

25-6782
No. _____

ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES

Supreme Court, U.S.
FILED

JAN 08 2026

OFFICE OF THE CLERK

Cosea Bell ^{D.O.C. #318282} PETITIONER
(Your Name)

VS.

State of Louisiana — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

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

PETITION FOR WRIT OF CERTIORARI

Cosea Bell ^{D.O.C. #318282}
(Your Name)
Allen Correctional Center
3751 Lauderdale Woodyard Road
(Address)

Kinder, LA. 70648
(City, State, Zip Code)

(Phone Number)

QUESTION(S) PRESENTED

- Can this U.S. Supreme Court Justice have petitioner, Cosea Bell criminal conviction case reviewed and reverse/overturn his convictions due to the harm errors that was in the trial proceedings? Due to the unavailable exculpatory evidence that the state/ District Attorney can not provide for a second/retry trial on this criminal conviction case, and ineffective assistance of counsel with conflict of interest, and perjured testimony by the accuser/ state witness which caused a unfairly prejudicial testimony evidence, ethic. — A NON UNANIMOUS JURY VERDICT
- Do petitioner Cosea Bell have time to file a timely Federal Habeas Corpus-2254 Form Application for collateral review to the state Federal District Court for his U.S. Constitution rights violations claims on his criminal convictions case? < if needed ?

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

Brady v. Maryland / Jackson v. Virginia, 61 L. Ed. 2d 560 (1979)
Parratt v. Taylor, 451 U.S. 527 (1981)
United States v. Jernigan, 492 F.3d 1050, 1053
United States v. Brooks
Chiason v. Zapata Gulf Marine Corp.
United States v. Blackley, 986 F. Supp. 600, 603 (1997)
California v. Trombetta, 81 L. Ed. 2d 413
United States v. Valenzuela, 73 L. Ed. 2d 1193
United States v. Alfred, 982 F.3d 1273
Bullington, 451 U.S. 442
Burks v. United States, 437 U.S. 1
State v. Walker, 681 So. 2d 1023
State v. Dunn, 709 So. 2d 852
Stockton v. Ford, 52 U.S. 232 (1850)
Walker v. State, Dept. of Transp. and Development, 817 So. 2d 57 (2002)
State v. Clausen, 104 So. 3d 410 (2012)
State v. Craddock, 62 So. 3d 791 (1st Cir. 2011)
Hodges v. Reasonover, 103 So. 3d 1069
United States v. Barham, 595 F.2d 231 / Smith v. Reincke, 354 F.2d 418
Robbins v. Small, 371 F.2d 793 / Hammond v. U.S., 309 F.2d 935
Strickland v. Washington
Ramos v. Louisiana, 706 L. Ed. 2d 583 / Edward v. Vannoy, 141 S. Ct. 1547

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

APPENDIX B

APPENDIX C

APPENDIX D

APPENDIX E

APPENDIX F

TABLE OF AUTHORITIES CITED

CASES	PAGE NUMBER
Strickland v. Washington	
127 L. Ed. 2d 731	
Jackson v. Virginia, 61 L. Ed. 2d 560 (1979)	
Strickler v. Greene, 144 L. Ed. 2d 286	
Kyles v. Whitley, 514 U.S. 434, 115 S.Ct. 1555	
102 L. Ed. 2d 1041	
87 L. Ed. 2d 802	
United States v. Agurs, 427 U.S. 97	
49 L. Ed. 2d 342	
Bagley, 473 U.S. 676-105 S.Ct. 3375	
State v. Pierre, 125 So. 3d 403	
Murrow v. Dretke, 367 F. 3d 309, 316	
Murray, 91 L. Ed. 2d 397	
Moore v. Illinois, 33 L. Ed. 2d 706	
Apodaca v. Oregon / Teague v. Lane	
State v. Bertrand, 6 So. 3d 738 / State v. Curtis, 112 So. 3d 323	
STATUTES AND RULES	

La. C. CR. P. Article 930.10
 La. C. CR. P. Article 716 / La. C. CR. P. Article 729.5
 Louisiana code and evidence Article 401 and 403
 Louisiana code and Evidence Article 607 C and 608 B
 La. C. CR. P. Article 782
 Louisiana Constitution Article 1, 13
 Louisiana State Bar Article 16 RPC Rule 1.11 And Rule 1.9

OTHER

citation omitted cases - ineffective assistance of counsel (conflict of interest)
 State v. Craddock, 62 So 3d 791 (1st Cir. 2011)
 Walker v. State, Dept. of Transp. and Development, 817 So. 2d 57 (La. 2003)
 Hodges v. Reason, 103 So. 3d 1069 (La. 2012)

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 C to the petition and is

- ☒ reported at Louisiana Supreme Court; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the Louisiana Supreme Court court appears at Appendix C 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 _____.

☐ 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 10-14-2025.
A copy of that decision appears at Appendix C.

☐ 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

14th amendment - violation of Due process - A right to have
Exculpatory Evidence For impeachment
6th Amendment - violation of Right to a fair trial and
of 4, 5, Constitution Right to Receive Effective Assistance of Counsel
Louisiana Constitution of 1974 Article 1 and 13

STATEMENT OF THE CASE

- the Louisiana State 23rd District Court erred in upholding denial of petition Cosea bell post conviction Relief to grounds of the conviction which was obtained in violation of the constitution of the United States and the State of Louisiana. And the denial of a post conviction plea agreement. This Record demonstrates the absence of a genuine issues of material facts and procedural default of claims.
- Petition Cosea bell is asking this court for Review despite procedural default. The alleged trial errors not only created prejudice but that it worked to petitioner Cosea bell actual and substantial disadvantage infecting his entire trial with errors of constitutional dimensions.
- Petition Cosea bell Filed a timely post conviction Relief application on date, 8-10-2012. The motion was granted by the Louisiana 23rd District Court for alleged claims: Ineffective Assistance of Counsel, unfair Jury, Hearsay inconsistent statements, perjury testimony by accuser, no capacity and credibility of accuser, non unanimous Jury verdict, 11-1 prosecutorial misconduct - no physical evidence - D.A. Prosecution fail to disclose evidence favorable to defendant -
On date, 5-20-2014 a motion was moot with a continue through year 2020. On date, 7-19-2021 a memorandum of Law in support of a post conviction Relief application was filed for ineffective Assistance of Counsel. A motion was granted on date, 9-21-2021. The State - D.A. Responded with a post conviction Relief plea agreement and offer a plea deal pursuant to LA. C. CR. P. Article 930.10 -
On date, 7-29-2024 petitioner Cosea bell filed a second subsequent uniform application for post conviction Relief for the claims that was originally filed on date, 8-10-2012 which was granted and moot. The Louisiana 23rd District Court denied petition Cosea bell second subsequent application for post conviction Relief and post conviction plea agreement on date, 9-17-2024 -
 - The Exhibit Court dates, motions, and order is on criminal minutes Record by the State of Louisiana 23rd District Court, Docket Number 23307 for dates, 12-4-2007 through 9-17-2024 -
 - The State - District Attorney fail to disclose a plea Deal: Petitioner Cosea bell asserts that the state failed to disclose a plea deal it made with petitioner Cosea bell -
The prosecutorial misconduct with no physical evidence, insufficient evidence and perjury testimony evidence claims can not possibly result in a new trial.
 - The District Attorney should proceed under LA. C. CR. P. Article 930.10 -

Pursuant to LA. C. CR. P. Article 930.10 Permits the court to set aside a final conviction without stating a basis in the law, in order to effectuate a post conviction plea agreement for the purpose of amending the defendant-petitioner's conviction. It permits courts to overturn the defendant's final conviction and then accept their guilty plea and impose the agreed to sentence.

- Petition Cosea bell view this more in comparison to the DNA cases and no forensic testing on cell phones where in this case there was at least allegedly some new evidence that was found that could necessary would result in acquittal and could have affected the jury's decision. The district courts ruled that post conviction plea agreement is not unconstitutional. Having ruled in favor of defendant on the issue of constitutionality, the district court's ruling was silent as to the standing and timeliness issues raised by petition Cosea bell, this interest of justice demand further consideration of petition Cosea bell case.

< ARGUMENT >

- Petition Cosea bell bears burden of showing by preponderance of evidence that the District Attorney has had personal interest in conflict with fair and impartial administration of justice, which was on grounds of biased and prejudiced to the extent.
- Petition Cosea bell raised a meritorious actual innocence which present evidence of innocence, and merely argue in a conclusory manner that any some probative value of the testimony evidence would be outweighed by the danger of unfair prejudice.

the prosecution-D.A. violated Brady case claims by concealing the evidence regarding witness-accuser credibility and testimony which petition Cosea bell contends contradicted the prosecution's evidence about when the crime took place. It emerged that the prosecution had wrongfully withheld relevant information that could have advanced petition Cosea bell plea.

this belatedly revealed information would have undermined the prosecution-D.A. and materially aided petition Cosea bell defense at trial. If the state-D.A. does not seek to introduce these evidence at a second trial, it would bear the burden to show inadmissibility

These errors which should be considered in the interest of justice, there is no evidence petition cosea bell acted in accordance with the character act with proving motive, intent, preparation, and plan. There is no physical evidence for rational trier of fact for intent to commit an offense exist and is a constitutional question of fact.

Petition cosea bell bears the burden of showing specific and compelling prejudice that resulted in an unfair trial. The jury trial was based upon historic consideration of unreliability and of potential unfairness to an accused, to permit into evidence damaging out of court statements which cannot be tested as to their basis of facts, and by cross examination of the out of court declarant.

This case involves reversal grounds upon the insufficiency of the fact presented at trial, also reversal occasioned by procedural errors of law that prejudice the petition cosea bell ability to present his case, bring into play an additional element that tips the scales of justice in petition cosea bell favor his innocence as a matter of law when the prosecution has failed to prove its case after a full opportunity at trial. Petition cosea bell raise these claims for the trial testimony constituted a procedural default, which resulted in fundamental unfairness. The fundamental miscarriage of justice exception to the procedural default rule is compass constitutional errors which have deprived petition cosea bell of a basic trial process have resulted in the conviction of petition cosea bell who is actually innocent. The due process of law signifies a right to be heard is such a fundamental error that it has been considered a denial of the basic trial process. Petition cosea bell with no forensic testing of cell phones and DNA test results were favorable to the defense which is a Brady case claim. The prosecutor-D.A. withheld from petition cosea bell DNA comparison results the state-D.A. did not possessed at time of trial which excluded petition cosea bell and the accuser from the cell phones collected from the scene, even though the prosecutor-D.A. provided the defense with crime scene technician's with the state witness report listing the DNA test and cell phones which was the list of evidence seized including accuser home computer.

- The evidence must appear to have been discovered since the trial.
- The evidence must be such as ought to produce an opposite result at a second trial on the merits.

And the new trial will generally be refused when the sole object of the new evidence is to discredit a witness on the opposite side. The falsely testimony evidence against petition cosea bell had appeared so overwhelming that it was highly improbable that the lost cell phones and no test results of the unavailable DNA evidence and no cell phones forensic testing was exculpatory.

Petition cosea bell was prejudiced against by the failure of the state to preserve and test the DNA evidence, cell phones, and accuser home computer. This is a violation of petition cosea bell 14th amendment constitutional rights with deprivations without due process of law. Under citation omitted case; *Parratt v. Taylor*, 451 U.S. 527 (1981) — *Jackson v. Virginia*, 61 L. Ed. 2d 560 (1979)

The state D.A. failed to correct errors in this criminal case. See trier of fact: Under LA. C. CR. P. Article 716 and Article 729.5 and Louisiana Code and evidence Article 401 and 403 and Article 607 C and 608 B —

The state's D.A. suppression of the impeachment evidence prejudice the defense. Under citation omitted case, *United States v. Nigam*, 492 F. 3d 1050, 1053 — Here it is undisputed that the state-D.A. did not itself disclose the evidence despite ample opportunity and a known alternative to seek ex parte direction from the court.

Petition cosea bell argues that because of the lack forensic evidence, the verdict was contrary to law and evidence. The impeachment evidence was offered to discredit the witness-accuser to reduce the effectiveness of witness testimony by bringing forth evidence which explains why the jury should not put faith in witness testimony. Under citation omitted cases: *United States v. Brooks* and *Chilson v. Zapata Gulf Marine Corp.* —

See trier of fact: Discovery and Disclosure under LA. C. CR. P. Art. 716 generally obligates the state-D.A. on defense motion to produce any recorded statements and confession made by the defendant. Petition cosea bell allege that the failure of the state-D.A. to produce his recorded audio tape in discovery violated his rights to a fair trial.

In this event of the state's-D.A. failure to comply with the discovery Rules, it must be determined that petition cosea bell was actually prejudiced by the non disclosure and the trial court abused it's discretion. Petition cosea bell Recorded tape statements should have been provided to the defense and that non disclosure at that time of trial was inadequate.

Petition cosea bell has shown that the DNA evidence is/was sufficient to undermine confidence in the verdict. The purposed DNA testing of the specific evidence will produce material evidence that would support the theory of defense and raise a reasonable probability petition cosea bell did not commit the offenses. Petition cosea bell had certified that he provided DNA sample for purpose of comparison. This was substantially contributed to the delay and no results for DNA test report by laboratory and the District Attorney. The evidence to be tested is - was DNA evidence on my behalf. The denial and neglect in DNA Results, resulted in a manifest injustice and upon good cause shown. Petition cosea bell was prejudice by the failure of the state-D.A. to preserve and test the DNA evidence. Under citation omitted case: United states v. Blackley, 986 F. Supp. 600, 603 - Refusing to compel disclosure under Brady v. Maryland case of materials concerning decision to prosecute. Suppression by the prosecutor of evidence violates due process where the evidence is material either to guilt or to punishment irrespective of the good faith or bad faith of the prosecution.

The constitutional obligations regarding Disclosure are:

The evidence at issue is favorable to the petition cosea bell, because it is exculpatory evidence and it is impeaching.

The evidence must be suppressed by the state-D.A. willfully and inadvertently. In the event of the state's-D.A. failure to comply with the discovery Rules, prejudice had ensued by the non disclosures, the trial court abused it's discretion. This basic unfairness results which constitutes reversible error. This is a reasonable probability that the suppressed evidence would have produced a different result. Petition cosea bell satisfied this standard by showing that the favorable evidence could have reasonably been taken to put the whole case in such a different light as to undermine confidence in the verdict.

the state's -D.A. warrant to obtain petition cosea bell DNA evidence and cell phones forensic testing violated his 14th amendment rights because affidavits supporting the warrant omitted information material to probable cause determination.

• If the state -D.A. does not seek to introduce these evidence at a new trial it would bear the burden to show inadmissibility. The lack of evidentiary corroborations is inconsistent with undisputed evidence in the trial record and is directly contradicted by state witness and expert testimony. Scientific evidence revealed that no encounter was involved. Petition cosea bell support his claims with reliable evidence that was not presented at trial, no forensic testing of DNA results and cell phones. Petition cosea bell have shown that it is more likely than not that no reasonable juror would have convicted him in light of the forensic testing results evidence.

• This U.S. Supreme Court held that state's -D.A. failure to disclose material evidence casting doubt on credibility of state witness violates defendant's due process rights.

• The D.A. prosecution actions prejudice the progression of petition cosea bell state of claims in this trial error case.

• The due process clause under the 14th amendment requires the state D.A. to disclose to criminal defendants favorable evidence that is material either to guilt or to punishment. Criminal prosecutions must comport with prevailing notions of fundamental fairness.

We have long interpreted this standard of fairness to require that defendants be afforded a meaningful opportunity to present a complete defense. Under citation omitted cases; California v. Trombetta, 81 L. Ed. 2d 413 And United States v. Valenzuela, 73 L. Ed. 2d 1193 —

taken together this group of constitutional privileges delivers exculpatory evidence into the hands of the accused thereby protecting the innocent from erroneous conviction and ensuring the integrity of our criminal justice system. Petition cosea bell concede there is evidence in the trial transcript record to prove an actual loss of and neglect evidence that would have aided petition cosea bell and his defense trial counsel in the criminal proceeding. Forensic evidence would have shown that the crime never occurred.

The evidence was insufficient and circumstantial because state-D.A. failed to introduce physical findings, the testimony evidence was unfairly prejudicial it was so inflammatory on its face as to divert jury's attention from material issues in trial. It provoke emotional response in the jury and otherwise tended to adversely affect the jury's attitude toward petition cosea bell wholly apart from its judgment as to his guilt or innocence of charged offenses. under citation omitted case: United States v. Alfred, 982 F. 3d 1273 — the jury exceed the bounds of rationality when it relied on accuser uncorroborated testimony.

• The trial was a non unanimous jury verdict, eleven vote guilty and one vote not guilty which was/is an error patent under Louisiana law and is unconstitutional under the 6th amendment.

Petition cosea bell asserts this difference results in unequal treatment consequently results in a violation of equal protection. the lack of unanimous verdict for convictions and the jury verdict on these convictions violated petition cosea bell constitutional due process rights of the 6th and 14th amendments to the U.S. constitution. under citation omitted cases: Apodaca v. Oregon, Ramos v. Louisiana, 206 L. Ed. 2d 583 (2020) - Teague v. Lane, State v. Curtis, 112 50. 3d 323 - State v. Bertrand, 6 50. 3d 738 - Edward v. Vannoy, 141 5. Ct. 1547 —

• Perjury testimony by accuser-witness resulted in a fundamental miscarriage of justice —

under citation case: Murray, 91 L. Ed. 2d 397 And 3 L. Ed. 2d 1991

• No credibility and defect of capacity by accuser by showing bias with an untruthfulness and untrustworthy —

this cause the danger with unfair prejudice, confusion of the issue, and mislead the jury. Defense trial counsel attack accuser credibility upon cross examination and by producing other state witnesses to provide the defect. Accuser-witness was mental incapacity relates to the ability to comprehend know, and correctly relate the truth. the prior inconsistent statements incriminated petition cosea bell. Accuse-witness gave false statements in trial testimony under oath and in written statements to law enforcement officials who testified as state witness, it was discovered in trial testimony by defense trial counsel.

The perjury testimony by the accuser calculated to create prejudice against the probative value of testimony is substantially outweighed by its prejudice effect. Before prior inconsistent statements can be accepted as nonhearsay and therefore probative additional evidence must also corroborate the facts sought to prove by these prior inconsistent statements. The uncorroborated hearsay evidence in the form of an out of court statements by witness-accuser who later denies it's truth is not alone sufficient to sustain a criminal conviction.

- the prosecutorial misconduct seriously affected the fairness of the trial and for a second trial. Permitting such damages to stand would seriously affect the integrity and public reputation of these proceedings.

- Petition Cosea bell would hold that the erroneous instructions constituted reversible plain error. The prosecutor behaved with casual disregard for his constitutional obligations and the rights of accused petition Cosea bell, it erodes the public's trust in justice system, and chips away at the fundamental premises of the rule of law. Petition Cosea bell argue prejudicial inconsistency statements not in evidence on the state's-D.A. opening and closing arguments. Additional evidence must also corroborate the facts sought to be proved by these prior inconsistent statements.

the testimony should have been inadmissible as substantive evidence. The convictions gained as a result of that perjured testimony affected the jury's verdict even though the testimony may be relevant only to the credibility of the witness-accuser. It is well established that evidence of a state witness potential bias and lack of credibility arising from witness-accuser perjured testimony petition Cosea bell is entitled to pursue.

- Petition Cosea bell was prejudiced by state prosecutor for improper false remarks bolstering testimony of witness-accuser. Such remarks violated petition Cosea bell due process rights. The state prosecutor improperly assured the jury that the testimony of the witness-accuser is credible. The state prosecutor presented fraudulent testimony evidence in the court in the form of a motion which the information contained therein was a verifiable contradiction to what was presented by the prosecutor during trial.

the state prosecutor relied on such fraudulent testimony evidence in establishing probable cause against petition cosea bell —

- Petition cosea bell claim of ineffective assistance of counsel and conflict of interest has shown that his attorney's representation fell below the objective standard of reasonableness and that counsel's deficient performance prejudiced petition cosea bell under *Strickland v. Washington* case. The counsel unprofessional errors, the proceeding would have been different a reasonable probability is a probability sufficient to undermine confidence in the outcome. the ineffective assistance of trial counsel violated petition cosea bell 6th amendment rights.

- Petition cosea bell has the burden to show that an exception applies to a timely filed post conviction relief application with L.A.C.C.R.P. Art. 930.8 and 930.4

Conclusion And Prayer

the state D.A. cannot find a new fact finders solely to permit the state to retry an essential element of its case unproven and overlooked at trial. This is and should be perpetuate careless prosecutorial trial preparation and practice. This criminal conviction case should be a reverse of conviction since the evidence was insufficient to sustain a conviction.

A new trial would not be appropriate relief with respect to the specific trial errors on which this court should agree.

- This clear errors should result in a reverse of conviction in petition cosea bell criminal case on the ground that the evidence was insufficient to convict should be treated as an acquittal and prohibits further proceedings. And due to procedural errors of law that impair effective presentation of the petition cosea bell case. under citation cases: *Bullington*, 451 U.S. 442 and *Burks v. United States*, 437 U.S. 1 —

- In this court reviewing petition cosea bell criminal conviction finds evidence insufficient to support guilty verdict, constitutional protection against double jeopardy bars retrial of petition cosea bell, under citation omitted cases: *State v. Walker*, 681 So. 2d 1023 and *State v. Dunn*, 709 So. 2d 852 —

- This court should be construed to elevate the burden of proof required to excuse petition cosea bell procedure default to clear and convincing evidence of petition cosea bell innocence.

CONCLUSION AND PRAYER

TO THIS HONORABLE COURT JUSTICE, PETITIONER COSEA BELL PRAYS,
IN THE INTEREST OF JUSTICE, THAT THIS HONORED COURT, REPLY IN
KIND TO THIS INDIVIDUAL JUSTICE AND FOR CONSIDERATION FOR HIS
WRIT OF CERTIORARI APPLICATION BY RENDERING OF A FAVORABLE
RESPONSE TO THE PROOFS PRESENTED HEREIN.

Respectfully Submitted,

Cosea Bell

Date: January 5, 2026



REASONS FOR GRANTING THE PETITION

this is a WARRANT CONSIDERATION OF PETITION COSEA BELL WRIT OF CERTIORARI based on:

- Asking for DISCRETION REVIEW
- A Good Cause
- The need to CORRECT a CLEAR ERROR OF LAW AND FACTS
- To prevent extraordinary Deprivation of Rights and Patently Unfairness

- Petition COSEA BELL seeking a writ for review for the denied post conviction Relief plea agreement.

Petition COSEA BELL did what was purported to do which was to narrowly create an equitable basis for cause following procedural default that caused prejudice. The State-District Attorney deliberate choice that significantly diminished petition COSEA BELL ability to assert trial ineffectiveness claims. The State's-District Attorney procedural frame work that made ineffective quality as cause for a procedural default in this criminal case. This was a unfair and biased trial.

This writ for Review is for a post conviction Relief and plea agreement mechanism for addressing constitutional defects in convictions. This Court have acknowledge it is a vital vehicle for the wrongfully convicted to obtain Relief, urging that innocence play a prominent role in administration.

- Petition COSEA BELL post conviction Relief claims or violations of the equal protection clause, Double Jeopardy clause, and the Ex post facto clause. In the event that trial testimony was introduced that is so unduly prejudicial that it renders a trial fundamentally unfair. The due process clause of the fourteenth amendment provides a mechanism for relief.
- This Court should take into consideration the harm done by the petition COSEA BELL in imposing sentence and the evidence adduced in this criminal case was illustrative of the harm caused by petition COSEA BELL criminal offenses and convictions.
- Petition COSEA BELL has the burden shown that an exception applies to a timely filed post conviction Relief applications with LA. C. CR. P. ART. 930.8 and 930.4
- Petitioner COSEA BELL conviction and sentence are unconstitutional because the petitioner COSEA BELL did not received effective assistance of counsel as guaranteed by the Louisiana Constitution of 1974 Article 1 and 13 and the sixth amendment of the United States Constitution, Counsel was ineffective for conflict of interest —

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Cosea Bell ^{D.C. #318282}

Date: January 5, 2020

