No. 25-____

In the Supreme Court of the United States

PATRICK FRANKLIN HARRIS,

Petitioner,

v.

RICARDO R. CARTER,

Respondents.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the First Circuit

PETITION FOR A WRIT OF CERTIORARI

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September 2, 2025
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QUESTIONS PRESENTED

1. Is the 28 U.S.C. § 2255 process effective when the impartiality of the habeas court and appellate have been disrupted so significantly that they cannot perform their tasks without bias or prejudice?

2. Is a petition under 28 U.S.C. § 2241 available for relief when the sentencing court shows through the misapplication of law and abuse of discretion the inability to perform its tasks without bias or prejudice and the appellate sanctions the sentencing courts conduct?

LIST OF PROCEEDINGS

DIRECT PROCEEDINGS BELOW

U.S. Court of Appeals for the First Circuit

No. 24-1955

Patrick Franklin Harris, *Petitioner-Appellant* v.
Ricardo R. Carter, *Respondent-Appellee*

Final Judgment: June 9, 2025

U.S. District Court for the District of Massachusetts

No. 24-10496

Patrick Franklin Harris v. Ricardo R. Carter

Final Order: August 19, 2024

RELATED PROCEEDINGS

U.S. Court of Appeals for the Sixth Circuit

No. 23-5963

Patrick Harris, *Petitioner-Appellant* v.
United States of America, *Respondent-Appellee*

Order Denying
Petition for Panel Rehearing: October 11, 2024

Judgement and Order Denying Motion for a
Certificate of Appealability (COA): October 12, 2024

U.S. Court of Appeals for the Sixth Circuit

No. 23-5768

In re: Patrick Harris, *Petitioner*

Order Dismissing Mandamus: June 24, 2024

U.S. District Court for The Western District of Tennessee

No. 2:20-cv-02728

Patrick Franklin Harris, *Movant* v.
United States of America, *Respondent.*

Order Denying Motion
Pursuant to 28 U.S.C. § 2255: July 31, 2023

Order Denying Motion for Relief: October 5, 2023

U.S. Court of Appeals for the Sixth Circuit

No. 18-5521

United States of America, *Plaintiff-Appellee* v.
Patrick Harris, *Defendant-Appellant*

Date of Final Judgment: October 11, 2019

U.S. District Court for The Western District of Tennessee

2:17-CR-20268

United States of America v. Patrick Harris, *Defendant*

Final Judgment: July 7, 2018

U.S. Supreme Court

No. 19-7918

Patrick Harris v. United States

Date of Cert. Denied: April 20, 2020

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OPINIONS BELOW

The Opinion of the United States Court of Appeals for the First Circuit, was issued on June 9, 2025. App.1a. The Order of Dismissal of the U.S. District Court for the District of Massachusetts was issued on August 19, 2024. App.3a. These opinions and orders were not designated for publication.

JURISDICTION

The judgment of the court of appeals was entered on June 9, 2025. App.1a. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

STATUTES AND JUDICIAL RULES

The relevant statutes and judicial rules are set forth at App.58a-60a.

- 28 U.S.C. § 2241
- 28 U.S.C. § 2242
- 28 U.S.C. § 2255
- Fed. R. Civ. P. 11
- Fed. R. Civ. P. 15

STATEMENT OF THE CASE

Following the denial of the petitioner's 28 U.S.C. § 2255 motion in Western District of Tennessee (2:20-cv-02728) he filed a motion under 28 U.S.C. § 2241 in the District of Massachusetts. The petitioner argued § 2255(e) allowed a petition under § 2241 where the sentencing court had waived jurisdiction and denied access to the courts when denying two motions because "his conviction would be vacated and thus additional motions attacking his plea are not necessary" (2:20-cv-02728 ECF No, 35 at PageID 240). Where the petitioner claimed it impractical to obtain relief in a court where impartiality has been disrupted so significantly that it cannot perform its tasks without bias or prejudice.

Given recent appellate court rulings in the context of § 2255(e), the savings clause is exclusively limited to retroactive changes in law, The plain reading of the statute and case law have diverged significantly. Common sense suggests; Congress envisioned a situation where the sentencing court would be unable to objectively review its own work and intended a path for disinterested review, when required to address unusual bias or prejudice.

As the district and appellate courts apply § 2255(e) today, a federal inmate cannot be assured of one full and fair opportunity to obtain habeas relief as intended by the Constitution, the Court and Congress under the AEDPA framework.

Excluding the safety valve of § 2255 as the pathway to one full and fair opportunity of habeas

relief is contrary to the text of the statute. *Colautti v. Franklin*, 439 U.S. 379, 392 (1979) ("[A] statute should be interpreted so as not to render one part inoperative.").

CASE HISTORY

An FBI investigation originating in Pittsburg, Pennsylvania lead to the fabrication of probable cause for a search warrant by an FBI agent in Memphis, Tennessee. The agent then leads a search of the petitioners residence. Two years later the petitioner was indicted on a single count of possessing CSAM. The indictment was followed by prosecutorial misconduct and ineffective assistance of counsel designed to cover up the FBI's agents unlawful actions and obtain a guilty plea through misinformation and coercion.

The petitioner plead guilty and was sentenced to 80 months imprisonment followed by five years of supervised release. Near the end of his term of imprisonment the sentencing court denied his motion under 28 U.S.C. § 2255. The habeas court, through an abuse of judicial discretion and misapplication of law denied all viable claims within the petitioner 2255 motion on procedural grounds.

Shortly after the denial of his § 2255 motion the petitioner was transferred to a Residential Reentry Center (RRC) in Boston, Massachusetts. After arrival at the RRC he filed a timely motion for a COA in the Sixth Circuit after the motion for COA in the Sixth

Circuit was denied, he filled a petition for panel re-hearing.

Following the denial of panel rehiring, (*Patrick Harris v. United States* No. 23-5963, Court of Appeals for the Sixth Circuit) his right to a full and fair ruling on the merits of habeas petition under 28 U.S.C. § 2255 ended. The sole remaining path to a ruling on the merits of his habeas claims was to invoke the savings clause of § 2255(e) and file for relief under 28 U.S.C. § 2241.

The petitioner filled for relief under 28 U.S.C. § 2241, Claiming it was impossible or impractical to seek relief by filing a second § 2255 motion in the sentencing court when seeking adjudication on the merits of claims previously denied on procedural grounds. (No 24-10496, U.S. District Court for the District Of Massachusetts)

The petitioners' § 2241 motion was denied by the District of Massachusetts and affirmed by First Circuit (No 24-1955, U.S. Court of Appeals for the First Circuit) (. Judgment entered June 9, 2025). Leading to the present Petition for a Writ of Certiorari taken from the petitioners appeal of his § 2241 motion in the First Circuit.

A. Abuse of Discretion and Misapplication of Law by the Sentencing Court.

The sentencing court dismissed the petitioner's § 2255 motion with prejudice through abuse of discretion and misapplication of law as follows: Characterized the petitioner's amendment as matter of course as a reply and denied all claims within the amendment on procedural grounds without giving notice. Denied motions to amend 'because his conviction would be

vacated and thus additional motions attacking his plea are not necessary', without giving notice. Ruled an evidentiary hearing was unnecessary because the petitioners claims could not be believed. Ruled discovery was unnecessary because *Tollett* precluded *Brady* claims and the government's withholding of discovery was non prejudicial. Ruled the petitioner had a full and fair opportunity to litigate the suppression issue prior to trial based solely on trial counsel's affidavit. Would not address the petitioner's clearly stated claim of an involuntary guilty plea, where the Rule 11 colloquy shows the court had not inquired into the voluntary nature of the plea.

B. Sentencing Court Actions Sanctioned by the Sixth Circuit.

The Sixth Circuit denied COA on all issues. In response to his motion for rehearing the appellate ruled.

> We have reviewed the petition and conclude that this court did not overlook or misapprehend any point of law or fact in denying Harris's application. Accordingly, the petition for rehearing is DENIED.

Case: 23-5963 Document: 9-1, Filed 10/11/2024.

C. Characterizing an Amendment as a Reply.

The petitioner filed his timely 2255 motion using form AO 243 on September 21, 2020. Then, following Instruction 5 on form AO 243.

> Answer all the questions. You do not need to cite law. You may submit additional pages if necessary. If you do not fill out the form

> properly, you will be asked to submit additional or correct information . . .

Form AO 243.

After filing his motion, the petitioner wrote a 12 page summary of what transpired preceding and following his conviction and placed it in the prison mail on November 8, 2020, 11 days after the Government's response of October 27, 2020. On receipt, the sentencing court characterized the submission as a 'reply'.

> Harris's Reply includes lengthy factual allegations that appear to present new claims. (ECF No. 7 at PageID 72-83.) However, an amendment must be presented in a pleading on the official form, accompanied by a motion seeking leave to amend. It is not proper to present new claims in a Reply to which the Government has no right to respond. Therefore, the Court will not consider Harris's allegations

2:20-cv-02728 at PageID 234.

> In his Reply, Harris argues that the failure to present these issues prior to the guilty plea was due to the ineffective assistance of trial counsel. (ECF No. 7 at PageID 86.) However, the § 2255 Motion raises no such claim, and he may not raise new arguments in a reply.

2:20-cv-02728 at PageID 246.

A 2255 petitioner is permitted to an amendment as a matter of course. Civ. P. 15(a)(1) within 21 days of the Government's response. Regarding amending

petitions in habeas cases, 28 U.S.C. § 2242 specifically provides that habeas applications "may be amended . . . as provided in the rules of procedure applicable to civil actions." *United States v. Pittman,* 209 F.3d 314, 317 (4th Cir. 2000). *Ramirez v. County of San Bernardino*, 806 F.3d 1002, 1007 (9th Cir. 2015). "[W]e note that district courts should not lightly dismiss pro-se complaints with prejudice and without leave to amend when the plaintiff has "an arguable claim." *Brown v. Matauszak*, 415 F.App'x 608, 614-15 (6th Cir. 2011).

The sentencing court characterizing ECF No. 7 as a 'Reply' followed by dismissal of arguable claims with prejudice and without leave to amend was an error of law, in opposition to binding circuit precedence, and an abuse of discretion.

D. Denial of Subsequent Amendments.

> The final three motions filed by Harris are a Motion to Find Lack of Probable Cause, a Motion to Set Aside Guilty Plea, and an Amended Motion to Set Aside Guilty Plea. (ECF Nos. 28, 31 & 30.) None of these motions are appropriate. If the Court were to grant relief on Harris's habeas claims, his conviction would be vacated and thus additional motions attacking his plea are not necessary. These motions are DENIED.

2:20-cv-02728 ECR No 35 at PageID 240

> The movant should not be barred from an appropriate remedy because he has misstyled his motion" (*United States v. Morgan,* 346 U.S. 502, 505 (1954). "a habeas petition submitted during the pendency of an initial

> § 2255 motion should be construed as a motion to amend the initial motion.

Clark, 764 F.3d 6th Circuit 2014 (quoting *Ching,* 298 F.3d at 175).

Within one of the denied motions (ECF No 28) the petitioner extends his claim of counsel preventing ligation of his Fourth Amendment claim.

> While continuing his legal research Harris became aware of the 'Four Corners of the page' method of determining the validity of an Affidavit in Support of Search Warrant along with the 'Savings Clause'. [Leon] [Brown]. Having viewed the Warrant in new light, Harris determined the Warrant Application failed to establish a nexus between the location being searched and the evidence used to establish probable cause for the search. [and] concluded the Warrant issued by the Magistrate, dated April 3, 2015, is facially invalid per the four corners test.

2:20-cv-02728 at Page ID 206.

> In February of 2014 SA Simpson reviewed files from an undefined source. Nine months later Det Erdley obtained an undefined set of files from Harris' IP address. No rational trier of fact could establish a nexus between the files reviewed by SA Simpson and the files obtained from Harris's IP address.

2:20-cv-02728 ECF No 28 at Page ID 208.

Where the four corners claim relates back to "The date shown in paragraphs 15 and 16 of the

warrant are about 2 months before Harris opened his AT&T account" (2:20-cv-02728 ECF 1 at PageID 4) Where in counsel's affidavit (2:20-cv-02728 ECF No 6-1 at PageID 40) provided as part of the Government's response includes:

> Counsel advised Mr. Harris that in his opinion, the subpoena, the Search Warrant, and the Affidavit in Support, were legally sufficient and a challenge would not result in suppression

Both prongs of *Strickland* are satisfied. The first being no competent counsel would, after being advised of facial defect in the search warrant, declare the warrant to be legally sufficient. And second, the absence of discovery supporting the factual bases of the warrant shows the outcome may have different had council challenged the search warrant.

E Denial of Evidentiary Hearing.

> 1.1 A Neighbors (Nl) use of Harris' AT&T account lead the FBI to a set of pornographic pictures taken of a boy at an airport. 1.2 The government withheld: N1's IRC chat history, when and how the airport pictures were obtained, the pictures and metadata . . . .
>
> 1.5 The government produced no evidence of the case as outlined within page 18 of the change of plea transcript.

2:20-cv-02728 ECF No 1 at PageID 5.

"It is Counsel's understanding that the photo of the boy did lead to the investigation of Mr. Harris." 2:20-cv-02728 at PageID 38. "As indicated in conversations with the AUSA and agents on the case . . . a

separate and unrelated online investigation . . . was underway." 2:20-cv-02728 at PageID 39. "Counsel is not aware of any information being withheld from Mr. Harris." 2:20-cv-02728 at PageID 39. "Harris brought up discovery, counsel told Harris if he wanted discovery, he would need a new attorney." 2:20-cv-02728 at PageID 7. "Counsel does not recall ever telling Mr. Harris if he wanted discovery, he would have to get another lawyer. That does not sound like something I would say." 2:20-cv-02728 at PageID 44.

> [W]hen a defendant presents an affidavit containing a factual narrative of the events that is neither contradicted by the record nor inherently incredible and the government offers nothing more than contrary representations to contradict it, the defendant is entitled to an evidentiary hearing.

Pola v. United States, 778 F.3d 525, 532 (6th Cir. 2015).

An evidentiary hearing "is required unless the record conclusively shows that the petitioner is entitled to no relief." *Campbell v. United States*, 686 F.3d 353, 357 (6th Cir. 2012) (quoting *Arredondo v. United States*, 178 F.3d 778, 782 (6th Cir. 1999)); *see also* 28 U.S.C. § 2255(b). The burden "for establishing an entitlement to an evidentiary hearing is relatively light," and "[w]here there is a factual dispute, the habeas court must hold an evidentiary hearing to determine the truth of the petitioner's claims." *Turner v. United States,* 183 F.3d 474, 477 (6th Cir. 1999).

The sentencing courts denial of an evidentiary hearing as to counsel's withholding information about the case from the petitioner and refusing to obtain

discovery was an error of law and evidence of bias against the petitioner.

F. Denial of Discovery.

> However, as will be discussed infra, Claims 1 through 3, which involve allegations of a neighbor's access to Harris's internet network. ..and various alleged Fourth Amendment violations, such as alleged fabrications in the FBI's reports, are not cognizable in a § 2255 motion, rendering discovery unnecessary

2:20-cv-02728 at PageID 237.

> *Giglio and Bagley* are consistent with the tenet on which the *Brady* doctrine is based, that it is fundamentally unfair for the government to achieve a conviction through the concealment of evidence which undermines the strength of the government's case against the defendant

Strickler v. Greene, 527 U.S. 263 (1999).

The sentencing courts blanket statement of discovery being unnecessary fails in each of the following three areas. "Ground one is a claim of prosecutorial misconduct, aggravated by ineffective counsel". 2:20-cv-02728 at PageID 85.

> Had Detective Erdely collected files from Harris's AT&T account, he would have documented the same for use as evidence. Absent evidence of distribution, two years later the government used the information to indict Harris for possession. As the information did not support distribution, it stands to reason that Detective Erdely did not

> collect files from Harris' home network. Extending the logic one step further indicates the Collierville Search warrant was not sought because of an investigation by Detective Erdley. This logic is supported by the fact that of the two names on the AT&T subpoena, Detective Erdely is not one of them. That fact is, all signs point to the foundation of the Collierville search warrant, the Detective Erdley scenario as being a hoax, a ruse foisted on the court to obtain a search warrant without disclosing the true nature of the government's investigation.

2:20-cv-02728 at PageID 73.

> By entering an unconditional guilty plea, Harris waived all constitutional claims that predated his guilty plea except insofar as his plea was motivated by the ineffective assistance of counsel. *Tollett v. Henderson*, 411 U.S. 258, 266-67 (1973)

2:20-cv-02728 PageID 243

> . . . . under limited circumstances a guilty plea may be deemed involuntary if entered without knowledge of information withheld by the prosecution.

Campbell v. Marshall, 769 F.2d 314, 321 (6th Cir. 1985).

If able to show the application for search warrant was based on an investigation that had not occurred, the petitioner may argue fabrication of probable cause is one of those limited circumstances where a

Brady violation crosses the threshold established by the 6th circuit in *Campbell*.

A similar argument applies to the petitioners ineffective assistance of counsel claim, to know if counsels conduct meets the prejudicial prong of *Strickland*. One must know if counsel's advice was meritorious.

Where counsel states "In my opinion a Motion to Suppress would not be productive or successful." 2:20-cv-02728 at PageID 243.

In the third instance, discovery is needed to know if the sentencing courts Rule 11(b) error was prejudicial.

> An essential element of this motion is the court having not made a specific inquiry with respect to coercion during the change of plea hearing. [Rule 11(b)] [Fuentes-Galvez]. Recent rulings require the totality of circumstances be addressed when deciding the voluntary nature of a guilty plea.

2:20-cv-02728 at PageID 215.

> In order to determine whether petitioner is entitled to conduct discovery on this claim, the Court initially must identify the essential elements of his claims.

Brady, 520 U.S. at 904.

Rule 6's "good cause" standard requires petitioner to at least attempt to identify what he expects to uncover through his discovery requests. (*Williams v. Bagley*, 380 F.3d at 976). Where the petitioner has stated what he expects to uncover and the facts

needed to fully develop his claim for relief, " . . . it is the duty of the court to provide the necessary facilities and procedures for an adequate inquiry." *Brady*, 520 U.S. at 909, "[W]hile specific allegations are required, the movant need not show that he would prevail on the merits of his claim before receiving discovery." *Stouffer v. Reynolds*, 168 F.3d 1155, 1173 (10th Cir. 1999).

Based on settled law the sentencing court's decision to deny discovery shows an unusual level of bias against the petitioner and bias in favor of the government, trial counsel and the sentencing court.

G. Involuntary Guilty Plea.

Where factual bases for the petitioners Involuntary Guilty Plea claim is "[T]he trial judge's acceptance of petitioner's guilty plea absent an affirmative showing that the plea was intelligent and voluntary." *Boykin v. Alabama*, 395 U.S. 238 (1969).

The petitioner used a definition for an Involuntary Guilty Plea (IGP) in. "Ground Four: 4.0 Counsel failed to advise Harris of his legal rights and coerced him to plead guilty". (2:20-cv-02728 at PageID 7).

> 4.1 Harris knew the affidavit in support (of the search warrant) was unsupported by evidence and included false statements as did the FD-302 . . . 4.2 Harris brought up discovery, counsel told Harris if he wanted discovery he would need a new attorney. To Harris. getting another attorney and discovery in a few days was impossible.

2:20-cv-02728 at PageID 7.

> For good cause shown, the Motion for Leave to Amend [ECF 10] is GRANTED insofar as Harris clarifies his original claim.

2:20-cv-02728 PageID 236.

Where the petitioners Motion for Leave to Amend [ECF 10] further clarified his claim of Involuntary Guilty Plea (IGP), as relates back to Ground Four.

> On December 12, 2017, a few days before the date set for a change of plea hearing. A hearing where Harris's was advised that he had to either plead guilty or go to trial. Mr. Massey told Harris a) That if he insisted on obtaining the discovery needed to challenge the search warrant, he would need to obtain a new attorney. b) If Harris sought a new attorney. he should expect the government to produce a superseding indictment containing additional charges. At that moment Harris decided he had no other choice but to plead guilty and advised Mr. Massey of the same. Mr. Massey then brought Ms. McClusky into his office and told Harris that she would handle his case going forward. Harris now asks the court to find that Mr. Massey's actions on December 14, 2017, constituted coercion to plead guilty, rendering his guilty plea involuntary.

2:20-cv-02728 at PageID 120.

> When entering the court on December 18, 2017, Harris believed his coerced decision to plead guilty absent a plea agreement would put him in the same legal position as having been found guilty by a jury. Ms.

> McClusky assured Harris that the government would use the evidence collected with the search warrant, and on seeing the evidence they would find him guilty. At no time did McClusky or Massey tell Harris that by pleading guilty he would lose the ability to challenge the search warrant on appeal. There is no evidence in the record of Harris having been advised of the full consequences of pleading guilty vs. being found guilty by a jury. Based on the facts, Harris now requests the court to find that his guilty plea was uninformed and thus invalid.

2:20-cv-02728 at PageID 120.

When the petitioner presents his claim. "[I]n clear and simple language such that the district court may not misunderstand it." *Dupree v. Warden,* 715 F.3d 1295, 1299 (11th Cir. 2013), The court is obligated to rule on the merits of his claim. In an abuse of discretion, of the sentencing court disregarded the petitioners claim of an Involuntary Guilty Plea.

REASONS FOR GRANTING THE PETITION

As explained by Google AI:

> An effective habeas corpus is crucial for upholding individual liberties and ensuring government accountability. It acts as a safeguard against unlawful detention and arbitrary imprisonment by requiring the government to justify the reasons for holding someone in custody. This legal mechanism ensures that individuals have recourse to challenge their detention before a judge, protecting against potential abuses of power by the executive branch.

The petitioner alleges an executive branch employee, an FBI Agent, obtained a search warrant based on a falsified affidavit for search warrant, where the same agent then used the unlawfully obtained warrant to personally lead a search of petitioner residence and confiscated of family possessions. Two years later rather than admit to an error, the government indicted the petitioner based entirely on evidence obtained during the unlawful search.

The petitioner further alleges trial council cooperated with the government with the intent of protecting the FBI agent and the government by misinforming the petitioner about the viability of search warrant and coercing him into pleading guilty. Following his conviction, appeal and motion for certiorari, the petitioner filed a motion under 28 U.S.C. § 2255 where he presented the sentencing court with evidence in support of his habeas claims. The senten-

cing court abused its discretion, misapplied case law and declared the petitioner not entitled to relief where an absence of law supporting the reasons for denial prevailed. On review the sentencing appellate concluded the sentencing court's habeas decision was proper.

The petitioner claiming the § 2255 process was ineffective filed a motion under 28 U.S.C. § 2241 hoping to find relief in an impartial court. However, the § 2241 court claimed it was bound by settled law. Thus, preventing consideration of unadjudicated habeas claims after having been presented to and denied by the sentencing court on erroneous procedural grounds. The § 2241 appellate concurred when granting summary dismissal of the petitioners § 2241 appeal leading the present petition for relief.

Given the current state of law, the sole path to a disinterested review of a federal prisoners habeas claims is that of praying for the seldom granted writ of certiorari. For this reason, the petitioner prays the court will grant his petition and in doing so provide a path to full and fair consideration of his habeas claims as intended by congress when drafting AEDPA statute.

CONCLUSION

The text of the § 2255 safety valve statute provides a path to impartial adjudication when needed. "[A] statute should be interpreted so as not to render one part inoperative." (*Colautti v. Franklin*)

The petitioner has shown unfair bias within the sentencing court's habeas decision, followed by the concurrence of the appellate. The petitioner suggests a potential resolution of his petition includes having the court characterize his petition as that of an original habeas petition, where "I would welcome the invocation of this Court's original habeas jurisdiction in a future case where [***4] the petitioner may have meritorious § 2255 claims." *In re Bowe*, 144 S.Ct. 1170.

Where claims within the present petition address the question of, 'may a claim be adjudicated on the merits after having been procedurally barred in an initial § 2255 proceeding?', the difference being in *Bowe* the context is a second § 2255 motion while within present petition the subsequent adjudication on the merits question occurs in a § 2241 setting after innovation of the savings clause.

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