

NO. 24-5835 ORIGINAL

IN THE
SUPREME COURT OF THE
UNITED STATES

FILED

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OFFICE OF THE CLERK
SUPREME COURT, U.S.

Jaylin Godbolt - Petitioner

VS.

People - Respondent(s)

On Petition For A Writ Of
Certiorari To

Court of Appeal of the State of California
Second Appellate District, Division Two,

NO: B362235

Jaylin Godbolt
Centinela State Prison
P.O. Box: 731
Imperial, CA 92251

Questions Presented

- (1) Did the psychological manipulation tactics used in ~~Godbolt's~~ Perkins operation with real time monitoring violate Godbolt's Right to due process of law under the ~~Fourth~~ Fourteenth Amendment?
- (2) Under the totality of Circumstances, was the Police Stratagem of psychological coercion the proximate cause of Godbolt's Confession, making it involuntary and thus violating his Right to due process of law under the Fourteenth Amendment?
- (3) Did the admission of Coappellants Perkins statements violate appellants right to confrontation under the Sixth Amendment because they were testimonial?
- (4) Did the admission of ~~the~~ Coappellants Perkins statements violate appellants right to due process of law under the Fifth and Fourteenth Amendments because "declarations against penal interests" is not firmly rooted hearsay exception?

(5) Did the trial Court err in failing to instruct that accomplice testimony should be viewed with caution?

(6) Did the cumulative effect of the prejudice from the errors deprive appellant of his right to a fair, to due process, and to present a defense under the Fifth and Fourteenth amendments?

List of Parties

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

☐ All parties do not appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:
Los Angeles County Sup. Ct. No: KA116437

Related Cases

• Saylin Godbolt v. Warren Montgomery, No: 2:21-cv-09640-PA-ADS, U.S. District Court, Central District of California. Judgment entered 6/29/23

• Saylin Godbolt v. Warren Montgomery, No: 23-55638, U.S. Court of Appeals for the Ninth Circuit. Judgment entered 8/23/24

• People v Godbolt, No: S268148, U.S. Supreme Court of California. Judgment entered on 6/30/21

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Appendix B: Decision of state trial court
Appendix C: Decision of state Supreme Court

IN THE
SUPREME COURT OF THE
UNITED STATES

Petition For Writ of Certiorari

Petitioner respectfully prays that a writ of certiorari
issue to review the Judgment below.

OPINIONS BELOW

☐ For Cases from Federal Courts

The Opinion of the United States Court of appeals
appears at Appendix _____ to the petition and is

☐ reported at _____; or, ☐ has been
designated for publication but is not yet reported;
or ☐ is unpublished.

The Opinion of the United States district Court appears
at Appendix _____ to the petition and is

☐ reported at _____; or, ☐ has been designated
for publication but is not yet reported; or, ☐ is
unpublished.

☒ For Cases from State Courts:

The Opinion of the highest State Court to review
the Merits appears at Appendix C to the petition
and is ☐ reported at _____; or, ☒ has
been designated for publication but is not yet reported;
or ☐ is unpublished.

The Opinion of the Second district Court appears at
appendix A to the petition and is ☐ reported
at _____; or ☒ has been ~~published~~

designated for publication but is not yet reported;
or ~~Do~~ [] is unpublished.

JURISDICTION

[] For Cases from Federal Courts:

The date on which the United States Court of Appeals decided my case _____

[] No petition for rehearing was timely filed in my case.

[] A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____

The Jurisdiction of this Court is invoked under 28 U.S.C. § 1254 (1).

[✓] For Cases from State Courts:

The date on which the highest State Court decided my case was on 6/30/21. A copy of that decision appears at appendix _____

[] An extension of time to file the petition for a writ of Certiorari was ~~on~~ granted to and including _____ (date) on _____ (date) in Application No. _____ A _____.

The Jurisdiction of this Court is invoked under 28 U.S.C. 1257

STATEMENT OF CASE

A Jury ~~and~~ found Godbolt guilty of first degree murder, four Counts of attempted premeditated murder, and one count of shooting into an inhabited dwelling based on an August 19, 2017 drive-by shooting. It also found true the gun and gang allegations on all Counts. (7ct 1879-1838) The Court sentenced appellant to 250 years to life plus 20 years. (8ct 2054; 2073-2080.) The Court of Appeal reversed one count of premeditated attempted murder, reducing Godbolt's sentence by 40 years to life, but otherwise affirmed the judgment. (opn. 5th mod, opn. 2)

Reason for Granting The Petition

Review is necessary to address important questions of law. Appellant urges this Court to grant review to decide two important issues of law related to the Perkins operation: Whether the deceptive interrogation tactics used in this case violated the due process clause of the Fourteenth Amendment, and whether they were lawful where they were used to deliberately circumvent the protection afforded to Godbolt under the fifth Amendment.

On a related issue, this Court should grant review to determine whether Coappellants' Perkins statements were testimonial. Even if the first Perkins ~~statements~~ ~~were~~ operation on ~~was~~ wise was investigatory, the subsequent operations on Godbolt and Ray were testimonial because they were ~~primarily~~ primarily aimed at gathering evidence for a prosecution.

CONCLUSION

For the foregoing reasons, appellant respectfully request this Court grant review.

Dated: 10/2/24

Respectfully Submitted
Jayi Seibolt
petitioner