

No. 25-5729

ORIGINAL

IN THE SUPREME COURT OF THE UNITED STATES

Supreme Court, U.S.
FILED

JUL 28 2025

OFFICE OF THE CLERK

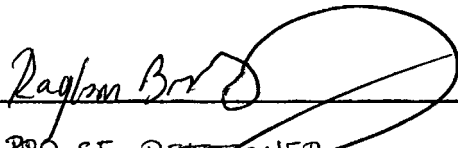
PETITIONER: RAYLON LEE BROWNING (PRO SE)

v.

RESPONDENT: STATE OF GEORGIA, FULTON COUNTY DISTRICT ATTORNEY

ON PETITION FOR WRIT OF CERTIORARI TO:
STATE OF GEORGIA, FULTON COUNTY SUPERIOR COURT, CASE NO. 17SC152674

PETITION FOR WRIT OF CERTIORARI



PRO SE PETITIONER
RAYLON LEE BROWNING
GDC No. 1151205
Hays State Prison
777 Underwood Dr.
Trion, GA 30753

II. MAIN QUESTIONS FOR REVIEW

1. The Trial courts deviation from and violation of the United States Constitution's V Amendment :

The Court deprived Browning of life & liberty, without a true & correct Indictment, through 8 years of illegal and oppressive pretrial incarceration without due process of law, in a case that never had a chance of being prosecuted from the beginning, based on 2 illegal arrest warrants, illegal arrest, 2 illegal search warrants, 99% of evidence being suppressable, a severely errored & quashable Indictment, and no witnesses to crimes that legally qualified. All of the issues were raised in motions. Also, 8 years of pretrial incarceration is illegal under the Federal Speedy Trial Act.

2. The Trial courts deviation from and violation of the United States Constitution's VI Amendment :

Browning asserted his guaranteed United States Constitution's VI Amendment Right to a Speedy trial, by serving to all parties & filing a notarized Constitutional Demand For Speedy Trial, with Certificates of service. The Court failed to Try Browning's case in 2 complete court terms. Browning is entitled to an Acquittal of all charges for failure to try a Demand For Speedy Trial. Browning was Pro Se, by default, at the time of the Demand For Speedy Trial. The Judge held a hearing on Browning's request to proceed Pro Se, several months before the Demand. ~~The Judge failed~~ There was supposed to be a follow up Foretta hearing, a few weeks later, to allow Browning to proceed Pro Se. The Judge failed to schedule and hold the Foretta hearing in the time limitations for Judges to decide motions, OCGA, 15-6-21, leaving Browning without counsel. ~~After~~ After several Judge Changes by the Court, the Court failed to honor the Acquittal for failure to Try.

3. The Trial courts deviation from and violation of the United States Constitution's VI Amendment :

The Right to Counsel or to proceed Pro Se. The trial court failed to allow Browning a change of Public Defender or to proceed Pro Se, after Browning filed several motions for both. The motions included several reasons for his Public Defender's Ineffective Assistance of counsel.

4. A conflict of the United States Constitution's VI Amendment & Georgia Supreme Court case law :

Johnson V. State, 315 Ga. 876 (2023) Browning contends that the above case law is not legitimate. If the above case law is actually legitimate, it allows Georgia Judges the

discretion to accept or deny Pro Se motions filed by a Defendant with assigned Counsel, which is in direct violation of the United States Constitution's VI Amendment. The Defendant has the Right to provide their own defense, file on their own behalf, and make all of the decisions in their own case, and Counsel is only for Assistance, not to be a master over the Defendant. The trial court denied Browning a motion to proceed Pro Se and 7 other motions that were applied correctly to Browning's case, which would have resulted in dismissals and ~~an~~ an Acquittal of all charges. The motions were denied, based on the above case law, because they were filed Pro Se. Browning's Public Defender would not assist him in any way, and the only way to ask to proceed Pro Se or apply the other motions, was Pro Se.

Browning was, also, denied a direct Appeal, based on the same case law. Browning expressed to Public Defender Richard Marks, on conviction day, that Browning wanted to directly Appeal, Pro Se, based on Public Defender Richard Marks Ineffective Assistance of Counsel and the trial court's failure to address motions that would have led to dismissals & Acquittals of all charges. Mr. Marks said he would schedule a Foretla hearing immediately after trial. ~~Mr. Marks~~ Browning knew Mr. Marks would fail to assist him. Browning ~~failed~~ filed a Pro Se Notice of Appeal. One day later, Public Defender Richard Marks filed a motion for new trial & motion to withdraw as Counsel.

III. LIST OF ALL IMPORTANT PRETRIAL & TRIAL ISSUES FOR REVIEW

The Pretrial issues : most of which would have resulted in Dismissals & an Acquittal of charges

1. The trial court held an illegal bench trial to determine competency of Browning, after Browning had already been determined competent to stand trial by the Georgia Department of Behavioral Health and Developmental Disabilities (DBHDD).
2. The trial court failed to appoint a new Public Defender or allow Browning to proceed Pro Se, after several requests, in motions, that stated several reasons for Browning's Public Defender providing Ineffective Assistance of Counsel.
3. The trial court failed to address a motion to quash a ~~severely~~ ^{severely} errored Indictment.

Errors of the Indictment include :

- The Indictment being unsigned by the District Attorney
 - The charging of 2 offenses in one count.
 - The charging of 2 counts of murder for one alleged victim : The District Attorney must choose which degree of murder that he can prove.
 - 4 illegal charges that do not apply to Browning's case.
 - 2 charges with victim's name is different than police reports.
 - 1 charge claiming an offense happened on the day after Browning's arrest & incarceration.
- Also, the victim's name & offense never appeared in police reports or Discovery.

4. The trial court failed to address a motion to suppress evidence.

- There were 2 illegal arrest warrants due to significant errors.
- The arrest was illegal, based on illegal arrest warrants, and there was illegal evidence obtained from illegal arrest.
- There were 2 illegal search warrants issued, with grounds for the search warrants being illegal arrest & evidence illegally obtained from the illegal arrest.
- There were surveillance videos that should have been suppressed.
 - In one, the video was so distorted, it created confusion as to what was being viewed.
 - Others were automated, and time and date can not be authenticated by a witness.

5. The trial court failed to address a motion to dismiss the case and all charges related to

- it, based on lack of evidence & witnesses, after suppressing evidence & quashing the Indictment.
6. The trial court failed to address a motion to Acquit charges for statute of limitations of prosecution.
~~7 of 9~~
7 of 9 charges should have been Acquitted due to Statute of limitations.
 7. A violation of the United States Constitution V Amendment: The trial court deprived Browning of life & liberty for 8 years of illegal & oppressive pretrial incarceration without a true & correct Indictment. Also, 8 years of pretrial incarceration is a Violation of the Federal Speedy Trial Act.
 8. A violation of the United States Constitution VI Amendment: Browning asserted his guaranteed Constitutional Right to a Speedy Trial, by serving to all parties & filing a notarized Constitutional Demand For Speedy Trial, with Certificates of service. The court failed to Try Browning's case in 2 complete Court terms. Browning is entitled to an Acquittal of all charges for failure to Try a Demand For Speedy Trial.
 9. The trial court held court hearings without the presence of Browning, after Browning had been determined Competent to stand trial by the Georgia Department of Behavioral Health & Developmental Disabilities. Due to Browning's absence from the court hearings, Browning can not properly defend himself. The damage caused by Browning's absence is irreversible, therefore the case must be dismissed with prejudice.
- Court hearings held in the absence of Browning:
 - 2.23.2023 Judge Scott McAffee
 - 2.2.2024 Judge Shukura Ingram
 - 2.23.2024 Judge Shukura Ingram
 - 3.4.2024 Judge Shukura Ingram
 - 3.24.2024 Judge Shukura Ingram

Browning raised the above pretrial issues, Several times, in motions.

The Trial issues: Trial errors and Public Defender Richard marks Ineffective Assistance of Counsel

1. Richard marks did not apply very basic law to Browning's Case. See Browning's 10.30.24

- motions that he did not apply on his own or at the request of Browning.
2. Richard marks never discussed the case with Browning, prepared for trial, or even informed Browning of a trial date.
 3. Richard marks only asked 1 or 2 questions to 2 potential jurors out of 44.
 4. Richard marks asked no questions to 13 of 20 witnesses. The others, he asked 1 or 2 questions with ridiculously obvious answers.
 5. Richard marks allowed witnesses to testify without basic information about them: names, addresses, current locations, dates of birth, telephone numbers, + social security numbers. The information is required by OCGA 17-16-8, which was applied.
 6. Richard marks allowed all witnesses to testify, without signed statements of what they would testify to, that is required by OCGA 17-16-7, which was applied.
 7. Richard marks allowed several witnesses to testify about information that they did not originally give to responding police. They originally gave extremely vague + contradicting statements, but in trial, 8 years later, gave very detailed accounts, and added excessive amounts of information.
 8. Richard marks allowed different victim witnesses to testify, than the names of the victims in police reports, arrest warrants, and original Indictment 17sc150985.
 9. Richard marks allowed several witnesses to identify Browning by surveillance stills that were too blurry to make a positive identification.
 10. Richard marks allowed District Attorney Gautam Rao to lead ~~at~~ almost all witnesses, constantly.
 11. Richard marks allowed witnesses to ramble for minutes instead of answering direct questions.
 12. Richard marks did not object to District Attorney Gautam Rao entering evidence of surveillance stills in closing statements. Also, evidence was entered in opening statements.
 13. Richard marks allowed testimony of victim witnesses, even though they were different people than the victims pictures from Grady Hospital.
 14. Richard marks allowed witnesses to open and handle evidence. The case must be dismissed based on contaminated evidence.

15. Richard marks allowed evidence to be entered that was not in the evidence section of the Discovery.
16. Richard marks allowed a witness to testify that a gun matched 3 bullet casings found at an alleged crime scene, without a report of it in Discovery. There was a report that they did not match.
17. Richard marks allowed District Attorney Gautam Rao to deliver his closing argument last.
18. Richard marks falsely stated, in closing arguments, that blood found on knife was from a human being, but there was no lab report to verify type of blood.
19. Richard marks allowed Judge Shukura Ingram to read Jury instructions that included descriptions of charges against Browning that were not accurate with OCGA title 16, and Jury instructions that only informed the Jury that their verdict had to be unanimous, and did not inform the Jury of the possibility of a hung Jury.
20. Richard marks and District Attorney Gautam Rao allowed the Jury to take pieces of evidence, a gun and a knife, into the Jury deliberation room, while deliberating. The case must be dismissed based on contaminated evidence.

IV LIST OF PARTIES RELATED TO THE CASE

CASE ORIGIN : State of Georgia, Fulton County Superior court, case No. 17sc152674

CASE LENGTH : 8 years of illegal pretrial incarceration. 4-4-2017 - 3-27-2025

PUBLIC DEFENDERS ASSIGNED TO CASE : Elizabeth markowitz, Richard marks

HEAD DISTRICT ATTORNEYS OVER CASE : Paul L. Howard Jr., Fani Willis

JUDGES ASSIGNED TO CASE : Henry Newkirk, Ural Glanville, Scott McAfee, Shukura Ingram

TRIAL JUDGE : Shukura Ingram

STATES TRIAL ATTORNEYS : LEAD: ADA Gautam Rao, ASSISTANTS: ADA Jasmine Dilligard, ADA Adam Abbate

TRIAL PUBLIC DEFENDERS : LEAD: Richard marks, ASSISTANTS: Nathaniel Horsely, Olivia Murray

DEFENDANT : RA Rayton Lee Browning

TRIAL DATES : 3-24-2025 - 3-27-2025

CONVICTION DATE : 3-27-2025

DIRECT NOTICE OF APPEAL FILED : 4-2-2025

ILLEGAL ORDER TO DISMISS APPEAL FILED : 5.6.2025 (will be discussed below)

DISCRETIONARY APPLICATION FOR APPEAL FILED WITH GEORGIA SUPREME COURT : 5.22.2025.

ILLEGAL DENIAL OF APPLICATION FOR APPEAL : 6.23.2025 (will be discussed below)

SUPREME COURT CASE NO. : S25D1159 ~~(Georgia)~~

RESPONDENT : State of Georgia, Fulton County, Assistant District Attorney Ruth Pawlak

JUSTICES : Peterson, Warren, Bethel, Ellington, McMillian, LaGrua, Colvin, Pinson

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VI TABLE OF AUTHORITIES

O.C.G.A. : 15-6-21 , 17-7-129 , 17-7-130 , 17-16-7 , 17-16-8

United States Constitution : IV Amendment , VII Amendment

Georgia Supreme Court case law : Johnson V. State, 315 Ga. 876 (2023)

more detail and citations in Brief

VII JURISDICTION

State of Georgia, Fulton County Superior Court, Criminal case 17sc152674

Conviction date : 3.27.2025

Notice of Appeal filed : 4.2.2025

Illegal order dismissing Appeal : 5.6.2025 (will be discussed below)

Discretionary Application for Appeal filed with Georgia Supreme Court : 5.22.2025

Illegal Denial of Application for Appeal : 6.23.2025 (will be discussed below)

VIII. STATEMENT OF CASE

- Browning is an innocent Defendant who was illegally convicted. The lack of content in the Discovery and amount of errors are proof of innocence.
- Browning was held in illegal and oppressive pretrial incarceration for 8 years, in a case that never had a chance at being prosecuted from the beginning, based on 2 illegal arrest warrants, illegal arrest, 2 illegal search warrants, 99% of evidence being suppressable, a severely errored and quashable Indictment, no witness to crimes that legally qualified, and no conclusive lab reports of evidence, before suppression.
- In 8 years of pretrial incarceration, Browning was assigned 2 Public Defenders, who both provided Ineffective Assistance of Counsel, by failing to assist Browning.
- Public Defender Elizabeth Markowitz was assigned to Browning's case immediately after arrest.

Arrest date 4.3.2017.

Ms. Markowitz filed pretrial motions at the beginning of the case, to suppress evidence based on illegal arrest and illegal search warrants, and she filed statutes and case law for an Indictment perfect in form & substance, but Ms. Markowitz failed to follow through with quashing the Indictment and suppressing evidence. At the time of arrest, Browning was admitted to Fulton County Jail's Psychiatric observation unit, but was considered stable about one month later. ~~Instead~~ Instead of suppressing evidence & having Browning released, Ms. Markowitz failed to assist Browning through 2.5 years of pretrial incarceration. When Browning fired Ms. Markowitz for failure to assist, she had Browning admitted to Georgia Department of Behavioral Health & Developmental Disabilities (DBHDD) for mental evaluation, without reason. Even if Browning was truly incompetent to stand trial, Ms. Markowitz should have had Browning admitted for mental evaluation within one or two months after arrest. Browning was determined competent to stand trial by Georgia DBHDD and returned to Fulton County in August of 2020. Ms. Markowitz failed to visit or assist Browning after the competency determination, and she failed to schedule hearings to further Browning's case & have him released. Browning fired Ms. Markowitz in November of 2020.

- Browning filed a motion to proceed Pro Se in November 2020, which the clerk did not file correctly, but Judge Henry Newkirk held a hearing on the issue on 11.30.2020. Judge Newkirk tried to force Counsel on Browning, but Browning was adamant about Pro Se representation, based on the case & lack thereof. Judge Newkirk said he would schedule a Faretta hearing a couple of weeks later, but failed to do so. Judge Newkirk failed to make a decision on the issue, within the time allotted by O.C.G.A. 15-6-21, leaving Browning Pro Se by default.
- Browning was ignored by the court, in all Pro Se attempts to further his case.
- On 3.1.21 Browning filed a United States Constitutional Demand For Speedy Trial. The court failed to try Browning's case in 2 complete court terms, resulting in the Right to Acquittal for failure to try.
- Browning filed a Demand for Acquittal on 7.12.2021.
- 2 weeks later the court changed the Judge to Ural Glanville. Judge Glanville held a status conference on 11.1.2021, to address the Demand For Acquittal. Before signing an Acquittal, Judge Glanville illegally ordered Browning for mental evaluation, without reason, in violation of O.C.G.A. 17-7-129. Browning refused evaluation by the court appointed Doctor, and Judge Glanville waited 2 more years before illegally ordering Browning to Georgia DBHDD for mental evaluation, without reason, in violation of O.C.G.A. 17-7-129. Browning was determined competent to stand trial, for the second time, in January of 2024.
- By January 2024, the court had assigned the 4th Judge in the case, Judge Shukura Ingram. Judge Ingram held Browning for several months before reordering Browning for mental evaluation, without reason, in violation of O.C.G.A. 17-7-129. Browning was determined competent to stand trial for the 3rd time, by Georgia DBHDD, in October 2024. On 10.30.2024, Browning filed 8 motions to address all of the pretrial issues with his case, for his return to court. Browning returned competent to stand trial on 11.25.2024. On 11.26.2024 Browning attended Judge Ingram's Conference Status. Judge Ingram, again, claimed Browning was incompetent to stand trial, after only one day return as competent to stand trial. On 11.26.2024, Judge Ingram signed an order to dismiss Browning's 8 motions filed on 10.30.2024. The order to dismiss the motions was based on Browning's "Incompetence to stand trial", but Browning

had just returned competent to stand trial one day before, and Browning never had any further treatment or evaluations before trial & conviction. Judge Ingram's 11.26.2024 order to dismiss motions was, also, based on case law: Johnson v. State, 315 Ga. 876 (2023), which allows Georgia Judges the discretion to accept or deny Pro Se motions by a counseled Defendant, which is a direct violation of the United States Constitution's VI Amendment. One of the 8 motions, was a motion to proceed Pro Se, due to Public Defender Richard Marks Ineffective Assistance of Counsel and failure to assist Browning in any way. There is no other way to ask the court to proceed Pro Se, except for a Pro Se motion. The other 7 motions applied correctly to Browning's case, and would have followed in Browning's Pro Se Status.

- To remind a little, Browning had asked for a second Public Defender in June 2022, after having no luck at progressing his case as a Pro Se Defendant, between November 2020 and June 2022. Browning was assigned Public Defender Richard Marks in July 2022. Browning met with Mr. Marks in mid July 2022. Browning tried to discuss the case and laws that applied, with Mr. Marks, but Marks was unwilling to discuss the case or assist Browning in any way. Browning immediately filed to proceed Pro Se again, but was ignored by the court, as usual. Marks failed to assist Browning in any way, over the next 3 years. Marks would make visits, but his visits were just for show and never lasted more than one minute. Marks would ~~never~~ never discuss the case, to avoid having to deny what was legally correct with Browning's case. In the 3 years that Marks was assigned to Browning's case, Browning filed numerous motions for new counsel or to proceed Pro Se, based on Marks Ineffective Assistance of Counsel, including a motion to chief Judge Ural Glanville. The court ignored Browning.

- Back to the 11.26.2024 Status Conference: Browning had returned competent to stand trial one day prior, and the court stated its intent to hold an illegal trial to determine competency of Browning, and if competent, to proceed to trial, ignoring Browning's Right to Suppression of evidence, quashing the Indictment, dismissal of charges for statute of limitations, and Acquittal of all charges for failure to try a Demand For Speedy Trial. The only time there is a trial to determine competency of a defendant, is when the Defense files a request for mental evaluation. Once Georgia DBHDD determines a Defendant Competent to stand trial, the

Defendant only returns to criminal trial. O.C.G.A. 17-7-130. The court ignored Browning until illegal competency trial on 3.5.2025 & 3.14.25. The court determined Browning competent to stand trial on 3.19.2025, and proceed to criminal trial on 3.24.2025, ignoring all of Browning's Rights, & Pretrial motions.

- Anytime Competency is in question, a case is on hold from all proceedings. Although Browning was determined competent to stand trial several times, the court held Browning for excessive amounts of time, without hearings or progression to his case, before reordering him for mental evaluation, without reason. Browning's case was on hold from the time of failure to try a Demand For Speedy Trial in July 2021 until 5 days before trial. The court proceeded to trial, by illegally maneuvering & ignoring all of the legal pretrial procedures that applied to Browning's case, that were supposed to be address, once Browning was determined Competent to stand trial. If the pretrial procedures were addressed, Browning's case would have been dismissed due to lack of evidence after suppression, failure to reindict after quashing the Indictment, dismissal of charges for Statute of limitations, and Acquitted for failure to try Demand For Speedy Trial.
- Public Defender Richard marks ^{provided} Ineffective Assistance of counsel by failing to assist Browning in any way during the pretrial stages of the case. During trial marks Ineffective Assistance of counsel & failure to provide a Defense at all, caused Browning to be illegally convicted of crimes he is not guilty of committing.
- On conviction day (3.27.2026), Browning expressed to marks, that Browning did not want a new trial, but wanted to directly Appeal Pro Se, based on marks Ineffective Assistance of counsel and the court ignoring all of Browning's Constitutional Rights and legal pretrial procedures that applied to Browning's case. marks said he would, immediately, schedule a Faretta hearing, so Browning could Appeal Pro Se. Browning knew marks would not assist him, or if so, would do it too late for an Appeal. Judge Shukura Ingram would not accept a motion to proceed Pro Se from Browning, so Browning filed a Notice of Appeal with the trial court on 4.2.2025, 6 days after trial, for a direct Appeal. One day later marks filed a motion for new trial, against Browning's wishes, and marks filed a motion to withdraw as counsel on the same day. Browning did not find out about marks filings

until late June²⁰²⁵ meanwhile Browning's Notice of Appeal was filed on 4.2.2025, and should have been sent to the Georgia Supreme Court by 5.3.2025. Judge Shukura Ingram waited until 5.6.2025 to sign an order to dismiss the Appeal. Judge Ingram's order was based on Johnson v. State, 315 Ga. 876 (2023): discretion to accept or deny motions by a counseled Defendant, which is a violation of United States Constitution VI Amendment.

Judge Ingram would not accept a pro se motion to proceed Pro Se, and there is no other way to ask the Court to proceed Pro Se, if your Public Defender will not assist, as was in Browning's case. Browning's only way to Appeal, was Pro Se.

- Browning received Judge Ingram's order to dismiss Appeal on 5.14.2025. Browning filed a discretionary Application for Appeal to the Georgia Supreme Court on 5.22.2025, which was wrongfully denied on 6.23.2025. Browning now Petitions for writ of certiorari.
- Browning, now, asks the ~~not~~ United States Supreme Court for relief from illegal conviction of an innocent Defendant.
- The above information is just a broad overview of 8 years of illegal pretrial incarceration. It is the tip of the iceberg, and can't begin to explain all of Browning's Violated Rights and broken laws by the court.

IX Attachments: Parts of record for review for Petition

Browning is only able to provide limited parts of the record. Due to Ineffective Assistance of Counsel, Browning was not ~~provided~~ provided with documents related to his case. Even with an Affidavit of Indigency, the trial court clerk would not provide all of Browning's requests for documents. Browning's Pro se motions included Certificates of service and were served to all parties.

Below are descriptions of the attachments provided for review for Petition.

Attachment 1

7.24.2017 Indictment 17sc152674 (7 pages).

In support of Petition

- Indictment is unsigned by District Attorney
- Count 2 charges 2 offenses in one count
- Count 1 and 2, 2 counts of murder for the same victim. D.A. must choose which to prove.
- 4 illegal charges that do not apply
 1. Count 2 Aggravated Assault does not apply if victim is allegedly shot & dies.
 2. Count 3 Aggravated Assault does not apply if victim is allegedly shot & dies.
 3. Count 4 weapons charge only applies with certain crimes & does not apply if the alleged crime is ~~stabbing~~ ^{murder} with the weapon.
 4. Count 8 weapons charge only applies with certain crimes & does not apply if the alleged crime is stabbing with the weapon.
- 2 charges with victim's name is different than police reports, arrest warrants, and original Indictment.
 - Browning was unable to provide the other documents, but the victim's name is Jose Velasquez.
- Count 9 dated 4.4.2017. Browning was arrested & incarcerated on 4.3.2017.

Attachment 2

6.28.2017 Public Defender Elizabeth Markowitz Discovery request & consolidated motions (5 pages)

- In Support of Discovery statutes that apply (page 1)
- * In Support of Suppression of evidence (page 3)
- In Support of case law for Indictment Perfect in form & substance. (page 4)

Attachment 3

3.1.2021 Constitutional Demand For Speedy Trial (1 page).

It was notarized & served to all parties, with certificates of service

Attachment 4

7.12.2021 Demand For Acquittal of all charges for failure to try (1 page)

It was notarized + served to all parties, with certificates of service

Attachment 5

10.30.2024 8 motions (8 pages) in support of pretrial procedures that apply to Browning's case

Served to all parties with certificates of service

Attachment 6

11.26.2024 Order dismissing motions (1 page)

The order is based on Johnson v. State, 315 Ga. 876 (2023): Discretion of Judges to accept or deny Pro Se motions by a counseled Defendant. This case is in violation of the U.S. Constitution VI Amendment. Judge Ingram, also, had the discretion to accept the 10.30.2024 Pro Se motions, based on Public Defender Richard marks Ineffective Assistance of counsel, and based on how the motions applied legally + correctly to Browning's case. One of the Pro Se motions was a motion to proceed Pro Se. There is no other way to ask the court to proceed Pro Se, if your Public Defender will not assist you, as in Browning's case. The order, also, states there was a Sustained Plea of Insanity. Why would the defense file a plea of insanity after one day since return from Georgia DBHDD with a status of Competent to stand trial?

Attachment 7

5.6.2025 Order Dismissing Appeal (1 page)

The order is based on Johnson v. State, 315 Ga. 876 (2023): Discretion of Judges to accept or deny Pro Se motions by a counseled ~~Def.~~ Defendant. The case is in violation of the U.S. Constitution VI Amendment. Judge Shukura Ingram would not accept Pro Se motions to proceed Pro Se ~~to~~ and Public Defender Richard marks would not assist Browning with filing to proceed Pro Se or scheduling a Faretta hearing, that Browning requested on conviction day (3.27.25). Browning has a Right to directly Appeal. Browning filed a Notice of Appeal on 4.2.2025. The Notice of Appeal and record should have been sent to the Georgia Supreme Court, by the trial court clerk, by 5.3.2025. Judge Ingram's order to dismiss Appeal was not signed until 5.6.25.

- Attachments 6 + 7 (Orders by Judge Ingram) were illegal maneuvers by the court, to deny Browning of his Rights + laws that applied correctly to his case, to obtain an illegal conviction of an innocent Defendant.

X REASONS FOR GRANTING PETITION

- To prevent deviation from laws & U.S. Constitutional Rights, as stated in Part II of this Petition: main questions for review
- To prevent a conflict of U.S. Constitution VI Amendment and Georgia Supreme Court case law: Johnson v. State, 315 Ga. 876 (2023), as stated in part II of this Petition: main questions for review.
- For Review of Browning's complete case, to prevent ~~an~~ continued illegal incarceration of an illegally convicted & innocent Defendant.
- If the ~~P~~ Petition is not granted, an extreme miscarriage of justice will be the result.

XI RECORD TO ACQUIRE FROM TRIAL CLERK

- The complete record for case 17sc152674
- The complete record for original case 17sc150985
- Transcripts of court hearings under Judge Ural Glanville.
 - 11.1.2021 status conference
 - 1.31.2022 status conference
 - 8.8.2022 status conference
- Transcripts of court hearings under Judge Scott McAffee
 - 2.23.2023 status conference
- Transcripts of court hearings under Judge Shukura Ingram
 - 2.2.2024 status conference
 - 2.9.2024 status conference
 - 2.23.2024 Pretrial conference
 - 3.4.2024 Pretrial conference
 - 3.24.2024 Pretrial conference
 - 11.26.2024 Pretrial conference
 - 3.5. ~~2024~~²⁰²⁵ Competency bench trial
 - 3.14. ~~2024~~²⁰²⁵ Competency bench trial
 - 3.19. ~~2024~~²⁰²⁵ Pretrial conference

institutional legal services, at no fault to the petitioner.

Submitted this 28 day of July, 2025.

Rayon B. O.
Petitioner: ~~Pro Se~~, incarcerated, Forma Pauperis
Raylon L. Browning
GDC # 0001151205
Hays State Prison
777 Underwood Dr.
Trion, GA 30763