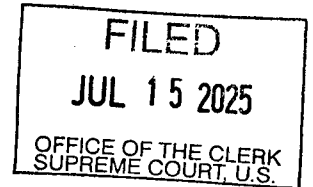


25-6229
No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

Douglas Krusley — PETITIONER
(Your Name)

ORIGINAL



vs.
U.S. DISTRICT COURT, LONDON, KY.
U.S. 6th ~~CIRCUIT COURT, CINCINNATI, OH~~ RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

U.S 6th CIRCUIT COURT OF APPEALS

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

PETITION FOR WRIT OF CERTIORARI

DOUGLAS KRUSLEY

(Your Name)

NORTHPOINT TRAINING CENTER P.O. BOX 479

(Address)

BURGIN, KENTUCKY. 40310

(City, State, Zip Code)

(Phone Number)

QUESTION(S) PRESENTED

PETITION FOR EQUITABLE TOLLING, DUE TO INABILITY
TO ACCESS LIBRARY AND RESOURCES AND ON THE MERITS OF
PETITIONER KRUSLEY'S CASE AT BAR?

THE QUESTION HERE IS THIS?

WHETHER PETITIONER QUALIFIES FOR EQUITABLE TOLLING
DUE TO INABILITY TO ACCESS THE LIBRARY AND OTHER
RESOURCES AND ON THE MERITS OF BEING ACTUALLY INNOCENT?

WHETHER THE PETITIONER DOUGLAS KRUSLEY IS LEGALLY
LIABLE FOR THE EQUITABLE TOLLING, BECAUSE UNDER THE
BRADY VIOLATION, PETITIONER IS NOT LIABLE?

WHETHER PETITIONER'S CLAIM OF ACTUAL INNOCENCE
IS ENOUGH EVIDENCE TO TOLL THE STATUTE OF LIMITATIONS?

WHETHER THE PETITIONER, DOUGLAS KRUSLEY IS ELIGIBLE FOR EQUITABLE TOLLING, DUE TO THE GROUNDS OF INABILITY TO ACCESS THE LIBRARY AND OTHER RESOURCES AND ON THE MERITS OF BEING ACTUALLY INNOCENT?

PETITIONER DOUGLAS KRUSLEY ARGUES THAT HE IS ENTITLED TO EQUITABLE TOLLING, DUE TO LOCK-DOWNS AND LACK OF ACCESS TO THE LAW LIBRARY.

PETITIONER ALLEGES THAT INSTITUTIONAL LOCKDOWNS GENERALLY DON'T HAPPEN, BUT WHEN THEY DO, THIS WOULD REQUIRE EXTRAORDINARY CIRCUMSTANCES THAT WARRANT THE GRANTING OF EQUITABLE TOLLING.

PETITIONER CONTENDS THAT PRISON AUTHORITIES MADE IT IMPOSSIBLE FOR HIM TO FILE DOUGLAS KRUSLEY'S WRIT OF FEDERAL HABEAS CORPUS PETITION BY THE DEADLINE, BECAUSE DOUGLAS KRUSLEY'S ALLEGATIONS WARRANT FURTHER DEVELOPMENT OF THE RECORD, THEREFORE, PETITIONER WOULD HUMBLY ASK THIS GREAT AND HONORABLE UNITED STATES SUPREME COURT, TO REMAND BACK TO THE COURT, FOR FURTHER PROCEEDINGS.

SEE LOTT V. MUELLER, 304 F. 3d 918, (9th Cir. 2002). PETITIONER'S REMANDING FOR FURTHER PROCEEDINGS WHERE DOUGLAS KRUSLEY'S

ALLEGATIONS, REQUIRE AN APPLICATION OF THE RECORD FOR EQUITABLE TOLLING.

THE PETITIONER PLAINLY CLAIMS THAT "HE" DOUGLAS KRUSLEY "HIMSELF" WROTE THE COURTS ASKING FOR HIS CASE FILE, BUT TO FIND OUT THAT IT WAS MISSING PAGES AFTER IT FINALLY ARRIVED, AT THE NORTHPOINT TRAINING CENTER, P.O. BOX 479 BURGINS, KENTUCKY. SO, I DOUGLAS KRUSLEY HAD TO THROW THE WRIT FOR FEDERAL HABEAS CORPUS, TOGETHER VERY QUICKLY.

IF THE EVIDENCE SUPPORTS PETITIONER DOUGLAS KRUSLEY'S ALLEGATIONS

THAT PRISON CONDITIONS MADE FILING THE PETITION TIMELY, THEN

DOUGLAS KRUSLEY'S ALLEGATIONS UNDERMINES PETITIONER DOUGLAS KRUSLEY'S

CLAIM THAT PRISON CONDITIONS MADE A TIMELY FILING BY A PRO-SE PRISONER

LITERALLY IMPOSSIBLE (CITING RAND V. ROWLAND, 154 F. 3d 952, 958 (9th Cir. 1998)).

WE HAVE PREVIOUSLY SAID, THE "IMPOSSIBILITY" REQUIREMENTS SHOULD NOT BE STRICTLY IMPOSED, BECAUSE IMPOSING EXTRAORDINARILY HIGH EVIDENTIARY STANDARDS ON PRO-SE PRISONER LITIGANTS WHO HAVE ALREADY FACED AN UNUSUAL OBSTACLE BEYOND THEIR CONTROL DURING THE AEDPA LIMITATION PERIOD-RUNS AGAINST THE GRAIN OF OUR PRECEDENT.

PETITIONER DOUGLAS KRUSLEY ALREADY FACED A-LOT OF PROBLEMS CONCERNING HIS HEALTH, FAMILY AND PRISON LIFE IN GENERAL, THIS EXTRAORDINARY CIRCUMSTANCES ARE SOME-WHAT TOO MUCH FOR ANY-ONE WITH MEANINGFUL PROBLEMS.

THEREFORE, THE PETITIONER, DOUGLAS KRUSLEY CLAIMS THAT TO ENSURE THAT A PRISONER'S ACCESS TO THE COURTS IS ADEQUATE, EFFECTIVE AND MEANINGFUL, (QUOTING BOUNDS V. SMITH, 430 U.S. 817, 822, 97 S. Ct. 1491, 52 L. Ed. 2d 72 (1977)). ALSO IN HOLLAND, 130 S. Ct. AT 2563. OFTEN THE EXERCISE OF A COURT'S EQUITY POWERS.... MUST BE MADE ON A CASE-BY-CASE BASIS.

PETITIONER DOUGLAS KRUSLEY GOES ONE STEP FURTHER BY ATTEMPTING TO PURSUE HIS CLAIMS ABSENT LIBRARY ACCESS. SEE UNITED STATES V. OAKES, 445 F.3d 88, 94 (10th Cir. 2011). (UNPUBLISHED). (FIRST QUOTING) LEWIS V. CASEY, 518 U.S. 343, 351 (1996). AN INABILITY TO ACCESS LEGAL MATERIALS CAN ALSO MERIT EQUITABLE TOLLING. THE CIRCUMSTANCES IN PETITIONER'S DOUGLAS KRUSLEY CASE AT BAR, IS A NEED FOR "BOTH" EXTRAORDINARY AND BEYOND THE LITIGANT'S CONTROL. AS IN, MENOMINEE INDIAN TRIBE V. UNITED STATES, 577 U.S. 250, 257 (2016). EQUITABLE TOLLING IS APPROPRIATE IN RARE AND EXCEPTIONAL CIRCUMSTANCES SUCH AS PETITIONER DOUGLAS KRUSLEY'S CASE AT HAND BECAUSE THE KENTUCKY PRISONER DOUGLAS KRUSLEY IS ACTUALLY INNOCENT OF THE CHARGED OFFENSE. THE PETITIONER

THE PETITIONER, DOUGLAS KRUSLEY SHOW'S AND PROVES THE STEPS THAT HE TOOK TO DILIGENTLY PURSUE HIS FEDERAL CLAIMS.

WHILE THOSE CIRCUMSTANCES EXISTED. THE PRISONER, DOUGLAS KRUSLEY MADE THE EFFORT TO RESEARCH HIS CLAIMS THOROUGHLY AND SET FORTH HIS ARGUMENTS IN AS COMPELLING MANNER AS POSSIBLE.

PETITIONER DOUGLAS KRUSLEY'S WHOLE ARGUMENT IS HE ORDERED LEGAL MATERIALS, TO THE PRISON TO HELP AID HIM IN HIS DEFENSE, BUT HE NEVER RECEIVED THEM AT ALL. THIS IS A VERY COMPELLING AN UNUSUAL CIRCUMSTANCES THAT REQUIRES EXTRAORDINARY REASON'S FOR EQUITABLE TOLLING. THAT IS WHY THE PETITIONER, DOUGLAS KRUSLEY REQUIRES THAT COURTS MUST BE AWARE OF THE FACT THAT SPECIFIC CIRCUMSTANCES, OFTEN HARD TO PREDICT IN ADVANCE, COULD WARRANT SPECIAL TREATMENT IN AN APPROPRIATE CASE.

THEREFORE, THE PETITIONER, DOUGLAS KRUSLEY HUMBLY REQUEST THAT THE BEST SUPREME COURT OF THE UNITED STATES OF AMERICA TAKE APPROPRIATE DEVELOPMENT OF HIS WHOLE RECORD.

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

LOTT V. MUELLER, 304 F.3d 918, (9th Cir.2002).

RAND V. ROWLAND, 154 F. 3d 952, 958 (9th Cir.1998).

BOUNDS V. SMITH, 430 U.S. 817, 822, 97 S. Ct. 1491, 52 L. Ed. 2d 72 (1977).

HOLLAND, 130 S.Ct. AT 2563.

UNITED STATES V. OAKES, 445 FED. APPX. 88, 94 (10 Cir. 2011).

LEWIS V. CASEY, 518 U.S. 343, 351 (1996).

INDIAN TRIBE V. UNITED STATES, 577 U.S. 250, 257 (2016).

TABLE OF CONTENTS

OPINIONS BELOW.....	1
JURISDICTION.....	
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED	
STATEMENT OF THE CASE	
REASONS FOR GRANTING THE WRIT	
CONCLUSION.....	

INDEX TO APPENDICES

APPENDIX A	United States Court of Appeals.
APPENDIX B	United States District Court.
APPENDIX C	D-Review Supreme Court of Kentucky.
APPENDIX D	
APPENDIX E	
APPENDIX F	

TABLE OF AUTHORITIES CITED

CASES

PAGE NUMBER

LOTT V. MUELLER, 304 F. 3d 918, (9th Cir. 2002).

RAND V. ROWLAND, 154 F. 3d 952, 958 (9th Cir. 1998).

ROUNDS V. SMITH, 430 U.S. 817, 822, 97 S. Ct. 1491, 52 L. Ed. 2d 72 (1977).

HOLLAND, 130 S. Ct. AT 2563.

UNITED STATES V. OAKES, 445 FED. APPX. 88, 94 (10 Cir. 2011).

LEWIS V. CASEY, 518 U.S. 343, 351 (1996).

INDIAN TRIBE V. UNITED STATES, 577 U.S. 250, 257 (2016).

STATUTES AND RULES

KRE ~~2412~~, - KRE 2 412,

KRE 412 (b) (1) (c) (a), AND KRE 412 (b)(1) (c),

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.

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

☐ reported at 2-5-2025; 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 C to the petition and is

☐ reported at 3-29-2023; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

(D-Review) Case NO: 2022-5C-452
The opinion of the Supreme Court of Ky 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 6-24-2025.

☐ 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

THE WHOLE CASE FALLS UNDER THE UNITED STATES CONSTITUTION AND THAT WOULD BE THE 5th, 6th, AND 14th AMENDMENTS AND THE KENTUCKY CONSTITUTION 2nd, 3rd AND 14th AMENDMENTS.

PETITIONER DOUGLAS KRUSLEY STATES THAT HIS CONSTITUTION RIGHTS WERE VIOLATED ALL THE WAY THROUGH HIS ENTIRE UNITED STATES CONSTITUTION. THE DUE PROCESS CLAUSE OF THE 14th AMENDMENT WAS VIOLATED AND REQUIRES A NEW TRIAL OR ATLEAST A EVIDENTIARY HEARING ON THE GROUNDS OF HIS ENTIRE CASE BEING UNCONSTITUTIONAL.

PETITIONER'S STATUTORY PROVISIONS INVOLVED WOULD BE HIS EQUAL RIGHTS UNDER THE FOURTEENTH AMENDMENTS.

STATEMENT OF THE CASE

Petitioner, Douglas Krusley, diligently pursued to get his 2254 Federal Habeas Corpus in on time. Because Mr. Douglas Krusley is Claiming Actually Innocent of the Charge And Conviction And Actually Innocent of the Sentence. There Were Set back's out of petitioner's Control Four different times administration locked Down the Compound due to Four Correctional Officers Being beat Up "needlessly" two had to be hospitalized Each time locked down for (2) months, no access to Law library, nor Law books, nor law computer's which Contain's Lexis - Nexis (Case law's) prentice's added. Inmate's were escorted to chow and back locked down. Douglas Krusley Claims he doesn't have free rein as on The streets to get things done; Here your freedom is Set By strict rule's, Set by administration, when you can Go here, for how long (1) one hour, week end's law library, And general law library are closed. Some day's law library Doesn't open. "No Exceptions" asked legal aid's for help but Petitioner didn't have six hundred dollars. So struggled on his Own from a brain injury in 97. aneurism developed from Being run over by drunk driver on my bike in 76, surgery was Done in Champaign / Urbana, IL. Dr. helrich as a result the Petitioner Douglas Krusley is slow at Comprehending learning New things, understanding what he reads;

All Mr. Krusley medical Information at medical dept

At NorthPoint Training Center Prison Where petitioner is being Illegally against his will, a legal aid helped Petitioner with his Federal Habeus Corpus John Mann D-4 the second strain of covid hit worse than the first strain at N.T.C. Govenor Steve Beshear declared a National Emergency for State of Kentucky. Which was Out of petitioner Control due to extraordinary Circumstances, N.T.C. went on administration lock down, Covid tests were done and petitioner Douglas Krusley tested positive Petitioner was Quarantined in dorm five upper left bunk Twenty nine, for four months and twenty one days petitioner Didn't Stop working on his Federal Habeus Corpus while In quarantine wrote it out on additional paper what the Petitioner lacked after locked down in quarantine was access To the law library Computers (Lexis Nexis) ~~parentthesis~~ added. And Law books for case laws. Once Quarantine was lifted the Petitioner diligently pursude to get case laws to beat dead-line, but dead line past a result of quarantined. Petitioner Did Send in a discretionary review to Supreme Court of Kentucky, Exhibits enclosed. Petitioner Douglas Krusley Wrote Abigail Cudill, Warden, Information on adminisitive Lock down fowarded to Frankfort, KY. D.D.C. they denied Petitioner's request Exhibits enclosed. All petitioner has Done was fight this false Conviction from day one to prove That Douglas Krusley is actually Innocent of the Charge And Conviction And Actually Innocent of the Sentence...!

REASONS FOR GRANTING THE PETITION

THE PETITIONER, DOUGLAS KRUSLEY HUMBLY MOVES THE
GREATEST SUPREME COURT OF THE UNITED STATES OF AMERICA
TO GRANT HIS REQUEST ON THE MERITS OF HIS CASE AT HAND AND
BECAUSE THIS WHOLE CASE IS INVIOLATION TO PETITIONERS
UNITED STATES CONSTITUTIONAL RIGHTS.

THE UNITED STATES SUPREME COURT OF AMERICA HAS A RIGHT
TO REVERSE A WRONG DECISION MADE BY THE LOWER COURT.

PETITIONER ONLY PRAY'S THAT DOUGLAS KRUSLEY GET'S THE
CHANCE THAT HE DESERVES TO HAVE ON HIS EQUITABLE TOLLING
DUE TO THE PRISON LOCKDOWN AND HAVING TROUBLE GETTING
THE COURT TO SEND ALL THE INFORMATION THAT HE WOULD
NEED TO FILE HIS FEDERAL HABEAS CORPUS IN A TIMELY MANNER.

ARGUMENT

WHETHER, PETITIONER'S "NO FORCEIBLE COMPULSION" IS ENOUGH EVIDENCE TO PROVE HIS CLAIM OF ACTUALLY INNOCENT OF THE CRIME AND ACTUALLY INNOCENT OF THE SENTENCE.

Petitioner Douglas Krusley argues that his proof of actually innocent of the crime charged and actually innocent of the sentence, is that Krusley now brings to the attention of this Honorable Supreme Court as evidence to as in: PEOPLE V. MINGO, 12 N.Y. 3d. 563, 573 (2009). Where as hear say on anyone that say's "Forceible Compulsion" used on them and can - not prove it, is hearsay and should not be admitted into evidence against the defendant. Take a good look over two different letters that is actual proof of innocence.

All of the exhibits can be found in petitioner's Federal Habeas Corpus, that was filed in the United State District Court.

Therefore, NOTICE OF KRE 412 EVIDENCE, AND SUPPLEMENTAL OF "A Real Innocent Man," who has been attacking this false conviction in the case at hand, at every angle possible to seek out "REAL JUSTICE?" Because this case is an "EGREGIOUS" case of The Criminal Justice System, Gone Wrong, and it is up to this Honorable Supreme Court, to make all wrong's right, and this can be done by an honest, reasonable, fair up standing Judge's when he or she reads the truth before them, "THE EVIDENCE SPEAKS FOR ITSELF".

ARGUMENT

WHETHER, "SARA BELLAMY'S STATEMENT ADMITTED INTO THE HEARSAY RULE, TO PETITIONER CASE AT BAR, WAS UNFAIRLY PREJUDICIAL HEARSAY EVIDENCE?"

Petitioner Douglas Krusley Completely argues that Sara Bellamy's statement is Completely hearsay and there is "NO - PHYSICAL" EVIDENCE OF "ANY-KIND" that Petitioner committed the crime, Infact all The evidence In the case at hand, proves that petitioner never Committed the crime, SEE attached statements., AS IN, CRAWFORD V. WASHINGTON, 541 U.S. 36, 68 124 S.Ct. 1354, 158 L. Ed. 2d 177 (2004.).

Let's view the facts of this case and situation at Bar.

Evidence of alleged victim and witness prior Criminal History, "especially" "a history of reporting violence" Represents strong evidence with which to Impeach the witness.

Witness Sara Bellamy situation in petitioner Douglas Krusley Case, is relevant to the prior situation That Sara Bellamy had, because the situation in Sara Bellamy prior criminal history has to be Impeachment Evidence on the grounds of general credibility. SEE; DAVIS V. ALASKA, 415 U.S. 308, 316 (1974)., holding: One way of discrediting the witness is to introduce Evidence of a prior history of a witness. Evidence Of a "witness" prior history is a general attack on The credibility of the witness.

Therefore, Evidence of Sara Bellamy prior history is Solid evidence for attacking the credibility of the Witness, See: LOVETT V. FOLTZ, 687 F. Supp. 1126 (6th Cir.); BEASLEY V. UNITED STATES, 491 F. 2d 687 at 696 (6th Cir. 1974).

SUPPLEMENTAL NOTICE OF KRE 412 EVIDENCE

Petitioner Douglas Krusley is actually innocent of the Charge and actually innocent of the sentence, in the same way that someone taking a stroll in the park is actually innocent of the crime of walking on a side walk. "NO" such crime exists. Petitioner states that the witness, Sara Bellamy plainly states that the Defendant Douglas Krusley Did-Not have sexual intercourse with her AND the statement attached is actual evidence that proves that.

1). Next, that the complaining witness, Sara Bellamy, had sexual intercourse on or about the day prior to the alleged incident with an individual who was not the Defendant, Douglas Krusley.

2). This evidence would be offered to show that any alleged bruising was caused from a person other than the Defendant, Douglas Krusley, asserted the evidence was admissible under an exception to KRE 412, the so-called "RAPE SHIELD LAW." The evidence falls into two of the three exceptions. KRE 412(b)(1)(A), allows evidence of specific sexual acts of an alleged victim to be admitted to prove a third person "was the source of semen, injury, or other physical evidence." Also, KRE 412(b)(1)(C), allows the introduction of "any other evidence directly pertinent to the offense charged." Such as Sara Bellamy's Boy-Friend love letter, the four men and the sixteen year old boy the alleged victim had sexual intercourse with... The Pulaski County Circuit Court showed prejudice toward the defendant and violating Douglas Krusley's Due Process Right's to a fair trial by suppressing "Key-Evidence" from petitioner trial. Douglas Krusley asserts "IF" this evidence was presented to the jury at the petitioner trial the outcome would have been Not-Guilty...

Wherefore, The Petitioner, Douglas Krusley Humbly Moves This Great and Honorable Supreme Court to Grant the

Petitioner a evidentiary hearing concerning this whole Due Process Violation of Law, of The United States Consitution, and The Kentucky Constitution because, This New-Evidence that "I" "myself" received at Least Three plus years later from the trial, I was Put though and found guilty of and being actually Innocent of the Crime Charged, and actually Innocent Of the Sentence. Defendant, and with the trial ended With a Wrongful Conviction on "A" Actually Innocent Man, of the Crime Charged, and actually Innocent of The Sentence. Which requies Extraordinary Circumstances In Justifying relief.

The petitioner claims that he is actually Innocent When Douglas Krusley "did-Not"; Infact, Commit The charged offense or any other offenses. SEE: STATE V. WILSON, 324 S.W. 3d 595, 598 (crim. App. 2010).

ARGUMENT

Whether, Petitioner "Douglas Krusley" Is Actually Innocent Of The Crime, Which Petitioner Was Sentenced.

Petitioner Krusley argues that he is actually innocent of the charged offence, and this is an egregious case of the Criminal Justice System gone wrong. AS IN, SCHLUP V. DELO, 513 U.S. 298, 315, 115 S.Ct. 851, 130 L. Ed. 2d 808 (1995). Where the Court found actual innocence, on the "MERITS". Where as here, petitioner Douglas Krusley states that the statements are A True Fact.

NOTICE OF KRE 412 EVIDENCE

Clearly States The Following:

- 1). That the Complaining witness, Sara Bellamy, has indicated that she has had Sexual Intercourse on at least two other occasions and with two different individuals neither of whom are the defendant Douglas Krusley.
- 2). This evidence would be offered to show that the Complaining witness has Independent Knowledge of Sexual acts. If the Complaining witness claims Ignorance than this evidence would be used to Impeach the Complaining witness.

A EVIDENTIARY HEARING IS REQUIRED.

The petitioner Douglas Krusley Ask's This Honorable Supreme Court TO: consider the whole Writ Of Certiorari, on It's Face value of Merits, Because The Plain Facts Speak For Themselves.

Therefore, Petitioner Douglas Krusley Should Be Released From North Point Trg Ctr. From This False Conviction Any Trial Judge Can Plainly See The Fact's From Fiction.

ARGUMENT

WHETHER, OR NOT, THE ALLEGED "VICTIM" SARA BELLAMY
FALSLEY TESTIFIED "UNDER OATH," AGAINST THE
PETITIONER, DOUGLAS KRUSLEY, BECAUSE, SARA BELLAMY
GAVE FOUR, DIFFERANT STATEMENTS TO THE COURT, THAT
DON'T MATCH UP, DUE TO BEING COACHED BY ERIKA
ERIKERSON MAYBEN WHO ALSO FALSELY TESTIFIED
"UNDER OATH" WHERE SARA BELLAMY RESIDES IN
HER HOME; P.C.S.O. DET. BLAND, ROBERT GLEN WHO
USED COERCION ON SARA BELLAMY, STATEMENT NONE,
TRUE, ONLY FICTIONAL, STORIE'S; SARA BELLAMY TOLD
FOR ATTENTION, THEY DON'T MATCH-UP, TO WHAT
ACTUALLY HAPPENED WITH SARA BELLAMY AND THE
FOUR MEN AND A SIXTEEN YEAR OLD BOY WHO SARA
BELLAMY HAD SEXUAL INTERCOURSE WITH ON
THESE DATE'S 11-26-11, 11-27-11, 11-28-11...?

Petitioner, Douglas Krusley, States and Argues, the
Following Facts, which proves his Innocence. AS IN,
CRAWFORD V. WASHINGTON, LOVETT V. FOLTZ, And
BEASLEY V. UNITED STATES, SEE: DAVIS V. ALASKA:

First the alleged victim, Sara Bellamy stated in the
Pulaski County Circuit Court Room "under oath" that
She had sexual Intercourse with four men and a
Sixteen year old boy. Sara Bellamy friend Rebecca
Taylor stated on Record, alleged victim Sara Bellamy was
Caught-Up having sexual Intercourse with a man,
In the back room where they work. If still the Court
Is-Not Convinced, let's go deeper and futher into the
Lie's the alleged victim Sara Bellamy told about the
Petitioner Douglas Krusley, at the Pulaski County
Circuit Court in Somerset, Kentucky. The prosecutor
(Jeremy Bartley) asked the alleged victim Sara Bellamy
Did MR. Krusley use a condom on you? The alleged
Victim said, "NO" HE "DID-NOT." Mr. Krusley Ejaculated
In me for 20 to 30 minutes? Petitioner argues Rape Kit
Was done on alleged victim Sara Bellamy and the

Result's Were "negative" NO-SEAMEN, NO-SPERM, NO-Pubic Hair Of Petitioner; Mr. Krusley; Could not be found In alleged victim, Sara Bellamy; Nothing, "No" DNA of Mr. Krusley was not found on briefs either, period...
"Key Evidence" Suppressed from petitioner Trial.

Violating petitioner's Due Process rights to a fair trial...

Big Question is, "Why Is The Alleged Victim Sara Bellamy Protecting These Four Men She Had Sexual Intercourse With...?"

IF this evidence had been brought-up would have Impeached The victim's statement from the beginning of the case. AS IN; STATE V. XIE, 62 OHIO ST. 3d 521, 524 N.E. 2d 715 (1992). SEE: GILIO V. UNITED STATES, 405 U.S. 150, 153, 92 S. Ct. 763, 31 L. Ed. 2d 104 (1972). (Quoting) MOONEY V. HOLAHAN, 294 U.S. 103, 112, 55 S. Ct. 340 79 L. Ed 791 (1935). BEARDEN V. BAUMAN, 2024 U.S. DIST.

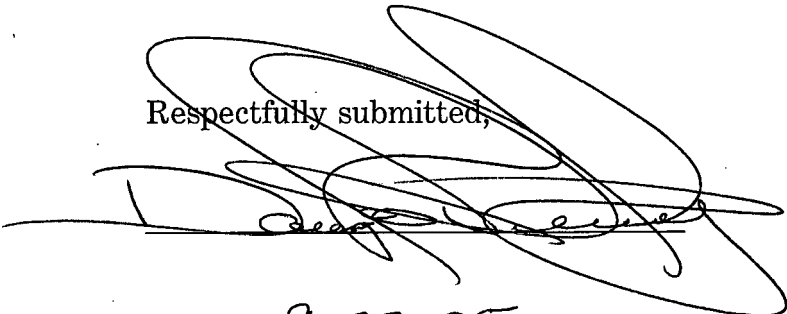
Petitioner, Douglas Krusley argues also that "He" "Himself" has Been wrongfully accused by the victim's statement from the Start of petitioners case at bar, the victim Sara Bellamy Fraudulently and wrongfully accused the petitioner Douglas Krusley And because Sara Bellamy willing and Intentionally Committed Fraud against the petitioner This Great And Honorable Supreme Court has a duty to make all wrong doings right, that the Victim Sara Bellamy put against the petitioner Douglas Krusley and this Court must take all positive notes taken and contained in Petitioner's writ of Certiorari of face value as sufficient factual Matter, accepted as true claim for relief that is plausible on it's Face. SEE: ASHCROFT V. IQBAL, 556 U.S. 662, 678, 129 S. Ct. 1937, 173 L. Ed. 2d 868 (2009). (Quoting) TWOMBLY, 550 U.S. at 570). The petitioner has a solid claim of wrongfully accused by the Victim Sara Bellamy that petitioner Douglas Krusley has in Fact presented to This Great And Honorable Supreme Court and Petitioner only ask's This Great And Honorable Supreme Court For relief from the false Conviction, that he is left faced With on a daily basis and it is totally upon this Courts Judgement to make all wrong doings right. AS IN, This State Law. AS IN: JONES V. DUNCAN, 840 F. 2d 359, (6th Cir. 1988).

CONCLUSION

I THE PETITIONER, DOUGLAS KRUSLEY HUMBLY ASK FOR THIS
WRIT OF CERTIORARI. TO BE GRANTED ON THE MERITS OF THE CASE.

The petition for a writ of certiorari should be granted.

Respectfully submitted,


Date: 9-23-25