No. _____

IN THE SUPREME COURT OF THE UNITED STATES

CLIFFORD WILLIAMS,
Petitioner,

v.

STATE OF LOUISIANA,
Respondent.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE SUPREME COURT FOR THE STATE OF LOUISIANA

PETITION FOR A WRIT OF CERTIORARI

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QUESTION PRESENTED FOR REVIEW

Clifford Williams was convicted of murder in New Orleans, Louisiana, after the trial court denied him the right to introduce evidence showing he was reasonable in acting in self-defense and that the victim was more likely to have been the aggressor. Petitioner sought to introduce evidence showing that the deceased had threatened Petitioner's life on social media, had threatened Petitioner's life in person at a grocery store prior to the shooting, had a prior juvenile adjudication for illegal firearm possession, and was on social media posing with firearms before the shooting, all in an attempt to support a claim of self-defense. The Louisiana Supreme Court agreed with Petitioner that the trial court erred in its refusal to admit this other evidence, but strangely then held that same evidence inadmissible for other reasons. The question presented is whether:

Review should be granted when a state court's arbitrary decision to deny a defendant the ability to present his self-defense case is so egregious that it amounts to a denial of the fundamental constitutional right to present a defense, as guaranteed by the Fifth, Sixth, and Fourteenth Amendments to the United States Constitution.

PARTIES TO THE PROCEEDINGS IN THE COURT WHOSE JUDGMENT IS SOUGHT TO BE REVIEWED

All parties 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:

Clifford Williams	Petitioner
State of Louisiana	Respondent

LIST OF RELATED PROCEEDINGS

1. *State of Louisiana v. Clifford Williams*, Orleans Criminal District Court, 516-674 "J", Date of conviction January 26, 2017, sentenced May 17, 2017.

2. *State of Louisiana v. Clifford Williams*, Louisiana Fourth Circuit Court of Appeal, 265 So.3d 902 (La. App. 4 Cir. 2/27/2019), conviction and sentence affirmed February 27, 2019.

3. *State of Louisiana v. Clifford Williams,* --- So.3d ----2020, WL 1671569 (La. 4/3/2020), Appellant writ denied April 3, 2020.

4. *State of Louisiana v. Clifford Williams* 298 So.3d 151 (Mem) (La. 7/9/2020), request for rehearing denied in relevant part July 9, 2020.

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases:

Constitutional Provisions

Statutes:

OPINIONS BELOW

The Louisiana Fourth Circuit Court of Appeals ruling on Petitioner's direct appeal in case number 2018-KA-0445 is reprinted in the Appendix to the Petition ("App.") at 1a-27a. The opinion of the Louisiana Supreme Court in case number 2019-K-0490 is reprinted in the Appendix to the Petition ("App.") at 28a-36a. Rehearing was denied in *State of Louisiana v. Clifford Williams*, 2019-K-0490, and reprinted in the Appendix to the Petition ("App.") at 37-38a.

STATEMENT OF JURISDICTION

Petitioner seeks review of a decision rendered by the Louisiana Supreme Court in a published opinion on April 3, 2020, and subsequent denial of rehearing on July 9, 2020 in which the Louisiana Supreme Court held that Petitioner's right to due process under the Fifth Amendment of the constitution was not violated when the state district court denied Petitioner his right to present a defense at trial. This Court has supervisory jurisdiction pursuant to 28 U.S.C. 1257.

CONSTITUTIONAL PROVISIONS INVOLVED

The Due Process Clause provides: "No person shall . . . be deprived of life, liberty, or property, without due process of law." U.S. Const. Amend. V.

"No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws." U.S. Const. Amend. VI.

The application of the Bill of Rights to state actions; "nor shall any State deprive any person of life, liberty, or property, without due process of law." U.S. Const. Amend. XIV.

STATEMENT OF THE CASE[1]

On July 18, 2013, Defendant/Petitioner Clifford Williams was indicted with one count of *Louisiana Revised Statute* 14:30.1, relative to Second-Degree Murder in the March 25, 2013 death of Ralphmon Green. This matter was allotted to Judge Darryl Derbigny in the Orleans Parish Criminal District Court, Section "J".

On October 2, 2015, Petitioner moved for the disclosure of an eyewitness' name whose existence had been made known to the defense on the eve of trial. The trial court eventually granted the defense motion and ordered production of the witness' name. The prosecution sought supervisory review, which was granted on October 20, 2015 in *State v. Williams*, 2015-K-1074 (La. App. 4 Cir. 10/20/2015). The appellate court sent the matter back to the district court for certain considerations relative to the witness' exculpatory value and safety considerations.

On January 27, 2016, the district court ordered once again that the identity of the witness be provided to the defense. The prosecution sought supervisory review, and after a court clarification on March 29, 2016, filed a second application in *State v. Williams*, 2016-K-0347 (La. App. 4 Cir. 5/20/2016). The appellate court denied that application.

On January 23, 2017, the district court granted a prosecution motion in limine to exclude the juvenile arrest history of the deceased despite Petitioner's intent to present a self-defense theory at trial. Jury selection began January 24, 2017. Several evidentiary issues arose during trial, many of which occurred during

[1] All assertions regarding the history and the facts of the instant case contained herein have record and transcript citations. However, for ease of use they are not included in this Petition, but will be provided upon any request from this Court.

un-transcribed bench conferences.

There was no question at trial that Mr. Williams shot and killed Green; multiple witnesses identified Petitioner, he was found in possession of the weapon used, his fingerprints were on the weapon, and Mr. Williams readily admitted his role. The state presented nine witnesses at trial, yet none of them could effectively contradict the self-defense claim, especially while admitting to lying or getting caught lying through prior statements or police officer testimony.

Carl "Monster" Moore, a friend of Green's, specifically stated at the beginning of his testimony that he could not tell the truth. He further stated during his testimony that he wanted Petitioner dead. While he then testified he was a witness to the events leading up to and including the shooting of Green, "Monster" gave multiple conflicting statements about what he had allegedly seen on March 25, 2013, claiming that Petitioner was the only person with a gun – but that testimony was in direct contradiction to his Grand Jury testimony where he testified that Green also had a firearm. While "Monster" at trial suggested that Petitioner intended to kill Green, "Monster" was shown to have previously stated that Mr. Williams did not want to kill Green.

Durell "Ruger" Williams, another friend of Green's, also admitted he could not tell the truth while testifying. "Ruger" was shown to have previously admitted that Green taunted Petitioner prior to the shooting, even though he denied this at trial. While "Ruger" testified at trial that Mr. Williams was the only person with a

gun, it was established that he had previously told an NOPD Detective that there had been three people with guns at the scene of the shooting.

Tina Williams, mother of Durell Williams, also claimed she was a witness, and that when she arrived on the scene she saw someone get out of a car and hand Petitioner's group a gun. After the shooting, Tina called 911, and her friend "Jalitha" Last Name Unknown ("LNU") exclaimed that Green was still breathing. Tina then went to Sheryl Green's house and told her the shooter's name was Cliff, a fact she only learned from Jalitha. On cross, Tina confirmed Durell and "Noony" (Dominique LNU) were present during the shooting.

NOPD Detective Travis Ward, lead detective on the case, confirmed that while there should have been surveillance footage of the shooting, by the time NOPD requested it, that footage had been overwritten. Ward also confessed that very few interviews were actually done at the scene of the shooting. Ward then admitted that the investigation revealed there in fact had been a long-standing dispute between Green and Mr. Williams, with Green evidencing antagonism toward Petitioner, despite Carl "Monster" Moore's claims otherwise. Ward also discussed a gang that called themselves "Money over Everything", which included Carl "Monster" Moore, Jermaine Williams, Durell "Ruger" Williams, and a female named Dominique LNU, again despite "Ruger"'s claims otherwise. Ward also testified that Durell Williams made the comment "he must have thought we were going to do him something", in reference to Clifford Williams.

Finally, it must be noted that while it was learned at trial that Mr. Williams fired his gun eight (8) times, the forensic testimony established that, of the eight (8) shots fired, only half actually hit Green. Of those four (4) shots that actually hit Green, only two (2) were fatal. Meaning that of eight (8) shots fired, only two (2) were on target. These facts support the position of the defense that Petitioner fired in self-defense while turning and running away from Green, shooting wildly in his general direction and missing his target far more often than hitting it. Moreover, the forensic testimony also established that law enforcement did not bag Green's hands, or in any way attempt to preserve any potential gunshot residue.

Defense witness Lamont Anderson then testified that he was present at the shooting, and that he was there when Green 'went off' on Petitioner, telling Petitioner he would kill him. He also witnessed Green being handed a firearm by Dominique "Noony" LNU, and holding the handle of that firearm during his verbal dispute with Petitioner. Anderson also stated that he heard from Jalitha that someone picked up Green's gun from the scene following the shooting. (NOPD Officer Juan Lopez, who initially responded to the scene of the shooting admitted that there had been a large crowd at the scene before he arrived, and that no one interviewed anyone in the crowd.) The defense also attempted to put on Torrey Lewis, a student at Southern who grew up with both Green and Mr. Williams. The defense began by asking about an incident at a grocery store, to which the state immediately objected. Following an unrecorded bench conference, defense counsel

ceased his questioning of Lewis.

In a chambers conference, the defense offered what would have been Defense Exhibit 3, an Instagram photo purporting to be Green brandishing firearms that defense counsel had been prevented from asking about during the trial. This photo was proffered under seal, following which the defense made a motion for mistrial. That motion was denied, but the court ultimately accepted the exhibit under seal. The defense clarified that this photograph was being offered in conjunction with the court's decision to prohibit it from introducing any evidence of Green's prior conviction for *Louisiana Revised Statute* 14:95, illegal carrying of weapons.

After three days of trial, Petitioner was found guilty as charged on January 26, 2017. On May 17, 2017, the district court denied Mr. Williams' motion for post-verdict judgment of acquittal and motion for new trial. Petitioner was sentenced to serve life without benefit of probation, parole, or suspension of sentence, and his Motion to Reconsider Sentence was subsequently denied by the district court. It is worth noting that this incident occurred 6 days after Mr. Williams' 18th birthday, making him ineligible for the possibility of parole on a life sentence by a mere 6 days.

Appeal was then filed to the Louisiana Fourth Circuit Court of Appeal on September 17, 2018, which, misstating facts of the case and ignoring actual testimony given at trial, affirmed Petitioner's conviction and sentence on February 27, 2019. *State of Louisiana v. Clifford Williams*, 265 So.3d 902 (La. App. 4 Cir.

2/27/2019), App. 1a-27a. A writ was then taken to the Louisiana Supreme Court, which disagreed with the Fourth Circuit, finding that Mr. Williams had in fact presented appreciable evidence of an overt act by Green, but then inexplicably denying relief based on another incorrect statement of the facts. *State of Louisiana v. Clifford Williams*, --- So.3d ----2020, WL 1671569 (La. 4/3/2020), App. 28a-36a. Because of that Court's misstatement of the facts in its denial, Petitioner then filed a request for rehearing, which was denied in relevant part July 9, 2020. *State of Louisiana v. Clifford Williams*, 298 So.3d 151 (Mem)(La. 7/9/2020), App. 37a-38a. This Petition for Certiorari follows.

REASONS FOR GRANTING THE PETITION

Few rights are more fundamental to due process in our criminal justice system than a defendant's right to present a defense. *Chambers v. Mississippi*, 410 U.S. 284, 302 (1973). And few states violate a defendant's right to due process more frequently than Louisiana. *See, e.g., Ramos v. Louisiana,* 140 S. Ct. 1390 (2020); *Montgomery v. Louisiana,* 136 S. Ct. 718 (2016), as revised (Jan. 27, 2016); *Smith v. Cain,* 565 U.S. 73 (2012); *Connick v. Thompson*, 563 U.S. 51 (2011); *Kennedy v. Louisiana,* 554 U.S. 407, as modified (Oct. 1, 2008), opinion modified on denial of reh'g, 554 U.S. 945 (2008); *Kyles v. Whitley,* 514 U.S. 419 (1995). Petitioner Clifford Williams, who asserted the privilege of self-defense at a trial in New Orleans, Louisiana, was denied this fundamental right when the Louisiana Supreme Court upheld the trial court's erroneous decision to prohibit him from presenting evidence

supporting that self-defense claim. This was a fundamental miscarriage of justice and a violation of due process.

Petitioner was convicted of Second-Degree Murder in the shooting death of Ralphmon Green. Petitioner had a meritorious claim of self-defense, however, and never denied that he shot Green, claiming self-defense immediately upon his arrest. Further, the prosecution's own witnesses, as well as defense witnesses, all provided testimony establishing that Green had threatened Petitioner both on the day of the shooting and previously. Witnesses also stated that Green had a firearm the time of the shooting.

While the testimony of prosecution witnesses at trial was intended to contradict Petitioner's self-defense argument, the state relied mainly on the testimony of three witnesses: Carl "Monster" Moore, Durell "Ruger" Williams, both of whom admitted at trial they would not tell the truth, and more tangentially, Tina Williams, Durell's mother. Additionally, Moore and Durell Williams testified in a manner that contradicted prior statements to the police or the grand jury, and testified in a manner that contradicted police testimony. Yet at trial, all three witnesses falsely testified that Green did not have a gun on his person at the time of the shooting. In contrast, Petitioner introduced the testimony of Lamont Anderson, who testified that Green had a firearm when he was shot, and had threatened Petitioner. Whether or not Green was in possession of a firearm, was the aggressor, and whether Petitioner was reasonable in his belief that he needed to defend

himself, then, were all unresolved questions of fact to be determined by the jury.

In light of Anderson's testimony, Petitioner sought to introduce evidence under *Louisiana Code of Evidence article* 404(A)(2)(a) showing both that Green had a firearm and was the aggressor, as well as that Petitioner was reasonable in his belief that he needed to defend himself. Specifically, Petitioner sought to introduce evidence that the deceased had been on social media posing with firearms, that Green had a previous adjudication for a firearm weapon offense, that Green had made threats on social media against Petitioner, and that an individual named Torrey Lewis witnessed Green threatening Petitioner on a previous occasion.

The trial court precluded the Defense from introducing all of this additional evidence on the grounds that the Defense had failed to prove that *La. C.Ev.* art. 404(A)(2)(a) applied. The Louisiana Supreme Court eventually ruled that *La. C.Ev.* 404(A)(2)(a) *did* in fact apply, but then inexplicably, and without basis in either federal or state law, found no error in the denial of Petitioner's right to present a defense. Petitioner was denied his Fifth, Sixth, and Fourteenth Amendment rights to due process and to present a defense.

1. Federal Law Mandates a Right to Present a Defense

Whether rooted directly in the Due Process Clause of the Fourteenth Amendment or in the Compulsory Process or Confrontation Clauses of the Sixth Amendment, the Constitution guarantees criminal defendants "a meaningful opportunity to present a complete defense." *Crane v. Kentucky*, 476 U.S. 683, 690

(1986) (quoting *California v. Trombetta,* 467 U.S. 479, 485 (1984)). "The right of an accused in a criminal trial to due process is, in essence, the right to a fair opportunity to defend against the State's accusations." *Chambers v. Mississippi*, 410 U.S. at 294; *see also Lisenba v. California*, 314 U.S. 219, 236 (1941). "A person's right to reasonable notice of a charge against him, *and an opportunity to be heard in his defense*—a right to his day in court—are basic in our system of jurisprudence; and these rights include, at a minimum, a right to examine the witnesses against him, to offer testimony, and to be represented by counsel." *In re Oliver*, 333 U.S. 257, 273 (1948) (footnote omitted, emphasis added).

In fact, this Court has specifically held that few rights are more fundamental than that of an accused to present witnesses in his own defense. *Taylor v. Illinois*, 484 U.S. 400, 408 (1988). As such, just as an accused has the right to confront the prosecution's witnesses for the purpose of challenging their testimony, he has the right to present his own witnesses to establish a defense. *Washington v. Texas*, 388 U.S. 14, 19 (1967). This Court has long held that "at a minimum … criminal defendants have the right to the government's assistance in compelling the attendance of favorable witnesses at trial and the right to put before a jury evidence that might influence the determination of guilt." *Pennsylvania v. Ritchie*, 480 U.S. 39, 56 (1987). The accused has a right to call witnesses whose testimony is "material and favorable to his defense." *United States v. Valenzuela-Bernal,* 458 U.S. 858, 867 (1982).

Balanced against the due process rights of the accused, this Court has also recognized that "'state and federal rulemakers have broad latitude under the Constitution to establish rules excluding evidence from criminal trials." *United States v. Scheffer*, 523 U.S. 303, 308 (1998). That said, this Court has affirmed that the right to present a defense is impermissibly abridged when state rulemakers promulgate evidence rules that "infring[e] upon a weighty interest of the accused" and are "'arbitrary' or 'disproportionate to the purposes they are designed to serve.'" *Id.; Holmes v. South Carolina*, 547 U.S. 319, 324–31 (2006). Moreover, in order to declare a denial of that due process right, a court must find that the absence of that fairness fatally infected the trial; the acts complained of must be of such quality as necessarily prevents a fair trial." *Lisenba v. California*, 314 U.S. at 236. Such was clearly the case in Mr. Williams' trial.

2. Louisiana Courts Misapplied Federal Law and Denied Petitioner His Due Process Right to Present a Complete Defense

The jurisprudentially recognized constitutional right to present a defense is encapsulated in the federal rules of evidence, which, in pertinent part, ensures that the character of a victim may be admitted by a defendant at trial. Specifically, *Federal Rule of Evidence article* 404 holds that:

> (B) subject to the limitations in Rule 412, a defendant may offer evidence of an alleged victim's pertinent trait, and if the evidence is admitted, the prosecutor may:
> (i) offer evidence to rebut it; and
> (ii) offer evidence of the defendant's same trait; and
> (C) in a homicide case, the prosecutor may offer evidence of the alleged victim's trait of peacefulness to rebut evidence that the victim was the first aggressor.

Louisiana's code of evidence protects the same due process right. *Louisiana Code of Evidence article* 404 sets forth in pertinent part:

> (a) Except as provided in Article 412, evidence of a pertinent trait of character, such as a moral quality, of the victim of the crime offered by an accused, or by the prosecution to rebut the character evidence; provided that in the absence of evidence of a hostile demonstration or an overt act on the part of the victim at the time of the offense charged, evidence of his dangerous character is not admissible.

The fact that Louisiana's Rule 404 tracks the Federal Rules of Evidence is no coincidence. As recognized by the Louisiana Supreme Court, this decision was made by Louisiana to facilitate a "movement towards a uniform national law of evidence" [. . .] "especially where the language of the Louisiana Code is identical or virtually identical with that used ... in the federal rules" . . ." *State v. Foret,* 628 So.2d 1116, 1122 (La. 1993). Not only is the right to present character evidence of a victim in a self-defense case, then, a fundamental due process right, it is specifically provided for by statute on both the federal and state level.

Petitioner acknowledges that Louisiana law, while adopting and mirroring federal law, goes a step further in requiring that a defendant first produce evidence that at the time of the incident, the victim made a hostile demonstration or committed an overt act against him of such character that would have created in the mind of a reasonable person the fear that he was in immediate danger of losing his life or suffering great bodily harm. And as recognized by this Court, the state of Louisiana was arguably entitled to add that additional evidentiary hurdle to an

accused. *Holmes v. South Carolina*, supra.

Petitioner is not challenging the propriety of this state evidentiary rule. In fact, the Louisiana Supreme Court found that Petitioner, Clifford Williams *did* establish the overt act element triggering his right to present his claim of self-defense and ability to introduce 404(A)(2)(a) evidence. The Louisiana Supreme specifically held that:

> Defendant contends that the court of appeal erred because testimony of an eyewitness (which is summarized below) constituted appreciable evidence of an overt act by the victim, and the district court overstepped its bounds in evaluating the credibility of this witness to find the evidence was not appreciable because the witness was not credible. We agree.

State of Louisiana v. Clifford Williams, --- So.3d ----2020, WL 1671569 (La. 4/3/2020), App. 30a. In so ruling, the Louisiana Supreme Court stated that the testimony of Lamont Anderson " . . . qualifies as appreciable within the meaning of the article as interpreted by the jurisprudence." App. 32a. The Louisiana Supreme Court even acknowledged "evidentiary rules must yield to the constitutional right to present a complete defense in some instances." App. 34a. Accordingly, that court agreed that Mr. Williams was legally able to introduce evidence of the decedent's bad acts to show 1) that Green was more likely to have been the aggressor and/or 2) that Petitioner was reasonable in his belief that he needed to use deadly force to defend himself.

The Louisiana Supreme Court, however, still precluded Petitioner from introducing the above-cited evidence in support of his claim of self-defense. The

Supreme Court's entire denial of Mr. Williams' supervisory writ appears to stem from the following sentence: "[T]his evidence should have been excluded because of defendant's failure to show personal knowledge of the victim's alleged threatening behavior (because he disclaimed ever knowing the victim)." App. 36a. And this reasoning is exactly the type of "arbitrary" ruling "disproportionate to the purposes they are designed to serve" that impermissibly infringed upon 'the weighty interests of the accused" in Petitioner's case. *United States v. Scheffer*, *supra*.

The "state rulemakers" in question, the Louisiana legislature, allowed for the introduction of 404 evidence after a hostile demonstration or overt act, and the Louisiana Supreme Court rightly found that Mr. Williams met that threshold. But the Louisiana Supreme Court then took it upon itself to then make up a new rule that "denying knowing" the victim obviated Petitioner's right to present a defense. This is the very definition of "arbitrary": it has no backing from state rule makers, it has no basis in actual fact[2], it severely infringed upon a defendant's "weighty interest" in demonstrating his legitimate claim of self-defense, and, most egregiously, it denied Mr. Williams his due process right to present and full and complete defense.

[2] Clifford Williams **never denied knowing Ralphmon Green**. In his initial statement to NOPD Detectives Ward and Pardo, Mr. Williams never stated that he did not know Green. What he stated was that he "wasn't there." Mr. Williams then later admitted that he was, in fact, at the scene of the shooting. But at no point did Mr. Williams ever deny knowing Green. In fact, police testimony at trial in this case independently established that Mr. Williams and Green knew each other prior to Green's death, with Detective Ward acknowledging at a motions hearing that the two had a long running dispute.

Moreover, whether or not Petitioner knew Green was immaterial to his right to present evidence in support of his claim of self-defense. Green's conviction for gun possession and social media posts would still have been admissible to show he was more likely to have been armed than not – an important issue considering Moore testified in front of the grand jury that Green had a gun, Williams gave a statement to the police that there were multiple guns at the scene of the shooting, both witnesses at trial then stated Green was not armed, and Lamont Anderson testified that Green was armed. And Green's social media post, wherein he threatened Petitioner, would still have been admissible to show that Green was more likely to have been the aggressor. Finally, the testimony of Torrey Lewis, who was called to specifically testify that Green had threatened Clifford Williams just days prior to the shooting in this case would also have been admissible to show that Green was more likely to have been the aggressor. Yet the Louisiana Supreme Court has offered no legal basis for denying Petitioner his constitutional right to present a defense. This Court has addressed cases where precluding an accused from introducing evidence were deemed arbitrary and hence unconstitutional.

A similar constitutional violation occurred in *Chambers v. Mississippi, supra*. In that case, a defendant accused of murder was precluded form introducing evidence that another individual who had been called to testify at trial had made self-incriminating statements about having committed the murder in question to three other persons. Finding that the state rule was arbitrary and unconstitutional,

this Court noted that Mississippi had not even attempted to "defend" or "explain [the] underlying rationale" of the "voucher rule," 410 U.S. at 297. This Court ultimately then held that "the exclusion of [the evidence of McDonald's out-of-court statements], coupled with the State's refusal to permit [the defendant] to cross-examine McDonald, denied him a trial in accord with traditional and fundamental standards of due process." *Id.* at 302.

This Court also made a similar ruling in *Crane v. Kentucky, supra*. In *Crane* the accused was prevented from introducing evidence showing the circumstances under which he allegedly confessed to a crime. Finding that Kentucky's ruling denying the defendant a right to present his defense was arbitrary and unconstitutional, this Court noted that neither the state Supreme Court nor the prosecution "advanced any rational justification for the wholesale exclusion of this body of potentially exculpatory evidence." 476 U.S. at 691.

Much like Mississippi in *Chambers* and Kentucky in *Crane*, the Louisiana Supreme Court failed to explain the underlying rationale justifying barring Petitioner from introducing evidence in support of his theory of self-defense.

CONCLUSION

In the instant case, the Louisiana Supreme Court cannot even rely on a statute promulgated by a state rulemaker as justification for its action – the Louisiana Code of Evidence expressly *allowed* Petitioner to introduce the evidence in question. Yet Petitioner was denied the right to present evidence in support of his

self-defense claim—that he had been threatened by Green not only the day of the shooting but before, which had been seen by an independent witness, that Green had been adjudicated for a crime involving firearms, and that Green had posted social media images showing him brandishing firearms. The ruling of the Louisiana Supreme Court was arbitrary under the guidelines and jurisprudence established by this Court and impermissibly curtailed Petitioner's constitutional right to present a defense, violating his due process rights. That ruling cannot stand, and Mr. Williams asks this Court for relief.

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