

No. 25-5836

IN THE
SUPREME COURT OF THE UNITED STATES

JAMES SHELLY TAYLOR - PETITIONER

V.S.

TEXAS

PETITION FOR REHEARING OF ORDER DENYING

WRIT OF CERTIORARI

JAMES SHELLY TAYLOR #02389661

ELLIS UNIT

1697 FM 980

HUNTSVILLE, TEXAS 77343

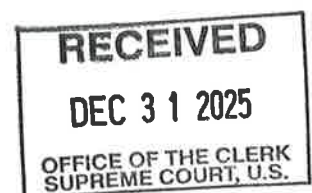


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NO. 25-5836

PETITIONERS MOTION FOR REHEARING

TO THE HONORABLE JUSTICES OF THE UNITED STATES

SUPREME COURT COMES NOW JAMES SHELLY TAYLOR,

PETITIONER, AND SUBMITS THIS MOTION FOR REHEARING

PURSUANT TO SUPREME COURT RULE 44 AND RESPECTFULLY

REQUESTS RECONSIDERATION OF DENIAL OF CERTIORARI

BASED ON THE FOLLOWING:

REASONS REVIEW IS REQUESTED

ISSUE I - SEARCH WARRANT 1800004840SW2 HAD NO

PROBABLE CAUSE TO ISSUE RESULTING IN A FRANKS

VIOLATION.

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ISSUE II. POLICE SECURED WARRANT 1800004840SW2 IN

VIOLATION OF TEXAS PENAL CODES § 37.02, § 37.03,

§ 37.06 AND § 37.10 AND IN VIOLATION OF 18 U.S.C.S.

§1001 AND §1623.

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ISSUE III. SEARCH WARRANT 1800004840SW2 WAS USED DURING THE ENTIRE PROSECUTION FROM THE BOND HEARING, THROUGH TRIAL AND INTO THE HABEAS CORPUS PROCEEDING, DENYING PETITIONER DUE PROCESS OF LAW AND VIOLATING TEXAS PENAL CODE §37.09 AND §37.10 AS WELL AS 18 U.S.C. § 1623, CAUSING THE ENTIRE PROCESS TO BE FUNDAMENTALLY UNFAIR.

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ISSUE IV. PETITIONER WAS DENIED A FULL AND FAIR HEARING RELATED TO THE DEFICIENT PERFORMANCE OF BOTH TRIAL AND APPEAL COUNSEL. SINCE PETITIONER'S FILING OF WRIT OF CERTIORARI THE TEXAS COURT OF CRIMINAL APPEALS REVERSED AND REMANDED RECIO V. STATE (IN RE RECIO, 2025 TEX. CRIM. APP. UNPUB LEXIS 367) BASED ON DEFICIENT COUNSEL OF LESS GRAVITY

THAN PETITIONERS CLAIMS.

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ISSUE II. THIS COURTS HOLDINGS IN GLOSSIP V. OKLAHOMA THAT WAS REVERSED AND REMANDED WERE SIMILAR BUT ARE MORE GRAVE IN PETITIONERS CASE. PAGE 13

ISSUE III. STATE ACTORS WHO HAVE BROKEN THE LAW WILL BE ENCOURAGED TO REPEAT THE VIOLATIONS IF THIS CASE IS NOT REVERSED AND REMANDED. —

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ISSUE I. IN SECTIONS 1-5 OF THE DOCUMENT MM-FOCL (SEE APPENDIX A1) PETITIONER DETAILS IN A CRIMINAL COMPLAINT HOW GRAND PRAIRIE DETECTIVE DENICE KOEN AND IN FACT A CRIMINAL COMPLAINT RELATED TO HER WARRANTS WAS SENT TO THE CHIEF OF THE GRAND PRAIRIE POLICE DEPARTMENT ON 6 AUGUST, 2025 WITH A C.C.

SENT TO THE DALLAS COUNTY SHERIFF THE SAME DAY.
ON 25 AUGUST, 2025 A C.C. OF THE SAME COMPLAINT
WAS SENT TO THE UNITED STATES ATTORNEY'S OFFICE IN
DALLAS TEXAS. FACTUAL BASIS: DETECTIVE KOEN SCANNED
PETITIONERS PHONE ON 3/14/2018 BY HER OWN ADMISSION
AND ALLEGEDLY FOUND CHILD PORNOGRAPHY (RETURN FOR
WARRANT ~~180000503~~⁹³ 18000048405W3, A COPY WAS
INCLUDED IN PETITIONERS ORIGINAL FILING, APPENDIX H-12,
DEFENSE EXHIBIT 3). THE NEXT DAY DET. KOEN SECURED
WARRANT 18000048405W2, SEEKING TO COMPEL PETITIONER
TO UNLOCK THE PHONE VIA BIOMETRICS TO SEARCH FOR
CHILD PORNOGRAPHY ALLEGEDLY SHOWN BY PETITIONER TO
PETITIONERS 12 YEAR OLD DAUGHTER. SINCE THE PHONE
HAD BEEN SCANNED ON 3/14/2018 AND THE ENTIRE
CONTENTS SCANNED, DET. KOEN HAD NO PROBABLE
CAUSE TO SECURE SEARCH WARRANT 18000048405W2,
CAUSING A FRANKS VIOLATION.

ISSUE II. NOT ONLY WAS DET. KOEN'S SECURING WARRANT 1800004840SW2 A FRANKS VIOLATION, IT WAS AGAINST TEXAS LAW. DET. KOEN COMMITTED PERJURY AND AGGRAVATED PERJURY, MADE 2 OR MORE INCONSISTANT STATEMENTS, BOTH OF WHICH CANNOT BE TRUE, WHILE UNDER OATH AND CAUSED CREATION OF A TAMPERED GOVERNMENTAL RECORD, WARRANT 1800004840SW2, THAT WOULD BE MATERIAL TO PETITIONERS ARREST AND CONVICTION BY ALLOWING HIGHLY PREJUDICIAL PHOTOS INTO TRIAL, BASED ON THIS FRAUDULENT DOCUMENT. THIS IS INTERTWINED WITH PETITIONERS CLAIMS OF DEFICIENT PERFORMANCE OF TRIAL COUNSEL AS HE HAD 4 YEARS PRIOR TO TRIAL TO INVESTIGATE, DISCOVER AND MOTION FOR SUPPRESSION BUT DID NOT. DET. KOEN ALSO VIOLATED UNITED STATES LAW, 18USCS §1001 AND §1623.

ISSUE III. THE SEARCH WARRANT 1800004840SW2 WAS

USED BY DISTRICT ATTORNEY JAY WORLEY DURING THE BOND HEARING, AND IN FACT PETITIONERS BOND ON THE CHILD PORNOGRAPHY CHARGE WAS NOT LOWERED. DISTRICT ATTORNEY WORLEY PERPETRATED A FRAUD ON THE COURT THAT DECEIVED THE COURT INTO NOT LOWERING PETITIONERS BOND. THIS FRAUD WOULD BE CONTINUED BY ASSISTANT DISTRICT ATTORNEYS MISS MITCHELL AND DOBIYANSKI AS THEY USED THE WARRANT 1800004840SW2, PRESENTED AS A VALID DOCUMENT (STATES EXHIBIT 10) TO INTRODUCE HIGHLY PREJUDICIAL CHILD PORNOGRAPHY (PLEASE SEE APPENDIX A-1, DOCUMENTS MM-FOC1 AND AD-FOC1) AND ENTERING A CRIMINAL CONSPIRACY IN VIOLATION OF TEXAS PENAL CODE SECTION 15.02, AS OUTLINED IN MM-FOC1 AND AD-FOC1. MISS MITCHELL IS A PRINCIPAL* TO MS. DOBIYANSKI PRESENTING WARRANT 1800004840SW2 TO THE COURT AND BOTH ARE ACCESSORIES AFTER THE FACT (18 USC § 3,

*18 USC § 2

APPENDIX B2, PAGES USCS P1 - USCS P2) AND BY KNOWING
DET. KOEN HAD COMMITTED A FELONY THEY ARE ALSO
GUILTY OF VIOLATION OF 18 USCS § 4 BECAUSE THEY CONCEALED
HER CRIMES, MISS MITCHELL AND MS. DOBIYANSKI ALSO VIOLATED
18 USCS § 244, CONSPIRING TO DEPRIVE PETITIONER OF
THE RIGHT TO DUE PROCESS OF LAW, THE 4TH AMENDMENT
RIGHT TO BE FREE FROM ILLEGAL, WARRANTLESS SEARCHES,
RIGHT TO A FAIR TRIAL, 18 USCS § 242 BY DEPRIVING
PETITIONER OF CONSTITUTIONAL RIGHTS UNDER COLOR OF LAW,
18 USCS § 371 BY CONSPIRING TO DEFRAUD A COURT OF
THE UNITED STATES, 18 USCS § 1001 AND § 1623 FOR
USING DOCUMENT 1800004840SW2 IN AN OFFICIAL
PROCEEDING, KNOWING IT CONTAINED FALSE MATERIAL
STATEMENTS. THESE VIOLATIONS MADE PETITIONERS
TRIAL FUNDAMENTALLY UNFAIR. THESE SAME VIOLATIONS
WERE CONTINUED IN A CONTINUING COURSE OF CRIMINAL
CONDUCT BY MS. ANNA KUBALAK AND DALLAS COUNTY

DISTRICT ATTORNEY JOHN CREUZOT HAVE DENIED ANY WRONGDOING BY THE PROSECUTORS, AND THEMSELVES PERPETRATED A FRAUD ON THE HABEAS JUDGE J.T. KOCH WHO RECOMMENDED DENIAL OF PETITIONERS HABEAS WITHOUT EVEN HAVING AN EVIDENTIARY HEARING AND ALSO A FRAUD ON THE TEXAS COURT OF CRIMINAL APPEALS WHO DENIED PETITIONERS HABEAS CORPUS WRIT WITHOUT WRITTEN ORDER (SEE APPENDIX A1, DOCUMENTS AK-FOC1 AND JC-FOC1 FOR FULL DETAILED CRIMINAL COMPLAINTS RELATED TO WHERE AND HOW THE LAW WAS BROKEN). COPIES OF THE DOCUMENTS MM-FOC1, AO-FOC1, JC-FOC1 AND AK-FOC1 WERE MAILED TO THE DALLAS COUNTY SHERIFF ON 16 NOVEMBER, 2025, FOLLOWED BY COPIES SENT TO THE UNITED STATES ATTORNEYS OFFICE IN DALLAS TEXAS 2 WEEKS LATER, ALONG WITH AN AFFIDAVIT OF FACT FOR THE U.S. ATTORNEY (APPENDIX A1, PAGE

AOFC-1.)

ISSUE III. TEXAS COURT OF CRIMINAL APPEALS REVERSED AND REMANDED RECIO V. STATE ON WRIT OF HABEAS DUE TO RECIO'S COUNSEL NOT INVESTIGATING THE FORENSIC INTERVIEW OF THE COMPLAINING WITNESS. PETITIONER'S ATTORNEY RECEIVED THOUSANDS OF DOLLARS TO HIRE AN EXPERT FOR DEFENSE AND THOUSANDS OF DOLLARS FOR INVESTIGATORS AND PRODUCED NO WORK PRODUCT FROM THAT MONEY.

PETITIONER INCLUDED THIS CONSTITUTIONAL VIOLATION OF 6TH AMENDMENT RIGHT TO EFFECTIVE COUNSEL, DETAILED IN 51 PAGES OF THE HABEAS WRIT BUT WAS NOT AFFORDED AN EVIDENTIARY HEARING THAT I REQUESTED IN THE WRIT. PETITIONER WAS THUS DENIED A FULL AND FAIR HEARING AT THE STATE LEVEL ON HIS CLAIMS OF DEFICIENT PERFORMANCE

OF BOTH TRIAL AND APPEAL COUNSEL.

ISSUE II. THE SUPREME COURT REVERSED AND REMANDED GLOSSIP V. OKLAHOMA BASED ON PROSECUTIONS USE OF KNOWN PERJURED TESTIMONY. IS IT NOT AS DESERVING FOR PETITIONERS CASE TO BE REVERSED AND REMANDED DUE TO FELONY VIOLATIONS OF LAW BY DETECTIVES, TWO DALLAS COUNTY DISTRICT ATTORNEYS AND 3 DALLAS COUNTY ASSISTANT DISTRICT ATTORNEYS THAT HAVE CAUSED THE VIOLATION OF PETITIONERS CIVIL RIGHTS?

ISSUE VI. STATE ACTORS HAVE BROKEN THE LAW SINCE 2018 AND THE STATE OF TEXAS HAS SHOWN NO REMORSE NOR ADMITTED THEIR ERROR. WONT ALLOWING THESE CRIMES TO GO UNCHECKED CAUSE INTO QUESTION THE INTEGRITY OF THE JUDICIARY AND GIVE INCENTIVE

TO CONTINUE TO BREAK THE LAW. ALL OF THE VIOLATIONS
HAVE WRITTEN DOCUMENTATION IN THE CLERKS RECORD,
TRIAL TRANSCRIPTS AND HABEAS WRIT AND THE STATES
RESPONSES. PETITIONER HAS ALSO INCLUDED IN
APPENDIX A1 THE DOCUMENT "CCA-CSA1" ON PAGES
CCA-1 TO CCA-9, A CRIMINAL COMPLAINT ACCUSING
THE COURT OF CRIMINAL APPEALS OF TEXAS JUDGES
WHO ARE MAGISTRATES WITH A DUTY TO HAVE A
PERSON IN THEIR JURISDICTION WHO RAPED AN 8
YEAR OLD CHILD INVESTIGATED AND ARRESTED, BEING
GUILTY OF AIDING AND ABETTING THE PERPETRATOR.
THE DALLAS COUNTY DISTRICT ATTORNEY'S OFFICE HAS AN
ONGOING DUTY TO DISCLOSE ANY DISABILITY OF ANY
GOVERNMENT WITNESS OR ANY PUBLIC SERVANT TO
THE PETITIONER. THAT WOULD INCLUDE BEING
INVESTIGATED FOR ANY OF THE CRIMES THAT TEXAS
AND THE U.S. ATTORNEY'S WERE MADE AWARE OF.

PETITIONER HAS RECEIVED NO SUCH NOTICE, MEANING NONE OF THE VIOLATIONS OF LAW HAVE EVEN BEEN INVESTIGATED. PETITIONER HAS NOW APPROACHED THE MOST POWERFUL JUSTICES IN OUR UNITED STATES WHO HAVE THE FULL INVESTIGATIVE POWER OF OUR UNITED STATES JUSTICE SYSTEM AT HAND. PETITIONER SENT COPIES OF "CCA-CSA 1" TO THE TRAVIS COUNTY SHERIFF AND THE AUSTIN OFFICE OF THE UNITED STATES ATTORNEY.

PRAYER

PETITIONER PRAYS THE COURT CONSIDER A REHEARING TO PREVENT A MANIFEST INJUSTICE AND REQUESTS THE COURT PLEASE CONSIDER A REVERSE AND REMAND FOR AN EVIDENTIARY HEARING OR A NEW FAIR TRIAL.

RESPECTFULLY

JM

JAMES SHELLY TAYLOR # 02389661

ELLIS UNIT

1697 FM 980

HUNTSVILLE, TX. 77343

I, JAMES SHELLY TAYLOR, PRESENTED THIS MOTION
TO MRS. PHARRIS FOR MAILINT THROUGH THE ELLIS
INDIGENT MAIL PROGRAM ON 18 DECEMBER, 2025,
INDIGENT INMATES ARE NOT ALLOWED TO AFFIX POSTAGE
NOR PLACE ITEM INTO THE MAIL. I SWEAR UNDER
PENALTY OF PERJURY THE ABOVE IS TRUE AND
CORRECT.

SIGNATURE:



NO. 25-5836

CERTIFICATION BY UNREPRESENTED PRO SE PETITIONER

PETITIONER JAMES SHELLY TAYLOR CERTIFIES THAT THIS
PETITION FOR REHEARING IS RESTRICTED TO THE GROUNDS
SPECIFIED IN SUPREME COURT RULE 44, PARAGRAPH 2, AND
IS PRESENTED IN GOOD FAITH AND NOT FOR DELAY.

SIGNATURE:

JS

JAMES SHELLY TAYLOR #02389661

ELLIS UNIT

1697 FM 980

HUNTSVILLE, TEXAS 77343

NO. 25-5836

IN THE
SUPREME COURT OF THE UNITED STATES

TAYLOR
VS.
TEXAS

PROOF OF SERVICE

I, JAMES SHELLY TAYLOR, DO SWEAR OR DECLARE THAT ON THIS DATE, 22 DECEMBER, 2025, AS REQUIRED BY SUPREME COURT RULE 29 I HAVE SERVED THE ENCLOSED MOTION FOR REHEARING ON KEN PAXTON, ATTORNEY GENERAL OF TEXAS BY GIVING THE MOTION COPY TO MRS. PHARRIS, INOIGENT SUPPLY OFFICER FOR MAILING. INOIGENT INMATE IS NOT ALLOWED TO AFFIX POSTAGE.

THE NAME AND ADDRESS SERVED ARE AS FOLLOWS:

KEN PAXTON - ATTORNEY GENERAL OF TEXAS
P.O. BOX 12548
AUSTIN, TX 78711-2548

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED ON 22 DEC 2025


(SIGNATURE)

**Additional material
from this filing is
available in the
Clerk's Office.**