

IN THE SUPREME COURT OF THE UNITED STATES

GARY D. KING #1300812

Appellant.

VS.

WALTER BERRY, Warden

Appellee

No. 17-6874

Supplement Based On New Law; Intervening Matter

COMES NOW, GARY D. KING, in compliance with
sup. ct. R. 15.8 supplements claims as follow

I.

JURISDICTION

United States Supreme Court has jurisdiction
to entertain substantial claims properly before it.

Factual Facts

On October 26, 2017, my petition for certiori

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was filed in The United States Supreme Court. On October 31, 2017, Georgia Court of Appeals, case no. A17A1270 was deciding regarding a motion in Limine. My conviction was in the state of Georgia, Troup County Superior Court, January 9, 2009. (Trial Judge, Dennis Blackmon, ADA, Monique Kirby, and Public Defender Attorney, Jamie Roberts.

On December 14-21st, 2017, I received new intervening information that substantially sheds light on a motion in Limine and incompetence.

Matter Peterson, a Trump judicial nominee, was unaware of basic legal matters during his hearing to be a federal judge.

James C. Ho and Don Willett was confirmed to the federal courts 5th and 11th circuits. My case is out of the conservative courts.

Jamie Roberts, my trial attorney, was incompetent to a motion in Limine.

II.

STATEMENT OF ISSUES

C.) Ineffective Assistance of Counsel

1. Trial Judge, Dennis Blackman, instructed the jury to consider prior consistent and prior inconsistent statements as substantive evidence. Was trial counsel's failure to file a motion in Limine to introduce prior inconsistent statements of the alleged victim not harmless?

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III.

LEGAL ARGUMENTS

C.) Ineffective Assistance of Trial Counsel

1. Was trial counsel's failure to file a motion in Limine to introduce substantive prior incon-

sistent statements made by the alleged victim not harmless?

a) Because the trial judge, Dennis Blackmon, charged the jury to consider prior consistent and prior inconsistent statements as substantive evidence (), Jamie Roberts incompetent failure to file a motion in Limine to introduce the substantive prior inconsistent statements, clearly was harmful error, because the jury decided the "alleged victim's" credibility without the substantive evidence.

See State v. Almanza, Georgia Court of Appeals, A17A1270 (October 31, 2017) (The state filed a motion in Limine to introduce prior out of court testimony in a child molestation case, motion was granted in part.) Compare WASHINGTON (AP) December 21, 2017 08:37 ("Trump's judicial nominee ..., Matthew Petersen, tapped by Trump

to serve on the U.S. District Court for the District of Columbia, ... law degree from the University of Virginia; ... Bachelor of Civil Law from "Oxford University, ... first-class honors). Unfortunately, Matter did not know what a "motion in Limine" is.

The point is, it cannot be said that my trial counsel, Jamie Roberts, was competent to basic legal representation, and if so, she was objectively unreasonable for not filing a motion in Limine to supplement my defense.

In Matthew Petersen's resignation letter to the president dated Saturday, Dec. 16 he did say: "However, I am no stranger to political realities."

WASHINGTON (AP) December 18, 2017 19:56. Neither I am I. ("Sen. John Cornyn, R. Texas, a mem-

ber of the Judiciary Committee said: "but there's been a few of them who seem to have slipped through"). "I strongly agree".

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IV.

CONCLUSION

It was clearly objectively unreasonable and incompetent performance to not offer a motion in Limine to introduce substantive evidence relevant to my defenses. My conviction in 2009 Troup Co. Superior Court, Georgia was solely on hearsay evidence, "Alleged victims" credibility decided without the prior substantive inconsistent statements that was charged to the jury to consider by Judge Dennis Blackmon. The slip through the cracks jurist has gotten it wrong so far.

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WHEREFORE Petitioner, Gary D. King, prays this
HONORABLE COURT grant petition for certior.

Respectfully Submitted

Gary D. King 12.25.17
Gary D. King

Happy Holidays !!!

I have served my supplement upon the following
U.S. mail service with proper postage herein (B.K.) 12.25.17

Office of The Clerk
Lisa Nesbitt

SUPREME COURT of the U.S

Washington, DC 20543-0001

Georgia Department of Law
40 Capitol Sq., SW

Atlanta, Georgia 30334

ATTN: S. H. Warren

-1300