

No. 17-6595

OCTOBER TERM, 2017

In The Supreme Court of the United States

WILLIAM A. LINDSEY, Petitioner,

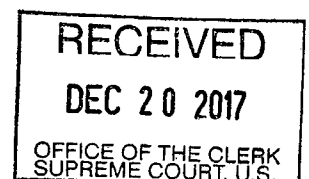
v.

STATE OF COLORADO, Respondent

On Petition for Writ of Certiorari to the

State of Colorado Supreme Court

**EMERGENCY APPLICATION FOR BOND PURSUANT TO 16-12-103 C.R.S. § C.A.R. 8.1, 9
and 55; FED R. APP. PROC. 8 (a)(1); and FED. R. CRIM. P. 38 PENDING FINAL ORDER OF
THE UNITED STATES SUPREME COURT ON PETITION FOR WRIT OF CERTIORARI TO
THE STATE OF COLORADO SUPREME COURT**



The Petitioner, William Arthur Lindsey, unrepresented moves this Honorable Court to enter an Order granting bond in this case, pending the final order of the United States Supreme Court on petition for certiorari. In support of this Emergency Application, Petitioner respectfully shows as follows:

FIRST REQUEST

1. Petitioner originally requested an appeal bond in Jefferson County District Court on August 25 2015, where the District Court Judge Todd L. Vriesman (the judge in which the Writ of Certiorari entails) denied appeal bond on October 19, 2015 (*see attached*)

SECOND REQUEST

2. Petitioner, by and through Appellate Counsel Robert T. Fishman moved for an appeal bond on January 5, 2017 in the Colorado Court of Appeals, which was Denied without explanation on January 30, 2017 (*see attached*)

THIRD REQUEST

3. Petitioner, by and through Appellate Counsel Robert T Fishman moved for an appeal bond on June 21, 2017 in the Colorado Court of Appeals which was denied without explanation on July 24, 2017 (*see attached*)

FOURTH REQUEST

4. Petitioner, by and through Appellate Counsel Robert T Fishman moved for an appeal bond on November 1, 2017 in the Colorado Court of Appeals which was denied without explanation on November 7, 2017 (*see attached*)

FIFTH REQUEST

5. Petitioner, by and through Appellate Counsel Robert T Fishman moved for an appeal bond on November 27, 2017 in the Colorado Court of Appeals which was denied without explanation on November 29, 2017 (*see attached*)

The Equities Weigh Strongly In Favor of Granting a Bond

6. Lindsey submit three major issues on petition for writ of certiorari review which warrant a bond:
- (a) Did the trail judge's failure to recuse himself from Lindsey's criminal case violate federal due process clause?
 - (b) By the Colorado Supreme Court passing on the legal question violate the federal due process clause? and;
 - (c) Did the Colorado Supreme Court's failure to entertain the motion to recuse violate the federal due process clause?

CONCLUSION

A failure to grant bond pending final disposition of this case by the United States Supreme Court will result in continued deprivation of Lindsey's rights to a fair, neutral tribunal, and due process.

Furthermore, the delay tactics by the Attorney General of the State of Colorado of continually request of extensions of time over 300+ days when **West's Colorado Practice Series, Book 18 Colorado Appellate Law and Practice section 14.6 §** "Extensions of time for briefs" plainly states extension for "answer brief" 20 days. 'first request'. 'Second request' 15 days with no further extensions," thus causing irreparable injury to his businesses and liberty.

If the bond is granted on the other hand, no injury can possibly result to the State of Colorado.

In closing Lindsey stated that District Court Judge Todd L. Vriesman is barred under operations of law from addressing this or any other motions in this case by reason(s), (1) it is a direct appeal of his decision, and (2) he has denied two post conviction motions in excess of jurisdiction during direct appeal in state court.

WHEREFORE, Petitioner William A. Lindsey, request that this Court grant emergency application for bond forthwith.

Dated this 17th day of December 2017.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "William A. Lindsey", with a horizontal line drawn underneath the signature.

William A. Lindsey
DOC # 169718
Unrepresented Inmate
Bent County Correctional Facility
11560 CO. RD. FF. 75
Las Animas, CO 81054

Unrepresented Petitioner

Supreme Court of the United States

1 First Street, NE

Washington, DC 20543

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 17, 2017.

William A. Ruck