

No. 23-5635

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**ORIGINAL**

IN THE  
SUPREME COURT OF THE UNITED STATES  
TERM,

FILED  
AUG 10 2023  
OFFICE OF THE CLERK  
SUPREME COURT, U.S.

William R Carter — PETITIONER  
(Your Name)

VS.  
People of the State of Illinois — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

Supreme Court of Illinois  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

William Raymond Carter  
(Your Name)

Shawnee C.C. 6665 St. Rte. 146 E.  
(Address)

Vienna, IL 62995  
(City, State, Zip Code)

N/A  
(Phone Number)

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SUPREME COURT, U.S.

## Questions Presented

Why in all the 1 year, 1 month, and 17 days in the McLean County detention center was cl. William Raymond Carter, never read my Miranda Rights and denied my 5+14 constitutional right of due process.

Why in the first 20 words of my alleged witnesses testimony was she able to <sup>Perjure</sup> herself under oath and testimony not be admitted

Why in all my months prior to my trial was it okay for my Lawyer Jennifer Patton to disregard any motions, subpoenas, or evidence to help me win my case. Was cl. cause she thought she could help the State railroad me, all for a check or because cl. didn't at the time understand the law, and thought cl. was an easy one to put away. Only a new trial can tell.

Why was cl. okay for my alleged witness to admit to what she appeared to say was an "under the table deal" with DCF's to prosecute me. (see cheat sheet to finish) People vs Clinger

witness Why was it okay for the State to have an Attorney that knew the lawyer (Adam Christ) of the and was the State Attorneys' (Ashley Scarbrough) old boss. (Spelling might be ~~off~~ off.) Scarbrough

Why was it okay for the States Attorney to credibility vouch for a witness before any testimony was ever given, and then constantly changes <sup>his</sup> story, which is a clear violation of falsely credibility vouching on the states behalf.

Why was it okay for my Public Defender (Jennifer Patten) to deny me access to my discovery. Also to deny me my 5<sup>th</sup> and 14<sup>th</sup> admenment rights and a fair trial in doing so.

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| CASES                      | PAGE NUMBER  |
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| People v. Olinger          | 245 Ill. App. 3D 903, 185 Ill. Dec. 924<br>615 N.E. 2D 794, 1993 Ill. App. Lexis 870<br>(ILL App. Ct. 3D Dist. 1993) |
| - Naupe v. Illinois        | (cit omitted)  |
| - U.S. vs. Giglio          | (cit. omitted)   |
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| - People v. Jimmerson      | (cit. omitted)   |
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| Gilmore v. Marks           | 613 F. Sup. 282 (C.A. 3. PA. 1986)   |
| Ohnn v. Coulter            | 142 Ariz. 109, 688 P. 2D 1001 (1984)   |
| STATUTES AND RULES         | Quarleria v. Hanslmaier 28 F. Sup. 2D 749 (E.D.N.Y. 1998)  |
| People v. Mason            | 60 Ill. App. 3D 463, 17 Ill. Dec. 730, 376 N.E. 2D 1059, 1978, Ill. App<br>Lexis 2675 (ILL App. Ct. 4th Dist. 1976)  |
|                            | 269 F.R.D. 497, 531 (2010 D.M.C.)  |
|                            | Fed. Sup. 282 (CA 3 PA. 1986)  |
|                            | Fed. R. of Procedure 102   |
|                            | Fed. R. of Evid 16(A) - G  |
|                            | Sup Ct. R. 802 Hearsay Testimony of States Witness   |
|                            | Sup. Ct. R. 701 & 702 Expert Testimony on Arson For Defen<br>+ Criminal Sexual Assault                               |

## OTHER

Cite Statute for perjury or case Law for perjury

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IN THE  
SUPREME COURT OF THE UNITED STATES  
TERM,

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 \_\_\_\_ 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 \_\_\_\_ 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 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 Ill. Sup. Ct. court 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.

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## JURISDICTION

☐ For cases from federal courts:

The date on which the United States Court of Appeals decided my case was \_\_\_\_\_.

☐ No petition for rehearing was timely filed in my case.

☐ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: \_\_\_\_\_, and a copy of the order denying rehearing appears at Appendix \_\_\_\_\_.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (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 5/24/23. A copy of that decision appears at Appendix A.

☒ A timely petition for rehearing was thereafter denied on the following date: 3/1/2023, and a copy of the order denying rehearing appears at Appendix B-1.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including N/A (date) on N/A (date) in Application No. A-\_\_\_\_\_.

The jurisdiction of this Court is invoked under 28 U.S.C. § 1257(a).

Jurisdiction

# Constitutional and Statutory Provisions Involved

Ill. Const, Art. I § 2, 6, 7, 8. Right to due Process  
U.S.C.A. 14th Amend. Right to due Process  
+ Fair Trial

IAC. Const, Amend 6th. U.S.C.A.

\* Napue v. Ill. (1959) 360 U.S. 150, 153, 31 L. Ed. 2012, 17, 1221, 79 S.Ct. 1173, 1177

\* US v. Giglio 405 U.S. 154, 31 L. Ed. 20108, 92 S.Ct. 766

\* Giglio v. US (1972) 405 U.S. 150, 153, 31 L. Ed. 20104, 108, 92 S.Ct. 763, 766

\* People v. Jimmerson 1995, 166 Ill. 2D 211, 223, 209 Ill. Dec. 738, 652 N.E. 2D 278

Dickerson v. U.S. 530 U.S. 428, 434, 120 Ct. 2326, 147 L. Ed. 2D 405 (2000) (confession test)

Cashin v. Coulter 142 Ariz. 109, 688 P.2D 1001 (1984)

Gilmore v. Marks 613 F.Supp. 282 (C.A.3 PA. 1986)

Quartararo v. Hansmaier 28 F.Supp. 2D 749 (E.D.N.Y. 1998)  
269 F.R.D. 497, 531 (2010 D.M.C.I.)

Fed. Supp 282 (CA.3 PA. 1986)

Fed. R. of Procedure 102

Fed. R. of Evid. 16(A) (G)

Sup. Ct. R. 802 Hearsay Testimony of States Witness

Sup. Ct. R. 701 + 702 Expert testimony on Criminal sexual assault + arson for Defense

Ct statute for perjury of case law for perjury or perjure  
720 ICCS 5/32-2



## Statement of Case

According to Kylie North on Sept 4th I randomly arrived at 506 Madison Street, and brought all my inside the house, Refused to leave, and later assaulted her. On the 6th of September she woke up with my hand around her neck asking her question. She said when I didn't like to question I squeezed harder. I later took her phone + hid it. Kylie said I then went to play video games. Kylie said I made her stay in her bedroom all day. On the 7th of September: Kylie said I had raped her + around noon was able to escape to her grandparents for several hours. When she came back on Sept. 7th around 6:30 Kylie said she went into the house + found the stove burners on high, turned them off and ran out the house. Kylie then found out I had posted a picture of her on Facebook. Kylie then decided to google if Wisconsin is extraditable before calling the police to report the rape + arson + battery she had received.

(Due to versions of her story to be impeached it is hard to accurately summarize the true versions of events.)

Reasons for granting the Petition  
I believe the petition should be granted  
because the State witness perjured herself  
multiple time and was cross-examined about  
that fact, the only answer she came up with  
was "I don't remember, it happened a year ago."  
She almost admits a deal was struck with  
Debs before her lawyer (Ashley Scarbrough)  
stops her from continuing.

My lawyer (Jennifer Patton) was very  
unprofessional & ineffective in many  
areas of pretrial and of trial. That I  
was railroaded by both parties.

There is still plenty of evidence to help  
me win my case & prove my innocence.

I would very much appreciate a new  
trial, also new State Attorney and Public  
Defender or Pro-se.

CONCLUSION

I, William Carter, believe it is not justice to be railroaded by the State of Illinois & the justice system. I mean its right there in the name, that's why I think.  
The petition for a writ of certiorari should be granted.

Respectfully submitted,



Date: 8/10/23