ORIGINAL

24-5963

No. _____

IN THE

SUPREME COURT OF THE UNITED STATES

CAMERON DAVON WRIGHT
_____ — PETITIONER
(Your Name)

vs.

JAMES SCHIEBNER
_____ — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

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

PETITION FOR WRIT OF CERTIORARI

CAMERON DAVON WRIGHT #715287
(Your Name)
Muskegon Correctional Facility
2400 S. Sheridan Drive
(Address)

Muskegon, Michigan 49442
(City, State, Zip Code)

(Phone Number)

QUESTIONS PRESENTED

I.

DID THE LOWER-COURT CLEARLY MISAPPLY UNITED STATES SUPREME COURT PRECEDENT IN A MANNER THAT DENIED FUNDAMENTAL JUSTICE, WHEN IT USED A SUFFICIENCY OF THE EVIDENCE TEST RATHER THAN THE TEST ENUNCIATED IN BRECHT V. ABRAHAMSON,507 US 619,622;113 S Ct 1710;123 L Ed 2d 353 (1993) TO DETERMINE WHETHER A CONSTITUTIONAL TRIAL ERROR HAD A SUBSTANTIAL AND INJURIOUS EFFECT OR INFLUENCE ON THE JURY'S VERDICT?

Petitioner, Answers "Yes".
Respondent, Answers "No".

II.

WHETHER THE TEST IN BRECHT V. ABRAHAMSON ENCROACHES ON THE STATE OF MICHIGAN'S REVERSIBLE ERROR DOCTRINE REGARDING THE ISSUANCE OF AN AIDING AND ABETTING INSTRUCTION, BECAUSE WHEN DETERMINING WHETHER THE ERRONEOUSLY ADMITTED EVIDENCE HAD A SUBSTANTIAL AND INJURIOUS EFFECT OR INFLUENCE ON THE JURY'S VERDICT, THE BRECHT TEST DOES NOT CONSIDER THE CIRCUMSTANCES THAT HAD THE ERRONEOUS EVIDENCE BEEN EXCLUDED THE TRIAL JUDGE WOULD HAVE NEVER GIVEN THE AIDING AND ABETTING INSTRUCTION, AND THEREFORE A DIRECTED VERDICT WOULD HAVE BEEN APPROPRIATE BECAUSE IN CLOSING ARGUMENTS THE STATE CONCEDED THEY COULD NOT PROVE BEYOND A REASONABLE DOUBT PETITIONER FIRED THE FATAL SHOT, AND THE STATE RELIED HEAVILY ON THE ERRONEOUS EVIDENCE TO SUPPORT ITS THEORY THAT PETITIONER MUST HAVE AIDED AND ABETTED?

Petitioner, Answers "Yes".
Respondent, Answers "No".

LIST OF PARTIES

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

[ ] All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

RELATED CASES

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TABLE OF AUTHORITIES CITED

CASES — PAGE NUMBER

UNITED STATES CONSTITUTIONS

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

[XX] For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix E to the petition and is

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

The opinion of the United States district court appears at Appendix D to the petition and is

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

[ ] For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix _____ to the petition and is

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

The opinion of the _____ 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.

JURISDICTION

[XX] For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was June 21, 2024.

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

[XX] A timely petition for rehearing was denied by the United States Court of Appeals on the following date: August 13, 2024, and a copy of the order denying rehearing appears at Appendix F.

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

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

[ ] For cases from **state courts**:

The date on which the highest state court decided my case was _____. A copy of that decision appears at Appendix _____.

[ ] A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

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

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

U.S. Const., amend. V, provides:

"No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a grand jury, except in case arising in the land of naval forces, or in the militia, when in actual service in time of war or public danger;nor shall any person be subject for the same offense to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation".

US Const., amend. XIV, provides:

"All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No state shall make or enforce any law which shall abridge the privilege or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny any person within its jurisdiction the equal protection of the laws".

STATEMENT OF THE CASE

Petitioner Cameron Davon Wright was convicted by a jury in the Kent County Circuit Court in Grand Rapids, Michigan on a charge of first-degree premeditated murder. He was sentenced to life in prison without the possibility of parole. The Michigan Court of Appeals affirmed his conviction and sentence on July 1, 2021, see People v Wright,2021 Mich App Lexis 4065 (July 1, 2021), Appendix "A", and the Michigan Supreme Court on March 8, 2022, denied leave to appeal, People v Wright,509 Mich 866;970 NW2d 331 (March 8, 2022), Appendix "B", and reconsideration on May 31, 2022, People v Wright,2022 Mich Lexis 1009 (May 31, 2022), Appendix "C".

Petitioner then filed his writ of habeas corpus under 28 USC § 2254 claiming that his Fifth Amendment right against self-incrimination had been violated because he was "compelled" to give his pass codes to allow law enforcement to access his cell phone, which yielded text message evidence that the prosecution "used against him at trial".

The United States District Court for the Western District of Michigan, Southern Division, denied his writ of habeas corpus on November 8, 2023, Wright v Schiebner,2023 US Dist Lexis 200475 (W.D. Mich., November 8, 2023), Appendix "D", reasoning that Petitioner's claim was reasonably adjudicated on the merits by the State Courts. The District Court also denied him a certificate of appealability, and his motion for reconsideration.

The United States Court of Appeals for the Sixth Circuit also denied Petitioner's request for a certificate of appealability on these grounds on June 21, 2024. Wright v Schiebner,2024 US App Lexis 15170 (6th Cir., June 21, 2024), Appendix "E", and rehearing en banc on August 13, 2024, Wright v Schiebner,2024 US App Lexis 20419 (6th Cir., August 13, 2024), Appendix "F".

Petitioner now petitions this Honorable Court to issue a writ of

REASONS FOR GRANTING THE WRIT

This Court should grant certiorari under U.S. Sup.Ct.R. 10(c)... A United States Court of Appeals has decided an important question of federal law that has been, but should be settled by this Court, or has decided an important federal question in a way that conflicts with relevant decisions of this Court. Specifically, see, United States v Ross,92 US 281,283,284;11 S Ct 343;23 L Ed 707 (1875);see, also, Fahy v Connecticut,375 US 86,87;84 S Ct 229;11 L Ed 2d 171 (1963). Therefore, this Honorable Court should summarily reverse the lower courts judgment due to the lower courts demonstrably erroneous application of federal law. See Maryland v Dyson,527 US 465,465 n. 1 (1999).

The admission of the unconstitutionally admitted cell phone data and text messages had a substantial and injurious effect or influence on the jury's verdict. Brecht requires federal courts to review the state trial court record to determine whether the erroneously admitted evidence likely had a substantial and injurious effect or influence in determining the jury's verdict. Brecht v Abrahamsom,507 US 619,623;113 S Ct 1710;123 L Ed 2d 353 (1993), quoting Kotteakos v United States,328 US 750,776;66 S Ct 1239;90 L Ed 1557 (1946).

The Brecht test, we are told, is not one of "actual prejudice", which is to say, it is not a test that ask the court to look at the evidence, subtract out the erroneous evidence, then determine whether the properly admitted evidence suffices to convict. See Oneal v McAninch,513 US 432,438-439;115 S Ct 992;130 L Ed 2d 947 (1995)(noting that "Brecht is controlling to the extent it requires a petitioner to establish actual prejudice");see, also, Kotteakos,328 US at 764-65 (stating that the proper inquiry under the federal harmless error review statute is not whether the jurors "were right in their

judgment" or whether there was was enough to support the result apart from the phase affected by the error");Caldwell v Bell,228 F3d 842-43 (6th Cir. 2002). Rather the question is whether the error itself had a substantial influence on the verdict even if otherwise supported the verdict, and if so, or if one is left in grave doubt, the conviction cannot stand. Caldwell,228 F3d at 847.

The admission of the text messages had a substantial and injurious effect or influence on the jury's verdict in five ways-- 1) premeditation, 2) established elements for aiding and abetting, 3) time of murder, 4) tied the other circumstantial evidence together, 5) identity.

As to premeditation, the text messages showed Petitioner and alleged accomplice Derek Banks texting back and forth about seeing the victim with a gun around or in sight, and Petitioner texts Banks he doesn't see a gun and then directs Banks to come in at 9:39pm January 17th. And per the State's theory, this was proof beyond a reasonable doubt that this was a planned ambush and "premeditated murder". (TT, Day 6, pg. 29).

As to proof Petitioner was an aider or encouraged alleged accomplice Derrick Banks, "first and foremost" the State told the jury they couldn't prove who fired the fatal shot that killed the victim. (TT, Day 6, pg. 31). So it is clear there was no direct evidence Petitioner was the actual triggerman, and this effectively eliminated the possibility the jury convicted Petitioner as the principal.

Moving on to the evidence that established Petitioner was an aider and abettor. To prove that a Defendant aided and abetted in the State of Michigan, the prosecution must prove that 1) the crime charged was committed by the defendant or some other person; 2) the defendant performed acts or gave encouragement that assisted the commission of the crime; and 3) the

defendant intended the commission of the crime or had knowledge that the principal intended its commission at the time that the defendant gave aid and encouragement. People v Robinson,475 Mich 1;715; NW2d 44,47-48 (2006), quoting People v Moore,470 Mich 56;679 NW2d 41,49 (2004).

The crux of the State's theory falls upon the second element which was the conspiracy text messages sent from Petitioner to Banks directing him to come in at 9:39pm, January 17th. This was the State's circumstantial proof that Petitioner performed acts or gave encouragement that assisted the commission of the crime.

As to establishing the time of the murder, the conspiracy text messages per the State's theory, they specifically told the jury that at 9:39pm the victim is killed, and Petitioner is gone by 9:41pm because his phone was pinging off a different tower. (TT, Day 6, pg. 30).

As to the element of identity, the State could never establish proof beyond a reasonable doubt Petitioner fired the fatal shot that killed the victim. So they exclusively relied on the conspiracy text messages to prove that Petitioner directed Banks to come in and shoot the victim. However, the State told the jury that half of them, could believe Petitioner shot the victim and the other half could believe Banks shot the victim, but either way it didn't matter as long as they believed Petitioner gave aid , assistance or encouraged the commission of the crime. (TT, Day 6, pg. 32).

Finally, the text messages tied the other circumstantial evidence together and connected the inferential dots by establishing a timeline to coincide with 1) Bao Nguyen's testimony that he seen Petitioner outside the victim's apartment, 2) Petitioner's cell phone being in the general area of the victim, 3) debunked the defense theory and the medical expert time of death occurred on January 18th, and 4) placed the alleged accomplice on the

scene.

However, the Sixth Circuit Court of Appeals denied Petitioner a certificate of appealability, and found that the conspiracy text messages did not have a substantial and injurious effect or influence on the jury's verdict, and it based its conclusion on the following circumstantial evidence:

1) Petitioner deleted text messages from his old phone;

2) numerous contacts with the victim on January 16th and 17th totaling 48 times;

3) the victim received a phone call from Petitioner at 9:06pm on January 17th;

4) Petitioner got a new phone on the 18th of January and didn't put the victims contact into the phone list;

5) eyewitness Bao Nguyen saw Petitioner outside of the victim's apartment;

6) a drug customer of Petitioner testified Petitioner was late to deliver drugs;

and 7) an expert federal agent testified Petitioner and Banks were utilizing similar cell towers on the 16th and 17th of January and that at 9:40pm on the 17th Petitioner cell phone pinged off a tower located near the victims apartment.

Finally, the lower court stated at bottom the evidence showed that Petitioner knew Edward Welford and Tyrice Morris had been subpoenaed, was vocal about wanting to talk to the victim, had been communicating with the victim, and was in the vicinity of his apartment just before he was murdered.

Petitioner acknowledges that circumstantial evidence alone can support a conviction. However, there are times that it amounts to only a reasonable

speculation and not to sufficient evidence. See Newman v Metrish,543 F3d 793 (6th Cir. 2008), quoting Fuller v Anderson,662 F2d 420,423-24 (6th Cir. 1981)(verdict for felony murder not supported by evidence showing only that fuller was present at the scene of the arson where evidence did not establish beyond a reasonable doubt that Fuller consciously acted to aid in the arson).

Petitioner submits that without the conspiracy text messages that this is one of those times where the accused has had his conviction upheld based on a reasonable speculation of guilt. To start, none of the circumstantial evidence the lower courts have routinely relieD on, established that Petitioner gave aid, assistance, or encouraged Derrick Banks in the commission of the crime. The text messages supported the inference that Petitioner was an aider and abettor. However, without the text messages, the Sixth Circuit attempts to establish aid and assistance by relying on the federal agents testimony that Petitioner and Banks' phones were utilizing similar cell towers on the 16th and 17th of January. However, the 16th of January has no significant bearing on deciding the ultimate issue of whether Banks was with Petitioner inside the victim's apartment at 9:39pm on January 17th.

The erroneously admitted text messages was the only evidence that could have supported the inference that Petitioner directed Banks to come into the victim's apartment, and without them the record is without any evidence that Banks was present with Petitioner at the victim's apartment. Moreover, the federal agent expert testified, he couldn't track Banks phone from 8:15pm-8:40pm because he wasn't using his phone. (TT, Day 7, pg. 77). And Bao Nguyen only saw Petitioner outside of the victim's apartment at approximately 9:00pm. It is exclusively only with the conspiracy messages that the State can make the reasonable inference that Petitioner went inside of the victim's

apartment "after" Bao Nguyen saw Petitioner outside the apartment, and that while inside Banks is somewhere nearby and Petitioner texts him directing him to "come in", and thereby establishing aid, assistance, and encouragement in the commission of the crime of first-degree murder.

While in the same breath, the conspiracy establishes the elements for premeditated murder due to the State theorizing the conversation between[1] Banks and Petitioner, was the planning and ambush to murder the victim. (TT, Day 6, pg. 29). Without the conspiracy text messages no other evidence was presented by the State to show that Petitioner and Derrick Banks planned the ambush and murder of the victim.

The lower courts also placed great evidentiary value on the fact that Petitioner bought a new phone on the 18th of January and never added the victim's number as a contact. This circumstantial piece of evidence amounts to nothing but conjecture camouflaged as guilt because not only did Petitioner not add victim's contact into new phone, he also did not add 57 other contacts into new phone. (TT, Day 5, pg. 246).

Next the cell tower data only served to reinforce Bao Nguyen's testimony that he saw Petitioner outside of the victim's apartment, and was therefore cumulative evidence, not more evidence of guilt against Petitioner.

Moving on to the alleged fact that Nguyen saw Petitioner outside of the victims's apartment, "without" the conspiracy text messages, the State would have just had Petitioner's mere presence outside of the victim's place, which would have raised no suspicion because Petitioner and the victim were known friends and were often in contact with each other. See People v Burrel,253 Mich 321;235 NW2d 170 (1931)(mere presence, even with knowledge that an

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[1] Alleged accomplice Derrick Banks was never charged as a principal or aider in connection with murder of the victim Curtis Swift.

offense is about to be committed, or is being committed is not enough to make a person an aider and abettor).

The lower court completely overlooked the State's heavy reliance on the text messages in closing arguments, as it went to establishing: 1) premeditation, 2) time of murder, and 3) aid, assistance, or encouragement. (TT, Day 6, pg. 85)(prosecutor thanked God Petitioner didn't delete text messages; (TT, Day 6, pg 11)("planning and executing the murder of Swift"). See also, McCarley v Kelly,801 F3d 652,666 (6th Cir. 2015)(a prosecutor's heavy reliance on testimony during closing argument evidence's its importance in the case).

No other evidence was presented by the State proving an exact time for when the murder took place aside from the conspiracy text. The medical examiner opined the victim could have been killed on the 17th or 18th of January, as the Sixth Circuit acknowledged in its denial for a certificate of appealability. (See Wright v Schiebner,2024 US App Lexis 15170 (6th Cir., July 21, 2024), pg. 1, Appendix "E").

For instance, the Sixth Circuit stated that 1) Bao Nguyen, who had been at Swift's apartment to buy drugs ("just before his murder"), 2) and cell tower data placed Petitioner at Swift's home around the time time of the murder. (See Wright v Schiebner,2024 US App Lexis 15170 (6th Cir., July 21, 2024), pg. 3, Appendix "E"). Petitioner must point out that the only way the courts can use this reasoning as it goes to the time of the murder is exclusively due to the text messages regarding Petitioner's text to Banks to "come in" at 9:39pm, and the State arguing that the ambush and murder happened at the specific time of 9:39pm.

There is no way to know what time the victim was killed. The court seems to unconsciously rely on the conspiracy text in its opinion overview writing

and harmless error analysis. There is no way the court should be making a reference to an exact time for the murder. At a minimum, without relying on the conspiracy text messages, the time of the murder must be confined to the 17th or 18th of January. There was no evidence presented aside from the conspiracy text messages to suggest the victim was killed directly after Nguyen saw Petitioner outside the victims apartment at approximately 9:00pm.

Because 1) there was no proof Petitioner ever went inside the victims apartment, 2) there was no evidence presented that the victim was killed around the time Petitioner's cell phone was pinging off towers near Swift's at 9:40pm, there is a significant hole in the State's theory that cannot be circumstantially filled without relying on the conspiracy text messages to connect the inferential dots needed to make the State's case:

A) Bao Nguyen puts Petitioner outside at 9:00pm, when viewed with the text messages they support the inference he went inside, without them the State would have a mere presence situation;

B) at 9:40pm Petitioner phone was near victim's towers, with the text messages they support the inference that not only is Petitioner near victim's tower, he is inside of the victim's apartment and texts Banks to "come in";

C) the text messages tied the timeline together from Nguyen seeing Petitioner at 9:00pm to 9:39pm and Petitioner directs Banks to come in.

Without the conspiracy text's, the State's case would have failed because they cannot place Petitioner inside of the victim's place and there is no evidence to place an accomplice with Petitioner at 9:39pm-9:41pm on January 17th, 2018, in which that much evidence is needed in the State of Michigan to convict a defendant under an aiding and abetting theory. See People v Parks,57 Mich App 738 (1975)(the sine qua of aiding and abetting is that more than one person must be criminally involved either before, during,

the commission of the crime in order to sustain a charge of aiding and abetting against an accessory; the guilt of another person must be shown);see also, People v Ware,12 Mich App 512;163 NW2d 250 (1968)(it is reversible error for the court to give instructions upon a theory for the prosecution which is unsupported by the evidence). Excluding the conspiracy text messages there would not have been no substantive proof to justify the trial court's instruction on the theory of aiding and abetting.

The Supreme Court has said that harmless error review is not the same as a sufficiency of evidence review. Fahy v Connecticut,375 US 86,87;84 S Ct 229;11 L Ed 2d 171 (1963)("We are not concerned...with whether there was sufficient evidence on which the Petitioner could have been convicted without the evidence complained of. The question is whether there is a reasonable possibility that the evidence complained of might have contributed to the conviction").

If the lower court had applied the proper test set forth in Brecht v Abrahamson,supra, rather than the prohibited sufficiency of the evidence test, then it would have been clear that the unconstitutionally admitted text messages had a substantial and injurious effect or influence on the jury's verdict under Brecht because "with them" the State was able to prove 1) premeditation, 2) aid and assistance, and that an accomplice was present, 3) time of murder, 4) and tied the other evidence together and connected the dots, and without them the State would have been left in a mere presence alone outside the victim's house.

Without the text messages, the State would have to rely on reasonable speculation that Petitioner went inside the victim's apartment, based on Petitioner's proximity to the victim's apartment. However, to arrive at a conclusion that Petitioner must have went inside the victim's place, based on

the inference that he was seen only outside, without more, is impermissible. See United States v Ross,92 US 281,283,284;11 S Ct 343;23 L Ed 707 (1875)(holding that arriving at a conclusion of fact by inferring from inferences is generally not admissible). "Whenever circumstantial evidence is relied upon to prove a fact, the circumstances must be proved and not themselves presumed". Ross,92 US at 284.

Here, the State offered no evidence Petitioner was actually inside the victim's house at 9:39pm. The text messages were the only evidence in which the jury could infer Petitioner was inside the victim's place with accomplice Derrick Banks. Moreover, the Sixth Circuit has granted writs when the erroneously admitted evidence was the only evidence establishing premeditation, and aiding and abetting. See Scott v Gundy,100 Fed.Appx 476 (2004)(stating that although their may have been sufficient evidence to convict defendant of murder, however without the admission of the unconstitutionally admitted evidence the State was unable to prove premeditation. Therefore, its admission was not harmless. See Hill v Hofbauer,337 F3d 706 (2003)(Brecht satisfied where codefendant's wrongly admitted confession supplied the only evidence that defendant knew that his cohort had a weapon which under State law satisfied the intent element for aiding and abetting a murder);see also, Moore v Berghuis,700 F3d 882,889-90 (6th Cir. 2012)(concluding that lack of direct evidence under the circumstances was indicative of error under Brecht).

The aforementioned cases above had substantially much more evidence against the accused than Petitioner had against him. However, the lower courts decisions were based on an unreasonable determination of the facts and law in light of the evidence presented in state court proceedings. Williams v Taylor,529 US 362;120 S Ct 1495;146 L Ed 2d 389 (2000).

CONCLUSION:

Based on the reasons mentioned above in the petition, Petitioner submits he has passed the Brecht test because the erroneously admitted evidence was the only evidence presented by the State establishing 1) premeditation, 2) aid, assistance and encouragement, 3) pinpointed the exact time of murder, 4) it was the only evidence placing accomplice on the scene with Petitioner near the victim's residence.

Therefore, Petitioner ask this Court to "summarily reverse" the lower courts decision and correct the demonstrably erroneous application of federal law. Maryland v Dyson,527 US 465 n. 1. (1999). Moreover, Petitioner acknowledges that a state court's analysis of harmless error in a typical case may not present a question worthy of full review by this court. McKenzie v Montana,449 US 1050 (1980). Yet, this is not a typical case because the lower courts have disregarded the Brecht test, although they mentioned it and cited it, they did not follow it because its clear the erroneously admitted evidence eliminated the space for reasonable doubt in the jury's mind, as it had substantial and injurious effect or influence on the jury's verdict under Brecht.

Petitioner also has shown by clear and convincing evidence that the lower courts factual determination was wrong. Tharpe v Sellers,583 US 33 (2018). And for the reasons stated above, reasonable jurist would find the Sixth Circuit's procedural ruling debatable or wrong. Slack v McDaniel,529 US 473 (2000).

RELIEF REQUESTED

Petitioner, Cameron Davon Wright # 715287, respectfully requests this Honorable Court to grant the Writ of Certiorari, and summarily reverse the judgment of the lower courts denying him a certificate of appealability.

Declaration

I, Cameron Davon Wright #715287, declares subject to penalties of perjury that the above statements are true and correct to the best of my information, knowledge, and belief, and made in good faith.

CAMERON DAVON WRIGHT #715287
Muskegon Correctional Facility
2400 S. Sheridan Drive
Muskegon, Michigan 49442

Date: 10/24/24