

No. \_\_\_\_\_

---

In Re RAMSEY E. CLAYTER,  
*Petitioner.*

---

MOTION FOR LEAVE TO SUPPLEMENT THE RECORD AND TO FILE  
ADDITIONAL DOCUMENTS  
PURSUANT TO SUP. CT. R. 20.4(B) AND 21

---

Petitioner:

Ramsey E. Clayter, pro se  
8 Nichols St., Apt. 2F  
Gardner, MA 01440  
(978) 894-4598  
ramseyclayter10@gmail.com

Nature of Case:

Motion for leave to supplement the record and file additional documents in support  
of pending original habeas petition, relevant to custody.

Relief Requested:

Leave to file supplemental exhibits and supporting documents as part of the record  
in the pending petition for an original writ of habeas corpus.

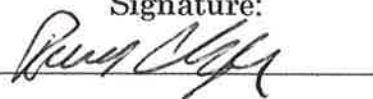
Citation of Relevant Rules:

Sup. Ct. R. 20.4(b); Sup. Ct. R. 21; Sup. Ct. R. 29.4

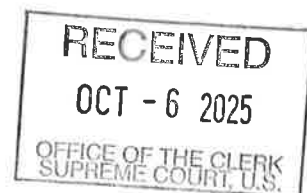
Date:

September 25, 2025

Signature:



Ramsey E. Clayter, pro se



No. \_\_\_\_\_

IN THE

SUPREME COURT OF THE UNITED STATES

In Re RAMSEY E. CLAYTER,

Petitioner.

**MOTION FOR LEAVE TO SUPPLEMENT THE RECORD AND TO FILE  
ADDITIONAL DOCUMENTS PURSUANT TO SUP. CT. R. 20.4(b) AND 21.**

Petitioner, Ramsey E. Clayter respectfully moves, pursuant to Sup. Ct. R. 20.4(b) and 21, for leave to supplement his pending petition for an original writ of habeas corpus with additional documents material to the Court's consideration, as they directly bear on the custody status challenged.

**1. Standard**

**Relevance:** The material is relevant to exhaustion, diligence, Petitioner's asserted claim of a void judgment due to lack of subject-matter jurisdiction and fraud on the court. Provides the Court with a truthful course of events to better understand the totality of proceedings in the matter.

**Timing:** Pursuant to Sup. Ct. R. 33.1(g), the initial petition had a max word count of 9,000 words. Displayed on the Petitioners Certificate of Compliance pursuant to Sup. Ct. R. 33.2(b) and Rule 14(g), the Petitioner used 8,991 words toward the cap. Due to word count limitations, prior filings and supporting authorities could not be fully addressed and is the reason why it wasn't filed earlier.

**2. State Court** - The Petitioner's initial filing included all denied Rule 30 motions for rehearing pursuant to Rule 14. Petitioner was unable to address all proceedings in

state court, addressing the most relevant to the petition. Those orders are filed in the Appendix. See *App. A*, at A-53-A-60.

3. Federal Court – Attached are the motions filed in the District Court of Massachusetts providing the Court with a truthful and more accurate course of events in the matter.

- On May 1, 2025 Petitioner filed a Notice of Violation Pursuant to Fed. R. Civ. P. 11(b), explaining the docket has been manipulated and falsified several times, the district attorney has continued to assert claims unsupported by facts or evidence, and the State's practice of targeting college educated Blacks is a hate crime. Pursuant to Fed. R. Civ. P 5.1, United States Attorney General Pam Bondi was notified.
- On May 1, 2025, Petitioner filed a Motion to Vacate Void Judgment Due to Fraud on The Court pursuant to Fed. R. Civ. P. 60(D)(3), motion was denied.
- On July 14, 2025, Petitioner filed an Emergency Motion For Summary Judgment to Vacate Void Convictions pursuant to Fed. R. Civ. P. 56(a). Clarifying judgment is *void ab initio* due to lack of subject matter jurisdiction, and vacatur is a matter of law. Additionally, citing ongoing deprivation of rights under the Fourteenth Amendment, motion was denied.
- On June 20, 2025, Petition filed a Motion For Judgment on Pleadings Forthwith pursuant to Fed. R. Civ. 12(c).
- On September 25, 2025, Petitioner submitted a Corrected Cover sheet to Petition.

**Relief Requested**

Leave to file supplemental exhibits and supporting documents as part of the record in the pending petition for an original writ of habeas corpus.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ramsey E. Clayter", written over a horizontal line.

September 25, 2025

Ramsey E. Clayter, pro se

8 Nichols St Apt 2F.

Gardner, MA 01440

(978) 894-4598

ramseyclayter10@gmail.com

No. \_\_\_\_\_

IN THE  
SUPREME COURT OF THE UNITED STATES

\_\_\_\_\_  
In Re RAMSEY E. CLAYTER,

*Petitioner.*

\_\_\_\_\_  
On petition for a writ of habeas corpus under 28 U.S.C § 2241 and Sup. Ct. R. 20 to  
Gardner District Court First District Court of Northern Worcester

\_\_\_\_\_  
PETITION FOR A WRIT OF HABEAS CORPUS

\_\_\_\_\_  
Ramsey E. Clayter, pro se  
8 Nichols St., Apt. 2F  
Gardner, Massachusetts 01440  
(978) 894-4598  
ramseyclayter10@gmail.com

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

FILED IN CLERKS OFFICE

JUN 20 '25 AM 9:42 USDC MA

RAMSEY CLAYTER,  
Petitioner,

v.

Civil Action No. 25-cv-40023

DIANE MASSAOUH,  
Respondent.

---

**MOTION FOR JUDGMENT ON PLEADINGS FORTHWITH  
PURSUANT FED. R. CIV. P. RULE 12(c)**

---

Now comes the petitioner, Ramsey E. Clayter, pro se litigant, respectfully moves this Court to issue judgement that he is in state custody in violation of the U.S. Constitution, grant writ of habeas corpus, and order his immediate release in his petition for writ of habeas corpus pursuant 28 § 2254 filed February 10 2025 forthwith.

**Grounds**

On the grounds that the Commonwealth's custody of the petitioner violates the Supremacy Clause of the U.S. Constitution, as the states action directly contradicts the provisions established in the 13<sup>th</sup> Amendment to the U.S. Constitution, as the petitioner is being held in servitude without being duly convicted of a crime, absence of a valid accepted plea agreement signed by a judge relinquishing his liberty, and absent a sentence being imposed on him. Thus, the

states action is preempted pursuant to the Supremacy Clause, and must yield. See U.S. Const. art. VI, cl. 2.; U.S Const. amend. XIII; *Arizona v. United States*, 567 U.S. 387 (2012); *Gade v. Nat'l Solid Wastes Mgmt. Ass'n*, 505 U.S. 88 (1992).

### **Argument**

1. Corroborated by the certified docket previously filed in Appendix A at 9-14, the court didn't hold a mandatory probable cause hearing in my case. As seen on the docket, my right to proceed against indictment was waived, and three charges were amended. Pursuant to M.G.L. c. 263, § 4A "if a defendant waives the right to be proceeded against by indictment, a probable cause hearing shall be held." The court has not established that a crime has taken place, nor are they in possession of any inculpatory evidence. This establishes that I have not been duly convicted within the meaning of the 13<sup>th</sup> Amendment to the U.S. Constitution.
2. Corroborated by the audio recording of the probable disposition hearing held on May 5<sup>th</sup>, 2020, previously filed into court record, the judge reviewed the petitioners plea agreement in full. The judge never accepted the plea agreement, never imposed a sentence, and didn't inform the petitioner of his right to appeal. Corroborating that the petitioner is in servitude without being duly convicted of a crime, absent of a valid accepted plea agreement signed by a judge relinquishing his liberty, and absent a sentence being imposed.
3. In *United States v. Kozminski*, 487 U.S. 931 (1988) the Court defined involuntary servitude. "the term involuntary servitude necessarily means a condition of servitude in which the victim is forced to work for the defendant by the use or threat of coercion through law or the legal process. Pp. 487 U.S. 939-953.

Also, "Moreover, the facts that the phrase "involuntary servitude" was intended to cover those forms of compulsory labor akin to African Slavery." *Butler v. Perry*, 240 U.S. 328, 240 U. S. 232, and that the Amendment extends beyond state action. Also, "involuntary servitude exists only when (a) the servant believes that he or she has no viable alternative but to perform service for the master (b) because of (1) the master's use or threatened use of physical force, or (2) the master's use or threatened use of state-imposed legal coercion." Page 487 U. S. 939. My servitude included snow removal, land scaping, kitchen work, and tutoring my fellow inmates in preparation for their HiSET exam to earn their High School Equivalency Diploma.

4. In *Ableman v. Booth*, 62 U.S. 506 (1858), the Court held, relying on the supremacy clause in a state habeas corpus case reestablishing federal supremacy. The court reversed Wisconsin's decision granting habeas corpus and releasing Sherman Booth stating: 1) "No decision of a state court is valid if it conflicts with a decision by a federal court." 2) "This Constitution, and the laws of the United States which shall be made in pursuance thereof, shall be the supreme law of the land, and obligatory upon the judges in every State." 3) When a writ of habeas corpus is served on a marshal or other person having a prisoner in custody under the authority of the United States, it is his duty, by a proper return, to make known to the State judge or court the authority by which he holds him." I request this Court to take the same action.

5. As stated in U.S. Const. art.VI, cl. 2. the Supremacy Clause "This Constitution, and the Laws of the United States which shall be made in Pursuance thereof and



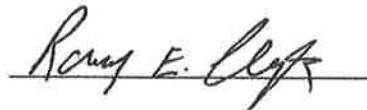
all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding." In the landmark case of *Marbury v. Madison*, 5 U.S. 137 (1803) the court established judicial review, that the Constitution is the supreme law of the land, and any action in contradiction of the Constitution is void. The Commonwealth's action against me is in contradiction of the 13<sup>th</sup> Amendment of the U.S. Constitution rendering their action void.

6. I have requested the plea agreement and mittimus in my case several times. The Gardner District Court, Worcester County Sheriff's Office, and Massachusetts Probation Service has unlawfully withheld these public records from view. Due to the plea agreement being unsigned by a judge, this would create a void judgment.

WHEREFORE, the petitioner request this Court to grant judgment on the pleadings, issue writ of habeas corpus, and order my immediate release from state custody. Subsequently, preventing any further irreputable harm to my constitutional rights.

June 20, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ramsey E. Clayter", is written over a horizontal line.

Pro Se Litigant  
978-894-4598  
[Ramseyclayter10@gmail.com](mailto:Ramseyclayter10@gmail.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on June 20, 2025, this Motion For Judgment On Pleadings Forthwith Pursuant Fed. R. Civ. P. Rule 12(C) was filed in the Clerk Magistrates Office located at the Harold D. Donohue Federal Building & U.S. Courthouse 595 Main St, Worcester, MA 01608. A copy of this motion was also emailed to the address below.

Emily Rothkin (BBO #711591)  
Assistant Attorney General Appeals Division  
One Ashburton Place Boston, Massachusetts 02108  
(617) 727-2200, ext. 2461  
emily.rothkin@mass.gov

Respectfully submitted,

June 20, 2025

A handwritten signature in black ink, appearing to read "Ramsey E. Clayter", written over a horizontal line.

Pro Se Litigant  
978-894-4598  
Ramseyclayter10@gmail.com

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED IN CLERKS OFFICE

RAMSEY CLAYTER,  
Petitioner,

JUL 14 '25 PM 11:26 USDC MA

v.

Civil Action No. \_\_\_\_\_

DIANE MASSOUH,  
Respondent.

---

**EMERGENCY MOTION FOR SUMMARY JUDGMENT TO VACATE VOID  
CONVICTIONS PURSUANT TO FED. R. CIV. P. 56(a)**

---

NOW COMES the Petitioner, Ramsey E. Clayter, *pro se*, and respectfully moves this Honorable Court, pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, for the entry of summary judgment vacating four void convictions entered in *Commonwealth v. Ramsey E. Clayter*, Docket No. 2063CR0084. This motion is brought on an **emergency basis**, as the unlawful enforcement of these convictions—without any lawful adjudication—continues to cause irreparable harm and violates Petitioner's fundamental constitutional rights.

**I. INTRODUCTION AND EMERGENCY BASIS**

This motion seeks immediate relief from convictions that are **void ab initio due to a complete lack of subject matter jurisdiction** in the state trial court. The record conclusively demonstrates that no valid guilty plea was ever entered, no finding of guilt was ever adjudicated, and no sentencing hearing ever occurred. Petitioner is currently subject to probationary supervision not lawfully imposed by a judge, thereby resulting in ongoing unconstitutional restraint.

Petitioner requests that this Court exercise its inherent and equitable authority to grant

expedited relief due to the **continuing deprivation of liberty without due process**, and in light of the **substantial constitutional violations** that render the underlying convictions void as a matter of law.

## **II. STATEMENT OF MATERIAL FACTS PURSUANT TO LOCAL RULE 56.1**

1. On May 5, 2020, the trial court held a disposition hearing in *Commonwealth v. Ramsey E. Clayter*, Docket No. 2063CR0084. The court did not obtain a valid guilty plea, adjudicate guilt, or impose a sentence.

(See Audio Recording of Disposition Hearing, filed in record.)

2. The trial court never entered a formal finding of guilt or sentencing order.

(See Certified Docket, Appendix A at 2–7.)

3. No valid charging instrument—indictment or complaint—was ever filed in the matter.

4. The Order of Probation reflects no judicial signature or lawful imposition by a judge. Instead, terms were imposed by a Chief Probation Officer.

(See Appendix A at 8.)

5. Petitioner has never been afforded a probable cause hearing as required by Massachusetts law where charges are amended and a defendant remains in District Court. (See M.G.L. c. 263, § 4A; Appendix A at 49–50.)

6. The Petitioner remains under probationary supervision to this day without legal authority, creating a continuing violation of his constitutional rights.

## **III. LEGAL ARGUMENT**

### **A. Judgment Is Void for Lack of Subject Matter Jurisdiction**

A court must have both subject matter jurisdiction and proper charging instruments to render a valid criminal judgment. Where either is absent, the resulting judgment is **void**, not merely voidable. *United States v. Boch Oldsmobile, Inc.*, 909 F.2d 657, 661 (1st Cir. 1990) “A judgment is void only if the court that rendered it lacked jurisdiction... or acted in a manner inconsistent with due process.” *United States v. Cotton*, 535 U.S. 625, 630–31 (2002) “A court’s jurisdiction requires a valid indictment.”

### **B. Continued Enforcement of a Void Judgment Violates Due Process**

The Fourteenth Amendment prohibits the deprivation of liberty without due process of law.

Enforcement of probation terms without a valid conviction or sentence violates fundamental rights and causes irreparable harm. See *Mathews v. Eldridge*, 424 U.S. 319 (1976). Also *Hamdi v. Rumsfeld*, 542 U.S. 507 (2004). “Due process requires meaningful opportunity to challenge deprivation of liberty.”

**C. Petitioner Is Entitled to Summary Judgment Under Rule 56(a)**

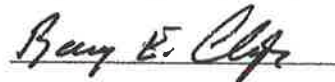
There is no genuine dispute as to any material fact. The record clearly demonstrates that no plea, adjudication, or lawful sentence occurred. Petitioner is therefore entitled to judgment as a matter of law.

**IV. RELIEF REQUESTED**

WHEREFORE, Petitioner respectfully requests that this Honorable Court:

1. GRANT this Emergency Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56(a);
2. VACATE the four convictions entered in *Commonwealth v. Ramsey E. Clayter*, Docket No. 2063CR0084, as void ab initio;
3. Order immediate cessation of probationary enforcement resulting from said void convictions; and
4. Grant any further relief the Court deems just and proper to prevent further unconstitutional harm.

Respectfully submitted,



July 14 2025

Ramsey E. Clayter, Pro Se

8 Nichols St. Apt. 2F

Gardner, MA 01440

(978) 894-4598

Ramseyclayter10@gmail.com

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**RAMSEY CLAYTER,**  
Petitioner,

v.

Civil Action No. 25-cv-40023

**DIANE MASSAOUH,**  
Respondent.

---

**MOTION TO VACATE VOID JUDGMENT DUE TO FRAUD ON THE COURT  
PURSUANT TO FED R. CIV. P. RULE 60(D)(3)**

---

The petitioner Ramsey E. Clayter, pro se litigant, moves this court to vacate void judgment due to fraud on the court that violates my 4<sup>th</sup> Amendment right against unreasonable seizure secured within the U.S. Constitution and Fed. R. Crim. P. Rule 5.1 Preliminary Hearing. See *Mapp v. Ohio*, 367 U.S. 643 (1961), my 14th Amendment right to due process and equal protection under the law secured within the U.S. Constitution. See *Gerstein v. Pugh*, U.S. 103, 1975. Also *Brady v. Maryland*, 373 U.S. 83 (1963), my 6th Amendment right to confront and question the witness against me, and right to a speedy trial secured within the U.S. Constitution. See *Alford v. United States*, 282 U.S. 687 (1931).

1. Corroborated by the certified docket filed herewith, a probable cause hearing was never held in my case due to the Commonwealths inability to establish that a crime has taken place. I was unjustly stripped of my guaranteed 5<sup>th</sup> Amendment right to proceed against indictment without a probable cause hearing being held.
2. The court issued a fraudulent arrest warrant and search warrant without probable cause.
3. The prosecution conspired with my public defender and five different judges to ensure that all of the evidence was withheld for me for 54 months due to its exculpatory nature.

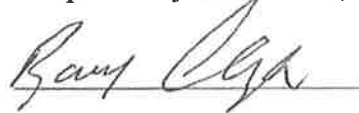
4. My liberty was unjustly taken when I was kidnapped and held against my will for almost four years without receiving due process guaranteed to me by the 14<sup>th</sup> Amendment of the U.S. Constitution. Consistent with the text of 18 U.S.C. Chapter 77 § 1589 I was a victim of human trafficking. Corroborated by the video evidence filed herewith, when I filed motions to end my unlawful restraint, the Clerk Magistrate's Office manipulated my documents, and refused to file several of my motions in order to hide their wrongdoing, constituting constitutional fraud on their behalf.
5. There were no hearings held in my case. This violates my guaranteed 6<sup>th</sup> Amendment right secured within the U.S. Constitution to cross examine the witness against me, and corroborates that I have received ineffective assistance of counsel. See *Strickland v. Washington*, 466 U.S. 668 (1984).

Due to the Structural, procedural, and constitutional violations by officers of the court. The convictions secured against me are void as "fraud poisoned the process." In *Obergefell v. Hodges* is 576 U.S. 644 (2015), the Supreme Court held "The central premise of liberty is dignity of the person, it's not optional, it's guaranteed." In *Goldberg v. Kelly*, 397 U.S. 254 (1970), the Supreme Court held "Taking anything from you without a hearing violates due process and human dignity." In *Fuentes v. Shevin*, 407 U.S. 67 (1972), The Supreme Court held "No seizure without notice or opportunity to object." In *Trop v. Dulles*, 356 U.S. 86 (1958), the Supreme Court held "Stripping rights without due process is more primitive than torture."

It is impossible for this Court to rule in error in my case. There are several constitutional, procedural, and statute violations clearly raised with the proper authorities to support them contained in this filing and previous filings within my case. For this court to ignore this conduct, is the equivalent of saying the Constitution doesn't apply to the Black residents of Massachusetts. These actions would "bring the judiciary into disrepute, thereby undermining public confidence in the integrity and impartiality of the administration of justice which amounted to a misdemeanor." See *United States, v. Claiborne*, 781 F.2d 1327 (9th Cir. 1986).

April 29th, 2025

Respectfully submitted,



Pro Se Litigant

978-894-4598

[Ramseyclayter10@gmail.com](mailto:Ramseyclayter10@gmail.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on April 29th, 2025, this motion to vacate void judgment due to fraud on the court pursuant to Fed F. Civ. P. Rule 60(d)(3) were mailed to the Clerk Magistrate's Office located at the Harold D. Donohue Federal Building & U.S. Courthouse 595 Main St, Worcester, MA 01608, and emailed to the address listed below.

Emily Rothkin (BBO #711591)  
Assistant Attorney General Appeals Division  
One Ashburton Place Boston, Massachusetts  
02108 (617) 727-2200, ext. 2461  
emily.rothkin@mass.gov

Respectfully submitted,

April 29<sup>th</sup>, 2025

A handwritten signature in black ink, appearing to read "Ramsey Clayter", written over a horizontal line.

Pro Se Litigant  
978-894-4598  
Ramseyclayter10@gmail.com



MAY 1 '25 AM 11:03 USDC MA

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**RAMSEY CLAYTER,**  
Petitioner,

v.

Civil Action No. 25-cv-40023

**DIANE MASSAOUH,**  
Respondent.

---

**NOTICE OF VIOLATION  
PURSUANT FEDERAL RULES OF CIVIL PROCEDURE RULE 11B**

---

Pursuant to Federal Rules of Civil Procedure Rule 11(b), the petitioner, Ramsey Clayter, pro se litigant, respectfully notifies the Court that false filing were submitted into court record. The court docket has been manipulated and falsified several times, and the Worcester County District Attorney's Office continued to assert claims not supported by reasonable factual basis or evidence. Corroborated by the video evidence filed herewith, the Clerk's Office has manipulated documents in this case. This violates Fed. R. Civ. P. Rule 11(b). Pursuant to Fed. R. Civ. P. Rule 5.1, I officially present this Court with a constitutional question.

Our judiciary has been hijacked and poisoned. Weaponized by rogue judges and democratic politicians for political and personal gain. These improper actions are executed daily with total disregard for the U.S. Constitution and the advance directives from our President Donald J. Trump and his administration. The number one target of our elected leaders and judiciary in Massachusetts is college educated Black men, as we pose the biggest threat to their party. Supporting our President and his administration has now become a criminal activity in our State.

The courts practice of targeting college educated Black conservatives to intimidate and silence us is unconstitutional. Initiating fraudulent criminal charges that lack probable cause, refusing to hold probable cause hearings, withholding exculpatory evidence, and unjustly imprisoning Blacks based on race and political affiliation is a hate crime.

This practice violates Fed. R. Crim. P. Rule 5.1 Preliminary Hearing, my due process and equal protection rights secured within the 14<sup>th</sup> Amendment of the U.S. Constitution, my right against unreasonable seizure secured within the 4<sup>th</sup> Amendment of the U.S. Constitution, my right to a speedy trial secured within the 6<sup>th</sup> Amendment of the U.S. Constitution, my right to freedom of speech secured within the 1<sup>st</sup> Amendment of the U.S. Constitution, my right to vote secured within the 15<sup>th</sup> Amendment of the U.S. Constitution, The Voting Rights Act (1965), and Title 18 U.S.C. § 249 The Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009. See *Chambers v. Nasco, Inc.*, 501 U.S. 32 (1991), *Gerstein v. Pugh*, U.S. 103 (1975), *Doggett v. United States*, 505 U.S. 647 (1992), *Illinois v. Gates*, 462 U.S. 213 (1983), *Brady v. Maryland*, 373 U.S. 83 (1963), *Eavenson, Auchmuty & Greenwald v. Holtzman*, 775 F.2d 535, 540, 3d Cir. 1985, *In re Kunstler*, 914 F.2d 505.

Pursuant to Fed. R. Civ. P. Rule 5.1 the Court must promptly notify United States Attorney General Pam Bondi for review of constitutional challenge. I rely on the following exhibits filed herewith, affidavit, three different court dockets, video evidence of clerk's manipulating official public court documents, and one of the social media posts that made me a target.

Additionally, I rely on my previously filed petition for writ of habeas corpus, Appendix A, and Appendix B filed in case no. 25-cv-40023 to support my asserted claims. This filing serves as official notice to the Court that docket no. 2063CR0084 *Commonwealth v. Ramsey E. Clayter* has been fabricated, falsified and introduced in bad faith for improper use by the Commonwealth of Massachusetts, and the convictions secured against me are void. The Court has an ethical and legal obligation to act on this as it violates Fed. R. Civ. P. Rule 60(d)(3) Fraud On the Court. See *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944).

April 29th, 2025

Respectfully submitted,



Pro Se Litigant  
978-894-4598  
Ramseyclayter10@gmail.com