

No. \_\_\_\_\_

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IN THE  
**Supreme Court of the United States**

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*In re* TREY TARELL BRADLEY,  
Petitioner.

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APPENDIX

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TREY TARELL BRADLEY  
of Kansas City, Missouri  
in Washington, D.C.  
parthenianheir@gmail.com

*PRO SE*

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1 (April 6, 2022)

2 THE COURT: All right. State of Missouri v. Trey Bradley, case number  
3 20JO-CR00128-01.

4 May I have your appearances, please?

5 MS. FISSCHER: Joleigh Fischer on behalf of the State of Missouri.

6 MR. ANDERSON: Nate Anderson on behalf of Mr. Bradley, who appears in  
7 person in custody as well.

8 THE COURT: All right.

9 Good morning, Mr. Bradley.

10 THE DEFENDANT: Good morning, Judge. May I start by asking you a  
11 question? I apologize. I know it's probably inappropriate, but I'd like to know if I  
12 can ask you a question before we begin.

13 THE COURT: Well, hold on. Let me first advise you of the reason that  
14 you're in custody today, sir. The Court issued a warrant and set your bond at  
15 \$10,000, cash only, last September, because you were supposed to appear for your  
16 pre-trial conference here in this court. If you recall, your court -- your case was set  
17 for jury trial last October --

18 THE DEFENDANT: Which I requested, yes.

19 THE COURT: Right, you did. And you did not show up for your court date,  
20 so I issued a warrant for you, and that's the reason that you're in custody today.

21 You do have Mr. Anderson still representing you, so I would strongly urge  
22 you to voice all your communications through him, because at this point, anything  
23 that you say is being recorded and --

24 THE DEFENDANT: I understand.

25 THE COURT: -- and it can be used against you.

THE DEFENDANT: And it's on the record, right?

2 THE COURT: It is, indeed.

3 THE DEFENDANT: I would like to say something on the record.

4 THE COURT: Well, that's up to your attorney, sir. You might want to talk  
5 to him first.

6 THE DEFENDANT: I want to know actually --

7 THE COURT: Hold on. I would strongly urge you against saying anything  
8 today, but if you want to talk to your attorney real quick first, I'll let you do that.

9 THE DEFENDANT: I don't want to speak to --

10 THE COURT: Okay. Fine, go ahead.

11 THE DEFENDANT: I actually would like to know is it appropriate to make  
12 a Marsden motion, because I would like to dismiss Mr. Anderson of his duties  
13 representing me, because I believe that he is very heavy-laden, and I don't think that  
14 he's been adequately representing me. And I would like to appear before you, Your  
15 Honor --

16 THE COURT: Who's your new attorney --

17 THE DEFENDANT: -- pro se.

## 18 THE COURT: -- now?

19 THE DEFENDANT: I would like appear before you pro se, if you would  
20 allow me to.

21 THE COURT: Well, I'm not going to allow you to, sir, because you're facing  
22 up to four years in prison just on Count I, and another year in the county jail on  
23 Count II. You're looking up to five years, and you need to be represented by legal  
24 counsel. So --

25 THE DEFENDANT: I have a --



**MISSOURI COURT OF APPEALS  
WESTERN DISTRICT**

STATE OF MISSOURI, )  
 )  
 Respondent, )  
 )  
 v. ) WD85321  
 )  
 TREY TARELL BRADLEY, ) Filed: September 12, 2023  
 )  
 Appellant. )

**APPEAL FROM THE CIRCUIT COURT OF JOHNSON COUNTY  
THE HONORABLE BRENT F. TEICHMAN, JUDGE**

**BEFORE DIVISION FOUR: GARY D. WITT, CHIEF JUDGE, PRESIDING,  
LISA WHITE HARDWICK, JUDGE, AND W. DOUGLAS THOMSON, JUDGE**

**ORDER**

**Per Curiam**

Trey Bradley appeals his convictions after he pled guilty to possession of marijuana and resisting a lawful stop. Upon review of the briefs and the record, we affirm the judgment for reasons explained in a Memorandum provided to the parties.

**AFFIRMED. Rule 30.25(b).**



**MISSOURI COURT OF APPEALS  
WESTERN DISTRICT**

STATE OF MISSOURI, )  
 )  
 Respondent, )  
 )  
 v. ) WD85321  
 )  
 TREY TARELL BRADLEY, ) Filed: September 12, 2023  
 )  
 Appellant. )

**MEMORANDUM SUPPLEMENTING ORDER  
AFFIRMING JUDGMENT PURSUANT TO RULE 84.16(B) OR 30.25(B)**

This memorandum is for the information of the parties and sets forth the reasons for the order affirming the judgment.

**THIS STATEMENT DOES NOT CONSTITUTE A FORMAL OPINION OF THIS COURT. IT IS NOT UNIFORMLY AVAILABLE. IT SHALL NOT BE REPORTED, CITED OR OTHERWISE USED IN UNRELATED CASES BEFORE THIS COURT OR ANY OTHER COURT. IN THE EVENT OF THE FILING OF A MOTION TO REHEAR OR TRANSFER TO THE SUPREME COURT, A COPY OF THE MEMORANDUM SHALL BE ATTACHED TO ANY SUCH MOTION.**

Trey Bradley appeals his convictions after he pled guilty to possession of marijuana and resisting a lawful stop. He contends the circuit court erred in denying, without a hearing, his request to represent himself. Because Bradley waived this claim when he pled guilty, the judgment is affirmed.

### **FACTUAL AND PROCEDURAL HISTORY**

In April 2021, the State charged Bradley with the class E felony of delivery of a controlled substance and the class A misdemeanor of resisting a lawful stop. The information alleged that, on October 20, 2019, in Johnson County, Missouri, Bradley knowingly possessed marijuana with the intent to distribute and fled from a law enforcement officer who was attempting to make a lawful stop of his vehicle.

In June 2021, the court held an arraignment hearing at which Bradley appeared with defense counsel. Bradley represented to the court that he understood the charges and ranges of punishment, waived formal arraignment, and asked the court to enter a plea of not guilty to both charges.

In July 2021, the court held a scheduling conference. Bradley appeared with defense counsel. The case was set for a jury trial on October 29, 2021, with a pretrial conference set for September 28, 2021, to take up a motion to suppress that defense counsel intended to file.

When Bradley failed to appear at the September 28, 2021 pretrial conference, the court issued a warrant for his failure to appear. The October 19, 2021 trial was cancelled. Bradley was arrested in March 2022.

Bradley appeared before the court, in custody and with defense counsel, in early April 2022. During this hearing, Bradley asked the court if it would be "appropriate" to make a "*Marsden*<sup>1</sup> motion:"

[BRADLEY]: I actually would like to know is it appropriate to make a Marsden motion, because I would like to dismiss Mr. Anderson of his duties representing me, because I believe that he is very heavy-laden, and I don't think that he's been adequately representing me. And I would like to appear before you, Your Honor –

THE COURT: Who's your new attorney –

[BRADLEY]: -- pro se.

THE COURT: -- now?

[BRADLEY]: I would like appear before you pro se, if you would allow me to.

THE COURT: Well, I'm not going to allow you to, sir, because you're facing up to four years in prison just on Count I, and another year in the county jail on Count II. You're looking up to five years, and you need to be represented by legal counsel.

The court informed Bradley that defense counsel would be allowed to withdraw when Bradley found another attorney to represent him. The court stated, "[Y]ou're not going to represent yourself on charges like this," and the court gave Bradley "some time to think about it." The court continued the case to a date two weeks later.

Two days after the pretrial hearing, however, Bradley appeared with defense counsel to plead guilty pursuant to a plea agreement. In exchange for Bradley's guilty

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<sup>1</sup> "*Marsden*" refers to a California state court case, *People v. Marsden*, 465 P.2d 44 (Cal. 1970). The case held that, when a defendant seeks to discharge appointed counsel and substitute new counsel, and asserts inadequate representation, the circuit court "must permit the defendant to explain the basis of his contention and to relate specific instances of the attorney's inadequate performance." *People v. Johnson*, 432 P.3d 536, 563 (Cal. 2018) (internal quotation marks omitted) (citing *People v. Vines*, 251 P.3d 943 (Cal. 2011)).

plea, the State amended the information to charge him with the class A misdemeanor, instead of the class E felony, of possession of a controlled substance and the class A misdemeanor of resisting a lawful stop. During the plea hearing, Bradley represented that he understood the charges and ranges of punishment. Bradley informed the court that he asked defense counsel to prepare a motion to suppress, but defense counsel thought it was in his best interest to accept the plea offer. The court inquired about the voluntariness of Bradley's guilty plea:

THE COURT: Here's the deal, sir. You're pleading guilty today because you are, in fact, guilty of these charges, or I'm setting your case for trial on the felony. That's it. I'm not having any more discussions. I'm not having you plead guilty because your lawyer told you to plead guilty. It's not your lawyer's decision whether you plead guilty or not. You're either guilty of these offenses, or are you not guilty, and I'm not going to have you plead guilty to something that you didn't do.

[BRADLEY]: Right.

THE COURT: So if you're telling me that you want to sit here and argue about what your lawyer did or what your lawyer didn't do or what your lawyer told you to do then I'm setting your case for trial. That's it.

[BRADLEY]: I want to plead guilty today.

Bradley told the court he was voluntarily entering his guilty plea because he was, in fact, guilty of the offenses charged:

THE COURT: You're telling me that you're entering a plea of guilty. It's freely given. It's voluntarily given. No one's coerced you. No one's made you plead guilty. You're pleading guilty because you're guilty.

[BRADLEY]: Today, yes, I'm pleading guilty. Yes.

THE COURT: Because you're guilty of these two charges –

[BRADLEY]: Those two charges, yes.

THE COURT: -- that I just read to you?

[BRADLEY]: Yes.

The State recommended a term of 60 days for both counts, suspending execution on the sentences and placing Bradley on supervised probation for two years with special conditions that he repay the Missouri State Highway Patrol Crime Lab \$150, make restitution of \$300 to the Law Enforcement Restitution Fund, and complete 50 hours of community service. Bradley stated that he understood the State's recommendation and still wished to plead guilty.

The court accepted Bradley's guilty pleas after finding that the pleas were knowingly, intelligently, and voluntarily given and that he was guilty of both charges beyond a reasonable doubt. Bradley expressed no concerns about the court pronouncing the sentence pursuant to the plea agreement:

THE COURT: I'm prepared to go ahead and sentence you pursuant to the plea agreement, sir, unless you have some legal reason why I shouldn't do that. Do you know of any other legal reason why I should not go ahead and accept this recommendation and sentence you?

[BRADLEY]: No, not at this moment.

THE COURT: Okay.

In accordance with the State's recommendation, the court sentenced Bradley to 60 days on each count to run concurrently, suspended execution of those sentences, and placed him on two years of supervised probation. The court also mandated that Bradley pay restitution and lab fees and perform community service. Bradley appeals.

THE COURT: -- that I just read to you?

[BRADLEY]: Yes.

The State recommended a term of 60 days for both counts, suspending execution on the sentences and placing Bradley on supervised probation for two years with special conditions that he repay the Missouri State Highway Patrol Crime Lab \$150, make restitution of \$300 to the Law Enforcement Restitution Fund, and complete 50 hours of community service. Bradley stated that he understood the State's recommendation and still wished to plead guilty.

The court accepted Bradley's guilty pleas after finding that the pleas were knowingly, intelligently, and voluntarily given and that he was guilty of both charges beyond a reasonable doubt. Bradley expressed no concerns about the court pronouncing the sentence pursuant to the plea agreement:

THE COURT: I'm prepared to go ahead and sentence you pursuant to the plea agreement, sir, unless you have some legal reason why I shouldn't do that. Do you know of any other legal reason why I should not go ahead and accept this recommendation and sentence you?

[BRADLEY]: No, not at this moment.

THE COURT: Okay.

In accordance with the State's recommendation, the court sentenced Bradley to 60 days on each count to run concurrently, suspended execution of those sentences, and placed him on two years of supervised probation. The court also mandated that Bradley pay restitution and lab fees and perform community service. Bradley appeals.

## ANALYSIS

In his sole point on appeal, Bradley contends the circuit court erred in denying his request to waive counsel and represent himself without holding a hearing or providing "lawfully supported justification at all." Bradley pled guilty to the offenses charged pursuant to a plea agreement instead of proceeding to trial. The State argues that Bradley's voluntary guilty plea waived his right to challenge a pre-plea violation of his constitutional right to self-representation. We agree.

"A plea of guilty voluntarily made with understanding of the nature of the charge is conclusive as to guilt and waives all nonjurisdictional, procedural and constitutional infirmities, if any, in any prior stage of the proceeding." *Geren v. State*, 473 S.W.2d 704, 707 (Mo. banc 1971). Furthermore, "a guilty plea represents a break in the chain of events which has preceded it in the criminal process." *Hampton v. State*, 495 S.W.2d 638, 642 (Mo. banc 1973) (quoting *Tollett v. Henderson*, 411 U.S. 258, 267 (1973)). "When a criminal defendant has solemnly admitted in open court that he is in fact guilty of the offense with which he is charged, he may not thereafter raise independent claims relating to the deprivation of constitutional rights that occurred prior to the entry of the guilty plea." *Id.* "He may only attack the voluntary and intelligent character of the guilty plea by showing that the advice he received from counsel" fell below standards." *Id.*

Bradley makes no argument on appeal that counsel performed below standards. Instead, Bradley asserts that his constitutional claims are not barred by his guilty plea based on the Supreme Court's holding in *Class v. United States*. 138 S. Ct. 798, 804 (2018). In *Class*, the Court held that a valid guilty plea forgoes a fair trial and

accompanying constitutional guarantees, but “they do not include a waiver of the privileges which exist beyond the confines of the trial.” *Id.* at 805 (internal quotation marks omitted) (quoting *Mitchell v. United States*, 526 U.S. 314, 324 (1999)). The defendant in *Class* appealed his conviction, after entering a guilty plea, on grounds that the statute under which he was convicted violated the Constitution. *Id.* at 801-02. Bradley maintains that his guilty plea was involuntary because he could not waive counsel, and that deprived him of his constitutional right prior to and following his guilty plea. Bradley argues that entering his guilty plea with unwanted defense counsel is “a claim which, judged on its face based upon the existing record, would extinguish the government’s power to constitutionally prosecute [Bradley] if the claim were successful.” *Id.* at 806 (internal quotation marks omitted) (quoting *United States v. Broce*, 488 U.S. 563, 575 (1989)).

Bradley misunderstands the substantive and procedural nature of his claim. First, the record shows that Bradley’s request to represent himself was not a definitive waiver of his rights. In the pretrial hearing, Bradley asked the court “is it appropriate to make a Marsden motion, because I would like to dismiss [counsel] of his duties representing me . . . and appear before you, Your Honor, *pro se*.” By merely questioning the court about the propriety of a motion, Bradley did not assert that he fully understood the risks and consequences of waiving his right to counsel and proceeding *pro se*. *Black*, 223 S.W.3d at 152. In the absence of an unequivocal request, “[n]o one deprived him of the right to proceed *pro se*.” *State v. Franklin*, 854 S.W.2d 438, 445 (Mo. App. 1993).

Furthermore, Bradley's claim neither challenges the statutes under which he was charged nor asserts a claim, *e.g.*, double jeopardy, such that the government could not constitutionally prosecute him. *Class*, 138 S. Ct. at 806. The State's power to constitutionally prosecute Bradley for the offenses charged was unaffected by who appeared as counsel for Bradley. Similarly, the circuit court's power to accept Bradley's guilty plea and sentence him was not extinguished by requiring Bradley to think about his request to substitute counsel and represent himself. *Garris v. State*, 389 S.W.3d 648, 651 (Mo. banc 2012). Bradley's claim of error does not fall within the limited exceptions of constitutional claims that may be raised on appeal following a guilty plea. *Class*, 138 S. Ct. at 806.

Without a constitutional claim that qualifies as an exception, Bradley's claim on appeal is disallowed by his guilty plea. The record clearly shows that Bradley's question to the court occurred in a proceeding prior to the entry of his guilty plea. The record also shows that Bradley represented to the court that he was voluntarily entering his guilty plea. Bradley confirmed that he wanted to plead guilty because he was, in fact, guilty of the offenses charged. He expressed that there was no reason the court should not sentence him in accordance with the plea agreement. Bradley's claim that he was denied his constitutional right to self-representation after entering his guilty plea is barred.

*Garris*, 389 S.W.3d at 651. Point denied.

## **CONCLUSION**

**We affirm the judgment of conviction.**

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

TREY TARELL BRADLEY, )  
Plaintiffs, )  
vs. ) Case No. 24-00351-CV-W-GAF  
MIKE PARSON, et al., )  
Defendants. )

**ORDER**

Now before the Court are *pro se* Plaintiff Trey Tarell Bradley's ("Plaintiff") Motion for Order of Contempt and Order to Show Cause (Doc. 21), his Amended Motion for Order of Contempt and Order to Show Cause (Doc. 25), and Defendant Attorney General Andrew Bailey's ("AG Bailey") Motion for Extension of Time to respond to Plaintiff's motion (Doc. 24). Plaintiff asks the Court to hold AG Bailey and the other named defendants—Governor Mike Parson ("Gov. Parson"), Judge Brent Teichman of the Johnson County Circuit Court ("Judge Teichman"), and Denise Welch-Masters ("Welch-Masters")—in contempt for failing to answer his complaint after being served with process, and/or issue an order to show cause. (Docs. 21, 25). AG Bailey is the only defendant who has appeared to date and requests additional time to respond to Plaintiff's motion, or, in the alternative, requests the Court issue the show cause order contemplated in the Order dated June 18, 2024. (Doc. 24).

Before addressing the requests, the Court feels it necessary to explain its handling of Plaintiff's case to this point. Since filing the case, Plaintiff has repeatedly cited statutory provisions that govern the timing of certain order for persons "in custody" seeking 2254 review. However, Plaintiff is not in custody. Therefore, the policy concerns that typically warrant expeditious resolution of 2254 motions are not present here because Plaintiff is not being detained in violation of the Constitution. Consequently, the Court believes, and has believed since the

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

TREY TARELL BRADLEY )  
Petitioner, )  
vs. )  
MIKE PARSON, et al. )  
Respondents. )  
Case No. 24-00351-CV-W-GAF

**MOTION FOR RECONSIDERATION OF ORDER**  
**AND AMENDMENT OF ORDER TO SHOW CAUSE**

COMES, NOW, the petitioner, Trey Tarell Bradley (hereinafter, “Mr. Bradley”), and in support of his above-entitled motion, asserts as follows:

1. On May 17, 2024, the clerk’s office received and filed Mr. Bradley’s *Petition for Writ of Habeas Corpus* (hereinafter, “*Petition*”) pursuant to 28 U.S.C. § 2254.
2. On May 22, 2024, Mr. Bradley submitted his *Motion for Order Fixing a Time for Respondent to File Opposing Suggestions* to be filed pursuant to Local Rule 9.2(h).
3. It is clear that the instruction of Local Rule 9.2(h) for the Court, once assigned a petition, to fix a time for the respondent to file opposing suggestions is congruent with the instruction of 28 U.S.C. § 2243 for a court entertaining a petition for habeas corpus to forthwith issue an order to show cause which is to be returned within three days unless for good cause shown additional time is allowed.
4. Local Rule 9.2(h) and 28 U.S.C. § 2243 provide in relevant portion respectively:  
“Suggestions. Once assigned a petition, the Court must fix a time by which the respondent must file suggestions opposing the petition.”

“A court, justice or judge entertaining an application for a writ of habeas corpus shall forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted, unless it appears from the application that the applicant or person detained is not entitled thereto.

“The writ, or order to show cause shall be directed to the person having custody of the person detained. It shall be returned within three days unless for good cause additional time, not exceeding twenty days, is allowed.”

5. The Court's Local Rules are only to be used as a supplement to federal law.
6. On June 18, 2024, the Court, in lieu of the § 2243 show cause order, issued an order directing the court clerk to issue summonses to the respondents.
7. The respondents were served on the following dates:

Mike Parson - 06/24/2024

Andrew Bailey - 06/24/2024

Brent Teichman - 07/16/2024

Denise Welch-Masters - 07/16/2024

8. The summonses required each respondent to enter appearance within 21 days of service, however, none did.
9. On August 27, 2024, Mr. Bradley submitted his *Motion for Order of Contempt and Order to Show Cause* – requesting that the Court hold all of the respondents in contempt of court for failing to acknowledge the summonses served on them and that it issue the appropriate show cause order.
10. On September 6, 2024, Mr. Bradley filed a memorandum for the record to reflect that he believed the adjudication of his *Petition* seemed to be approaching judicial misconduct.
11. On September 9, 2024, a one Mr. Andrew Clarke then finally entered his appearance on behalf of Andrew Bailey, the Missouri Attorney General – 77 days after service of the summons from the Court.
12. On September 10, 2024, instead of providing a response to Mr. Bradley's *Petition*, Mr. Andrew Clarke, on behalf of Andrew Bailey, the Missouri Attorney General, put forth his efforts towards moving the court for an extension of time – after having been in contempt of court for 56 entire days.
13. On September 10, 2024, prior to Mr. Andrew Clarke's motion, Mr. Bradley amended his *Motion for Order of Contempt and Order to Show Cause* – requesting that the Court hold all of the respondents except Andrew Bailey, the Missouri Attorney General, in contempt for failing to acknowledge the summonses served on them and that it issue the appropriate show cause order.
14. On September 13, 2024, the Court issued an order regarding Mr. Bradley's *Amended Motion for Order of Contempt and Order to Show Cause* – denying his request that all of the respondents except Andrew Bailey, the Missouri Attorney General, be held in

contempt for failing to acknowledge the summonses served on them and granting his request that it issue a § 2243 show cause order.

15. On September 13, 2024, the Court's *Order to Show Cause* followed shortly after the aforementioned order of the same date.
16. Although Mr. Bradley's motion for a § 2243 show cause order was granted, the show cause order that was issued is inconsistent with 28 U.S.C. § 2243 in that the Court has allowed the respondents 30 days to respond – completely disregarding the mandate that the show cause order “be returned within three days unless for good cause shown.”
17. Mr. Bradley is puzzled as to where the Court has ascertained its discretion to disregard the federal law provided in 28 U.S.C. § 2243, as no good cause has been shown as to why the respondents should be allowed more than the federally prescribed three days.
18. Mr. Bradley has made several claims that the adjudication of his *Petition* has been unduly delayed within this Court and holds out that it is *still* being so delayed.
19. In the Court's order referenced in point 14 hereto, the Court insists that Mr. Bradley's claims of undue delay carry no weight under the pretense that he is not in custody.
20. In the same order, the Court makes the following assertion:

“Therefore, the policy concerns that typically warrant expeditious resolution of 2254 motions are not present here because Plaintiff is not being detained in violation of the constitution.”
21. In the aforementioned assertion, the language is ambiguous and can be perceived as the court determining the merits of Mr. Bradley's *Petition* before any of the respondents have even responded.
22. With all due respect, Mr. Bradley perceives the Court's insistence that he is not in custody as nothing more than outright sophistry and consequently questions if this Court will be able to reasonably determine the merits of his *Petition*.
23. Not in custody? If the Court truly believed that to be true, it should have forthwith dismissed the case according to 28 U.S.C. § 2243, as a person not in custody is not entitled to seek habeas relief.
24. Furthermore, the Supreme Court of the United States has provided precedent as to the question of custody in *Jones v. Cunningham*, 371 U.S. 236 (1963) in determining that a person on parole was, in fact, “in custody” because it didn't matter if he was in physical confinement, but what mattered was if his “liberty to do those things which, in this

country, free men are entitled to do" was restrained because "[s]uch restraints are enough to invoke the help of the Great Writ."

25. In having elucidated in *Jones v. Cunningham*, *supra*, that "the use of habeas corpus has not been restricted to situations in which the applicant is in actual, physical confinement," the Supreme Court does not suggest that cases lacking the physical confinement element should be adjudicated any differently – the contrary can actually be deduced – leaving this Court's decision to carry out proceedings in a manner that deviates from the established law governing all petitions for habeas relief utterly unfounded.
26. The Court seems to be trying to evade accepting accountability in the disorderly adjudication of Mr. Bradley's *Petition*, however, accepting such would be much more respectable and preserve the judiciary's integrity.
27. If the court refuses to sympathize with the forgoing and continues in its mistaken belief that Mr. Bradley's *Petition* does not warrant an expeditious resolution, as is to be accorded to **all** petitions for writ of habeas corpus, Mr. Bradley will have no choice but to perceive that as an act of bad faith on behalf of the Court and will be forced to file a complaint with a higher tribunal that will.
28. Lastly, Mr. Bradley holds out that Mike Parson, Brent Teichman, and Denise Welch-Masters are all in contempt of court for failure to acknowledge the summonses served on them by this Court and he is skeptical of collusion between the Court and the State of Missouri because the Court did not hesitate in threatening to hold him in contempt of court for his failure to provide a mailing address because of his lack thereof.

**WHEREFORE**, Mr. Bradley wholeheartedly prays this court hearken to justice, amending its *Order to Show Cause*, directing the respondents to respond by the week's end, holding Mike Parson, Brent Teichman, and Denise Welch-Masters in contempt of court if they fail to enter appearances before the Court's ruling on this motion, and whatever else the Court may deem just and proper given the circumstances.

Respectfully submitted,

/s/Trey Tarell Bradley

Trey Tarell Bradley

parthenianheir@gmail.com

*Pro Se*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed with the United States District Court for the Western District of Missouri – Western Division by the clerk's office on this 22nd day of September, 2024 and that notification of such filing is automatically electronically served to all attorneys of record through the online E-filing system.

/s/Trey Tarell Bradley  
Trey Tarell Bradley

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

TREY TARELL BRADLEY )  
\_\_\_\_\_  
Plaintiff )  
\_\_\_\_\_  
vs. ) 24-CV-00351  
MIKE PARSON, ET AL. ) Case No. \_\_\_\_\_  
\_\_\_\_\_  
Defendant )  
\_\_\_\_\_  
)

APPLICATION FOR LEAVE TO FILE ACTION  
WITHOUT PAYMENT OF FEES  
WITH AFFIDAVIT OF FINANCIAL STATUS IN SUPPORT

I state that I am unable to pay the fees to file an action against the defendant(s) in this case  
and that the actions of the defendant(s) have harmed me.

Attached is my Affidavit of Financial Status in support of my application to the court for  
leave to file a civil action without payment of costs.

*Trey Bradley*  
Plaintiff

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI

TREY TARELL BRADLEY

Plaintiff )  
vs. ) 24-CV-00351  
MIKE PARSON, ET AL. ) Case No. \_\_\_\_\_  
Defendant )

AFFIDAVIT OF FINANCIAL STATUS

Trey Bradley

I, \_\_\_\_\_, declare that I am the plaintiff in this case, that because of my poverty I am unable to pay the costs of these proceedings, and that I believe I am entitled to relief.

I further swear that the responses which I have made to the questions below and the information I have given relating to my ability to pay the costs of commencing and prosecuting this action are true.

I. MARITAL STATUS AND PERSONAL DATA

A. Single  Married  Separated  Divorced   
N/A

B. Name of Spouse \_\_\_\_\_ 27

C. Age of plaintiff, petitioner or complainant: \_\_\_\_\_  
N/A

D. Age of spouse: \_\_\_\_\_

E. Address of plaintiff, petitioner or complainant:  
3560 Broadway, Kansas City, Missouri 64111

8164219015

Telephone: \_\_\_\_\_ N/A

F. Address of spouse: \_\_\_\_\_ N/A

Telephone: \_\_\_\_\_

A. State name or names of dependents who live with you, their age, address, relationship, and how much of their monthly support you provide  
N/A

## II. EMPLOYMENT

N/A

A. Name of employer: \_\_\_\_\_  
N/A

Address of employer: \_\_\_\_\_  
N/A N/A

Employer's telephone: \_\_\_\_\_ Length of employment: \_\_\_\_\_  
N/A

Job title or description: \_\_\_\_\_ N/A N/A

Net Income: Monthly \$ \_\_\_\_\_ Weekly \$ \_\_\_\_\_  
N/A N/A

Gross Income: Monthly \$ \_\_\_\_\_ Weekly \$ \_\_\_\_\_

Does employer provide health insurance: Yes  No   
N/A

If employer provides health insurance, describe coverage: \_\_\_\_\_

B. Previous employment (Answer only if presently unemployed).  
Kevin Puckett Attorney at Law, LLC

Name of employer: \_\_\_\_\_  
4700 Belieview KCMO, 64112

Address of employer: \_\_\_\_\_  
2021-22

Employer's telephone: \_\_\_\_\_ Length of employment:  
Office Manager/Effective Paralegal

Job title or description: \_\_\_\_\_  
Net Income: Monthly \$ \_\_\_\_\_ Weekly \$ \_\_\_\_\_  
1,240

Gross Income: Monthly \$ \_\_\_\_\_ Weekly \$ \_\_\_\_\_

C. Employment of spouse:  
N/A

Name of employer: \_\_\_\_\_

N/A

Address of employer: \_\_\_\_\_ N/A N/A

Employer's telephone: \_\_\_\_\_ Length of employment: \_\_\_\_\_  
N/A

Job title or description: \_\_\_\_\_ N/A N/A

Net Income: Monthly \$ \_\_\_\_\_ Weekly \$ \_\_\_\_\_  
N/A N/A

Gross Income: Monthly \$ \_\_\_\_\_ Weekly \$ \_\_\_\_\_

**III. FINANCIAL STATUS**

(Answer questions on behalf of both the plaintiff, petitioner or complainant and spouse).

A. Owner of real property? Yes  No

If yes - Description: \_\_\_\_\_

Address: \_\_\_\_\_

In whose name? \_\_\_\_\_

Estimated value: \_\_\_\_\_

Total amount owed: \_\_\_\_\_

Owed to: \_\_\_\_\_

Annual income from property: \_\_\_\_\_

B. Owner of automobile: Yes  No

If yes - Number of automobiles owned: \_\_\_\_\_

Make \_\_\_\_\_ Model \_\_\_\_\_ Year \_\_\_\_\_

Make \_\_\_\_\_ Model \_\_\_\_\_ Year \_\_\_\_\_

In whose name registered? \_\_\_\_\_

Present value: \_\_\_\_\_

Amount owed on the automobile(s): \_\_\_\_\_

Owed to: \_\_\_\_\_

Monthly payment(s): \_\_\_\_\_

C. Checkmark one (1) bank, checking and savings accounts:

0

1

2

List names and addresses of banks and associations:

N/A

Please do not state account numbers

D. Have you received within the past 12 months any money from any of the following sources:

	Yes	No
Rent payments, interest or dividends?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pensions, trust funds, annuities or life insurance payments?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gifts or inheritances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Welfare payments?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ADC or other governmental child support?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Unemployment benefits?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Social Security benefits?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other sources?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

E. If the answer to any item in D above was "Yes", describe each source of money and state the amount received from each during the past 12 months:  
N/A

IV. OBLIGATIONS

N/A

A. Monthly rental on house or apartment: \_\_\_\_\_

N/A

B. Monthly mortgage payments on house: \_\_\_\_\_

Amount of equity in house: \_\_\_\_\_

N/A

C. Monthly mortgage payments on other properties: \$ \_\_\_\_\_

Amount of equity in other properties: \$ \_\_\_\_\_

D. Household expenses: **Inestimable - Varies**

Monthly grocery expense: \_\_\_\_\_

Monthly utilities:

Gas: \_\_\_\_\_

Electric: \_\_\_\_\_

Water: \_\_\_\_\_

Other: (Specify) \_\_\_\_\_

E. Other debts and miscellaneous monthly expenses:

TO WHOM OWED AND FOR WHAT REASON INCURRED?	MONTHLY PAYMENTS	BALANCE DUE

V. OTHER INFORMATION PERTINENT TO FINANCIAL STATUS

(Include information regarding stocks, bonds, savings bonds, either individually or jointly owned).

N/A

I understand that a false statement or answer to any question in this affidavit will subject me to penalties of perjury.

Jay Bradley  
Signature of Plaintiff

#### VERIFICATION

State of Washington )  
County of District of Columbia )

I, being first duly sworn under oath, state that I know the contents of this affidavit and that the information contained in the affidavit is true to the best of my knowledge and belief.

Jay Bradley  
Signature of Plaintiff or Plaintiffs

All parties must verify

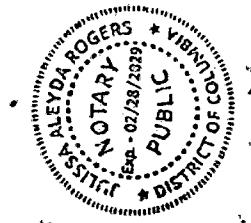
SUBSCRIBED AND SWEORN TO before me this 22 day of May, 20 24

J. A. Ray  
Notary Public

2/28/2029

My Commission Expires

JULISSA ALEYDA ROGERS  
Notary Public, District of Columbia  
My Commission Expires 2/28/2029



**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

TREY TARELL BRADLEY, )  
Plaintiff, )  
vs. )  
MIKE PARSON, et al, )  
Defendants. )  
Case No. 24-00351-CV-W-GAF

**ORDER GRANTING MOTION TO PROCEED IN FORMA PAUPERIS**

Now pending before the Court is *pro se* Plaintiff's Motion for Leave to Proceed *In Forma Pauperis*. (Doc. 3). In addition to his Motion, Plaintiff has filed a Financial Affidavit for the Court's review. (Doc. 4). Also pending is a motion for the court to issue an order on his motion for leave to proceed in forma pauperis. (Doc. 5). Upon review of these documents and for good cause shown, it is ORDERED that:

1. Plaintiff's Motion for Leave to Proceed *In Forma Pauperis* is GRANTED;
2. Plaintiff's Motion for determination regarding application to proceed in forma pauperis is DENIED as moot;
3. Plaintiff's Petition for Writ of Habeas Corpus (Doc. 1) and the Civil Cover Sheet (Doc. 1-2) are deemed filed as of the date of this Order;
4. The Clerk of Court shall mail a copy of this Order to Plaintiff at 3560 Broadway, Kansas City, MO 64111, along with appropriate process forms;<sup>1</sup>
5. Within 20 days, Plaintiff shall return the completed summonses and service forms to the Clerk's Office showing the address where the defendants may be served; and
6. The Clerk of Court is directed to issue summons and process and deliver same to the United States Marshal for service upon the defendants pursuant to Rule 4 of the Federal

<sup>1</sup> The Clerk is permitted to email the process forms to Plaintiff if he so requests. Any request must be emailed to [kcgen@mow.uscourts.gov](mailto:kcgen@mow.uscourts.gov).

Rules of Civil Procedure.<sup>2</sup>

s/ Gary A. Fenner  
GARY A. FENNER, JUDGE  
UNITED STATES DISTRICT COURT

DATED: May 23, 2024

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<sup>2</sup> Plaintiff has also filed a motion for order fixing a time for respondent to file opposing suggestions. (Doc. 6). The Court cannot order the defendants to file opposing suggestions until Plaintiff returns the completed summons and service forms because the Court does not possess the necessary information on where to serve such an order on defendants. Therefore, this motion is DENIED. Plaintiff need not renew this request; the Court is aware that it must set a date for the opposing suggestions and will do so at the appropriate time.