

ORIGINAL

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OFFICE OF THE CLERK
SUPREME COURT, U.S.

No. 26-357

IN THE
SUPREME COURT OF THE UNITED STATES

WILLIS JONATHON DAVID CARMACK,

Petitioner,

v.

VALLEY GREEN PARK, WENDY JO
SONNIER,

Respondents.

ON PETITION FOR A WRIT OF
CERTIORARI TO THE MINNESOTA
COURT OF APPEALS

PETITION FOR WRIT OF CERTIORARI

Willis Jonathon David Carmack
Pro se Petitioner
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QUESTIONS PRESENTED

1. Whether the Minnesota courts deprived Petitioner of procedural due process and equal protection under the **Fourteenth Amendment**, and substantially burdened his rights under the **Second Amendment**, by granting summary judgment and limiting discovery in this housing purchase agreement case, where Petitioner paid property taxes for three years without a deed, pursued the purchase option with the only licensed lender tied to the agreement, faced fraudulent advice to “go seek financing elsewhere,” retaliatory conduct by Wendy Jo Sonnier (she/her), obstruction of Petitioner’s independence written in the complaint through removal of law enforcement, pro se barriers, and denial of the clocks interpretation as protected First Amendment speech and religious expression tied to equal access to law enforcement.
2. Whether the lower courts’ holdings—that Minn. Stat. § 504B.441 creates only a defense rather than an affirmative claim, that contract arguments were forfeited, and that no genuine issues of material fact existed on financing fraud, the option timeline, tax payments without a deed, and retaliation—conflict with this Court’s precedents on due process, equal protection, protected property interests, pro se rights, and review of housing matters involving private actors obstructing a citizen’s independence and access to law enforcement.

PARTIES TO THE PROCEEDING

Petitioner: Willis Jonathon David Carmack, *pro se*, full-time father with full physical custody and joint legal custody of his son.

Respondents: Valley Green Park (Valley Green MHC LLC) and Wendy Jo Sonnier (she/her). Continental Community Sales II LLC and Chartwell Financial, LLC are central to the financing and lease issues.

RELATED PROCEEDINGS

- Scott County District Court, File No. 70-CV-24-5352 (Summons & Complaint filed April 18, 2024; Affidavit of Service on Wendy Jo Sonnier (she/her) dated March 20, 2024).
- Scott County District Court, File No. 70-CV-24-12511 (eviction proceedings; motion in limine granted October 18, 2024; transcripts from hearings on September 12, 2024, October 18, 2024, and November 5, 2024).
- Minnesota Court of Appeals, No. A25-0732 (nonprecedential opinion filed February 17, 2026; affirmed; appeal construed as taken from March 27, 2025 judgment).
- On June 20, 2025, the Court of Appeals granted Respondents' motion to strike Petitioner's transcript requests from the eviction proceeding (70-CV-24-12511). On July 11, 2025, the Court of Appeals denied Petitioner's motion to supplement the record with transcripts and filings from the eviction proceeding.
- Minnesota Supreme Court further review denied April 29, 2026.

- Related: Eighth Circuit Motion to Compel, No. 26-1204.

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JURISDICTION

28 U.S.C. § 1257(a). The petition is timely under Sup. Ct. R. 13. Judgment of the Minnesota Court of Appeals, dated April 30, 2026 (see page A-1).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

U.S. Const. amend. XIV, § 1.

U.S. Const. amend. I.

U.S. Const. amend. II.

Minn. Stat. § 504B.441; Minn. Stat. § 559.21; manufactured home lease and purchase option statutes; lender licensing and consumer protection statutes as applied. The relevant portions of these two statutes are reproduced at the back of Petitioner's appendix. (A-372).

STATEMENT OF THE CASE

This is a housing purchase agreement Fourteenth Amendment violation. Petitioner, *pro se*, entered into a contract agreement to purchase a mobile home (serial #112-000-H-F-B501591AB) located at 132 Valley Green Park, Jordan, Minnesota 55352 on **June 21, 2021** (lease dated **June 16, 2021** per addendum). Petitioner, a full-time father with full physical custody and joint legal custody, communicated with Wendy Jo Sonnier (she/her) and Valley Green Park, paid deposits, and made arrangements toward the purchase agreement in

pursuit of the American Dream. Petitioner left money in the drop box at the Valley Green Park office. Security deposit receipt dated **June 18, 2021** for \$1,430.00. Utility transfer acknowledgment dated **July 1, 2021**.

After Petitioner believed all money was paid toward moving in, Wendy Jo Sonnier (she/her) stated that Petitioner was very "trusting" to leave money in an envelope. Sonnier (she/her) then stated an additional \$2,000 commitment fee was required. Petitioner wept. Sonnier (she/her) said she had never seen that much emotion from a man before. Petitioner was given a pro-rated amount less than a full month lease to move in. Petitioner paid **\$902.50** per month, which was structured to accrue up to 18 months of lot rent. Lot rent was separate at **\$600 per month**.

Petitioner paid property taxes for three years without receiving a deed, accruing approximately \$35,000 in equity while all monies were paid only to Valley Green Park.

Financing Misrepresentation and Captive Lender Arrangement

After Petitioner paid all required deposits and believed he had satisfied the conditions for the purchase option, Wendy Jo Sonnier (she/her) represented to Petitioner that he could seek financing for the mobile home "anywhere" or "elsewhere." In reality, Chartwell Financial, LLC (NMLS #205527), a wholly-owned subsidiary of Continental Communities (the parent company of Valley Green Park), was the **only** lender tied to the purchase agreement. This fact was confirmed in a group email involving attorneys Sagstetter and

Sherlock, who stated that Chartwell is the “only” lender. However, Chartwell Financial, LLC is **not licensed in Minnesota** to originate mortgage loans. Its publicly disclosed licenses are limited to Arizona, New Jersey, and Michigan.

Wendy Jo Sonnier (she/her) and Valley Green Park asserted they were selling homes and facilitating financing, yet they retained all moneys paid by Petitioner while there was no licensed lender available under the agreement — only the **perception** of legitimate financing. Petitioner was provided a Loan Estimate from Chartwell Financial, LLC dated December 7, 2022, reflecting an interest rate of 12.125% — not the 8% rate previously represented by Sonnier (she/her). When Petitioner attempted to obtain financing from 21st Mortgage, Valley Green Park confirmed it was “not set up with 21st.” The lower courts prevented Petitioner from presenting evidence of this material misrepresentation through the motion in limine (which removed 140 documents) and the conversion of the motion to dismiss into one for summary judgment.

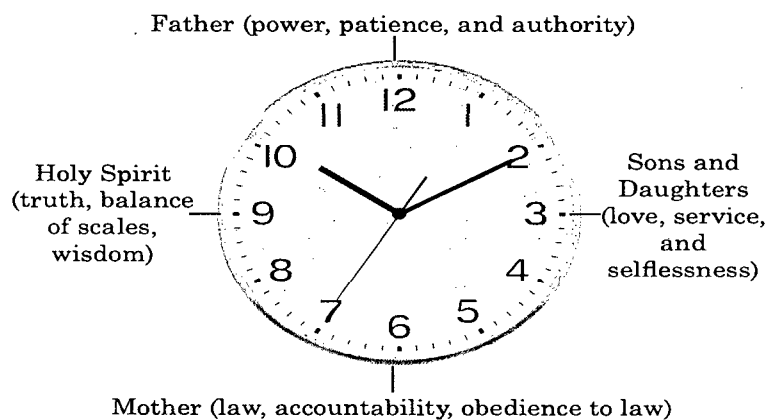
Procedural Obstruction in the Court of Appeals

On May 20, 2025, Petitioner filed a motion to file an informal brief in the Minnesota Court of Appeals (A25-0732), stating that he is not represented by an attorney and does not have the means to file a formal brief. On June 9, 2025, Respondents, through attorney Jacob T. Sherlock, filed a motion to strike Petitioner’s transcript requests from the related eviction proceeding (70-CV-24-12511). On June 20, 2025, the Court of Appeals granted the motion to strike. On July 11, 2025, the Court of Appeals denied

Petitioner's motion to supplement the record with transcripts and filings from the eviction proceeding. These rulings limited Petitioner's ability to present a complete record on appeal.

The Clocks Interpretation (Protected Under the First Amendment)

Petitioner did Sonnier's (she/her) numbers in accordance with the clocks interpretation written in the complaint. The clocks interpretation (see diagram herein) is protected speech and religious expression under the **First Amendment**. It uses an actual clock to identify positive qualities in reference to humanity and places the mother and daughter directly within the Trinity. The 12 represents the father (power, patience, and authority). The 6 represents the mother (law, accountability, obedience to law, and harmony — the GOD quality of family).



The **3 o'clock position** represents **GOD control** representing sons & daughters, love, service, and selflessness is "**Paramount**", with the hound dog's paw all about weighing value towards independence. The 9 o'clock position represents truth and the holy spirit, balance of the scales, wisdom, relationships, communication, gratitude, and liberty, with the hound dog's paw all about love, freedom, selflessness, and service.

This framework requires speaking only positives. The "lisps of the tongues of the angels of men" send positive words in the form of prayer. The clocks interpretation was provided "soul...ly" by a full-time dad of a son and his hound dog Ruby, who stands with Petitioner in this pursuit of truth, independence, and equal access to law enforcement. It is directly tied to equal access to law enforcement and the practical protection of constitutional rights. The lower courts and private pretenders refused to allow the clocks interpretation written in the complaint.

Bible Quotes Supporting Due Process, Justice, and Independence (written in the complaint):

"Justice, and only justice, you shall follow"
(Deuteronomy 16:20); "You shall not oppress a sojourner" (Exodus 23:9); "The truth will set you free" (John 8:32).

Case Study: This case serves as a case study of systemic obstruction of pro se independence in manufactured housing disputes involving private pretenders removing law enforcement and the misconduct of Wendy Jo Sonnier (she/her).

[Condensed chronology with transcript quotes on

only licensed lender Chartwell, obstruction of independence by private pretenders, tax payments without deed, clocks interpretation, family impacts as full-time father, neighbor texts September 18–19, 2024, and direct rebuttals to A25-0732 language, cross-referenced to the filed April 18, 2024 Complaint and March 20, 2024 Affidavit of Service.]

REASONS FOR GRANTING THE PETITION

I. Fourteenth Amendment Due Process Violations: Obstruction of Carmack's Independence by Private Pretenders and Protected Property Interests from Tax Payments Without Deed

The decision below conflicts with this Court's procedural due process precedents. Procedural due process requires meaningful notice and an opportunity to be heard before the deprivation of a protected property interest. *Mathews v. Eldridge*, 424 U.S. 319 (1976). Petitioner paid property taxes for three years without receiving a deed, creating a protected property interest and reliance under state law. *Board of Regents v. Roth*, 408 U.S. 564 (1972). The risk of erroneous deprivation was high. Discovery into core issues — lender cooperation with the only licensed lender tied to the agreement, the discrepancy between the represented 8% financing and actual terms, the option timeline, tax payments without a deed, and retaliatory actions — was denied.

Private landlord conduct became state action when intertwined with judicial enforcement and the removal of law enforcement presence. *Shelley v. Kraemer*, 334 U.S. 1 (1948); *Lugar v. Edmondson Oil*

Co., 457 U.S. 922 (1982). On September 12, 2024, in the 70-CV-24-12511 proceedings, private pretender Jacob Sherlock moved for and obtained relief that effectively authorized the removal of law enforcement from Petitioner's residence after Petitioner had used it for service. This directly obstructed Carmack's independence written in the complaint. The motion in limine removed **140 documents**, including the "tools" for the clocks interpretation written in the complaint. This violated pro se rights to use paper filings as the actual law requires for pro se litigants. The lower courts accepted this removal while denying the clocks interpretation (3 o'clock GOD control and 9 o'clock truth) and evidence of retaliation, including Wendy Jo Sonnier (she/her)'s misconduct.

The intentional removal of law enforcement is what the great "bar" of Minnesota defends. Jacob Sherlock, placed among Minnesota's Rising Stars and recognized in Super Lawyers for both 2025 and 2026, participated in this removal. Such conduct is treated as the cream of the crop in Minnesota.

The language of "with prejudice" or "without prejudice" has **no business** in civil law. It certainly has no place in God's business.

Private pretenders go to law school to learn how to "argue," yet according to the clocks interpretation, the GOD quality of the mother is **harmony**.

II. Equal Protection, Retaliation, First Amendment Clocks Interpretation, and Forfeiture by Private Pretenders

The Court of Appeals' conclusion that Minn. Stat. §

504B.441 creates only a defense rather than an affirmative claim, combined with forfeiture of contract arguments and refusal of the clocks interpretation, denies meaningful remedies and burdens pro se litigants disproportionately.

Boddie v. Connecticut, 401 U.S. 371 (1971); *M.L.B. v. S.L.J.*, 519 U.S. 102 (1996). Evidence in the record and transcripts from September 12, 2024, October 18, 2024, and November 5, 2024 creates genuine issues on retaliation, fraud (Chartwell only licensed lender), and obstruction of independence. Summary judgment standards require viewing facts favorably to the non-movant. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242 (1986). The lower courts did not do so.

III. State Action Through Removal of Law Enforcement by Private Pretenders, Including Interference with Second Amendment Rights

The removal of law enforcement after Petitioner used it for service constitutes state action under the Fourteenth Amendment. Private pretenders obstructed Carmack's independence written in the complaint by seeking and obtaining the removal of law enforcement protection from his residence after knowingly removing law enforcement. When a private party's actions are intertwined with state judicial enforcement of evictions and leases, and the court grants relief that effectively authorizes the removal of law enforcement access, those actions become attributable to the State. *Shelley v. Kraemer*, 334 U.S. 1 (1948); *Lugar v. Edmondson Oil Co.*, 457 U.S. 922 (1982).

In the transcripts of the proceedings held on September 12, 2024, October 18, 2024, and November 5, 2024, and in Petitioner's sworn

affidavit, Petitioner made clear that the removal of law enforcement was against his “independence” as written in the complaint. Petitioner used the Scott County Sheriff’s Office to effect legal civil service. After Petitioner used law enforcement for service, private pretender Jacob Sherlock requested its removal. The Shakopee Police Department, the Jordan Police Department, and any law enforcement Petitioner could have independently chosen were removed or restricted. On or around October 15, 2024, the court instructed Petitioner not to use law enforcement. Petitioner was penalized for using it. This was not mere private conduct but was enabled and ratified by state court proceedings.

This principle is starkly illustrated in *Commonwealth v. O’Malley Nicholas*, where actions taken under color of law stripped away the very core of protection and service. The relinquishment of firearms left Officer O’Malley defenseless — demonstrating how protection apparatuses can be removed at will by unaccountable actors, ultimately leaving the authority to protect resting with a hound dog’s paw.

The Constitution does not allow the removal of protection apparatuses and firearms while waiting for the FBI and DOJ to act — only for those institutions to ultimately bend the knee to Antifa.

President Donald Trump, at 76 years young, was focused on loyalty, tested on obedience to law, passionate about the father in himself, his father upstairs, and passionate about the hound dog’s “paw.” Plaintiff communicated only positives using the clocks interpretation — the same framework that was weaponized in lawfare against President Trump.

There were no negative character communications. "Presidence" is needed, especially when there is no equal opposite of rights to the protection of law enforcement. We the people believe in protection from firearms, but law enforcement is removed without independent choice. Removing law enforcement is removing a believed protection apparatus. Greater access to Second Amendment rights without "designated areas," as the law applies in Minnesota, is required.

The removal of law enforcement access also effectively removed the practical protection granted by firearms under the Second Amendment. Petitioner, as a law-abiding citizen and full-time father, possesses the fundamental right to keep and bear arms for self-defense in the home. *District of Columbia v. Heller*, 554 U.S. 570 (2008); *McDonald v. City of Chicago*, 561 U.S. 742 (2010). When the State (through judicial proceedings) permits or ratifies the removal of law enforcement protection from a citizen's residence, it substantially burdens the ability to exercise that Second Amendment right in a meaningful way. Equal access to the protection of law enforcement is a necessary component of the right to keep and bear arms for self-defense. The motion in limine removed 140 documents, including the "tools" for the clocks interpretation written in the complaint, further preventing Petitioner from presenting evidence of how the removal of law enforcement and the obstruction of his independence undermined both his Fourteenth Amendment rights and his Second Amendment rights.

As the song lyrics state:

"Mama take this badge from me, I can't use it

anymore. Mama put my guns in the ground, I can't shoot them anymore. knock knock knockin' on heavens door. Howww, howww, howww, howww."

In response to matters concerning federal involvement, Jacob Sherlock stated that Pam Bondi had no jurisdiction over law enforcement in Minnesota. This position was taken after the private pretender had already acted to remove law enforcement protection. President Donald Trump subsequently asserted a law enforcement observance week, underscoring the federal interest in equal access to law enforcement and accountability for its removal. Amicus briefs have been prepared requesting the involvement of Pam Bondi to address the jurisdictional and constitutional concerns arising from the removal of law enforcement by private actors in coordination with state proceedings.

As the song lyrics state:

"Sucker punch somebody on a sidewalk, car jackin' an ole' lady at a red light, pull a gun on the owner of a liquor store you think it's cool, let the fool live your life, cuss out a cop and spit in his face, stomp on the flag and light it up yea you think you're tough, try that in a small town, around here we take care of our own, you cross that line it won't take long for you to find out. I recommend you don't try that in a small town."

The lower courts' acceptance of this removal, while denying the clocks interpretation and evidence of retaliation, deprived Petitioner of equal protection in access to law enforcement services available to others and substantially burdened his Second Amendment

rights.

IV. Policy and Constitutional Imperatives

Petitioner asserts his rights as a full-time father, a law-abiding citizen, and a pro se litigant who stands on truth, the clocks interpretation, and the full exercise of constitutional rights — including equal access to law enforcement and the practical protection of the Second Amendment — without being forced into designated areas or stripped of meaningful remedies. The lower courts' rulings effectively punished Petitioner for asserting his independence and for communicating only positives through the *clocks interpretation*, the same framework previously weaponized in lawfare against President Trump at 76 years young.

CONCLUSION

The petition for a writ of certiorari should be granted.

Wendy Jo Sonnier (she/her) engaged in conduct including obstruction of power in sight of Carmack's trust. Petitioner stands on truth, independence, and equal access to law enforcement.

According to the *clocks interpretation*, the very Constitution itself was signed amid immense opposition by an avatar of freedom, who was passionate about truth and fairness, focused on "independence" and liberty. According to the clocks interpretation, **"truth" is paramount to Pam Bondi**, and she is passionate about America's independence and liberty, for which we have a Statue of Liberty upholding the flame of liberty through the

day and through the night — the same liberty written in the complaint.

The reality of the Plaintiff's American Flag not being present in the court proceedings makes clear that the Pledge of Allegiance functions as a **prayer for obedience to law.**

I pledge allegiance to the Flag of the United States of America, and to the Republic for which it stands, one Nation under God, indivisible, with liberty and justice for all.

As (45-47) stated:

"The more people tell you it's not possible, that it can't be done, the more you should be absolutely determined to prove them wrong. Treat the word impossible as nothing more than motivation. Relish the opportunity to be an outsider. Embrace that label. Being an outsider is fine, embrace that label. Because it is the outsiders who change the world, and make a real and lasting difference. The more a broken system tells you that you are wrong the more certain you should be, you must keep pushing ahead, you must keep pushing forward."

The "numbers" are great America.

Respectfully submitted,

/s/ Willis Jonathon David Carmack

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Ruby