF A CIVIL TRIAL} ~~BEFORE THE COURT~~

~~WARRANT~~
(15) ~~THE JURISDICTION~~ ^{ALL-CAPS} CHARLES WHITE AND
THE JURISDICTION OF THE STATE OF FLORIDA
^{NOW} ARE USING MALICIOUS/FRIVOLOUS ^{CLAIMS} AS A
FALSE REASON TO ~~VIOLATE~~ ^{VIOLATE} THE RULES
OF COURT, AND ^{ITALICS} PETITIONER'S
CONSTITUTIONAL RIGHTS.

(16) TO THE CONTRARY OF THE COURT'S DECISION TO
DENY ^{ITALICS} PETITIONER LEAVE TO PROCEED, IT

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WAS ^{ITALICS} ~~PETITIONER~~ ^{ALL-CAPS} (Wilson) WHO CITES

A CAUSE OF ACTION FOR INJUNCTION
AGAINST MIAMI-DADE COUNTY, BASED

ON ^{BOLD} FALSE IMPRISONMENT, ^{BOLD} MALICIOUS

^{BOLD} PROSECUTION. SEE 18 U.S.C. § 1572(a)(3);

SEE HARTMAN V. MOORE, 547 U.S. 230, 265,

126 S. CT. 1695 (2006); SEE pg. 11 OF

APPENDIX 'A'. SEE ^{ALL-CAPS} PAMBAUR V. CINCINNATI, 475 U.S. 469 (1986).

(17) THE NAMED ^{ALL-CAPS} DEFENDANTS OF THE

UNDERLYING INSTANT CLAIMS ARE TO ^{STAY} ^{IN} ^{THE} ^{CLAIMS} PREVARICATING FALSE REASONS ~~AND~~

A CONCERTED EFFORT TO SIDE-STEP

EVIDENCE OF THE FRAUD COMMITTED TO

DENY ^{ALL-CAPS} (Wilson) CONFLICT-FREE COURSE,

THEN COURSE / THAT DECEIT. OF ALL PEOPLE,

^{ALL-CAPS} (Wilson) VISITED THIS ^{WAS} ~~WAS~~ NOT IN ALL

ACTUALITY THE CASE, BUT THE RECITED FACTS

HELD IN AN OBJECTIVE 1/19/41,

(18)

1 TELL A DIFFERENT STORY. SEE

APPENDIX 'C' AND 'D'! SEE ALSO

CORROBORATING FACTS IN APPENDIX 'E'

AND 'G' FROM INTERNAL E-MAILS FROM

THE INTERNAL AFFAIRS UNIT OF THE

MINN-APPA POLICE DEPT DATING

BACK TO 2013 ^{PRINTED} ~~OUT~~ ^{UN/} FROM

WILSON'S CONFLICT-FREE PUBLIC

DEFENDER, MR. ^{ALL-CAPS} JEREMY TRANSA.

SEE THE ACTUAL FALSIFIED TRANSCRIPT

DEPICTING THE ^{ALL-CAPS} JANUARY 2014 PROCEEDINGS

MISREPRESENTED AS THE ^{ALL-CAPS} MAY 2014

PROCEEDING IN CASE NO. FLS-1085 THROUGH

COPY-~~AND~~-PASTING BY ^{ALL-CAPS} APPEX TO

OBSCURE THE FACT MR. ^{ALL-CAPS} TRANSA 1441

HAD ORDERED TO FABRICATE A

"CONFLICT" TO DEPRIVE ^{ALL-CAPS} WILSON COUNSEL.

SEE ECF #1 OF COLLATERAL 4/2

U.S.C. COMPLAINT NO. 1-16-CV-2387/-

MBC, WITH THE ~~ALTERED~~ ~~PROCESSED~~

TRANSCRIPT ^{DOCUMENTS} ~~THE~~ FILED.

(18) ATTORNEY ^{ALL CAPS} WHITE ^{ALL CAPS} REKNOWLEDGES THE FRAUD "AJS MISTAKES" IN THE RECORD, DESPITE COMPLETE

OMISSIONS OF OTHER MATERIAL AND MOTIONS

PROCEEDINGS ^{ALL CAPS} INDICATING ^{ALL CAPS} WILSON.

^{ALL CAPS} WHITE ^{ALL CAPS} REKNOWLEDGES FILED MANY MOTIONS

TO CORRECT OR SUPPLEMENT THE RECORD OF ^{BOID} (3D15-2653), PURSUANT

TO RULE 9.200 ⁽¹⁾ OF THE FLA. R.

APP. P. ^{DESPITE HIS OWN ADMISSIONS.} ^{ALL CAPS + BOID} CONCLUSION

(19). SEE 28 U.S.C. § 1915(e)(1) DETAILED CAUSE IN LIGHT OF "EXCEPTIONAL CIRCUMSTANCES" CHOOSE FOR THIS COURT'S AFFIRMATIVE

(20)

^{All-caps} GRANTING OF ^{All-caps} MANDAMUS FOR
PULLING ON ^{All-caps} WILSON'S MOTIONS FOR
APPOINTMENT OF COUNSEL / ON
MARION COUNTY, FLORIDA, BASED
ON ^{All-caps} WILSON'S LONG EVIDENCED
INABILITY TO "MEETS-THE-COURT"
OF FLORIDA ON HIS OWN. SEE
BASS V. PERRIN, 170 F.3d 1312, 1320

(1st Cir. 1999). HERE, ^{ITALICS} PETITIONER'S DEFT OF FUNDS
TO HAVE A CONFLICT FREE ATTORNEY IS BEING USED
~~AS~~ AS A SWORD TO FALSELY IMPRISON HIM.

(20) ^{ITALICS} PETITIONER VOCIFEROUSLY AGREES
WITH THE COURT'S ASSESSMENT
THAT ~~WILSON'S~~ THE FILING, ~~OF~~
AND/OR LACK THEREOF, WOULD
QUALIFY AS BOTH ^{ITALICS + BOLD} FRIVOLOUS AND
^{ITALICS + BOLD} 'MALICIOUS' AS DEFINED UNDER
RULE 39.8. BUT FROM THE ~~ORDER~~

OPPOSITE way around --
AS THE VICTIM OF HIS OWN,

shows
1 UNWEAIGHED TO THE MERITS OF
His Claims. He was AFTERALL PERMITTED TO
(21) Wilson PROCEEDED I.F.P. IN THE UNDERLYING CIVIL
Complaint WHICH THE COURT IS USING TO BASE
its
DECISION
IN
MARTIN
COUNTY
FLORIDA
THE PARTIES ACCURATELY OR
CORRECTLY LISTED, BUT
THE FACTS ~~ARE~~ AS STATED ^{in all pleadings} ~~ARE~~ STAND
CERTAINLY TRUE AND CORRECT.

SEE HAWES V. KERNER; CONLEY V. GIBSON,
Id. SEE EXHIBIT 'C' AND 'D'.

(22) THE PRESS DICTATE THE ^{OBJECTIVE} TRUTH;
AND THE TRUTH IS NOT PRETTY TO
LOOK AT IN THE PARK SOME TIMES.
BUT SOMETIMES, THE TRUTH IS
NECESSARY ~~AND WE HAVE TO LEAVE TO~~
FOR LEAVE TO

(23) Wilson's MOTION TO PROCEED in
this ACTION FOR REVIEW ^{FOR} MAJINUS SHULD
RE ALL - CPS RE 1966 ACT SEE 18 U.S.C. § 3006A

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411-CAP + BOLD

INDEX TO APPENDICES

(24) ^{BOLD} APPENDIX 'A': "Motion for Certificate of Appealability," Filed in Central Federal Habeas Action pursuant to 28 U.S.C. § 2254 Evidencing ~~MINAMI ACTS EVIDENCING~~ Appellant's inability to "access-the-Court(s)" of Florida ^{By and} through the withholding of conflict-free counsel ~~By~~ through ~~MIAMI-DADE County~~ Defendant's criminal prosecutions within the Jurisdiction of Miami-Dade County, Florida. (See pg. 2 of 13) "FABRICATED CONFLICTS [By] THE MIAMI-DADE County PUBLIC DEFENDER AND OFFICE OF Regional Counsel." (See ^{BOLD} Ground 2 at pg. 9). See ^{BOLD} Ground 3 at

pg. 11: ^{BOLD} Malicious prosecution, FALSE
^{BOLD} IMPRISONMENT, AS A BASIS FOR THE
CLUE OF ACTION FILED IN MARTIN
County, pursuant to § 768.28 Fla. STAT
AND RULE 1.610 OF THE Fla. R. CIV. P.,
IN ORDER "TO ACCESS THE COURTS"
OF FLORIDA. SEE HARTMAN V. MOORE,
547 U.S. 250, 265, 126 S. CT. 1695 (2006).

(25) ^{BOLD} APPENDIX B: EXHAUSTION OF ADMINISTRATIVE
REMEDIES, AND EVIDENCE OF FLORIDA
BAR INVESTIGATION PENDING AGAINST
ATTORNEY ^{ALL CAPS} CHARLES G. WHITE WHILE
CIVIL INJUNCTION WAS PENDING
AGAINST HIM AT THE TIME THE
FILED UNAUTHORIZED WRIT IN
~~THIS~~ ~~COURT~~ THIS COURT UNDER CASE
NO. ^{BOLD} 19-8247, ON ~~MAY 13, 2020~~ ^{MAY 13, 2020} ~~MAY 13, 2020~~ IN VIOLATION OF

Rule 8 of the Court. ~~REDACTED~~

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~~APPENDIX~~ ^{BOLD} APPENDIX 'C': EVIDENCE OF

"TORTURE" AS DEFINED UNDER
provisions of C.A.T. (Convention
Against Torture), AND "IMMEDIATE-
THREAT TO LIFE OR PERSON" IF
REMAINED BACK INTO THE CUSTODY
OF MIAMI-DADE COUNTY FOR
ANY POST-CONVICTION RELIEF

SOUGHT, in violation of ~~DEFENDANT'S~~ ^{PETITIONER'S} 8TH AMENDMENT
^{BOLD} RIGHTS.

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^{BOLD} APPENDIX 'D': SEPARATE AFFIDAVIT

FILED IN THE DISTRICT OF COLUMBIA
CIRCUIT PURSUANT TO RULE 65
OF THE FED. R. CIV. P. BASED ON
"IMMEDIATE THREAT TO LIFE-
OR-PERSON" AS A RESULT OF
MIAMI-DADE COUNTY'S FAILURE

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TO RULE IN THE UNDERLYING
INSTANT CASE, FOR WHICH
MANDAMUS WAS FILED, RESULTING
IN NO. 20-5566^{BOLD}, SEE F.I.S.A.

PETITION, THE HON. ^{ALL-CAPS} ROSEMARY

^{ALL-CAPS} COLLYER.

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^{BOLD} APPENDIX 'E': EVIDENCE ^{ALL-CAPS} WILSON

FILED TO DISCHARGE ^{ALL-CAPS} CHARLES G.

~~WHITE~~ AS EARLY AS NOVEMBER 22ND,

^{BOLD} 2016 IN THE SUPREME COURT

OF FLORIDA, RENDERING ^{DISMISSAL} ~~DECISION~~

OF CASE NO-SC18-3 ~~AT THAT~~ ON

MARCH 6TH, ^{BOLD} 2018 AS IPSC FARE

CASE OF ^{BOLD} MANIFEST INJUSTICE,

PURSUANT TO JOLLISSON V. STATE, 974 So.2d.

363 (Fla. 2008), AND Logan V. STATE,

846 So.2d 472 (Fla. 2003).

(29) ^{BOLD} APPENDIX 'F' : EVIDENCE OF

JUDICIAL MALFEASANCE IN TRANSFERENCE
OF CASES FROM THE SUPREME COURT
OF FLORIDA, TO THE ELEVENTH
JUDICIAL CIRCUIT OF MIAMI-
DADE COUNTY, FLORIDA, AND THE
D.O.J.'S INVESTIGATIONS DIVISION
REFERRING THE MATTER TO
THE ADMINISTRATIVE OFFICE
OF THE UNITED STATES COURTS,
1 COLUMBIA CIRCLE, NE, WASHINGTON,
D.C. 20002.

(30) ^{BOLD} APPENDIX G : NOTARIZED FORMAL
COMPLAINTS ~~RE~~ UNLAWFULLY ASSIGNED
COUNSEL, ^{ALL-CAPS} CHARLES G. WHITE, OF PALM
BEACH COUNTY, FLORIDA, AND ~~THE~~ STATE
OF FLORIDA TRIAL JUDGE FOR CASES

No. ^{BOD}F15-1083, ^{BOD}F15-1084, AND ^{BOD}F15-6748,
INVOLVING TORTURE ~~IN~~ WITHIN THE
DETENTION FACILITIES OF FLORIDA,
INCLUDING THE ^{ALL-CAPS}~~PRISON~~ TREASURE
^{ALL-CAPS} COAST FOREST TREATMENT CENTER,
NAMED AS DEFENDANT IN THE
UNDERLYING STATE CIVIL TORT CASE,
BY AND THROUGH ^{ALL-CAPS} CORRECT CARE, LLC,
THE ~~PLAINTIFFS~~ ATTACHED PLEADINGS TO
CHIEF JUDGE, THE HON. BEVITA
SOTO, OF THE ELEVENTH JUDICIAL
CIRCUIT OF MIAMI-DADE COUNTY,
FLORIDA ~~RE~~: THESE SAME CASES
DATE BACK TO ^{JUNE 3RD,} 2015, WHEN
BEFORE TRIAL OF THE CASE
RESPONSIBLE FOR ^{ALL-CAPS} WILSON'S FRISE
IMPRISONMENT, AS A RESULT ~~OF~~

OF BEING INTENTIONALLY
ABANDONED BY CONFLICT-FREE
COUNSEL/IN POSSESSION OF ALL
EXCULPATORY MATERIAL, AND FORCED
TO REPRESENT HIMSELF BEFORE
THE COURTS OF MIAMI-DADE
COUNTY, FLORIDA.

(31) ^{Bar} APPENDIX 'H' EVIDENCE OF
FACTS/MISSTATEMENT BY THE
SUPREME COURT OF FLORIDA
IN PETITION NO. 5C18-2119,

TO CIRCUMVENT ^{ALL-CAPS} STAY ORDER

MOTION FOR REHEARING ^{PURSUANT TO RULE 9-33C} ^{ALL-CAPS} WAS

NEVER FILED BY ^{ALL-CAPS} CHARLES B.

^{ALL-CAPS} WHITE. ^{ALL-CAPS} WHITE

AFTER MISREPRESENTATION OF THE
FLA. B. APP. P.

PRESENTED TO THE FLORIDA
BAR HE HAD FILED, OPENING

Florida BAR INVESTIGATION
 BOID + ITALIES
 FILE NO. 2020-70,234 (IP).

PETITIONS FOR WRIT OF HABEAS
 TO THE SUPREME COURT OF FLORIDA
 IN TALLAHASSEE, FLORIDA,
 Resulting THE RESULTS OF
 THIS INVESTIGATION CONTINUE
 TO GO UNDOCKETED, BY AND
 UNACKNOWLEDGED BY THE
 COURT.

(32) ^{BOID + ALL} APPENDIX II: EVIDENCE OF
 DECLINATION OF ~~OFFERED~~ CRIMINAL/
 AND CIVIL REPRESENTATION, AND
 INABILITY TO ACCESS - THE - COURT
 WITHOUT AN ATTORNEY, PRIMARY
 SUBJECT OF THE PETITION ~~WAS~~
 DISMISSED BY THIS COURT ON NOVEMBER 2nd,
 2020, AND IS NOW ON REHEARINGS.

^{BOLD}
 (33) APPENDIX 'S' : TRANSCRIPT OF
 PROCEEDING OF WILSON'S CROSS -

EXAMINATION OF STATE WITNESSES

^{ALL - CAPS}
 OSCAR ~~HERKRA~~ CLEARLY
 DEMONSTRATING ^{ALL - CAPS} WILSON IS

FALSELY IMPRISONED ON AN
 UNCHANGED CRIME, TO WIT,
 UNOCCUPIED BURGLARY VS.

OCCUPIED BURGLARY ^{BOLD} ~~PARSONS~~ ^{BOLD}
 TO ^{BOLD} § 810.02(3)(a) VS. § 810.02(3)(b),

WHEN THE FACE OF THE RECORD

CLEARLY REFLECTS THE FACT
 HE WAS INVITED INTO THE

OCCUPIED PROPERTY BY AN
 AUTHORIZED PARTY AT THE

PREDDECK AND PERMITTED TO STAY.

^{ALL - CAPS}
 WILSON IS A VICTIM OF

BoiD

False Imprisonment,
Malicious prosecution. SEE

HARTMAN V. MOORE, 547 U.S.
250, 265, 126 S. CT. 1695 (2006).

ALL DEFENSE WITNESSES AND
~~WITNESSES~~ ~~WITNESSES~~ DEPOSITIONS
OF STATE'S WITNESSES WERE
INTENTIONALLY DEPRIVED
OF ^{ALL CAPS} WILSON FOR A TRIAL
IN WHICH HE WAS
SYSTEMATICALLY COERCED TO
REPRESENT HIMSELF THROUGHOUT
THE DENIAL OF CONFLICT -
FALSE COVERAGE.

ALL OTHER LAWS DON'T BECOME
^{MAKE EVIDENCE} ABROGATED, OR ~~IRRELEVANT~~ AS A RESULT
OF ^{ALL CAPS} WILSON'S MALICIOUS PROSECUTION,
FALSE IMPRISONMENT ~~AND~~ ~~THE~~ STATE COURTS
FLORIDA. ID

(BOD BATH AND CERTIFICATION) ALL-CAPI
STATION PETITIONER (WILSON) HEREBY ATTESTS UNDER PENALTY OF
PERJURY THE FOREGOING FACTS ARE TRUE AND CORRECT,
PURSUANT TO 28 U.S.C. § 1746, AND PRESENTED IN GOOD FAITH
AND NOT FOR DELAY. RULE 44.1.
Respectfully Submitted,

32

DATE _____

BY _____

JOHN J. WILSON JR.
DC# M 86-232
TOMOKA C.F.
3950 TIGER Bay ROAD
Daytona Beach, FL 32124

CERTIFICATE OF SERVICE

AAG, BARBARA JUNGK, 110 S.E. 6TH STREET,
10TH FLOOR, FT. LAUDERDALE, FL 33301;
CHRISTOPHER G. LYONS, ESQ., 2601 S. BAYSHORE
DRIVE, SUITE 100, COCONUT GROVE, FL 33133;
~~BRUCE~~ APEX REPAIRING GROUP, INC., FL
S.E. 7TH ST. (SUITE 2020) FT. LAUDERDALE, FL
33301, PEDRO SAER, 9065 S.W. 87TH AVE.,
SUITE 106, MIAMI, FL 33176;
JASHELY MOODY, THE CAPITAL, THUNDERBOLT,
FL 82399-1000; GREGORY A. KUMMERLIN,
P.A., 340 COLUMBIA DRIVE SUITE 111,
W. PALM BEACH, FL 33409; CHARLES
G. WHITE, ESQ., SUITE 700, ONE E.
BROWARD BVD., FT. LAUDERDALE, FL 33301;
PHIL NEISENSTEIN, C/O: STEVEN TAYLOR, ESQ.,
N.W. 2ND AVE., SUITE 206, MIAMI, FL 33132;
DANIEL J. JONES (MDR) MIAMI-DADE
DEPT OF CORRECTIONS, 1357 N.W. 12TH
STREET, MIAMI, FL 33125.

DATED (PETITIONER) JOHN J. WILSON JR. HEREBY ATTESTS THESE
DOCUMENTS WERE PERSONALLY HANDLED FOR FIRST CLASS MAILING
TO (TOMOKA) STAFF on 2020/1/18
Diana K. Kellie, FURNITURE, T. J. Wilson

MY JOURNAL

PLEASE MAKE EACH
APPENDIX PG. AS
LARGE, BOLD, AND
BLACK AS
THE SIZE
OF PAPER
ALLOWED.
THX. J.

33

APPENDIX

A

COLLATERAL FEDERAL

HABEAS ACTIONS FILED

IN CONJUNCTION WITH FILING

FOR INJUNCTION AGAINST

MIAMI - Dade County FOR ~~FOR~~

TRANSFERENCE OF ALL FURTHER

APPLICATIONS FOR POST-CONVICTION

RELIEF, BASED ON INABILITY OF

PETITIONER TO "ACCESS THE COURTS"

OF FLORIDA PURSUANT TO RULE 1.610

MY JOURNAL

make as
Bis, Black +
BOLD AS THE
paper will allow.

APPENDIX
B

ADVANCE Disciplinary Petition
Pending
Against Charles G. White

AT THE TIME HE FILED

No. 19-847 in this

Court, in violation of

RULE 8.

MY JOURNAL

APPENDIX

'C'

EVIDENCE OF "TORTURE"

AS DEFINED UNDER PROVISIONS
OF C.A.T AS A BASIS FOR

CAUSE TO OBSTRUCT

PETITIONER'S ACCESS /

ACCESS-TO-THE COURTS

OF THE UNITED STATES

IN VIOLATIONS OF THE 1st, AND 8th

AMENDMENTS' CREATES - E. UNLAWFUL

PUNISHMENT CAUSE.

MY JOURNAL

Appendix X

ID'

SEPARATE AFFIDAVIT ~~FILED~~
FOR INTERVIEW ~~FILED~~
PURSUANT TO RULE 65
OF THE F.R.C.V.P. IN THE
DC Circuit / F.I.S.A.

COURT. Electronic Correspondence
FROM INTERNAL AFFAIRS OF THE
MIAMI BEACH POLICE DEPT DATE
BACK TO 2013, WITH ROBERT LASKY,
S.A.C., MIAMI OFFICE OF THE
F.B.I. COPIED AND ADVISED.

MY JOURNAL

APPENDIX
I E

EVIDENCE FILED WITH THE
SUPREME COURT OF FLORIDA
PETITIONER SOUGHT TO
DISCHARGE ATTORNEY ^{ALL-CAPS} WHITE
SINCE NOVEMBER 22ND, 2016,
IN CONTRADICTION TO THE
COURT'S RULING IN SC18-3

MY JOURNAL

APPENDIX
IF

EVIDENCE OF THE CLERK'S
OFFICE OF MIAMI-DADE COUNTY'S
FAILURE TO PROPERLY FILE

NOTICE, MOTIONS, AND EVIDENCE
TO OBTAIN THE RECORD(S);

INVESTIGATIONS DIVISION OF

D.O.J.'S REFERRAL OF THE

MATTER TO THE ADMIN.

OFFICE OF THE UNITED

STATES COURTS. NO NOTICE TO DATE

MY JOURNAL

APPENDIX

material H /

THIS REPRESENTATION FILED

By THE Clerk's OFFICE

OF THE Supreme Court OF

FLORIDA, VIOLATING ITS

OWN ^{all-caps} STAY ORDER on

DIRECT Appeal NO. 3D15-2653.

^{all-caps} WITH NEVER FILEDREHEARING.

MY JOURNAL

APPENDIX

I

DECLINATION OF PRIVATE
CRIMINAL AND CIVIL REPRESENTATION
ON NOVEMBER 4th, 2020,
AS A RESULT OF THE
COURT'S REFUSAL IN
CASE NO. 20-5566 ON
^{MI-COPS} NOVEMBER 2nd, 2020,
AND EVIDENCE ~~SE~~ ~~INABILITY~~ OF
DENIAL OF CRIMINAL REPRESENTATION
FOR PETITIONER'S APPEAL, IN
VIOLATION OF THE 6TH AMENDMENT.