

25-7205

No. _____

IN THE
Supreme Court of the United States

HUMPHREY DANIELS III,
Petitioner,

v.

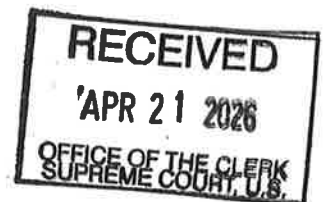
UNITED STATES OF AMERICA,
Respondent.

On Petition for a Writ of Certiorari to the
United States Court of Appeals for the Armed Forces

**LETTER OF SUPPLEMENTAL AUTHORITY
PURSUANT TO SUPREME COURT RULE 15.8**

HUMPHREY DANIELS III
Petitioner, pro se
216 Aragona Drive
Fort Washington, MD 20744
(904) 864-6038

Dated: April 14, 2026



Petitioner respectfully notifies the Court of intervening authority issued after the submission of the Petition for a Writ of Certiorari: *Villarreal v. Texas*, 607 U.S. ____ (2026). This decision reinforces the Sixth Amendment principles underlying the questions presented in the Petition.

I. *Villarreal* Reaffirms the Constitutional Importance of Attorney–Client Consultation

In *Villarreal*, the Court considered whether a trial court’s “qualified conferral order” limiting discussion of a defendant’s ongoing testimony during an overnight recess violated the Sixth Amendment. The Court upheld the narrow restriction only after emphasizing the constitutional centrality of strategic consultation between attorney and client.

The Court explained:

- “A defendant’s access to advice about trial strategy remains essential to the collaborative enterprise that is criminal defense.” *Villarreal v. Texas*, 607 U.S. ____, ____ (2026).
- The Sixth Amendment guarantees “the advice of counsel unrestricted by judicial interference.” *Id.* at ____.
- Even during sensitive trial phases, protected strategic consultation remains constitutionally shielded. *Id.* at ____.

Villarreal underscores the constitutional importance of protected attorney–client consultation. The restriction there was explicit and subjected to on-the-record judicial evaluation.

II. Relevance to the Questions Presented

Villarreal reinforces the Sixth Amendment principle that burdens on the attorney–client relationship warrant on-the-record judicial scrutiny.

The Petition does not ask this Court to resolve the underlying Sixth Amendment issue in the first instance. Rather, Petitioner’s claim concerns the alleged concealment of a pretrial

assignment accepted by defense counsel that imposed a mandatory 24-month Active Duty Service Commitment to the Government's appellate division (App. F-1 at App. 21-22; App. F-2 at App. 23-24). That status was not disclosed to the military judge or to Petitioner. As a result:

- No inquiry occurred under Rule for Courts-Martial (R.C.M.) 901(d), promulgated under 10 U.S.C. § 836, requiring on-the-record judicial inquiry into potential conflicts of counsel to safeguard Sixth Amendment rights.
- No waiver was obtained.
- No factual record addressing the issue was ever developed.
- Appellate review—including this Court's prior consideration—occurred before the alleged conflict information became known.

Unlike *Villarreal*—where the restriction was explicit, narrowly tailored, and evaluated on the record—the Petition alleges no disclosure, no inquiry, and no record concerning the alleged pretrial conflict. The Sixth Amendment claim therefore was never evaluated under this Court's governing framework in any court.

III. Relevance to the Requested Disposition

In light of Villarreal v. Texas, which emphasizes the need for on-the-record judicial scrutiny when the attorney-client relationship is burdened, further consideration may be warranted.

Because the alleged pretrial conflict was never disclosed and no judicial inquiry occurred under R.C.M. 901(d)—a binding rule promulgated pursuant to 10 U.S.C. § 836 requiring an on-the-record judicial inquiry into potential conflicts of counsel—no record was created on which the Sixth Amendment framework could be applied. Further consideration may therefore be appropriate to permit development of the record and application of this Court's governing Sixth Amendment framework.

CONCLUSION

Petitioner respectfully submits this supplemental authority for the Court's consideration in evaluating the pending Petition for Writ of Certiorari.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Humphrey Daniels III".

HUMPHREY DANIELS III
Petitioner, pro se
216 Aragona Drive
Fort Washington, MD 20744
(904) 864-6038

Dated: April 14, 2026