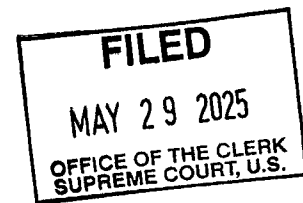


25-6799

No. \_\_\_\_\_

ORIGINAL



IN THE

SUPREME COURT OF THE UNITED STATES

SALENA NICOLE GLENN-Petitioner

VS.

WARDEN, ERIN MALDONADO-Respondent

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES OF  
APPEALS, FOR THE SIXTH CIRCUIT

"WRIT OF CERTIORARI"

SALENA NICOLE GLENN

OHIO REFORMATORY FOR WOMEN

1479 Collins Ave.

Marysville, Ohio 43040

### QUESTION(S) PRESENTED FOR REVIEW

1. Does the warrantless seizure, arrest, and no search warrant of a legally parked vehicle occupant without probable cause or reasonable suspicion; violate the Fourth Amendment's protection against unreasonable searches and seizures. FRUIT OF THE POISONOUS TREE DOCTRINE
2. Does the use of instant excessive force and pointing a firearm at an unresisting American citizen in a non-threatening context constitute a violation of clearly established constitutional rights under the Fourth and Fourteenth Amendments.
3. Does a conviction obtained despite post-conviction evidence including third party confession and exculpatory evidence testimony from law enforcement, violate the Due Process Clause of the Fourteenth Amendment and Brady Violation.
4. Does a lower state court establish *due process*, in the term of separating a joint indictment violating Due Process Clause, without a motion filed; also the concern of deviation from the person of interest who admitted to committing the crime. Confrontation Clause
5. Does failure of trial counsel not requiring preservation of evidence for further review, and compelling confessions of the crime deprive petitioner of a *fair trial, effective assistant of counsel*, and *due process*. Sixth Amendment
6. Does a Federal courts refusal to grant Habeas Corpus relief, despite compelling exonerating evidence of actual innocence, undermine *fundamental fairness* and violates the Eighth and Fourteenth Amendments.

## LIST OF PARTIES

[x]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.

1. THE UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF OHIO,

EASTERN DIVISION-Glenn v. Balduf, 2024 U.S. Dist. LEXIS 170244

Glenn v. Baldauf, 2024 U.S. Dist. LEXIS 168867

2. THE SUPREME COURT OF OHIO- State v. Glenn, 2021, Ohio LEXIS 1135

Donnelly, J., dissents and would appoint counsel

3. THE COURT OF APPEALS OF OHIO, THIRD APPELLATE DISTRICT,

MARION COUNTY-State v. Glenn, 2021-Ohio-264

4. THE COURT OF COMMON PLEAS OF MARION COUNTY, OHIO,

GENERAL DIVISION- Marion App. No. 9-19-64, 2021-Ohio-264

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## INDEX TO APPENDICES

- Appendix A** United States Court of Appeals, For the Sixth Circuit, JUDGMENT,  
Filed February 25, 2025
- Motion for Request to Grant Certificate of Appealablity, filed  
November 4, 2024
  - Motion for Reconsideration of Denial Of Certificate of  
Appealablity, filed March 3, 2025(affidavit included)

- Motion to Alter or Amend Judgment/Federal Rules of Civil Procedure Rule 59(e), filed March 20, 2025 (affidavit included)

**Appendix B** United States Court of Appeals, For the Sixth Circuit, ORDER, Filed May 29, 2025

- Motion to Alter or Amend Judgment/Federal Rules of Civil Procedure Rule 59(e), filed June 23, 2025
- Notice of Appeal To A Court of Appeals from A Judgment/Order of A District Court, filed June 23, 2025
- United States Court of Appeals , For the Sixth Circuit, two letters, filed July 2, 2025
  1. Stating that the Motion to Alter to Amend Judgment is untimely
  2. Stating the appeal is being returned unfiled with no further action, enclosing a United States Supreme Court Packet

**Appendix C** United States District Court, Northern District of Ohio, Eastern Division, Judgment Entry, dated September 19, 2024

- Petitioners Traverse/Response to Respondents Answers/Return of Writ, filed February, 10, 2023
- Petitioners Objections to Magistrate Report and Recommendation, filed July 2, 2024

**Appendix D** The Supreme Court of Ohio, Entry, Filed June 8, 2021

**Appendix E** In the Court of Appeals of Ohio, Third Appellate District, Marion County, Ohio, Judgment Entry, filed February 1, 2021

- Brief of Defendant-Appellant, filed May12, 2020

**Appendix F** In the Court of Common Pleas of Marion County, Ohio, General Division, Judgment Entry Sentencing, filed March 19, 2021

In the Court of Common Pleas of Marion County, Ohio, General Division, Judgment Entry Sentencing, filed September 17, 2019

**Appendix G** Documents of Evidence/Information to Support Petition

- Affidavit of Illya Green, Case No. 3:22-CV-00908-SL Doc #15 Page ID #520
- Interview with Illya Green, Case No. 3:22-CV-00908-SL Doc #15 Page ID #521
- Affidavit signed by Det. Scott Sterling, Marion Police Department, Case No. 3:22-CV-00908-SL Doc #15 Page ID #530,531
- \*Transcript of Audiotaped proceedings, Pretrial Motion, Case No. 3:22-CV-00908-SL Doc #15 Page ID # 792 thru 829
- Case No.3:22-CV-00908-SL Doc #15 Page ID# 1050-1051
- Case No.3:22-CV-00908-SL Doc #15 Page ID# 1178-1179
- Case No.3:22-CV-00908-SL Doc #15 Page ID# 1254-1255
- Case No.3:22-CV-00908-SL Doc #15 Page ID# 1292-1293
- Case No.3:22-CV-00908-SL Doc #15 Page ID# 1354-1355
- Case No.3:22-CV-00908-SL Doc #15 Page ID# 1522-1525

Salena Nicole Glenn has included important facts within these appendices that presents evidence that is respectfully requesting to be reviewed, as to a claim involving a grave *miscarriage of justice*. Concerning one that is of actual innocence.

Schulp v. Delo, 513 U.S. 298; House v. Bell, 547 U.S. 518

All of the documents that hold the burden of proof of factual evidence are on the record within The United States District of Ohio, Eastern Division, Case No.3:22-CV-00908-SL, citing laws and facts as to this case. Constituting as a *Fundamental Miscarriage of Justice*. Glenn acquires the right to preserve all of these documents for the future if deemed necessary. Glenn respectfully and continuously request the dire need for professional legal assistance due to constitutional violations of being stripped of one's liberty and being under the Americans with Disabilities Act. 18 U.S.C.S § 3006 A (a) (1) (A) (F) (H) (I)

## TABLES OF AUTHORITIES CITED

### CASES:

Bobby v. Van Hook, 558 U.S. 4

Brady v. Maryland, 373, U.S. 83

Brady Violations

Crawford v. Washington, 541 U.S. 36

Edward v. Carpenter, 529 U.S.

Glenn v. Comm'r of Soc. Sec., 763 F. 3d 494

House v. Bell, 547 U.S. 518

Parrish Towns v. Smith, 395 F.3d, 251

Payton v. New York, 445 U.S.573

O'Neal v. Balcarcel, 933 F. 3d 618

O'Neal v. Lafler, 2018 U.S. Dist. LEXIS 158801

Schulp v. Delo, 513 U.S.298

United States v. Duguay, 93 F. 3d 346

United States v. Sanders, 796 F. 3d 1241

Wong Sun v. United States 371 U.S. 471

### RELATED CASES:

Mapp v. Ohio, 367 U.S. 643

State v. Barcus, 2022-Ohio-2491

State v. Burroughs, 169 Ohio St. 3d

State v. Davidson, 82 Ohio App 3d 282

State v. Banks-Harvey, 152 Ohio St. 3d 368

United States v. Botchway, 433 F. Supp2 d 163

STATUTES AND RULES:

18 U.S.C.S § 3006 A (a) (1) (A) (F) (H) (I)

21 U.S.C.S § 841 (1)

28 U.S.C.S § 1254 (1) (2)

28 U.S.C.S § 1257 (a)

28 U.S.C.S § 1651 (a) (b)

28 U.S.C.S § 2101(c)

42 U.S.C.S § 1983

CONFRONTATION CLAUSE

FED. R. CIV P.26 RULE 26 (d)

“Magna Carta”

“Mens Rea”

OHIO CRIMINAL RULE 16

OHIO EVID. R. 804

ORC Ann. 2953.21(A) (2)

U.S.C.S Fed. Rules Evid. R. 608

U.S.C.S Fed. Rules Evid. R. 609 (a) (1) (A) (B)

U.S.C.S Fed. Rules Evid.R.801

CONSTITUTIONS:

- Fourth Amendment, U.S. Constitution; Ohio Constitution, Article I §14
- Fifth Amendment, U.S. Constitution; Ohio Constitution, Article I §10
- Sixth Amendment, U.S. Constitution; Ohio Constitution, Article I §10
- Eighth Amendment, U.S. Constitution; Ohio Constitution, Article I §9
- Fourteenth Amendment, U.S. Constitution; Ohio Constitution, Article I §16
- FRUIT OF THE POISNOUS TREE DOCTRINE

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

Petitioner, Salena Nicole Glenn, respectfully prays that a Writ of Certiorari issue to review the judgment(s) below:

**OFFICIAL/UNOFFICIAL REPORTS OF  
OPINIONS AND ORDERS BELOW:**

☒ For cases from **federal courts**:

The opinion of the United States Court of appeals for the Sixth Circuit appears at Appendix A and B to the petition and is

☒ reported at 2025 U.S. App.LEXIS 13166\* | 2025 LX 142772

☒ reported at 2025 U.S. App.LEXIS 4426\* | WL 1118377

The opinion of the United States District Court, Northern District of Ohio, Eastern Division appears at Appendix C to the petition and is

☒ reported at 2024 U.S. Dist. LEXIS 168867\* | 2024 LX 38210 | 2024  
WL 4233881

## BASIS FOR JURISDICTION

☒ For cases from **federal courts**:

The date on which the United States Court of Appeals for the Sixth Circuit decided my case was February 25, 2025.

A copy of the above decision appears at Appendix A

☒ A timely petition for rehearing was denied by the United States Court of Appeals for the Sixth Circuit on the following date: May 29, 2025, and a copy of the order denying rehearing appears at Appendix B.

The United States Supreme Court has jurisdiction under 28 U.S.C. S §1257 (a) and respectfully request to be invoked under 28 U.S.C. S §1254 (1) (2). This petition specifically renders federal constitutional rights as an issue and articulates a conflict of error. Holding a national importance of urgency and a great public interest as to substantial Constitutional provisions concerning the rules of law and violations. This case presents substantial questions involving within the Fourth, Fifth, Sixth, Eighth, and Fourteenth Amendments of the United States Constitution. Glenn sets forth to show that this case is such an imperative public importance as to justify deviation from normal appellate practice and to require immediate determination from this court. Including important review of federal law that warrants this courts review. U.S.C.S FED. RULES CIV. P.26; U.S.C.S FED.RULES EVID.R.801

\*The United States Court of Appeals, for The Sixth Circuit, sent (two) formal letters to Ms. Glenn, filed July 02, 2025. (Appendix B) Enclosing a United States Supreme Court Packet revising this claim to be presented to this court. 28 U.S.C.S § 1651(a) (b); 28 U.S.C.S § 2101(c)

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

### I. Constitutional Provisions:

#### 1. Fourth Amendment- Unreasonable searches and seizures

-Violation: A man in all black approached Salena Nicole Glenn at gunpoint, using instant excessive force removing her from a legally parked vehicle. (Case No. 3:22- CV- 00908-SL, Doc #14-1, Page ID #454) these actions took place without a warrant, no probable cause, or any apparent justification (e.g. no traffic stops or exigent circumstances). Payton v. New York, 445U.S.573 The transcripts of audiotaped proceeding is warranted for important review that attests to this claim (Case No. 3:22-CV-0098 SL, Doc #15 Page ID 792-829; Appendix G) Prosecution never disclosed the questionable matter of the search, it was stated not to be discussed. *Id Brady Violation*

-Legal Concern: The circumstances of Ms. Glenn's detention-being removed with instant force at gunpoint from a legally parked vehicle without a warrant or probable cause; raise critical Fourth Amendment questions. A warrantless and nonconsensual seizure without probable cause is a potential violation of Glenn's Fourth Amendment right. No search warrant was ever presented to this case involving Glenn. (Case No. 3:22-CV-00908-SL Doc #15, Page ID 792-829, Appendix G)

▪ Det. Scott, Marion Police Department, signed a sworn affidavit that attests to stopping Glenn sitting in a parked vehicle. "*Mens Rea*" (Case No. 3:22-CV-00908-SL Doc #14-1, Page ID #530, Appendix G)

2. Fifth Amendment Protection against Self –Incrimination & Due Process

-Violation (Implied): If Glenn made any statements under duress or coercion; implicates this amendment.

-Legal Concern: Glenn was questioned after being instantly forced out of a legally parked vehicle at gunpoint at the scene. "Mens Rea"

3. Sixth Amendment To be confronted with the witness against; and to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense. Crawford v. Washington, 541 U.S. 36 Taking in account that Illya Green was the one who was being investigated, he dealt with the informant, informed the officer of the exact location of where he put the drugs, Green confessed an plead guilty to the crime and was sentenced to 12 ½ years mandatory. It was stationed in the process, that he was not to be called for a witness on the behalf of Ms. Salena Nicole Glenn, to support Glenn's defense of not having any knowledge or not knowing, which complies with her innocence U.S.C.S Fed. Rules Evid.R. 607 U.S.C.S Fed. Rules Evid. R. 608

-Violation: Prosecution withheld exculpatory evidence, Illya Green's confessions and Officer Stacy McCoy's, (proffer) testimony , "that she believed the drugs were not Salena Nicole Glenn's". Brady v.

Maryland, 373 U.S. 83; U.S.C.S Fed Rules Evid. R. 801 transcripts on record are crucial to attest to the actions within this petition. *Id*

Trial attorney seemed to have purposely set up ineffective assistance of counsel on the record. (Case No. 3:22-CV-00908-SL Doc #15, Page ID 1522,-1523) Counsel presented himself as incompetent, not presenting a full and fair defense, especially when he did not preserve the video for future review in the courts or calling the key witness, and suppressing drugs. *Id* U.S.C.S Fed. Rules Evid. R. 608(a) (b) United States v. Duguay, 93 F. 3d 346 Attorney was informed that Glenn was under the Americans with Disabilities Act, and did not disclose this information to assist in the Defense. Glenn v. Comm'r of Soc. Sec., 763 F. 3d 494 Glenn informed counsel, she has severe asthma with rods and screws in her right leg. (\*noting that there was no way possible Glenn could have committed the crime of running out of the house, beating everybody to hide contraband)

Legal Concern: The record of the whole transcripts are important to review to attest to this claim as a *fundamental fairness* holding a great miscarriage of justice at The United States District Court, Northern District of Ohio, Eastern Division Case No.3:22-CV-00908-SL. Glenn needs professional legal counsel to assure the conflict of errors and constitutional violations that are of national importance be addressed. 18 U.S.C.S§3006A (a) (1) (A) (F) (H) (I) Being that Glenn is detained and does not have the ability to adequately pursue claims.

Glenn v. Comm'r of Soc. Sec., 763 F. 3d 494 Glenn did bring ineffectiveness of counsel to the attention of the lower court.

(Case No.3:22-CV-00908-SL, Doc #14-1, Page ID #248)

4. Eighth Amendment –Cruel and Unusual Punishment

-Violation: Glenn was sentenced to 20 years with 18 being mandatory. Glenn holds no background as to this type of crime/conviction and is not a threat to society and has maintained a level one security level of incarceration for six years of a non-violent offense. (Case No.3:22-CV-00908-SL, Doc #14-1, Page ID #576, 577) \*Glenn was also convicted of the drugs found in the house, attesting Glenn was instantly removed with excessive force from a legally parked vehicle. *Id* (Case No.3:22-CV- 00908-SL, Doc #14-1, Page ID #530,531)

5. Fourteenth Amendment – Due Process Clause

-Violation: Glenn sentenced to 20 years with 18 being mandatory in prison despite exculpatory evidence. Illya Green was the target of the investigation, he was being watched according to police reports that are on record. *Id* Confessions were given by Illya Green over multiple times providing proof of him taking responsibility for this crime that he proclaimed. U.S.C.S Fed.Rules Evid. R. 609 (a) (1) (A) (B) also Officer Stacey McCoy stating the she knew the drugs were not Glenn's). (Case No.3:22-CV- 00908- SL, Doc

#14-1, Page ID # 455-457, 459-464, 520-522) OHIO EVID. R.804;

U.S.C.S Fed. Rules Evid.R. 608 (a) (b); U.S.C.S Fed Rules Civ. Proc.

R.26; Wong Sun v. United States 371U.S. 471

\*Salena Nicole Glenn did not manufacture or distribute any drugs. 21

U.S.C.S § 841 (1) However, the informant only dealt with Illya Green

on more than several occasions, (via video) and this information was

not provided to the jury or given to Glenn for defense. *Id* OHIO

CRIMINAL RULE 16 It was advised by the informant when asked,

he stated, Glenn was Illya Greens "Girlfriend". (Case No.3:22-CV-

00908-SL, Doc #14- 1, Page ID #491, paragraph 4) the jury was

advised differently, with the abolishment that Salena Nicole Glenn

was the drug dealer, not even never knowing that there was a

confession and testimony. Bobby v. Van Hook, 558 U.S. 4

\*noting Glenn never distributed or sold any drugs knowingly. And

had it been revealed, there was no reasonable doubt the jury would

have convicted Ms. Glenn. U.S.C.S FED.RULES EVID.R.801

-Legal Concern: Failure to consider or disclose exculpatory evidence

may constitute a due process violation, particularly under Brady v.

Maryland (1963); U.S.C.S FED.RULES EVID.R.801 (d) (2) (E)

## 6. FRUIT OF THE POISIONOUS TREE DOCTRINE

-Violation: Glenn was instantly removed with force from a legally

parked vehicle, at gunpoint. Having no knowledge nor committing or having any involvement in any criminal activity. Glenn had two items in her hand when forcibly removed, pills and keys,\* enforcing that Glenn could have never been reaching to hide anything considering Glenn's hands were occupied (Case No.3:22- CV- 00908-SL, Doc #14-1, Page ID # 454,530-531, 532) this information was also hidden from the jury. *Id*

## II. Statutory Provisions

### 1. 21 U.S.C.S. § 841 Federal and State Drug Laws

-Misapplication concern: The conviction under federal or state drug Statutes stands. Considering, Illya Green placed the drugs in the location without Glenn's knowledge. Case No.3:22-CV-00908-SL, Doc #14-1, Page ID #520; Doc #15 Page ID 1359-1360) U.S.C.S Fed. Rules Evid. R. 608 (a) (b) Police reports states that they pulled Illya Green over on several occasion driving vehicles registered in Glenn's name. But, not one time did they mention during the traffic stops that they found any contraband or anything illegal. (Doc. #14-1, Page ID # 491) In addition, Glenn was not present during the traffic and did not have any intent or participation in the manufacture, dispense, or distribute with any controlled substance. *Id*

### 2. 42 U.S.C.S. § 1983 – Civil Action for Deprivation

-Application: This statute concerns individual's rights to address

the government officials who, under color of law, that have violated constitutional rights.

-Relevance: Glenn needs professional legal assistance of a counsel to assist in addressing matters of national importance considering being stripped of ones liberty and under the ADA. 18 U.S.C.S§3006A (a) (1) (A) (F) (H) (I); Glenn v. Comm'r of Soc. Sec., 763 F. 3d 494

3. Brady Disclosure Obligations, derive from Brady v. Maryland, 373, U.S. 83

-Violation: The prosecution failing to disclose the confessions given by Illya Green and the officer's statement that she "knew the drugs were not Glenn's", may constitute a Brady Violation and *Due Process. Id*  
Also the concern of the video, withholding exculpatory information that Glenn did not deal with any informant on the behalf of selling any drugs. *Id* \*Ideally in circumstances of confession they are considered, Illya Green plead guilty, sentenced to 12 ½ years mandatory, and was initially being followed according to police reports concerning their investigation, providing them with several confession as to his involvement in the crime he occurred. O'Neal v. Balcarcel, 933 F. 3d 618

There are potential violations of statutory duties under both civil and criminal procedure law.

## STATEMENT OF THE CASE

This case arises from an incident in which Ms. Glenn was sitting in a legally parked vehicle on March 21, 2019, when a man in all black approached Glenn with a fire-arm pointed directly at Glenn's head. Glenn was instantly removed with force out of the vehicle, without any presentation as to the announcement of authorized actions due to no crime was taking place. No warrant was presented, no probable cause or reasonable suspicion to justify a search or detainment of being tackled to the ground and handcuffed. *Id* (Doc #14-1, Page ID # 454) Glenn was not pulled over in a traffic stop. Neither did any legal binding of a vehicle seizure, in reference to being involved in a crime occur due to finding contraband in a vehicle. United States v. Sanders, 796 F. 3d 1241

Furthermore, Illya Green came forward and provided sworn confessions, stating that he had placed drugs in Ms. Glenn's vehicle without her knowledge, admitting several times taking ownership of this crime. *Id* (Doc #14-1, Page ID#s 455-460, 463, 520-524) Illya Green has been pulled over driving vehicles registered in Glenn's name as to the (30) thirty day investigation that was upon him. (Doc.#14-1, PageID # 491) \*Green described exactly the amount, the identification, and the location of the contraband. *Id* (Doc.14-1, Page ID # 455, 456) How could he have known if he did not place the illegal substance in the area found. Moreover, Officer Stacey McCoy involved in the investigation admitted that "she knew the drugs did not belong to Ms. Glenn", stating it as a concern. *Id* (Doc #14-1, Page ID#457)

The jury would have known that Glenn did not commit the crime accused of; had evidence been presented instead of disclosed, denied, and not mentioned as to concern of the constitutional values of its standards. The 2 (two) letters that were exhibits A and B in trial were not admitted for evidence, for the jury to view. The trial attorney effectively computed Illya Green confessions when he did not call him as a witness. Edward v. Carpenter, 529 U.S. 446 The several confession of Illya Green's stating the drugs were his, taking ownership for the crime of his cause. (Doc. #14-1 Page ID 459-464) these exhibits exhibits were not admitted for evidence, for the jury to view.

Despite of compelling evidence that Glenn neither possessed nor had knowledge of the contraband found in the vehicle, petitioner, Salena Nicole Glenn was convicted of drug trafficking and sentenced to twenty (20) years, with 18 being mandatory. Glenn had no knowledge of a crime being committed, was not committing a crime, and had no involvement in a crime. 21 U.S.C.S §841 (1)

Throughout the pre-trial proceedings, key constitutional issues were deterred to be discussed concerning the search warrant. *Id* Ineffective assistant of counsel can be suggested as to a concern of not suppressing key evidence that was of importance that could have extricated Glenn, U.S.C.S Fed.RulesEvid.R.608 (a) (b); (Case No.3:22-CV-00908-SL, Doc # 15, Page ID # 792-829) also, the incompetency of counsel as to calling forth the key witness, Illya Green, whom took responsibility of this/his crime,

or Officer Stacey McCoy, stating she knew the drugs did not belong to Glenn. *Id* The attorney failed to investigate key witness (Illya Green) who admitted to police more than several time that he was involved in the crime and that petitioner, Glenn, had played no dealings in nothing. (Case No. 3:22-CV-00908, Doc.14-1, Page ID#523-524) Parrish Towns v. Smith, 395 F.3d, 251. Therefore, the jury was construed, not having the account of all the factual evidence. And the verdict of the jury would have been different had they received all of the actual/factual evidence.

If the jury would have known about any or all; of the several confession, that were stated and written by Illya Green. This could have very well been the straw that broke the camel's back establishing a reasonable doubt as to the jury finding petitioner Glenn, guilty. Glenn was also charged with contraband that was in the home and she was in a legally parked vehicle when approached.

The exculpatory evidence that was disclosed and the matter of the illegal search is of great concern. Fed.Evid.801 (d) (2) (E); Fourth Amendment; FRUIT OF THE POISONOUS TREE \*Noting the legally parked vehicle was part of a crime and was not seized. United States v. Sanders, 796 F 3d 1241

\*On the record by the trial court it was stated:

- "In this case, we are dealing with a search of a home." *Id* (Doc #15, Page ID # 821)
- You can't get into it as a basis for the search warrant." (Doc #15, Page ID # 1050)
- "But what I am telling you is the basis for the search warrant is off limits. It is a matter of law. *Id* (Doc#15, Page ID # 1051)

- Officer Sam Walter's testimony, "We discussed the target house, what search warrant was for, what each individual's role was going to be during the search warrant". (Doc #15, Page ID # 1179)
- Granted, I don't know all the evidence, and I am not trying to impede anybody's argument, but this is a "not my drug "case, not "the drugs were tampered with," not "the wrong drugs were tested." At least no one has made those arguments. *Id*(Doc.15, Page ID 1255) \* *Glenn was still charged with tampering and drugs.*
- "This is a case about March 21<sup>st</sup> and a search of the house". *Id*(Doc #15, Page ID #1355)
- "I don't know if you're trying to set up an "ineffective assistance of counsel" claim, but what I just saw in there is a prime example of it. *Id*(Doc # 15, Page ID 1522-1523)
- "Right. And that's an excellent point you could have simply made by saying, "where anywhere, is her name on anything? The search warrant, anything? (Doc#15, Page ID #1523)
- "You can appeal on it". *Id*(Doc # 15 Page ID 1524)

\*These statements from the transcripts are reserved for a good cause providing a stern reason for review. The trial court transcript proceedings are placed in the United States district Court, Northern District of Ohio, Eastern Division, Case No. 3:22-CV-00908-SL, preserved for future review.

\* The joint indictment was separated in a dispute which is very important for review. (Pre-Trial Motion-Doc #15 Page ID 792-829, Appendix G)

- "Mr. Ratliff : But there is no motion to sever and have them--.The Court : Well, I think the Court can do it to sua sponte in the interest of justice.(Doc.15 Page ID #822 lines 21-24)
- Mr. Ratliff : Because there's been no continuance or motion on anybody's trial --.(Doc.15 Page ID #823, line 25, 824 line 1)

Did the trial court meddle in the process of separating a joint indictment.

\* A Post-conviction/ Petition to vacate can be an important aspect to any claim. On January 19, 2021 Glenn filed only (1) timely post-conviction, by mail. The state, stated they received the PC on January 28, 2021 and January 29, 2021. The trial transcripts were filed on January 29, 2020. ORC Ann. 2953.21(A) (2) There was no notice sent to Glenn regarding any decision or to the concern of the PC being *sealed*, according to the docket. (Doc. 14-1 Page ID #780)

The decision seemed to have been discretely pondered underneath another judgement entry. Considering that the PC is a civil concern and in the judgment entry it was followed by was a criminal matter. (Doc. 14-1 Page ID #739-743) Glenn was not addressed or even notified as to the judgment entry of the PC or of its sealing. *Id*

The docket can attest to these attributions. *Id*

\*Ohio Reformatory for Women has continuously impeded upon this claim, impelling motives seemingly by taking Glenn's legal box, withholding legal mail, unnecessary searches, moving Glenn multiple times, giving intuiting misleading tickets referring them to RIB to acquire solitary, directing Glenn to attend unplanned being intimidating. And denying programing due to Glenn pursuing legal matters. These complicated conversions respectfully requires that Glenn needs the assistant of professional legal counsel, of one being detained and stripped of his liberty. 18

U.S.C.S § 3006 A (a) (1) (A) (F) (H) (I)

## REASONS FOR GRANTING THE PETITION/WRIT

The constitutional violations and the articulate conflicts presented are of national importance. They implicate well-established constitutional protections that are foundational to the American legal system. The issues at stake are not only profound importance to Glenn's individual liberty, but also nationwide significance to the administration of justice for all American's. A "Writ of Certiorari" is warranted to resolve these conflicts and clarify essential constitutional principles. With all due respect, this court has jurisdiction to prevail justice under 28 U.S.C.S §1257 (a) to present *fundamental fairness*.

"Writ of Certiorari" is warranted for the following reasons:

I. Conflict with Decisions of other Courts on Important Federal Questions

The lower courts can be divided for when such encounters become unconstitutional seizures, withholding exculpatory evidence, and a miscarriage of justice. Glenn has presented every standard in regards to actual/factual evidence being on the record. *Id* According to Rule 10 this petition calls upon this court to exercise supervisory power.

1. Fourth Amendment-Warrantless seizure and search without probable cause. Clarification is needed from within this court on whether instant excessive force while being armed, condoning warrantless removal from legally parked vehicle without immediate threat or

suspicion violate and relate precedents. Fourth Amendment; FRUIT OF THE POISONOUS TREE

2. Brady Violations-Suppression and disregarded Exculpatory Evidence.

The continued prosecution and conviction of Ms. Glenn, despite third-party confessions and acknowledgement by law enforcement that the drugs knowingly were not Glenn's. This circumstance alone is at odds with decisions from other state and federal courts. Brady V. Maryland Several circuit and state courts have found reversible error under similar circumstance.

II. Apart from Accepted Judicial Procedures Rule 11; 28 U.S.C.S §2101(a) (c) (d) - This petition has been set to be presented to this court for good reasoning.

3. Due Process and Actual Innocence-The failure of the lower courts to correct a conviction in the face of evidence establishing Glenn's innocence to the crime convicted, constitutes a serious departure from accepted judicial standards of *due process* and *fundamental fairness*. Glenn presented this petition, after hoping that the lower courts would have abided by justice. The continued detainment of a demonstrably innocent person conflicts with the principles set forth in House v. Bell, 547 U.S. 518

III. Important Federal Question Needing Resolution-"*Magna Carta*"

4. National Implications for Prosecutorial Misconduct and Police

Accountability-This case presents an urgent need to address Constitutional limits of police conduct, prosecutorial discretion, and judicial responsibility when exculpatory evidence surfaces during and after arrest. This courts review is essential to confirm *due process* protections and provide guidance for similar cases nationwide. The "Writ of Certiorari" is warranted to resolve these conflicts and constitutional principles.

The issues at stake are not only of profound importance to Glenn's individual liberty, but also of nationwide significance to the administration of justice for future generations. Petitioner is respectfully pleading to this court for this "Writ of Certiorari" to be reviewed. The questions addressed are of exceptional/ national importance concerning the constitution, law enforcement accountability, due process, and the government's constitutional obligation to disclose and act upon exculpatory evidence. *Id* Respectfully requiring this court to correct a fundamental injustice, prevailing fundamental fairness.

This "Writ of Certiorari" holds a national importance of urgency and great public interest as to substantial Constitutional provisions concerning the *rules of law* and violations of the Fourth, Fifth, Sixth, Eighth, and Fourteenth Amendments of the United States Constitution.

Respectfully requiring from within this Court to review as to the seriousness of legal/constitutional error. 28 U.S.C.S §1257(a); 28 U.S.C.S §1254 (1) (2)

Glenn presents to this court, truth of sufficient factual evidence that are available for the record in whole at The United States District Court, Northern District of Ohio, Eastern Division, Case No.3:22-CV-00908-SL. In *awe*, Glenn brings forth “specific allegation” that provide a “reason to believe that the petitioner may, if the facts are more fully developed, be able to demonstrate entitling relief”.

Respectfully, this petition for a “Writ of Certiorari could be considered to be granted.

There is an important aspect of fundamental fairness due the concern that Glenn was charged with a conviction of what was also inside of the house (7 years mandatory) that she did not reside at or was neither inside of. Being sentenced to 20 years with 18 being mandatory with no criminal background of such activity nor history, cannot justify cruel and unusual punishment. Eighth Amendment, U.S. Constitution; Ohio Constitution, Article I §9

\*Noting in Appendix E are important documents, that appellate attorney did preserve several issues to be presented for future review. (Case No.3:22- CV- 00908-SL, Doc #14-1, Page ID # 293, the last paragraph)

## CONCLUSION

The facts described within this petition raises significant constitutional concerns under the Fourth, Fifth, Sixth, Eighth, and Fourteenth Amendments. Legal remedies are required from within this court, due to this case being public holding a great general interest and involves substantial constitutional questions of concern.

Actions taken qualify for a subject of question of rights and privileges of the U.S. Constitution, and the Writ of Habeas Corpus. With all due respect, the founding fathers created the Constitution to protect the rights of all Americans. Glenn has shown that the conflict of articulate errors involving constitutional violations constitute as defensibly wrong and fundamentally unfair.

The State of Ohio courts may have given Salena Nicole Glenn an opportunity to the right to describe "a justiciable claim" as one that is "properly brought before a court of justice for relief." This claim presents a rare but urgent confluence involving that of a wrongful seizure, prosecutorial misconduct, and demonstration of innocence.

\*Noting the lower courts redeems to have no further interest in the claim by sending a letter, seemingly to be handing over jurisdiction, stating "We are returning this document over to you unfiled and with no further action. Enclosed is a United States Supreme Court packet."(Appendix B)

Glenn respectfully calls upon this court in dire need of professional counsel.

Considering, Glenn is being detained and stripped of ones liberty 18 U.S.C.S § 3006

A (a) (1) (A) (F) (H) (I); Glenn v. Comm'r of Soc. Sec., 763 F. 3d 494

This petition presents important questions of federal law and constitutional violations that warrants this courts review. 28 U.S.C.S 1254 (1) (2); 28 U.S.C.S 1257(a)

The petition for a "Writ of Certiorari" should be granted.

Respectfully submitted,

Salena Nicole Glenn

Salena Nicole Glenn #104431  
Ohio Reformatory for Women  
1479 Collins Ave.  
Marysville, Ohio 43040

I, Salena Nicole Glenn, declare under penalty of perjury that the foregoing is true and correct. 28 U.S.C. §1746; 18 U.S.C. §1621

Salena Nicole Glenn

Salena Nicole Glenn #104431  
Executed on January 28, 2026