

NO.: _____

**IN THE
SUPREME COURT OF THE UNITED STATES**

David Michael Jones - Petitioner;

v.

State of Indiana Respondent;

PETITION FOR WRIT OF CERTIORARI

*ON Petition For A Writ of Certiorari
To the Court of Appeals of Indiana*

Attorney for Petitioner:

David Michael Jones

DOC# 850168

Pendleton Correctional Facility
4490 West Reformatory Road
Pendleton, IN 46064-9001

Petitioner / *pro se*

QUESTIONS PRESENTED

1. Is a State Courts reliance on Lange-U-California
594US, 295 clearly erroneous and violation of the
informants salient facts but such facts are not
corroborated by law enforcement when the entry
at issue is made? Also is informant's credibility
2. A per-se rule under Lange-U-California
as Indiana Appellate Court has stated also
is a informant's words considered to be
exigent circumstances as the Indiana
3. Court of Appeals has stated just because
officers believe the informant is telling
the truth

LIST OF PARTIES

- ☒ 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:

STATE OF INDIANA

PAM BONDI
ATTORNEY GENERAL U.S.
950 PENNSYLVANIA AVE.
N.W. ROOM 5614
WASHINGTON D.C.

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**IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI**

The Petitioner respectfully prays that this Honorable Court issue 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 reporter; 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☐ is unpublished.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 reporter; or,
☐ is unpublished.

☐ For cases from **state courts**:

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

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reporter; or,
☒ is unpublished.

The opinion of the INDIANA Supreme court appears at Appendix B to the petition and is-

- ☐ reported at 243 N.E. 3d, 1088; or,
☐ has been designated for publication but is not yet reporter; or,
☒ is unpublished.

JURISDICTION

☐ For cases from **federal courts**:

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

☐ 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: _____, 20____, 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 _____, 20____, on _____, 20____, in Application No. ___, and a copy of the order granting said extension appears at Appendix _____.

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 August 19, 2024
A copy of that decision appears at Appendix A.

☒ No petition for rehearing was timely filed in my case.

☐ A timely petition for rehearing was denied on the following date: December 5, 2024 and a copy of the order denying rehearing appears at Appendix B.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____, 20____, on _____, 20____, in Application No. ___, and a copy of the order granting said extension appears at Appendix _____.

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

CONSTITUTIONAL PROVISIONS AND STATUTES

Constitution of the United States Amendment
IV search and seizure in Home All person
shall have the rights to be safe and secure
in there Homes without government interference
without first obtaining a WARRANT to enter the
Home or permission from the Home owner
to enter first.

STATEMENT OF THE CASE

on July 10, 2020 the state charged David Michael Jones with dealing in methamphetamine, other drug related offenses and resisting law enforcement (App. Vol II pp. 124-128)

on November 17, 2020 Jones filed motion to suppress evidence (App. Vol II pp. 189-90) on February 18, 2021 Jones supplemented his motion to suppress based upon new information and discovery provided by the state (App. Vol III pp. 120-22)

After amending the charges the state eventually tried Jones following a multi day hearing and brief on the motion to suppress the trial Court issued its order denying defendants motion to suppress on January 10, 2022 (App. Vol. IV p. 130-42)

After amending the charges the state eventually tried Jones on June 12, 2023. on the following counts (Count I) dealing in methamphetamine a Level 2 Felony

Statement of THE CASE

(Count II possession of methamphetamine a Level 3 Felony; (Count III Resisting Law enforcement a Level 6 Felony and (Count IV possession of controlled substance (Alprazolam) a class A misdemeanor (App. Vol. XI p. 117 TR. Vol p. 27 - Vol. III p. 5.

At the close of the evidence the jury returned guilty verdicts on all four Counts. (TR. Vol. III p. 180-81 App. Vol. XI pp. 133-36) The judge entered judgement of conviction for Count I, Count III and Count IV (App. p. 20 - TR. Vol. III p. 203)

on July 14, 2023 the judge sentenced Jones to 30 + thirty years ~~IN~~carcerated for dealing methamphetamine as level 2 Felony (App. Vol. XII p. 20) The judge ordered the shorter sentences for the Lower Level

Statement of The Case

offenses served concurrently (App. Vol. XII p. 20) The judge entered a amended sentencing order on July 17, 2023 to correct a citation to the Indiana Code (App. Vol. XII p. 26).

Jones Filed his notice to appeal on August 11, 2023 (App. Vol. XII p. 31. docket) The Clerk Filed a notice of completion of Clerk's Record on September 2, 2023, (App. Vol. XII p. 34 docket)

The Clerk Filed the notice of completion of transcripts on October 24, 2023 (App. Vol. XII p. 39) His Brief was due on February 12, 2024

on August 19, 2024 the Indiana Court of appeals affirmed the trial Courts decision see, Appendix A

State ment of THE CASE

notime during the Motion to Suppress evidence Hearings Before trial or At the trial did the State prove any exigent circumstances to the Home without First getting a WARRANT to enter the police never talked to PLAINTIFF Jones or ASK him For permission to enter the Home or they never even told Jones why they At the Home they just arrested him on his porch For Fleeing the Police then talked to DANNY Roland who was in the Home they never ASK Roland For permission to enter the Home As they were talking to him at the front door of the Home or did they ever tell Roland why they were there they just ASK Roland if A Female was in the Home they never ASK ABOUT Amanda BURK personally Being in the Home. on December 5, 2024 the Indiana Supreme Court denied transfer see Appendix

B That on July 9, 2020 the Anderson Police went to the Madison County Jail to talk to Inmate Courtney LANDAKER who told officers she thought Jones maybe holding BURK AS

Hostage in his Home. At the jail officers were told BURK was on escape from work release with this information from Courtney Landaker the officer went to prosecutor Steven Koester see appendix C page 25 who told the officers Landaker was not a credible informant to go do a knock and announce on the Home. As officer arrived at the Home and arrested Jones for fleeing officer Frazier after arresting Jones just opened the door without any warrant or exigent circumstances and entered the Home yelling for Amanda Burk with several other officers, BURK was arrested for her warrants taken to police station where she told officers and Kid talk supervisor she was not Hostage didn't even know any Courtney Landaker other officers claimed they went into the Home to arrest BURK as officer Cole claims see appendix C page 28 see also appendix C page 29 where BURK told officers she was not being held against her will. At trial Landaker admitted she had made the

hole story up and lied to the police about BUCK
and Jones The officers violated Jones 4th amend
ment Rights to United States Constitution by entering
his home without WARRANT or permission or any
exigent circumstances see Appendix C were
there were no exigent circumstances proven at
motion to Suppress Hearings or at trial page 46
police had time to secure a WARRANT before entering
the Home once they entered Home illegally
they saw scales on coffee table the had the
drug task Force get a search WARRANT to search
the Home thus violating Jones Constitutional
Rights to 4th amendment to U.S. Constitutional
officers lacked any exigent circumstances to
enter the Home see United States - U - Rodriguez
- Pachero 948 F.3d. 1 Footnote (9) also Samboy
433 F.3d. at 158 exigent circumstances apply
once officers arrive at the scene the Home
not before they arrive Based on Landlady's
words a crime is happening in the Home.
officers did not corroborate any thing
Landlady told them But the fact BUCK WAS

in escape from work release and photos of Jones and Burk which were not exigent circumstances to enter the Home by police see Payton-V-New York 455 U.S. 573 unless a warrant is obtained or any exigency exists any physical entry INVASION of the structure of the Home even by an INCH is too much see Briley 940 F.3d. at 1302 quoting Kyllo-V-United States 533 U.S. 27 Payton stands for police need of probable cause plus exigent circumstances to enter the Home even to arrest BURK see United States-V-Belton 917 F.2d. 641 (for the proposition that no exigent circumstances exist when police fully expect that they may have to enter to make an arrest) Here officers knew BURK had warrants on her for escape as officer Cole stated see appendix C page 28 & the officer were told by prosecutor Koester her warrants weren't enough for him to give them a search warrant see appendix C page 24, 25 That exigent circumstances

were just not there see also Store-U-Samboy
433 F.3d. 154 (quoting probable cause cannot
be based on conclusory statements or
mere suspicion, rumor or strong reason to
suspect wrongdoing United States-U-Vigant
176 F.3d. 569 (quoting United States-U-HAN
74 F.3d. 537 (uncorroborated tips are
insufficient to provide a reasonable
basis for entry in to persons Home) Here
Landaker words alone are not probable
cause or exigent circumstances to enter Jones
Home by police exigent circumstances should
be supported by particularized case by case
specific facts not simply generalized words
of an unreliable informant Landaker
see Strumb 749 NE2d. at 598 It is
then imperative that Courts hold the
prosecutor not the Indiana Court of Appeals
as here see appendix A page 10 to this
Burdon Here the Indiana Court of Appeals
applied its own exigent circumstances

Second which is more practical Reason than an application of Law if officers reasonably Belief exigent circumstances existed that Belief is usually reflected in the evidence not the Appoint Courts Per-se Rules regardless of whether a defendant does or does not challenge the purposed exigency of the circumstances The Indiana Appoint Courts see Appendix A pp. 11 stating that Landakers credibility was all officers needed to enter Jones Home is misplaced. They the officers needed corroboration of Landakers words see United States-U-Gibson 928 F.2d. 250 Also United States-U-Mendonso 989 F.2d. 366 (quoting the cases rightly insisted upon substantial independent police corroboration because of the absence of any kind of indicia of the informants reliability as here in Jones case see State-U-Weaver 99 F.3d. 1372 (Informants tip veracity or reliability

Based on Knowledge ARE all highly relevant
A mere Ratification of Bare Bone Conclusions
Are ~~Insufficient~~ See Gates-U-Illinois
462 U.S. at 239 (Facts that Informant
was known and reliable is not enough by
itself to provide basis that someone is
engaged in criminal activity) Here Landaker
was not known for her credibility moreless
that there was any criminal activity going
on in Jones Home. see United States-U-
McNatt 931 F.2d. 251 (Probable Cause alone
is not enough to justify a warrantless search
of a home It must be joined with exigent
circumstances see Cudworth-U-State 818
NE 2d. 133 Also Nance-U-State 216 NE
3d. 464 see Arizona-U-Hicks 480 U.S.
321 (dwelling place search not less than
a dwelling place seizure requires probable
Cause also United States-U-Tobin 923
F.2d. 1506 (Reasonable Suspicion cannot
justify a warrantless search of Home.)

Here the Indiana Appellate Court relied on its own per-se rule of exigent circumstances they justified as Landowners credibility to justify the officers coming into Jones home is misplaced and this Court should look at this matter to justify the appellants Court of Indianas Holdings of Lange-U-California 594 U.S. 295 which that standard generally requires the obtaining of a judicial warrant before a law enforcement officer can enter a home see appendix A page 10

II This Court should grant the petition also because Indiana has no per-se rule were the Indiana Court of appeals herein appendix A can rely on its own per-se rules to justify the law enforcement to enter Jones home at first to see any paraphernalia to later get a warrant to search the home in violation of 4th. amendment

to the United States Constitution Here the
Indiana Appellant Court Ruling Appendix
A relied on sole Landraker words to
justify the Police to initially enter Jones
Home this is not classified as any exigent
circumstances that has been relied and
relied upon by any other Court in
Indiana or the United States appeals Courts
any were in the United States the record
thus does not provide this Court or the
Indiana Appellant Courts with adequate
framework that can be taken into account
in determining whether a warrant is
required see Missouri - U - McNeeley
569 U.S. 141 the State and Amici
in support of a per-se Rule are un-
persuasive their concern that a case by
case approach to exigency will not provide
adequate guidance to law enforcement

officers to make desire a Bright-Line Rule under standable but the 4th. Amendment will not tolerate adoption of an overly broad categorical approach in this context a fact intensive totality of circumstances approach is hardly unique within Courts 4th. Amendment jurisprudence see e.g. *Illinois-V-Wardlow* 528 U.S. 119 *Inquire* *Ohio-V-Robinette* 519 U.S. 33 demands the Court evaluate each case of alleged exigency based on its own facts and circumstances *Go BART Importing Co. -V- United States* 282 U.S. 344 Here the *Indiana app/Int Court* did not do that But made its own *Per-se* Rule of Landmark words to justify Police entering Jones Home.

REASONS FOR GRANTING THE WRIT

I. The Indiana Appellant Court Relayed upon an Informant's credibility only without any corroboration or of the prosecutors proving any exigent circumstances at motion to suppress hearings or at trial the Indiana Appellant Court on direct appeal made its own PER-SE Rule to establish the credibility of the Informant, justifying the Police action in just entering Home without warrant or permission violating the 4th Amendment to the United States Constitution

The state Appellant Court Reliance on Large-U-California 594 U.S. 295 is misplaced and clearly erroneous and a violation of the 4th Amendment when its findings based upon corroboration

of salient facts but such facts are not corroborated by law enforcement when the entry was made. Also the Appellant Court on direct appeal made a per-se Rule that allowed police to believe a confidential informant's story of the events they told police to get the police to enter the home without a warrant violating the 4th Amendment to enter homes without any search warrants or the state to prove its burden of any police exigent circumstances to enter the home without any type of warrant. The state must prove exigent circumstances to enter a home without a warrant see Bailey 940 F.3d at 1302 quoting Ryllo - U - United States 533 U.S. 27. The state here at Jones Motion to Suppress hereby and at trial never meet its burden under the exigent circumstances the police must

Also proof it is a situation on the scene
on the ground when the police came to
the home its a now or never situation
emergency to enter the home before
they have time to get a warrant to
enter Michigan-U-Tyler 436 U.S. 499
quoting also Riley 573 U.S. at 391 and
McNeeley 569 U.S. at 149 Here officers
came to Jones home to do a knock
and announce based upon a jail House
Informant Courtney Landaker in jail
who told officers on July 9, 2020
that she thought Jones maybe holding
his girl friend Amanda Buck hostage
on his home when officers arrived
they chased Jones a block to his home
on his motorcycle tazed him on his
porch saw the door was open to the
home only the screen door shut

as they looked into the home saw a man inside name Danny Roland ASK Roland if a Female was inside the home never ask possibly about Buck just a Female period when Roland said he dont know the officers not liking his answer just opened the door and stepped inside yelling for Buck She come to officers then was arrested for her warrants for escape from work release Jones was never charged with holding her hostage. officers cannot simply act and then claim their actions were justified by exigent circumstances or the appellate Court in this case ruling on a per se Rule the officers actions were justified just based upon Landers words not corrected at the scene

AS OFFICERS NEVER EVEN KNEW IF A FEMALE
MORE LESS BURK WAS IN THE HOME BEFORE
THEY ENTERED AND ACTED JUST ON LANDAKER'S
WORDS SEE HARKLESS - U - STATE 577 NE 2d.
245 AND HAWKINS - U - STATE 626 NE 2d.
436 ESPECIALLY HERE WHERE NO OFFICER DID
TESTIFY AT ALL AT THE MOTION TO SUPPRESS
HEARINGS OR TRIAL TO ANY EXIGENT
CIRCUMSTANCES TO ENTER THE HOME. OR
ANY NOW OR NEVER EMERGENCY TO ENTER
THE HOME TO CHECK ON BURK. JUST PLAIN
CONCLUSIONARY, BARE BONES ASSERTION OF
LANDAKER OR CORROBORATION ANY CRIME
WAS AT FOOT IN THE HOME UNITED STATES - U -
WEAVER 99 F.3d. 1372 THAT PROBABLE
CAUSE CANNOT BE BASED UPON CONCLUSIONARY
STATEMENTS OR MERE SUSPICION, RUMOR,
OR STRONG REASON TO SUSPECT WRONGDOING
IN JONES HOME SEE UNITED STATES - U -
VIGORANT 176 F.3d. 569 QUOTING UNITED

State-U- HAN 74 F.3d.537 that
uncorroborated tips are often insufficient
to provide a reasonable basis to enter a home
that exigent circumstances should be
supported by particularized case specific
facts not simply generalized suppositions
about the behavior of a particularized
class of criminal suspects See United
States-U- Sambo 433 F.3d.154
Here police did not like Rolands answers
to their questions is not good enough
to just enter the home. Probable Cause
alone is not enough to justify a warrant
less entry of Home It must be joined
by exigent circumstances to dispense
with the warrant requirement see
Cudworth-U- State 818 Fed. 133
also Vance-U- State 216 F.3d.464

See also Arizona-U-Hicks 480 U.S. 321
(advertising place search requires probable
cause) United States-U-Tabin 923 F.2d
1506 (reasonable suspicion cannot justify
a warrantless search of home) Here the
police only acted upon knowledge and
not corroborated to enter Jones Home
which is only reasonable suspicion and
not even probable cause even probable
cause is not enough alone if must be
joined with exigent circumstances
see Straub 749 U.S. at 598 It
is imperative that courts hold the
prosecutor accountable to meet its burden
of proof of exigent circumstances regardless
of what defendant does or doesn't do
at trial if police believe they have
exigent circumstance to enter home that
should be evidence at trial see dee
-U-State 967 U.S. 529

II The Indiana Court of Appeals
in Appendix A are making a Per-se
Rule that Violates citizens and here
Jones constitutional Rights Under the
4th amendment to the United States
Constitution to be safe and secure
in there homes from entrance of
Law Enforcement and Informants
who make Police do as Informants
want the Police to do that these unreliable
confidential Informants can tell the
Law Enforcement a story uncorroborated
By Police and have the Police just
raid and enter Homes of citizens
Based upon Informants words with
out any evidence at all of what
story they tell the Police is true in
violation of 4th Constitution of the

United States as Here was dan that Courtney
Londaker told police as she was being held
in jail for weeks prior to July 9, 2020
that Jones was holding his girl friend
Amanda Buck hostage in his home
prosecutor Steven Roester of the
Madison County prosecutor office in
Anderson, Indiana told these police
officers that Londakers credibility
was no good but the police went against
prosecutor Roester's advice and went to
Jones home and just opened his door
without any search warrant or any
exigent circumstances and violated his
4th amendment Constitutional Rights and
the Indiana Court of appeals see
Appendix A stated and well aware
rule that this was ok that Londakers
words were enough to violate the
4th. amendment Constitution Rights of

Home owner Jones based solely on Landaker's words to Police that this Court should grant the Petition for Writ of Habeas Corpus to Rescind and to set forth whether and under what circumstances an Informant's Credibility is good enough for Police to violate citizens Constitutional Rights under the 4th Amendment to allow Police to enter homes without warrants based upon Informant's tip alone, as here Independent corroboration is lacking see Allen 168 F. 3d. at 302 That any Illegal activity or Probable Cause or Exigent Circumstances was never proven it was largely pre-fabricated Boilerplate supposedly encouraging the lack of specificity already complained of which was Buck being held hostage in the Home Landaker

credibility unsupported was not enough
For police to enter Home to Look For
Buck see State-U-Reddick 90 F.
3d. 1276 (7th Cir. 1996) also that
substantial independent Police Corroboration
must be met because the absence of
any kind of indicia of the Informants
Reliability and emphasized the
need for corroboration in those kind
of circumstances For Police to enter
A Home see United States-U-Mendoza
989 F.2d. 366 also United States-U-
Gibson 928 F.2d. 250 and Gates-U-
Illinois 462 U.S. at 239 Under the Police
created exigency doctrine Lower Courts have
developed as an exception to the exigent
circumstances Rule exigent circumstances
do not justify a warrant less search
when the exigency was created by the

Police or manufactured by the conduct
of Police see Mincey-U-ARIZONA 437
U.S. 385 Here the police created the
exigency to enter Jones home just
based solely on Landowners words not
corroborated that she BUCK was even
in the Home or that a crime was even
being committed in the Home therefore
this Court should except jurisdiction
to hash out these issue of the Indiana
appellate Court's Per-Se Rule of
allowing Police to violate a Homeowner's
Constitutional Rights based solely on
an Confidential unreliable Informant
such as Landowner herein. That the
Indiana Court of appeals see Appendix A
page 11 states exigent circumstances is
officers belief Jones was holding BUCK
Hostage based on tip that said tip
is not considered to exigent circumstances

Alone to allow police to claim or the State
and Indiana Appellant Court to agree
this is considered exigent circumstances
to allow Police to enter a citizens home as
such here in Jones case that an Informant's
words alone or period are not considered
to be per-se Rule to call them Exigent
Circumstances and no court in the
United States Court has ruled that an
Informant's words alone are to be
considered Exigent Circumstances to
allow Police to enter a Home without
a warrant if so any citizen could run
have on there enemy and just tell
Police any story or that someone as
was down here is holding someone hostage
in a home even people in jail as was
down here could run have down on
Innocent Citizens and cause Police
to raid Homes without warrants.

CONCLUSION

The petition for a writ of certiorari should be granted.

Executed on: MARCH, 31, 025

Respectfully submitted,

David Michael Jones

Petitioner / *pro se*

David Michael Jones
4490 W, Reformatory Rd.
Pendleton, Indiana
46064