No. _____

In The Supreme Court of the United States

David Laurence Hodges, Petitioner

v.

William Bolin, Warden Moose Lake Correctional Facility, Minnesota, Respondent.

On Petition For Writ of Certiorari To The Eighth Circuit Court of Appeals

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PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1. In deciding whether to issue a certificate of appealability under 28 U.S.C. § 2253, may a federal court find that "reasonable jurists would not disagree" about the denial of relief where other courts have resolved these issues, on similar facts, in a manner favorable to habeas petitioner's position?

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The Eighth Circuit Judgment in *Hodges v. Bolin*, No. 22-1758, denying the request for a certificate of appealability (Appendix A) is unreported. The Order of the United States District Court, *Hodges v. Bolin*, 21-CV-00165 (MJD/ECW) (D.Minn. March 9, 2022), appears at Appendix B. The Report and Recommendation of the Magistrate Judge appears at Appendix C. Mr. Hodges's petition for panel rehearing was denied by an Order dated June 10, 2022. This Order appears at Appendix D. Mr. Hodges had an appeal to the Minnesota Court of Appeals, *Hodges v. State*, A19-2003 (Minn.App. Aug. 24. 2020). This opinion appears at Appendix E. Mr. Hodges petitioned the Minnesota Supreme Court for review. This was denied by an Order dated September 28, 2020, which appears at Appendix F.

JURISDICTIONAL STATEMENT

The order sought to be reviewed was entered on June 10, 2022. (Appendix D). Petitioner invokes this Court's jurisdiction on the basis of 28 U.S.C. § 1254(1).

CONSTITUTIONAL PROVISIONS AND STATUTES INVOLVED IN THE CASE

The questions presented implicate the following provisions of the United States Constitution:

AMEND. XIV, No state shall … deprive any person of life, liberty, or property without due process of law.

AMEND. V, No person shall be … deprived of life, liberty, or property without the due process of law.

AMEND. VI, In all criminal prosecutions, the accused shall enjoy the right to have the assistance of counsel for his defense.

The questions further implicate the following statutory provisions:

28 U.S.C. § 2253(c), which states:

> (1) Unless a circuit justice or judge issues a certificate of appealability, an appeal may not be taken to the court of appeals from— (A) the final order in a habeas corpus proceeding in which the detention complained of arises out of process issued by a State court; or
>
> (B) the final order in a proceeding under section 2255.

(2) A certificate of appealability may issue under paragraph (1) only if the applicant has made a substantial showing of the denial of a constitutional right.

(3) The certificate of appealability under paragraph (1) shall indicate which specific issue or issues satisfy the showing required by paragraph (2).

28 U.S.C. § 2254, which is reproduced verbatim in the appendix to this section. (Appendix G).

STATEMENT OF THE CASE

During proceedings before the state district court, Mr. Hodges negotiated a plea agreement based on a mutual mistake of fact regarding his criminal history score. Then, just moments before he was sentenced, Mr. Hodges was made aware of the mutual mistake, but was never informed what impact that mutual mistake had on his negotiated plea or his constitutional rights. As a result of the mutual mistake of fact regarding Mr. Hodges' criminal history score, the plea he negotiated went from a bottom half of the box sentence for five points to a top of the box sentence for four points. Since that time, recent rulings in cases such as *State v. Provost*, 901 N.W.2d 199 (Minn.App. 2017); *Molina-Martinez v. United States*, _U.S. _,136 S.Ct. 1338 (2016), and *Rosales-Mireles v. United States*, 138 S.Ct. 1897, 1903 (2018), indicate that Mr. Hodges should be granted relief in the form of resentencing based on the plea agreement he negotiated under the mutual mistake of fact regarding his criminal history score.

On February 3, 2009, a woman reported to authorities that she had been sexually assaulted in Ramsey County (Complaint). On August 6, 2010, Mr. Hodges was charged in Ramsey County District Court with first-degree criminal sexual conduct, in violation of Minn. Stat. § 609.342, Subd. 1(e)(i). As a result of the Ramsey County investigation, Mr. Hodges was also charged, on October 5, 2010, in a separate complaint in Hennepin County, with a first-degree criminal sexual conduct and aggravated robbery charge related to events that allegedly occurred in Hennepin County in 2007. On November 17, 2010, the court ordered a competency evaluation for Mr. Hodges. On January 3, 2011, the court found Mr. Hodges competent to proceed.

On April 25, 2011, Mr. Hodges entered a guilty plea to first-degree criminal sexual conduct in his case. The plea agreement stated on the record was a settlement of both the Ramsey County and Hennepin County charges. The agreement called for Mr. Hodges to plead guilty to both first-degree criminal sexual conduct counts, with the Hennepin County charge to be sentenced first. (P. 2)[1]. The agreement also called for the Ramsey County court to confirm that Mr. Hodges had officially pled guilty in Hennepin County before accepting his plea. (P. 2-3). The parties presumed that sentencing would be argued within a range of 260-306 months, which was what they believed was the Guideline range for this offense presuming concurrent sentencing and a criminal history score of five. (S. 3)[2] Mr. Hodges' attorney specifically informed Mr. Hodges that a range of 260-306 months

[1] P. Refers to the transcript of the May 6, 2011 Plea hearing.
[2] S. Refers to the transcript of the August 3, 2011 Sentencing hearing.

was the appropriate guidelines sentence. (Hodges Affidavit). The prosecution agreed to recommend a 306-month sentence, which is the guideline sentence for a criminal history score of five. The agreement also called for a minimum sentence in the Ramsey County case of 260 months, or the Hennepin County deal would be invalidated. (P. 3). 260 months and 306 represented the bottom of the box to the presumptive sentence for a criminal history score of 5, meaning Mr. Hodges had effectively negotiated for a bottom half of the box sentence for his criminal history score.

When asked, Mr. Hodges indicated that he had gone over a plea petition with his attorney. (P. 6). Before going over his rights on the record, Mr. Hodges confirmed he had previously been treated for mental illness. (P. 7). He indicated that this included seeing either a psychologist or psychiatrist. (P. 7). He indicated that he was currently taking medications to deal with anxiety and depression. (P. 7). Although those medications did not prevent him from understanding what was going on or making decisions about what he wished to do, he was never asked if he was experiencing any mental illness symptoms, or if any mental illness symptoms affected his ability to make decision on that day. (P. 7). Later, after asking if he was under the influence of alcohol or any other substances, the prosecution asked generally if he was "thinking clearly." (P. 14-15). The court found there was a knowing and voluntary waiver of Mr. Hodges' rights. (P. 23).

On May 6, 2011, Mr. Hodges pleaded guilty to the Hennepin County charge. He was sentenced to 156 months on that case on June 13, 2011.

On August 3, 2011, Mr. Hodges appeared for sentencing. After the PSI was completed, it was clear that he only had four (4) criminal history points, not five (5). Therefore, the appropriate sentencing range was 199-281 months. The presumptive sentence was 234 months – 46 months less than the minimum sentence contemplated in the plea agreement based on a criminal history score of five (5).

At the sentencing hearing, the prosecution requested a top of the box sentence based on two (2) factors: (1) the victim's injuries were extensive; and (2) Mr. Hodges' continued denial of the offense. (S 3-4). To support the second rationale, the prosecution referred to Mr. Hodges' statements in the PSI. (S. 4). But to support the first rationale, the prosecution showed photographs of the victim's injuries to the Court, but deliberately did not place them in the court file, stating she did not want them in the court file. (S. 4). The Court accepted Mr. Hodges' plea and sentenced him to what was thought to be the top of the box: 281 months. (S. 7). In doing so, the court justified the sentence by saying it did not need to be justified, but that a jury would have found some aggravating factors. (S. 7). On March 27, 2012, Mr. Hodges' sentence was amended to 280 months, which is the actual top of the box; not 281.

Nothing was ever done, by anyone, to ensure Mr. Hodges was aware of what having only four (4) criminal history points meant in relation to his sentencing range or to determine how he wanted to proceed after that it had been discovered he had only four (4) points instead of the five (5) points that his negotiated sentence had been based on.

On August 5, 2013, Mr. Hodges' filed a petition for postconviction relief in Ramsey County. In the petition, he made three (3) claims: (1) he should be able to withdraw his guilty plea because he was not mentally sound at the time of his plea; (2) his plea was not intelligent because he was misinformed of the risks he faced by proceeding to trial; and (3) his sentence should be reduced because it was based on the court's review of the non-record photographs of the victim.

Along with his petition, Mr. Hodges filed an affidavit describing his significant mental health problems at the time of the plea hearing, including hearing voices and having hallucinations. The affidavit also stated that after being treated for mental illness in prison, he now understands his situation and knows that he would not have pled guilty had he been mentally sound. The affidavit also states that his trial attorney misinformed him of the correct sentencing range and that he would not have pled guilty under the plea offer had he been correctly informed of his correct sentencing range. The Court denied the petition in its entirety by an Order dated October 30, 2013.

By an unpublished opinion dated July 21, 2014, the Court of Appeals affirmed that denial. It held that Mr. Hodges had not shown a manifest injustice that would allow him to withdraw his plea because the sentence he received was in the range for his correct criminal history score. *Hodges v. State*, A13-2207, P. 9 (Minn.App. July 21, 2014). It also held that Mr. Hodges' due process rights were not violated due to lack of his competency because there was a competency evaluation that found him competent and he had not challenged those findings. *Id.*

P. 10. Finally, the Court of Appeals held that even if it was error for the prosecution to offer and the district court to review photographs not contained in the court file, the error was harmless because Mr. Hodges received a sentence within the appropriate range and therefore no justification for the sentence was required. *Id.* P. 11. The Minnesota Supreme Court denied review by on Order dated September 24, 2014.

Since then, Mr. Hodges has made several additional challenges to his plea and sentence. This included an April 13, 2015 Motion to modify sentence, with a hearing on December 31, 2015. The Court denied that petition the same day. Mr. Hodges initiated an appeal, but ultimately withdrew it. Then, on April 13, 2016, Mr. Hodges filed a Petition for Postconviction relief arguing he was denied procedural due process when the district court failed to allow him to either affirm or withdraw guilty plea when the criminal history score was wrong. On May 2, 2016, this Court issued an Order denying that petition, holding that the procedural history Mr. Hodges cited was not accurate and the standard of law Mr. Hodges argued applied did not actually apply.

Then, on May 20, 2016, Mr. Hodges filed an additional Petition for Postconviction relief seeking to withdraw his plea based on inaccurate criminal history score. In that petition, Mr. Hodges argued that time bar applied to his case was unconstitutional. That Petition was denied on July 15, 2016 for lack of service. On August 5, 2016, Mr. Hodges filed a motion to reconsider. This was denied on August 25, 2016, in an Order that also stated the Court would not accept any

further motions or petitions to resentence based on sentence being illegal or unauthorized by law or outside the plea agreement.

On August 20, 2019, Mr. Hodges filed a motion seeking to correct his sentence, or, in the alternative, that he be allowed to withdraw his guilty plea. This motion was denied by an order dated October 17, 2019.

REASONS FOR GRANTING THIS PETITION

I. The Eighth Circuit applied a heightened standard in denying a COA on Mr. Hodges' claims.

Mr. Hodges was required to secure a certificate of appealability as a prerequisite to his appeal of the District Court's dismissal of his habeas petition. See 28 U.S.C. § 2253(c)(1)(B). Under AEDPA, an application for a COA must demonstrate "a substantial showing of the denial of a constitutional right." Id. at (b)(2). A COA must issue if either: (1) "jurists of reason could disagree with the district court's resolution of his constitutional claims" or (2) "that jurists could conclude the issues presented are adequate to deserve encouragement to proceed further." Id. Where the petition has been denied for some procedural issue and the district court did not reach the merits in the petition, the COA should issue if the petitioner shows a valid claim of denial of constitutional rights and that jurists of reason would find it debatable whether the district court was correct in its procedural decision. *Slack v. McDaniel*, 529 U.S. 473, 484-85 (2000). A petitioner need not show "that the appeal will succeed." *Miller-El v. Cockrell*, 537 U.S. 322, 337 (2003). This Court has stated that, "a claim can be debatable even though every jurist of reason might agree, after

the COA has been granted and the case has received full consideration, that petitioner will not prevail." *Id.* at 338.

After review of Mr. Hodges's claims, the Eighth Circuit concluded that no reasonable jurists would disagree with the district court's denial of Mr. Hodges's petition despite the existence of very similar cases in which relief was granted by other reasonable jurists.

A. Cases with facts similar to Mr. Hodges's show a defendant in his situation must be resentenced using the correct criminal history score.

In this case, there was no disagreement that Mr. Hodges' criminal history score is actually four (4). There is also no dispute that everyone involved thought it was five (5) when he negotiated his plea deal. There is also no dispute that the sentencing range contemplated in Mr. Hodges's plea agreement corresponded with a criminal history score of five (5), with the minimum sentence he could receive being the bottom of the box and the highest sentence he could receive, which Mr. Hodges negotiated, being the presumptive sentence for 5 points. There is also no dispute that, despite negotiating a bottom half the box plea deal and entering his plea while all parties were under the mistaken belief that his criminal history score was five (5), the record shows literally nothing was done prior to Mr. Hodges receiving his sentence to determine what Mr. Hodges knew about this change in criminal history points, or how it impacted his feeling and understanding of his plea agreement when the error was discovered. There is not a single thing in the record to indicate that Mr. Hodges was made aware that instead of the bottom half the box for his

criminal history score he negotiated, he was now looking at, at best, a top 2/3 of the box sentence for his criminal history score.

Recently, the United States Supreme Court addressed this very issue in the context of the federal sentencing guidelines. *Molina-Martinez v. United States*, _U.S. _,136 S.Ct. 1338 (2016). In *Molina-Martinez*, the district court applied a higher sentencing range than applicable based on an incorrect criminal history. *Id.* at 1341. On appeal, the Court of Appeals for the Fifth Circuit refused to correct the error because the correct sentencing range overlapped with the incorrect higher range and the defendant "could not establish a reasonable probability that but for the error he would have received a different sentence." *Id.* The Supreme Court reversed and remanded declaring that a district court commits "significant procedural error" when it improperly calculates a defendant's guidelines range. *Id.* at 1346. It further recognized that although a sentencing court has wide discretion to vary above or below the guidelines range, the degree to which the court varies depends on the initial guideline calculation, and in this way, "the Guidelines are in a real sense the basis for the sentence." *Id.* at 1345 (quoting *Peugh v. United States*, 133 S.Ct. 2072, 2083 (2013) (emphasis in original)). Finally, the Court concluded:

> In the ordinary case the Guidelines accomplish their purpose. They serve as the starting point for the district court's decision and anchor the court's discretion in selecting an appropriate sentence. It follows, then, that in most cases the Guidelines range will affect the sentence. When that is so, a defendant sentenced under an incorrect Guidelines range should be able to rely on that fact to show a reasonable probability that the district court would have imposed a different sentence under the correct range.

Molina-Martinez, 136 S.Ct. at 1349.

The Minnesota Court of Appeals recently applied *Molina-Martinez* to a Minnesota sentence. In *State v. Provost*, 901 N.W.2d 199 (Minn.App. 2017), the appellant was sentenced to a middle-of-the-box sentence based on a criminal history score of six (6). *State v. Provost*, 901 N.W.2d 199, 201 (Minn.App. 2017). After Provost was sentenced, he successfully petitioned the district court to vacate a 2015 conviction for possession of a firearm by an ineligible person based on the Minnesota Supreme Court's holding in *State v. Haywood*, 886 N.W.2d 485, 486 (Minn. 2016), that an air powered BB gun is not a firearm. *Id.* at 201. Based on this, Provost moved for resentencing because without the 1.5 points from that conviction, his criminal history score was four (4). *Id.* The district court summarily denied the request for resentencing, concluding that it did not have authority to modify Provost's sentence because the 48-month sentence provost received was still within the Guideline range using his correct criminal history score. *Id.* at 201-02. The Court of Appeals rejected that argument based on *Molina-Martinez*, and held that appellant should be resentenced based on the correct criminal-history-score range, stating:

> We agree with the conclusion reached in Molina-Martinez that, because the sentencing guidelines serve as the anchor for a district court's discretion at sentencing, "when a [g]uidelines range moves up or down, offenders' sentences tend to move with it." *Id.* at 1346 (alteration omitted) (quotation omitted). Given the great discretion vested in the district court in sentencing matters, we recognize that not every defendant who receives a sentence at the top or bottom end of the presumptive range when sentenced with an incorrect criminal history score need necessarily receive a similarly situated sentence within the presumptive range when resentenced with a correct criminal history score. However, when a defendant is sentenced based

> on an incorrect criminal history score, a district court must resentence the defendant.
>
> DECISION
>
> Because a sentence based on an incorrect criminal history score is an unauthorized sentence subject to correction under Minn. R. Crim. P. 27.03, subd. 9, even if the sentence would still be within the presumptive sentencing guidelines range when calculated with the correct criminal history score, we reverse the district court's denial of Provost's motion to correct his sentence and remand for proceedings consistent with this opinion.

Id. at 202. More recently, the United States Supreme Court has held that a miscalculation in the sentencing guideline range is an error, that, in the ordinary case, seriously affects the fairness, integrity, or public reputation of a judicial proceeding such that it must be addressed even if raised for the first time on appeal. *Rosales-Mireles v. United States*, 138 S.Ct. 1897, 1903 (2018).

Mr. Hodges' situation is very similar to that of Molina-Martinez's, Rosales-Mireles', and Provost's. When Mr. Hodges made his plea agreement, entered his plea, and waived his rights, he did so on the belief that his criminal history score was five (5) and that the minimum 260-month sentence contemplated was the bottom of the box in the correct sentencing range and that he had effectively capped the length of his sentence at the presumptive sentence for 5 criminal history points, which was 306 months. At his sentencing, though this error was brought up, nothing was done to determine whether Mr. Hodges desired to proceed with the plea and sentencing under it given the fact that he had entered the plea in reliance upon the belief his criminal history score was five (5). See Minn. R. Crim. P. 15.04, Subd 3 (stating if the court rejects the plea agreement, it must advise the parties in

open court and then call upon the defendant to either affirm or withdraw the plea.). Because this was never discussed, there is insufficient evidence in the record to determine whether his plea was valid. *See Moctezuma v. State*, A10-170 (Minn.App. 2010).

Because Mr. Hodges has shown, using very recent cases that are very similar to his own, that his sentence was not authorized, because it was negotiated using an incorrect criminal history score, and because nothing was done to remedy that, or even determine what Mr. Hodges wanted to do, Mr. Hodges has met the minimal threshold necessary to receive a certificate of appealability.

In concluding that no reasonable jurists would disagree with the district court's denial of Mr. Hodges's petition despite the existence of very similar cases in which relief was granted by other reasonable jurists, the Eighth Circuit applied a heightened standard above that which is prescribed by statute.

B. Mr. Hodges received ineffective assistance of counsel.

A defendant's right to counsel extends to the plea-bargaining process. *Missouri v. Frye*, 132 S.Ct. 1399,1410 (2012); *Padilla v. Kentucky*, 130 S.Ct. 1473, 1486 (2010); *Hill v. Lockhart*, 474 U.S. 52, 60 (1985). The same two-part test from *Strickland v. Washington* applies to ineffective claims arising out of the plea process. *Hill v. Lockhart*, 474 U.S. at 57. The United States Supreme Court has held that failure of counsel to communicate a plea offer to the defendant satisfies the first *Strickland* prong. *See Missouri v. Frye*, 132 S.Ct. 1399,1408 (2012). In

addressing the duties of counsel in relation to a formal plea officer, the Court stated:

> This Court now holds that, as a general rule, defense counsel has the duty to communicate formal offers from the prosecution to accept a plea on terms and conditions that may be favorable to the accused. Any exceptions to that rule need not be explored here, for the offer was a formal one with a fixed expiration date. When defense counsel allowed the offer to expire without advising the defendant or allowing him to consider it, defense counsel did not render the effective assistance the Constitution requires.

Id. This is also required by the Minnesota Rules of Professional Conduct. See MN. R. Prof. Cond. 1.4(a); MN. R. Prof. Cond. 1.2(a).

In order to establish the prejudice prong of the *Strickland* test, a defendant must show that but for the ineffective advice of counsel there is a reasonable probability that the plea offer would have been presented to the court. *Lafler v. Cooper*, 132 S.Ct. 1376, 1385 (2012). This means showing that the defendant would have accepted the plea and the prosecution would not have withdrawn it in light of intervening circumstances, that the court would have accepted its terms, and that the conviction or sentence, or both, under the offer's terms, would have been less severe than under the judgment and sentence that in fact were imposed. *Lafler v. Cooper*, 132 S.Ct. 1376, 1385 (2012). Even if the trial itself is free from constitutional flaw, the defendant who, based on the deficient performance of counsel, goes to trial instead of taking a more favorable plea may be prejudiced, as element of ineffective assistance of counsel, from either a conviction on more serious counts or the imposition of a more severe sentence. *Lafler*, 132 S.Ct. at 1387. Court in this Circuit and elsewhere have concluded that giving a defendant incorrect

advice related to his criminal history score and sentencing range constitutes ineffective assistance. *See U.S. v. Penoncello*, 358 F.Supp.3d 815 (D. Minn. 2019) (Finding ineffective assistance of counsel where, in part, counsel repeatedly and inaccurately informed the defendant of the sentencing range.); *U.S. v. McCoy*, 215 F.3d 102, 108 (D.C. Cir. 2000) (counsel's error in calculating sentencing range that subjected defendant to additional six years of prison time, stating a "defendant's understanding of the maximum penalties he will face it he enters a guilty plea may be critical importance to the … decision to accept the Government's officer rather than assume the risks of trial." (citing *U.S. v. Horne*, 987 F.2d 833, 840 (1993) (Buckley, J. concurring)).

Mr. Hodges has also identified United States Supreme Court cases such as *Molina-Martinez v. United States*, and *Rosales-Mireles v. United States*, which support his argument. He has also identified case law from the Minnesota Court of Appeals, in *Provost*, that supports his position, in addition to federal cases that also support that position. *See United States v. Onick*, 702 Fed.Appx. 231, 232 (5th Cir 2017) ("In the context of sentencing, an error affects an appellant's substantial rights when there is a reasonable probability that, but for the error, he would have received a lesser sentence" *United States v. Kirkland*, 851 F.3d 499, 503 (5th Cir. 2017) (cleaned up). The application of the enhancement under § *2K2.1(a)(4)(A)* resulted in an increase in Onick's Guideline range from between eighteen and twenty-four months of imprisonment to between thirty-seven and forty-six months of imprisonment. The Supreme Court has held that "[i]n most cases, a defendant

who has shown that the district court mistakenly deemed applicable an incorrect, higher Guidelines range has demonstrated a reasonable probability of a different outcome. *Molina-Martinez v. United States*, 136 S.Ct. 1338, 1346, 194 L.Ed.2d 444 (2016)"); *See also United States v. Marroquin*, 884 F.3d 298, 301 (5th Cir. 2018) ("The next issue is whether Marroquin can show that this obvious error substantially affected his sentence. Taking away the two points that should not have been included reduces his criminal history category from a V to a IV. That would result in an advisory Guideline range of 15 to 21 months instead of the range of 21 to 27 months the court used in sentencing Marroquin. When "a defendant is sentenced under an incorrect Guidelines range" the error will usually result in prejudice to the defendant. *Molina-Martinez v. United States*, 136 S.Ct. 1338, 1345, 194 L.Ed.2d 444 (2016).")

Because caselaw support Mr. Hodges' contention that he was denied the right to effective counsel, he has shown that reasonable jurists could find the assessment of the District Court debatable or wrong. 28 U.S.C. §2553(c)(2); *Miller-El v. Cockrell*, 537 U.S. 322, 327 (2003).

In concluding that no reasonable jurists would disagree with the district court's denial of Mr. Hodges's petition despite the existence of very similar cases in which relief was granted by other reasonable jurists, the Eighth Circuit applied a heightened standard above that which is prescribed by statute.

CONCLUSION

For the reasons stated above, Mr. Hodges respectfully requests that this Court grant this petition for certiorari.

Respectfully submitted.

Dated: September 6, 2022

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