

CASE No. 20-6012

IN THE SUPREME COURT OF THE UNITED STATES

ALLEN K. YOUNG

PETITIONER

V.

UNITED STATES COURT OF APPEALS FOR THE
SEVENTH CIRCUIT

PETITION FOR REHEARING

Allen K. Young comes before this court PRO SE,
and petitions said court and Justice BARRETT
for review. Chief Judge Woods of the SEVENTH
CIRCUIT made a statement in the HAZLEY
case that has merit on my case. This case
was added to the law computer after my writ was
sent into the Supreme court. Plus other substantial
grounds not previously presented. WHAT'S more intervening
circumstances of substantial or controlling effect than the
highest judge in the Appeal court in 2020 stating you cannot
have a TRAFFICK case without the offensive element "entice",

ii ii

Allen K. Young

Emc LEXINGTON Federal medical center

P.O. Box 14500

LEXINGTON Ky 40512-4500

NO. 20-6012

THE PETITIONER REQUEST REHEARING BASED
ON:

(A) FURTHERING, NORTHERN DISTRICT
APPEAL COURT CHIEF JUDGE WOODS STATED:

TO PROVE 18 U.S.C.S 1591 AND 1594 THE
GOVERNMENT NEEDED TO SHOW THAT HAZLEY
"ENTICED" A MINOR TO ENGAGE IN A
COMMERCIAL SEX ACT."

JOSEPH HAZLEY CASE 812 FED. APPX,
378 7TH CIRCUIT COURT OF APPEALS.

(B) I WAS NOT INDICTED ON "ENTICE"
OR "18 USC 2422(b)". SO THERE IS NO WAY
FOR THE GOVERNMENT TO PROVE "ENTICE" WITH MY
SUPERSEDE INDICTMENT, OR PROVE 18 U.S.C.S. 2422(b)

(C) JURY INSTRUCTIONS IMPERMISSIBLY
BROADENED THE SCOPE OF THE SUPERSEDE INDICTMENT,

(D) THE SUPERSEDE INDICTMENT WAS A
VIOLATION OF PETITIONER'S FIFTH AMENDMENT
RIGHTS, IN THAT FELONY PROSECUTION CANNOT
BE COMMENCED BY INDICTMENT WHERE COURTS
INSTRUCTION ALLOWS A JURY TO FIND A
DEFENDANT GUILTY FOR OFFENSES OTHER THAN
THE OFFENSE STATED IN THE INDICTMENT.

See: UNITED STATES V. VESPAAS, 586 F. 2d 101 8th circuit (1978)
See: UNITED STATES V. HARRILL, 877, F. 2d 341 5th circuit (1985)
See: U.S. APP. LEXIS 12076 5th circuit August 10, 1985.

Brady violation:

How can I be Rush to TRIAL without ALL of my TRANSCRIPTS. THE Government said THE TRANSCRIPTS was not ready before trial. How could I compare what the girls stated in the First grand Jury TRANSCRIPT, to the Supersede Indictment Grand Jury TRANSCRIPT And mount A proper defense. How Do I know The supersede Indictment is real.

IT WAS not signed by Government, it WAS Amended BAD. Most of ALL I WAS not Given A TRANSCRIPT from the Grand Jury. That's my Constitutional Right.
see exhibit 4

Sentence: The court GAVE me A STANdby counsel. A STANdby counsel does not qualify as assistance of counsel under the Sixth Amendment.

THE standby counsel was the same counsel I had removed from my case to go pro'se. He did nothing, He did not object to THE court Sentence me with offense element I WAS not Indicted on. OR I ASK How can I be Sentence on A 18: U.S.C.S 1551 or 1594 case with THE offense elements, "Entice" 18: U.S.C.S 2422 or Recruit, or Solicit, or Advertise, Patronize, NOW, THREE years later Chief Judge Woods SAYS the SAME thing in the HAZLEY CASE.

Why I should get the writ

(1) Three years after my case and After I was denied a writ, A new case law was Added to the law computer. The same Head Judge that denied my appeal, Now says today you HAVE to be Indicted on "entice". The Government HAVE to prove that offensive element in order for a person To be found guilty of 18 U.S.C.S 1591 or 1594.

THAT means I have been IN prison for nothing. my Indictment should have been voided see exhibit #4, exhibit #2, exhibit #3

Then Because the offensive element "entice" was not in my Indictment the court sentence me with "coercion". Chief Judge Woods says in my direct appeal that was wrong coercion is not for minors. The Jury was not Told To Find me guilty of what I was sentence with, see exhibit #5

See exhibit 12^{II} I HAD no mens rea in my supersede Indictment. (Section (A)) was Amended in my commerce clause which change the held statute.

AT My sentence the court gave me a standby counsel I HAD moved from my case. The law says A standby counsel does not qualify as assistance of counsel under the sixth Amendment.

Why I should get the writ

- (1) Three years later chief Judge weeds of 7th circuit appeal change her mind on what it TAKES to be guilty of A TRAFFICK CASE. SHE Agree with me you HAVE To be "Indicted" on "entice". THE Government HAVE to prove that offensive element. THE CASE Just Appeared on the LAW computer, After my writ WAS denied.
- (2) How can I be A sex-offender if I did not "Recruit" or "entice" any one. What I did wrong or HAD TO prove.
- (3) How could I be sentence for offensive element I WAS not Indicted on in my Supersede Indictment.
- (4) I WAS force to go to trial without my Supersede Indictment Grand Jury Transcripts. That's A Brady Violation and Violate my due process.
- (5) AT my Sentence THE ^{court} ~~court~~ gave me A stand by counsel. A STANDby counsel does not qualify as assistance of counsel under the Sixth Amendment.

I feel IF THE Supreme court go by the Law of the land the court should step in And rule on this writ. This statute effect A lot of people with a lot of time.

Why I Should Get THE WRIT

last:

My Brady Violation, IT IS my constitutional right to receive my supersede indictment grand jury Transcript before trial, or do the law change if you go pro's.

IF THE Highest Court Job is To Step In And make statute, laws the same for All courts and Judges, How can A statute that effect 99% minority be so unclear. This statute carry more time than if A person killed someone. You can kill A person and get less time, But that statute is clear. The High court need to step In and explain what congress meant by the "or" in the statute my Judge says it mean you don't need that element, 11th and 5th circuit says you do. section (b) on exhibit #12. my Judge said you don't need "Recruit" or "entice" to be convicted of 1591 or 1594. my Judge CHAN says you do not need A mens rea you can combine, (A) whoever knowingly with the commerce clause, in (a1) 5th and 11th circuit says you can not. The way The statute is now you can give A person a ride And be A TRAFFICKER. IS This The message the court want to send to the American people. This case should be Reverse And This Supersede Indictment Avoided, I should be Acquitted.

Respectfully Submitted
Allen K. Young
Allen K. Young

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

CERTIFICATE OF COMPLIANCE
NO: 20-6012

Allen K. Young

V

UNITED STATES COURT OF APPEAL FOR THE
SEVENTH CIRCUIT

Petition For Rehearing

THE grounds are limited to intervening
circumstances of substantial or controlling effect
or to other substantial grounds not previously
presented.

THE petition for rehearing is presented
in good faith and not for delay.

I declare under penalty of perjury that the
foregoing is true and correct.

Executed on June 2021

D. Hedden

Fayette Co. KY

#598856

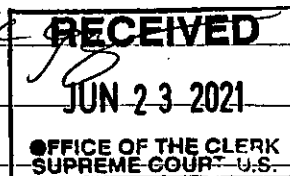
Comm Exp. 4-6-22

[Signature]

Respectfully Submitted

Allen K. Young

[Signature]



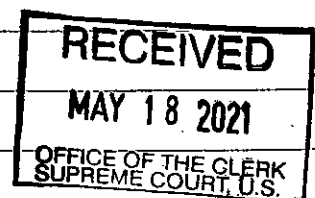
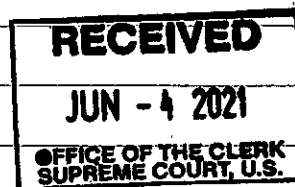
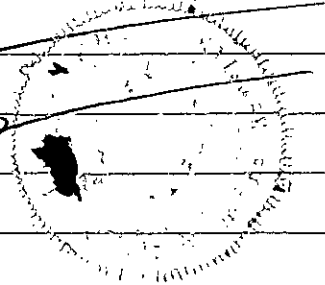
NO: 20-6012

I Allen K. Young, An inmate confined in an institution at Fmc Lexington Ky. I deposited my petition for the rehearing. my writ of Certiorari was denied Dec. 07 2020. The Document must have gotten lost in THE mail Due to the covic and Trump situation with the post office. IT was PLACED in the institutions internal mail system, before the last day of filing. I am in compliance with 28 U.S.C 1746 setting out the date of deposito. I did everything I could to follow the courts rules. It WAS mailed OUT 20th DAY OF Dec.

D. Hadden, Notary
Fayette Co. Ky
#598854
Comm Exp. 4-6-22

Respectfully Submitted

Allen K. Young
Allen K. Young



**Additional material
from this filing is
available in the
Clerk's Office.**