No. 22-6031

In the Supreme Court of the United States

ANTOINE EDWARDS,
Petitioner,
v.
STATE OF LOUISIANA,
Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE
LOUISIANA SUPREME COURT AND COURT OF APPEAL, FOURTH CIRCUIT

BRIEF IN OPPOSITION

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QUESTIONS PRESENTED

(1) Does requiring convicted inmates to labor at low wages constitute illegal slavery or involuntary servitude?

(2) Does an unspecified executive order "for human trafficking and slavery" require that Louisiana immediately release convicted inmates serving their sentences?

(3) Is Louisiana's alleged imprisonment of "a lot of people" with 10-2 jury convictions contrary to the supremacy clause, and is Edwards' imprisonment contrary to the © AA22141 treaty?

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Statutes

Other Authorities

Rules

Constitutional Provisions

INTRODUCTION

In 2016, petitioner Antoine Edwards shot and killed brothers Joshua and Ryan Johnson at the house from which Edwards sold drugs, "suppl[ying] the majority of the drug dealers in the area." Pet. App. at 9. In 2019, after a trial in which the evidence presented against Edwards was "overwhelming," a unanimous jury found him guilty of both murders. *Id.* at 24, 5. Appeals followed, culminating in Edwards' pro se petition for a writ of certiorari in which he asks this Court to consider three questions, none of which—with the exception of Edwards' suggestion that his imprisonment is "contrary to the © AA22141 treaty"—were raised in or resolved by any state court. Specifically, he asks this Court to consider (1) whether requiring convicted inmates to labor at low wages constitutes illegal slavery or involuntary servitude; (2) whether an unspecified executive order "for human trafficking and slavery" requires that Louisiana immediately release convicted inmates serving their sentences; and, (3) whether Louisiana's alleged imprisonment of "a lot of people" with 10-2 jury convictions is contrary to the supremacy clause, and whether Edwards' imprisonment is "contrary to the © AA22141 treaty."[1] Pet. at 2.

This Court should deny Edwards' petition for many reasons. First, Edwards did not raise these issues below, so no Louisiana court considered them. They are therefore not properly before this Court, which is "a court of review, not of first view[.]" *Cutter v. Wilkinson*, 544 U.S. 709, 718, n.7 (2005). "[This] Court has

[1] Edwards' third question presented is quite lengthy and appears in large part to expand upon his first two questions.

consistently refused to decide federal constitutional issues raised here for the first time on review of state court decisions." *Webb v. Webb*, 451 U.S. 493, 499 (1981).

Second, the questions involve factual issues both unrelated and temporally subsequent to Edwards' prosecution and trial—including the imprisonment of individuals convicted by non-unanimous juries and prison labor rendered by Edwards. The record lacks any relevant material about these issues, so they are entirely unfit for consideration as part of this direct appeal of his conviction. Moreover, Edwards' questions relate to the conditions of his confinement, which "cannot be appealed on direct review but rather must be brought in a separate civil action." *United States v. Carmichael*, 343 F.3d 756, 759 (5th Cir. 2003).

Third, even if properly raised before this Court, Edwards would lack standing to bring his question related to non-unanimous jury convictions because his convictions were both unanimous.

Fourth, even if Edwards' questions were properly before this Court and he had standing to raise them, he fails to identity any reason—such as a conflict in authorities below—why the Court should use its precious resources to answer his questions. "This Court, therefore, has no law-clarifying role to play."[2] *Cavazos v. Smith*, 565 U.S. 1, 10 (2011) (Ginsburg, J., dissenting).

Edwards' petition should be denied.

[2] This applies with equal force to the legion other issues beyond Edwards' questions presented that his petition mentions in passing, a handful of which the Louisiana court actually considered. *See* Pet. at 8–10. So, even if the Court were inclined to attempt to formulate additional questions presented from Edwards' petition, for the same reasons, none merits review.

STATEMENT OF THE CASE

A. Factual and Procedural Background

Petitioner Antoine Edwards murdered two brothers, Joshua and Ryan Johnson, in the summer of 2016. The brothers had come to the New Orleans house from which Edwards sold drugs, "suppl[ying] the majority of the drug dealers in the area[,]" in the hopes of purchasing marijuana from him. Pet. App. at 9. But—in what proved to be a fatal mistake—the brothers knocked on the front door instead of the back door, which was the designated entry point for such customers. An argument ensued, and Edwards refused to sell them any drugs. *Id.* at 11. The conflict culminated in Edwards shooting and killing Joshua and Ryan. *Id.* at 10.

Afterwards, Edwards openly discussed committing the murders, even declaring that "he was going to shoot the [brothers'] funeral up." *Id.* Likewise, he boasted that "when the police came after him he was 'going out with a bang[]'" and that "he was going to 'shoot at them.'" *Id.* at 11. But when the New Orleans police contacted Edwards to inform him that they had a warrant for his arrest, he did no such thing. While he initially agreed to simply turn himself in, he instead fled to Atlanta, where he was apprehended. *Id.* at 8.

Edwards was charged by bill of information with the second-degree murders of the Johnson brothers and with obstruction of justice in the murder investigation, although the state eventually dismissed this last count. *Id.* at 5. After a three day trial in September 2019 at which the evidence against Edwards was "overwhelming," a unanimous jury found Edwards guilty of both murders. *Id.* at 24, 5. The court then sentenced Edwards to two concurrent life sentences. *Id.* at 5–6.

Edwards did not timely appeal his conviction. However, he eventually filed an application with the trial court seeking an out-of-time appeal, which was granted in March 2021. Pet. App. at 6. So, in October 2021, Edwards filed two briefs before the Louisiana Fourth Circuit Court of Appeal, one counseled and one pro se. Across these two briefs, Edwards raised six claims of error, none of which are related to the questions he presents to this Court in his petition for a writ of certiorari. These six claims related to (1) this Court's decision in *Napue v. Illinios*, 360 U.S. 264 (1959) regarding the elicitation of false testimony; (2) purported hearsay; (3) arguments the state made in its closing that Edwards deemed improper; (4) the use of certain evidence in trial; (5) the effectiveness of Edwards' trial counsel; and (6) Edwards' claim that under the "Moorish American Zodiac Constitution" he was not subject to the court's jurisdiction. *See* Pet. App. at 14–28.

In a thorough opinion, the Louisiana Fourth Circuit Court of Appeal rejected all of Edwards' claims. *Id.* Edwards filed a timely counseled writ application to the Louisiana Supreme Court in which he raised claims (1) and (2) only. He also filed an untimely pro se writ application. In May 2022, the Louisiana Supreme Court denied the timely writ application. *Id.* at 1. On the same day, it issued an order explaining that it had not considered Edwards's pro se petition because it was untimely. *State v. Edwards*, 338 So.3d 1184 (La. 2022). Edwards filed an application for reconsideration of the untimely petition, which the Louisiana Supreme Court also denied. Pet. App. at 2. His pro se petition to this Court—in which he presents three questions entirely unrelated to his claims in the Louisiana court—followed.

B. Edwards' Other Litigation

Meanwhile, Edwards has proven to be a prolific pro se litigator in courts both state and federal. Indeed, in an August 2022 order, the Louisiana Fourth Circuit Court of Appeals noted that Edwards "has a litigious history with this Court regarding claims that have already been considered and decided . . . . In addition, [Edwards] has filed at least seven prior writ applications in this Court." *State v. Edwards*, 2022-K-0529 (Aug. 12, 2022). Edwards also has filed three suits in federal district courts in which he brings a myriad of claims which defy succinct summarization, though some of them appear to be identical or similar to those appearing in the petition before this Court. In these suits, he has requested a variety of relief, including "immediate release and over [$]4,000,000 for remuneration" and to be made governor in order "to really help [his] people." *Edwards*, 2:22-CV-02171, Doc. No. 4 at 5 (E.D. La. 7/29/22).

Two of these cases have already been dismissed as legally frivolous. *Edwards v. Louisiana*, 2:22-CV-02171, Doc. 12 (E.D. La. 1/30/23); *Edwards v. Rheems*, 3:22-CV-00290, Doc. 34 (M.D. La. 2/07/23). As the United States Magistrate Judge detailed in her findings, conclusions, and recommendations advising dismissal in one of these cases, for example, Edwards claimed that a number of Louisiana officials, including Governor John Bel Edwards and the judge who presided over his trial, "committed federal and intentional torts against him when he was convicted in Orleans Parish District Court because the court lacked jurisdiction over him[]" based on his claimed status as a Moor. *Edwards v. Louisiana*, 2:22-CV-02171, Doc. 10 at 1 (E.D. La.

1/04/23). Further, "he allege[d] that his conviction was the result of intrinsic fraud and malicious prosecution, changing personal data, embezzlement, forgery, treason[,] RICO violation and false pretense[;]" that "he has been kidnapped and human trafficked . . . and held for ransom bond under unlawful confinement[;]" and that he "was subjected to false imprisonment, unlawful arrest, and slander, defamation and libel." *Id.* at 2.

In Edwards' suit seeking federal habeas corpus relief, in which he has filed ten supplemental memoranda to date, he advances similar claims and requests for relief. *See Edwards v. Hooper*, 2:22-CV-02199, Doc. No. 3 (E.D. La. 7/29/22). The magistrate judge has recommended this case be dismissed as well based on Edwards's failure to properly exhaust his state remedies. *Hooper*, 2:22-CV-02199, Doc. No. 25 (E.D. La. 1/27/2023).

In any event, before the Court today is only Edwards' direct appeal of his conviction. In his petition for a writ of certiorari, Edwards presents three questions to the Court. But Edwards raised none of these issues below, so the Louisiana court did not resolve any of them.

REASONS FOR DENYING THE PETITION

I. EDWARDS' QUESTIONS PRESENTED ARE NOT PROPERLY BEFORE THIS COURT

A. Edwards Failed to Raise His Questions Presented Below.

This Court is "a court of review, not of first view," *Cutter*, 544 U.S. at 718, n.7. Accordingly, "in the ordinary course [it] does not decide questions neither raised nor resolved below." *Glover v. United States*, 531 U.S. 198, 205 (2001); *see, e.g.*, *National*

Collegiate Athletic Ass'n v. Smith, 525 U.S. 459, 470 (1999) ("[W]e do not decide in the first instance issues not decided below."); *Daimler AG v. Bauman*, 571 U.S. 117, 146 (2014) (Sotomayor, J., concurring) ("We generally do not pass on arguments that lower courts have not addressed."). Indeed, "[this] Court has consistently refused to decide federal constitutional issues raised here for the first time on review of state court decisions." *Webb v. Webb*, 451 U.S. 493, 499 (1981); *see, e.g.*, *Adams v. Robertson*, 520 U.S. 83, 86 (1997) (dismissing writ of certiorari as improvidently granted because the state court "did not expressly address the questions on which [this Court] granted certiorari" because appellant did not properly present it to the state court).

In his petition, Edwards asks the Court to grant certiorari to consider three questions. But—with the exception of Edwards' suggestion that his imprisonment is "contrary to the © AA22141 treaty" as part of his lengthy third question presented—Edwards raised none of these questions below, nor did the state court resolve any of them. So, this Court should not consider them now.

B. There Is No Relevant Factual Record.

Edwards' questions implicate factual issues entirely distinct from and temporally subsequent to the factual subject matter of the proceedings below—Edwards' prosecution and trial. For example, there is absolutely nothing in the record about the imprisonment of individuals convicted by non-unanimous juries, nor is there anything about the labor rendered by Edwards while imprisoned. Nor should there be, because the proceedings below had nothing to do with these issues. So, there

is no relevant factual record to consider Edwards' questions, and they are not suited for this direct appeal of Edwards' conviction.

To the degree Edwards' questions relate to the conditions of his confinement—as his claim about prison labor certainly does—they "cannot be appealed on direct review but rather must be brought in a separate civil action." *United States v. Carmichael*, 343 F.3d 756, 759 (5th Cir. 2003). Edwards may only raise these issues in separate civil suits—as he has already done in his numerous other suits, *see supra* at 6–7—where a relevant factual record could be developed. They simply do not belong in this direct appeal of his conviction.

In short, consideration of the questions Edwards raises would require this Court to transmogrify itself from a court of review into a court of first view—without any relevant factual record to consider. Edwards provides no reason why the Court should so abandon its "ordinary course" to do so. *Glover*, 531 U.S. at 205. The Court should deny his petition as to all three questions presented for this reason alone.

C. Edwards Lacks Standing to Bring his Claim Related to *Ramos* Because His Conviction Was Unanimous.

The third question Edwards raises suggests that Louisiana is unlawfully holding prisoners convicted by non-unanimous juries. Pet. at 2. Edwards suggests that this is contrary to the supremacy clause, presumably in light of this Court's opinion in *Ramos v. Louisiana*, 140 S. Ct. 1390 (2020), which held that the Sixth Amendment right to a trial by jury requires a unanimous verdict to convict a defendant of a serious offense. Though it is not at all clear which inmates Edwards is referring to, what is clear is that he lacks standing to bring this complaint for the

simple reason that his jury conviction was unanimous. *See* Pet. App. at 5. As this Court has explained, "[i]n limiting the judicial power to 'Cases' and 'Controversies,' Article III of the Constitution restricts it to the traditional role of Anglo–American courts, which is to redress or prevent actual or imminently threatened injury to persons caused by private or official violation of law." *Summers v. Earth Island Institute*, 555 U.S. 488, 492 (2009). And "[t]he doctrine of standing is one of several doctrines that reflect this fundamental limitation. It requires federal courts to satisfy themselves that 'the plaintiff has alleged such a personal stake in the outcome of the controversy as to warrant his invocation of federal-court jurisdiction.'" *Id.* at 493 (quoting *Warth v. Seldin*, 422 U.S. 490, 498–99 (1975)).

Here, Edwards lacks standing because his convictions were both unanimous. *See* Pet. App. at 5. So, even if Louisiana was imprisoning individuals in defiance of this Court's ruling in *Ramos*—to be clear, the state denies doing anything of the sort—any injury Edwards suffered would not be "fairly traceable" to that action, nor could it be "redressed by a favorable judicial decision[]" on this issue. *Spokeo, Inc. v. Robins*, 578 U.S. 330, 338 (2016). In short, Edwards would not have "such a personal stake in the outcome of the controversy as to warrant his invocation of federal-court jurisdiction." *Summers*, 555 U.S. at 493. This Court should deny Edwards' petition as to his *Ramos*-related question.

II. EVEN IF THE QUESTIONS EDWARDS PRESENTS WERE PROPERLY BEFORE THIS COURT, NONE WOULD MERIT REVIEW.

A. Edwards Identifies No Reason to Consider His Questions.

Edwards fails to identify any reason why the Court should grant his petition

as to any of his questions presented. He does not, for example, suggest that the Louisiana court decided these issues in a way that conflicted with a decision of another state's high court or with a federal court of appeal. Nor could he, because the Louisiana court did not even consider these issues. "This Court, therefore, has no law-clarifying role to play." *Cavazos v. Smith*, 565 U.S. 1, 10 (2011) (Ginsburg, J., dissenting).

Moreover, because the court below did not consider these issues, Edwards' petition to this Court does not even amount to a request for mere "error correction." *See id.* ("Error correction is 'outside the mainstream of the Court's functions.'" (quoting E. Gressman, K. Geller, S. Shapiro, T. Bishop, & E. Hartnett, Supreme Court Practice § 5.12(c)(3), p. 351 (9th ed. 2007)). Rather, it is an invitation for this Court to invert itself into a court of "first view" in order to consider issues of no clear import or urgency that are not the subject of any conflict in the lower courts. And even if this Court nevertheless deemed these issues worthy of its attention, the lack of any relevant factual record or decision by the Louisiana court make this case an extraordinarily poor vehicle for their consideration.

B. The Thirteenth Amendment Expressly Allows Involuntary Servitude in Prison.

In any event, Edwards' suggestion that prison labor amounts to unconstitutional slavery is directly contrary to the plain text of the Thirteenth Amendment, which states that "[n]either slavery nor involuntary servitude, *except as a punishment for crime whereof the party shall have been duly convicted*, shall exist within the United States, or any place subject to their jurisdiction." U.S. Const.,

amend. XIII, section 1 (emphasis added). Unsurprisingly given the express exception in the amendment's text, "[i]t is well-settled that the Thirteenth Amendment's protection against involuntary servitude does not extend to prisoners who are required to perform work at little or no pay." *Shipley, Jr. v. Woolrich, Inc.*, Civil Action No. 09-0274, 2009 WL 331176, at *1 (D.D.C. Feb. 10, 2009).

Rather, "[t]he Thirteenth Amendment excludes convicted criminals from the prohibition of involuntary servitude, so prisoners may be required to work. . . . Further, there is no Constitutional right to compensation for such work; compensation for prison labor is 'by grace of the state.'" *Vanskike v. Peters*, 974 F.2d 806, 809 (7th Cir. 1992) (quoting *Sigler v. Lowrie*, 404 F.2d 659 (8th Cir. 1968)); *see Hale v. Arizona*, 993 F.2d 1387, 1394 (9th Cir. 1993) (en banc) ("Convicted criminals do not have the right freely to sell their labor and are not protected by the Thirteenth Amendment against involuntary servitude.") *abrogation recognized on other grounds by Walden v. Nevada*, 945 F.3d 1088, 1094 n.2 (9th Cir. 2019); *Berry v. Bunnell*, 39 F.3d 1056, 1057 (9th Cir. 1994) ("[T]he Thirteenth Amendment does not apply where prisoners are required to work in accordance with prison rules."); *Henthorn v. Department of Navy*, 29 F.3d 682, 686 (D.C. Cir. 1994) ("Convicted criminals do not have the right freely to sell their labor and are not protected by the Thirteenth Amendment against involuntary servitude.").

Edwards points to no authority to the contrary. This Court should not use its precious resources to address a question to which the Constitution provides an express and readily apparent answer that is uniformly accepted in the lower courts.

C. *Ramos* Does Not Apply Retroactively Under Either Federal or State Law.

The third question Edwards presents suggests that Louisiana is unlawfully holding prisoners convicted by non-unanimous juries. Pet. at 2. As discussed above, Edwards lacks standing to bring this claim because his jury conviction was unanimous. In any event, Edwards fails to acknowledge that, in *Edwards v. Vannoy*, 141 S. Ct. 1547 (2021), this Court held that the new rule announced in *Ramos* requiring unanimity does not apply retroactively on federal collateral review. And this past fall the Louisiana Supreme Court concluded that the *Ramos*' unanimous jury requirement does not apply retroactively on state collateral review either. *State v. Reddick*, ---So.3d----, 2022 WL 12338521 (La. Oct. 21, 2022). So, while Edwards' petition does not provide any detail as to which inmates he believes are being improperly imprisoned, to the degree that he is referring to inmates with non-unanimous verdicts whose convictions were final at the time *Ramos* was decided, their continued imprisonment is entirely consistent with this Court's holding in *Vannoy* and the Louisiana Supreme Court's in *Reddick*.

D. Edwards' Claim that Louisiana has Violated "the Treaty © AA22141 Marrakesh" is Patently Frivolous.

As part of his third question presented, Edwards states that his imprisonment is "contrary to the © AA22141 treaty" and later argues that it violates his "[inherent] birthright as a moor[]" and "the treaty © AA22141 Marrakesh," Pet. at 2, 9. This argument is patently frivolous. Edwards presented it more clearly before the Louisiana court, where he "argue[d] that as an African-American, under the 'Moorish

America Zodiac Constitution,'" he was not subject to the district court's jurisdiction. Pet. App. at 28.

Relying on a previous case explaining that "the United States does not recognize the Moorish Nation as a sovereign state[,]" the court rightly rejected Edwards' argument. *Id.*; *see Speed v. Mehan*, No. 4:13CV1841 SNLJ, 2013 WL 5776301, at *2) (E.D. Mo. Oct. 25, 2013) ("Fatal to plaintiff's assertion of immunity and defendants' alleged unlawful actions is the non-recognition of the Moorish Nation as a sovereign state by the United States." (collecting cases where courts concluded the same)).

III. ANY OTHER ISSUES ARE NOT PROPERLY BEFORE THIS COURT AND, IN ANY EVENT, ARE NOT WORTHY OF REVIEW.

A. Any Additional Issues Are Not Properly Before the Court Under Rule 14.1(a).

While Edwards only presents three questions to the Court, each of which this brief has addressed, his petition also includes a convoluted catalog of complaints, allegations, and issues that—to the degree that their meaning can be ascertained—appear to be mostly unrelated to the questions he actually raises. *See* Pet. at 8–10. And because, as explained above, Edwards' questions presented are distinct from and temporally subsequent to what actually occurred at trial, the passing references in his petition to trial-related issues actually raised before and addressed by the state courts are entirely unrelated to his questions presented.

As this Court's Rule 14.1(a) makes clear, the questions presented for this Court's review in a petition for a writ of certiorari "shall be set out on the first page

following the cover, and no other information may appear on that page. The statement of any question presented is deemed to comprise every subsidiary question fairly included therein." And this Court does not grant certiorari to consider issues beyond the questions so presented by a petitioner: "Only the questions set out in the petition, or fairly included therein, will be considered by the Court." *Id.*

Moreover, "[a] question which is merely 'complementary' or 'related' to the question[s] presented in the petition is not 'fairly included therein.'" *Izumi Seimitsu Kogyo Kabushiki Kaisha v. U.S. Philips Corp.*, 510 U.S. 27, 32 (1993) (quoting *Yee v. Escondido*, 503 U.S. 519, 537 (1992) (dismissing writ of certiorari as improvidently granted, where in order to reach the question actually presented, this Court would have to address a question not presented in the petition)). And "the fact that [a petitioner] discussed [an issue] in the text of [his] petition for certiorari does not bring it before [this Court]." *Id.* at 31, n.5.[3]

Here, most of the additional issues the later pages of Edwards' petition pass upon—including those related to what actually occurred at trial and the Louisiana

[3] In *Yee*, 503 U.S. at 536–37, this Court detailed the reasons for Rule 14.1(a):

> "First, it provides the respondent with notice of the grounds upon which the petitioner is seeking certiorari, and enables the respondent to sharpen the arguments as to why certiorari should not be granted. Were we routinely to consider questions beyond those raised in the petition, the respondent would lack any opportunity in advance of litigation on the merits to argue that such questions are not worthy of review. Where, as is not unusual, the decision below involves issues on which the petitioner does not seek certiorari, the respondent would face the formidable task of opposing certiorari on every issue the Court might conceivably find present in the case."

And "[s]econd, Rule 14.1(a) assists the Court in selecting the cases in which certiorari will be granted."

court's resolution of them—are entirely unrelated to the questions Edwards actually presents, so they are not appropriate for this Court's consideration.

B. This Court Lacks Jurisdiction to Review Most of Edwards' Evidentiary Objections.

Even if, notwithstanding Rule 14.1(a), this Court were inclined to consider the evidentiary issues mentioned in passing in the later pages of Edwards' petition, it would encounter jurisdictional problems. In his petition, Edwards objects to his "pretrial misidentification when there was no witnesses, no element of the crimes just hearsay in the crimestopper tips. The guys was in Trumell girlfriend all type of hearsay." Pet. at 9. It is not clear what particular evidence Edwards is describing and, in any event, his objection appears directed only to its use in the pretrial context. But to the degree that he is referring to evidence actually presented at trial and addressed in the Louisiana court's opinion, this Court lacks jurisdiction to review its admission because of Edwards' failure to timely object to most of it, which constitutes a waiver under Louisiana law. Pet. App. at 20, 21. As the Louisiana court explained, Louisiana Code of Criminal Procedure article 841 provides that "[a]n irregularity or error cannot be availed of after verdict unless it was objected to at the time of occurrence." *Id.* at 17–18. Rather, "[a] defendant must state the specific error so that the trial court has the opportunity to make the proper ruling to prevent or cure any possible error. The defense is limited on appeal to those grounds articulated at trial." *State v. Keys*, 2012-1177 (La. App. 4 Cir. 9/4/13), 125 So. 3d 19, 31, *writ denied sub nom. State v. Keyes*, 2013-2367 (La. 4/4/14), 135 So. 3d 637.

This Court has "long recognized" that it lacks jurisdiction to review state court cases where the state court's decision is based at least in part on an adequate and independent state-law ground. *Michigan v. Long*, 463 U.S. 1032, 1038, n.4 (1983). And "[i]t is well-settled that the contemporaneous-objection rule is an independent and adequate state procedural ground." *Duncan v. Cain*, 278 F.3d 537, 541 (5th Cir. 2002) (concluding that a Louisiana court's determination that an argument against the constitutionality of a jury charge was waived based on the contemporaneous-objection rule was an independent and adequate state law ground such that the federal courts could not consider the claim on habeas review); *see Downs v. Lape*, 657 F.3d 97, 103–104 (2d Cir. 2011) (concluding the same with respect to New York's contemporaneous-objection rule). Accordingly, this Court would lack jurisdiction to review the evidentiary issues Edwards untimely raised.

C. Even If Any Additional Issues Were Properly Before the Court, Edwards' Petition Seeks Mere Error Correction.

Even if Rule 14.1(a) and jurisdictional defects did not preclude this Court's review, Edwards does not identify any reason why this Court should consider the additional issues mentioned in his petition or addressed by the Louisiana court. For example, he does not suggest that there is a conflict among lower courts on any of these issues. As such, there is no apparent "law-clarifying role" for this Court to play concerning these issues; mere "error correction" is not a traditional function of this Court. *Cavazos*, 565 U.S. at 10 (Ginsburg, J., dissenting).

In sum, Edwards' petition—even in the few places it mentions in passing issues actually addressed by the Louisiana court—at best amounts to a request for error

correction without any explanation whatsoever of what Edwards believes those errors are. So, even to the extent that Edwards' petition can be read to raise issues additional to his questions presented, it should be denied.

CONCLUSION

The Court should deny the petition for a writ of certiorari.

Respectfully submitted,

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