No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

CHRISTOPHER L. JACKSON - *Petitioner*

VS.

STATE OF FLORIDA *Respondent(s)*

on

PETITION FOR A WRIT OF CERTIORARI

to

FIRST DISTRICT COURT OF APPEAL (FLORIDA)

PETITION FOR A WRIT OF CERTIORARI

CHRISTOPHER JACKSON
F.D.O.C. #N18286
BLACKWATER RIVER CORRECTIONAL FACILITY
5914 JEFF ATES ROAD
MILTON, FLORIDA 32583

QUESTION(S) PRESENTED

1. Whether secondary evidence discovered as a result of an illegal search and seizure can constitute proof against the victim of search, and does exclusionary prohibition extend to the indirect products of such invasion?

Wong Sun. v. United States, 371 U.S. 471 (1963)

2. Whether the exclusionary rule must be applied to all cases involving issues in the context of a Fourth Amendment violation when facts of case has established a violation of the Fourth Amendment occurred? California v. Minjares, 443 U.S. 916 (1979)

3. Whether an illegal arrest that lead to a warrantless search and evidence is discovered, can the illegally seized evidence be admissible to give probable cause to make the arrest valid after the Fourth and Fourteenth Amendments are violated?

Dunaway v. New York, 442 U.S. 200 (1979)

4. Whether independent review is an obligation for state appellate courts to maintain control of and to clarify the legal principles in question once the historical facts of case and law are established to determine whether the facts satisfy the relevant statutory or Constitutional standards when the rule of law as applied to the established facts is violated?

Ornelas v. United States, 517 U.S. 690 (1996)

5. Whether the Sixth Amendment provides Prison Release Reoffender (PRR) act must be submitted to a jury and found beyond a reasonable doubt to increase the mandatory minimum sentence? Alleyne v. United States, 133 S.Ct. 2151(2013)

LIST OF PARTIES

1. Angela C. Dempsey, trial judge

2. Candice Kaye Brower, Counsel for Appellate

3. Kaitlin Weiss, Assistant Attorney General for Appelle

4. Melissa Joy Ford, Counsel for Appellant

5. Pamela Jo Bondi, Attorney General for Appelle

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IN THE
SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari 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.

[X] For cases from **State Courts:**

The opinion of the highest State Court to review the merits appears at Appendix M to the petition and is;
[ ] reported at _____: or,
[X] has been designated for publication but is not yet reported; or,
[ ] is unpublished.

The opinion of the Florida First District Appeal Court appears at Appendix F to this petition and is;
[X] reported at Jackson v. State, 2018 WL 114403, (Fla. 1st DCA February 19, 2018; or,
[ ] has been designated for publication but is not yet reported; or,
[ ] is unpublished.

JURISDICTION

[ ] For cases from **Federal Courts:**

The date on which the United States Court of Appeals decided my case was _____, 20___.

[ ] 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____.
[ ] 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 7/3/18 A copy of that decision appears at Appendix M.

[X] A timely petition for rehearing was thereafter denied on the following date July 3, 2018, a copy of the order denying rehearing appears at Appendix M .
[ ] 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

1. Fourth Amendment: Constitutional Amendment guaranteeing the right of persons to be secure in their homes and property from unreasonable searches and seizures and consisting of the following elements, (1) the issuance of a warrant upon oath or affirmation. (2) Upon probable cause, as determined by a neutral and detached magistrate, and (3) particularly describing the place to be searched and the items or persons to be seized. The Fourth Amendment is most frequently encountered in cases involving the use of illegally seized evidence, or fruits of the poisonous tree, and is applied to the exclusionary rule. It was initially incorporated in the Bill of Rights to counter the abuses form searches conducted without warrants, with general warrants, or with writs of assistance and designed to safeguard the publics legitimate or reasonable expectation of privacy.

2. Fourteenth Amendment : Civil War Amendment to the Constitution in that it was ratified after the Civil war to protect all person from state laws that attempt to deprive them of life, liberty, and property, without due process of law, or attempt to deny them of equal protection of the law. The Amendment is used to extend the protection of almost all of the provision of the Bill of Rights to citizens of every state.

3. Exclusionary Rule: a constitutional rule of law that provides that otherwise admissible evidence may not be used in a criminal trial if it was obtained as a result of illegal police conduct.

4. Fruit of the poisonous tree doctrine: A rule under which evidence that is the direct result of illegal conduct on the part of an official is inadmissible in a criminal trial against the victim of the conduct. The doctrine draws its name from the idea that once the tree is poisoned the primary evidence is illegally obtained, then the fruit of the tree any secondary evidence is likewise tainted and may also not be used.

STATEMENT OF THE CASE

The Petitioner and two others broke into a home and allegedly held the home's five occupants at gunpoint. The three assailants forced the victims into a bathroom and took turns holding them while the others collected valuables. The Petitioner later claimed one of the victims had shorted him on some marijuana in a recent drug transaction. He admitted he only broke into the house but insisted he only intended to take back the marijuana that was owed to him. the Petitioner claimed the other assailants independently took the other items. Among the stolen items was an iphone, so police quickly looked to the "find my iphone" application to track the assailants without a warrant. Armed with real-time tracking and the description the victims provided, officers broadcast a be-on-the-lookout alert. An officer quickly identified a few cars in the same area as the stolen iphone, traveling in the same direction as the stolen phone, and spotted a vehicle containing people matching the assailants descriptions. The officer activated the patrol car lights, and conducted an investigatory stop on the vehicle after waiting for backup, the officer conducted a felony traffic stop on the incident being a robbery involving a firearm. All three occupants including the Petitioner, were then removed from the vehicle. All three occupants were then placed into custody of Officer Newhouse's patrol car. No arrests were made at that time. The officers then conducted a "safety security sweep". During the sweep the officer saw noting in plain view or any

evidence that would give the officer's probable cause to make an valid arrest. During the sweep, the officer opened the trunk, in the trunk the officers found a large quantity of marijuana in ziplock bags with vacuum seals. In addition, Officer Newhouse found the victim's brown Nike duffle bag in the trunk. The bag contained more large quantities of marijuana, a brown Thompson 1911 firearm, a playstation 3, and various DVDs and power cards. Her decision to open the trunk under which (she testified) "officers always open the trunks of vehicles during felony traffic stops to make sure there's no other occupants are in the vehicle or in the trunk." Plainly her decision to open the trunk was the beginning of a warrantless search in violation of the Fourth Amendment.

After the trunk was opened officers called for the victims to be transported from the crime scene to the traffic stop location to perform a show-up identification in which the Petitioner and another make passenger was identified as participants in the Robbery, so the officers continued to detain those two and searched the cars passenger compartment a second time and found more fruits of the crime taken during the robbery. The officers landed the second search to be incident to arrest. The Petitioner and the other male individual were then read Miranda warnings and taken to the police station for further investigations. The state charged the Petitioner with burglary of a dwelling with person assaulted, aggravated assault with a firearm, marijuana possession, and possession of a

firearm by a convicted felon, and four counts of Armed Robbery. The Petitioner adopted his co-defendants two motion to suppress during pre-trial proceedings. The first motion sought to suppress the evidence found in the trunk before the show-up identification and second search of the passenger compartment, See Appendix A. The second motion sought to suppress the evidence found during the second search which was result of the trunk search, which the show-up identification, statements, and arrest were included, See Appendix C. The trial court granted the first motion to suppress August 13, 2014, See Appendix B holding it was not convinced with the officers testimony of (the plus-one) rule actually exist and that the officer was simply trying to find a reason to justify a warrantless search of an area that she had absolutely no reason to believe contained another individual, and that it was ludicrous to believe that individuals committing a robbery would place another individual in the trunk of a car, expressly stating "it would have been easy for the officer to impound the vehicle after detaining the defendants, and it would have been equally easy to obtain a search warrant for the trunk after detaining the occupants, severing the passenger compartment search from the search of the trunk. The trial court also held, the states argument that the evidence should nevertheless be admitted into evidence under the inevitable discovery rule was rejected based on testimony from office to the events leading to the discovery of the evidence. Explicitly, stating that "without the evidence from

the trunk there was no basis to continue to detain in the individuals, because the officers searched the car after handcuffing the individuals and found no evidence to give them probable cause to make and valid arrest. Then they searched the trunk and found evidence illegally. Holding the illegally seized evidence cannot be used as a basis for the arrest or justify the illegal search, and without that evidence from the trunk, there was no basis to continue to detain the individuals and the show-up would not been permissible." There was no support for the search of the trunk and the evidence found therein was excused as illegally seized materials of an unlawful search. Consequently, in the second suppression hearing the state mislead the court to believe it could exclude the fact the Petitioner Fourth Amendment Rights were violated, and to conclude the officers were justified in detaining the Petitioner and co-defendant to conduct the show-up identification and that the second search was not result of the initial unlawful search of the trunk, but was incident to arrest. The trial court erred in denying the second motion to suppress the secondary evidence as "Fruit of the Poisonous Tree". The decision was inconsistent and arbitrary to the findings in the first motion to suppress and sanctioned a manifest constitutional error. The state moved to only dismiss the marijuana charges, and possession of a firearm by a convicted felon, and the remaining counts proceeded to trial. The jury convicted the Petitioner of Burglary of a Dwelling, Aggravated Assault with a Firearm, and two counts of Armed Robbery. At sentencing the state found that the

Petitioner had committed the crimes within three years of being released from prison and that the Petitioner therefore qualified to be sentenced under the (PRR) act. Accordingly, the court sentenced the Petitioner to concurrent life sentences with a ten-year mandatory minimum in each of the Armed Robbery counts, fifteen years prison for the burglary of a dwelling, and five years prison with a three year mandatory minimum for the Aggravated Assault with a Firearm. The Petitioners first argument on direct appeal was that the trial court erred in not suppressing the secondary evidence as fruits of the poisonous tree. The Petitioner argued that without the evidence found in the trunk, there was no basis to search the vehicle a second time. Arguing the search of the trunk (which the trial court found illegal) was the poisonous tree, and everything later found in the car was the fruit of that poisonous tree. Preliminarily, much of the Petitioner's argument on the Fourth Amendment issues focuses on the trial court's conclusion that the officers illegally searched the trunk. The Petitioner insists that the trial court's rulings from that point. Obligated it to suppress any and all evidence and statements that were the result of the illegal search and seizure. But for the officer's illegal search of the trunk, there was not a legal basis for the secondary search of the vehicle, and the subsequent show-up, arrest, and statements made would not have occurred. The evidence is therefore "Fruit of the Poisonous Tree" and should have also been suppressed. However, on direct review in the first District Court of Appeals

(Florida), See Appendix F. The panel held, "the trial court's rulings and order suppressing evidence from the trunk was not before the panel to presume the correctness of those conclusions in the second motion. And made its decision on the Petitioner's direct review based on excluding the fact the Petitioner's Fourth Amendment Rights were affirmed to have been violated. Only deciding to review the issues in the second suppression in its own right as if the Fourth Amendment was not previously violated which lead to the second motion. The Petitioner argues the Appellate Court reviewing his direct appeal had an independent obligation to review the mixed questions of law and fact that ultimately determine constitutional issues de novo. Considering the issues were in the context of the Fourth Amendment of the United States Constitution. Applying that exclusionary rule to Fourth Amendment issues, were a violation has been established after facts and law have been previously applied. The Petitioner also argued on direct review that because his eligibility for sentencing under the (PRR) act was not found by the jury at trail beyond a reasonable doubt. His heightened sentence violated his Sixth Amendment rights. The Petitioner argued that any facts that increased the statutory maximum sentence, other than the fact of á prior conviction, must be found by a jury or admitted by the Defendant. In the Petitioner's case the state increased the minimum sentence not the jury beyond a reasonable doubt which is a violation of the Petitioner's Sixth Amendment also. After the opinion was filed February 19,

2018, See Appendix F. the Petitioner also filed for a rehearing en banc March 5, 2018, which was denied on March 29, 2018, See Appendix G, the Petitioner also filed a motion of certification a conflict between districts March 8, 2018, See Appendix H, which was also denied March 29, 2018, See Appendix I. After the denial of those motions in the First District Court of Appeal (Florida), the Petitioner filed a motion to invoke Discretionary Jurisdiction to the Supreme Court of Florida. The motion was timely and submitted, which the Supreme Court of Florida issued an acknowledgement of new case to the Petitioner April 24, 2018, See Appendix J. The Petitioner filed a jurisdictional brief on the merits, See Appendix K and the respondent made an response to the brief June 11, 2018, See Appendix L. The Supreme Court of Florida neglected to review the written opinion filed by the First District Court of Appeal (Florida) on the Fourth Amendment issues July 3, 2018, See Appendix M. Wherefore, the Petitioner in efforts to exhaust all remedies filed this petition for writ of certiorari to this honorable United States Supreme Court to review the manifest constitutional errors in the State of Florida Courts. Because the Florida Court of Appeals in the First District of Florida has decided an important question of Federal Law by written opinion that has not been, but should be settled by this honorable court, and has decided an important federal question by written opinion in a way that conflicts with relevant decisions of this honorable United States Supreme Court.

REASONS FOR GRANTING THE PETITION

The Petitioner asserts the grounds for this petition for Writ of Certiorari is legally sufficient on its constitutional merits, and this Honorable United States Supreme Court should invoke its powers to maintain the uniformity of law and facts with relevant decisions of this court. The decision by written opinion in the First District Court of Appeals (Florida), are in fact inconsistent and arbitrary to important federal questions in a way that conflicts with previous relevant decisions of this court. Preliminarily, this petition for writ of certiorari is focused on the rulings in the trial court August 13, 2014 on the motion to suppress illegally seized evidence obtained during a protective sweep. See Appendix B, the Petitioner adopted his co-defendant two motions to suppress evidence. The first motion sought to suppress the evidence found in the trunk before the show-up identification, See Appendix A. The second motion sought to suppress the evidence found in the second passenger compartment search which the state mislead the court to believe was incident to arrest. See Appendix – C. The purpose of a protective sweep is to check for possible accomplices, not evidence; protective sweeps are confined to situations where the police have reasonable grounds to believe that their security may be jeopardized by others on the premises. A protective sweep, aimed at protecting the arresting officer, may be conducted only

when the officer possesses a reasonable belief based on specific and articulable facts that the area to be swept harbors an individual posing danger to those on the arrest scene. See Maryland v. Buie, 494 U.S. 325, 334 (1990). Police are authorized to search a vehicle incident to arrest "only when the arrestee is unsecured and within reaching distance of the passenger compartment at the time of the search, or if it is reasonable to believe that evidence relevant to the crime of arrest might be found in the vehicle." See: Arizona v. Gant, 556 U.S. 332, 339 (2009). Search incident to arrest cannot be argued because the officers merely secured the Petitioner, and no arrest were made prior to the search. Therefore, it cannot be argued that the officer believed evidence from the robbery to arrest could be found. No threat to the officer's safety was present. Officer Newhouse testified that no evidence from the crime was discovered in the initial search of the passenger compartment that would give an officer probable cause to arrest as she testified under oath that she saw nothing in plain view, and also went on to state in her incident report that the trunk was opened during " a safety security sweep". However, there was no fear of violence that would call for a protective sweep. The Petitioner and other passengers were cooperative and was immediately placed into a patrol car. In addition, the officer stated no specific articulable facts indicating that there was an "individual posing danger to those on the arrest scene". See Buie, 494 U.S. at 334. The protective sweep of the trunk was established to be unlawful

by order August 13, 2014. See Appendix - B, and any evidence found in the trunk of the car and after the trunk search should be excluded as fruit of the poisonous tree. However, in the second motion to suppress hearing the trial court made a decision advocate to the state and allowed the secondary evidence to be admissible at the Petitioner's trial, which was inconsistent and arbitrary to the first suppression rulings. If the State failed to prove such a search and seizure was reasonable under constitutional standards, any evidence obtained either directly or indirectly must be excluded. See Wong Sun v. United States, 371 U.S. 471, 488 (1963). Evidence obtained as a result of an unlawful search must be suppressed under the "Fruit of the Poisonous Tree" doctrine. See Id. when the encounter is an investigatory stop, it must "be temporary and last no longer than is necessary to effectuate the purpose of the stop, the investigative methods employed should be the least intrusive means reasonably available to verify or dispel the officer's suspicion. See: United States v. Mendenhall, 446 U.S. 544, 554 (1980). Also See: Florida Statue 901.151 Stop and Frisk Law. The Fourth Amendment requires legal 'seizures' of a person to be based upon reasonable, objective justification, usually expressed in Fourth Amendment jurisprudence as a reasonable articulable suspicion that the individual seized is engaged in criminal activity. In this case, the Petitioner adopted the co-defendant's first and second motions to suppress. The first motion to suppress argued that the warrantless and nonconsensual search of the trunk violated the

Petitioner's Fourth Amendment constitutional rights. The second motion to suppress relied on the trial court's ruling in the first motion to suppress. In which the trial court suppressed evidence found in the trunk of the car; holding, the officers searched the car after handcuffing the defendants and found no evidence, then they searched the trunk illegally and found evidence, this illegally seized evidence cannot be used as a basis for the arrest or to justify that illegal search. If the search had not already been done illegally. However, without the evidence from the trunk, there was no basis to detain the individuals and the show-up might never have occurred. There is no support for the search of the trunk, and all evidence seized there from should be excluded. This fact pattern is not what was contemplated by the Eleventh Circuit in Timmons to allow this search to stand would stretch the very fabric of the Constitution to the breaking point. Citing United States v. Timmons, 741 F.3d 1170 (2013), See Appendix B. Because the officers initially conducted a protective search of the car, finding no evidence, and then conducted a protective search of the trunk, locating evidence in the form of a firearm and a Nike Duffel bag containing 19, 860 grams of marijuana and 8,064 grams of a controlled substance without prescription. The victims were then transported to the scene and identified the two male occupants, after the show-up identification, officers search the car a second time and located another firearm, the victim wallet, and the victim's cell phone. The trial court rejected the officer's

testimony that the trunk was searched for officers safety because another occupant could be hiding in the trunk. Because no evidence was initially found in the vehicle, the trial court found that the officers acted unreasonable in continuing to detain the occupants and searching the trunk, and therefore the evidence found in the trunk had to be suppressed under the "Fruit of the Poisonous Tree" doctrine, See Appendix B. The second motion to suppress made the same argument as the first, that the identification of the defendants, arrest and the subsequent interviews of the defendants were tainted in exactly the same way as the evidence found in the trunk because "the events occurred in quick succession" without an intervening or independent act" to purge the taint of illegal police activity." Had the officers not illegally obtained evidence from the trunk, they would not have had a basis to detain the defendants, and the show-up and second search would not have occurred, See Appendix C. also See Dunaway v. New York, 442 U.S. 200 (1979). This court held that, (1) the police violated the Fourth and Fourteenth Amendments of the Federal Constitution when without probable cause to arrest, they took an individual into custody, transported him to the police station, and detained him there for interrogation. The detention for custodial interrogation intruding so severely on interest protected by the Fourth Amendment as to trigger the traditional safeguards against illegal arrest, and (2) the incriminating evidence given to the police during the illegal detention was not admissible at the

individuals criminal trial, since under appropriate Fourth Amendment analysis, which takes into account as factors the temporal proximity of an illegal arrest and confession, the presence of intervening circumstance and the purpose and flagrance of the official misconduct, no intervening event broke the connection between the individuals illegal detention and the incriminating statements, and the giving of Miranda warnings did not render such connection sufficiently attenuated to permit use of the evidence at trial. Basic principles of justice required the trial court to rule the same way when presented with the same questions of law based on the same facts. The police had no justification to search the trunk and should have obtained a warrant or allowed the Petitioner to leave. Inexplicably, without reversing the original ruling, the trial court later found in the second motion to suppress hearing, taken the states opinion that even though the officers had already conducted an illegal search, they still had the legal right to search the car a second time without a warrant, without consent, and to detain the Petitioner until a show-up identification could be conducted. The trial judge found that allowing the warrantless search of the trunk "to stand would stretch the very fabric of the Constitution to the breaking point." The same judge then evaluated the same facts and the same arguments, yet reached the opposite conclusion while expressly declining to reverse the ruling in the first motion. Based on these facts, on direct appeal the First District Court of Appeals (Florida), on review should have

independently reviewed the mixed questions of law and fact that ultimately determine constitutional issues arising in the context of the Fourth Amendment, See See Appendix F. As this court explained, judicial review in search and seizure cases requires more than unquestioning acceptance of trial court determinations. See Ornelas v. United States, 517 U.S. 690, 696, 119 (1996). Once the historical facts are admitted or established, and the rule of law is undisputed, the issue is whether the facts satisfy the relevant statutory or constitutional standard, or whether the rules of law as applied to the established facts is or is not violated. This court has never expressly deferred to a trial court's determination because a policy of sweeping deference would permit the Fourth Amendment incidence to turn on whether different trial judges draw general conclusion that the facts are sufficient or insufficient to constitute probable cause or consent, and such varied results would be inconsistent with the idea of a unitary system of law which in this case, is unacceptable. The trial court's findings of fact in the second motion to suppress would apply equally to the first motion to suppress. Similarly, the trial court's findings in the first motion to suppress were fruits of the same tree. The same facts and the same laws applied to both motions to suppress. The same judge heard both motions, and denying the second motion to suppress after granting the first motion was in fact arbitrary and inconsistent, and therefore unjust resulting in an Manifest Constitutional error by the trial court. Thus, the trial court erred when

it denied the second motion to suppress, and this court should reverse the judgments and sentences and remand for a new trial or anything this court deems just and equitable. Because the First District Court of Appeal (Florida), did not review the constitutional issues de novo under direct review, this court should apply the "exclusionary rule". See California v. Minjares, 443 U.S. 916 (1979), also See: Mapp v. Ohio, 367 U.S. 643 (1961), this court held that the Fourteenth Amendment did incorporate the exclusionary rule and therefore adherence to that rule by the states was mandatory, concluding that the exclusionary rule represented the only feasible means of enforcing the Fourth Amendment. The Petitioner also assert that this court should grant certiorari to review the ultimate question on whether the PRR statue requires certain finding of fact to impose PRR sanctions. The PRR portion in this case is un-constitutional. See Alleyene v. United States, 133 S.Ct. 2151 (2013), this court held that facts which increase the mandatory minimum sentence are elements of the crime which "must' be submitted to the jury and found beyond a reasonable doubt. In the Petitioner's case, the trial court made the PRR factual findings by a preponderance of the evidence. The trial court's factual findings altered the prescribed range of sentence from 129.3 months to Life in prison under the Criminal Punishment Code, to a mandatory term of life in prison. This was contrary to Alleyne which requires that these findings be made by a jury and found beyond a reasonable doubt. The jury in the Petitioner's case

made no findings regarding the date of his charged offenses. The trial court found by preponderance of the evidence that the crimes were committed on February 12, 2013, just ten day short of the three-year deadline for the PRR sentencing to apply. Alleyne requires the jury must find beyond a reasonable doubt that the crimes were committed before the three-year deadline expired. It is possible the jury found the Petitioner guilty of the armed robberies but believe they occurred on a later date than the date found by the trial court. Thus, these findings were insufficient to satisfy the Alleyene requirement that "any facts that increase the mandatory minimum sentence for an offense must be submitted to the jury and found beyond a reasonable doubt", See Appendix O. The First District Court of Appeal (Florida), has found that Alleyne does not require a jury to determine the date of the Petitioner's release from prison because the "key fact pertinent to PRR sentencing is whether the Petitioner committed the charged offense within three years of release from prison is not an ingredient of the charged offense. Rather, it relates to the fact of a prior conviction." See Appendix F. For these reasons, the Petitioner requests this court to grant this petition for a Writ of Certiorari in the United States Supreme Court to review the merits in the Petitioner's case involving constitutional issues. In context of the Fourth, Fourteenth, and Sixth Amendments.

CONCLUSION

This Petition for a Writ of Certiorari should be granted.

Respectfully submitted,

/s/ Christopher Jackson

Christopher Jackson

Date: 9/25/18