

No. **21-7249**

Supreme Court, U.S.
FILED

SEP 14 2021

OFFICE OF THE CLERK

IN THE
SUPREME COURT OF THE UNITED STATES

JACOB IVAN HZLL — PETITIONER
(Your Name)

vs.

UNITED STATES OF AMERICA — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

JACOB HZLL
(Your Name)

U.S.P. BIG SANDY, P.O. BOX 2068
(Address)

INEZ, KY 41224
(City, State, Zip Code)

N/A
(Phone Number)

ORIGINAL

QUESTION(S) PRESENTED

- (1)(A) Is A Trial Counsel's Failure To Inform His Client That He Faces A "MANDATORY" LIFE SENTENCE If He Chooses To Go To Trial & Lose, Not A Violation Of That Client's Sixth Amendment Right To Effective Assistance Of Counsel? ... & Does That Counsel's Failure Not Prejudice & Interfere With That Defendant's Ability To Competently Evaluate Whether Or Not He Should Consider The Government's Offered Plea Negotiation To Testify Against His Co-Defendant?
- (1)(B) Is It Not A Violation Of A Defendant's Constitutional Right Of Being "Presumed Innocent Until Proven Guilty", As Well As Their Right To "Present A Meaningful Defense" When That Defendant Is Barred "Before" Trial From His Chosen Truth & Defense Of "Self-Defense" Do To The Single Fact That "One" Of The Counts In His Indictment Is A Contested, & Yet Unproven "924(c)"? ... Can [U.S. v. Stoley, 19 F.3d at 153] lawfully be used To Weaponize A Yet Unproven 924(c) Violation To Ban Any Mention Or Use Of Self-Defense In A Defendant's Trial? Even When The Defendant Is Actively Contesting The 924(c) As Well As All Of It's Alleged Predicates?
- (2)(A) In The Case Of A Government's Key Witness [From Whom It's Adopted It's ENTIRE Theory & Case From] Is It Not Extremely Prejudice For A Residing Judge During Trial To Suggest Before The Jury That That Witness Did NOT Mean What He'd Just Said, & That He Instead Thought & Meant Something In Which He Sever Himself Said? Especially When That Witness Is The ONLY One Claiming That A Certain Series Of Events Ever Even Happened.
- (2)(B) Can Not Two Or More Errors Rise To The Level Of A Constitutional Violation Under The Cumulative Errors Doctrine? ... & Although Appeal Counsel Has Discretion As To What Issues They Raise, Is It Not A Violation Of A Defendant's Sixth Amendment Right To Effective Assistance Of Counsel When Counsel Wastes That Defendant's Direct Appeal By Ignoring Stronger Issues That, If Won, Could Bring Relief, & Instead Argues Three Out Of Four WEAKER Issues That Could Literally Bring NO Relief Even If The Courts Agreed With Them?
- (2)(C) Is Not Prosecutorial Misconduct In The Form Of A Prosecutor Misrepresenting The Facts, & Making Improper Prejudicial Statements, Uncorrected By Any Specific Instructions Or Correction From The Court During Closing Arguments, A Violation Of That Defendant's Constitutional & Due Process Rights Of A Fair & Impartial Trial?

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

- [UNITED STATES v. JACOB HILL] DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA, CHARLOTTE DIVISION: 3:15-cv-179-FDW-DCK2
JUDGEMENT ENTERED MARCH 30, 2017.
- [UNITED STATES v. JACOB HILL] U.S. COURT OF APPEALS FOR THE FOURTH CIRCUIT.
No. 17-4222 . JUDGEMENT ENTERED DECEMBER 3, 2018
- [JACOB IVAN HILL v. UNITED STATES] DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA, CHARLOTTE DIVISION: 3:20-cv-10-FDW [RECUJAI MOTION FILED, THEN DENIED ON JULY 1ST 2020] JUDGEMENT ENTERED DECEMBER 11TH 2020.
- [JACOB IVAN HILL v. UNITED STATES] U.S. COURT OF APPEALS FOR THE FOURTH CIRCUIT.
No. 20-7914 . DENIED MAY 25, 2021
- [JACOB IVAN HILL v. UNITED STATES] PETITION FOR REHEARING & REHEARING EN BANC
IN U.S. COURT OF APPEALS FOR THE FOURTH CIRCUIT (No. 20-7914) AUG 2, 2021.

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OTHER

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 A 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 C 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 _____ 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 _____ 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.

JURISDICTION

☒ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was MAY 25, 2021.

☐ 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: August 2, 2021, and a copy of the order denying rehearing appears at Appendix D.

☐ 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 timely petition for rehearing was thereafter denied 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. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

- HOBBS ACT ROBBERY (18 U.S.C. § 1951)
- KIDNAPPING (18 U.S.C. § 1201 (a)(1))
- CARJACKING (18 U.S.C. § 2119 (3))
- POSSESSION WITH INTENT TO DISTRIBUTE COCAINE (21 U.S.C. § 841 (a)(1))
- POSSESSION ~~OF~~ A FIREARM IN RELATION TO A CRIME OF VIOLENCE OR DRUG TRAFFICKING CRIME (18 U.S.C. § 924 (c))
- CAUSING DEATH IN THE COURSE OF POSSESSION OF A FIREARM IN RELATION TO A CRIME OF VIOLENCE OR DRUG TRAFFICKING CRIME (18 U.S.C. § 924 (j))
- POSSESSION OF A FIREARM BY A CONVICTED FELON (18 U.S.C. § 922 (g)(1))
[ALL UNDER SECTION 2, AIDING & ABETTING]
- KIDNAPPING CONSPIRACY (18 U.S.C. § 1201 (c))
- DRUG TRAFFICKING CONSPIRACY (21 U.S.C. § 846)

STATEMENT OF THE CASE

[SEE PAGE 9]

STATEMENT OF THE CASE

A.) THE INDICTMENT

ON JULY 23, 2015, A GRAND JURY SITTING IN THE WESTERN DISTRICT OF NORTH CAROLINA, CHARLOTTE, RETURNED AN INDICTMENT THAT CHARGED JACOB HILL [ALONG WITH CODEFENDANT, CARLOS BENSON] WITH VARIOUS OFFENSES ARISING FROM A NOVEMBER 12, 2014 SHOOTING BETWEEN CARLOS BENSON & DARRELL HAMES THAT LEFT HAMES DEAD, & BENSON CRITICALLY WOUNDED.

B.) THE TRIAL

THE TRIAL FOR HILL & BENSON BEGAN ON SEPT 8, 2016. THE GOVERNMENT INTRODUCED QUINTON PATTERSON AS THEIR KEY WITNESS; [FROM WHOM THEIR ENTIRE CASE & THEORY WAS BOTH ADOPTED FROM, AS WELL AS DEFENDANT ON, BEING THAT PATTERSON WAS THE SOLE PERSON CLAIMING THAT A KIDNAPPING, CARJACKING, ROBBERY, ETC CONSPIRACY WAS BEHIND THE SHOOTING.]

THE GOVERNMENT ALSO CALLED RHONDA MILLER [HAMES'S GIRL FRIEND] AS A WITNESS TO THE SHOOTING ITSELF.

THE DEFENDANT'S INTRODUCED CARLOS BENSON AS A WITNESS. [WHO ADMITTED TO SHOOTING & BEING SHOT BY HAMES; BUT WHO TESTIFIED TO A DIFFERENT SET OF EVENTS HAVING LED UP TO THE SHOOTING THAN WHAT PATTERSON ALLEGED HAPPENED.]

HILL DID NOT TESTIFY, BUT HIS COUNSEL DID POINT OUT ALL THE FLAWS, & CONTRADICTIONS IN PATTERSON'S OWN TESTIMONY, USING PHONE RECORDS, PREVIOUS STATEMENTS, CURRENT TESTIMONY, AS WELL AS THE GOVERNMENT'S OWN WITNESS RHONDA MILLER'S TESTIMONY AS PROOF AGAINST HIS ALLEGATIONS.

C.) THE VERDICT

BOTH HILL AS WELL AS BENSON WERE FOUND GUILTY OF (18 U.S.C. § 1951); (18 U.S.C. § 1201 (a)(1)); (18 U.S.C. § 2119 (3)); (21 U.S.C. § 841 (a)(1)); (18 U.S.C. § 924 (c)); (18 U.S.C. § 924 (j)); (18 U.S.C. § 922 (g)(1)), ALL UNDER SECTION 2 (AIDING & ABETTING). & ALSO (18 U.S.C. § 1201 (c)); (21 U.S.C. § 846).

D.) THE SENTENCING

THERE WERE OBJECTIONS MADE BY HILL'S COUNSEL TO THE P.S.R.; ARGUMENT IN FAVOR FOR A DOWNWARD DEPARTURE FOR MR. HILL DO TO HIM NOT BEING PRESENT AT THE TIME OF THE SHOOTING, HIM BEING DIAGNOSED WITH PTSD, AS WELL AS WHAT HIS COUNSEL ARGUED WAS AN INCONSISTENT VERDICT. HILL'S COUNSEL ALSO BROUGHT UP MOTIONS FOR A NEW TRIAL, & ARGUED AGAINST THE S.O.S.O.G. § 2A1.1 CROSS-REFERENCE THAT WERE BEING APPLIED ON TOP OF EVERYTHING ELSE. BUT IN THE END, THE COURT, SAYING THAT IT HAD NO CHOICE, SENTENCED MR. HILL TO 240 MONTHS EACH ON COUNTS ONE, FIVE & SIX; A TERM OF LIFE IMPRISONMENT ON COUNTS TWO, THREE, FOUR, EIGHT & TEN. ALL TERMS TO RUN CONCURRENTLY, WITH AN ADDITIONAL 84 MONTHS ON COUNT SEVEN, TO BE SERVED CONSECUTIVELY TO ALL OTHER COUNTS [JA 2038]. THE COURT ENTERED IT'S JUDGEMENT ON MARCH 30, 2017, & HILL FILED HIS NOTICE OF APPEAL THE SAME DAY. [JA 2056-62, 2065-67].

REASONS FOR GRANTING THE PETITION

(ATTACHED ON FOLLOWING PAGE)

REASONS FOR GRANTING THE PETITION

NOT ONLY DO I BELIEVE THAT THE LOWER COURT'S DECISIONS [RULINGS] ARE IN CLEAR CONFLICT WITH WHAT THE RECORD ITSELF FACTUALLY SHOWS TO BE THE CASE, BUT THEY'RE ALSO IN CLEAR CONFLICT WITH PRE-EXISTING LAWS THAT WERE ESTABLISHED TO MAINTAIN THE COURT'S PUBLIC REPUTATION, ABILITY TO FUNCTION PROPERLY, AS WELL AS MAINTAIN EVERY DEFENDANT'S CONSTITUTIONAL & DUE PROCESS GUARANTEED RIGHT OF A FAIR & IMPARTIAL TRIAL.

... STARTING WITH MY "GROUNDS (1)(B) ISSUE"; ALL DEFENDANTS HAVE A CONSTITUTIONAL RIGHT TO BE 'PRESUMED INNOCENT UNTIL PROVEN GUILTY', AS WELL AS TO PRESENT A 'MEANINGFUL DEFENSE'. BUT HOW ARE THOSE GUARANTEED RIGHTS NOT BEING CONSTANTLY VIOLATED WHEN THE FOURTH CIRCUIT IS USING "UNITED STATES V. SIOLEY" [SIOLEY, 19 F.3d at 153] AS A WAY [IN A WAY] THAT DENIES DEFENDANTS IN MY CIRCUIT BOTH OF THESE CONSTITUTIONAL RIGHTS?

... IN MY CASE, MY CO-DEFENDANT WAS INVOLVED IN A SHOOTING WITH ANOTHER GUY [I WASN'T PRESENT]. THEY BOTH WERE SHOT MULTIPLE TIMES BY ONE ANOTHER; BUT AS WHERE MY CO-DEFENDANT SURVIVED HIS INJURIES, THE OTHER GUY UNFORTUNATELY DID NOT. MY CO-DEFENDANT, WHO BY ALL ACCOUNTS WAS SHOT FIRST, CLAIMED THAT THE SHOOTING WAS IN SELF-DEFENSE, & WAS THE RESULT OF AN OLD 'BEEF' THAT HE & THE DECEASED CARRIED OVER A FEMALE [RATHER THAN THE VERSION OF EVENTS THAT PATTERSON ALONE ALLEGED, & IN WHICH THE GOVERNMENT CHOSE TO ADOPT & BASE IT'S CASE FROM.]. WHICH WAS THE WHOLE POINT & PURPOSE OF US GOING TO TRIAL. TO PROVE THAT IT WAS SELF-DEFENSE RATHER THAN THE CRAZY STORY THAT THE GOVERNMENT'S SINGLE WITNESS MADE UP IN ORDER TO SAVE HIMSELF.

& YET, DO TO THE FACT THAT 'ONE' OF THE 'NINE' COUNTS IN WHICH WE WERE BEING CHARGED WITH IN OUR INDICTMENT WAS A 924CC, WE WERE BANNED FROM ARGUING OR EVEN MENTIONING SELF-DEFENSE IN MY TRIAL. IT WAS RULED AN "IRRELEVANT DEFENSE" BEFORE ANY EVIDENCE WAS EVEN PRESENTED IN MY TRIAL, & SIMPLY BECAUSE OF THE MERE PRESENCE OF A YET

(2)(A) ISSUE RAISED FOR FURTHER DETAILS] THE JUDGE IN MY CASE ALSO VOICED HIS PERSONAL OPINION THAT HE BELIEVED & 'KNEW' THAT WE WERE GUILTY OF OUR CHARGES EVEN BEFORE ALL THE EVIDENCE HAD BEEN PRESENTED FROM BOTH SIDES [SEE, SEPT 14, 2016 TRIAL TRANSCRIPTS, PAGE 244, ... & SEPT 19, 2016 TRIAL TRANSCRIPTS, PAGE 138]. HE ALSO VOICED HIS OPINION THAT HE BELIEVED THAT DO TO THE SIMPLE FACT THAT ME & MY CO-DEFENDANT ARE 'FELONS' [& I WAS ON PAPERS] THAT WE 'COULDN'T' HAVE AN ORDINARY RELATIONSHIP, & THEREFORE 'HAD' TO HAVE GOTTEN TOGETHER THAT DAY TO COMMIT A 'KIDNAPPING', 'GROOMING', ETC CONSPIRACY. [SEE, SEPT 19, 2016 TRIAL TRANSCRIPT PAGE 148]. AN OPINION IN WHICH THE PROSECUTOR HIMSELF THEN ADOPTED & CHOSE TO USE IN HIS CLOSING ARGUMENT. EVEN DEFENSE COUNSEL VOICED ON RECORD THEIR CONCERN & BELIEF THAT THE COURT IN MY TRIAL FAILED IN IT'S DUTY TO BE IMPARTIAL. [SEPT 14, 2016 TRIAL TRANSCRIPTS, PAGE 244-245.]

... MY COUNSEL MADE MULTIPLE MOTIONS FOR A MISTRIAL DO TO INADMITTED EVIDENCE BEING SHOWN TO THE JURY, BUT BOTH WERE DENIED. EVEN THOUGH THE SECOND MOTION WAS DENIED UNDER FALSE PRETENSE, WHICH WAS CAPTURED CLEARLY IN THE RECORD ITSELF. [SEE MY GROUNDS (2)(A) ISSUE RAISED ON THE SUBJECT]

... IN TRIAL, JUDGES ARE CONSIDERED REFEREES OF A SORT. & WHEN YOU HAVE A JUDGE THAT CONSCIOUSLY MAKES RULINGS THAT UNNECESSARILY, YET EFFECTIVELY, TILTS THE 'SCALE' AGAINST ONE SIDE IN ORDER TO FAVOR THE OTHER, NO OBJECTIVE EVALUATOR OF FACTS CAN DENY THE VIOLATION OF THAT DEFENDANT'S CONSTITUTIONAL GUARANTEE OF A FAIR & IMPARTIAL TRIAL. FOR A COURT'S BIAS HAS ALREADY FACTUALLY BEEN RECOGNIZED AS UNJUST & HAVING NO PLACE WITHIN THE COURT'S PROCESS.

... & YET OBVIOUSLY MORE SPECIFIC EXAMPLES OF WHAT BIAS ACTUALLY 'LOOKS' LIKE ARE STILL NEEDED IN ORDER TO MAKE IT TRULY OFF LIMITS FOR THOSE WHO FAIL IN THEIR DUTIES TO ENFORCE THE COURT'S PROPER FUNCTIONING BY RESTING FAIRLY & IMPARTIALLY. A FAILURE IN WHICH ONLY THOSE WHO BETRAY ANY FAITH IN THE COURT'S PROCESS ARE LEFT TO PAY THE PRICE FOR. ... & TO MAKE EVEN CLEARER THE NEED FOR THIS COURT'S HONORABLE INTERVENTION [SEE MY GROUNDS (1)(A) ISSUES], DURING MY SENTENCING, AFTER LOSING TRIAL, MY COUNSEL ARGUED WITH THE COURT ABOUT ME DESERVING A DOWNWARD DEPARTURE; & WHEN THE COURT BRINGS UP THE FACT THAT I'M FACING A 'MANDATORY' LIFE SENTENCE, MY COUNSEL ARGUED THAT I'M NOT. THAT I'M ONLY FACING A 'TERM' OF YEARS 'UP' TO LIFE OR DEATH, THAT HE SAW NOR READ NOTHING ABOUT MY COUNTS CARRYING A 'MANDATORY' LIFE SENTENCE, ETC. BUT

(4 - OF - 6)

THEN, AFTER BEING GIVEN A CHANCE TO LOOK THE PENALTY IF CONVICTED UP FOR HIMSELF, MY COUNSEL THEN TRYS TO SAVE FACE FOR HIS OBVIOUS IGNORANCE IN THE MATTER BY BLATANTLY LYING TO THE COURT SAYING THAT HE'D "ALWAYS" ADVISED ME THAT I FACED A "MANDATORY LIFE SENTENCE." [ALL OF WHICH WAS & IS CAPTURED IN THE RECORD] - BUT - INSTEAD OF DEALING WITH THE OBVIOUS FAILURE OF MY COUNSEL ALLOWING ME TO GO TO TRIAL WITHOUT NOTIFYING ME OF WHAT I FACED IF I LOST, THE JUDGE JUST BASICALLY 'SWEEPED IT UNDER THE RUG'; SAYING IN MY APPEAL THAT MY COUNSEL 'SAID' THAT HE'D ALWAYS ADVISED ME THAT I FACED A MANDATORY LIFE SENTENCE. [AS IF HE WASN'T THERE HIMSELF & HADN'T ARGUED WITH MY COUNSEL ABOUT IT. & AS IF MY COUNSEL'S IGNORANCE WASN'T & ISN'T CAPTURED IN THE SENTENCING TRANSCRIPTS THEMSELVES.]

... IN MY GROUND (2)(B) ISSUE, I RAISE THE CUMULATIVE ERRORS DOCTRINE, WHICH WAS RECOGNIZED BY THE AUTHORITY OF THIS VERY COURT, & YET IT WAS SHRUGGED OFF & SIDE-STEPPED BY THE DISTRICT COURT'S OPINION THAT THERE WERE NO ERRORS OF ANY KIND IN MY CASE TO SPEAK OF. [EVEN THOUGH, AGAIN, THE RECORD FACTUALLY SAYS OTHERWISE - NOT TO MENTION AN ILLEGAL LIFE SENTENCE FOR A 922(c)]. NOR THE FACT THAT THE DISTRICT COURT THAT RULED OVER MY 2255 WAS THE VERY SAME JUDGE WHOM I NAMED SPECIFICALLY IN MULTIPLE ISSUES RAISED. THE SAME JUDGE WHOM MY TRIAL COUNSEL ACCUSED IN TRIAL FOR FAILING TO BE IMPARTIAL, ... THE SAME JUDGE WHO REFUSED TO RECUSE HIMSELF FROM PRESIDING OVER MY 2255, ...

... & IN CLOSING, I DON'T BELIEVE THAT THE 'SYSTEM' IS CORRUPTED, BUT I DO BELIEVE THAT THERE IS A SERIOUS SEED OF SPECIFIC BIASING FROM THE HIGHER COURT IN ORDER TO HELP DETER SOME LOWER COURTS FROM CONTINUING ON IN A LOT OF UNJUST OR QUESTIONABLE BEHAVIORS DURING TRIALS. & I KNOW THAT IT'S NOT ALL COURTS, BUT EVEN 'A' COURT IS WORTH THIS COURT'S ATTENTION & EFFORT WHEN ANY COURT BECOMES SO COMFORTABLE IN IT'S BIAS AS TO CREATE A NEW NORM IN IT'S DAY TO DAY FUNCTIONING. & SO MUCH SO THAT THE APPEALS COURTS ARE SOMEHOW FAILING OR NEGLECTING TO CORRECT IT EVEN WHEN IT'S AS APPARENT IN THE RECORD AS MINE

ARE. FOR NO MATTER HOW WELL INTENDED THE LAW & THE COURT'S PROCESS MAY BE, IF THE LOWER COURTS & THE ATTORNEYS WHOM OPERATE WITHIN THEM AREN'T HELD ACCOUNTABLE FOR FAILING TO ABIDE BY THE LAWS & RULES ALREADY PUT IN PLACE TO MAINTAIN JUSTICE'S PROPER FUNCTIONING, THEN JUSTICE ITSELF WILL INQUESTIONABLY SOON PART. WHICH CAN NEVER BE ALLOWED TO HAPPEN, FOR JUSTICE IS & ALWAYS HAS TO BE THE CORNERSTONE OF THE COURT'S PROCESS.

- THANK YOU FOR YOUR TIME -

Great Hall

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

 _____

Date: 11-23-21