

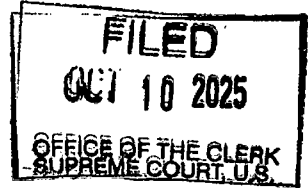
No. _____

25-5931

ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES



CALEB CAMPBELL — PETITIONER
(Your Name)

vs.

TERRY PRUITT — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

United States Court of Appeals Seventh Circuit
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Caleb Campbell
(Your Name)

5835 State Route 154
(Address)

Pinckneyville, IL, 62274
(City, State, Zip Code)

(Phone Number)

QUESTION(S) PRESENTED

I. Whether Campbell is time barred from filing his substantive Due Process Claim where he waited until the trial court found him not guilty of Aggravated Fleeting or Attempting to Elude A Police Officer prior to filing a Due Process Claim for the Police Destroying his car in a high speed chase that officers induced? Campbell only waited because clearly established federal law states that any claim that would cause the federal court to make a ruling that interferes with the state process should be filed after the state has concluded its proceedings.

II. whether Campbell should be granted leave to proceed on appeal in forma pauperis?

II. whether Campbell's substantive Due Process rights to property was violated?

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:

Terry Pruitt

Brian Pierce Jr. Estate

Nicholas Hensley

Brooklyn Police Department

Venice Police Department

Illinois

St. Clark County

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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☒ is unpublished.

The opinion of the United States district 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☐ is unpublished.

☐ 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 July 15, 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

USCA 5 - No person shall "be deprived of life, liberty, or property, without due process of law;"

USCA 4 - The right of people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrants shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the ~~things~~ persons or things to be seized.

USCA 14 "No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny ~~any~~ to any person within its jurisdiction the equal protection of the laws."

Constitution of State of Illinois Preamble

We, the People of the State of Illinois - grateful to Almighty God for the civil, political and religious liberty which He has permitted us to enjoy and seeking His blessing upon our ~~endeavors~~ endeavors - in order to provide for the health, safety and welfare of the people; maintain a representative and orderly government; eliminate poverty and inequality; assure legal, social and economic justice; provide opportunity for the fullest development of the individual; insure domestic tranquility; provide for the common defense; and secure the blessings of freedom and liberty to ourselves and our posterity - do ordain and establish this Constitution for the State of Illinois.

Constitution of Illinois Article I - Bill of Rights
Section 1. Inherent and INALIENABLE Rights

All men are by nature free and independent and have certain inherent and inalienable rights among which are life, liberty and the pursuit of happiness. To secure these rights and the protection of property, governments are instituted among men, deriving their ~~powers~~ just powers from the consent of the governed.

Section 2 Due Process And Equal Protection

No person shall be deprived of life, liberty or property without due process of law nor be denied the equal protection of the laws.

625 ILCS 5/11-204 (a)

"The signal given by the peace officer may be by hand, voice, siren, red or blue light. Provided, the officer giving such signal shall be in police uniform, and, if driving a vehicle, such vehicle shall display illuminated oscillating, rotating or flashing red or blue lights with when used in conjunction with an audible horn or siren would indicate the vehicle to be an official police vehicle.

625 ILCS 5/11-204.1 (a)

The offense of aggravated fleeing or attempting to elude a peace officer is committed by any driver or operator of a motor vehicle who flees or attempts to elude a peace officer, after being given a visual or audible signal by a peace officer in the manner prescribed in subsection (a) of section 11-204 of this Code.

720 ILCS 5/7-13 Necessity

Conduct which would otherwise be an offense is justifiable by reason of necessity if the accused was without blame in occasioning or developing the situation and reasonably believed such conduct was necessary to avoid public or private injury greater than the injury which might reasonably result from his own conduct.

50 ILCS 706/10-20 (3)

Cameras must be turned on at all times when the officer is in uniform and is responding to calls for service or engaged in any law enforcement-related encounter or activity that occurs while the officer is on duty.

"If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same; "

18 U.S.C. Sec. 242

"Who ever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any state, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States"

County of Sacramento v. Lewis, 118 S.Ct. 1708, 523 U.S. 833, 140 L.Ed.2d 1043 (1998)

"Such chases with no intent to harm suspects physically or to worsen their legal plight do not give rise to substantive due process liability."

Preiser v. Rodriguez, 411 U.S. 475, 93 S.Ct. 1827, 36 L.Ed.2d 439, 1973

"Since respondents' actions would neither interrupt a state judicial proceeding nor, even if successful, require the invalidation of a state judicial decision, "the question is simply whether one court or another is going to decide the case."

Heck v. Humphrey, 512 U.S. 477, 486-87, 114 S.Ct. 2364, 129 L.Ed.2d 383 (1994) a prisoner may not recover damages in a section

~~1983~~ 1983 suit where the judgment would necessarily imply the invalidity of his conviction, continued imprisonment or sentence unless the conviction is reversed, expunged or called into question by issuance of a writ of habeas corpus.

STATEMENT OF THE CASE

On August 4, 2021 at approximately 2:58 a.m. Officer Terry Pruitt targeted my vehicle as he watched it exit the Bottoms Up Parking lot. Pruitt instantly began to pursue my vehicle with the intent to worsen the legal plight of my vehicle. Pruitt delayed activating his dash camera to conceal the fact that he induced the high speed driving. See (Pruitt's Dash Camera) presented at trial as (People's Ex. 4) To induce my vehicle to proceed at a high rate of speed he violently chased my vehicle down almost striking the rear at this time he had made no indication that he was an officer. ~~After my~~ This is a high crime area, Pruitt said this himself. (R.218) So Pruitt knew that his actions would cause the car to pick up speed because the occupants would be in fear for their lives. After my car increased speed Pruitt sped up even faster and ~~even~~ still made no indication that he was an officer. At this point the only option the driver of my vehicle had was to try their hardest to get away to prevent being harmed. My vehicle went around a SUV that was sitting at the stop sign for a substantial amount of time making no attempt to proceed. Then the driver of my vehicle accelerated on Route 3 at a high rate of speed. Pruitt then activated his lights which automatically activated his dash camera and the dash camera is equipped with prerecording technology which captured moments prior to Pruitt activating his lights. (People's Ex 4) Pruitt never activated his siren

in conjunction with his emergency lights which is required by Illinois law to indicate that his vehicle is an official Police vehicle, (625 ILCS 5/11-204(a)) (R.613)

~~Thereafter, once the appearance of~~ Pruitt contacted Officer Brian Pierce Jr. whom had just terminated a different high speed pursuit in fear for the safety of the motoring public. (R8-RA) Pruitt told Pierce that he had a car fleeing from him. Officer Pierce was on the McKinley Bridge along with Officer Nicholas Hensley when Pierce was notified.

Pierce Decided that he was going to spike my vehicle. Deploying spike strips on a bridge is prohibited by the Village of Brooklyn Police Department Policy. Pierce informed Hensley that Pruitt was chasing a vehicle and that he was going to deploy spikes. Hensley made no attempt to intervene with he had a duty to do so with the area being in Venice which was his jurisdiction and not Pierce's nor Pruitt's. Instead Hensley went and hid on the passenger side of his ~~own~~ police vehicle and purposely failed to activate his dash camera.

Pierce wasn't wearing his dash camera because he left it at home. Pierce wasn't on duty that night he came in just to help Pruitt. I found this out from the local news. Pierce instructed all the civilian traffic to move as far as they could to the right, putting them all at risk of being struck. The guidelines for Stop Stick

(the brand of spikes that were used) states that officers should limit the amount of traffic. (See STOP STICKS Guidelines)
Pierce then went and hid inbetween Hensley's vehicle and civilian Timothy King's vehicle so the approaching vehicle would not know that he was present and he could spike my vehicle by surprise. Neither Pierce or Hensley had their emergency lights activated, so the driver of my vehicle had no idea police officers were trying to stop them. (R16) Pierce ended up throwing the spikes into the roadway ultimately ~~sp~~ deploying the spikes on the wrong vehicle. After that Pierce emerged from his hiding spot, ran out into the roadway, bent down to pick up the spikes and was struck with caused him to fly into the air. (R8-R9) The state alleged that my vehicle struck Pierce but eye witness said that it was a black SUV. The Illinois state police forced Timothy King to change his statement and destroyed his first one. I filed a FOIA to try and obtain his original statement but they refused to provide it.
King's passenger said that it was a black SUV that struck Pierce for sure. Due to the fact that I was involuntarily intoxicated I don't know for sure if Pierce was initially struck by a different vehicle and flew into my vehicle or if Pierce jumped out in front of my vehicle, But either way his actions combined with Pruitts caused a fatal accident where unfortunately Pierce lost his life God rest his soul and my vehicle was totaled. None of this would of happened if Pruitt didnt create exigent circumstances and Pierce didnt conspire. Pruitt knew that inducing my vehicle would put lives in danger and he knew Pierce wasnt trained

on how to properly handle stop sticks and Pruitt knew that Pierce would be deploying spikes on the bridge because this is a common practice that the Brooklyn Police Department and Venice Police Department does. (R 265, R 272-R 273)

The Village of Brooklyn Police Department failed to train Officer Brian Pierce Jr., They allow their officers to commit perjury and other misconduct. I filed several reports to their department complaining about how Officer Terry Pruitt made false reports stating: that he observed my vehicle exit Bottoms Up Parking lot ~~at~~ in a reckless manner which is why he began to pursue my vehicle. Pruitt went on to commit perjury on the stand at trial stating: He observed my vehicle exit the parking lot in a reckless manner, then disobey the stop sign posted on 2nd and Madison then accelerate at speeds up to 60 mph. Pruitt lied and said he activated his sirens and alleged that my car drove up a curb. Bottoms Up Cameras and his dash camera reflects that these are lies. I ~~was~~ had loved ones post the proof on social media and the public was shocked that officers of the law were allowed to deliberately deprive citizens of their rights and be rewarded for it.

The City of St. Clair County has knowledge that

The Village of Brooklyn Police Department is corrupt but fail to take action.

The Venice Police Department failed to train Hensley not to lie in police reports, not to commit perjury on the stand and to activate his body camera when he is engaged in police performances.

Hensley made a fals report stating that Pruitt was standing in the middle of the roadway the entire time, that he saw my vehicle strike Pierce and that he could see the "POLICE" lettering at eye level when Pierce was hit. Witnesses stated that Hensley was on the side of his vehicle when Pierce ~~committed an accidental homicide~~ ^{got hit} and he came out looking confused like he didnt know what happened. Hensley admitted that it happened so fast when he testified at trial after he told several lies on the stand. (R279)

The State of Illinois has allowed its officials to conspire to violate my rights and failed to take action after I notified the Attorney General and the Governor. The Courts participated in the conspiracy by allowing the officers and prosecutors to use known perjury, manufactured evidence etc. All parties failed to supervise.

I filed my 1983 complaint on 08/15/2024 less than 2 years after I was found not guilty of Fleeing and Eluding December 15, 2022.

On August 15, 2024 the District Court delivered a Notice and Order stating that the complaint was filed. I waiting over 4 months for a Merit review.

January 9, 2025 the Court dismissed the complaint with prejudice stating that it was time barred.

I timely appealed to the United States Court of Appeals whom dismissed my appeal because I could not afford to pay. Now im praying to this Court for justice.

REASONS FOR GRANTING THE PETITION

The lower Courts made the incorrect decision. My Substantive Due Process Rights were violated by state officials whom are supposed to protect and serve. This Court made a ruling in *County of Sacramento v. Lewis*, 118 S.Ct. 1208, 523 U.S. 833, 140 L.Ed. 2d 1043 (1998), making it clear that when officers perform chases with intent to worsen the legal plight of citizens that gives rise to Substantive Due Process liability. Therefore I am entitled to compensation.

The United States Court of Appeals dismissed my appeal because I could not afford to pay the filing fee. I am indigent and have been granted leave to proceed in forma pauperis on numerous occasions. My mental state is unstable and has been unstable for the last 4 years especially so I was not competent enough to efficiently file motions ~~and~~ etc. as a professional would. Also I lack the knowledge and training of a professional. I believe these factors should be considered.

This Court is my only hope

My family has recieved numerous threats.

CONCLUSION

I Caleb Campbell respectfully requests that this Court grant this petition.

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Caleb Campbell

Date: 08/04/2025