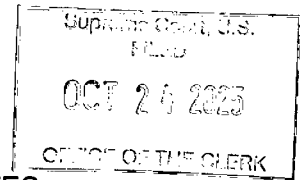


25-6190

No. _____

ORIGINAL
FILED



IN THE

SUPREME COURT OF THE UNITED STATES

STEVEN DALE BRADLEY — PETITIONER
(Your Name)

vs.

STATE OF IOWA,
GOVERNOR - KIM REYNOLDS RESPONDENT(S)
ATTORNEY GENERAL - BRENNIA BIRD
ON PETITION FOR A WRIT OF CERTIORARI TO

THE SUPREME COURT OF IOWA
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

STEVEN DALE BRADLEY #0207216
(Your Name)

I.S.P. - P.O. Box 316
(Address)

Fort Madison, Iowa 52627
(City, State, Zip Code)

N/A
(Phone Number)

QUESTION(S) PRESENTED

1. Do inmates have a constitutional right to be notified of sentencing provisions that have direct relations to their sentences?

2. Do inmates have a constitutional right to expect fulfillment of all promises, including futuristic, in written plea agreements?

3. Should a Mandamus give authority to the Higher Court to enforce the State and lower court to fulfill their plea agreement promises?

4. How can inmates enforce futuristic plea agreement promises, when the State and court refuse to honor them?

5. If my concurrent sentence was not permitted per Statute, Iowa Code Section 903A.5 (1993), is it required for my sentence to be vacated?

6. Did I have a right to believe that my appeal rights were preserved according to the verbiage of Paragraph 12, of the written plea agreement?

7. Did the State breach their plea agreement by not appointing counsel in any and all future proceedings as promised in Paragraph 12, of the written plea agreement?

8. Where a plea agreement calls for concurrent sentences not permitted by Statute, and that Statute later Amended to conditionally permit concurrent sentences, does the Amendment itself breach the

Questions Presented cont.

agreement where the agreement states that no additional terms or documents shall be added to or taken from the agreement without nullifying it in its entirety and any breach thereof nullifies the agreement in its entirety?

9. Where the State promises in a co-defendants plea agreement to give any statements made by that co-defendant to all other defendants in the case, do those other defendants have a right to expect fulfillment of that promise, even without request, especially where said statements are exculpatory?

10. From question 9 above, does that qualify as a Brady Violation and is reversal of the sentence and conviction required if the State fails to fulfill that promise before trial or plea?

11. Do any of the aforementioned questions deprive me of life, liberty or property without due process of law, per 5th and 14th U.S. Constitution Amendments? And Article I, Section 9, of Iowa Constitution?

12. Do any of the aforementioned questions deprive me of effective counsel per the 6th U.S. Constitution Amendment? Article I, Section 10 of the Iowa Constitution?

13. Do any questions and obviously answers deny me equal protection of the laws per U.S. Constitution 14th Amendment?

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

- State of Iowa vs. Steven Dale Bradley, No. 25-1263, In the Supreme Court of Iowa, Judgment entered August 12, 2025.
- State of Iowa vs. Steven Dale Bradley, No. FECK 081231, In the District Court of Iowa for Polk County, Fifth Judicial District. Judgment entered on or about July 9, 2025.
- Steven Bradley vs. John Ault, Case 4:04-cv-40367-JEG-RAW, In the United States District Court for the Southern District of Iowa, Central Division. Judgment entered June 3, 2008.

RELATED CASES Cont.

- State of Iowa vs. Steven Dale Bradley, No. 03-755, Polk County No. FECR 081231, In the Supreme Court of Iowa. Judgment entered February 25, 2004
- State of Iowa vs. Steven D. Bradley, case no. FECR 081231, In the Iowa District Court for Polk County, Fifth Judicial District. Judgment entered March 12, 2003.
- Steven D. Bradley vs. State of Iowa, case no. CE 32313, In the Iowa District Court for Polk County, Fifth Judicial District. Judgment entered February 16, 1998.
- State of Missouri versus Steven Dale Bradley, No. CR 295-45FX, In the Circuit Court of Missouri for Clark County, Division One. Judgment entered February 9, 1995.

TABLE OF CONTENTS

QUESTIONS PRESENTED	i
PARTIES TO THE PROCEEDINGS / RELATED CASES	iii
TABLE OF CONTENTS	v
TABLE OF AUTHORITIES	xii
PETITION FOR WRIT OF CERTIORARI	1
OPINIONS AND ORDERS BELOW	1
STATEMENT OF JURISDICTION	2
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED	3
STATEMENT OF THE CASE	6
REASONS FOR GRANTING THE PETITION	11
CONCLUSION	32
PROOF OF SERVICE	33

INDEX TO APPENDICES

State of Iowa vs. Steven Dale Bradley, No. 25-1263,
In the Supreme Court of Iowa. Judgment entered on
August 12, 2025. App. 1

State of Iowa v. Steven Dale Bradley, No. FEGR
081231, In the Iowa District Court for Polk County,
Fifth Judicial District. Judgment entered on or
about July 9, 2025. App. 3-5
Notice of Appeal App. 5A-5G

State of Iowa vs. Steven Dale Bradley, No. 25-1263,
Request for Three Panel Justices Review, In the Supreme
Court of Iowa. Judgment entered

_____ App. 6A-6E
Ruling/order _____ App. 6F-6G

Steven Bradley vs. John Ault, case 4:04-cv-
40367-JEG-RAW, In the United States District
Court for the Southern District of Iowa, Central
Division. Judgment entered June 3, 2008 _____ App. 7

State of Iowa vs. Steven Dale Bradley, No. 03-755,
Polk County No. FECR 081231, In the Supreme Court
of Iowa, Judgment entered February 25, 2004. _____
_____ App. 14

State of Iowa v. Steven D. Bradley, Polk County No.
FE 81231, Supreme Court No. 03-755, Motion for Leave
to Withdraw, In the Supreme Court of Iowa, Filed
May 30, 2003. _____ App. 16

State of Iowa v. Steven D. Bradley, case no.
FECR 081231, In the Iowa District Court for Polk County,
Fifth Judicial District. Judgment entered March
12, 2003. _____ App. 25

Steven D. Bradley vs. State of Iowa, Case No.
CE 32313, In the Iowa District Court for Polk County,
Fifth Judicial District. Judgment entered February 16,
1998. _____ App. 29

Iowa Code Annotated Section 903A.5 (1994) _____ App. 36

Iowa Code Annotated Section 903A.5 (2003) _____ App. 38

Transcript Pages from the Circuit Court, Clark County,
Missouri, based on the same case herein _____ App. 41

Missouri Department of Corrections Face Sheets dem-
onstrating receiving credit on Missouri sentence
since February 9, 1995, violating 903A.5 (1993) Iowa
Statute _____ App. 44

Caselaw: State v. Iowa Dist. Court for Mitchell
County, 471 N.W.2d 802 (1991) _____ App. 49

Caselaw: State v. Hallock, 765 N.W.2d 598 (2009) _____
_____ App. 50

Transcripts from the January 31, 1995, Guilty Plea
Negotiations _____ App. 54

Court Order demonstrating that the January 31, 1995,
Plea Negotiations were transcribed for the first time
in September of 2000 _____ App. 61

Transcripts from the December 5, 1997, Postconviction
Hearing _____ App. 63

The Iowa Written Plea Agreement in case No. F&CR
081231 _____ App. 67

Transcripts from the Iowa Guilty Plea Colloquy case
No. F&CR 081231 _____ App. 75

Iowa Sentencing Order, No. F&CR 081231 _____ App. 83

Two pages from Co-defendant Garland Shaffer's Motion
To Sever, No. 81232 _____ App. 85

Transcripts from the December 5, 1997, Postconviction
Hearing _____ App. 87

Pages from co-defendant Garland Shaffer's written plea
agreement in Iowa, No. 81232 _____ App. 90

Pages from co-defendant Garland Shaffer's written
plea agreement in Missouri, No. CR 294-207 FX _____
_____ App. 93

An October 19, 1994, Deposition of Garland Shaffer,
co-defendant (relevant pages) _____ App. 97

Transcript pages from co-defendant Garland Shaffer's
Guilty plea Hearing (IA) _____ App. 106

Transcript pages from co-defendant Garland Shaffer's
Guilty plea Hearing (mo) _____ App. 114

Handwritten Facts of the case offered for polygraphs
_____ App. 119

Angel Stewart's written Iowa plea agreement _____ App. 139

Angel Stewart Iowa Sentencing ORDER _____ App. 145

Letter from Lisa D. McGee, mo Public Defenders
Office _____ App. 147

Letter from Missouri Prosecutor to Bradley's Missouri
Attorney, John Lowe _____ App. 148

Bradley's Missouri sentencing _____ App. 149

Missouri attorney, John Lowe's Discovery _____ App. 151

X

A June 27, 1994, Preliminary Complaint against petitioner as a Material Witness _____ App. 153

An Arrest Warrant for petitioner as a Material Witness on June 27, 1994 _____ App. 154

Pages from Iowa Code Chapter 804 _____ App. 155

A page from the December 5, 1997, Postconviction Hearing where Attorney, William Thomas acknowledges that his client (petitioner herein) was questioned at the courthouse by police at the place of arrest _____ App. 158

Search Warrant pre-arrest - note Magistrate available at place of arrest where petitioner questioned by police
_____ App. 159

Note items sought for App. 159, Search Warrant = whereabouts of petitioner (pre-arrest) _____ App. 160

Return of Service on App. 159 Search Warrant on same day as arrest = shows same Magistrate available = no reason not to comply with Chapter 804 _____ App. 161

Notice Initial Appearance has nothing to do with Material Witness _____ App. 162

Caselaw; State v. Brady, 130 Wis.2d 443 (1986); 388 N.W.2d 151 = shows illegal arrest where no evidence that petitioner was unavailable for service of subpoena, App. 100, clearly demonstrates we were on our way back to Des Moines, to my residence _____ App. 163

XII

TABLE OF AUTHORITIES CITED

CASES	PAGE NUMBERS
Brady v. Maryland, 373 U.S. 83, 83 S.Ct. 1194, 10 L.Ed.2d 215	passim/entirely
Christensen v. Iowa District Ct., 578 N.W.2d 675, 678 (Iowa 1998)	12
Johnson v. Mitchell, 489 N.W.2d 411 (App. IA 1992).	
	11, 23, 26, 27
Johnson v. United States, 529 U.S. 694 (2000)	11A
Lafler v. Cooper, 566 U.S. _____, (2012) (3-16)	
	11, 23, 26, 27
Landgraf v. USI Film Prods. 511 U.S. 244 (1994)	11A
State v. Cuevas, 282 N.W.2d 74 (1979)	29
State v. Hall, 235 N.W.2d 702 (1975)	30
State v. Hallock, 765 N.W.2d 598, 602 (2009)	
	11, 23, 26, 27
State v. Houston, 209 N.W.2d 42 (1973)	30
State v. Iowa Dist. Ct., 828 N.W.2d 607, 611 (Iowa 2013)	12
State v. Iowa Dist. Court for Mitchell County, 471 N.W.2d 802, 803 (1991)	12

XIII

State v. Johnson, 298 N.W.2d 293 (1980) — 30

State v. McClain, 125 N.W.2d 764 (1964) — 29

State v. Ohnmacht, 342 N.W.2d 838, 845
(Iowa 1983) — 11, 23, 26, 27

State v. Peterson, 219 N.W.2d 665 (1974) — 29

State v. Ross, 729 N.W.2d 806, 809 (Iowa 2007) — 11, 23, 26, 27

State v. Shilinsky, 248 Iowa 596,
81 N.W.2d 444 (1957) — 11, 23, 26, 27

State v. Trammel, 458 N.W.2d 862, 864
(Iowa App. 1990) — 12

State v. VanRees, 246 N.W.2d 339 (1976) — 30

State v. West, 326 N.W.2d 316 (1982) — 11, 23, 26, 27

CONSTITUTION

Iowa Constitution, Article I, Sections
9, 10, and 21 — Entirely

U.S. Constitution, Amendments 5, 6, and 14 — Entirely

XIV

STATUTES AND RULES

Iowa Code Chapter 709 _____ 13

Iowa Code Chapter 804.23 _____ 6

I.C.A. 903A.5 (1994) _____ passim

I.C.A. 903A.5 (2003) _____ passim

Iowa Code 903B.2 _____ 13, 26

I.C.A. Rule 2.24 (5)(a) _____ 11, 23, 26, 27

I.C.A. Rule 6.101 _____ 11, 23, 26, 27

I. R. App. P. 6.104 _____ 19, 20

~~IN RE: JAMES EARL RAY~~ I. R. Civ. P. 1.1401 _____ 12

I. R. Cr. P. Rule 23 (5)(a) _____ 11, 23, 26, 27

~~IN RE: JAMES EARL RAY~~

OTHER

Contract Laws K 155 _____ 17

~~XXXX~~

XV

1983 Iowa Acts Chapter 147, section 6 _____ 12

28 U.S.C. § 1257 (a) _____ 2

1

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 _____ 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 1-2 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 Iowa District court appears at Appendix 3 to the petition and is

- ☐ reported at 3-5; 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 _____.

☐ 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 August 12, 2025.
A copy of that decision appears at Appendix A 1-2.

☐ A timely petition for rehearing was thereafter denied on the following date: September 30, 2025, and a copy of the order denying rehearing appears at Appendix A 6F-6G.

☐ 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

The Fifth Amendment of the United States Constitution provides:

"No person shall... be deprived of life, liberty or property without due process of law..."

The Sixth Amendment of the United States Constitution provides:

"In all criminal prosecutions, the accused shall... have the assistance of counsel for his defense."

The Fourteenth Amendment of the United States Constitution provides:

"... nor shall any state deprive any person of life, liberty or property without due process of law, nor to deny to any person within its jurisdiction the equal protection of the laws."

The Code of Iowa Section 903A.5 (1993) provides:

"... An inmate shall be deemed to be serving the sentence from the day on which the inmate is received into the institution..."

An inmate shall not receive credit upon the inmate's sentence for... time served in an institution or jail of another jurisdiction during any period of time the person is receiving credit upon a sentence of that other jurisdiction."

CONSTITUTIONAL AND STATUTORY PROVISIONS
INVOLVED CONT.

The Code of Iowa Section 903A.5 (2000) Amendment provides:

"... an inmate may receive credit upon the inmate's sentence while incarcerated in an institution or jail of another jurisdiction during any period of time the person is receiving credit upon a sentence of that other jurisdiction."

The Constitution of Iowa, Article I, Section 9 provides:

"... but no person shall be deprived of life, liberty or property without due process of law."

Article I, Section 10 provides:

"... to be informed of the accusation against him... and, to have the assistance of counsel."

Article I, Section 21 provides:

"No bill of attainder, ex post facto law, or law impairing the obligation of contracts, shall ever be passed."

The Fourteenth Amendment of the United States Constitution provides:

"No state shall make or enforce any law which

CONSTITUTIONAL AND STATUTORY PROVISIONS
INVOLVED CONT.

shall abridge the privileges or immunities of citizens
of the United States..."

STATEMENT OF THE CASE

First I want to identify that Appendix's 153 through 171, are there to illustrate my illegal arrest. There was no evidence presented that I was unavailable for service of subpoena and we know this without even seeing the Application for Search Warrant on June 27, 1994, the same time they issued the Material Witness Complaint and Arrest Warrant, because the Application for Search Warrant was for the residence I was living at in Des Moines, IA, and no police had been by to even try to contact me.

And being a Material Witness is not an identified misdemeanor or felony in the Iowa Code. It is not a crime.

And those Appendix's clearly reflect that there was a Magistrate available to honor Iowa Code Section 804.23 and they did not. Nor was I ever informed by the arresting officers that I was a witness to any identified felony nor that I might be unavailable for service of subpoena and I was on my way back to that residence in Des Moines. (See Appendix 100) (And I was questioned by police in a courtroom in the same courthouse as the available Magistrate.

Anyway, I just felt it was important to show this United States Supreme Court my arrest.

while in jail, William D. Thomas, herein after, Mr. Thomas, was appointed to represent me on the Iowa charges. There was communication between the States, Iowa and Missouri because co-defendant Shaffer took Phyllis King to Missouri and killed her there. Shaffer killed Clara Baker in Iowa and both women were kidnapped by Shaffer and Stewart in Iowa.

Missouri started threatening me with the death penalty in their State and from that time and forward, I could not see Mr. Thomas without him threatening me with the death penalty and there were several things Mr. Thomas lied to me about that broke any trust I had in receiving a fair trial by jury.

It's important to note here that at the December 5, 1997, Postconviction Hearing, Mr. Thomas led to, by lying to the PCR Court to believe that he wanted me to go to trial and not take the offered plea agreement and also that he didn't remember me asking, actually demanding my appeal. See App. 29-35.

However, the truth comes out in App. 54-60, where Mr. Thomas is again threatening me with the death penalty along with the State and where I make it perfectly clear that I will only proceed with a plea deal [if] my

sentences are concurrent and my appeal rights preserved. That was on January 31, 1995, the day before the February 1, 1995, Guilty plea. App. 54-60. And the Iowa written plea agreement, see App. 67-74, promises and guarantees both of my demands for the plea, the concurrent sentences in paragraph 13, of that Appendix and my future appeals with effective appointed counsel in paragraph 12 of that Appendix.

And in the guilty plea colloquy, App. 75-82, it is shown on transcript page 3, [that Mr. Thomas [prepared me] with what to tell the court in order for the court to accept my plea. Very important to know.] The purpose of this agreement was initially to avoid the death penalty which at the January 31, 1995, plea negotiations, App. 54-60, ~~did not~~ became obsolete to the concurrent sentences and preservation of my appeal rights because I knew I was innocent and I believed with concurrent sentences, I would have to fight only one appeal. See App. 63-66.

I believe it was October of 1995, when I first filed my postconviction in Iowa and at that time I argued my sentence illegal and not concurrent because Missouri was denying me the right to proceed on appeal, stating that because I had never been physically delivered to the

Missouri Department of Corrections to initiate my sentence they did not have subject matter jurisdiction to hear my appeal. Therefore, how could my sentences be concurrent?

Then in 2003, is when Iowa Code Section 903A.5 (1993) was discovered and other laws to show that this argument is ripe at any time of incarceration and that until a valid final judgment is entered the District Court retains jurisdiction of this case and that there can be no law of the case nor any appeal unless there is a valid final judgment, of which in this case it is still believed that there is not.

All rulings since, have been contrary to the Iowa Statute 903A.5 (1993).

The prior Missouri Rulings under Missouri Law have no stake in Iowa's responsibilities of their own Laws, not Missouri's, and the Missouri Face Sheets, App. 44-48, clearly reflect that my sentence in Missouri has been being served and receiving credit on that sentence since February 9, 1995, and that I was issued a Missouri DOC number, 513462, as evidence of my incarceration credit on that sentence and as long as I am receiving credit on that sentence, the Iowa Court had no jurisdiction or authority to bind itself to concurrent sentences violating

Iowa Code Section 903A.5 (1993) and the 2000 Amendment of that Statute violates the written plea agreement that disallows any additions or subtractions from it's contents without nullifying it in its entirety of which I believe has already been done many times over.

And I am still trying to figure out how both States can incorporate each other many times in their written plea agreements to join forces to convict, but when it comes to reverse, it appears neither State has any jurisdiction or authority about the other State.

And I have tried from the day of my arrest to take polygraphs to prove my actual innocence in spite of the documented exculpatory evidence attached herein, I still want the polygraphs to prove that I had absolutely zero mens rea as to any element of any of the crimes charged, I was never a willing participant to any of this and I told the States, choose your own polygraph examiner, I have nothing to hide. I even tried contacting Larry Farwell for the Brainwave Test.

I have been wrongfully convicted and under an illegal sentence for 31 years - when do I get to see Justice - the equal balance of the scales?

REASONS FOR GRANTING THE PETITION

First, I want to cite relevant case law from the record below:

Sentencing court is bound to impose a sentence prescribed by Statute. Sentence not permitted by Statute is void. Void sentences are not subject to the usual concepts of waiver, whether from a failure to seek review or other omissions of error preservation and thus time for appeal does not begin to run until a valid judgment is entered. *State v. Hallock*, 765 N.W.2d 598, 602 (2009); *State v. Ohnmacht*, 342 N.W.2d 838, 845 (Iowa 1983); I.C.A. Rule 2.24 (5)(a); I.C.A. Rule 6.101; *State v. Ross*, 729 N.W.2d 806, 809 (Iowa 2007); I. R. Cr. P. Rule 23 (5)(a).

The Iowa district court retains jurisdiction until a valid final judgment is entered. *State v. Shilinsky*, 248 Iowa 596, 81 N.W.2d 444 (1957); Illegal sentence demonstrates prejudice for ineffective counsel. *Lafley v. Cooper*, 566 U.S. _____ (2012) (3-16);

Void judgment can be had without or in excess of the court's jurisdiction. *Johnson v. Mitchell*, 489 N.W.2d 411 (App. IA 1992); Voluntary or intelligent nature of plea could be affected by any misstatement, placing in defendant's mind, "the flickering hope of a disposition on sentencing, that was not possible. *State v. West*, 326 N.W.2d 316 (1982)."

Ex post Facto clauses prohibits retroactive application of penal legislation.

Landgraf v. USI Film Prods., 511 U.S. 244, 114 S.Ct. 1483, 128 L.Ed. 2d 299, 8 Fla. Weekly Fed. 561, 94 Cal. Daily Op. Service, 2869, 94 D.A.R. 5525, 64 Empl. Prac. Doc. Cqs. (BNA) 820, 1994 U.S. LEXIS 3292 (1994);

Johnson v. United States, 529 U.S. 694, 120 S.Ct. 1795, 146 L.Ed. 2d 727, 13 Fla. Weekly Fed. S. 308, 2000 Cal. Daily Op. Service, 3775, 2000 Colo. J. C.A.R. 2679, 2000 D.A.R. 5043, 2000 U.S. LEXIS 3135 (2000).

The aforementioned is another reason petitioner believes that the 2000 Amendment of Iowa Code § 903A.5, cannot apply to petitioner.

Certiorari is appropriate when a lower court or tribunal has exceeded its authority or otherwise acted illegally. State v. Iowa Dist. Ct., 828 N.W.2d 607, 611 (Iowa 2013); see also I.R.Civ.P. 1.1401. Illegality exists... when the court has not properly applied the law. Christensen v. Iowa Dist. Ct., 578 N.W.2d 675, 678 (Iowa 1998).

The 1983 Amendment to Iowa Code Section 903A.5 which Amendment was included in 1983 Iowa Acts Chapter 147, section 6, provided in pertinent part as follows: "An inmate shall not receive credit upon the inmates sentence... for time served in an institution or jail of another jurisdiction during any period of time the person is receiving credit upon a sentence of that other jurisdiction. App. 36-37, See State v. Iowa Dist. Court for Mitchell County, 471 N.W.2d 802, 803 (1991); App. 49; the Court of Appeals observed that the language of 903A.5, is a mandate, State v. Trammel, 458 N.W.2d 862, 864 (Iowa App. 1990).

If you observe App's 44-48, Missouri Department of Corrections, Face Sheets, you will observe that on App. 44, clearly demonstrates that I was committed into their institution on paper in 1995 and given Register No. 513462 (my inmate no.), and at the bottom of App. 44, it shows that I am serving my Missouri sentence concurrent with Iowa and App. 45 shows that I was

deemed received into the institution on February 9, 1995 and that my sentence is active, thus, receiving credit on that sentence in violation of Iowa Code 903A.5 (1993)(1994).

App. 46, shows my Missouri Doc. No. 513462, received and committed on February 9, 1995;

App. 47, shows I am serving my Missouri sentence concurrent with Iowa's sentence and that I am incarcerated in Iowa.

App. 48, shows that I was sentenced and received into the institution on paper on February 9, 1995 and that my sentence calculation start date is of that same date and that my sentence is active.

(It shall be duly noted here that it is of no substance or consequence if Missouri deems their sentence concurrent with Iowa's - that does not constitute concurrent sentences from Iowa where their Statute 903A.5 (1994) prohibits such sentences), (this is petitioner's belief), and Iowa law only has power over ~~them~~ Iowa. App. 41-43, clearly reflects that as part of the plea agreement, it was agreed upon that Bradley serve his time in Iowa.

In State v. Hallock, 765 N.W.2d 598, 604, 605 (2009) App. 50-53, we find that Iowa Code 903B.2 is a sentencing provision for Iowa Code Chapter 709, which clearly illustrates that Iowa Code 903A.5 (1994) is a sentencing provision for any other Iowa

Criminal Code where there is an active sentence in any other jurisdiction, wherefore barring the Iowa Court from ordering concurrent sentences. Clearly demonstrating a consequence that is neither indirect nor collateral, but rather a consequence representing a definite, immediate, and largely automatic effect on the range of punishment. For one, Bradley's IA sentence has never started. Also see, App. 63-66, which clearly illustrates my understanding of concurrent sentences that I would receive as I was led to believe by trial counsel that I would then have only one appeal to contend with. I believed I would be released if successful on appeal and the truth is, it is legally impossible for my Iowa sentence to have ever been initiated due to Iowa Code 903A.5(1994) and I now have enough years in to be eligible for a pardon but because my sentence has never started I'd have no standing to file.

Next, I want to demonstrate the conditions, promises and guarantees of concurrent sentences and the preservation of appeal rights [or] we will go to trial,

App. 54-60, are extracts from the January 31, 1995, plea negotiations that clearly reflect threats of the Missouri death penalty by Iowa Prosecutors and my own trial attorney and I made it clear

that in spite of the death penalty threats, unless it is agreed upon that my sentences are concurrent and my appeal rights preserved - we will go to trial.

See App. 56, lines 23-25, App. 57, lines 1-2, App. 59, lines 19-20. It is also important to note that these plea negotiations were transcribed for the first time in September of 2000 and that these pages are in direct contrast to the Postconviction Ruling of 1998, App. 61-62 and App. 29-35, (Postconviction Ruling).

Then we have the Iowa written Plea Agreement App. 67-74, where I took the bracketed sentence of paragraph 12, App. 72, as to being the preservation of my appeal rights and in paragraph 13, App. 72, there is a concurrent sentence stipulation where it states that, "this sentence to be served with a similar life term... in the State of Missouri." So, under those, Bradley believed his two demands of concurrent sentences and preservation of appeal rights were fulfilled and assured. And paragraph 1, App. 67 and paragraph 16, App. 73, clearly reflect that nothing can be added to or taken from those terms and document without nullifying it in its entirety.

Next, is the guilty plea hearing of February 1, 1995, App. 75-82, and first I draw your attention to App. 77, lines 13-15, where trial counsel assures the court that he prepared Bradley with what to say in which to provide a factual basis for the plea.

Then on App. 78, line 25 - App. 80, line 3, it is in essence, established that there is no evidence of Bradley being guilty of murder and it is incorrectly stated that I aided and abetted Shaffer in transporting the women. I was a forced passenger in the car and nothing more. App. 79, lines 7-10,

And App. 80, lines 7-11 and App. 81, lines 7-10, you will see the court is acknowledging that I am hinging my plea on concurrent sentences and is willing to do so and in fact binds the court to concurrent sentences for Bradley. Keeping in mind that Bradley's plea was a Rule 9 plea, which required the court's compliance. All other forms of pleas at that time were Rule 8 pleas of which I had no part.

Then we have the sentencing ORDER, App. 83-84 and on App. 84, we clearly see the court ran my sentence concurrent to Missouri's violating Iowa Code 903A.5 (1994) as previously shown.

Now we are going to observe App. 38-40, which is the 2000 Amendment of Iowa Code 903A.5 (1994), which now states in pertinent parts: "However, an inmate may receive credit upon the inmate's sentence while incarcerated in an institution or jail of another jurisdiction during any period of time the person is receiving credit upon a sentence of that other jurisdiction. Note: the underlined is the change in the

Amendment, where the pre-Amendment stated, "An inmate shall not receive credit upon the inmate's sentence... ~~for~~ for time served in an institution or jail of another jurisdiction during any period of time the person is receiving credit upon a sentence of that other jurisdiction." Noting that, the Amendment requires physical custody in the other jurisdiction where the earlier Statute did not. However, it should be duly noted that I was fingerprinted at the jail in Kahoka, Missouri before going to court. Just saying that for the truth of the matter, not necessarily relevance.

Two other things that I want to address from the Iowa written plea agreement, App. 67-74, and on App. 72, the bracketed sentence discussed earlier as preservation of my appeal rights, also needs to be referenced about the promise of advice of effective counsel per the 6th Amendment of the U.S. Constitution in any and all future proceedings of which the courts refute, even upon request. My still being under an illegal sentence is strong evidence of this Breach. Also, it shall be duly noted, that under contract laws, of which plea agreements attach, it states that, "any ambiguity in the contract goes against the draftsman." K 155.

This section is going to address all the Rulings

that Bradley believes are erroneous.

The August 12, 2025, ORDER from the Iowa Supreme Court and only states, "Upon consideration, the petition is denied," without any assertion that Bradley's motion was actually observed. App. 1-2,

The July 9, 2025, Ruling from the Iowa District Court, Judge Joseph W. Seidlín, App. 3-5, for the argument against this, see the Notice of Appeal, App's 5A, 5B, 5C, 5D, 5E, 5F, and 5G.

After the August 12, 2025, ORDER, App. 1-2, Bradley filed a "Writ of Certiorari, Demand or Request for Three Justice Panel," of which will be identified as App. 6A-6G, pending the number of pages whether they actually grant it and hear the case or deny the demand or request, awaiting response, which will be App. 6H - 6 _____,

App. 7-8, is a two page letter from me to the clerk of the U.S. District Court and the main relevance here is the demand for the January 26 and 31, 1995, plea negotiations prior to making a Ruling. And then App. 9-13, is the Ruling from the U.S. District Court, App. 10, paragraph 2, starts the discussion of the illegal sentence and through paragraph 1, of App. 11, where the Magistrate incorrectly implies that Bradley has to be in custody in the other jurisdiction under 903A.5, pre 2000 Amendment, Bradley serving his time in Iowa under Iowa Code 903A.5 (1994) only states that, "for time served in the other jurisdiction for any time you

are receiving credit on the sentence of the other jurisdiction. Why the Amendment included "in custody" in the other jurisdiction, because the earlier Statute did not.

And in App. 11, paragraph 2, acknowledges that the Iowa and Missouri sentences could not be served concurrently and failed to have it corrected. Then the Magistrate says the Missouri death penalty was Bradley's concern (App. 54-60), clearly refutes that the death penalty was my concern where I had prosecutor's from both States and my own attorney threatening me with the death penalty and I tell them plainly, "if they do not give me concurrent sentences and preserve my appeal rights, we will go to trial," And it's funny how this Magistrate says Bradley's sentence under Iowa law is purely a matter for the Iowa courts, yet incorporates Missouri throughout. And then, App. 12, paragraph 1, the Magistrate states there was no promise to Bradley in the Iowa plea agreement that he would receive concurrent sentences. The Magistrate obviously did not read the Iowa plea agreement. App. 72, paragraph 13.

App. 14-15, is the February 25, 2004, ORDER from the Iowa Supreme Court and Bradley believes this ORDER is erroneous as will be demonstrated through the following arguments concerning, App. 14-28.

App. 16-17, Appellate counsel, David Arthur Adams, two page Motion For Leave To Withdraw based on I. R. App. P. 6, 104, calling Bradley's appeal frivolous.

Next, is Appellate counsel, David Arthur Adams brief that was attached to his Motion for Leave to Withdraw, Brief - App. 18-23.

App. 18, demonstrating a frivolous appeal under (Ia. R. App. P. 6.104).

App. 19, Adams agrees that Bradley's sentences were ordered to run concurrent with Missouri's. At the bottom of App. 19, and top of App. 20, Adams asserts that Bradley agreed to plead guilty to avoid the death penalty. (let it be duly noted that the death penalty became obsolete in comparison to concurrent sentences and preservation of appeal rights, App. 54-60.)

App. 20, Adams asserts that both States, Iowa and Missouri agreed to concurrent sentences. This is true. But Adams inaccurately asserts that the court personally advised Bradley of the elements of the offense of murder. This happened for Shaffer's plea, not Bradley's.

Adams also asserts that the court advised Bradley of the mandatory punishment - this is not true. The court never advised Bradley of the sentencing provision of Iowa Code 903A.5 (1994), that prohibits concurrent sentences. Then Adams claims Bradley does not directly challenge the plea in this matter. That too is false. A challenge to a guilty plea is a challenge to the sentence itself for one and I did specifically state a violation of the agreement.

Again on this same App. 20, Adams again asserts

that the court imposed the legislative mandated sentence of life in prison concurrent to Missouri's - again, the court failed to mention and failed to impose the legislative mandate of Iowa Code 903A.5 (1994), that would have certainly caused Bradley to go to trial and abort the plea, See App. 54-60, I was denied my trial rights.

App. 21, Here, Adams wrongfully states, "The language of the Statute 903A.5 (1993) does not specifically prohibit the district court from ordering that a sentence imposed in Iowa be served concurrent with the sentence imposed in another jurisdiction, particularly if the sentence is to be served in Iowa and the defendant has no claim of credit for time served in another jurisdiction."

First of all, 903A.5 (1993/1994), specifically prohibits concurrent sentences, App. 49, and this is in spite of geographical location of the inmate and this is evidenced by the Amendment in 2000, App. 38-40, which specifically made the change concerning geographical location of the inmate and of which Amendment has absolutely nothing to do with my sentence.

Then under this same App. 21, Adams asserts "Bradley spent no time in a Missouri institution for which he could have received credit and that after Bradley's plea and sentence in Iowa, Bradley was never incarcerated in Missouri."

As stated earlier, I was taken to the jail in Missouri before going to court and the Statute 903A.5

(1993/1994), does not state that any time served has to come before or after sentencing and as law states, an inmate does receive jail credit, but at any rate when Missouri upon their own gave me credit for my sentence since February 9, 1995, the day I was in their jail, and every since, the only concern for Iowa should be their violation of Iowa Code 903A.5(1993). And App. 44-48, clearly reflect Bradley receiving credit on his Missouri sentence, but, the other side of Adams argument would also be self-defeating because if Bradley was not receiving credit on that Missouri sentence, there would be no argument of concurrent.

It is also important to note here that even if Missouri was violating their own laws by allowing credit on Bradley's sentence, that would be an issue for Missouri only and not Iowa and also an argument that would not yet be ripe for this Supreme Court's Jurisdiction and then my sentences would not have a chance of being concurrent, violating the written plea agreement, App. 72, paragraph 13. The point is that Adams argument lacks merit.

Again on App. 21, Adams reasserts that, "Iowa sentences can run concurrent with other sentences if the time is served in this State, (Iowa)."

This absolutely contradicts 903A.5(1993) and Adams gives no authority for such proclamation because none exists.

Then under App. 22, Adams states, "Defendant never raises the question of the recognition by the State of Missouri of the time defendant is serving in Iowa. A new issue can not be raised for the first time on appeal. Any issue or argument not raised in the district court is waived. Defendant has failed to preserve any argument as to the application of the Missouri Statute on concurrent sentences served in other jurisdictions."

First of all, it is impossible to waive issues on an illegal sentence/void judgment, where error preservation, omission, or any other concept of waiver as quoted earlier with caselaw and law and Missouri law has no bearing in any way, shape or form on Iowa courts violating Iowa Code 903A.5 (1993). Missouri's Statutes on concurrent sentences cannot validate a concurrent sentence for Iowa's Statutory mandates and as this attorney, Adams himself stated earlier, Iowa laws are for Iowa.

And Iowa's Statutory mandate of Iowa Code 903A.5 (1993) states that the Iowa court cannot order concurrent sentences where the inmate is receiving credit on a sentence of another jurisdiction and that's what the Iowa court did anyway and violated 903A.5 (1993).

App. 22, where Adams is putting up argument concerning life sentences, is of no avail. Especially where Bradley was led to believe specific aspects

of the life sentences per the plea agreement and illustrated to Bradley by his trial counsel, App. 63-66, and specifically, App. 64, line 25 - App. 65, lines 1-12. And Bradley now has over 31 years in prison on an Iowa sentence that has never started and generally after 30 years a person can file for a pardon but Bradley is barred from doing so, because his sentence has never started. Do see App. 64 + 65.

App. 23, verifies that the aforementioned Brief citations belong to ~~Adams~~ ^{Adams} by way of his signature.

App. 24, is a letter from Adams to Bradley of which Bradley did file a timely response. Here, Adams asserts, "that he did a thorough review of the record in Bradley's case and that he can find no error preserved to allow Bradley to successfully challenge his sentence."

Adams assertions alone are evidence of his lack of knowledge concerning illegal sentences/void judgments, where no error preservation is required.

And I want to bring up a strong point here, Adams was appointed to represent me, but simply reading his brief, one, and I mean anyone, would automatically believe that is a brief for or by a Prosecutor. I saw nothing in that brief that in any way supported representation. That's how all of my attorney's have been from the onset of this case.

App. 25-28, is the 2003, Ruling by Judge Eliza

J. Ovrom on Bradley's Motion to Correct an Illegal Sentence, App. 27, "Bradley is not serving a sentence in another State", is what Judge Ovrom stated. If that is true then she should have deemed my plea agreement, violated for not honoring the concurrent sentences, And App. 44-48, clearly refute that assertion.

Then Judge Ovrom asserts, "Bradley was not in the Missouri Department of Corrections, that Bradley has not served time in prison in Missouri and that Bradley has not received credit upon that State within the meaning of 903A.5(1993), concluding that 903A.5 was not violated in Bradley's case."

Where this Judge is asserting things for the Missouri Department of Corrections, Bradley believes before doing that, she should have at least contacted them first and she would have found that her assertions are and were incorrect. And again, the purpose of the 2000 Amendment of 903A.5, was to bring in the, "in custody" mandate in which to allow credit on the Iowa sentence while receiving credit on the sentence in the other jurisdiction. And it is clear from the App. 44-48, that those Missouri Department of Corrections Face Sheets, were active clearly before Judge Ovrom's Ruling.

App. 28, in this Appendix Judge Ovrom asserts, "Bradley's Iowa life sentence would not be reduced due to credit for any time served in Missouri, even

if Bradley had served time in that jurisdiction, stating, this is an additional reason why 903A.5, does not require Bradley's sentence to be corrected."

It appears here from Judge Ovrom's own words that she is acknowledging that Bradley's sentence needs to be corrected, but she is looking for reasons not to.

And the life sentence aspect has no bearing on whether or not an illegal sentence must be corrected. (See Page 11, this portion, "Reasons For Granting The Petition"). And Bradley stated, if his sentences are not concurrent, we will go to trial. App. 64, line 25 - App. 65, lines 1-12, clearly reflects Bradley's understanding of his concurrent sentences that his trial attorney reassured him was the case if moving forward with the plea.

App. 28, Judge Ovrom falsely asserting that Bradley's sentence must be reduced for time served in order to be eligible for correction. The law states that "when a court departs upward or downward from a legislatively authorized sentence, the pronounced sentence is a nullity subject to correction on appeal or later. Here, is also the relevance of *State v. Hallock*, 765 N.W.2d 598, at 602, section III. Timeliness of Appeal, noting the last paragraph under that section in *Hallock supra*, that clearly demonstrates it was the sentencing provision of Iowa Code 903B.2 that created the departure of the legislatively authorized sentence and not the sentencing Statute of the ~~primary~~ ^{primary} crime.

Likewise, in the case at bar, it was the sentencing

provision of Iowa Code 903A.5 that created the departure of the legislatively authorized sentence and not the Sentencing Statute of the ~~primary~~ ^{primary} crime,

which also raises the question, since Bradley's sentence has legally not started, and therefore the court still having jurisdiction, shouldn't Bradley be allowed to withdraw from his plea as offered by the district court on February 1, 1995, at the guilty plea Hearing?

App. 29 - 35, are from a February 16, 1998, Postconviction Ruling.

App. 30, in the third paragraph this court is asserting that he considered all of the evidence from my case. However, we know this is not true, see App. 61-62 (ORDER, plea negotiations transcribed for first time in September of 2000) and plea negotiations, App. 54-60, in direct contrast with this Ruling, (App. 29-35).

App. 31, Everything under paragraph B, of this App., Note that this PCR court believes because no authority or proposition given waives the issue of my illegal sentence. (See Pg. 11, Reasons For Granting The Petition).

App. 32, 33, 34, all discussing whether or not Bradley asked Thomas to file a Notice of Appeal and the PCR court decided, "Thomas did not file an appeal from Judge Novak's February 10, 1995, sentence be-

cause Bradley never asked him to appeal, App. 33. This conclusion is in direct contrast with the plea negotiations that this court never saw, App. 54-60. And specifically, App. 56, lines 23-25, App. 57, lines 1-2, App. 59, lines 19-20, See also App. 61-62, negotiations transcribed for first time in September of 2000. See also, evidence the court did have, App. 72, paragraph 12, the bracketed area which petitioner clearly believed this was the promise of the preservation of his appeal rights where the State is promising counsel for any and all future proceedings. How could the PCR court not see this from this evidence he did have? Counsel to be provided per 6th Amendment.

And it's also important to note Thomas' presence at the plea negotiations, the day before the plea itself. He knew I was preserving my appeal rights and concurrent sentences.

This next section, App. 85-138, may be a lot of reading, I believe it is all very relevant as it lays out the Facts of this case that Bradley was wanting to take polygraphs for. See App. 86, paragraph 11. And App. 88, lines 2-5, I have always proclaimed my innocence even through this guilty plea.

App. 91 and 94, make declarations by both states, Iowa and Missouri in a co-defendants plea agreement

that they will make known to all defendants of the case, the substance of all statements made by this co-defendant so that the other defendants may have them. The problem is that the State's never made Shaffer's statements known as to either one of his guilty plea Hearings and his — October 19, 1994, deposition was not shown to Bradley until February 3 or 7, 1995, on a jail visit with trial attorney, Thomas at which time Thomas stated it was too late to use because I had already pled guilty and emphasized, it would make a great appeal issue. The one who never filed a Notice of Appeal.

And App. 97-118, are statements made by Shaffer and that are 100% exculpatory for me. And I believe both States violated, I believe it's Brady v. Maryland. I do not have the citation for this, but I do believe this to be a Brady violation.

I do have the following citations:

* Due Process may be violated by the suppression of material, exculpatory and specifically requested evidence, and by prosecutions failure to volunteer exculpatory material which creates a reasonable doubt not otherwise existing.

State v. Cuevas, 282 N.W.2d 74 (1979);

State v. Peterson, 219 N.W.2d 665 (1974);

State v. McClain, 125 N.W.2d 764 (1964);

* Defendant is entitled to exculpatory evidence which the State has, and if such evidence has been suppressed, he is entitled to a new trial.

State v. Johnson, 298 N.W.2d 293 (1980);

* The State may not suppress exculpatory evidence, and if it does so defendant is entitled to appropriate relief, including in some cases a new trial.

State v. Van Rees, 246 N.W.2d 339 (1976);

* State may not suppress exculpatory information; to do so is reversible error.

State v. Hall, 235 N.W.2d 702 (1975);

State v. Houston, 209 N.W.2d 42 (1973).

App. 119-138, are written facts of this case that I am willing to take a polygraph to prove and will do so with an examiner this U.S. Supreme Court trusts the integrity of.

App. 139-146, are documents of co-defendant Angel Stewart, who is likewise under an illegal sentence under the exact same arguments as mine. Though I do not have copies of Stewart's Face Sheets from the Missouri Department of Corrections, I have had them read to me and they do reflect the exact

same language as to her receiving credit upon her Missouri sentence, violating the Iowa court's authority or jurisdiction to order concurrent sentences. I provide this information because I would like her to be joined as a petitioner and she has granted me ~~permission~~ permission to help her fight her case. I just don't know if I have the authority to do so, even though it appears that a Supreme Court of the United States Rule does allow it. If this is true, I would ask this U.S. Supreme Court to invoke its powers to do so.

App. 147-152, is just to show you how unfair I was treated in Missouri. My attorney had no death penalty experience and didn't even file for Discovery until 12 days after I was sentenced to life in prison and other than what he received in App. 148, the only other Discovery done was a phone call to my Iowa attorney on February 9, 1995, the same day I was sentenced in Missouri.

App. 147, is how I received App. 151-152.

App. 148, is the only Discovery evidence my Missouri attorney received.

App. 149-150, shows the date of sentencing.

App. 151-152, reflects the Discovery that should have been filed the same day he was appointed to my case, February 2, 1995.

App. 153-171, clearly shows an illegal arrest where they seek to search the residence I'm living at before an arrest, before trying to contact me, proving there was no probable cause to believe I was unavailable for service of subpoena and after arrest a Magistrate was available and although they arrested me under Iowa Code Chapter 804, they never bothered to comply with 804.23.

On June 27, 1994, there was a search warrant application with affidavits and Material Witness Complaints and warrants filed (Sealed by Court). And there was no identified felony under 804.11. **CONCLUSION** Police interrogation after arrest proves there was no identified felony.

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Steven Dale Bradley

Date: _____