

23-7582

No. _____

ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES

OF AMERICA

MANNA MASSAQUOI — PETITIONER/PRO-SE
(Your Name)

vs.

COMMONWEALTH OF PENNSYLVANIA — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

PENNSYLVANIA SUPREME COURT

(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

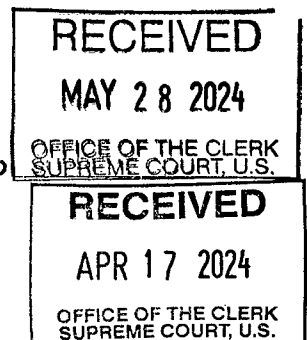
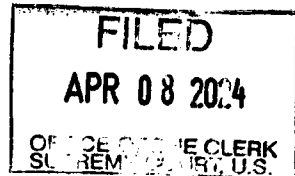
PETITION FOR WRIT OF CERTIORARI

MANNA MASSAQUOI, PRO-SE
(Your Name)

830 Pine Hill Road
(Address)

JENA, LA 71342
(City, State, Zip Code)

318-992-7800/973-318-4866
(Phone Number)



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

As listed in direct APPEAL APPEALS and PCRA APPEALS.
Photocopies of Appendixes will send to this Court when
I am given access to a photocopier to make my photocopies.

QUESTION(S) PRESENTED

1. Did the Pennsylvania Supreme Court erred in not finding that the PCRA Court & Pennsylvania Superior Court erred by not granting requested reliefs.
2. Do Prose Petitioner needs an attorney appointed by the United States Supreme Court of America to adequately Amend this Petition for Certiorari and or represent him?
3. Was Petitioner's previous counsels ineffective for ineffective ASSISTANCES?
4. Will Petitioner Amend or Supplement this Petition upon his released with additional newly discovered evidence, and or request this Court to ~~exhaust~~ allow him exhaust additional newly discovered evidence in the state courts?

4*

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

APPENDIX B

APPENDIX C

APPENDIX D

APPENDIX E

APPENDIX F

None attach because I'm being denied access to a photocopier by the DHS/ICE and GTO Group, Inc. employees within their civil detention custody at the Caselle Detention Facility - Central Louisiana ICE Processing Center.

5*

TABLE OF AUTHORITIES CITED

CASES

PAGE NUMBER

STATUTES AND RULES

OTHER

As listed in my direct appeal appeals and PCRA appeals.

6*

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 _____ 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 No. 282 EAL 2023; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the Pennsylvania Superior court appears at Appendix _____ to the petition and is

- ☒ reported at No. 1598 EDA 2023; 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 _____.

☐ 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 2/6/24.
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).

8*

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Fourteenth Amendment, Sixth Amendment, Eighth Amendment, & Etc. as written in my direct appeal appeals and PCRA appeals, including the reasons for granting the petition in this petition.

94.

STATEMENT OF THE CASE

As stated in the Statement of the Case in Petitioner's appellate brief (No. 1598 EDA 2022) to the Pennsylvania Superior Court.

REASONS FOR GRANTING THE PETITION

Ineffective ASSISTANCES of all previous counsels, from pre-trial to appellate counsels, to investigate or adequately investigate, to gather evidence, to raise weight of the prosecution evidence being unable to meet the burden of proof and was contrary to the verdict, failure to object and preserve all appealable issues, failure to collect the seven letters written to the Petitioner while on pre-trial by the complainant, failure to raise the complainant previous false criminal accusations (#MC-57-CR-0038704-2009) against the Petitioner, failure to raise entrapment, failure to interview complainant and witnesses, dismissed all the charges and verdict with prejudice, grant a new trial, and all other reliefs deemed necessary by this Court. Including newly discovered evidence, mental incompetency, and etcetera.

Petitioner also request this Court to appoint him a counsel to adequately amend this Petition and represent him. Petitioner is a civil detainee currently in the Immigration & Customs Enforcement "ICE" Department of Homeland Security "DHS" civil detention custody since 8/10/2022 being subjected to indefinite detention, criminal convicts conditions of confinement, denial of access to the main general law library and criminal appeal legal materials and researches by

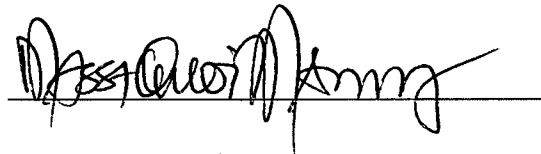
- 11 *
- both the DHS/ICE and GEO Group, Inc. employees.

Petitioner did not and can not attach any appendix photocopies or require photocopies because of the DHS/ICE and GEO Group, Inc. employees refusal to provide me access to photocopier, typewriter, criminal appeal legal materials, and etcetera. Petitioner is not a threat to national security but is being subjected to restraints via handcuffs/shackles as a civil detainee on criminal convicts policies/procedures/punishments. Any additional reliefs deem necessary by this Court.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,



Date: April 03, 2024