

20-7463 ORIGINAL
No. _____

PROVIDED TO HARDEE CORRECTIONAL
INSTITUTION 1-29-2021

FILED
JAN 28 2021
OFFICE OF THE CLERK
SUPREME COURT, U.S.

IN THE
SUPREME COURT OF THE UNITED STATES

OF AMERICA

Carlos Lorenzo Jackson — PETITIONER
(Your Name)

vs.

STATE OF FLORIDA — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

SUPREME COURT OF FLORIDA

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

PETITION FOR WRIT OF CERTIORARI

Carlos Lorenzo Jackson
(Your Name)

Hardee Correctional Institution
6901 State Road #62

(Address)

Bowling Green, Florida 33834

(City, State, Zip Code)

NONE

(Phone Number)

QUESTION(S) PRESENTED

- (1). WHETHER THE RULING DENYING THE PETITION FOR WRIT OF HABEAS CORPUS BY THE FLORIDA SUPREME COURT A DEPARTURE FROM THE ESSENTIAL REQUIREMENTS OF LAW AND ABANDONING OR FAILING TO FOLLOW ITS OWN PRECEDENT AND DECISIONS OF ITS APPELLATE COURTS AS SET FORTH IN THE RULES OF COURT AND OTHER LAWS OR DECREES?
- (2). WHETHER THE TRIAL COURT EXCEEDED ITS LAWFUL AUTHORITY BY ENTERING OTHER ORDERS DISPOSITIVE OF THE MERITS OF THE CASE WHILE A RULING ON THE RULE 3.850 MOTION FOR POST CONVICTION RELIEF WAS STILL PENDING ON REMAND FOR AN EVIDENTIARY HEARING?
- (3). WHETHER THE TRIAL COURT ENTERING A SECOND JUDGMENT AND SENTENCE BY THE SECOND OR SUCCESSOR COURT WHEN IT LACKED JURISDICTION TO DO SO VIOLATED THE DOUBLE JEOPARDY CLAUSES OF THE STATE AND FEDERAL CONSTITUTIONS AND WHETHER THE COURTS ACTIONS RESULTED IN A MISCARriage OF JUSTICE AND MANIFEST DISREGARD FOR LEGAL PRECEDENT
- (4). WHETHER A DEPARTURE FROM THE ESSENTIAL REQUIREMENTS OF THE LAW BY ~~THE~~ VACATING THE INITIAL PLEAS, JUDGMENTS, AND SENTENCES THAT ARE PRODUCTS OF GUILTY PLEAS BEFORE PREDECESSOR JUDGE AND SUBSEQUENTLY ENTER NEW JUDGMENTS AND SENTENCES WITHOUT A TRIAL, EITHER BENCH OR JURY TRIAL, NOR DID ~~THE~~ THE SUCCESSOR COURT ALLOW HIM TO PLEAD A NEW ~~TRIAL~~ PRIOR TO ENTERING THE ORDERS IN QUESTION AND RESULTING IN A CONVICTION OF ONE WHO IS ACTUALLY AND FACTUALLY INNOCENT?

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:

(1) Mark S. Inch – Secretary, Florida Dept. of Corrections.

Florida Dept. of Corrections
501 South Calhoun Street
Tallahassee, Florida 32399

(2) Ashley Moody – Att. General

The Office of the Attorney General
PL-01, The Capital
Tallahassee, Florida 32399

(3) Clerk of the Court

Third District Court of Appeal
2001 S.W. 117th Avenue
Miami, Florida 33175

(4) Clerk of the Court

Eleventh Judicial Circuit of Florida
1351 N.W. 12th Street
Miami, Florida 33125

(5) Hon. John Schlesinger – Circuit Judge

Eleventh Judicial Circuit of Florida
1351 N.W. 12th Street – Courtroom 4B
Miami, Florida 33125

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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 **federal courts**:

The opinion of the United States court of appeals appears at Appendix _____ 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 United States district court appears at Appendix _____ to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

☐ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix A to the petition and is

- ☐ reported at 110 Cite 18 of 45 Cases 8/20-1098; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the Florida Supreme Court court appears at Appendix B to the petition and is

- ☐ reported at 32-19-576 2019-12-3229552 (Fla. Sup. 18th 2019); or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was _____.

☐ No petition for rehearing was timely filed in my case.

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

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

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

☐ For cases from **state courts**:

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

☐ A timely petition for rehearing was thereafter denied on the following date: DEC 31st 2020, and a copy of the order denying rehearing appears at Appendix _____.

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

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

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

- (a). The Constitutional Right to Due Process and Equal Protection of the Law as described in Article I, Section 9 of the Florida Constitution, also the 5th and 14th Amendment U.S.C.A.
- (b). The Constitutional Right against Double Jeopardy violations as described in Article I, Section 9 of the Fla. Constitution
- (c). The Constitutional Right against cruel and unusual punishment as described in Article I, Section 17 of the Fla. Constitution and the Eighth Amendment U.S.C.A.
- (d). The Constitutional and Statutory right against being enslaved or placed in involuntary servitude or falsely imprisoned as described in the Thirteenth Amendment U.S.C.A. and s. § 787.02(1) Fla. Statutes.
- (e). The Constitutional and Statutory right to habeas corpus relief on the grounds that he is being illegally detained as described in Article I, Section 12 of the Florida Constitution and section § 79.01 Florida Statutes.

STATEMENT OF THE CASE

The Petitioner asserts that on December 21st, 1977, he was bound over from juvenile detention to the custody of Dade County, Dept of Corrections to be tried as an adult in Case No. 8 77-34723 and *78-1751, of the Eleventh Judicial Circuit of Florida.

On May 10th, 1978, the Petitioner appeared before the court with the Hon. John A. Tankley, Circuit Judge of the Eleventh Judicial Circuit of Florida, who took guilty and now contend pleas from the Petitioner and unconditionally accepted them as knowing and voluntarily entered. On May 22d, 1978, I was placed in the custody of H.R.S. to begin treatment as an Mentally Disordered Sex Offender as set forth in Fla Statute § 917.

Sentencing was deferred until after treatment. The Petitioner's treatment was terminated and he was returned to the custody of this court for sentencing in both cases.

On December 6th, 1979 the Petitioner was sentenced in both cases by the Hon. John A. Tankley, who ultimately imposed the following:

Seven Consecutive Life Terms plus (5) Years to be served consecutively with Case No. 78-1751 in Case No. 77-34723.

In Case No. 78-1751, the Petitioner was sentenced to two (5) five year sentences to run concurrently one another and to those sentences imposed in Case No. 77-34723. The Petitioner began serving those sentences in the Fla. Department of Corrections on December 21st, 1979, at Lake Butler, Florida.

By rule the court had up to 60 days from the imposition of the sentence to exercise its jurisdiction to mitigate or modify the sentence. See Rule 3.800 Fla. R. Crim. P. The court lacks jurisdiction to vacate, modify or mitigate a sentence under Fla. R. Crim. P. unless a motion for post conviction relief has been granted or the cause otherwise reversed by a higher court. Florida Courts have no jurisdiction to act contrary thereto. In the instant case it did act contrary to the law, as the Petitioner will show in the following paragraphs.

On July 15th, 1982, the Appellate Counsel for the Petitioner filed with the Circuit Court a Motion for Post Conviction Relief under Rule 3.850 Fla. R. Crim. P. which was summarily denied by the Hon. John A. Tankley, whom the Petitioner initially entered the guilty and now

contendre PLEAS. ~~uncontested~~

THE PETITIONER APPEALED TO THE THIRD DISTRICT COURT OF APPEAL AND THE CAUSE WAS REVERSED AND REMANDED WITH INSTRUCTIONS TO EITHER ATTACH THOSE PORTIONS OF THE RECORD WHICH CONCLUSIVELY SHOWS I AM ENTITLED TO NO RELIEF, OR CONDUCT AN EVIDENTIARY HEARING TO MAKE FINDINGS OF FACT AND CONCLUSIONS OF LAW AND ENTER ITS RULING THEREON. SEE: JACKSON V. STATE, 442 So. 2d 1070 (Fla. 3d DCA 1983), 3082-1877. THE APPELLATE COURT ISSUED ITS MANDATE, SETTING FORTH THE BOUNDS OF ITS INSTRUCTION, AND UNLESS GRANTED SPECIFIC PERMISSION TO DO SO IT HAS THE MINISTERIAL DUTY TO ABIDE BY ITS INSTRUCTION AND IS POWERLESS TO DO ANYTHING ELSE UNTIL IT FIRST COMPLIES WITH THE MANDATE. SEE PATTEN V. STATE, 531 So. 2d 213 (Fla. 2d D 1988). LAZZARO V. MOSEL, 508 So. 2d 544 (Fla. 3d DCA 1987). KETNER V. KETNER, 198 So. 3d 106 (Fla. 1st DCA 2016).

IN KETNER SUPRA, THE DISTRICT COURT OF APPEAL HELD THAT: "A TRIAL COURT MAY NOT EXCEED THE SPECIFIC INSTRUCTIONS CONTAINED IN AN OPINION REMANDING A CASE FOR FURTHER PROCEEDINGS." IN PATTEN V. STATE, SUPRA, THE COURT OBSERVED: "ABSENT PERMISSION TO DO SO THE TRIAL COURT IS WITHOUT AUTHORITY TO ALTER OR EVADE AN APPELLATE COURT MANDATE ON REMAND AND MUST GIVE PRECISE EFFECT TO THAT MANDATE."

ACCORDING TO THE LEGAL HOLDINGS IN THIS STATE IT IS IMPERMISSIBLE TO ENTER OTHER ORDERS PRIOR TO SATISFYING THE EXPRESS REQUIREMENTS OF THE MANDATE.

THE FACTS AND EVIDENCE WILL SHOW THAT ON ~~March 30th~~ MARCH 30th 1984, THE PETITIONER WAS BROUGHT BEFORE THE SUCCESSOR JUDGE THOMAS E. SCOTT, WHO PRESIDED OVER THIS CAUSE.

JUDGE SCOTT DID NOT RULE ON THE EVIDENTIARY HEARING BUT ORDERED INSTEAD THAT BOTH PARTIES FILE ADDITIONAL MEMORANDA. ON APRIL 11th 1984, ACCORDING TO THE MINUTE BOOK ENTRIES OF THE CLERK IN BOTH CASES A "MOTION TO SET ASIDE THE PLEA" WAS ENTERED AND GRANTED BY THE COURT. (SEE EXHIBIT - C, OF THE APPENDIX TO THIS PETITION LOCATED ON PAGE 8-9, OF THE APPENDIX THERETO). THIS IS IMPERMISSIBLE ON TWO LEVELS. FIRST, THE COURT ON MAY 10th 1978, WITH THE HON. JOHN A. TANKSLEY PRESIDING DID FORMALLY ACCEPT GUILTY AND NOLO CONTENDRE PLEAS AND ADJUDICATED ME GUILTY SHORTLY THEREAFTER. ~~It~~ IT WAS AT THIS POINT WHERE JEOPARDY ATTACHED AND THE COURT WAS PROHIBITED FROM VACATING OR SETTING ASIDE ITS OWN JUDGMENT AND SENTENCES AFTER 60 DAYS WITHOUT LEGAL CAUSE, AND TO DO SO WOULD SUBJECT THE PETITIONER TO VIOLATIONS OF THE DOUBLE JEOPARDY CLAUSES

OF THE STATE AND FEDERAL CONSTITUTIONS. *Rodriguez v. State*, 899 So. 2d 471 (Fla. 3d DCA 2005).

It is also well established under Florida law that when a defendant enters pleas of guilty and nolo contendere and it is accepted by the court, but later withdrawn it's as if it had never been entered and the parties are at the pre-arraignment stage and neither those pleas of guilty and nolo contendere can be put into evidence at any other proceeding either civil or criminal.

State v. McClain, 509 So. 2d 1360 (Fla. 2d DCA 1987), Rules 3.171(1) and 3.172(1) Fla. R. Crim. P. and s. 90.410 Fla. Evidence Code.

According to Fla. law and its rules of criminal procedure when the appellate issues a mandate, the lower tribunal has the ministerial duty to carry out that mandate expeditiously and is powerless to evade, modify or otherwise alter those instructions. In entering other orders during the pendency of carrying out its instructions is impermissible.

Not only did the trial court exceed its lawful authority in setting aside the guilty and nolo contendere pleas entered before the predecessor court on April 16th, 1984 but in furtherance of these constitutional deprivations of due process and equal protection of laws described herein the successor judge violated the prohibition against double jeopardy when on April 20th, 1984, the court vacated, set aside, and held for naught those judgments and sentences imposed by the predecessor court on May 10th, 1978, and December 6th, 1979, respectively, and "thereupon" it entered new judgments and sentences by separate order. (See: Exhibit D1 and D2 of the Appendix located on pages 11-12 of the appendix to this petition).

The Petitioner would also show that the Order Granting Motion For Post Conviction ~~Rehearing~~ was entered in absence of lawful authority and violated the double jeopardy clauses of the State and Federal Constitutions by entering a second conviction and sentence violated the double jeopardy clauses of the State and Federal Constitutions. Consequently its jurisdiction to move forward in its prosecution was lost because the initial judgments and sentences were entered upon guilty and nolo contendere pleas formally accepted the court. The successor judge lacked jurisdiction to enter a second judgment and sentence when: (a) the Petitioner pleaded guilty and nolo contendere before a different judge

unconditionally and who formally accepted those pleas and adjudicated him guilty.

The Petitioner began serving those sentences in the Fla. Dept. of Corrections on December 21st, 1979. The successor court in vacating the pleas judgments and sentences of the Petitioner on April 16th and 20th, 1984, violated the initial information as well and as such was precluded by state and federal law from carrying out its prosecution because ~~the~~ the state had not filed a new information on a different set of facts or research and refile the initial one. It failed to do either.

The Petitioner also avers that the second conviction entered by the successor judge not only violated double jeopardy, but evaded the mandate of the appellate court by entering those orders dispositive of the merits of the case prior to the trial court's ruling on the claims properly before it for an evidentiary hearing. See: *Nazzari v. Mosley*, 508 So. 2d 549 (Fla. 3d DCA 1987).

In Exhibit-F, which is the Official Record of the Clerk's Office, the ~~and~~ Order Granting Post Conviction Relief, which was entered at the conclusion of the evidentiary hearing was not ruled upon until April 23rd, 1984, which is 3 days after the trial court had already exceeded its lawful jurisdiction and entered other orders in violation of the appellate court's mandate, and committed double jeopardy violations by entering a second conviction against him for the same offenses he had entered guilty and now contend pleas to. See Exhibit-F, ~~in~~ the Appendix to this Petition located on pages 26-29 of the Appendix hereto.

The trial court lacked authority to proceed in its prosecution of the Petitioner when the second prosecution violates former jeopardy. *State v. Johnson*, 483 So. 2d 420 (Fla. 1986), ~~RM~~ *State v. State*, 603 So. 2d 61 (Fla. 3d DCA 1992), *Menna v. New York*, 423 U.S. 61, 96 S.Ct. 241, 46 L.Ed. 2d 95 (1975). It is a well established legal principle that mandamus lies to quash orders entered by a court lacking jurisdiction as well as to compel a court to enforce a mandate. If a lower tribunal deviates from, evades, modifies or alters the specific instructions of an appellate court's mandate then it has failed in its ministerial duty to carry out the orders of the appellate court. Mandamus lies to compel the trial court to perform its ministerial duties. This could be accomplished at any point in the proceedings because it would be a miscarriage of justice to allow a conviction and sentence entered without jurisdiction and in violation of the double

jeopardy clauses of the State and Federal Constitutions to stand.

The Petitioner is entitled to Mandamus relief by law and the Florida Supreme Court has failed to provide it departing from the essential requirements of the law, not following its own precedent, its District Courts of Appeal or the Rules of Court in denying me relief I am rightfully entitled to.

The evidence is irrefutable that the orders in question were entered without jurisdiction and as such should be quashed and further proceedings conducted from the point where the court granted the motion for post conviction relief. See Exhibit-F of the Appendix to this petition located on pages ~~24-29~~ ¹⁴⁻²⁴ 14 to 24-29 of the attachments.

This court should grant the writ as it is evident upon the face of the record that a fundamental miscarriage of justice exists that warrants immediate correction by the court. The Petitioner has evidenced that the trial court failed in its ministerial duty to carry out the instructions of the mandate without delay and lacks the authority to evade, modify or alter its command in any way shape or form. Proper remedy to enforce a mandate is either by motion or extraordinary writ. *Wincox v. Hotelama Assoc* 619 So. 2d 444 (Fla. 3d DCA 1993)

It is also proper to seek enforcement of a mandate by initiating a ~~separate~~ separate proceedings such as a petition for writ of mandamus.

Superior Cattle Intern. Inc. v. E&A Produce Co. 934 So. 2d. 484 (Fla. 3d DCA 2004).

REASONS FOR GRANTING WRIT

(1). CONFLICT WITH DECISIONS OF OTHER COURTS:

THE HOLDING OF THE FLORIDA SUPREME COURT IN THE INSTANT CASE IS THAT THE DENIAL OF ~~THE~~ PETITION FOR WRIT OF HABEAS CORPUS IS BASED UPON ITS RULING IN TOPPS V. STATE, 865 So. 2d. 1253 (Fla. 2004), WHICH IS ERRONEOUS AND FOR THE MOST PART AN ORDER WHICH SAYS NOTHING WITH RESPECT TO HIS CLAIMS.

(2). THE TOPPS CASE HINGES AROUND THE ACCUSED FILED A SECOND OR SUCCESSIVE EXTRAORDINARY TO A DIFFERENT COURT THAN THE ONE ORIGINALLY FILED IN, CITING SAME OR SIMILAR CLAIMS AND THOSE CLAIMS WERE EXPRESSLY ADDRESSED ON THE MERITS THEN THAT CLAIM CANNOT BE RELITIGATED IN ANOTHER FORUM.

IN THE CASE AT BAR THE PETITIONER FILED A PETITION FOR WRIT OF HABEAS CORPUS WITH THE FLA. SUPREME COURT IN 2019, CASE NO. #3C19-56, WHICH ASSERTED THAT THE CONVICTIONS AND SENTENCES ENTERED ON APRIL 20TH, 1984, BY THE SUCCESSOR JUDGE ~~WE~~ PRODUCTS OF FRAUD, COLLUSION, DECEIT, AND WERE ENTERED WITHOUT LAWFUL JURISDICTION AND IN SUBSEQUENT VIOLATIONS OF MY CONSTITUTIONAL RIGHTS TO DUE PROCESS, EQUAL PROTECTION OF LAWS, TO BE FREE FROM CRUEL AND UNUSUAL PUNISHMENT AND INVOLUNTARY SERVITUDE, THE RIGHT TO TRIAL ETC. ETC. THE COURT DID NOT ELABORATE OR GIVE AN EXPRESS OPINION ON THE CLAIMS MADE THEREIN, NOR DID IT EXPRESS THAT THE MERITS WERE EVEN CONSIDERED AND AS SUCH HE IS NOT BARRED FROM FILING THE SAME OR SIMILAR CLAIMS IN A DIFFERENT FORUM.

(3). THE DENIAL OF THE PETITION FOR WRIT OF HABEAS CORPUS IS IN ~~IN~~ CONFLICT WITH THE APPELLATE COURT'S DECISION, AND DEPARTS FROM THE ESSENTIAL REQUIREMENTS OF THE LAW TO CORRECT MANIFEST INJUSTICE OR A MISCARriage OF JUSTICE WHERE IT IS FOUND. IN THE INSTANT CASE THE COURT EXCEEDED ITS JURISDICTIONAL BOUNDS AND ENTERED ORDERS DISPOSITIVE OF THE CLAIMS WHILE THE EVIDENTIARY HEARINGS HAD NOT YET BEEN RULED UPON. MAZZARO V. MOLESER.

THE TRIAL COURT FURTHER EXCEEDED ITS JURISDICTION AND DENIED THE PETITIONER DUE PROCESS AND EQUAL PROTECTION OF LAWS RESULTING IN A CONVICTION OF ONE WHO IS ACTUALLY AND FACTUALLY INNOCENT WHEN ON APRIL 20TH, 1984, THE SUCCESSOR JUDGE, VACATED SET ASIDE AND HELD FOR NAUGHTY, THE JUDGMENTS AND SENTENCES OF THE PREDECESSOR COURT WHICH WERE THE RESULT OF PETITIONER ENTERING GUILTY AND NOLO CONTENDERE PLEAS BEFORE THE PREDECESSOR JUDGE JOHN A. TANKSLEY, AND ENTERING NEW JUDGMENTS AND SENTENCES FOR THE SAME OFFENSES SET FORTH IN THE INITIAL INFORMATION WITHOUT CONDUCTING A TRIAL OR HEAR PROCEEDINGS ON THE MATTER. ORDERS, JUDGMENTS AND DECREES ENTERED WITHOUT JURISDICTION AND FORMER JEOPARDY ARE PRODUCTS OF MANIFEST INJUSTICE AND DESERVE NO

PROTECTION FROM COLLATERAL ATTACK.

THE COURT'S DECISION IS IN DIRECT CONFLICT WITH ITS OWN HOLDINGS IN STATE V. McBRIDE, 848 So. 2d. 287 (Fla. 2003) and BATES V. STATE, 913 So. 2d. 742 (Fla. 4th DCA 2005) WHICH ASSESS THAT "WHERE THERE IS MANIFEST INJUSTICE THE COURT SHOULD DISREGARD THE DOCTRINES OF COLLATERAL ESTOPPEL ~~AND~~ RES JUDICATA, AND THE LAW OF THE CASE."

THE DENIAL OF THE PETITION IS IN DIRECT CONFLICT WITH THE THIRD DISTRICT COURT OF APPEALS DECISION IN LACRO V. STATE, 975 So. 2d. 613 (Fla. 3d DCA 2008), WHICH HELD THAT: "INVOKING THE MANIFEST INJUSTICE EXCEPTION AND HOLDING THE LAW OF THE CASE DID NOT APPLY WHEN DEFENDANT'S CONVICTION IS 'PATENTLY ILLEGAL'."

IN THE CASE AT BAR THE FACTS AND EVIDENCE SHOWS THAT THE ORDERS ENTERING A JUDGMENT AND SENTENCE ARE PATENTLY ILLEGAL AND SHOULD BE QUASHED WITH INSTRUCTIONS TO CONDUCT A NEW PROCEEDING CONSISTENT WITH THE REQUIREMENTS OF LAW AS SET FORTH IN THE STATUTES.

THESE ^{MIS. ADMISSIONS} ~~MISS. ADMISSIONS~~ HAVE RESULTED IN A CONVICTION OF ONE WHO IS ACTUALLY AND FACTUALLY INNOCENT AND AS A MATTER OF LAW SHOULD BE QUASHED.

FOR THE REASONS STATED HEREIN AND IN BEING CONSISTANT WITH ITS OWN PRECEDENT AND CONFLICT WITH ITS OWN DCAs THE FLA. SUPREME COURT IN ITS DENIAL DEPARTED FROM THE ESSENTIAL REQUIREMENTS OF THE LAW TO CORRECT MANIFEST INJUSTICE WHERE IT IS FOUND.

THIS COURT SHOULD REVERSE AND REMAND THE CAUSE TO THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT OF FLA. WITH INSTRUCTIONS TO VACATE THOSE JUDGMENTS ERRONEOUSLY ENTERED WITHOUT JURISDICTION BY THE SUCCESSOR JUDGE IN THIS CASE, AND TO CONDUCT OTHER OR FURTHER PROCEEDING CONSISTENT WITH THE LAWS OF THIS STATE AND THE FEDERAL CONSTITUTION.

CONCLUSION

I RESPECTFULLY PRAY THAT THIS COURT ACCEPTS discretionary jurisdiction and
ISSUES AN ORDER TO THE LOWER TRIBUNAL TO QUASH THE ORDERS IN QUESTION AND
CONDUCT WHATEVER PROCEEDINGS AS ARE DEEMED JUST AND PROPER.

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Carlene Lorenzo Jackson #071486

Date: ~~January 28th, 2021~~
January 28th, 2021