

23-6945

No.

CHINA

IN THE
SUPREME COURT OF THE UNITED STATES

FILED
OCT 05 2023
OFFICE OF THE CLERK
SUPREME COURT, U.S.

Ronnie Cornell Cosby — PETITIONER
(Your Name)

United States
of America vs. — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

UNITED STATES DISTRICT COURT, Hammond, IN 46320
U.S. COURT OF APPEALS 7th CIRCUIT, Chicago, IL 60604-1874
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Ronnie Cornell Cosby

(Your Name)

P.O. Box 33

(Address)

TERRE HAUTE, I.N. 47802

(City, State, Zip Code)

(Phone Number)

QUESTION(S) PRESENTED

~~See attached Grounds 112~~

1. When a statute makes it a crime to travel in commerce or across state lines with an improper or intent, can the government manufacture federal jurisdiction over local criminal activity by splitting a round trip taken ~~and~~ into two parts as to permit that travel home was for an illegal purpose? Should this be prohibited by Mortensen?
2. When a statute criminalizes travel in commerce or across state lines with an improper purpose or intent, must that be the dominate motive of the travel? As Mortensen has required. OR can it just be a motivating purpose?
3. Are the 5th and 14th Amendments violated when the court adds excessive elements to jury instructions to a charged count that is not in the indictment without going through the grand jury as Strikeone requires? OR can the element be added without notice of grand jury?
4. Does the mistake of age defense provided in 18 U.S.C. 2423(g) extend to section 2423(A) of the statute when the government makes victim's age an issue during statements and questions in direct examination, closing arguments and closing arguments rebuttal? When the government ultimately relies on mistake of age, can defense of (2423g) be acquired?

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

See attached Grounds 1+2

TABLE OF AUTHORITIES CITED

CASES

PAGE NUMBER

See attached Grounds 1+2

STATUTES AND RULES

See attached Grounds 1+2

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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 NA to the petition and is Appeals No. 22-2161
 reported at 2:15-CR-31-PPS: District Court, 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 NA to the petition and is
[] reported at 2:15-CR-31-PPS; 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 MARCH 22, 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: MAY 04 2023, and a copy of the order denying rehearing appears at Appendix N/A.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on October 7th 2023 (date) in Application No. N/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

~~See attached Grounds 1-2~~

J

STATEMENT OF THE CASE

~~See attached Grounds 1+2~~

Statement to questions 1+2

The seventh circuit dismissed Mortensen as a narrow and fact bound decision. The court should clarify Mortensen's dominant motive test.

Statement to question 3

Stilone set precedence as to any court added elements to a crime that was not charged in the indictment. This case is an excellent vehicle to address ~~as~~ districts from adding elements to indictments and jury instructions ~~as~~ as they see fit.

Statement to question 4

A defendant should be persecuted when the government relies on mistake of age, only when the defendant could not use this defense as required in 2423 (A)

REASONS FOR GRANTING THE PETITION

~~See attached Grounds 112~~

Defendants rights were supremely violated by district court. The 5th and 14th Amendments were aggressively violated from all four questions asked. Please take notice and petition.

Thank you

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Rennie Cornell Cosley

Date: ~~December 15th~~
~~October 4th 2023~~
February 28th 2024