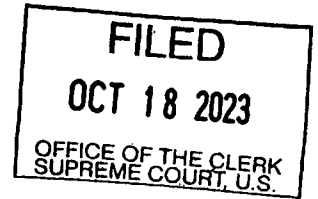


23 - 5948

No. 23-3114



IN THE  
SUPREME COURT OF THE UNITED STATES

Ramone Wright — PETITIONER  
(Your Name)

vs.

\_\_\_\_\_ — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

Sixth Circuit of Appeal  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

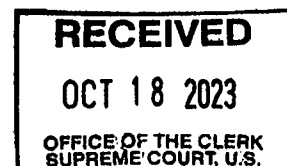
PETITION FOR WRIT OF CERTIORARI

Ramone Wright  
(Your Name)

Bennettsville SC po Box 52020  
(Address)

Bennettsville SC 29612  
(City, State, Zip Code)

N/A  
(Phone Number)



QUESTION(S) PRESENTED

- I Can provisions in USSC 3D1.1 and 3D1.2 be void if the aggregate total is different
- II Without proper notice of charge can a guilty plea stand where the nature of the charge was never read
- III In count(2) Does a firearm charge constitute a 924(c) conviction
- IIII If a defendant never received proffer of codefendant, does such denial make plea knowingly and intelligent

## TABLE OF CONTENTS

OPINIONS BELOW.....	1
JURISDICTION.....	
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED .....	
STATEMENT OF THE CASE .....	
REASONS FOR GRANTING THE WRIT .....	
CONCLUSION.....	

## INDEX TO APPENDICES

APPENDIX A *Sixth circuit of Appeals - case No 23-3114*

APPENDIX B

APPENDIX C

APPENDIX D

APPENDIX E

APPENDIX F

**TABLE OF AUTHORITIES CITED**

CASES 23-3114

PAGE NUMBER

STATUTES AND RULES

OTHER

## 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

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☒ is unpublished.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 \_\_\_\_\_ 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 9-20-2023.

☐ 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 \_\_\_\_\_.  
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

1) USSC 3D1.1 and 3D1.2 - ambiguous sentence

I The Judge in imposing sentence in the cases subsequent to the first rendered ~~the~~ the subsequent sentence so ambiguous that in accordance with the rule that an ambiguity in sentence must be construed most favorable to the defendant

II Rule 11 error is not harmless when it affects a defendant's substantial rights. Fed. R. Crim. P. 11(h), indeed, structural errors affect the entire conduct of the trial from beginning to end and therefore cannot be harmless

III Violation Brady material: Information of evidence that is favorable to a defendant's case and that the prosecution has a duty to disclose - The prosecution's withholding of such information violates the defendant's due process right

## STATEMENT OF THE CASE

- I Based on the grouping provisions in USSC 301.1 and 301.2  
count 1 37 months 84 months on count 2 to run consecutively  
to counts 1 and 4 but concurrently to count 3; 37 months on count  
3 to run concurrently to all other counts and 89 months on count 4  
to run consecutively to consecutively to counts 1 and 2 but  
concurrently to count 3 - the aggregate total 180 months  
The sentence proceeding suffered from a fundamental defect  
which inherently resulted in a complete miscarriage of justice  
(see Exhibit 1)
- II Transcript 05/08/17, ECF NO 8, 9 pages 173 case 2:16-cr-00089  
"How do you pled to count 2, the firearm charge?" Before accepting  
a plea of guilty, the court must inform a defendant of, and con-  
firm that he understands the nature of the charge to which he is  
pleading - Fed. R. Crim. P. 11(b)(1)(G) Rule 11's purpose is to ensure  
that a defendant is fully informed of the nature of the charges  
against him and the consequences of his guilty plea. (see Exhibit 1, 2)
- III Transcript 05/08/17 ECF NO 9, 10 pages 141 case 2:16-cr-00089  
"We haven't given them the latest on Mr. Satterwhite's proffer,  
the government stated in open court defendant did not have all  
the evidence favorable to his defense to make ~~the~~ <sup>review</sup> the matter  
of his own defense - An error has been deemed  
structural in instances where the right at issue is not  
designed to protect the defendant from erroneous conviction  
but instead protects some other interest, such as the  
fundamental legal principle that a defendant must be allowed  
to make his own choices about the proper way to protect  
his own liberty (Exhibit B2)

## **REASONS FOR GRANTING THE PETITION**

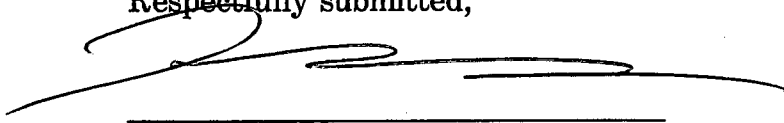
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For equal protection of law, to prevent injustice in which might undermine the public confidence in the judicial system ~~~~~

**CONCLUSION**

The petition for a writ of certiorari should be granted.

Respectfully submitted,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke.

Date: 10-13-2023