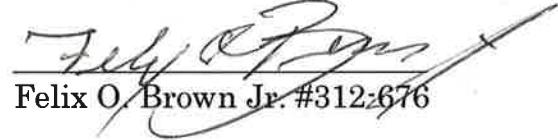


proceeding, in state and federal courts⁴. And if by chance a petition is successful in having the merits of constitution violations addressed and the conviction reversed the prosecutors know that they shall have another opportunity to retrial said petitioner: in spite of the wanton constitution violations that the prosecution undertook in the first instance to prevent the petitioner from receiving an acquittal or a hopelessly deadlocked jury.

CONCLUSION

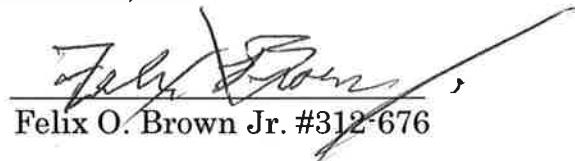
The petition for a writ of certiorari should be granted.

Sincerely submitted,


Felix O. Brown Jr. #312-676

CERTIFICATE OF SERVICE

I hereby certify that a true and full copy of the foregoing Petitioner's Reply Motion was sent to Trumbull County Prosecutor, at 160 Main St., Warren, Ohio, 44481, via First Class U.S. Mail, on this 17th day of March, 2025.


Felix O. Brown Jr. #312-676

MAILING DECLARATION

I, Felix O. Brown Jr., do herein swear, affirm, and attest, under the penalty of perjury, and under the authority of *Houston v. Lack*, that the original of this

⁴ Newly discovered Brady violations contained within a second or successive 28 U.S.C.S. § 2254 habeas petition are subjected to the gatekeeping restriction contained in 28 U.S.C.S. § 2244.