

No. 20-5674

ORIGINAL

Supreme Court, U.S.
FILED

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OFFICE OF THE CLERK

IN THE
SUPREME COURT OF THE UNITED STATES

In re JAMES WARD, PETITIONER,

VS.

TROY STEELE, RESPONDENT.

ON PETITION FOR A WRIT OF HABEAS CORPUS TO THE
MISSOURI SUPREME COURT

PETITION FOR A WRIT OF HABEAS CORPUS

James Ward #267830
Potosi Correctional Center
11593 State Highway 0
Mineral Point, MO 63660
573-438-6000

Petitioner, pro se

QUESTIONS PRESENTED

Consistent with the holding in Strickland v. Washington, 466 U.S. 668 (1984), which held that to prove prejudice on a claim of ineffective assistance of counsel, a defendant must show that "there is a reasonable probability that, but for counsel's unprofessional errors, the result of the proceeding would have been different."

1. Has prejudice been shown where defense counsel fails to inform the defendant that he can plead guilty and accept an offer of "30 YEARS OR LIFE CONCURRENT", and as a result of counsel's failure to inform defendant of State's plea offer, defendant proceeds to trial and is ultimately tried, convicted, and sentenced to CONCURRENT TERMS OF LIFE WITHOUT PAROLE AND THIRTY YEARS, and A CONSECUTIVE TERM OF FIFTEEN YEARS?
2. What remedy, if any, should be provided for ineffective assistance of counsel during plea bargain negotiations if the defendant was later convicted and sentenced pursuant to constitutionally inadequate procedures?
3. Is the Missouri Supreme Court's denial of the writ petition on this issue contrary to established federal case law in Missouri v. Galin E. Frye, 132 S.Ct. 1399 (2012)?

LIST OF PARTIES

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

TABLE OF CONTENTS

OPINIONS BELOW	1
JURISDICTION	2
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED	3
STATEMENT OF THE CASE	4-15
REASONS FOR GRANTING THE WRIT	16
CONCLUSION	17

INDEX TO APPENDICES

APPENDIX A	ORDER of the Missouri Court of Appeals
APPENDIX B	ORDER of the Circuit Court of Washington County
APPENDIX C	ORDER of the Missouri Supreme Court
APPENDIX D	STATE'S RECOMMENDATION/PLEA OFFER
APPENDIX E	AUTHORIZATION FOR RELEASE OF ATTORNEY CASE FILES
APPENDIX F	SENTENCE AND JUDGMENT
APPENDIX G	CIRCUIT COURT DOCKET SHEET

TABLE OF AUTHORITIES CITED

CASES

Alvernaz v. Ratelle, 831 F.Supp. 790 (S.D. Cal. 1993)
Arnold v. Thaler, 630 F.3d 367 (5th Cir. 2011)
Becton v. Hun, 205 W. Va. 139 (1999)
Ebron v. Commissioner of Correction, 992 A.2d 1200 (Conn. App. 2010)
Evitts v. Lucey, 469 U.S. 387 (1985)
Ex Parte Lemke, 13 S.W.3d 791 (Tex. Ct. Crim. App. 2000)
Florida v. Nixon, 543 U.S. 175 (2004)
Griffin v. United States, 330 F.3d 733 (6th Cir. 2003)
Hill v. Lockhart, 474 U.S. 52 (1985)
In re Crews, 159 S.W.3d 355 (Mo. banc 2005)
Jiminez v. State, 144 P.3d 903 (Okla. Crim. App. 2006)
Johnson v. Duckworth, 793 F.2d 898 (7th Cir. 1986)
Leatherman v. Palmer, 583 F.Supp.2d 849 (W.D. Mich. 2008)
Libretti v. United States, 516 U.S. 29 (1995)
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Nunes v. Mueller, 350 F.3d 1045 (9th Cir. 2003)
Oliver v. United States, 292 Fed. Appx. 886 (11th Cir. 2008)
Padilla v. Kentucky, 130 S.Ct. 1473 (2010)
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Premo v. Moore, 131 S.Ct. 733 (2011)
Roe v. Flores-Ortega, 528 U.S. 470 (2000)
Rompilla v. Beard, 545 U.S. 374 (2005)
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Satterlee v. Wolfenbarger, 453 F.3d 362 (6th Cir. 2006)
Shiwlochan v. Portuondo, 345 F.Supp.2d 242 (E.D.N.Y. 2004)
State v. Donald, 10 P.3d 1193 (Ariz. Ct. App. 2000)
State v. Kraus, 397 N.W.2d 671 (Iowa 1986)
Strickland v. Washington, 466 U.S. 668 (1984)

Cont. CASES

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United States ex rel. Caruso v. Zelinsky, 689 F.2d 435 (3rd Cir. 1982)
United States v. Castro, 365 Fed. Appx. 966 (10th Cir. 2010)
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United States v. Morrison, 449 U.S. 361 (1981)
United States v. Mouling, 557 F.3d 658 (D.C. Cir. 2009)
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United States v. Wilson, 719 F.Supp.2d 1260 (D. Or. 2010)
Wiggins v. Smith, 539 U.S. 510 (2003)
Williams v. State, 605 A.2d 103 (Md. 1992)
Wright v. Van Patten, 552 U.S. 120 (2008)

CONSTITUTIONAL PROVISIONS

U.S. Constitution, Sixth Amendment

OTHER AUTHORITIES

American Bar Association Criminal Justice Standards, 4-6
Missouri Rules of Professional Conduct, Rule 4-1

IN THE
SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF HABEAS CORPUS

Petitioner respectfully prays that a writ of habeas corpus issue to review the judgment below.

OPINIONS BELOW

This case is from state courts:

The Order of the (Missouri Supreme Court) highest state court to review the merits appears at Appendix C to the petition and is unpublished.

The Order of the (Missouri Court of Appeals) intermediate court of appeals to review the merits appears at Appendix A to the petition and is unpublished.

The Order of the (Circuit Court of Washington County) lower court in the first instance to review the merits appears at Appendix B to the petition and is unpublished.

JURISDICTION

This case is from state courts:

1. Petitioner filed a petition for a writ of habeas corpus in Case No. 13WA-CC00167 addressing this issue in the Circuit Court of Washington County on April 3, 2013. The court denied the writ petition on September 5, 2013;
2. Petitioner filed a petition for a writ of habeas corpus in Case No. ED108108 addressing this issue in the Missouri Court of Appeals for the Eastern District on August 5, 2019. The court denied the writ petition on August 27, 2019;
3. Petitioner filed a petition for a writ of habeas corpus in Case No. SC98269 addressing this issue in the Missouri Supreme Court on December 13, 2019. The court denied the writ petition on February 18, 2020.

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

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The Fourteenth Amendment to the United States Constitution provides, in relevant part, that "No State shall ... deprive any person of life, liberty, or property, without due process of law."

The Sixth Amendment to the United States Constitution provides, in relevant part, that no person shall be denied the right to legal counsel in any criminal proceeding, and the effective assistance of legal counsel.

STATEMENT OF THE CASE

INTRODUCTION

On 12-1-98, John T. Bird, Assistant Circuit Attorney issued a plea offer and recommendation of 30 YEARS OR LIFE CONCURRENT, and said offer would expire on 3-1-99. However, Petitioner, ward's trial counsel, David Bruns, Assistant Public Defender did not inform Ward of the offer, and Ward's trial began on May 17, 1999. Ward moves to vacate his conviction and sentence on the ground that he was denied effective assistance of counsel when trial counsel, David Bruns failed to inform him of the plea offer. The difference between the lighter sentence offered in the plea offer and the sentence ward actually received is evidence of the prejudice Ward suffered as a result of counsel's failure and deficient performance. Ward first learned of the expired plea offer while incarcerated during March 2011, when he requested and obtained his complete case file from the Missouri Public Defender System's Archives. After reviewing counsel's case file, he discovered the plea offer, in which counsel failed to inform him of. Ward asserts that had he been informed of the opportunity to plead guilty to "30 YEARS OR LIFE CONCURRENT" he would have done so, and thus, but for counsel's failure and deficient performance, the outcome of the proceedings would have been different.

GROUND ONE

TRIAL COUNSEL WAS INEFFECTIVE FOR FAILING TO INFORM PETITIONER, JAMES WARD OF THE STATE'S PLEA OFFER AND RECOMMENDATION, AND PETITIONER WAS PREJUDICED THEREBY, AND THUS, PETITIONER WAS DENIED HIS RIGHTS TO DUE PROCESS OF LAW, TO EFFECTIVE ASSISTANCE OF COUNSEL, AND TO FUNDAMENTAL FAIRNESS, IN VIOLATION OF THE SIXTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION AND ARTICLE I, §§ 10 AND 18(a) OF THE MISSOURI CONSTITUTION.

ARGUMENT

On 12-1-98, John T. Bird, Assistant Circuit Attorney issued a plea offer and recommendation of 30 YEARS OR LIFE CONCURRENT, and said plea offer would expire on 3-1-99. This document was stamp-filed by the Circuit Clerk's Office "1998 DEC-1 P 2:57" (App. D).

Petitioner, Ward's trial counsel, David Bruns, Assistant Public Defender did not inform Ward of the plea offer. Consequently, Ward's trial began on May 17, 1999. Ward was found guilty after a jury trial, and sentenced to concurrent terms of life imprisonment without parole and 30 years imprisonment, and a consecutive term of 15 years imprisonment.

Ward first learned of the expired plea offer while incarcerated during March 2011, when he requested and obtained his complete case file from the Missouri Public Defender

System's Archives. After reviewing trial counsel's case file he discovered the plea offer, in which counsel failed to inform him of (App. E).

Ward moves to vacate his convictions and sentences on the ground that he was denied effective assistance of counsel when defense counsel, David Bruns failed to inform him of the plea offer. The difference between the lighter sentence offered in the plea offer and the sentence Ward actually received is evidence of the prejudice Ward suffered as a result of counsel's failure and deficient performance. Ward asserts that had counsel informed him of the opportunity to plead guilty to "30 YEARS OR LIFE CONCURRENT" he would have done so, and thus, but for counsel's failure and deficient performance, the outcome of the proceedings would have been different.

I. James Ward Was Denied Effective Assistance Of Counsel When His Lawyer Failed To Inform Him Of The State's Plea Offer.

The Sixth Amendment guarantees criminal defendants the right to effective assistance of counsel during plea bargain negotiations. Hill v. Lockhart, 474 U.S. 52, 57-59 (1985); Padilla v. Kentucky, 130 S.Ct. 1473, 1480-1481 (2010). The standard is the familiar one set out in Strickland v. Washington, 466 U.S. 668 (1984). A defendant establishes ineffective assistance by showing (1) "that counsel's

representation fell below an objective standard of reasonableness," Id. at 688, and (2) "that there is a reasonable probability that, but for counsel's unprofessional errors, the result of the proceeding would have been different," Id. at 694. Premo v. Moore, 131 S.Ct. 733, 737-738, 739-740 (2011); Wright v. Van Patten, 552 U.S. 120, 124 (2008); Hill, 474 U.S. at 57-58.

Defense counsel's failure to inform Ward of the prosecutor's plea offer unquestionably fell below an objective standard of reasonableness. Had defense counsel acted with reasonable professional competence, Ward would have pleaded guilty to 30 YEARS OR LIFE CONCURRENT. Because of counsel's deficient performance, however, Ward received a sentence of CONCURRENT TERMS OF LIFE WITHOUT PAROLE AND THIRTY YEARS, and A CONSECUTIVE TERM OF FIFTEEN YEARS. But for counsel's deficient performance, the result of this proceeding would have been different. Strickland, 466 U.S. at 694.

The well-established Strickland standard of prejudice appropriately and effectively addresses counsel's deficient performance. Plea negotiations are a critical stage in the criminal process. Padilla, 130 S.Ct. at 1486. A guilty plea entered without knowledge of a prior, and more favorable, plea offer is not entered with full awareness of the alternatives available to the defendant. This lack of awareness undermines the reliability of the plea and renders it fundamentally unfair.

The different outcome changed the result of the proceedings to Ward's disadvantage. Limiting "relief" to standing trial does not remedy the prejudice.

A. The Right To Effective Assistance Of Counsel Ensures The Fairness Of All Critical Stages Of A Criminal Prosecution, Including Plea Negotiations, Not Just The Fairness Of Trial.

The Sixth Amendment guarantees effective assistance of counsel "[i]n all criminal prosecutions," not just at the trial, but before trial and after trial. "[P]erhaps the most critical period of the proceedings ... [is] the time of ... arraignment until the beginning of ... trial." Powell v. Alabama, 287 U.S. 45, 57 (1932). The Court noted that at such time "[t]he critical hand of counsel is needed ..." Id. at 54-55. The Court has also guaranteed defendants the right to effective assistance of counsel during the sentencing stage of the criminal proceeding, Rompilla v. Beard, 545 U.S. 374, 380 (2005), and in the appellate stage following trial. Evitts v. Lucey, 469 U.S. 387, 396 (1985). The Court noted in Evitts that counsel's assistance is necessary because an appeal is "an adversary proceeding that - like a trial - is governed by intricate rules that to a layperson would be hopelessly forbidding." Id.

The Court recognizes that effective counsel is necessary to provide fairness to the defendant and reliability to the

proceeding because the complex nature of criminal law demands an expertise and experience well beyond the un-trained layperson. These complexities are inherent in the process of negotiating a plea agreement. "Plea bargains are the result of complex negotiations suffused with uncertainty, and defense attorneys must make careful strategic choices in balancing opportunities and risks." Premo, 131 S.Ct. at 741 (emphasis added). A layperson defendant "requires the guiding hand of counsel at every step in the proceedings against him." Powell v. Alabama, 287 U.S. at 53 (emphasis added).

While defense counsel represented Ward during the pre-trial process, his failure to communicate the State's plea offer to Ward is comparable to the absence of counsel during this critical stage. The complete denial of counsel during a critical stage of a judicial proceeding mandates a presumption of prejudice because "the adversary process itself has been rendered presumptively unreliable." Roe v. Flores-Ortega, 528 U.S. at 471, citing United States v. Cronic, 466 U.S. 648, 659 (1984). Here, we are not dealing with the State's discretion to make or withdraw a plea offer. Rather, we are dealing with an offer that was rejected because of defense counsel's ineffective assistance, with disastrous results for [the defendant]. In the end, this ineffective assistance and the resulting prejudice are attributable to the State.

B. Failure To Inform The Defendant Of A Plea Offer
Amounts To Constitutionally Deficient Performance

No duty is more basic to the role of defense counsel than that of informing the client of a plea offer made by the prosecutor. "An attorney undoubtedly has a duty to consult with the client regarding important decisions," including an offer to plead guilty, which "is an event of signal significance in a criminal proceeding." Florida v. Nixon, 543 U.S. 175, 187 (2004)(internal quotation marks omitted). The Court has made it clear that "it is the responsibility of defense counsel to inform a defendant of the advantages and disadvantages of a plea agreement." Libretti v. United States, 516 U.S. 29, 50 (1995).

Since defense counsel has a constitutional obligation to consult with a client about a plea offer, and the advantages and disadvantages of accepting a plea offer, counsel has the constitutional obligation to inform the defendant that the prosecutor has made a plea offer. Every federal Court of Appeals to have addressed the issue has held that defense counsel's failure to advise a client of a plea offer amounts to constitutionally deficient performance. Rodriguez-Rodriguez, 929 F.2d at 752; Pham, 317 F.3d at 182; Caruso, 689 F.2d at 438; Brannon, 48 Fed. Appx. at 53; Arnold v. Thaler, 630 F.3d 367, 370 (5th Cir. 2011)(per curiam); Griffin v. United States, 330 F.3d 733, 737 (6th Cir. 2003); Johnson v. Duckworth, 793

F.2d 898, 902 (7th Cir. 1986), cert. denied, 479 U.S. 937 (1986); Blaylock, 20 F.3d at 1465-66; United States v. Castro, 365 Fed. Appx. 966, 967 (10th Cir. 2010); Oliver v. United States, 292 Fed. Appx. 886, 887 (11th Cir. 2008), cert. denied, 129 S.Ct. 2023 (2009); United States v. Mouling, 557 F.3d at 669.

The Court has often used the standards of the American Bar Association as guidelines for determining whether counsel's performance is reasonable. See, e.g., Rompilla v. Beard, 545 U.S. at 387; Wiggins v. Smith, 539 U.S. 510, 525 (2003); Padilla, 130 S.Ct. at 1482. The ABA's standards for Criminal Justice require that "[d]efense counsel should promptly communicate and explain to the accused all significant plea proposals made by the prosecutor." ABA Criminal Justice Standard 4-6.2(b).

The Court has stated: "States are free to impose whatever specific rules they see fit to ensure that criminal defendants are well represented ..." Roe v. Flores-Ortega, 528 U.S. at 479. Missouri's Rule 4-1.4 of the rules of professional conduct states: "(a) A lawyer shall: (1) keep the client reasonably informed about the status of the matter; [and] ... (b) A lawyer shall explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding representation." In In re Crews, 159 S.W.3d 355, 359 (Mo. banc 2005), the Missouri Supreme Court held that pursuant

to Rule 4-1.4, counsel is required to keep the client informed of significant developments in the case, and "a lawyer who receives from opposing counsel ... a proffered plea bargain in a criminal case must promptly inform the client of its substance." (emphasis added).

Trial counsel failed to meet his professional responsibility to inform Ward of the State's plea offer. In failing to do so, his performance fell short of the level of competence required by the Sixth Amendment.

II. Ward Suffered Prejudice Because Had He Been Informed Of The Plea Offer The Outcome Would Have Been Different; He Would Have Received A Shorter Sentence

Ward did not allege that his trial counsel's performance was deficient because he failed to secure the most advantageous plea possible. He alleges that trial counsel failed to act as a reasonably competent attorney when he failed to communicate the plea offer made by the State. The difference between the sentence offered in the plea bargain - 30 YEARS OR LIFE CONCURRENT - and the sentence Ward actually received - CONCURRENT TERMS OF LIFE WITHOUT PAROLE AND THIRTY YEARS, and A CONSECUTIVE TERM OF FIFTEEN YEARS - is not evidence of counsel's deficient performance; it is evidence of the prejudice Ward suffered as a result of counsel's deficient performance. This is the familiar context-driven Strickland

test of deficient performance and resulting prejudice. But for counsel's deficient performance, the outcome of the proceedings would have been different.

Ward was entitled to effective counsel who would advise him of the State's plea offer. He was entitled to awareness of the alternatives available to him before he decided whether to accept a plea offer or go to trial. A straight forward application of the Strickland test applies because, but for counsel's deficient performance, the outcome of Ward's proceeding would have been different. Ward does not seek to modify or supplant the Strickland test.

III. The Appropriate Remedy Is To Allow Ward To Plead Guilty To The Original Offer Because That Is The Only Remedy That Will Restore Him To The Position He Would Have Occupied Had Counsel Not Been Ineffective.

The ordinary remedy for constitutional violations is to restore the victim of the violation to the position he would have occupied had the violation not occurred. The constitutional violation suffered by Ward was the loss of the opportunity to accept the State's plea offer. The only way to restore Ward to the position he would have occupied had counsel advised him of the plea offer is, to allow him to plead guilty under the terms of the plea offer.

The remedy for a constitutional violation "must closely fit the constitutional violation." United States v. Virginia, 518 U.S. 515, 547 (1996). Constitutional remedies are "necessarily designed, as all remedies are, to restore the victims of [constitutional violations] to the position they would have occupied in the absence of such conduct." Milliken v. Bradley, 418 U.S. 717, 746 (1974).

Remedies for deprivation of effective assistance of counsel are no different. "Cases involving Sixth Amendment deprivations are subject to the general rule that remedies should be tailored to the injury suffered from the constitutional violation." United States v. Morrison, 449 U.S. at 364. "Our approach has thus been to identify and neutralize the taint by tailoring relief appropriate in the circumstances to assure the defendant the effective assistance of counsel." Id. at 365. As the Court has observed, "[t]he adequacy of any remedy is determined solely by its ability to mitigate the constitutional error." Rushen v. Spain, 464 U.S. 114, 119-120 (1983). An appropriate remedy returns the defendant to the point before the constitutional violation in order to put him in the position he would have occupied but for the error.

The only remedy appropriate to cure counsel's ineffectiveness in failing to communicate the State's plea offer to Ward is to permit Ward to accept the original offer. Anything less does not "mitigate the constitutional error."

Rushen v. Spain, supra. Many of the state courts have reached the same conclusion. See, e.g., Satterlee v. Wolfenbarger, 453 F.3d 362, 371 (6th Cir. 2006) n.7, cert. denied, 549 U.S. 1281 (2007); Nunes v. Mueller, 350 F.3d 1045, 1056-57 (9th Cir. 2003); Blaylock, 20 F.3d at 1468-69; United States v. Wilson, 719 F.Supp.2d 1260, 1275 (D. Or. 2010); Leatherman v. Palmer, 583 F.Supp.2d 849, 871-72 (W.D. Mich. 2008), aff'd, 387 Fed. Appx. 533 (6th Cir. 2010); Shiwlochan v. Portuondo, 345 F.Supp. 2d 242, 264-65 (E.D.N.Y. 2004), aff'd, 150 Fed. Appx. 58 (2d Cir. 2005); Alvernaz v. Ratelle, 831 F.Supp. 790, 797-99 (S.D. Cal. 1993); Ebron v. Commissioner of Correction, 992 A.2d 1200, 1214-19 (Conn. App. 2010), appeal pending, 297 Conn. 915, 995 A.2d 954 (2010); Jiminez v. State, 144 P.3d at 905, 907; Ex Parte Lemke, 13 S.W.3d 791, 797-98 (Tex. Ct. Crim. App. 2000); State v. Donald, 10 P.3d 1193, 1202-05 (Ariz. Ct. App. 2000), cert. denied, 534 U.S. 825 42 (2001); Becton v. Hun, 205 W. Va. 139, 516 S.E.2d 762, 768 (1999); Williams v. State, 605 A.2d 103, 110-11 (Md. 1992); State v. Kraus, 397 N.W.2d 671, 676 (Iowa 1986).

Petitioner, Ward is available and willing to testify at an evidentiary hearing that trial counsel, David Bruns, Assistant Public Defender failed to convey a plea offer made by the Assistant Circuit Attorney, John T. Bird, and that he would have accepted said plea offer if he had known about it, and that the plea would have resulted in a lighter sentence.

REASONS FOR GRANTING THE PETITION

In compliance with Rules 20.1 and 20.4 Petitioner states as follows:

1. The writ will be in aid of the Court's appellate jurisdiction, by establishing its precedence that will furnish a basis for determining an identical or similar case that may subsequently arise, or present a similar question of law.

2. Exceptional circumstances warrant the exercise of the Court's discretionary powers, in that, a constitutional violation has resulted. Thus, a manifest injustice or miscarriage of justice would result in the absence of habeas relief.

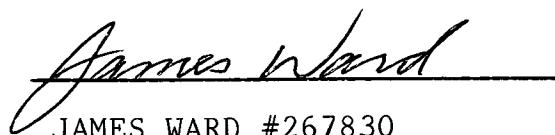
3. Adequate relief cannot be obtained in any other form or from any other court, as Petitioner has presented this issue before the Washington County Circuit Court; Missouri Court of Appeals; and Missouri Supreme Court.

The writ should issue because: (1) Petitioner was denied effective assistance of counsel when defense counsel, David Bruns failed to inform him of the plea offer; (2) the difference between the lighter sentence offered in the plea offer and the sentence Mr. Ward actually received is evidence of the prejudice he suffered as a result of counsel's failure and deficient performance; and (3) but for counsel's failure and deficient performance, the outcome of the proceedings would have been different.

CONCLUSION

Restoring Petitioner, Ward to the position he would have occupied but for counsel's deficient performance comports with the Court's Sixth Amendment precedent. Doing so will not create new rights or a new legal test; nor will it interfere with the orderly administration of justice. Allowing Ward to accept the un-communicated offer will remedy the Sixth Amendment prejudice he suffered, consistent with the standard the Court established in Strickland v. Washington.

Respectfully submitted,



JAMES WARD #267830
POTOSI CORRECTIONAL CENTER
11593 STATE HIGHWAY O
MINERAL POINT, MO 63660
573-438-6000

PETITIONER, PRO SE

Date: 8/7/2020