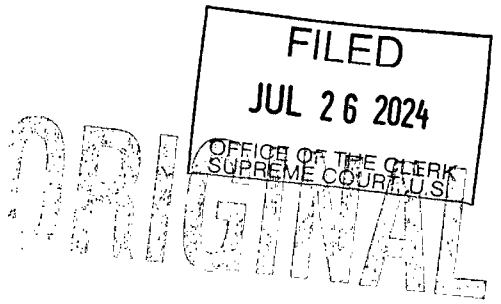
No. 24-5365

IN THE SUPREME COURT OF THE UNITED STATES

Troy Steven Richter
Petitioner

V

United States of America
Respondent



ON PETITION FOR WRIT OF CERTIORARI
TO

UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT

Petition For Writ Of Certiorari

Troy Steven Richter
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FCI Marion
P.O. Box 1000
Marion, Illinois 62959

Questions Presented

1. Does the First Amendment and protection of free speech prohibit the initiation of a criminal investigation when original materials were deemed as erotica and did not violate criminal statutes?

2. Does the Fourth Amendment guarantee protections of an individual's confiscated items pera search warrant and include notification of items seized when no property interest was relinquished?

3. Is a defense attorney's assistance ineffective under the Sixth Amendment and Strickland if they initially review the evidence in a criminal case 4 months after advising a criminal defendant client to plead guilty and has secured the guilty plea in court, which would invalidate the knowing and voluntariness portion of a plea?

4. Does an Attorney advising the Court his client's images meet the definition of CP harm and waive his client's ability to challenge the images under the First Amendment and does it constitute Ineffectice Assistance of Counsel?

5. Since issuance of a Certificate of Appealability is not to be based upon the merits presented, what is the threshold of "reasonable jurist", whether it means one jurist, a majority, or a unanimous jury, where convincing one jurist would be a lower threshold?

List Of Parties

All parties appear in the caption of the case on the cover page.

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IN THE SUPREME COURT OF THE UNITED STATES
PETITIONER FOR WRIT OF CERTIORARI

The Petitioner respectfully prays that a writ of certiorari be issued to review the following judgements:

Opinions Below

The Opinion of the Seventh Circuit Court of Appeals appears at Appendix "A" to the petition and is unknown whether it was published.

The Opinion of the United States District Court of Southern District Of Indiana appears Appendix "B" of the petition and it is unknown if it was published.

JURISDICTION

The date on which the Seventh Circuit Court of Appeals decided my case was March 5, 2024. A timely petition for a rehearing was denied by the Seventh Circuit Court of Appeals on May 17, 2024, and a copy of the order denying rehearing appears at Appendix "C".

CONSTITUTIONAL AND STATUTORY AMENDMENTS INVOLVED

United States Constitution

I Amendment
IV Amendment
V Amendment
VI Amendment

United States Code (U.S.C.)

18 U.S.C.

§ 2256(8)
§ 2252(a)(4)
§ 2256(2)(B)(iii)

28 U.S.C.

§ 2253

Statement of the Case

On September 20, 2017 Troy Steven Richter was arrested by Homeland Security. On June 12, 2018, he was charged in a five count indictment for violation of 18 U.S.C. § 2423(b)(Count 1); 18 U.S.C. § 2251(a)(Counts 2-4); and 18 U.S.C. § 2252A(a)(5)(B)(Count 5). He was appointed Counsel, and on April 22, 2019 filed a petition to enter a plea of guilty agreeing to plead guilty as charged.

On August 21, the Court held a change of plea and sentencing hearing and accepted the plea agreement. Defense Counsel requested a sentence of 18 years, and the United States requested a sentence of 30 years. The Court sentenced Richter to 360 months imprisonment on Counts 1-4, and 240 months imprisonment for Count 5. Final judgement was entered on August 22, 2019.

On September 5, 2019, Richter filed notice of appeal, challenging only the length of his sentence. Shortly after, counsel filed the appellate brief, and it was dismissed by the Seventh Circuit.

On May 21, 2021, Richter filed a Motion to Vacate under 28 U.S.C. § 2255. Richter's IAC was denied on May 22, 2023, along with COA.

Richter appealed denial of his § 2255, and Appeal was denied on March 11, 2024. Richter filed Motion for Rehearing/En Banc, and it was denied on April 30, 2024.

Reasons For Granting the Writ

I. Ineffective Assistance of Counsel For Failing to Protect Petitioner's First Amendment Rights by Not Challenging Search Warrant and Evidence Obtained

The Petitioner had a First Amendment Right to his online postings, no matter the general view of such, of legal child erotica. This right was initially violated when Special Agent Michael Johnson with the Department of Homeland Security Investigation, (HSI) when he submitted an "Affidavit in Support of Search Warrants" on September 20, 2017 for content found under the Petitioner's online account. This material was found to be legal child erotica, even admitted to be by the United States Attorney. There was no basis for a search warrant to issue.

Neither the Petitioner's posting of LEGAL child erotica, nor his comments surrounding such, established probable cause that the Petitioner possessed illegal materials, including child pornography in his home.

"Government regulation of speech is content based if a law applies to particular speech because of topic discussed or the idea or message expressed." Reed v Town of Gilbert, 135 S.Ct. 2218, 2227 (2015); Content based restrictions are considered a most serious infringement of First Amendment liberties, since the government is using the force of law to distort public discourse by suppressing, through either prior restraint or subsequent punishment, those messages perceived by the government to be somehow objectionable.

In this current case before you, in the government's Memorandum in Opposition to Troy Richter's 28 U.S.C. § 2255 Motion, in the government's Memorandum in Opposition to Troy Richter's 28 U.S.C. § 2255 Motion, in the District Court for the S.D. Of Indiana, page 8,

¶ 4, it states:

> "THE COURT: Legal?"
> "MR. DEBROTA: Legal, no question;"

And further, on page 19, ¶ 3, it states:

> "And Richter's argument that the government conceded at 'Richter's sentencing hearing that the images he posted online were legal child erotica' is taken out of context. Instead when responding to the court's question, the government explained that Richter's public postings were legal child erotica - but they indicated criminal activity afoot."

In the "Application for a Search Warrant", (Case No. 1:17-MJ-821) issued in the U.S. District Court for the S.D. of Indiana, HSI Special Agent Michael Johnson explained the difference, in his official opinion, between "child erotica" and "child pornography". (Affidavit For Search Warrant, pg. 6, Item 12-13);

Item 12 states:

> "'Child erotica' as used herein, means materials or items that are sexually arousing to persons having a sexual interest in minors but that are not necessarily obscene or do not necessarily depict minors in sexually explicit poses or positions."

Item 13 states:

> "'Child pornography', as defined by 18 U.S.C. § 2256(8), is any visual depiction of sexually explicit conduct where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is iundistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct."

The image described in the Affidavit (pg. 22, item 55), which was used to obtain the search warrant, states the image shows the bare breast of a nine year old girl. In the government's own admission at sentencing, the image was LEGAL child erotica. It may not have been agreeable to everyone, but it was protected under the First Amendment of the United States Constitution.

The First Amendment is as follows:

> "Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peacably to assemble, and to petition the Government for a redress of grievances."

The Seventh Circuit has addressed this issue before. See: United States v Griesbach, 540 F.3d 654 (2008)(finding that "18 U.S.C. §§ 2252(a)(4), § 2256(2)(B)(iii) criminalizes possession of images depicting a minor in sexually explicit conduct, defined to include 'lascivious exhibition of the genitals or pubic area.' Under the federal law as under Wisconsin law, more than nudity is required to make an image lascivious; the focus of the image must be on the genitals or the image must be otherwise sexually suggestive.");

At no time did the government state that the Petitioner posted any images that fit the above definition. There were no images of a sexually explicit nature, nor were there any images of genitalia. As the government stated, the images are purely legal child erotica.

The government overstepped their bounds when applying for a search warrant based on legal postings. The officer came to conclusions in which he had no knowledge to make and did not present proper probable cause to obtain the warrant. This resulted in a violation of the Petitioner's Fourth Amendment Right of the United States Constitution, which states:

> "The right of the people to be secure in ther persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrant shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the person or things to be seized."

Through the postings used, there was simply no evidence of any

criminal activity whether or not another person would agree with the subject matter. It was protected by the Fourth Amendment.

This leads to a violation under the Fifth Amendment that promises Due Process. The Petitioner was never afforded the opportunity to challenge the legality of the original images due to the ineffectiveness of his court appointed attorney. This in fact points to another Constitutional right being violated. The Sixth Amendment. Counsel should have protected the Petitioner's First Amendment which were violated by the government intruding into the personal effects of the Petitioner after posting legal materials online.

It is not beyond belief that in today's day and age that a reasonable jurist would find the District Court's denial debatable and that incursions into private lives of citizens by police due to legal online activities, including those that could be considered risque or detestable, unreasonable. The Framers meant to prevent this kind of intrusion when the Constitution was written.

A reasonable jurist could find that the government violated the Petitioner's First Amendment, Fourth Amendment, Fifth Amendment and Sixth Amendment rights.

A reasonable jurist could question the lack of counsel to protect these rights to be unreasonable and a violatoin of the Sixth Amendment.

Evidence Used to Obtain Search Warrant
Falls Under Legal Definition of "Child Erotica"
by Both State and Federal Definitions

The search warrant was obtained by Indiana Code Section 35-42-4-4(a)(4)(C), defining "sexual conduct", a component of the definition of child pornography. (See: "Government's Exhibit "A",

United States Memorandum in Opposition to Richter's 28 U.S.C. § 2255 Motion, pg. 22, Item # 55); What was actually posted, the bare breast of a child, does not fit this standard of definition under both State and Federal law.

"[]Mere nudity is not enough to convict[]" Siebenaler v State of Indiana, Court of Appeals of Indiana, Opinion No. 18A-CR-1381, pg. 14, item 29; See also: Osborne v Ohio, 495 U.S. 103, 112 (1990), "depictions of nudity, without more, constitute protected expression."; And: New York v Ferber, 458 U.S. at 765 n. 18 ("[N]udity, without more[,] is protected expression." Id. at 773 (observing expresssions of child nudity could be found in materials "ranging from medical textbooks to pictorials in the National Geographic"); United States v Johnson, 639 F.ed. 433, 439 (8th Cir. 2011)(describing "mere nudity" as "innocent family photos, clinical depictions, or works of art");United States v Wallenfang, 568 F.3d 649, 657 (8th Cir. 2009)(holding that "[n]udity alone" does not satisfy the definition of "lascivious exhibition of the genitals" (one of the definitions of "sexually explicit conduct" under federal law) and explaining that a photograph is "lascivious" only if it is "sexual in nature" (quotations omitted)); United States v Griesbach, 540 F.3d 654, 656 (7th Cir. 2008)("[M]ore than mere nudity is required to make an image lascivious; the focus of the image must be on the genitals or the image must be otherwise sexually suggestive.");

In the Affidavit for the Search Warrant, it states: "[]this image showing the breast of a minor girl would constitute 'sexual conduct' under the law of the State of Indiana[]", however, as

Siebenaler demonstrates, this runs contrary to both State and Federal law. The image used to obtain the search warrant was defined as legal "child erotica", and is not enough under both State and Federal law for a search warrant.

For the reasons stated herein, Petitioner's court appointed counsel failed to provide effective assistance by not protecting the Petitioner's First Amendment right to erotica. It was even admitted by the US Attorney that the images in question were legal "no question". Both prongs of Strickland are met since counsel failed to meet what a similarly situated attorney would have done, and was prejudiced by being punished for legal postings, no matter if the public view would find the images obscene.

II. Ineffective Assistance of Counsel for Failing to Challenge Lack of Return or Inventory List

Counsel, Mr. Martin, for the Appellant provided ineffective assistance of counsel by failing to investigate the lack of a search warrant return or inventory list. This constitutes a constitutional issue that a reasonable jurist would find debatable as to if the duties and responsibilities of counsel required these actions in a criminal case.

A reasonable jurist would consider the fact that counsel did not investigate the flaws associated with the search warrant procedures as debatable when if taken as a whole, failing to pursue any challenge to the government's inability to produce either of these items would be indicative of negligence on behalf of law enforcement.

Under 41(f) (1)(B) of the Federal Rules of Criminal Procedure, "An officer present during the execution of the warrant must prepare and verify an inventory of any property seized."

On May 18, 2018, the petitioner wrote his attorney and requested information regarding his search warrant and affidavit, as well as an inventory list of items seized from him residence. This request was basically ignored. He wrote again on October 10, 2018, requesting the same thing, a "copy of inventory or items confiscated from [his] residence/person". This request again went unheeded.

On December 20, 2018, he pointed out to his Counsel that he still had not received an inventory list of items seized, and whether there was any additional evidence in his case. Again, this was never answered by his Counsel and the request was ignored.

On April 1, 2020 the U.S. District Court for the Southern

District of Indiana entered an Order in response to a Motion filed by the petitioner for the return of an inventory list of items seized. The Order directed the government "to serve and file no later than April 28, 2020, a response to Richter's requestr for a copy of the inventory seized pursuant to the search and/or arrest warrant or warrants in this case". (Doc. 72, pg. 2);

The government's response was a hastily compiled list of possible items, none of which contained identification numbers, serial numbers, or a detailed description. The government went on to state: "During discovery in the case, the government provided Defense Counsel with a disk on July 3, 2018 containing the Search Warrants/ Applications for Search Warrants for the residence and the Defendant's person. It also included a different search warrant for email." (Doc. 74, pg. 2); Contrary to the government's implications, a return to these search warrants was never provided to the defense.

The government stated certain items were administratively forfeited and destroyed, but due to the ambiguous nature of the "inventory list" served and filed by the government, it's not possible for the petitioner to determine whether these items were the only items seized by the government, since a proper reciept was never left with the petitioner or his family when the search warrant was executed. That being said, it's not possible to determine if those items destroyed constituted the entire inventory of items seized at the time of his arrest.

The governmet seemed to dismiss this fact as trivial, stating simply that "Ultimately, the Defendant pled guilty."

If Defense Counsel had properly investigated the lack of both the Search Warrant return, and a properly prepared inventory list,

it would have undoubtedly influenced the petitioner's decision to plead guilty. This failure would constitute a constitutional issue that a reasonable jurist would have found debatable as to the responsibilities of a defense attorney to his client.

III
The Seventh Circuit Court of Appeals Erred by not Issuing a Certificate Of Appealability

The Seventh Circuit Court of Appeals erred by not issuing a Certificate of Appealability when the Peitioner has claims of ineffective asisstance of counsel for failing to review evidence prior to the Petitioner signing his plea agreement.

As per Counsel's advice, the Petitioner entered a plea of guilty on April 22, 2019 and sentencing was held on August 22, 2019.

In 2023, roughly four years later, and after several months of litigation, he recieved a partial copy of his Attorney case file. With papers he recieved, was a letter to his Attorney regarding a review of the evidence against him, as per Federal Rules of Criminal Procedure 16. According to the United States Attorney's Office, a disc was produced containing the relevant evidence used against the Petitioner. This letter was dated July 3, 2018.

Along with this letter from the United States Attorney's Office, there was a printout of an email between the Petitioner's Public Defender and Steven D. Debrota of the United States Attorney's Office. In this letter, Dominic Martin, Counsel for the Petitioner stated:

> "Steve, I have been looking through my notes in this case and I don't see any indication that I reviewed the images he produced. Is there a time next week that I can stop and look at them? Thanks."

This email is dated August 9, 2019, almost 4 months after the Petitioner took his advice and entered a plea of guilty. Counsel had almost a year to review the evidence, and make a ten minute determination of its legality. (Exhibit "A")

In the United States Supreme Court case Buck v Davis, 580 U.S. 100, 137 S.Ct. 759 (2017), the High Court held that the Fifth Circuit exceeded the limited scope of the C.O.A. analysis. The C.O.A. statute sets forth a two-step proces: an initial determination whether a claim is reasonably debatable, and then if it is, an appeal in the normal course.

Chief Justice Roberts, writing for the Court, held that the Certificate of Appealability "'inquiry' as we have emphasized, is not coextensive with a merits analysis." According to the Chief Justice, "The question for the Fifth Circuit was not whether Buck had shown extraordinary circumstances. Those are ultimate merits determinations the panel should not have reached. We reiterate what we have said before: a court of appeals should limit its examination at the C.O.A. stage to a threshold inquiry into the underlying merit of [the] claim and ask only if the District Court's decision was debatable."

Under the Antiterroism and effective Death Penalty Act (AEDPA), a petitioner must obtain a Certificate of Appealability before he can appeal the Court's decision. 28 U.S.C. § 2253(c)(1). A C.O.A. will only be granted if the petitioner makes "a substantial showing of the denial of a constitutional right." 28 U.S.C. § 2253(c)(2).

By failing to view the images used to obtain the search warrant, and make a determination as to their legality, and by filing a sentencing memorandum in support of the Presentence Report (PSR) claiming that he had viewed them, constitutes a "substantial showing of the denial of [his] constitutional right."

IV Counsel Violated Defendant's Right and Caused Harm by Exceeding His Authority by Waiving Defendant's Right to Challenge Images Under the First Amendment

From the beginning the Defendant has declared that the images that initiate the entire case were of legal child erotica. Whether or not this type of image agrees to the masses, it does not violate any state or federal laws when posted onto websites. Even in court the United States Attorney put forth an answer stating that the images themselves were indeed legal.

As stated in Ground Five, the Defendant had a First Amendment right to post the images he did. They did not violate law. When law enforcement took an interest in the images and concluded that a warrant must issue to search for images that do violate the law, they tread upon the First Amendment right that the Framers put into place.

On August 14, 2019 Dominic D. Martin of the Indiana Federal Community Defenders, Inc filed the Defendant's Sentencing Memorandum. On page 1, ¶ 2, counsel states:

> "First, the twelve (12) images that Troy produced do meet the definition of sexually explicit conduct."

Counsel at no time discussed this issue with the Defendant. As stated above, the Defendant declared that the images were of legal child erotica. Counsel countered that assertion without consulting with the Defendant by filing this statement in the memorandum.

At multiple times the Defendant sought to have counsel file for a motion to suppress specifically upon these reasons.

The Defendant has maintained records throughout his entire ordeal from arrest. This includes letters he sent to his counsel before he pled guilty or was sentenced.

The letters (Exhibit "D") state that the Defendant did request from his counsel to file a motion for a Franks hearing. Counsel never responded to this request.

The Defendant consistently asked for confiscation forms since he had never been notified of what items had been seized by law enforcement. To this day this question has yet to be answered.

The Defendant showed early on he had concerns that the images used against him were not in violation of state or federal law. Counsel never addressed this concern, and wrote the Memorandum admitting to violations without consulting the Defendant or receiving permission to do so.

Under the Strickland standard a reasonable attorney in the same situation as Defendant's counsel would have challenged the images once the government conceded to the legality of the images. Counsel failing to do so, and failing to file a motion to suppress harmed the Defendant resulting in conviction and a harsher sentence.

Counsel had no authority to waive the First Amendment right argument.

V

The Threshold of "Reasonable Jurist" Constitutionally Vague and Open to Judge's Interpretation for Issuance of Certificate of Appealability

A Certificate of Appealability may issue "only if the [movant] has made a substantial showing of a denial of a constitutional right" 28 U.S.C. § 2253(c)(2). To obtain a COA under this standard, the applicant must show "that reasonable jurists could debate whether the petition should have been resolved in a different manner or that the issues presented were adequate to deserve encouragement to proceed further". Slack v McDaniel, 529 U.S. 473, 484 (2000).

Accordingly, a movant need not establish that he will win on the merits in order to make the "substantial showing" required to obtain a COA; he need only to demonstrate that the question he raises are debatable among jurists.

In Miller-El, 537 U.S. @ 338 this High Court stated "[W]e do not require petitioner to prove, before the issuance of a COA, that some jurists would grant the petition...Indeed, a claim can be debatable even though every jurist of reason might agree, after the COA has been granted and the case has received full consideration, that petitioner will not prevail".

Under this "debatable among jurist" standard, a question of first impression likely warrants issuance of a COA." See United States v Espinoza-Saenz, 235 F.3d 501, 502 (10th Cir. 2000)

In today's world, the First Amendment far exceeds the expectations of the original Framer's. The wide use of the internet now allows for all individuals to express their thoughts, beliefs and it creates a marketplace of ideas.

Because of the vulnerability on the internet, with threats and harassment being commonplace, a persons right to be heard should be fully protected under the First Amendment.

It is truly believable that a panel of jurists would find the issues covered in Ground one debatable as to if the First Amendment covered the initial postings which led to a questionable search warrant, arrest and conviction of the Petitioner. Even the United States Attorney agreed the initial images were legal. They may not have morally agreed with the content, but they were legal as explained in ground one. So in order to protect the First Amendment protections of everyone, a reasonable jurist would find the issue debatable.

The statute is further vague. When it states it must be debatable by reasonable jurists, does that mean that one random jurist would have to find the issue debatable, or is it a majority of a jury panel, or does it indeed have to be debatable among an entire impaneled jury?

Under the new Supreme Court case law Erlinger v United States, NO 23-370 (June 21, 2024) is it allowable for a Judge to make a determination that has so often been said to belong to a jurist? The power of the judiciary and an impaneled jury constitute two very different limitations. A Judge is not constitutionally able to come to a conclusion that is set forth for a jury to decide.

Today's society can be led to believe almost anything is debatable. Take for example the political spectrum. Donald Trump has sold millions of people on the idea that the 2020 election

was stolen. this is without a factual basis and even criminal charges have come about concerning aspects of the issue.

It is almost impossible to determine what a jurist, especially a "reasonable jurist" would find debatable. the threshold questioon as to a constitutional issue has been proven and the Petition is entitled to a Certificate of Appealability.

Conclusion

1. Neither the petitioner's posting of legal child erotica, nor his comments surrounding such, established probably cause that the Petitioner possessed illegal materials, including child pornography in his home. The image described in the Affidavit (Case No. 1:17-MJ-821, pg. 22, item #55), which was used to obtain the search warrant, states the image shows the bare breast of a nine year old girl. By the government's own admission, the image was LEGAL child erotica. It may not have been agreeable to everyone, but it was protected free speech under the First Amendment. The Seventh Circuit has addressed this issue before, and the government overstepped their bounds when applying for a search warrant based on legal postings. Improper conclusions to present probable cause for the search warrant resulted in a violation of the Petitioner's Fourth Amendment rights.

2. Counsel was ineffective for failing to investigate the lack of a proper inventory list of items seized, making it impossible for the Petitioner to determine whether certain items were the only ones seized by the government. There was never a proper receipt left to the petitioner or his family when the search warrant was executed.

Had defense counsel properly investigated the lack of both the search warrant return and a properly preopared inventory list, it would have undoubtedly iunfluenced the petitioner's decision to plead guilty. This failure constitutes a constitutional issue that a reasonable jurist would have found debatable as to the responsibilities of a defense attorney to his client.

3. As per counsel's advice, the Petitioner entered a plea of guilty in April of 2019. Four months later, defense counsel emailed

the U.S. Attorney requesting that he be given access to view the evidence. stating he had not yet seen it, and proceeded to file a "Sentencing Memoradum" stating that the images produced fit the definition of sexual conduct. The District Court erred by denying issusance of a C.O.A. on this "substantial showing of the denial of [the petitioner's] constitutional right", and runs contrary to the Supreme Court.

4. Counsel was ineffective and violated the Defendant's rights by exceeding his authority by waiving Defendant's right to challenge images under the First Amendment when he filed with the Court stating that the images meet the definition of sexually explicit conduct. this was never discussed with the Defendant and it has caused harm to the Defendant by not preserving his Constitutional rights to Free Speach.

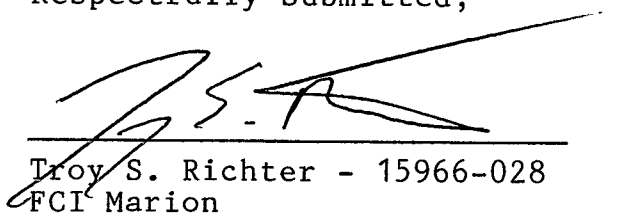
5. The threshold of "reasonable jurist" for issuance of a Certificate of Appealablity is Constitutionally vague and open to a judge's opinion, not a jurist's opinion, for the issuance of a Certificate of Appealability. In today's world the First Amendment means essentially more to the American people than at the time of the Founding. The internet has a vast quantity of items that one may not agree with, but that are protected. There is no logical reasoning as to why a reasonable jurist, or even an entire panel as may be the case, can not decide to protect free speech.

The statute does not describe whether the jurists would be an individual, majority or even a fully impaneled jury.

Prayer for Relief

Wherefore, for the foregoing reasons, the Petitioner PRAYS this Honorable Court will grant Certiorari, or in the alternative, REMAND back to the lower courts in compliance with previous rulings of this Court and issue a Certificate of Appealability.

Respectfully Submitted,



08/15/2024

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