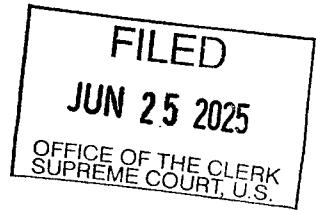


No. 25-5844



IN THE
SUPREME COURT OF THE UNITED STATES

MICHAEL LEON TITTLE — PETITIONER
(Your Name)

VS.

UNITED STATES OF AMERICA — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

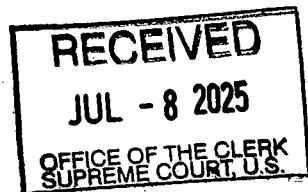
U.S. COURT OF APPEALS FOR THE EIGHTH CIRCUIT
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

MICHAEL LEON TITTLE # 18495-086
(Your Name)
FCI - MEMPHIS
P.O. Box 34550
(Address)

MEMPHIS, TN 38184
(City, State, Zip Code)

n/a.
(Phone Number)



QUESTION(S) PRESENTED

IS A PLEA AGREEMENT INVALID, IF DONE UNKNOWINGLY AND UNINTELLIGENTLY, IF THE AGREEMENT STATES A prior CONVICTION WILL NOT BE USED TO ENHANCE THE SENTENCE, UNDER 21 USC 851, AND THEN IS "CAREERED" USING THE SAME CONVICTION?

LIST OF PARTIES

- All parties appear in the caption of the case on the cover page.
- All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

RELATED CASES

NONE

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STATUTES AND RULES

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OTHER

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

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix A to the petition and is

- [] reported at _____; or,
[] has been designated for publication but is not yet reported; or,
 is unpublished. *- see ATTACHED*

The opinion of the United States district court appears at Appendix B to the petition and is

- [] reported at _____; or,
[] has been designated for publication but is not yet reported; or,
 is unpublished. *- see ATTACHED*

For cases from **state courts**:

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

- [] reported at _____; or,
[] has been designated for publication but is not yet reported; or,
[] is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

- [] reported at _____; or,
[] has been designated for publication but is not yet reported; or,
[] is unpublished.

JURISDICTION

For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was MARCH 28, 2025.

No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

For cases from **state courts**:

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

A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A _____.

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

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

6th Amendment to the U.S. Constitution

STATEMENT OF THE CASE

DESPITE A PAUCITY OF ANY EVIDENCE, PETITIONER PLED GUILTY TO DISTRIBUTING A CONTROLLED SUBSTANCE et al. PAGE 3 OF SAID AGREEMENT: "THAT AS A MATERIAL CONDITION" OF THE PLEA, THE GOVT WITHDRAWS THE FLING OF AN ENHANCEMENT UNDER 21 U.S.C. 851. "FOR ONE OR MORE PRIOR SERIOUS DRUG CONVICTIONS."

THIS WAS EXPLAINED TO THE DEFENDANT AS "THEY WON'T ENHANCE YOU FOR YOUR PRIOR CONVICTIONS."

AT SENTENCING, TITTLE WAS "CAREERED" USING HIS PAST FELONY CONVICTIONS. PETITIONER ASSERTS HE DID NOT KNOWINGLY NOR INTELLIGENTLY SIGN THE PLEA AGREEMENT. IT'S THAT SIMPLE.

REASONS FOR GRANTING THE PETITION

BECAUSE "[A] GUILTY PLEA OPERATES AS A WAIVER OF IMPORTANT RIGHTS," IT IS CONSTITUTIONALLY VALID "ONLY IF DONE VOLUNTARILY, KNOWINGLY, AND INTELLIGENTLY, 'WITH SUFFICIENT AWARENESS OF THE RELEVANT CIRCUMSTANCES AND LIKELY CONSEQUENCES.'" *BRADSHAW v. STUMPF*, 545 U.S. 175, 183, 125 S. Ct. 2398, 162 L. Ed. 2d 143 (2005) (citing *BRADY v. UNITED STATES*, 397 U.S. 742, 748, 90 S. Ct. 1463, 25 L. Ed. 2d 747 (1970)).

SINCE PETITIONER THOUGHT THIS PLEA AGREEMENT WOULD NOT
HAVE ANY SENTENCE ENHANCEMENT USING HIS PRIOR FELONY CONVICTIONS,
AND THEN WAS "CAREERED" USING THESE SAME CONVICTIONS, THE
PLEA AGREEMENT WAS NOT SIGNED "KNOWINGLY AND INTELLIGENTLY."

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Michael S. Hill

Date: 6/23/25