

No. 26-5040

IN THE
SUPREME COURT OF THE UNITED STATES

ANDREW W. BELL,
Petitioner,

v.

STATE OF GEORGIA,
Respondent.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE SUPREME COURT OF GEORGIA

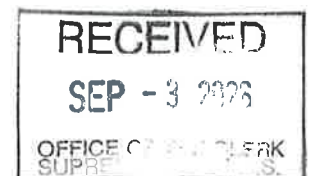
**PETITIONER'S SUPPLEMENTAL BRIEF PURSUANT TO RULE 15.8
REGARDING INTERVENING MATTERS AFTER AUGUST 10, 2026**

Petitioner Andrew W. Bell respectfully submits this Supplemental Brief pursuant to Supreme Court Rule 15.8.

Petitioner's previous supplemental filing was made on August 10, 2026. This brief is restricted to material developments occurring after that filing or otherwise unavailable at that time.

Petitioner does not seek to add a Question Presented.

I. THE AUGUST 13, 2026 JURY TRIAL HAS OCCURRED



On August 13, 2026, the State Court of DeKalb County proceeded to a completed jury trial in Case No. 22C03994.

Petitioner represented himself.

The jury returned guilty verdicts.

The occurrence of the trial eliminates any request in Petitioner's prior filings whose sole purpose was to prevent the August 13 proceeding.

Petitioner therefore withdraws as moot any request for prospective relief directed solely toward stopping that trial.

Petitioner does not ask this Court through Rule 15.8 to adjudicate independent evidentiary, jury-charge, compulsory-process, sufficiency, or other alleged errors arising during the trial.

II. PETITIONER HAS INVOKED GEORGIA'S POST-TRIAL PROCEDURES

On August 14, 2026, Petitioner filed a Motion for New Trial.

On August 25, 2026, Petitioner filed a First Amended Motion for New Trial.

The First Amended Motion expressly preserves, among other matters, the unresolved controversy concerning the March 11, 2025 self-representation proceeding and completeness of the transcript.

The March 11 dispute itself is **not presented as new matter under Rule 15.8**.

The intervening matter is that, following Petitioner's August 13 conviction, the Faretta/transcript issue has now been expressly incorporated into the post-trial record as a ground requiring resolution before final disposition of the Motion for New Trial and transmission of an appellate record.

Petitioner therefore acknowledges that Georgia's post-trial process now provides an avenue through which trial-level claims may be adjudicated and, if necessary, reviewed on direct appeal.

Petitioner no longer contends that no state avenue of review whatsoever exists.

III. THE AUGUST 17, 2026 A27O0007 ORDER IDENTIFIED THE SUPERIOR-COURT MANDAMUS PROCEDURE

On August 17, 2026, the Court of Appeals of Georgia entered an order in *Bell v. Judge Kimberly K. Anderson*, Case No. A27O0007.

That proceeding was a separate original mandamus petition filed directly in the Court of Appeals.

The Court of Appeals held that its original mandamus jurisdiction is limited under *Arnold v. Alexander*, 321 Ga. 330, 914 S.E.2d 311 (2025), and stated that the ordinarily applicable procedure is first to seek mandamus in superior court and thereafter appeal any adverse disposition.

The court concluded that Petitioner's remedy, "if any," lies in superior court.

Petitioner timely sought reconsideration of that decision, including correction of the order's statement that the trial court had failed to sign a "proposed order."

Petitioner maintains that he filed a Motion for Certificate of Immediate Review but did not draft or submit a separate proposed certification order.

Regardless of the disposition of reconsideration, Petitioner recognizes the newly stated superior-court procedure and is pursuing the appropriate trial-court and superior-court sequence for any still-live mandamus issue.

IV. A POST-TRIAL TRANSCRIPT-CORRECTION HEARING IS NOW DUE

Before the August 13 trial, the State Court entered an order stating that it would conduct an evidentiary hearing **post-trial** concerning Petitioner's Motion to Correct the March 11, 2025 transcript.

The trial has now concluded.

On August 19, 2026, the Clerk of the State Court issued notice of a motions hearing scheduled for September 15, 2026.

Petitioner is requesting that the State Court confirm that the September 15 hearing will include the evidentiary proceeding required to resolve the disputed transcript.

Again, the underlying March 11 transcript controversy is not offered as newly discovered matter. The intervening developments are the completion of trial, the triggering of the court's previously announced "post-trial" hearing posture, and the September 15 hearing notice.

V. THE INTERVENING DEVELOPMENTS NARROW THE PRESENT PROCEDURAL POSTURE

These post-August 10 events substantially alter the prospective posture described in Petitioner's earlier filings.

Petitioner has now been tried and convicted, has invoked the Motion-for-New-Trial process, has obtained a new appellate decision identifying superior court as the ordinary mandamus forum, and has received notice of a September 15 post-trial motions hearing.

Petitioner submits these events so that the Court considers the pending Petition upon the current record.

Petitioner does not use them to enlarge the four Questions Presented.

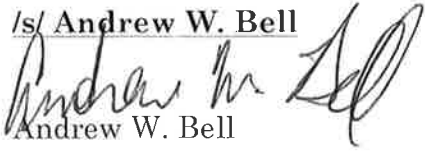
CONCLUSION

Petitioner respectfully requests that the Court take notice of the foregoing intervening matters pursuant to Rule 15.8 and consider them only insofar as they bear upon the Questions already presented in No. 26-5040.

Petitioner expressly withdraws any request whose sole purpose was preventing the August 13, 2026 trial.

Respectfully submitted this 27th day of August, 2026.

/s/ Andrew W. Bell

A handwritten signature in black ink, appearing to read "Andrew W. Bell", written over the printed name.

Andrew W. Bell
Petitioner Pro Se

PROOF OF SERVICE

I, Andrew W. Bell, certify that on August 27, 2026, I served a true and correct copy of the foregoing **Petitioner Andrew W. Bell respectfully submits this Supplemental Brief pursuant to Supreme Court Rule 15.8.** upon counsel for Respondent by first-class United States mail, postage prepaid, or another method permitted by Supreme Court Rule 29.

Office of the Attorney General of Georgia

40 Capitol Square, S.W.

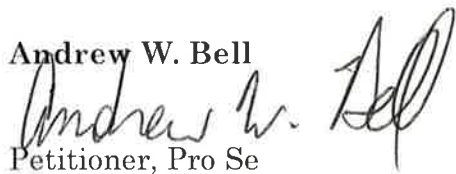
Atlanta, Georgia 30334

and upon counsel of record for Respondent, if different.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 27, 2026.

Andrew W. Bell



Petitioner, Pro Se

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