No. 23-7691

ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES

ROBERT A. ESPINOZA,

PETITIONER, pro se,

vs.

UNITED STATES OF AMERICA,

RESPONDENT.

PETITION FOR WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

PETITION FOR WRIT OF CERTIORARI

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QUESTION PRESENTED

Illinois' Attempt offenses have two elements: an intent to commit a specific offense and a substantial step towards commission of the offense. Neither element need not involve the use, attempted use, or threatened use of physical force against the person or property of another. The questions presented are:

1) After this Court's decision in Taylor (2022), can an Illinois' attempt offense be a predicate crime of violence for an 18 U.S.C. § 924(c) offense?

2) Does an intervening change in statutory interpretation by the Supreme Court allow relief for a petitioner, pursuant to Recall the Mandate even on a closed case?

CORPORATE DISCLOSURE STATEMENT

Petitioner, Robert A. Espinoza, pro se, is not a corporation, therefore, there is no publicly held company owning 10% or more.

TABLE OF CONTENTS

Page:

INDEX TO APPENDIX

TABLE OF AUTHORITIES

Page:

CASES

STATUTES

CONSTITUTIONAL PROVISIONS

OTHER AUTHORITIES

IN THE

SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner, Robert A. Espinoza, pro se, respectfully prays that a writ of certiorari issue to review the judgment below of the United States Court of Appeals for the Seventh Circuit, issued on January 4, 2024, denying Petitioner's motion to Recall the Mandate, affirming the denial of Petitioner's authorized successive motion to vacate his sentence filed pursuant to 28 U.S.C. § 2255, issued on February 1, 2018.

OPINION BELOW

The decision of the United States Court of Appeals for the Seventh Circuit (Pet. App. 1a) is unpublished. Case No. 17-3279 (January 4, 2024). Petitioner timely filed a petition for rehearing and petition for rehearing en banc but the Seventh Circuit returned Petitioner's petition for rehearing and petition for rehearing en banc unfiled and Petitioner never recieved anything in the mail. The Seventh Circuit claimed the case was closed.

JURISDICTION

The judgment of the Court of Appeals was entered on January 4, 2024. (Pet. App. 1a). A timely petition for rehearing and petition for rehearing en banc was returned but never recieved. The Court of Appeals had jurisdiction pursuant to 28 U.S.C. §§ 1291 and 2253. This Court has jurisdiction pursuant to 28 U.S.C. § 1254(1).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Title 28 United States Code § 2255(a):

> A prisoner in custody under sentence of a court established by Act of Congress claiming the right to be released upon the ground that the sentence was imposed in violation of the Constitution or laws of the United States, or that the court was without jurisdiction to impose such sentence, or that the sentence was in excess of the maximum authorized by law, or is otherwise subject to collateral attack, may move the court which imposed the sentence to vacate, set aside or correct the sentence.

Title 18 United States Code § 1962(c):

> It shall be unlawful for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity or collection of unlawful debt.

Title 18 United States Code § 924:

> (C)(1)(A) Except to the extent that a greater minimum sentence is otherwise provided by this subsection or by any other provision of law, any person who, during and in relation to any crime of violence or drug trafficking crime (including a crime of violence or drug trafficking crime that provides for an enhanced punishment if committed by the use of a deadly weapon or dangerous weapon or device) for which the person may be prosecuted in a court of the United States, uses or carries a firearm, or who, in furtherance of any such crime, possess a firearm, shall, in addition to the punishment provided for such crime of violence or drug trafficking crime . . .
>
> (B) If the firearm possessed by a person convicted of a violation of this subsection-- . . . (ii) is a . . . destructive device, . . . the person shall be sentenced to a term of imprisonment of not less than 30 years.
>
> (3) For purposes of this subsection the term "crime of violence" means an offense that is a felony and —
>
> (A) has as an element the use, attempted use, or threatened use of physical force against the person or property of another.

STATEMENT OF THE CASE

Illinois' attempt offenses have two elements: the intent to commit a specific

offense and a substantial step towards committing the offense. Neither element requires the defendant to use, attempt to use, or threaten to use force. The Seventh Circuit acknowledged all this but went on to hold that an Illinois' attempt offense, where the offense attempted has as an element the use of force, does have as an element the use of force because "[w]hen the intent element of the attempt offense includes intent to commit violence against the person of another, . . ., it makes sense to say that the attempt crime itself includes violence as an element ...." Hill v. United States, 877 F.3d 717, 719 (7th Cir. 2017). That is statutory drafting, not statutory interpretation. This issue has become incredibly important in light of this Court's holding in United States v. Taylor, 142 S. Ct. 2015 (2022), which held that "no element of attempted Hobbs Act robbery required proof that the defendant used, attempted to use, or threatened to use force".

As relevant to this petition, Petitioner was charged with engaging in a pattern of racketeering activity (RICO), in violation of 18 U.S.C. § 1962(c), and using and carrying a firearm, specifically an incendiary device (Molotov cocktail), during and in relation to the RICO charge, in violation of 18 U.S.C. § 924(c). The charges were based on Petitioner's alleged membership in the Bishops, a street gang based primarily in Chicago, Illinois and also, in the Quad Cities (Rock Island, East Moline, Moline, Illinois and Davenport, Iowa).

The RICO count alleged that the Bishops was a RICO enterprise, that Petitioner was associated with the enterprise, and that the enterprise engaged in a pattern of racketeering activity through nine racketeering acts, only six of which applied to Petitioner. One of the six racketeering acts applicable to Petitioner was drug distribution (Marijuana) and the remaning five were attempted Illinois' arsons. The § 924(c) count charged Petitioner with using and carrying a firearm, specifically an incendiary device as defined in 18 U.S.C. § 921(a)(4), during and in relation to the RICO charge. See United States v. Espinoza, No. 00-cr-40031 (2000).

The case proceeded to trial. As to the 924(c) count, the Court determined as a matter of law that the RICO count was a crime of violence as defined in § 924(c)(3). Accordingly, the Court instructed the jury that to find Petitioner guilty of the 924(c) offense, it had to find he "committed the racketeering crime alleged in Count One," that he used or carried a firearm during and in relation to that crime, and that the firearm was a destructive device.

The jury convicted Petitioner of all counts. The court sentenced Petitioner to 240 months of imprisonment on the RICO count and a consecutive 360 months of imprisonment on the § 924(c) count.[1]

Following this Court's decision in Johnson v. United States, 135 S. Ct. 2551 (2015), the United States Court of Appeals for the Seventh Circuit granted Petitioner permission to file a successive motion pursuant to 28 U.S.C. § 2255 to challenge his § 924(c) conviction. Petitioner's motion to vacate argued that under the rule announced in Johnson, 18 U.S.C. § 924(c)(3)(B) was unconstitutionally vague. Petitioner then argued that because his RICO conviction did not have as an element the use, attempted use or threatened use of physical force against the person or property of another it was not a crime of violence as defined in § 924(c)(3)(A), therefore, it could not support his § 924(c) conviction. Petitioner argued that even if a court is allowed to look at the specific racketeering acts supporting the RICO conviction under the modified categorical approach, the attempted arson racketeering acts did not involve the use, attempted use or threatened use of force because Illinois' attempt statute only requires an intent to commit an offense and a substantial step towards the commission of the offense and the substatntial step requirement, as interpreted by the Illinois Supreme Court, did

[1] Petitioner was also convicted of RICO conspiracy, being a felon in possession of a firearm, conspiracy to distribute marijuana. The sentences on all those counts ran concurrently with the 240 month RICO sentence.

not require even the attempted use of force. 720 ILCS 5/8-4(a) (Attempt).

The district court found the RICO statute divisible, allowing it to use the modified categorical approach to examine the racketeering acts supporting the RICO conviction to determine whether those acts had as an element the use of force. The district court then concluded that an Illinois attempted arson conviction had such an element. See Espinoza v. United States, No. 16-cv-4145, 2017 U.S. Dist. LEXIS 163347 at 26 (C.D. Ill. 2017).

Petitioner appealed the district court's order and the day after he filed his reply brief, the Seventh Circuit issued its opinion in Hill v. United States, 877 F.3d 717 (7th Cir. 2017). Hill holds "[w]hen a substantive offense would be a violent felony under [18 U.S.C.] § 924(e) and similar statutes, an attempt to commit that offense also is a violent felony." Hill 877 F.3d at 719. Hill, which also dealt with an Illinois attempt conviction, concedes that Illinois attempt offenses have only two elements, intent to commit an offense and a substantial step towards commission of the offense. Hill v. United States, 877 F.3d 717, 718 (7th Cir. 2017). Hill also concedes that neither of those elements necessarily requires even the attempted use of force. Id. Despite these admissions, Hill found Illinois' attempts to commit crimes of violence are crimes of violence because "[w]hen the intent element of the attempt offense includes intent to commit violence against the person of another, ..., it makes sense to say that the attempt crime itself includes violence as an element....." Hill v. United States, 877 F.3d 717, 719 (7th Cir. 2017). The Seventh Circuit applied Hill to Petitioner's case, stating in toto "[t]he judgment is affirmed on the authority of Hill v. United States, 877 F.3d 717 (7th Cir. 2017)." See Espinoza v. United States, 710 Fed.Appx. 267 (7th Cir. 2018).

This Court denied certiorari on October 1, 2018.

On June 21, 2022, this Court in Taylor, held that "no element of Attempted Hobbs Act robbery required proof that the defendant used, attempted to use, or

threatened use of force." United States v. Taylor, 142 S. Ct. 2015 (2022).

On October 12, 2022, Petitioner filed a Writ of Habeas Corpus, Pursuant to Title 28 U.S.C. § 2241(c)(3), due to the new intervening change in statutory interpretation in Taylor. The two attempt elements at issue in Taylor are the exact same two attempt elements at issue in this petition as well as Petitioner's Recall the Mandate and his authorized § 2255 motion, all relevant to this petition.

The government was ordered to respond to Petitioner's § 2241 petition and Petitioner timely replied to the government's response. While Petitioner was waiting on a decision from the district court, this Court decided Jones v. Hendrix, 599 U.S. 465 (2023). On June 27, 2023, the district court denied Petitioner's § 2241 petition in light of Jones v. Hendrix. See Espinoza v. Warden, F.C.I. Pekin, No. 22-1352 (C.D. Ill. 2023). Petitioner timely filed an appeal to the Court of Appeals for the Seventh Circuit. On November 17, 2023, Petitioner's appeal was denied by the Seventh Circuit, also, in light of Jones v. Hendrix. See Espinoza v. Michael Segal, Warden, No. 23-2396 (7th Cir. 2023).

On December 28, 2023, Petitioner filed a Motion to Recall the Mandate of his authorized successive § 2255 motion in light of intervening change in statutory interpretation in this Court's decision in United States v. Taylor, 142 S. Ct. 2015 (2022). On January 4, 2024, the Court of Appeals for the Seventh Circuit denied Petitioner's Motion to Recall the Mandate. (Pet. App. 1a). A petition for rehearing and petition for rehearing en banc was supposedly returned back to Petitioner unfiled because the Clerk of the Court for the Seventh Circuit claimed that the case was closed. Petitioner never recieved the returned document.

The Illinois statutes involved are: 720 ILCS 5/20-1 (Arson); 720 ILCS 5/20-1.2 (Residential Arson); and 720 ILCS 5/8-4(a) (Attempt). The "Attempt" langauge was attached to both of the Illinois' Arson statutes. See United States v. Espinoza, No. 4:00-cr-40031-JBM (C.D. Ill. 2000).

REASONS FOR GRANTING THE WRIT

With this Court's invalidation of 18 U.S.C. § 924(c)(3)(B), the question of whether an Illinois' attempt offense still qualifies as a crime of violence is critically important. Prior to Davis (2019) and Taylor (2022), this issue was not ctical as attempt offenses could qualify as crimes of violence under § 924 (c)(3)(B)'s residual clause and similar statutes. See James v. United States, 550 U.S. 192 (2007)(attempted burglary violent felony under ACCA's residual clause), overruled by Johnson v. United States, 135 S. Ct. 2551 (2015); United States v. Keelan, 786 F.3d 865, 871 n.7 (11th Cir. 2015)(attempt conviction was crime of violence under § 16(b). Johnson and Dimaya wrought a sea change. Now attempt convictions can only be crimes of violence if they have as an element the use, attempted use, or threatened use of physical force. This issue is vitally important in § 924(c) cases because there is a split in the circuits as to the Taylor (2022) decision concerning attempt convictions.

In the Eastern District of North Carolina, the government concedes that arson and attempted arson are not valid predicate crimes of violence for § 924(c) purposes. Bullis v. United States, No. 5:16-cv-628-FL., 2022 U.S. Dist. LEXIS 167207 at 7 (Sept. 16, 2022). The Seventh Circuit's contrary holding was a willful act of statutory drafting to obtain a desired result rather than an exercise in statutory interpretation. This Court, not long ago, rejected the Ninth Circuit's similar attempts at legislating, Jennings v. Rodriguez, 138 S. Ct. 830 (2018), and should do the same here.

In Hill, the Seventh Circuit acknowledged that Illinois' attempt offenses do not have as an element even the attempted use of force, that should have been the end of the analysis. Rather than accept this straightforward conclusion, Hill, in effect, amended the language of § 924(c)(3)(A) to read "has as an element the

use, attempted use, threatened use, or intended use of physical force against the person of another." That is statutory drafting, not interpreting.

A. THERE IS A SPLIT IN THE CIRCUITS CONCERNING THIS COURT'S DECISION IN TAYLOR AND WHETHER AN ATTEMPT IS A CRIME OF VIOLENCE

This Court in Taylor, held that, "the two attempt elements of an intent to commit a specific offense and commission of an act which constitutes a substantial step toward the commission of that offense does not have as an element the use, attempted use, or threatened use of force against another person or his property." United States v. Taylor, 142 S. Ct. 2015, 2020 (2022).

After this Court decided Taylor, the Court of Appeals for the Seventh Circuit, decided United States v. States, No. 22-1477, 2023 U.S. App. LEXIS 16934 (July 5, 2023). In States, the parties disputed how broadly this Court's decision in Taylor (2022) applied. The government contended that Taylor's holding that an attempt is not a crime of violence is limited to attempts to commit offenses like Hobbs Act robbery - that can be completed without the use of actual force. United States v. States, No. 22-1477, 2023 U.S. App. LEXIS 16934 at 11 (July 5, 2023). Under this interpretation, two other circuits have considered this issue. They held that Taylor leaves open the possibility that an attempt to commit an offense that requires the use of force may be a crime of violence. Id. at 11, quoting Alvarado-Linares v. United States, 44 F.4th 1334, 1346-47 (11th Cir. 2022); United States v. Martin, No. 22-5278, 2023 U.S. App. LEXIS 8067, 2023 WL 2755656, at *5-7 (6th Cir. Apr. 3, 2023).

In States, the Seventh Circuit resorted back to their decision in Hill v. United States and this Court's decision in Taylor (2022), and Taylor's impact on Hill. The Seventh Circuit held that "Because Taylor's substantial step analysis

focused on that element alone, it does not undermine Hill's conclusion that 'an attempt constitutes an attempt to commit each element of the substantive offense or the reason underlying it. The interaction of the intent and substantial step elements was central to Hill's attempt analysis.'" United States v. States, No. 22-1477, 2023 U.S. App. LEXIS 16934 at 20-21 (July 5, 2023)(quoting Morris, 827 F.3d at 698-99)(Hamilton, J., concurring).

The Seventh Circuit in States, went on to hold that "Taylor abrogates Hill only to the extent that Hill reasoned that [w]hen a substantive offense would be a [crime of violence]. . ., an attempt to commit that offense also is a [crime of violence]. Its separate conclusion that an attempt to commit a crime should be treated as an attempt to commit every element of that crime, is consistent with Taylor and remains good law." Unites States v. States, No. 22-1477, 2023 U.S. App. LEXIS 16934 at 21 (July 5, 2023).

The Seventh Circuit is wrong on Illinois' law. In States, the Seventh Circuit held that "when the government must prove the defendant intended to commit each element of the completed offense, we treat the attempt conviction as an attempt to commit each element of the completed offense." United States v. States, No. 22-1477, 2023 U.S. App. LEXIS 16934 at 22 (July 5, 2023)(quoting Hill v. United States, 877 F.3d 717, 719 (7th Cir. 2017). This argument is based upon an incorrect legal premise. In fact, jurrors in Illinois are not even instructed on the elements of the offense a defendant is charged with attempting to commit. Hill's holding rests on the false premise that "conviction of attempt requires proof of intent to commit all elements of the completed crime." Hill, F.3d at 719; see also, Illinois Pattern Jury Instructions - Criminal, No. 6.05 (available at http://www.illinoiscourts.gov/CircuitCourt/CriminalJuryInstructions/CRIM_06.00.pdf.). A jury cannot possible find an intent to commit elements it has no idea exist.

In Bullis, the defendant's unnderlying § 924(c) predicate crimes of violence were arson, attempted arson, and mailing a nonmailable matter. Bullis v. United States, 2022 U.S. Dist. LEXIS 167207 at 6 (E.D. NC. Sept. 11, 2022). The government in Bullis conceded that Bullis' underlying § 924(c) predicates, arson and attempted arson no longer qualify as a crime of violence under the force clause. Id. at 6-7. This contradicts the Seventh Circuit's holding in Hill. How can the government take two different positions on the same issue? This is a split in the circuits. Given the critical importance of this issue, this Court should step in and prevent this error from spreading even further then it already has.

Most States and Federal arson statutes fail to be a crime of violence because they define arson to include the destruction of one's own property. See Torres v. Lynch, 136 S. Ct. 1619, 1629-30 (2016). And now, attempted arsons are failing to be a crime of violence because many of those statutes only elements are "an intent to commit an offense and a substantial step towards commission of the offense." Neither of those elements involve the use, attempted use, or threatened use of physical force against the person or property of another. See United States v. Taylor, 142 S. Ct. 2015, 2020 (2022).

B. HILL ADMIST THAT ATTEMPT OFFENSES DO NOT HAVE AS AN ELEMENT THE USE, ATTEMPTED USE, OR THREATENED USE OF FORCE

Hill concedes as it must, that Illinois attempt offenses have only two elements, intent to commit an offense and a substantial step towards commission of the offense. Hill v. United States, 877 F.3d 717, 718 (7th Cir. 2017). Hill then concedes, as it must, that neither element necessarily requires even the attempted use of force. Id. For example, Hill noted that "one could be convicted of attempted murder for planning the assassination of a public official and buying a rifle to be used in that endeavor. Buying a weapon does not itself use, attempt, or

threatened physical force; neither does drawing up assassination plans." Hill v. United States, 877 F.3d 717, 718 (7th Cir. 2017). That should of been the end of the opinion. Following Davis, an offense can only be a crime of violence for § 924(c) purposes, if it has as an element the use, attempted use, or threatened use of physical force against the person or property of another. Since Hill admits Illinois attempt offenses have no such element, by the plain language of the statutes, Illinois attempt offenses are not crimes of violence. End of analysis.

Rather than relying on the actual language of § 924(c)(3)(A), Hill purports to discern what Congress really intended § 924(c)(3)(A) to cover and then holds that attempts to commit offenses that have as an element the use of force fall within Congress' unstated intent. As Hill put it, "[w]hen the intent element of the attempt offense includes intent to commit violence against the person of another, ..., it makes sense to say that the attempt crime itself includes violence as an element....." Hill v. United States, 877 F.3d 717, 719 (7th Cir. 2017). But what does or does not "make sense" to a particular tribunal is irrelevant when interpreting plain, unambiguous statutory language. Section 924(c)(3)(A) states an offense is a crime of violence if it has as an element the actual use of force, the attempted use of force, or the threatened use of force. The statute does not include offenses that have as an element the intent to use force.

This Court has time and again told inferior courts to apply the plain language of statutes. "The preeminent canon of statutory interpretation requires [this Court] to 'presume that [the] legislature says in a statute what it means and means in a statute what it says there.'" BedRoc Ltd., LLC v. United States, 541 U.S. 176, 183 (2004). A court's "inquiry begins with the statutory text, and ends there as well if the text is unambiguous." Id. This Court should intervene and stop this erroneous line of cases before it gets further out of control. Section 924(c)(3)(A) is a statute that is unambiguous.

C. **HILL FAILS ON ITS OWN TERMS**

Hill rests its holding on Judge Hamilton's concurrence in Morris v. United States, 827 F.3d 696, 698-99 (7th Cir. 2016). There, Judge Hamilton contended:

> As a matter of statutory interpretation, an attempt to commit a crime should be treated as an attempt to carry out acts that satisfy each element of the completed crime. That's what is required, after all, to prove an attempt offense. If the completed crime has as an element the actual use, attempted use, or threatened use of physical force against the person or property of another, then attempt to commit the crime necessarily includes an attempt to use or to threaten use of physical force against the person or property of another.

Morris, 827 F.3d at 698-699. This argument is based upon an incorrect legal premise. There is no requirement in Illinois law, or federal for that matter, that the defendant attempt to carry out acts that satisfy each element of the completed offense. All that must be proven is an intent to commit an offense and a substantial step towards commission of the offense. United States v. Villegas, 655 F.3d 662, 668-69 (7th Cir. 2011); United States v. Bailey, 227 F.3d 792, 797 (7th Cir. 2000); United States v. Dennis, 115 F.3d 524 (7th Cir. 1997).

In fact, jurrors in Illinois are not even instructed on the elements of the offense a defendant is charged with attempting to commit. Illinois Pattern Jury Instructions-Criminal, No. 6.05 (available at http://www.illinoiscourts.gov/CircuitCourt/CriminalJuryInstructions/CRIM_06.00.pdf). A jury cannot possibly find an intent to commit elements it has no idea exist.

"Elements are the constituent parts of a crime's legal definition - the things the prosecution must prove to sustain a conviction. At a trial, they are what the jury must find beyond a reasonable doubt to convict the defendant, and at a plea hearing, they are what the defendant necessarily admits when he pleads guilty." Mathis v. United States, 136 S. Ct. 2243, 2248 (2016). An intent to commit each element of the offense attempted is not an element of attempt offenses. Hill's holding rests on the false premise that "conviction of attempt requires proof of

intent to commit all elements of the completed crime." Hill v. United States, 877 F.3d 717, 719 (7th Cir. 2017).

D. HILL'S CLAIM THAT OTHER CIRCUITS HAVE HELD ATTEMPTS TO COMMIT VIOLENT FELONIES ARE THESELVES VIOLENT FELONIES UNDER THE ELEMENTS CLAUSE IS WRONG

Hill cites three cases for the proposition that three other circuits have held attempt offenses are violent felonies "under the elements clauses of § 924(e) and similar federal recidivist laws, such as 18 U.S.C. § 16 and 18 U.S.C. 924(c)." Hill, 877 F.3d at 718. None of the cited cases support that claim. United States v. Fogg, 836 F.3d 951 (8th Cir. 2016), does not even involve an attempt offense. United States v. Mansur, 375 Fed.Appx. 458 (6th Cir. 2010), states in dicta that an attempted Ohio robbery conviction could be a violent felony under § 924(e) but goes on to hold the conviction was a violent felony under the residual clause. Additionally, the Sixth Circuit, in a subsequent published opinion rejected Mansur's interpretation of the Ohio robbery statute. Finally, United States v. Wade, 458 F.3d 1273 (11th Cir. 2006), which predated Johnson, holds that attempted residential burglary is a violent felony under the residual clause, not the elements clause.

To put it mildly, relying on a case holding attempt convictions are violent felonies under the unconstitutional residual clause to support a holding that attempt offenses have as an element the use, attempted use, or threatened use of physical force against the person of another is not persuasive.

Since Hill was decided the Eleventh Circuit has adopted its reasoning. United States v. Hubert, 883 F.3d 1319 (11th Cir. 2018). Courts interpret statutes, they do not write them. In the end, that is what the Seventh Circuit did here in Hill and in States. Given the critical importance of this issue this Court should step in and prevent this error from spreading even further than it already has.

CONCLUSION

For the foregoing reasons, Petitioner prays that this petition for Writ of certiorari should be granted.

Respectfully submitted,

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