

No. 20-6665

IN THE

Supreme Court of the UNITED STATES

SCOTT PETERS PETITIONER

- VS -

People of the State
OF ILLINOIS Respondants

Supreme Court, U.S.
FILED

DEC 21 2020

OFFICE OF THE CLERK

ON PETITION FOR A WRIT OF CERTIORARI TO
ILLINOIS APPELLATE COURT 2ND DISTRICT

PETITION FOR WRIT OF CERTIORARI

Prepared by SCOTT PETERS Pro Se
MS2851

MEDUUM SECURITY UNIT
711 KASKASKIA ST
MENARD, ILLINOIS
62859

QUESTIONS PRESENTED

THE PETITION FOR A WRIT OF HABEAS CORPUS SHOULD BE GRANTED FOR THE FOLLOWING REASONS. THE CHARACTER TO BE CONSIDERED, THAT THE STATE COURTS AND STATE COURTS OF LAST RESORT HAVE SO FAR DEPARTED FROM THE ACCEPTED AND USUAL COURSE OF JUDICIAL PROCEEDINGS INVOLVING THE DISCLOSURE OF EVIDENCE IN ILINOIS THAT NOT ONLY ARE THEY IN CONFLICT WITH THEMSELVES, THERE OUT OF TOUCH WITH THE NATION AND THE UNITED STATES SUPREME COURT. THESE IMPORTANT FEDERAL QUESTIONS HAVE NOT BEEN AND SHOULD BE SETTLED BY THIS COURT AND IS COMPLETELY WITH THIS COURT'S RELEVANT DECISIONS AS WELL SETTLED BUT ARE CONTORTED AND MUST BE ADDRESSED BY;

- I.) WHETHER COMPILING A TRIAL RECORD WITHOUT DISCLOSURE OF ALL MATERIALS AND INFORMATION NEEDED TO PERFORM POST-TRIAL LITIGATION PROVES DEFECTIVE.
- II.) WHETHER ITS LAWFUL TO RELEASE MATERIALS SAID TO BE IMPOUNDED OR CONTINUE TO CONCEAL OTHERS FROM VIEW WITHOUT NOTICE OF THEIR IMPOUNDMENT OR HEARING AS TO THE REASON FOR IMPOUNDMENT. AND WITHIN FILE NUMBER.
- III.) WHETHER ITS LAWFUL TO CONCEAL MATERIALS, EVIDENCE AND DOCUMENTS FROM THE TRIAL RECORD (SUCH AS WARRANTS, AFFIDAVITS, INVENTORIES THAT MAY BE USED TO PROVE 4TH AMENDMENT VIOLATIONS) OR OTHER SUCH EVIDENCE BY CONCEALING IT IN UNIDENTIFIABLE FILES TO OBSCURE ITS USE, INTENTIONALLY BY THE COURT AND ITS CLERK.
- IV.) WHETHER THE CLERK PERFORMED A JUDICIAL FUNCTION AS AN OFFICER OF THE COURT WHEN SHE CHANGED THE COURT'S ORDER

QUESTIONS Presented

BY JUDICIAL FUNCTION WITHOUT HEARING OR FACT SHE ONLY HAS CHARGE OF THE CLERICAL PART OF THE BUSINESS.

V.) WHETHER THE STATE OF ILLINOIS MANUAL ON RECORD KEEPING STATUTES CONSTITUTES OBSTRUCTION BY PLACING EVIDENCE IN GENERIC FILES WITHOUT DESCRIPTION.

VI.) WHETHER THE CONCEALMENT AND OBSTRUCTION OF FILES DESIGNATED WITH ONLY GENERIC FILE NUMBERS CONTAINING EVIDENCE AND DOCUMENTS NEEDED TO LITIGATE POST-TRIAL REMEDIES RELIANT ON PROTECTING MATERIAL FACTS, DENIED PETITIONER FULL OPPORTUNITY TO PRESENT HIS CLAIMS.

VII.) WHETHER TWO LAST QUESTIONS FOR THIS COURT EXIST BOTH EXIST HAND IN HAND TOGETHER. 1.) WHETHER A PETITION UNDER ILLINOIS STATUTE AS LISTED IN ILLINOIS CRIMINAL LAW AND PROCEDURE 2014 CHAPTER 735 PAGE 1088 PART 14 POST JUDGEMENT STATUTE 735 ILCS 5/2-1401 CONSTITUTES A POST-CONVICTION REMEDY PETITION QUALIFYING A PETITIONER TO FILE FOR EVIDENCE TO FORM HIS CLAIMS. AND 2.) IF SO A DENIAL REVEALS JURISDICTION ON THE TRIAL COURT AND APPELLATE COURT BECAUSE THEY ANSWERED IT.

TABLE OF AUTHORITIES CITED

Questions Presented

I.) BASED ON EVIDENCE AND DOCUMENTS PRESENTED IN THE APPELLATE AND TRIAL RECORD IN CASES 02-15-650 AND 14CF939 RESPECTIVELY. CLERK OF THE COURT KATHRINE M. KEEFE FALSLY CERTIFIED, FAILED TO PRODUCE ACCORDING TO COURT ORDER DIRECTING "PETERS" TRIAL RECORD BE COMPILED ACCORDING TO SUPREME COURT RULE 608 BY/AND OBSTRUCTING DISCLOSURE OF MATERIALS AND INFORMATION HE NEEDED TO FORM A DEFENSE AND PERFECT AND PRESERVE THE RECORD FOR POST TRIAL LITIGATION AND PROVE LAWFULL

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- INNOCENCE. A COURT CAN AND SHOULD TAKE NOTICE OF THESE CASES.
- PEOPLE V- GRAU 263 ILL. APP. 3d 874, 876 (2ND DIST 1994)
 - BRADY V- MARYLAND 373 U.S. 83, 83 S. CT 1194 (U.S. S. CT). PASSIM
 - JENKS V- UNITED STATES 353 U.S. 657, 77 S. CT. 1007 (U.S. S. CT). PASSIM
 - ILLINOIS SUPREME COURT RULE 608 (2018)
 - JACKSON V- VIRGINIA 443 U.S. 307, 319. (1979) PASSIM
 - UNITED STATES CONSTITUTION, AMEND XIV 3, 4 PASSIM
 - ILLINOIS CONSTITUTION 1970, ART I, §8 PASSIM
 - ILLINOIS CONSTITUTION 1970, ART I, §2 PASSIM
 - ILLINOIS CONSTITUTION 1970, ART I, §6 PASSIM

II.) BASED ON EVIDENCE AND DOCUMENTS PRESENTED IN THE APPELLATE AND TRIAL RECORD IN CASES 02-16-0289 AND 14CF939 RESPECTIVELY. CLERK OF THE COURT KATHRINE M. KEEFE KNOWINGLY RELEASED IMPOUNDED MATERIALS AND DOCUMENTS WITHOUT THE COURT'S ORDER BY JUDGE PRATHERS REMOVING THE ALLEGED IMPOUNDMENT ORDERS AND CONTINUED TO OBSTRUCT ADDITIONAL DOCUMENTS FROM CONCEALED CASES 14MR606, 14MR590. A COURT CAN AND SHOULD TAKE NOTICE OF THESE CASES. VIOLATING "PETERS" DUE PROCESS RIGHTS.

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- PEOPLE V- GRAU 263 ILL. APP. 3d 874, 876 (2ND DIST 1994). PASSIM
- BRADY V- MARYLAND 373 U.S. 83, 83 S. CT 1194 (U.S. S. CT.) PASSIM
- JENKS V- UNITED STATES 353 U.S. 657, 77 S. CT. 1007 (U.S. S. CT.) PASSIM
- UNITED STATES CONSTITUTION, AMEND XIV PASSIM

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III.) BASED ON EVIDENCE AND DOCUMENTS PRESENTED IN THE CIVIL AND CRIMINAL TRIAL RECORD IN CASES 18CH54 AND 14 CF 939 RESPECTIVELY, CLERK OF THE COURT KATHARINE M. KEEFE KNOWINGLY AND WITH INTENT CONTINUED TO OBSTRUCT AND WITHHOLD MATERIALS, EVIDENCE AND DOCUMENTS AFTER (PARA 18) FALSELY CERTIFYING AND DEFYING A COURT ORDER TO COMPLY AND PRODUCE PETERS TRIAL RECORD ACCORDING TO ILLINOIS SUPREME COURT RULE 60P. WHEN THE ATTORNEY GENERAL JASON KANTER REPRESENTING "KEEFE" BROUGHT FORTH INFORMATION THAT MANY ADDITIONAL MR OR (MISCELLANEOUS REMEDY) CASES OBSTRUCTED FROM PETERS EXISTED AND VIOLATED "PETERS" CONSTITUTIONAL RIGHTS OF DISCLOSURE AND DUE PROCESS. A COURT CAN AND SHOULD TAKE NOTICE OF THESE CASES.

- PEOPLE-V-GRAU 263 ILL. APP. 3d 874, 876 (2ND DIST 1994)
- BRADY-V-MARYLAND 373 U.S. 83, 83 S. CT. 1194 (U.S.S. CT.)
- TENCKS-V-UNITED STATES 353 U.S. 83, 83 S. CT. 1007 (U.S.S. CT.)
- UNITED STATES CONSTITUTION AMEND X IV
- ILLINOIS CONSTITUTION 1970, ART I, § 8
- ILLINOIS CONSTITUTION 1970, ART I, § 2
- ILLINOIS CONSTITUTION 1970, ART I, § 6
- ILLINOIS SUPREME COURT RULE 60P
- 720 ILCS 5/31-4-OBSTRUCTION-

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IV.) "PETERS" WAS DENIED A FAIR TRIAL AND POST-CONVICTION REMEDIES WHEN KATHARINE M. KEEFE RENDERED JUDGEMENT WHEN SHE CHANGED THE COURTS ORDER BY JUDICIAL FUNCTION AS FIRST SHE IS ONLY "AN OFFICER OF THE COURT WHO HAS CHARGE OF THE CLERICAL PART OF ITS BUSINESS" KEEFE DID THIS WHEN SHE TOOK IT UPON HERSELF TO CHANGE THE COURTS ORDER AS WHEN SHE OBSTRUCTED THESE DOCUMENTS BY NOT COMPLYING THE RECORD OF "PETERS" BY THE JUDGES ORDER TO COMPLY TO ILLINOIS SUPREME COURT RULE 60P. SHE DECIDED IN HER OWN JUDGEMENT TO NOT FILE THE APPROPRIATE DOCUMENTS AS OUTLINED IN S. CT. 60P. ANOTHER WORDS SHE SUPERSEDED THE COURTS JUDGEMENT WITH HER OWN. A JUDICIAL ACT WITH INTENTION THAT VIOLATED "PETERS" RIGHTS OF DISCLOSURE AND DUE PROCESS RIGHTS AS WELL. SEE PEOPLE EX REL VANDERBURG-V-BRADY 275 ILL. 261, 262 (1916).

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• People -V- GRAU 263 ILL. APP. 3d 874, 876 (2nd Dist 1994)	PASSIM
• BRADY -V- MARYLAND 373 U.S. 83, 83 S. CT. 1194 (U.S. S. CT.)	PASSIM
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• UNITED STATES CONSTITUTION AMEND X IV	PASSIM
• ILLINOIS CONSTITUTION 1970, ART I, § 8	PASSIM
• ILLINOIS CONSTITUTION 1970, ART I, § 2	PASSIM
• ILLINOIS CONSTITUTION 1970, ART I, § 6	PASSIM
• ILLINOIS SUPREME COURT RULE 608	PASSIM
• ILLINOIS SUPREME COURT RULE 321	PASSIM

V.) BASED ON EVIDENCE AND DOCUMENTS "PETERS" WAS DENIED A 11, 12, 13. FAIR TRIAL when Clerk of the Court KATHARINE M. KEEFE VIOLATED THE COURT'S ADMINISTRATIVE RULES IN THAT "KEEFE" IGNORED THE SUPREME COURT OF ILLINOIS MANUAL ON RECORD KEEPING STATUTES BY PLACING COURT RECORDS IN "PETERS" CASE ERRONEOUSLY AND WRONGFULLY UNDER MISCELLANEOUS REMEDY FILES & MR FILES KNOWINGLY CONCEALING THEM FROM "PETERS" AND THE PUBLIC. A COURT CAN AND SHOULD TAKE NOTICE OF THESE CASES.

• ILLINOIS SUPREME COURT MANUAL ON RECORD KEEPING (EFFECT 1996 Revised 2006)	PASSIM
• People -V- GRAU 263 ILL. APP. 3d 874, 876 (2nd District 1994)	PASSIM
• 720 ILCS 5/31-4 OBSTRUCTION	PASSIM
• UNITED STATES CONSTITUTION AMEND X IV	PASSIM
• ILLINOIS CONSTITUTION 1970, ART I, § 8	PASSIM
• ILLINOIS CONSTITUTION 1970, ART I, § 2	PASSIM
• ILLINOIS CONSTITUTION 1970, ART I, § 6	PASSIM
• BRADY -V- MARYLAND 373 U.S. 83, 83 S. CT. 1194 (U.S. S. CT.)	PASSIM
• JENKS -V- UNITED STATES 353 U.S. 83, 83 S. CT. 1007 (U.S. S. CT.)	PASSIM
• UNION OIL CO OF CALIFORNIA -V- LEAVELL 220 F. 3d 562 (THIRD)	PASSIM

VI.) BASED ON TESTIMONY, STATEMENTS, EVIDENCE AND DOCUMENTS 14, 15, 16, 17. FROM CASE 14CF939, 02-16289, 02-15-650, 02-17-0857, 18CH54, THE COURT, JUDGE PRATERS, THE CLERK OF THE COURT KATHARINE M. KEEFE CONCEALED, OBSTRUCTED, WITHHELD DISCLOSURE MATERIALS, EVIDENCE AND DOCUMENTS. DENYING PETERS USE OF THE INFORMATION AT TRIAL, DIRECT APPEAL, PLA, 2-1401 petition, STATE HABEAS, ILLINOIS SUPREME COURT CERTIORARI AND THE UNITED STATES SUPREME COURT PROCEEDINGS. THE DEFENDANT-APPELLANT WAS DENIED FULL OPPORTUNITY TO PREPARE HIS DEFENSES

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VI.) (CONT.) AND MAKE TACTICAL DECISIONS WITH THE AID OF THESE INFORMATION. AND A COURT CAN AND SHOULD TAKE NOTICE OF THESE CASES.

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• People v- AGUILAR 218 ILL. APP. 3d 1, 9-10 (1st Dist 1991)	PASSIM
• People v- GRAU 263 ILL. APP. 3d 874, 876 (2nd Dist 1994)	PASSIM
• BRADY v. MARYLAND 373 U.S. 83, 83 S. Ct. 1194 (U.S. Ct)	PASSIM
• JENCKS v- UNITED STATES 353 U.S. 657, 77 S. Ct. 1007 (U.S. Ct)	PASSIM
• UNITED STATES CONSTITUTION AMEND XIV	PASSIM
• ILLINOIS Supreme Court Rule 608	PASSIM
• ILLINOIS Supreme Court Rule 321	PASSIM
• ILLINOIS CONSTITUTION 1970, Art I, § 8	PASSIM
• ILLINOIS CONSTITUTION 1970, Art I, § 2	PASSIM
• ILLINOIS CONSTITUTION 1970, Art I, § 6	PASSIM
• ILLINOIS Supreme Court (MARION ADMINISTRATIVE RECORD REPORT)	PASSIM
• ILLINOIS Supreme Court Rule 615	PASSIM
• UNITED STATES v- REYNOLDS 73 S. Ct 528, 534	PASSIM

VII.) BASED ON THE LAST TWO QUESTIONS ANSWERED BY THE 18. APPELLATE COURT AND THE TRIAL COURT ON A PENDING POST CONVICTION PETITION OR REMEDY PENDING TO QUALIFY A PETITIONER TO REQUEST ENDORECE IN ORDER TO FORM AND FILE HIS CLAIMS AND WHETHER DENIAL REQUESTS JURISDICTION TO THE TRIAL COURT AND APPELLATE COURT WHO ANSWERED IT.

• UNITED STATES v- BURR	25 Fed. CAS AT PAGE 187	PASSIM
• BRADY v- MARYLAND	373 U.S. 83, 83 S. Ct. 1194 (U.S. Ct.)	PASSIM
• UNITED STATES CONSTITUTION	AMENDMENT XIV	PASSIM
• UNITED STATES v- REYNOLDS	73 S. Ct. 528, 534	PASSIM
• People v- AGUILAR	218 ILL. APP. 3d 1, 9-10	PASSIM
• ILLINOIS Supreme Court Rule 1		PASSIM
• ILLINOIS Supreme Court Rule 321		PASSIM
• People v- GRAU	263 ILL. APP. 3d 874, 876 (2nd Dist)	PASSIM

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:

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APPENDIX B

APPENDIX C

JURISDICTION

☒ For cases from State Courts:

THE DATE ON WHICH THE HIGHEST STATE COURT DECIDED
MY CASE WAS 30 SEPTEMBER 2020,

A COPY OF THAT DECISION APPEARS AT APPENDIX 2,

☐ A TIMELY PETITION FOR REHEARING WAS THEREAFTER DEIVED 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 INCULDED _____ (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

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I. UNITED STATES -V- BURR 25 Fed. CAS PAGE 187 PASSIM
 BRADY -V- Maryland 373 U.S. 83, 83 S.Ct. 1194 (U.S.S.Ct) PASSIM
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 JACKSON -V- VIRGINIA 443 U.S. 307, 319 (1979) PASSIM
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IV. BRADY -V- Maryland 373 U.S. 83, 83 S.Ct. 1194 (U.S.S.Ct) PASSIM
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VI. BRADY -V- Maryland 373 U.S. 83, 83 S.Ct. 1194 (U.S.S.Ct) PASSIM
 JENCKS -V- UNITED STATES 353 U.S. 657, 77 S.Ct. 1007 (U.S.S.Ct) PASSIM
 UNITED STATES -V- REYNOLDS 73 S.Ct. 528, 534 (U.S.S.Ct) PASSIM
 UNITED STATES CONSTITUTION AMENDMENT XIV PASSIM

IN THE
Supreme Court of THE UNITED STATES

PETITION FOR WRIT of CERTIORARI

PETITIONER Respectfully Prays THAT A WRIT OF CERTIORARI
ISSUE TO REVIEW THE JUDGMENT Below.

OPINIONS Below

☒ For CASES From State Courts:

THE OPINION OF THE HIGHEST STATE COURT TO REVIEW
THE MISCARS APPEARS AT APPENDIX 2 TO THE PETITION
AND IS:

☐ Reported At _____; OR

☐ Has Been Designated For Publication But Is Not Yet
Reported; OR

☒ IS UNPUBLISHED.

THE OPINION OF THE 22ND JUDICIAL CIRCUIT COURT APPEARS AT APPENDIX 6 TO THE PETITION AND IS;

☐ Reported At _____; OR

☐ Has Been Designated For publication But Is Not Yet
Reported; OR

☒ IS UNPUBLISHED.

STATEMENT OF CASE

EARLY IN THE MORNING OF OCTOBER 16, 2014, McHenry County Sheriff's Deputies Dwight Maness, Khalia Satkiewicz and Eric Luna stated they were dispatched to "PETERS" Home at 1313 W.N.E. Shore Drive in McHenry Illinois Allegedly from a Dispatch call from two states away in Michigan to conduct a well-being check because "PETERS" was killing his wife (R518-519, 636-37, 662-63) officers arrived without lights or sirens in separate vehicles and parked 300-500 feet from the residence down the street. (R519-20, 637, 654, 657, 664).

MANESS and SATKIEWICZ Alleged to knock loudly on the front door but did not receive an answer, (R522-23, 639-40) From LUNA'S position He Alleged He could hear what was transpiring (R667-668). MANESS and SATKIEWICZ Alleged they noticed surveillance cameras on the garage and near the front door; They also Alleged the cameras moved when they moved (R523-24, 639, 655-56). MANESS Alleged they were walking into an ambush (R524-25). MANESS Alleged He heard "A BOMB" from inside the home, He started to take cover and Alleged He pushed SATKIEWICZ out of the way as shooting erupted from inside the home, (R526). MANESS Alleged He then attempted to retrieve a rifle from his patrol car "to even the odds" (R526). MANESS with a firearm in his hand Alleged WAS IDENTIFIED BY "PETERS" WAS SHOT IN THE leg Running from "PETERS" Home (R541), (R245 EXHIBIT). Detective WATERS Before THE APRIL 2015 Grand Jury stated "Prior, as they entered the residence", Reference by AN ENTRY by SATKIEWICZ and MANESS. "PETERS" stated He Fled Because He Had an Actual Objective. Before He Faced a Deadly Threats when He Repelled it. (SEE EXHIBIT 245) MANESS FLEW FORWARD AND THE GUN FLEW OUT OF HIS HAND (R892, R541) EVIDENCE OF MANESS BEING SHOT AND HIS POSITION WERE FOUND 35 Feet in the opposite direction (R541, R683) From the FIREARM. SATKIEWICZ Alleged BEING SHOT IN THE leg AS she neared the fence in front of "PETERS" Home (R645). LUNA Alleged He SAW A RED IN HER PANTS AT THE FENCE, BUT MENTIONED NO SHOTS BEING IDENTIFIED AT THE TIME (R661). LUNA Alleged

STATEMENT OF CASE

TO FIRE EIGHT SHOTS AT A SILHOUETTE OF A MAN. (R675-676)
LUNA COULD NO LONGER SEE THE SILHOUETTE OF A MAN (R680) AFTER THE INCIDENT WAS OVER OFFICER HERAMO OF THE ISLAND LAKE POLICE, HAD RESPONDED TO THE SCENE AND DRAGGED MANESS RECKLESSLY 200 FEET TO A OPENING IN THE FENCE, STATES WITNESS DAWN WILSON MADE HIM AWARE OF, (R529, 688-689, 691-692). DAWN WILSON STATES WITNESS WOULD LATER TESTIFY SHE DID NOT KNOW THEY WERE POLICE OFFICERS (R749, R745-R749). AFTER THE INCIDENT DETECTIVE KELLY WAS IN CHARGE OF PROCESSING THE SCENE. (R548) DETECTIVE KELLY ADMITTED ONLY ONE SURVEILLANCE SYSTEM, A SAMSUNG SYSTEM WITH THREE CAMERAS, KELLY STATED NO VIDEO OR AUDIO RECORDING WAS RECOVERED FROM THAT OR ANY SURVEILLANCE SYSTEM. (R596-597, 628-630; PL EX 79, 80, 169). PETERS WAS CHARGED BY COMPLAINT ON OCTOBER 16, 2014, AND THEN BY INFORMATION ON OCTOBER 21ST 2014, BY INDICTMENT ON NOVEMBER 6TH 2014 AND AGAIN BY INDICTMENT ON APRIL 2ND 2015. THE DEFENDANT APOLOGIZED FOR HIS ACTIONS (R1041-1042) HOWEVER, CONTINUES TO ASSERT HIS LAWFULL INNOCENCE AS IT IS THE SHERIFF'S OFFICE WHICH REFUSES TO ACCEPT ANY RESPONSIBILITY FOR THESE ACTIONS. (R1043). AT "PETERS" HOME.

Refer to Questions

REASONS FOR GRANTING

I.) BASED ON EVIDENCE AND DOCUMENTS PRESENTED IN THE APPELLATE AND TRIAL RECORD IN CASES 02-15-650 AND 14-CF939 RESPECTIVELY, CLERK OF THE COURT KATHARINE M. KEEFE FALSELY CERTIFIED, FAILED TO PRODUCE ACCORDING TO COURT ORDER DIRECTING "PETERS" TRIAL RECORD BE COMPILED ACCORDING TO SUPREME COURT RULE 608 BY/AND OBSTRUCTING DISCLOSURE OF MATERIALS AND INFORMATION HE NEEDED TO FORM A DEFENSE AND PERFECT AND PRESERVE THE RECORD FOR POST TRIAL LITIGATION AND PROVE LAWFULL INNOCENCE. A TRIAL COURT CANNOT AND SHOULD TAKE NOTICE OF THESE CASES.

SCOTT PETERS WAS NOT PROVEN GUILTY BEYOND A REASONABLE DOUBT AND ANY TRIER OF FACT COULD NOT HAVE FOUND THE ESSENTIAL ELEMENTS OF THE ALLEGED CRIMES OF PETERS BEYOND A REASONABLE

REASONS FOR GRANTING

DOUBT. IF PETERS HAD THE EVIDENCE HE WAS CHEATED OUT OF BY THE COURT AND "KEEFE" THE CLERK. THE FACT THAT KEEFE WHO WORKS FOR THE COURT AND WORKS CLOSELY WITH THE COURT CONCEALED THE EVIDENCE PETERS DESPERATELY NEEDED TO PERFECT AND PRESERVE THE RECORD AND THEN AGAIN TO BE DENIED FOR USE IN THE APPELLATE COURT AS IT WOULD SHOW THE ALTERNATIVE NARRATIVE TO LAW ENFORCEMENTS. AS UNDER JACKSON APPELLATE REVIEW "MUST INCLUDE CONSIDERATION OF ALL OF THE EVIDENCE," "NOT JUST THE EVIDENCE CONVENIENT TO THE STATES THEORY OF THE CASE." ILLINOIS CONSTITUTION 1970, ART I, § 8 "TO DEMAND THE NATURE AND CAUSE OF THE ACCUSATION AND HAVE A COPY THEREOF," "KEEFE" UNDER SUPREME COURT RULES AND "DUE PROCESS" ILLINOIS CONSTITUTION 1970, ART I, § 2 HAD A DUTY TO PRODUCE THE DOCUMENTS AND DISCLOSE THEM BY COURT ORDER OF THE TRIAL COURT (R, CI, CC, I, II, III, IV, V, Pgs 1 to 8,) AND TO HAVE THEM CONFORM TO ILLINOIS SUPREME COURT RULE 608 TO INCLUDE ITEMS FROM ILLINOIS CONSTITUTION 1970, ART I, § 6, SEARCH WARRANTS, SEARCH WARRANT AFFIDAVITS, AND LIKE DOCUMENTS. KEEFE AGAIN FAILED PURPOSELY AND WITH INTENT WHEN SHE KNOWINGLY OMITTED THESE DOCUMENTS FROM PETERS RECORD AFTER SPECIFICALLY ORDERED BY COURT ORDER TO COMPLY WITH ILLINOIS SUPREME COURT RULES 608, 324. SIGNIFICANTLY, BECAUSE THESE DOCUMENTS AND OTHERS WERE WITHHELD FROM "PETERS" FOR IMPEACHING, CREDIBILITY AND INCONSISTENCY PURPOSES, HE CANNOT USE THEM IN TRIAL STRATEGY AND DEFENSE FORMATION. TENCK V. UNITED STATES 77 S. CT. 1007, "BECAUSE A SUFFICIENT FOUNDATION WAS ESTABLISHED BY TESTIMONY OF MATUSOW AND FORD THAT THERE REPORTS WERE OF THE EVENTS AND ACTIVITIES RELATED IN THEIR TESTIMONY". TENCK FURTHER STATES "EVERY EXPERIENCED TRIAL JUDGE AND TRIAL LAWYER KNOWS THE VALUE FOR IMPEACHING PURPOSES OF STATEMENTS OF THE WITNESS RECORDING THE EVENTS BEFORE THEIR BUILT TREACHEROUS MEMORY. Flat contradiction between the witness testimony AND THE VERSION OF EVENTS GIVEN IN HIS REPORTS IS NOT THE ONLY TEST OF INCONSISTENCY. THE OMISSION FROM THE REPORTS OF FACTS RELATED AT TRIAL, OR A CONTRAST IN EMPHASIS UPON THE SAME FACTS, EVEN A DIFFERENT ORDER OR TREATMENT, ARE ALSO RELEVANT TO THE CROSS EXAMINING PROCESS OF TESTING THE CREDIBILITY OF A WITNESS' TRIAL TESTIMONY. "PETERS" BECAUSE OF "KEEFE'S" CONCEALMENT HAS NO WAY TO FORM A DEFENSE OR MAKE TACTICAL DECISIONS WITH THE

REASONS FOR GRANTING

Information), MOREOVER, IN *JENCKS-V-U.S.* UNDER Footnote 12 Chief Justice Marshall citing *U.S.-V-BURR*, 25 Fed. Cas. page 187, cites when confronted with a Request for inspection of a letter addressed to the U.S. President and in the possession of the Attorney for the United States, stated;

NOW IF A PAPER BE IN Possession of the Opposite Party, what Statement of its contents or Applicability can be Expected From THE PERSON who claims its Production, He not Precisely knowing its contents?

* * * IT IS OBJECTED that the Particular passages of the letter which are Required are not Pointed out. But How can this be Done while the letter itself is withheld? * * * 25 Fed. Cas. at pg 191.

FURTHER, THE *JENCKS* Court Established AND Has taken notice of *UNITED STATES-V-REYNOLDS*, 345 U.S. 1, 73 S. Ct. 528, in the Holdings of the Court of Appeals THAT, IN CRIMINAL CAUSES' * * * THE GOVERNMENT CAN INVOKE ITS EVIDENTIARY PRIVILEGES ONLY AT THE PRICE OF letting the Defendant go. free. AS THE RATIONALE of the criminal CASE IS THAT, SINCE THE GOVERNMENT WHICH PROSECUTES AN ACCUSED ALSO HAS THE DUTY TO SEE THAT JUSTICE IS DONE, IT IS UNCONSIDERABLE TO ALLOW IT TO UNDERTAKE PROSECUTION AND THEN INVOKE ITS GOVERNMENTAL PRIVILEGES TO DEPRIVE THE ACCUSED OF ANYTHING WHICH MIGHT BE MATERIAL TO HIS DEFENSE, 73 S. Ct. at pages 539.

OFFICERS MAWESS, SARKIEWICZ AND LUNIA ALLEGED AND TESTIFIED TO (ROA 661) MATTERS THAT WOULD BE CONTAINED IN DOCUMENTS RELATED TO SUPREME COURT RULE 608 OF ILLINOIS. SUCH AS SEARCH WARRANTS, SEARCH WARRANT AFFIDAVITS, ARREST WARRANTS, ARREST WARRANT AFFIDAVITS, POLICE REPORTS AND OTHER SUCH DOCUMENTS CONCEALED AND WITHHELD FROM "PIETRES", (ROA 517, 634)

SIGNIFICANTLY, OFFICER CAITLYN KELLY ALSO ALLEGED AND TESTIFIED TO (ROA 547) MATTERS THAT WOULD BE CONTAINED IN DOCUMENTS RELATED TO SUPREME COURT RULE 608 OF ILLINOIS. SEARCH WARRANTS, SEARCH WARRANT INVENTORIES, SEARCH WARRANT AFFIDAVITS, POLICE REPORTS AND OTHER SUCH DOCUMENTS CONCEALED AND WITHHELD FROM "PIETRES", AND AS EVIDENCE LEAD DETECTIVE

REASONS FOR GRANTING

AND ALLEGED ON OATH, THE ONLY Detective/Evidence Technician collecting EVIDENCE (ROA P. 126 L19) AND IN CONTROL OF SUCH EVIDENCE SUCH THAT IT MAY CHANGE THE OUTCOME OF PETERS' CONVICTION. "PETERS" WAS DENIED FULL OPPORTUNITY TO PREPARE HIS DEFENSES, AND MAKE TACTICAL DECISIONS WITH THE AID OF THESE INFORMATION AND PRESERVE AND PERFECT HIS RECORD AS TO HIS RESPONSIBILITY TO DO. (ROA Direct Appeal 547.)

REFER TO QUESTIONS

II.) UPON PETERS' OBTAINING KNOWLEDGE AND INFORMATION OF THE EXISTENCE OF KATHERINE M. KEEFE KNOWINGLY POSSESSION OF A SEARCH WARRANT INVENTORY OF "PETERS" HOME FROM POLICE REPORT SUPPLEMENT 31 LEAD 4 IN "PETERS" PRO SE APPELLATE CASE 02-16-0289 AND THE DOCUMENTS CONCEALMENT, A COURT CAN AND SHOULD "TAKE NOTICE" OF THESE CASES. PEOPLE V. GRANT 263 ILL. APP. 3D. 874, 876 (2ND DIST. 1994). "KEEFE" IN FAILING TO COMPOSE THE RECORD ACCORDING TO THE TRIAL COURT'S ORDER, BY S.C.T. RULE 608 KNOWINGLY RELEASED THIS DOCUMENT "SEARCH WARRANT INVENTORY" AN ALLEGED EMPLOYED DOCUMENT WITHOUT THE JUDGE'S ORDER WHO IMPOUNDED IT PREVIOUSLY. FURTHER, EVEN AFTER RELEASE THE CASE NOW KNOWN AS 14MR590 WAS STILL NOT MADE A PART OF THE (EX 10) RECORD, UNTILL "PETERS" DEMANDED APPELLATE DEFENDER SILVERN MAKE IT A PART OF THE RECORD IN APPELLATE CASE 02-15-650. (A COURT CAN AND SHOULD... TAKE NOTICE OF THESE CASES.) ALMOST TWO AND ONE HALF YEARS AFTER THE ORDER FOR "KEEFE" TO COMPILE THE RECORD ACCORDING TO ILL. S.C.T. RULE 608. "PETERS" THEN DEMANDED THE CASE NO. 14MR606 A CASE "KEEFE" ILLEGALLY (EX 10) CONCEALED IN AN MISCELLANEOUS REMEDY CIVIL CASE NUMBER SO ITS CONTENTS COULD NOT BE DISCOVERED, BE MADE A PART OF THE RECORD BY "SILVERN" (EX 10) APPELLATE DEFENDER. THE APPELLATE COURT OF THE SECOND DISTRICT ON CASE 02-15-650 MADE BOTH CASES 14MR590 AND 14MR606 A PART OF THE RECORD BY GRANTING "SILVERN'S" MOTION. IN THE ORDER THE COURT ERRONEOUSLY STATED THESE DOCUMENTS WERE ALREADY A PART OF THE RECORD IN CASE 14CF939. HOWEVER "PETERS" STATES FIRST, IF THESE DOCUMENTS WERE A PART OF THE RECORD WHY DID "KEEFE" FAIL TO INCLUDE THEM IN "PETERS" AND "SILVERN'S" COPY TRANSMITTED BY "KEEFE" AND CERTIFIED BY KEEFE AS COMPLETE. SECOND, THESE DOCUMENTS ARE OF EVIDENCE, PARTICULARLY "PETERS" SURVEILLANCE SYSTEM BY "FIRST ALERT", NOT THE SAMSUNG SURVEILLANCE SYSTEM ENTERED AS EVIDENCE AT TRIAL. AND PARTICULARLY 14MR590 SHOWS BOTH SYSTEMS WERE REMOVED FROM HIS HOME AND 14MR606 SHOWS THE VIDEO, AUDIO CARD FROM THE "FIRST ALERT SYSTEM" NEITHER WAS ENTERED INTO EVIDENCE AT TRIAL. SO BY ILLINOIS COURT RULES "DOCUMENTS FILED WITH THE COURT OR PHYSICAL EVIDENCE BECOME PART OF THE RECORD."

REASONS FOR GRANTING

SEE I11, S. Ct Rule 606(a)(1)(2), (4)(5), (9)(10), (12), (13). THIS FURTHER IS ACCORDING TO BENJAMIN WIMMER APPELLATE DEFENDER IN A LETTER BY I11M(02-17-857) DATED APRIL 25TH 2019, IN REFERENCE TO THESE CONCEALED MATERIALS. "PETERS" THEN STATES "SILVERN" APPELLATE DEFENDER IN CASE 02-15-650 STATES A COMPLETELY OPPOSITE REVERSE OF HER IDEA OF WHAT SHOULD BE IN THE RECORD IN A LETTER TO "PETERS" ON 22 MARCH 2017 QUOTE "I HAVE EXPLAINED TO YOU, IF THE ITEMS THEMSELVES ARE NOT USED DURING TRIAL AND/OR MADE PART OF THE RECORD ON APPEAL, I CANNOT USE THEM IN THIS DIRECT APPEAL". APPELLATE DEFENDER "WIMMER" GOES ON TO POUND IN HIS LETTER QUOTE "OR IF THEY OFFERED INTO EVIDENCE AT TRIAL OR SENTENCING". SEE I11 S. Ct. R. 608 (a)(8) ("Exhibits offered at trial or sentencing.") APPELLATE DEFENDER "WIMMER" SEEMS TO THINK EVERYTHING FILED WITH THE COURT UNDER IL S. Ct. R. 606 AND FURTHER, EXHIBITS UNDER IL S. Ct. R. 608. AND "SILVERN" APPARENTLY SEEMS TO BELIEVE ONLY IL S. Ct. R. 608 APPLIES. AND THIS COURT OF APPEALS SECOND DISTRICT SEEMS TO BELIEVE THE EXHIBITS ARE ALREADY A PART OF THE RECORD. "PETERS" QUESTIONS BY FACTS. FACTS OF THE APPELLATE COURT IN CASE 02-15-0650, THE COURT SHOULD TAKE NOTICE, A COURT CAN TAKE JUDICIAL NOTICE OF OTHER CASES, PEOPLE V. GRAU 263 I11. APP. 3d, 874, 876 (2ND DISTRICT 1994). QUOTE "UNOPPOSED MOTION BY DEFENDANT-APPELLANT SCOTT PETERS, TO REQUEST LEAVE TO SUPPLEMENT THE RECORD ON APPEAL WITH EXHIBITS 236, 242-245." THE FACTS DEDUCED IN THESE LETTERS SHOW THAT IT'S OBVIOUS "KEEFE" DID NOT INCLUDE THESE MATERIALS IN "WIMMERS", "SILVERNS", OR "PETERS" RECORD. DEPRIVING "PETERS" THE USE OF THE INFORMATION DENYING "PETERS" FULL OPPORTUNITY TO PREPARE A DEFENSE MAKE TACTICAL DECISIONS AND PRESERVE AND PERFECT HIS RECORD WHICH IS HIS RESPONSIBILITY. (SEE U.S. CONSTITUTION AMEND IV). SIGNIFICANTLY, "WIMMER" AND "SILVERN" AGREE THAT, "WIMMER" IN CASE 02-17-0857 AND "SILVERN" IN CASE 02-15-0650 THAT THESE MATERIALS, EVIDENCE SHOULD BE INCLUDED IN THE RECORD AS COMPLIED BY "KEEFE" IN THE DOCUMENT SHE SWORE UNDER OATH AS COMPLETE ACCORDING TO IL S. Ct. R. 608 AND ITS DOCUMENT PAGES (C1, C2, I, II, III, IV, V, Pgs 10P, 510A, AND FURTHER THE IL S. Ct. RECORD KEEPING MANUAL. "KEEFE" KNOWINGLY AND WITH INTENT OBSTRUCTED 720 ILCS 5/31-4 BY CONCEALMENT AND DISGUISED INHIBITING "PETERS" DEFENSE. MOREOVER, "KEEFE" FAILED TO CONDUCT HER ADMINISTRATIVE DUTIES CORRECTLY AND IN DOING SO DEPRIVED "PETERS" MATERIALS, EVIDENCE AND INFORMATION IF DISCOVERED BY THE JURY AT TRIAL COULD HAVE CHANGED THE OUTCOME DUE TO THE FACT THIS MATERIAL WAS AUDIO VIDEO FROM

REASONS FOR GRANTING

"PETERS" SECOND SURVEILLANCE SYSTEM. PETERS STATED TO POLICE (REX245) AND KNEW WAS RECORDING THE INCIDENT AT HIS HOME. AS WAS PETERS FIRST SYSTEM. HAD THE CLERK "KEEFE" NOT OBSTRUCTED "PETERS" HE MOST LIKELY PREVAILLED IN ALL HIS POST-CONVICTION PROCEEDINGS BECAUSE THE RECORD WOULD BE COMPLETE. "PETERS" CONTINUES TO BE DENIED ACCESS TO THE MATERIALS.
REFER TO QUESTIONS #

III.) "PETERS" FOUND OUT EVEN AFTER LITIGATING TWO PREVIOUS APPEALS THE CLERK OF THE COURT OF MCLENNERY COUNTY CONTINUED TO CONCEAL AND DISGUISE CASES RELATED TO AND AS "KEEFE" STATES COMPANION CASES ACCORDING TO "KEEFE'S" DESCRIPTIONS UNTILL FINALLY AFTER "PETERS" HAD TO EMPLOY THE DRASTIC MEASURE OF SUEING "KEEFE" DID HER ATTORNEY THE STATE OF ILLINOIS ATTORNEY GENERAL FOR REASONS UNKNOWN TO "PETERS" PERHAPS "MISTAKE" EXPOSED NUMEROUS ADDITIONAL MR CASES IN CIVIL CASE 18CH54, THE COURT CAN TAKE NOTICE OF OTHER CASE RECORDS AND DOCUMENTS AND SHOULD TAKE NOTICE OF THIS CASE. AS (PMA18) "KEEFE" FINALLY ADMITS SHE WAS HOLDING NUMEROUS ADDITIONAL EVIDENCE CASES CONTAINING DOCUMENTS KNOWN ONLY TO HER (EX1) NOWHERE IN HER CERTIFIED UNDER OATH COPY PROVIDED TO THE APPELLATE COURT IS IT MENTIONED ANYWHERE THESE CASES EXIST BUT ONE 14MR606 (SEE ROA C1, C4, I, II, III, IV, V, Pgs 1 to 8.) CASE 14CF939, THE COURT SHOULD TAKE NOTICE AND CAN TAKE NOTICE OF OTHER CASES DOCUMENTS AND RECORDS. PEOPLE-V-GRAW 263 ILL. APP. 3d 874, 876 (2ND DIST. 1994). SHE DISCLOSED THIS INFORMATION FOUR YEARS AFTER "PETERS" TRIAL. DIVULGED ONLY THE NUMBERS NOT THE CONTENT AND INTERFERED WITH "PETERS" ABILITY TO MAKE TACTICAL DECISIONS, PREPARE A DEFENSE WITH THE AID OF THIS INFORMATION, AND CONTINUES TO WITHHOLD CONCEAL AND DISGUISE THE CONTAINED INFORMATION. IN VIOLATION OF BRADY 373 U.S. 83, JENCKS 353 U.S. 83, UNITED STATES CONST. AMEND XIV, ILLINOIS CONSTITUTION 1920, ART 2, §8, §2, §6, IL. S. Ct. RULES 608 AND 720 ILCS 5/31-4 OBSTRUCTION BY CONCEALMENT AND DISGUISE OF "PETERS" DEFENSE. SIGNIFICANTLY, "KEEFE" IS AN OFFICER OF THE COURT OF THE TWENTY-SECOND CIRCUIT WHICH BRINGS INTO QUESTION WHETHER THAT COURT BELIEVES THE IL. SUPREME COURT RULES ARE TO BE FOLLOWED AND WHETHER THEY BELIEVE IN FOLLOWING THEIR OWN (EX A + d 3 + 4) ORDERS AND RULES AS DOCUMENT (C 345, 346) IN CASE 14CF939 A COURT MAY TAKE NOTICE OF OTHER COURT CASES AND RECORDS PEOPLE-V-GRAW 263 ILL. APP. 3d 874, 876 (2ND DIST. 1994) APPARENTLY, "KEEFE" BELIEVES SHE IS ABOVE THE LAWS OF THE SUPREME COURT OF ILLINOIS AND THE UNITED STATES OF AMERICA.

IV.) "PETERS" WAS DENIED A FAIR TRIAL AND POST-CONVICTION REMEDIES WHEN KATHARINE M. KEEFE RENDERED JUDGEMENT WHEN SHE CHANGED THE COURT'S ORDER BY JUDICIAL FUNCTION AS FIRST SHE IS ONLY "AN OFFICER OF THE COURT WHO HAS CHARGE OF THE CLERICAL PART OF ITS BUSINESS" KEEFE DID THIS WHEN SHE TOOK IT UPON HERSELF TO CHANGE THE COURT'S ORDERS AS WHEN SHE OBSTRUCTED THESE DOCUMENTS BY NOT COMPLYING THE RECORD OF "PETERS" BY THE JUDGE'S ORDER TO COMPLY WITH ILLINOIS SUPREME COURT RULE 608. SHE DECIDED IN HER OWN JUDGEMENT TO NOT FILE THE APPROPRIATE DOCUMENTS AS OUTLINED IN SUPREME COURT RULE 608, ANOTHER WORDS SHE SUPERSEDED THE COURT'S JUDGEMENT WITH HER OWN, A JUDICIAL ACT WITH INTENTION THAT VIOLATED "PETERS" RIGHTS OF DISCLOSURE AND DUE PROCESS RIGHTS AS WELL. SEE PEOPLE EX REL VANDERBURY V- BRADY 275 ILL. 261. 262 (1916).

KATHARINE M. KEEFE DENIED "PETERS" FULL OPPORTUNITY TO PREPARE HIS DEFENSE AND MAKE TACTICAL DECISIONS WITH THE AID OF THIS INFORMATION. SEE DOCUMENT RORA C 345, 346. JENCKS V- UNITED STATES 83 S. CT. 1007 (U. S. CT.) FURTHER STATES UNDER HEAD NOTE [1A] THE JENCKS COURT ESTABLISHED AND HAS TAKEN NOTICE OF UNITED STATES V- REYNOLDS 73 S. CT. 528, IN HOLDINGS OF THE COURT OF APPEALS THAT, IN CRIMINAL CAUSES ~~***~~ THE GOVERNMENT CAN INVOKE ITS EVIDENTIARY PRIVILEGES ONLY AT THE PRICE OF LETTING THE DEFENDANT GO FREE. IF THIS IS TRUE THEN THE GOVERNMENT BY ORDER WAS DISPENSING THE MATERIALS TO "PETERS" WHEN "KEEFE" INTERCEDED BY ILLEGAL ADMINISTRATIVE ACTION TO CONCEAL AND OBSTRUCT "PETERS" MATERIALS EVIDENCE. "KEEFE" ACTED ON HER OWN IN THIS REGARD AND HAD COMPLETE KNOWLEDGE AS TO WHAT SHE HAD DONE SEE CASES 02-16-0089, 08CH154 A COURT MAY TAKE NOTICE OF OTHER CASES RECORDS AND DOCUMENTS

REASONS FOR GRANTING

AND SHOULD take notice of them Here. People v-GRQUI 263 ILL. APP. 3d 874, 876 (2nd Dist. 1994). where "Keefe" was contacted (Ex B) By "Peters" TWICE AND BY THIS COURT ONCE. HOWEVER, SHE continued TO conceal AND OBSTRUCT "PETERS" Defense By NOT IDENTIFYING (Ex 1) 10 ADDITIONAL concealed AND OBSTRUCTED CASES. ALSO CONTRARY (Ex 13 & 14) TO HER ASSIGNED DUTIES UNDER THE ILLINOIS Supreme Court Manual ON RECORD KEEPING (1996 Revised 2006) PART 1 SECTION L, 1 (b) BASIC RECORDS, (c) INDEX. "Keefe" continued to withhold IDENTIFICATION TO PETERS OF 10 (Ex 1) OTHER "MR CASES" Denying "PETERS" Full opportunity to PREPARE HIS DEFENSES AND make tactical DECISIONS WITH THE AID OF THIS INFORMATION. Showing "Keefe" committed OBSTRUCTION IN THE truest sense OF THE LAW. According to 700 ILLCS 5/31-4 OBSTRUCTION AND SHOULD BE PROSECUTED. Significantly, JENCKS goes on to state IT IS UNCONSIDERABLE to ALLOW THE GOVERNMENT to UNDERTAKE prosecution AND THEN INVOKE ITS GOVERNMENTAL PRIVILEGES to DEPRIVE the ACCUSED of ANYTHING WHICH MIGHT BE MATERIAL to HIS Defense. 73 S. Ct. AL page 539. THIS MATERIAL EVIDENCE AND INFORMATION CAN ONLY BE MATERIAL TO "PETERS" ABILITY to PREPARE A Defense AND make tactical DECISIONS, People v- AQUILAR 218 ILL. APP. 3d, 1, 9, 10 (1st Dist. 1991). MOREOVER, "PETERS" CONSTITUTIONAL RIGHTS OF THE UNITED STATES CONSTITUTION AMEND XIV, ILLINOIS CONSTITUTION 1970 ARTICLES 58, 52, 56, REQUIRE IT AS DOES ILLINOIS Supreme Court RULES 608, AND IN THIS INSTANCE BRADY V- MARYLAND 83 S. Ct. 1194 (US Ct) AS BRADY AFTER ALL, IS PREMISED ON THE CONSTITUTIONS FAIR TRIAL GUARENTEE, AND EVIDENCE DISCOVERED AFTER TRIAL OBVIOUSLY CANNOT BE SAID TO HAVE AFFECTED A CRIMINAL DEFENDANTS RIGHT to a FAIR TRIAL, OR EVEN A CURRENTLY PENDING APPEAL AS THE APPELLATE COURT IS NECESSARILY LIMITED TO EVIDENCE ADDUCED AT TRIAL. HOWEVER IT DOES AFFECT THE ABILITY TO HAVE FULL OPPORTUNITY TO PREPARE A Defense AND make tactical DECISIONS WITH THE AID OF THE INFORMATION. AS WELL AS PERFECT AND PRESERVE ERRORS AND OTHER ISSUES FOR THE RECORD. IN THESE SITUATIONS. FURTHER, IT INCLUDES EVIDENCE USUABLE TO IMPEACH A PROSECUTION WITNESS AS THE EVIDENCE CONCEALED AND OBSTRUCTED HERE CAN VERY WELL DO. HOWEVER "PETERS" NEVER HAD FULL OPPORTUNITY to USE IT AS HE DID NOT KNOW IT EXISTED, BECAUSE "Keefe" concealed AND OBSTRUCTED IT, ILLEGALLY.

REASONS FOR GRANTING

REFER TO QUESTIONS #

V.) BASED ON EVIDENCE AND DOCUMENTS "PETERS" WAS DENIED A FAIR TRIAL WHEN CLERK OF THE COURT KATHARINE M. KEEFE VIOLATED THE COURT'S ADMINISTRATIVE RULES IN THAT "KEEFE" IGNORED THE SUPREME COURT OF ILLINOIS MANUAL ON RECORD KEEPING STATUTES BY PLACING COURT RECORDS IN "PETERS" CASE ERRONEOUSLY AND WRONGLY UNDER MISCELLANEOUS REMEDY FILES OR MR FILES KNOWINGLY CONCEALING THEM FROM "PETERS" AND THE PUBLIC. A COURT CAN AND SHOULD TAKE NOTICE OF THESE CASES.

"KEEFE" VIOLATED "PETERS" CONSTITUTIONAL RIGHTS WHEN SHE "KNOWINGLY" PLACED COURT RECORDS ERRONEOUSLY UNDER MR CASE FILES PURPOSELY TO CONCEAL AND OBSTRUCT THEM. INHIBITING "PETERS" FULL OPPORTUNITY TO USE THE INFORMATION TO FORM A DEFENSE OR PREPARE IT, MAKE TACTICAL DECISIONS WITH THE AID OF THE INFORMATION. IN VIOLATION OF THE CONST. OF THE UNITED STATES ARTICLE VI AMEND XIV, AS WELL AS THE ILLINOIS CONSTITUTION 1970, ART I, §8, §6, §2, JENCKS V. U.S. 83 S.Ct. 1007 (U.S.Ct.) BRADY V. MARYLAND 83 S.Ct. 1194 AND FURTHER VIOLATED ILL. CLCS 5/31-4 OBSTRUCTION BY CONCEALMENT, DISGUISE IN A DEFENSE. "KEEFE" ALSO IN DOING SO VIOLATED THE SUPREME COURT'S MANUAL ON RECORD KEEPING EFFECTIVE JANUARY 1, 1996, REVISED NOVEMBER 15, 2006, WHEN SHE WITH FULL KNOWLEDGE AND NUMEROUS YEARS OF EXPERIENCE WITH IT, DISREGARDED ITS STATUTES WHICH STATE IN PARA 1425: WHEN A COMPLAINT FOR SEARCH WARRANT IS FILED WHICH DOES NOT RELATE TO A PENDING CASE A MISCELLANEOUS REMEDY (MR) CASE NUMBER IS TO BE ASSIGNED *** INDEX THE CASE IN THE CIVIL INDEX. (EXHIBIT A at 344).

IN THE INSTANT CASE ONLY ONE CASE FITS THIS CRITERION THE CASE 14MR590 AS IT WAS THE ONLY CASE ISSUED ON 16 OCTOBER 14 WITHOUT A CASE TO BE ATTRIBUTED TO. AND BY THE RULES/STATUTES IN THE MANUAL ON RECORD KEEPING OF THE ILLINOIS SUPREME COURT IS THE ONLY CASE THAT CAN HAVE AN MR, MISCELLANEOUS REMEDY DESIGNATION. THE NEXT CASE IS THE ARREST WARRANT OF "PETERS" AT 2:13 PM, AND HAS ON 16 OCTOBER 14 A CASE NUMBER OF 14CF939, AND THE COMPLAINT AS WELL FILED ON 16 OCTOBER 14. ANY DOCUMENT

REASONS FOR GRANTING

Filed AFTER THESE DOCUMENTS COULD NOT HAVE AN MR Designation AS STATED IN THE STATUTES OF THE MANUAL ON RECORD KEEPING FROM THE ILLINOIS SUPREME COURT. MOREOVER THE CASE 14 MR 606 AS TURNED OVER TO "PETERS" HAS A DATE OF ISSUANCE OF 22 OCTOBER 14 A FULL SIX DAYS AFTER THE DATE 16 OCTOBER 2014 WHEN AN CASE NUMBER IN "PETERS" CRIMINAL CASE WAS ISSUED 14 CF 939. WHICH "SIGNIFICANTLY" MEANS THIS CASE NUMBER 14 MR 606 IS IN VIOLATION OF THE STATUTES ON THE ILLINOIS SUPREME COURT'S MANUAL OF RECORD KEEPING. "KEEFE" KNOWINGLY CONCEALED AND OBSTRUCTED THIS CASE FROM "PETERS" USING HER POSITION AS CLERK TO DO SO. MOREOVER, "KEEFE" MADE A JUDICIAL DECISION TO DO SO, WHEN SHE FAILED TO COMPILE THE RECORD ACCORDING TO COURT ORDERS AND ILLINOIS SUPREME COURT RULES 608, EVEN TAKING ALL OF THESE VIOLATIONS INTO ACCOUNT, BRINGING APPELLATE DEFENDER WIMMER CASE NO. 17857 IN THIS COURT'S ASSERTION THAT ITS A PART OF THE RECORD IF ITS FILED WITH THE CLERK UNDER ILLINOIS SUPREME COURT RULE 606(9)(1)(2), (4), (5), (9), (10), (12), (13). TAKE NOTICE A COURT MAY TAKE NOTICE OF ANOTHER COURT'S CASE RECORD AND SHOULD TAKE NOTICE HERE. BECAUSE SIGNIFICANTLY, THE DOCUMENT HAS A FILED DATE OF 26 DECEMBER 2014 AND WAS STILL WITHHELD FROM THE RECORD. OR CONCEALED AND DISGUISED AS AN MR CASE. BY "KEEFE" AS "MS. SIVJEN" THE APPELLATE OBVIOUSLY COULD NOT SEE IT EITHER IN HER DEFENSE OF "PETERS" AS SHE REQUESTS IN CASE (EX 10) 02-15-0650 THAT THE RECORD BE SUPPLEMENTED WITH IT. AND THIS COURT AGREES BUT STILL REFUSES "PETERS" ACCESS TO A FULL OPPORTUNITY TO PREPARE ANY DEFENSES OR MAKE TACTICAL DECISIONS WITH THE AID OF THIS MATERIAL EVIDENCE. FURTHER, EVEN IF "KEEFE" WOULD BLAME IT ON THE COURT, THE MANUAL ON RECORD KEEPING STATES A SEARCH WARRANT WHICH IS FILED PRIOR TO A RETURN SHALL BE IMPOUNDED ONLY UNTILL A RETURN IS FILED. PART 1, SECTION L. ACCORDINGLY, ANY CASE IMPOUNDED BY COURT ORDER FALLS UNDER THE TWENTY-SECOND CIRCUIT'S LOCAL RULES 1027(E) PROCEDURE FOR IMPOUNDMENT (9) STATES: ALL MOTIONS TO IMPOUND FILES RECORDS OR DOCUMENTS MUST BE MADE IN WRITING AND PRESENTED TO THE JUDGE

REASONS FOR GRANTING

Assigned to Hear THE CASE with Appropriate Notice to All Parties OF RECORD, THE MOTION MUST EXPLAIN THE BASIS FOR THE Impounded File, RECORDS, DOCUMENTS AND SPECIFY THE PROPOSED DURATION OF THE Impoundment ORDER. Significantly, THERE IS NOWHERE IN THE RECORD AS COMPILED BY "KEEFE" AMONG THE CONTENTS, DOCKET OR ELSEWHERE SHOWING CONFORMANCE TO THEIR OWN RULES. SEE RECORD (EX-11) C/CC, I, II, III, IV, V, Pgs 1 to 8. AS OTHER IMPOUNDED FILES ARE ACCOUNTED FOR. HOWEVER, "SIGNIFICANTLY" AND MOST CURIOUSLY "KEEFE" SEEMS TO HAVE (ET) MISAPPROPRIATED 11 FILES MAKING THEM INVISIBLE FROM ALL VIEW, WHICH BY DEFINITION IS CONCEALMENT AND DISGUISE. DEFINED FROM THE PLAIN LANGUAGE OF THE STATUTE AS 720 ILCS 5/31-4 STATES A PERSON OBSTRUCTS JUSTICE WHEN, WITH INTENT TO PREVENT THE APPREHENSION OR OBSTRUCT THE PROSECUTION OR DEFENSE OF ANY PERSON, SHE KNOWINGLY COMMITS ANY OF THE FOLLOWING ACTS: (a) DESTROYS, ALTERS, CONCEALS OR DISGUISES PHYSICAL EVIDENCE, PLANTS FALSE EVIDENCE, FURNISHES FALSE INFORMATION OR; "KEEFE" KNOWS THE STATUTES AND FUNCTION OF THE POSITION OF CLERK. AFTER HAVING BEEN EMPLOYED PREVIOUS TO AND FOR THE LAST FIVE YEARS SINCE "PETERS" CASE, "KEEFE" HAD MULTIPLE OPPORTUNITIES TO MAKE THE CASE FILES KNOWN. SHE PREFERRED TO MAINTAIN HER SILENCE, SEE CASES 02-16-0289, 02-15-0650, 18C1154, AND THE MAIN CASE 14CK939 WHICH ALL STEM FROM. A COURT MAY TAKE NOTICE OF THE RECORD AND DOCUMENTS OF OTHER CASES AND SHOULD TAKE NOTICE OF THESE CASES. PEOPLE-V-GRACE 263 ILL. APP. 3D 874, 876 (2ND DIST 1994). "KEEFE" IN DOING THIS DEPRIVED "PETERS" OF A FAIR TRIAL, THE ABILITY TO PREPARE A DEFENSE AND MAKE INFORMED DECISIONS ON TACTICS WITH THE INFORMATION. SIGNIFICANTLY, IT ALSO JEOPARDIZED HIS ABILITY TO PERFECT THE RECORD AND PRESERVE THE ISSUES FOR FURTHER LITIGATION. ONE OF THE STANDARDS OF REVIEW WHICH SHOULD BE CONSIDERED IT IS PARTICULARLY IMPORTANT FOR APPELLATE COURTS TO RELIVE THE WHOLE TRIAL IMAGINATIVELY AND NOT TO EXTRACT FROM EPISODES IN ISOLATION ABSTRACT QUESTIONS OF EVIDENCE AND PROCEDURE BUT TO SEE THE OVERALL DAMAGE TO THE DEFENDANT. HOW MUCH MORE EVIDENCE EXIST OTHER THAN WHAT HAS BEEN PRESENTED HERE. OBVIOUSLY, TO REMOVE EVIDENCE AS IMPORTANT AS THIS "EVIDENCE FROM THE PUBLIC VIEW BRINGS QUESTION AND IS SUSPECT BY MOTIVE". THE QUESTION NOW TURNS TO "KEEFE" BEING AN OFFICER OF THE "COURT".

UNION OIL CO. OF CAL. - — 13 - V- LEAVELL 220 F.3d 562 (7th Cir).

REASONS FOR GRANTING

REFER TO QUESTIONS #

VI.) BASED ON TESTIMONY, STATEMENTS, EVIDENCE AND DOCUMENTS FROM CASE 14CF939, 02-16-289, 02-15-650, 02-17-857, 18CH54, THE COURT, JUDGE PRATHERS, THE CLERK OF THE COURT KATHERINE M. KEEFE CONCEALED, OBSTRUCTED, WITHHELD DISCLOSURE MATERIALS, EVIDENCE AND DOCUMENTS, DENYING PETERS USE OF THE INFORMATION AT TRIAL, DIRECT APPEAL, PLA, 2-1401 petition, STATE HABEAS, ILLINOIS SUPREME COURT CERTIORARI, AND THE UNITED STATES SUPREME COURT PROCEEDINGS. THE DEFENDANT - APPELLANT WAS DENIED FULL OPPORTUNITY TO PREPARE HIS DEFENSES AND MAKE TACTICAL DECISIONS WITH THE AID OF THESE INFORMATION, AND A COURT CAN AND SHOULD TAKE NOTICE OF THESE CASES.

"PETERS" PUTS FORTH HIS REASONS FOR THE ARGUMENT THAT THE PLAIN ERROR STANDARD APPLIES TO "PETERS" DENIAL OF A FAIR TRIAL BY THE COURT AND HIS OFFICER KATHERINE M. KEEFE. FIRST, "PETERS" INCORPORATES THE PREVIOUS FOUR PARAGRAPHS AND REALLIGES TO THIS PARAGRAPH BY REFERENCE THOSE REASONS, AND WHAT SHOULD HAVE BEEN PROPER ADMINISTRATIVE ACTIONS, WHICH WERE NOT FOLLOWED. JENCKS-V-UNITED STATES, BRADY-V-MARYLAND, UNITED STATES CONSTITUTION AMEND XIV, ILL CONST. 1970 ART I, §8, §6, ILL SUPREME COURT RULE 608, ILL SUPREME COURT RULE 321, ILLINOIS SUPREME COURT MANUAL ON (EXHIBIT) RECORD KEEPING, TRIAL COURT ORDER ROA C345, 346, PEOPLE-V-AGUILAR 218 ILL. APP. 3d 1, 9, 10, (1ST DIST 1991). PREVIOUSLY, BEFORE THE APPELLATE COURT OF THE SECOND DISTRICT IN CASE 02-15-0650 NUMEROUS CUMULATIVE ERRORS WERE DOCUMENTED BY APPELLATE DEFENDER SILVERN, A COURT MAY TAKE NOTICE OF CASES AND RECORDS OF OTHER COURTS OR THEIR OWN. PEOPLE-V-GRAU (2ND DIST) THIS COURT DECIDED EVEN THOUGH THEY WERE ERRORS SUCH AS THE ZEHLE ERROR THEY DIDN'T AMOUNT TO PLAIN ERROR. HOWEVER, AS NOTED IN THAT CASE BECAUSE OF THE ISSUES OUTLINED IN THE INSTANT CASE, APPELLATE DEFENDER SILVERN COULD NOT HAVE HAD FULL OPPORTUNITY OR A RECORD COMPLETE WITH EVIDENCE TO PUT FORTH AND MAKE TACTICAL DECISIONS BASED ON THE RECORD, BECAUSE "KEEFE" HAD CONCEALED, DISGUISED AND OBSTRUCTED MATERIALS AND EVIDENCE FROM "PETERS" BECAUSE EVERY EXPERIENCED TRIAL JUDGE AND LAWYER KNOWS THE VALUE FOR IMPEACHMENT PURPOSES OF THE WITNESS RECORDING EVENTS

REASONS FOR GRANTING

Before Time dulls treacherous memory, *Jencks v. U.S.* [2], "PETERS" cannot determine if her being opposed by the court in its constant denial of production to him since the trial court, OR THE COURT'S CLERK "Keefe" who is taking it on her own to disregard judicial ORDERS of the court and making her own ruling. It's clear that "Keefe" has violated a court order, THE RECORD of the certification UNDER OATH, AND THE ILLINOIS SUPREME COURT MANUAL ON RECORD KEEPING. see RON C345-346, ILS. CH MANUAL ON RECORD KEEPING, ILS. CH RLE 608. But a broader question is AFTER FIVE CONTINUOUS YEARS of the court's denial to "PETERS" of these materials documents. AND HIS painstaking exposure as outlined in this brief of one or two at a time, THE COURT AND ITS JUDGE NOW STILL UNFAIRLY STATES "PETERS" SHOULD NOW GO INTO HIS LAST CHANCE TO SHOW HIS INNOCENCE WITHOUT A COMPLETE RECORD, OR FULL OPPORTUNITY TO PREPARE A DEFENSE OR MAKE TACTICAL DECISIONS WITH THE AID OF THE INFORMATION. IN A SENTENCE "PETERS" BELIEVES THE COURT HAS ALSO CREATED A PATTERN OF INTENTIONAL ABUSE OF DISCRETION THAT SO SERIOUSLY UNDERMINED THE INTEGRITY OF "PETERS" JUDICIAL PROCEEDINGS AS SUPPORTS REVERSAL UNDER THE PLAIN ERROR DOCTRINE AS APPLIES ONLY TO THE FILES IN THIS BRIEF. "PETERS" HOWEVER, HAS NEVER BEEN ABLE TO SEE THE DOCUMENTS, THERE HAS BEEN NO HEARING ON THEM NOR CAN IT EVEN BE TOLD WHAT IS IN THEM. EVEN IF THE COURT AND JUDGE WOULD STATE THEY WITHHELD THEM FOR ANY UNSTATED REASON. IT WOULD BE AND QUALIFY AS AN ABUSE OF DISCRETION AS IT STATES IN *JENCKS-V- U.S.* 10M [6][7][8] THE PRACTICE OF PRODUCING GOVERNMENT DOCUMENTS TO THE TRIAL JUDGE FOR HER DETERMINATION OF RELEVANCY AND MATERIALITY, WITHOUT HEARING THE ACCUSED, IS DISAPPROVED. "PETERS" NEVER WAS ABLE TO ATTEND ANY SUCH HEARING NOR DOES THE RECORD AS IT STANDS CERTIFIED EVEN SHOW ANY SUCH HEARING TOOK PLACE (SEE C1, CC, I, II, III, IV, V, Pgs 1 of 8.). THE REVIEWING COURT MUST INVOLVE THE PLAIN ERROR RULE TO REVIEW ALLEGED ERRORS NOT PROPERLY PRESERVED WHEN (1) THE ERROR IS SO FUNDAMENTAL AND OF SUCH MAGNITUDE THAT THE ACCUSED IS DENIED THE RIGHT TO A FAIR TRIAL AND REMEDYING THE ERROR IS NECESSARY TO PRESERVE THE INTEGRITY OF THE JUDICIAL PROCESS ILS. CH RLE 615, IN *JENCKS* CITING BOTH *U.S. V- ANDOLSCHEK*

Reasons for Granting

AND ROVIERO v - UNITED STATES, THE UNITED STATES SUPREME COURT HOLDS, THAT THE CRIMINAL ACTION MUST BE DISMISSED WHEN THE GOVERNMENT, ON THE GROUND OF PRIVILEGE, ELECTS NOT TO COMPLY WITH AN ORDER TO PRODUCE, FOR THE ACCUSED'S INSPECTION AND FOR ADMISSION IN EVIDENCE, RELEVANT STATEMENTS OR REPORTS IN ITS POSSESSION OR GOVERNMENT WITNESSES TOUCHING THE SUBJECT MATTER OF THEIR TESTIMONY AT THE TRIAL. "PETERS" HAS PROVEN THROUGHOUT HE HAS BEEN DILIGENT IN HIS ATTEMPTS TO PROCURE THIS MATERIAL EVIDENCE. WHERE "PETERS" MADE CLEAR MANESS, SAKREWITZ AND LUNA CRUCIAL GOVERNMENT WITNESSES SUPPLIED PRINCIPLE EVIDENCE RELATING TO THE PERIOD IMMEDIATELY SURROUNDING THE FILING OF FALSE AFFIDAVITS SUPPORTING DOCUMENTS IN THESE ALLEGED MR SEARCH WARRANT CASES OR JUST MR CASES AS THESE CONTENDS ARE ALLEGED AS SEARCH WARRANT CASES (SEE 18CHSY para 18) A COURT SHOULD TAKE NOTICE OF THIS CASE AND MAY TAKE NOTICE OF IT. PEOPLE V - GRAU. DIRECT EXAMINATION BROUGHT OUT THE FACT THAT EACH HAD MADE ORAL OR WRITTEN REPORTS TO THE STATE AND COURT RELATING TO RESPECTIVE EVENTS ABOUT WHICH THEY TESTIFIED. (R 517, 585, 661) JENCKS V - U.S. 775. CT. 1007. "PETERS" IS ALSO CLEAR THE PURPOSE OF HIS REQUESTS IS TO IMPEACH THE CREDIBILITY OF THESE CRUCIAL GOVERNMENT WITNESSES SOMETHING NO ONE WANTS TO ALLOW. OR DO. DID NOT ALLOW AND DEPRIVED "PETERS" FULL OPPORTUNITY TO PREPARE HIS DEFENSES AND MAKE TACTICAL DECISIONS WITH THE AID OF THIS INFORMATION. PEOPLE V. AGUILAR 28 R11. App. 3d, 1, 9, 10 (1ST DIST 1991) BRADY V. MARYLAND 373 U.S. 83. INFORMATION SO CRUCIAL IT COULD PROVE "PETERS" LAWFULL INNOCENCE AND CALL INTO QUESTION THE GOVERNMENT'S CASE CONTRARY TO THE FACTS PRODUCED SHOWING ORAL OR WRITTEN STATEMENTS CONTRADICT WITNESS TRIAL TESTIMONY. "PETERS" ASKS THIS COURT TO CONSIDER EVERY REASONABLE HYPOTHESIS EVOLVING FROM THE REASON THIS EVIDENCE HAS BEEN CONCEALED AND OBSTRUCTED SO IT COULD NOT BE USED TO PREPARE A DEFENSE OR BENEFIT FROM TACTICAL DECISIONS. IF "PETERS" COULD PROVE HIS LAWFULL INNOCENCE BY WAY OF A FAIR TRIAL THE COURT, STATE, PUBLIC DEFENDERS WHO ALL WORK WITH THE STATE'S ATTORNEY'S DEPARTMENT EACH AND EVERY DAY WOULD BE

REASONS FOR GRANTING

SUSCEPTIBLE TO DAMAGES. AND THE POLICE ERRORED COULD BE FURTHER SUSCEPTIBLE TO PRISON. DOUBTFULL THE STATE, COURT AND PUBLIC DEFENDERS DO NOT KNOW, THE POLICE ERRORED. THE SHERIFF HAD GOOD REASON TO CONCEAL OBSTRUCT EVIDENCE, EVEN USE OFFICER SATKIEWICZ HUSBAND A SARGENT MAJOR ON THE ILLINOIS STATE POLICE WHO WOULD INVESTIGATE ANY SUCH ERRORS. (R634) INSTEAD OF ADMITTING ANY ERROR WHICH AT THE LEAST WOULD END A CAREER IN LAW ENFORCEMENT AND POSS. BLU TAIL TIME FOR ALL INVOLVED. INCLUDING THE SARGENT MAJORS WIFE. IN THERE POSITION IT WOULD BE EASIER TO IMPLICATE "PETERS". AND ABSOLVES McHENRY COUNTY BECAUSE OF A SITUATION SUCH AS THIS FACING MILLIONS OF DOLLARS OF DAMAGES FROM "PETERS" HAD GOOD REASON, WHICH BEGS THE QUESTION WHY SUPPRESS THE VIDEO FROM "PETERS" TWO CAMERA SYSTEMS, IF THERE INTERESTED IN THE TRUTH. WHICH WERE THERE THREE SURVEILLANCE SYSTEMS INCLUDING THE ONE IN SATKIEWICZ CAR WHICH HAVE MYSTERIOUSLY FAILED. AND DOES THE FACT THESE MATERIALS ASKED FOR, CONTINUE TO BE CONCEALED AND OBSTRUCTED AND ITS THE COURTS PLAN TO WITHHOLD THEM THROUGH "PETERS" LAST REMEDY. AS HE HAS BEEN HERE DEPRIVED OF EACH AND EVERY ONE PREVIOUSLY AS STATED, 02-15-650, 02-16-0289, 02-18-929, 18CH54, 02-17-0857. CONCEALING AND OBSTRUCTING A DEFENSE DOES NOT APPEAR TO BE CONDUCTIVE TO THE TRUTH. AND NO ONE CAN SAY "PETERS" COULD HAVE NOT PRESENTED A MORE EFFECTIVE DEFENSE GIVEN ADEQUATE TIME TO INVESTIGATE AND USE THIS OBSTRUCTED AND CONCEALED MATERIALS. PEOPLE V- AGUILAR 218 ILL. APP. 3D 1, 9, 10 (5TH DISH 1991). THE COURT, THE STATE, THE PUBLIC DEFENDERS OFFICE AND SHERIFF ALL HAD A GREAT DEAL TO LOOSE. HOWEVER, THE PERSON OR OFFICE CAUGHT HERE IS THE CLERK FOR THE TWENTY-SECOND CIRCUIT, "KEEFE" WHEN SHE OBSTRUCTED "PETERS" DISGUISED AND CONCEALING MATERIAL EVIDENCE NEEDED FOR "PETERS" DEFENSE AND TO PROVE A NARRATIVE OTHER THAN THE STATES. AND IN DOING SO VIOLATED BRADY V- MARYLAND 373 U.S. 83 (PETERS BAR TRIAL) JENCKS V- U.S. (PETERS EVIDENCE) UNITED STATES CONSTITUTION XIV, ILLINOIS SUPREME COURT RULE 608, AND THE ORDER OF THE COURT (C345-346), ILLINOIS SUPREME COURT RULE 615, ILLINOIS CONSTITUTION 1970, ART I, § 8, § 6, § 2, ILLINOIS SUPREME COURT MANUAL ON RECORD KEEPING, (ALL EXHIBITS).

Argument

(SEE EXHIBIT A)

29.) "State" says THERE MUST BE "GOOD CAUSE" SHOWN TO RECEIVE MATERIALS "PETERS" SHOULD ALREADY HAVE HAD. THE CALIFORNIA SUPREME COURT RECENTLY DISPELLED THAT IDEA WHEN IT SAID "GOOD CAUSE" DOES NOT APPLY TO REQUESTS FOR "DISCOVERY" HELD BY THE COURT. STATE V- CALIFORNIA SUPERIOR COURT 444 P.3D 700 (CAL 2019). CALIFORNIA MUST HAVE IT RIGHT, HOWEVER, "STATE" ATTEMPTING TO BEND TO ITS OBSTACLES AND CONCEALMENT NARRATIVE CITES "FAIR", BUT THE DIXON COURT HAS A DIFFERENT NARRATIVE ON FAIR, AND "GOOD CAUSE" AT "THE TRIAL COURT DENIED DIXON ACCESS, IN PART, BECAUSE THE COURT BELIEVED HE WAS 'FISHING'". WE DISAGREE, AND FIND OUR SUPREME COURT'S DECISION IN FAIR TO BE DUSKEVETIVE, [P33] THE SUPREME COURT REJECTED THE STATES ARGUMENT IN "FAIR", STRESSED IT WOULD PUT POST-CONVICTION PETITIONERS IN AN IMPOSSIBLE DILEMMA TO SEEK OUT EVIDENCE THAT THERE IS A NEXUS BETWEEN (THE EVIDENCE REQUESTED) AND PETITIONERS TAKE ONLY IF HE OR [SHE] ALREADY POSSESS SUCH EVIDENCE ("FAIR" AT 266-67) THAT PUTS (PETERS, DIXON TO THE IMPOSSIBLE TASK OF USING THE EVIDENCE HE IS REQUESTING TO PROVE HIS NEED FOR THE EVIDENCE." PEOPLE V- FAIR 193 ILL.2D 256. PEOPLE V- DIXON 2019 ILL. APP. 1ST 160443, 2019 ILL. APP. LEXIS 410 (PETERS 2-1401)

30.) A FEDERAL UNITED STATES SUPREME COURT CASE IDENTICALLY SUITED TO THESE TWO CASES SHOWING THE ERROR IN STATES THINKING AND ERROR IN "PETERS" CASE IS UNITED STATES V- BURR 25 Fed. CAS. AT PAGE 187 STATES IF A PAPER BE IN POSSESSION OF THE OPPOSITE PARTY, WHAT STATEMENT OF CFS CONTENTS CAN BE EXPECTED FROM THE PERSON WHO CLAIMS ITS PROTECTION. IT IS OBJECTED THAT PARTICULAR PASSAGES OF THE LETTER ARE NOT POINTED OUT, HOW CAN THIS BE DONE WHEN THE LETTER IS BEING WITHHELD. 25 Fed. CAS AT PAGE 191.

31.) UNITED STATES V- REYNOLDS 345 U.S. 1 THE GOVERNMENT CAN INVOKE ITS EVIDENTIARY PRIVILEGES ONLY AT THE PRICE OF LETTING THE DEFENDANT GO FREE.

32.) "STATE" SAYS "DEFENDANT HAS THE TRIAL RECORD". BUT WHAT TRIAL RECORD DOES THE DEFENDANT HAVE, THE ONE THE "STATE" AND THE COURTS WANT HIM TO HAVE OR BETTER THE ONE THE "STATE", THE COURTS AND STATES PUBLIC DEFENDER OFFICES WANTS HIM TO HAVE. IN FOUR AND ONE HALF YEARS "PETERS" HAS UNCOVERED TWENTY CASES/FILES AS SHOWN (C.447). HOW MANY MORE. AVERAGE OF FIVE FILES/CASES A YEAR EXPOSED. THIS IS NOT A BELATED REQUEST, ITS A CONTINUING REQUEST WHERE A RECENT LAW SUE TWENTY-SECOND CIRCUIT CASE 18CIT54 EXPOSED ELEVEN MORE CASES/FILES

ARGUMENT

33.) IN AN ATTORNEY GENERALS FILING OF 13 JULY 2018, THE PRESENT FILED 16 SEPTEMBER 18, FOR THE COURT MAY TAKE NOTICE OF ITS OWN CASES 0019-244. THIS CASE A CIVIL SUIT USED AS A VEHICLE TO ATTEMPT TO OBTAIN 11 MORE CASES/FILES, ALTHOUGH "PETERS" WAS NOT SUCCESSFUL IN HIS WINNING THE SUIT. IN "PETERS" OPINION DUE TO THE SAME POLITICAL OPPOSITION FROM COURT MANIPULATION AND MANIPULATION BY THE STATE. HOWEVER, IN ITS LOSS IT CAUSED AN UNEXPECTED MOVE BY THE ATTORNEY GENERAL IN THE RELEASE OF YET AGAIN MORE OBSTRUCTED AND CONCEALED CASES/FILES, EVIDENCED BY THE FACT WHEN "PETERS" ASKED FOR THEM BY LETTER THE CLERK UNDER RULES OF RECORD KEEPING ILS-CL IS TO PRODUCE THE FILE NO'S SHE DID NOT. "PETERS" SUED AND THE AG PRODUCED 11 MORE FILES, DISGUISED, OBSTRUCTED AND CONCEALED FROM HIM. THEY WERE ALSO OBSTRUCTED BY COURT ORDER WITHOUT NOTICE AND HEARING, AN ABUSE OF DISCRETION. "PETERS" ATTEMPTS TO EXPOSE.

34.) THE ONLY APPROPRIATE ACTION BY THE CIRCUIT COURT WAS A HEARING. THE COURT HAS BEEN ABUSING ITS DISCRETION SINCE THE CASE WAS BROUGHT BEFORE PEATERS COURT AND THE COURTS RECORD REFLECTS ITS UNFAIRNESS, AS "PETERS" CONTINUES TO ATTEST TO HIS LAWFUL INNOCENCE.

35.) "PETERS" STATES IT NOW APPEARS THE STATE IN ITS DO ANYTHING SAY ANYTHING ATTITUDE TO KEEP AN UNLAWFUL CONVICTION INTACT, NOW EMPLOYS JUDICIAL ESTOPPLE WHERE IF HE CANNOT SUCCEED IN HIS REVESTMENT ARGUMENT THEN HE WILL WIN IN HIS ALTERNATIVE ARGUMENT. IT FAILS.

36.) "STATE" SAYS IN THERE REVESTMENT ARGUMENT "THE PEOPLE (P17) DID NOT PARTICIPATE AT ALL". HOWEVER, IN THERE NOTICE ARGUMENT "STATE" SAYS "THE PURPOSE OF THE NOTICE OF APPEAL IS TO INFORM THE PREVAILING PARTY IN THE TRIAL COURT THAT THE OTHER PARTY SEEKS REVIEW OF JUDGEMENT". Burtell-v. First Charter Service Corp 76 IL 2d 427, 435 (1979)

(P17) ACCORDING TO THESE STATEMENTS THE "STATE" PREVAILLED BY JUDGEMENT IN THE TRIAL COURT. "PETERS" STATES THE STATEMENT INCULCATES THEM AS PARTICIPATING IN THE ACTION, AS THE "STATE" HAD PARTICIPATED AS SHOWN;

37.) "PETERS" STATES THE CASE WAS CALLED NONE OBJECTED, THE "STATE" WAS PRESENT AND STATED; "MR PETERS" HAS FILED SOME TYPE OF PROSE MOTION THAT APPEARS TO BE ASKING THE COURT TO TURN OVER TO HIM EXCULPATORY EVIDENCE" (C445, R1134).

Argument

38.) "PETERS" STATES IT APPEARS THE "STATE" ARGUMENT FOR REVESTMENT IS A CLEAR WIN FOR HIM. IN THAT IT MEETS ALL THE CRITERION, HE HIMSELF SETS OUT, ① BOTH PARTIES ACTIVELY PARTICIPATED IN THIS PROCEEDING (C445, R1134), ② NO ONE OBJECTED TO THE PROCEEDING, ③ THE PROCEEDING INCONSISTENT WITH MERITS OF THE PRIOR OBJECTION AND SUPPORTS SETTING ASIDE THAT JUDGMENT BY OBSTRUCTION, CONCEALMENT AND DISGUISE OF THE ITEMS IN QUESTION. (UNITED STATES V- REYNOLDS 345 U.S. 1 "THE GOVERNMENT CAN INVOLVE ITS EVIDENTIARY PRIVILEGES ONLY AT THE PRICE OF LETTING THE DEFENDANT GO FREE"). ALL OF THE REQUIREMENTS HAVE BEEN MET AND REVEST HE COURT PEOPLE V- BRIBBY 2014 IL 115459, 9125. "STATE" SAYS "PETERS" DID NOT PARTICIPATE. INCORRECT, IF GOING BY OTHER CASES IN THE TWENTY-SECOND CIRCUIT. CASE IS LA90 STATES "PETERS" PARTICIPATED THOUGH NEVER THERE. HMM?

39.) "UNDER THE CURRENT ILLINOIS CONSTITUTION, ARTICLE II, SECTION 9, TRIAL COURTS HAVE SUBJECT MATTER JURISDICTION TO HEAR ALL 'JUSTICIBLE MATTERS' MEANING ANY CONTROVERSY APPROPRIATE FOR REVIEW BY THE COURT, IN THAT IT IS DEFINITE AND CONCRETE, AS OPPOSED TO HYPOTHETICAL OR MOOT, TOUCHING UPON THE LEGAL RELATIONS OF PARTIES HAVING ADVERSE LEGAL INTERESTS." PEOPLE V- CASHIE BERRY 2015 IL 116916 11-12. THE COURT COMMANDS SUBJECT MATTER JURISDICTION REGARDLESS OF "STATE".

40.) "STATE" ALSO GOES ON IN ITS ASSESSMENT OF JURISDICTIONAL STEPS AND STATES SUPREME COURT RULE 303(b)(2) PROVIDES THAT "PETERS" FAILED THIS STAGE, "PETERS" STATES THE ACCUSATION IS DEFICIENT. FIRST, ILSCT R 303 IS A CIVIL APPEAL WHICH CONFIRMS "PETERS" ALLEGATIONS AND THAT "STATE" BELIEVES CONTESTANT TOO. SIGNIFICANTLY, 303(b)(2) STATES "SHALL SPECIFY THE JUDGMENT OR PART THEREOF OR OTHER ORDERS APPEALED FROM AND THE RELIEF SOUGHT FROM THE REVIEWING COURT."

SIGNIFICANTLY, "PETERS" NOTIFIED HE "APPEALS THE DENIAL" (THE JUDGMENT) "WITHOUT REASON." "TO THE APPELLATE COURT SECOND DISTRICT," (THE COURT) "HOPES AND PRAYS FOR RELIEF" (FROM THE DENIAL). "STATE'S ARGUMENT IS NEGATED. (C447) AND IS ACCOMPANIED BY VERIFICATION BY CERTIFICATION NOTICE PROOF (CERTIFICATE OF FILING, SERVICE "STATES" ARGUMENT FAILS.

41.) "PETERS" STATES NOTHING IN STATES LAST PARAGRAPH IS RELEVANT. IT IS CONJECTURE. NO WHERE DOES ILSCT R 303 STATE DATES ARE REQUIRED. THERE IS NO GROUNDS FOR DISMISSAL BASED ON THIS PREMISE. ALL ELSE ADMITTED ABOVE.

42.) "PETERS" STATES BY THE GREAT LATITUDE OF THE ALLOWED DISCRETION OF THE TRIAL COURT, THIS COURT SHOULD NOT VACATE THE OBSTRUCTION CONCEALMENT AND DISGUISE OF "PETERS" EVIDENCE, IT SHOULD REMAIN FOR HEARING.

CONCLUSION

(2.) "PETERS" ASKS when THIS HONORABLE COURT will STOP THE BIAS. IT IS WELL AWARE OF THE ILLEGAL OBSTRUCTION BEING EMPLOYED BY THE COURT OF THE TWENTY-SECOND CIRCUIT AND ITS CLERK "KEEFE". THE QUESTIONABLE AND ILLEGAL OBSTRUCTION, CONCEALMENT AND DISGUISED TACTICS BEGAN THERE EXPOSURE WITH THE GARY GAUGER CASE, CONTINUE HERE IN EXPOSURE AND IS ONLY A MATTER OF TIME BEFORE THEY ARE FULLY AND COMPLETELY EXPOSED. RESULTING IN EXPOSURE OF ALL WHO HAD A HAND IN CONCEALMENT AGAIN. "EQUAL JUSTICE UNDER THE LAW" LET IT STOP HERE, Rule IN FAVOR OF "PETERS" THIS COURT DOES NOT CONSENT OF DIMMYS LOOK AT THE FACTS CLOSELY. ALLOW "PETERS" WHAT IS NEEDED TO PROVE HIS LAWFUL INNOCENCE OR LET HIM GO AS THE UNITED STATES SUPREME COURT IN U.S. v. REYNOLDS 345 U.S. 1, STATES, TO DO OTHERWISE IS TO CONDONE IT, AND DETRACTS FROM CREDIBILITY OF THE JUDICIAL PROCESS OF THIS NATION. IS THAT THE LEGACY TO BE SEEN.

Certificate of Compliance

I CERTIFY THAT THIS BRIEF CONFORMS TO THE REQUIREMENTS OF RULES 34(a) AND (b). THE LENGTH OF THIS BRIEF, EXCLUDING THE PAGES OR WORDS CONTAINED IN THE 34(d) COVER, THE RULE 34(b)(1) STATEMENT OF POINTS AND AUTHORITIES, THE RULE 34(c) CERTIFICATE OF COMPLIANCE, CERTIFICATE OF SERVICE, AND THOSE MATTERS APPENDED TO THE BRIEF UNDER RULE 34(9), IS 20 PAGES OR WORDS.

DATE: 17 December 2019

Respectfully,

(S) Scott Peters
SCOTT PETERS PRO SE