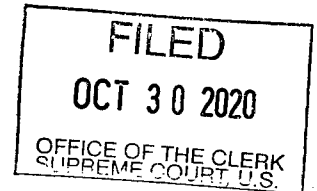


20-7538 ORIGINAL
No. _____



IN THE

SUPREME COURT OF THE UNITED STATES

WASHINGTON, DC 20543

FRANKIE JONES — PETITIONER
(Your Name)

vs.

SUPERIOR COURT OF GLYNN COUNTY — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

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

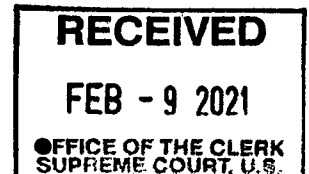
PETITION FOR WRIT OF CERTIORARI

FRANKIE JONES GDC #551281
(Your Name)

TELFAIR STATE PRISON P.O. BOX 549
(Address)

HELENA, GEORGIA 31037
(City, State, Zip Code)

(Phone Number)



QUESTION(S) PRESENTED

(A.) DOES A PETITIONER RECEIVE DISMISSAL OR A CONVICTION AND SENTENCE AS VOID IN LIEU OF A VIOLATION OF INTERSTATE AGREEMENT ON DETAINERS.

(B.) IN VIOLATION OF PETITIONER SIXTH AND FOURTEENTH AMENDMENT AS GOOD CAUSE TO GRANT SAID MOTION THE PETITIONER WOULD SHOW THE FOLLOWING, THE TRIAL COURT VIOLATED BY GRANTING CONTINUANCES FOR NO REASON OR GOOD CAUSE SHOWN. IN VIOLATION OF TIME LIMITATION ON INTERSTATE AGREEMENT ON DETAINERS.

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:

RELATED CASES

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- APPENDIX B : THE SUPREME COURT OF GEORGIA ORDER DISMISSING PETITIONER APPEAL AND MOTION.
- APPENDIX C : THE SUPERIOR COURT OF GLYNN COUNTY ORDER DISMISSING PETITIONER MOTION.
- APPENDIX D : COPY OF TRIAL COURT VIOLATING INTERSTATE AGREEMENT ON DETAINER.
- APPENDIX E : COPY OF INTERSTATE AGREEMENT ON DETAINERS.
- APPENDIX F : COPY OF MOTION TO DISMISS AND THE ORDER DENYING PETITIONERS MOTION.

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 B to the petition and is

☐ reported at NA; 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☒ is unpublished.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 NONE 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 B 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 GLYNN COUNTY SUPERIOR court appears at Appendix B, C to the petition and is

☐ reported at _____; 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 DEC. 1, 2020 (date) on FEB. 1, 2020 (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 OCT. 5, 2020.
A copy of that decision appears at Appendix 3.

☐ A timely petition for rehearing was thereafter denied on the following date: NO VTE, 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. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

6th Amendment of the United States
Constitution - Right to 180 day Interstate
AGREEMENT ON DETAINERS.

14th Amendment of the United States
Constitution - Right to Dismiss Convic-
tion and Sentence due to violation of
the I.A.D.

6th and 14th Amendment of the United
States Constitution - Trial Court viola-
ted by granting continuance for no
reason or good cause shown.

TABLE OF AUTHORITIES CITED

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STATUTES AND RULES

28 U.S.C. § 1257

28 U.S.C. § 2402(b)

18 U.S.C. § 3161(b)

OFFICIAL CODE GEORGIA ANNOTATED

O.C.G.A. SEC. 42-6-20

O.C.G.A. SEC. 77-501(b)

O.C.G.A. SEC. 77-504(b)

ARTICLE V(c) I.A.D

STATEMENT OF CASE

THE RECORD WILL SHOW IN THE CASE AT BAR THAT ON 20 SEPTEMBER 2002 THE PETITIONER FILED FOR AN INTERSTATE AGREEMENT ON DETAINERS. AFTER BEING SENT TWO DETAINERS FROM THE GLYNN COUNTY POLICE DEPARTMENT FOR FELONY MURDER WHILE HE WAS INCARCERATED IN FEDERAL PRISON ON UNRELATED OFFENSES. ON 20 NOVEMBER, 2002 PETITIONER WAS INDICTED BY A GLYNN COUNTY GRAND JURY AFTER THE PETITIONER EFFECTIVELY ACTIVATED THE TOLLING OF THE 180-DAYS TO BRING THE PETITIONER TO TRIAL. THE PETITIONER WILL ALSO SHOW THAT HE ATTEMPTED TO RESOLVE THE DETAINER VIA INTERSTATE AGREEMENT AND DETAINERS ACCORDINGLY ON 9 JANUARY, 2004. BY FILING A MOTION TO DISMISS FOR FAILURE TO PROSECUTE, ON A FEDERAL CONSTITUTIONAL VIOLATION. WITH RESPECT TO A CRIMINAL TRIAL WITHIN THE 180-DAYS OF O.C.G. A § 47-6-20 ARTICLE III (a) AND THE UNITED STATES CONSTITUTION AMENDMENT IV.

THE PETITIONER WOULD THEN SHOW THAT HE WAS NOT TAKEN TO TRIAL IN THE CASE AT BAR UNTIL 22 MARCH, 2004 487 DAYS

AFTER THE PROVISIONS OF THE I.A.W. HAD BEEN ACTIVATED. THE RECORD WILL SHOW THAT THE TRIAL COURT CONTINUED THE CASE ON 19 MAY, 2003 WITHOUT A SHOWING OF GOOD CAUSE OR FOR REASONS UNKNOWN. WHICH RESULTED IN A 307 DAY TOLLING PERIOD BEFORE THE PETITIONER WAS TAKEN TO TRIAL. SUBSEQUENTLY, THE PETITIONER WAS CONVICTED AT TRIAL AND THE DIRECT APPEAL OF THE CONVICTION WAS DENIED BY THE SUPREME COURT OF GEORGIA ON 26 FEBRUARY 2007 -

ON 21 NOVEMBER, 2019 THE PETITIONER SUBMITTED A MOTION TO DISMISS CONVICTION AND SENTENCE AS VOID IN LIEU OF VIOLATION OF INTERSTATE AGREEMENT ON DETAINERS; THE TRIAL COURT DENIED THE MOTION ON 30 MARCH, 2020; A TIMELY NOTICE OF APPEAL WAS FILED ON 14 APRIL, 2020 AND THE CASE WAS DOCKETED IN THE SUPREME COURT OF GEORGIA ON 11 SEPTEMBER, 2020.

THE COURT DISMISSED THE PETITIONER APPEAL ON THE 5 OCTOBER, 2020. THE PETITIONER NOW BRINGS THIS INSTANT CERTIORARI RAISING ONE ISSUE FOR PETITIONER REVIEW.

REASON FOR GRANTING THE WRIT

THE TRIAL COURT ERRED IN FINDING IN ITS FINAL ORDER THAT A CONTINUANCE WAS GRANTED FOR GOOD CAUSE WHICH WOULD EQUITABLY TOLL OR EXCUSE THE 180 DAY DEADLINE TO BRING THE PETITIONER TO TRIAL UNDER THE PROVISIONS OF THE INTERSTATE AGREEMENT ON DETAINERS AS THE RECORD REFLECTS NO NECESSARY OR REASONABLE CAUSE TO ISSUE A CONTINUANCE WHICH RESULTED IN THE PETITIONER BEING TRIED 307 DAYS AFTER THE 180 DAY I.A.D. DEADLINE HAD ELAPSED THUS DENYING THE PETITIONER HIS SIXTH AND FOURTEENTH AMENDMENT RIGHTS UNDER THE U.S. CONSTITUTION.

PURSUANT TO C.I.C.G.A. SEC. 42-6-20, ENACTMENT AND TEXT OF AGREEMENT, IT STATES IN PERTINENT PART AS FOLLOWS;

"... THE CONTRACTING STATES SOLEMNLY AGREE THAT...;
ARTICLE VII (a)... HE SHALL BE

BROUGHT TO TRIAL WITHIN ONE HUNDRED EIGHTY DAYS AFTER HE SHALL HAVE CAUSED TO BE DELIVERED TO THE PROSECUTING OFFICER AND THE APPROPRIATE COURT OF THE PROSECUTING OFFICER'S JURISDICTION WRITTEN NOTICE OF THE PLACE OF HIS IMPRISONMENT AND HIS REQUEST FOR A FINAL DISPOSITION TO BE MADE OF THE INDICTMENT, INFORMATION OR COMPLAINT, PROVIDED THAT FOR GOOD CAUSE SHOWN IN OPEN COURT, THE PRISONER OR HIS COUNSEL BEING PRESENT, THE COURT HAVING JURISDICTION OF THE MATTER MAY GRANT ANY NECESSARY OR REASONABLE CONTINUANCE..."

THE RECORD WILL INDICATE THAT THE PETITIONER BEGAN PROCEEDINGS TO RESOLVE THE DETAINER ON 20 SEPTEMBER, 2002. ACCORDINGLY, ON 20 NOVEMBER, 2002 THE PETITIONER WAS INDICTED FOR THE OFFENSE OF MURDER WHICH ACTIVATED THE 180 DAY TOLLING PERIOD UNDER THE INTERSTATE AGREEMENT ON DETAINERS IN WHICH TO BRING THE PETITIONER TO TRIAL. BERNICK V. STATE, 182 GA. APP. 329 (1987), THE TIME LINE IN THIS CASE AS CONCERNS THE TOLLING OF THE 180 DAYS IS AS FOLLOWS;

(i) 20 NOVEMBER, 2002
INDICTMENT TO 31 DECEMBER, 2002 -
41 DAYS TOLLED;

(ii) 2003 - 365 DAYS
TOLLED, AND

(iii) 22 MARCH, 2004 START
OF TRIAL - 31 DAYS TOLLED.

AT THIS JUNCTURE, THE TOLL-
ING PERIOD SINCE THE CASE WAS INDICTED
ON 20 NOVEMBER, 2002 WHICH ACTIVATED THE
TOLLING PROVISIONS OF THE IAD CAME
TO 487 DAYS, EFFECTIVELY PUTTING
THE STATE IN THE ARREARS BY 307
DAYS AS TO THE BRIGHT-LINE DEAD-
LINE OF 180 DAYS; 15 DAYS CAN BE EQUI-
TABLY TOLLED FOR THE GOVERNMENT
AS TO THE RECEIPT OF THE IAD BY
THE PROSECUTING OFFICER AND THE
COURT - A DEFAULT OF 292 DAYS PUR-
SUANT TO THE IAD AND O.C.G.A. SEC.
42-6-20. SEE FEY V. MICHIGAN, 507 U.S.
43 (1993).

HERE, IN THE CASE AT BAR
A CONTINUANCE WAS GIVEN THE
PROSECUTOR AT THE 180 DAY MARK ON
19 MAY, 2003. IT'S A WELL-SETTLED
AXIOM OF LAW UNDER THE IAD THAT

A CONTINUANCE CAN BE GRANTED, IF REASONABLE AND NECESSARY WHICH WOULD EQUITABLY TOLL THE 180 DAY TRIAL MARK ON BEHALF OF THE STATE. SEE REAVES V. STATE, 242 GA. 542 (1978) AND PARROTT V. STATE, 206 GA. APP. 829 (1992), AND ART. III (2) IAD. BUT THE SAME TOKEN, IF THE RECORD DOESN'T REFLECT OR INDICATE SOME LEGITIMATE JUSTIFICATION FOR EQUITABLY TOLLING THE 180 DAY CLOCK, THEN THE INDICTMENT SHOULD BE DISMISSED WITH PREJUDICE AND A FAILURE TO DO SO BY THE COURT WOULD BE ERRONEOUS. SEE GENERALLY DUCHAC V. STATE, 151 GA. APP. 374 (1979). THE STATE RECORD ON THE ISSUE AT BAR SHOWS THAT A HEARING WAS HELD ON 19 MAY, 2003, AFTER THE 180 DAYS HAD TOLLED WHICH IS CITED IN PERTINENT PART AS FOLLOWS

(CH. T. 73-75),¹

THE COURT, "... I RENDER

¹ THE PETITIONER WILL CITE FROM THE HEARING TRANSCRIPT AS "H.T." FOLLOWED BY THE APPROPRIATE PAGE NUMBER.

BER AT ONE TIME, MR. HIGGINS, THERE WAS A FEDERAL DETAINER ISSUE AND NOTICE HAD BEEN GIVEN SEEKING DISPOSITION OF THIS CASE AND WE WERE DEALING WITH IT. I GUESS IT WAS THE 180-DAY TIME FRAME, BUT I DON'T KNOW WHETHER THAT'S NOT AN ISSUE OR WHETHER YOU'RE SATISFIED THAT JUST GRANTED TAKES CARE OF THAT.

MR. HIGGINS, "WELL, THE ONLY ISSUE WITH REGARD TO THAT IS THAT THE PROSECUTION OF MR. JONES IS NOT BARRED BUT THAT TIME FRAME AS LONG AS THE CONTINUANCE IS GRANTED FOR GOOD CAUSE... SO BASICALLY THE COURT WOULD NEED TO MAKE SOME FINDING WHETHER OR NOT THERE'S GOOD CAUSE SHOWN TO CONTINUE THIS AND IF SO WHAT DATE IN MY OPINION."

THE COURT, "OKAY. WELL I HAVE FOUND WITHOUT SAYING SO THERE HAS BEEN GOOD CAUSE SHOWN AND I DO AFFIRM SPECIFICALLY NOW THAT THAT GOOD CAUSE HAS BEEN SHOWN FOR A CONTINUANCE..."

MR. HIGGINS, "JUDGE, DOING IT ON THE RECORD, BUT I WILL

ALSO DRAFT AN ORDER OF CONTINUANCE FOR YOUR HONOR AS WELL JUST TO MAKE SURE IT'S REALLY CLEAR AND ON THE RECORD."

THE COURT, "... WHEN DOES THE 180 DAYS RUN?"

MR. HIGGINS, "THE 180 WAS ALREADY RUN."

THE COURT, "OH, IT'S ALREADY RUN?"

MR. HIGGINS, "BUT IT HAS NOT POSED A PROBLEM SINCE WE HAD A CONTINUANCE FOR GOOD CAUSE SHOWS PAST THAT TIME."

THE COURT, "NEEDS TO BE TO A CERTAIN TIME."

MR. HIGGINS, "-- JUNE 2ND WEEK, NEEDS TO ALSO BE DEMONSTRATED GOOD CAUSE SHOWN AS WELL."

THE COURT, "ALL RIGHT I'LL DO THAT, I AM FURTHER CONTINUING IT FOR GOOD CAUSE SHOWN..."

THE PETITIONER CONTENDS THAT THE ABOVE-STATED IS NOT ILLUSTRATIVE OF HOW THE MECHANICS OF THE IAD OPERATES, I.E., ALLOW THE 180 DAYS TO TOLL AS IT DID IN THE CASE AT

BAR AND SIMPLY ASK FOR A CONTINU-
ANCE WITHOUT GOOD CAUSE OR REASON,
TO WHICH THE COURT STATES THAT ~~IT~~ WAS
FOUND GOOD CAUSE TO CONTINUE THE
CASE WITHOUT SAYING SO; THE JUDGE
WASN'T EVEN AWARE OF THE FACT THAT
THE 180 DAYS HAD ALREADY RAN WHEN
HE MADE WHAT AMOUNTS TO A "BLIND
RULING". THE CASE AT BAR SHOWS NON-
EXISTENT DISCOVERY ISSUES, VACATION
CONCERNS BY THE PROSECUTOR AND AL-
LEGATIONS BY THE STATE THAT THE DE-
FENSE WAS WITHHOLDING DISCOVERY
WHICH AS THE RECORD CLEARLY SHOWS
DID NOT OCCUR, (SEE 19 MAY, 2003 HEAR-
ING TRANSCRIPT, H.T. 1-25). ARTICLE VII
OF THE IAD IS CLEAR IN THE LANGUAGE
AND MEANING AS TO AN EXTENSION OF
THE 180 DAYS, I.E., NECESSARY OR REA-
SONABLE ARE THE OPERATIVE WORDS AS
TO A CONTINUANCE WHICH IN THE CASE
SUB JUDICE WAS SOMETHING AKIN TO
AN EMPTY MEANING - HAD NO EFFECT
AS IT WERE.

THE IAD WAS DESIGNED
TO FACILITATE THE DISPOSITION OF PEN-
ING DETAINERS FROM ONE STATE TO
ANOTHER OR AS IN THIS CASE, FEDERAL

ALTO STATE, AND TO ELIMINATE UNWARRANTED PROSECUTORIAL DELAYS AS THE RIGHTS OF AN INDIVIDUAL PROCEEDING UNDER THE INTERSTATE AGREEMENT ON DETAINERS ARE PROTECTED BY THE SIXTH AND FOURTEENTH AMENDMENTS OF THE U.S. CONSTITUTION AND CORRESPONDING SECTIONS OF THE GEORGIA CONSTITUTION JUST AS A SPEEDY TRIAL WOULD BE. SEE KLOPFER V. N.C., 386 U.S. 213 (1967) AND SMITH V. HOOPER, 391 U.S. 391 AND 374 (1968). THE TRIAL COURT ORDER ON THE MOTION AT BAR IS COMPLETELY DEVOID OF ANY SUPPORT AS TO ITS DENIAL OF SAME. THE COURT STATED IN ITS ORDER AT 2, PAR. 1 AND P. 3, (THE 3 PAGE ORDER IS NOT PAGENATED), THAT, "DEFENDANT'S CONCLUSORY AND UNSUBSTANTIATED STATEMENT THAT THERE WAS SOMETHING UNWITTINGLY GOING ON BETWEEN THE COURT AND THE STATE RELATIVE TO THE CONTINUANCE IS NOT ENOUGH," WHICH IS WHOLLY CONTRARY TO THE HEARING TRANSCRIPT AS CITED HEREIN; AND STATE-MADE BY THE APPELLANT IN HIS MOTION IS BASED SOLELY ON THE DIALOGUE BETWEEN THE HEARING JUDGE AND

COUNSEL FOR THE STATE WHICH UPON A GENERAL READING IS NOT DIFFICULT TO INTERPRET AND/OR DECIPHER, I.E., "REASONABLE JURISTS" WOULD COME TO THE SAME GENERAL CONCLUSIONS AS THE PETITIONER.

HERE, THE GOVERNMENT SIMPLY DID NOT COMPLY WITH THE PROVISIONS OF THE IAD. IN FACT, THE COURT WASN'T EVEN AWARE OF THE FACT THAT THE 180 DAYS HAD ALREADY RAN WHEN THE STATE MOVED FOR A CONTINUANCE; THIS IS SUBSTANTIATED AS A RESULT, THE ENSUING CONVICTION AND SENTENCE WERE BROUGHT TO BEAR BASED ON A CLEAR VIOLATION OF THE PETITIONER'S SIXTH AND FOURTEENTH AMENDMENT RIGHTS PURSUANT TO THE IAD WHICH WOULD RENDER THE JUDGEMENT AND SENTENCE VOID AND WARRANT A DISMISSAL OF THE INDICTMENT. IN ADDITION, THE RECORD PLAINLY SHOWS THAT NOWHERE DID THE PETITIONER OR HIS ATTORNEY REQUEST A CONTINUANCE IN OPEN COURT OR OTHERWISE. SEE NEW YORK V. HILL U.S. 110 (2000).

FOR PURPOSES OF AN INQUIRY UNDER THE I.A.D TRIAL CLAUSE OF THE FEDERAL CONSTITUTION'S SIXTH AMENDMENT, OFFICIAL NEGLIGENCE IN BRINGING AN ACCUSED TO TRIAL OCCUPIES THE MIDDLE GROUND BETWEEN DILIGENT PROSECUTION AND BAD-FAITH DELAY, BUT IS NOT AN ACCEPTABLE REASON FOR DELAYING PETITIONER I.A.D ONCE THE PROSECUTION HAS BEGUN; BAD-FAITH DELAY OF EVIDENTIARY PREJUDICE WOULD MAKE RELIEF VIRTUALLY AUTOMATIC. IN ORDER TO WARRANT GRANTING RELIEF FOR NEGLIGENCE ACCOMPANIED BY PARTICULARIZED EVIDENTIARY AND TRIAL PREJUDICE LASTED LONGER THAN GUARANTEED CONSTITUTIONAL RIGHT OF THE SIXTH AMENDMENT. IN FACT THE U.S. COURT OF APPEALS FOR THE SIXTH CIRCUIT IN KLOPFER V. NORTH CAROLINA, 386 U.S. 213 (1967), IMPOSED THE RIGHT BY A VIOLATION OF DUE PROCESS CLAUSE OF THE FOURTEENTH AMENDMENT ON THE STATE SEE ALSO SMITH V. HOVEY, 393 U.S. 374 (1969).

THE DELAY BETWEEN PETITIONER FILING OF THE I.A.D AND TRIAL VIOLATED PETITIONER RIGHT TO 180 DAY TRIAL. HIS CLAIMS MEETS THE BARKER V. WINGO, 407 U.S. 514, 530, 33 L. ED. 2D 161, 42 S. C.T. 2182 (1972). FIRST, THE EXTRAORDINARY 545 DAYS LAG BETWEEN HIS DETAINERS AND TRIAL

CLEARLY SUFFICES TO TRIGGER THE INTERSTATE AGREEMENT ON DETAINERS INQUIRY. SECOND, THE GOVERNMENT WAS TO BLAME FOR THE DELAY. THE TRIAL ERRED IN DENYING PETITIONER MOTION TO DISMISS WITH PREJUDICE BECAUSE THE PETITIONER REQUESTED A DISMISSAL IN VIOLATION OF THE 180 DAY AGREEMENT ON DETAINERS HAD EXPIRED WHEN THE TRIAL COURT GRANTED IT'S CONTINUENCE WITHOUT A SHOWING OF GOOD CAUSE OR REASON SHOWN U.C.G.A. § 42-6-20 III (a) . . .

IN DOGGETT V. UNITED STATES 505 U.S. 647 (1992) THE EXTRAORDINARY LENGTH OF DELAY IS SUFFICIENT TO TRIGGER THE SPEEDY TRIAL INQUIRY, AND THE ACCUSED IS NOT TO BE TAXED FOR INVOKING HIS SPEEDY TRIAL RIGHTS. THE ACCUSED IS ENTITLED TO RELIEF. A CRIMINAL DEFENDANT MAY INVOKE DUE PROCESS UNDER THE FEDERAL CONSTITUTION TO CHALLENGE DELAY BOTH BEFORE AND AFTER OFFICIAL ACCUSATION.

IT IS MR. JONES PLEA TO THIS
HONORABLE SUPREME COURT OF THE UNITED
STATE TO RESPECTFULLY STEP IN AND REC-
TIFY THIS MISCARRIAGE OF JUSTICE THAT
HAS COST MR. JONES A GENERATION OF PRISON
TIME, DO TO MR. JONES NOT KNOWING THE
LAWS OF OFFICERS OF THE COURTS LEAVING
LOWER-INCOME INDIVIDUALS TO BE REPER-
SENTED BY STATE APPOINTED ATTORNEYS, THAT
PERFORMS INEFFECTIVELY, AND LEAVE INDI-
GENT PRISONERS LIKE MR. JONES THAT WAS
CONVICTED AT TRIAL AND LOST ON APPEAL BY
SAME STATE APPOINTED COUNSEL AND SENT-
ENCED TO GENERATIONS OF PRISON TIME, DO
TO LACK OF FUNDS AND KNOWLEDGE,
MR. JONES, ACCORDING TO HIS COUNSEL,
WAS SUPPOSE TO DEFEND FOR HIMSELF...

CONCLUSION

WHEREFORE, THE PETITIONER - PRAYS THAT THIS HONORABLE COURT GRANTS SAID PETITION.

RESPECTFULLY SUBMITTED,
THIS 22 DAY OF JANUARY, 2021
/s/ Frankie Jones
FRANKIE JONES
PETITIONER - PRO SE