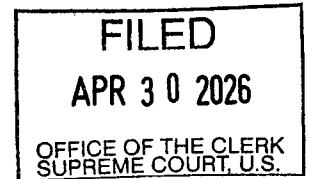


ORIGINAL

No. 26-5246

**In The
Supreme Court of the United States
October Term 2026**



**John Wesley Patton,
Petitioner,**

Vs.

**Gary Westcott, Secretary Louisiana Department of Corrections,
DPSC, and Travis Day, Warden BB Sixty Rayburn Corr. Cte.
Respondents,**

**On Petition of Writ of Certiorari
Louisiana Supreme Court No. 2025-KH-1003
State Post Conviction Review
28 U.S.C. 1257(a)**

**Petition for Writ of Certiorari
United States Supreme Court**

**John Wesley Patton, Esq.
Pro-Se Petitioner
DPSC No. 327902
BB. Sixty Rayburn Correctional
27268 Hwy 21 North
Angie, Louisiana 70426**

(a)
Questions Presented for Review

State Post-Conviction Procedural Questions:

Question Number One

Are the following State Post Conviction grounds not “enumerated” grounds for relief as the Louisiana Supreme Court ruled? Even though the Petitioner specifically assigned valid Louisiana State and United States Constitutional violations on each claim 1 through 30 in the original post conviction claims, that the State of Louisiana claims are not enumerated? The Petitioner states that Louisiana post conviction claim numbers; **Six, Ten, Eleven, Fourteen, Eighteen, Twenty-One, Twenty-Six, Twenty-Seven, Twenty-Nine**, are in fact valid constitutional violations and are valid.
(Appendix “D”).

Are these Grounds mentioned above cognizable for State post conviction?

Did the Louisiana Court’s in fact err in their rulings?
(Appendix “D”).

Question Number Two

Are Petitioner’s State Post Conviction Claims **Four, Five, Eight, Nine, Twelve, Thirteen, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Nineteen, Twenty-Three, Twenty-Eight**, in fact “procedurally barred” as the Louisiana Supreme Court affirmed?
(Appendix “D”).

a. If so? Is that Louisiana “procedurally bar” overcome by the Petitioner’s repeated claims of “actual innocence?” See Supreme Court Number **24-5079. Patton V. Louisiana**, 145 S. Ct. 301. In which Petitioner maintained his “actual innocence” on direct appeal.

b. Did the Louisiana Supreme Court err in “retroactively” applying harsher new post conviction standards? As Petitioner was entitled to hearings on procedurally barred claims (**LSA Crim.C.Pro. Art. 930.4(F)**) at time of Petitioner’s original arrest in 2018. Louisiana Courts applied new laws passed in 2024 and 2025 to Petitioner’s pending post conviction claims. That banned 930.4(F). Was that a Constitutional violation?

Question Number Three

Could any Pro-Se Petitioner ever expect to meet the heavy burden of **LSA Crim.C.Pro. Art. 930.2? (Burden of Proof)**.

a. When Louisiana District Judges refuse to give Pro-Se Defendants any courtroom records, transcripts of the pre-hearings, trial, motion for new trial? To prove their claims?

b. When Louisiana District Judges flat out refuse to hold any “pro-se” evidentiary hearings? Or expand the record?

c. Without those transcripts or hearings, can Louisiana claim the Petitioner is now “fully litigated?”

Did the Louisiana Supreme Court err when it did not remand the Petitioner’s post conviction back to the 24th Judicial District Court for “evidentiary hearings” on claims One(A)(B)(C), Two, Four, Seven, Twenty-Two, and Thirty? (**Appendix “D”**).

Question Number Four

Is Louisiana’s retroactive application of it’s new harsher post conviction laws upon it’s citizens a clear violation of the United States Constitution prohibition in **U.S.C.A Const. Art. 1 § 9?**

a. Which post conviction laws apply to the Petitioner? 2018? Or 2024? Date of arrest? Date of filing?

Question Number Five

If the “right to defend” is personal and a Louisiana Citizen’s choice in exercising that right must be honored out of that respect for the individual, which is the “lifeblood” of the law? **McCoy V. Louisiana**, 138 S.Ct. 1500, (2018). Then why is Louisiana “rubberstamping” all pro-se direct and post conviction appeals without meaningful review, hearings or “due process?” (**Appendix’s “A” & “B”**).

a. Did rubberstamping the Petitioner’s post-conviction in direct violation of both State and Federal Constitutions offend “Due Process?”

b. Is rubberstamping a State Post Conviction considered “Fully Litigated?”

State Post Conviction Claim Questions Claims 1 - 30

Question Number Six

Did the Petitioner meet the prongs in Strickland when the Petitioner’s first attorney, Courtney John Wilson sent a lying letter with the clear intent to interfere with Petitioner’s new counsel claiming the Petitioner was crazy and was unable to defend himself? And that letter was designed to interfere with new counsel’s perception of the Petitioner ability to defend himself Pro-Se? (**original post conviction claim one**) (**A**). (**Appendix “D”**).

Did the Petitioner in fact, meet the prongs in Strickland when the Petitioner’s second attorney, Martin E. Regan, Jr, failed to refund any of the original \$10,000-dollar retainer fee? Thereby setting the Petitioner’s pro-se representation into motion? As Petitioner had no more funds to hire Counsel. (**original post conviction claim one**) (**B**). (**Appendix “D”**).

Should the Petitioner have been afforded post conviction “evidentiary hearings” on his claims of ineffective assistance of counsel in pre-trial?

Did the Petitioner in fact waive his “right to effective assistance of counsel” in pre-trial as Louisiana Court’s claimed? When the Petitioner exercised his right to proceed pro-se?

Question Number Seven

Was a one error "direct appeal" brief considered effective assistance of counsel on appeal by Louisiana Appellate counsel? Even when the Petitioner repeatedly informed the attorney of numerous errors contained in the record? And the Petitioner's Louisiana 50-year sentence amounted to "life in prison" based on the Petitioner's age? **(original post conviction claim two). (Appendix "D").**

Question Number Eight

Was the Petitioner entitled to effective assistance by "Stand by Counsel?"

a. If so? What are Stand by Counsel's Parameters of help? No court has ever set exactly what is required of Stand by Counsel? To be effective? Or what is ineffective? This question was never answered by 24th Judicial District Judge when asked by Petitioner? And Petitioner found no case law?

Was a complete failure of "standby counsel" to assist the Petitioner in finding witnesses, documents needed to prove his innocence in fact a "due process claim" or an "ineffective assistance claim"? **(original post conviction claim three). (Appendix "D").**

Question Number Nine

Was the Petitioner's "right to present a defense" severely interfered with, due to the 24th Judicial District Judge, Steven C. Grefer dislike for pro-se defendant's and alleged sex offenders? When the Judge used every available means to completely restrict by **(evidentiary rulings)** the Petitioner's defense? Completely restricting numerous documents, witness testimony that was imperative for the Louisiana Jury to fully understand the events of September 07& 08, 2018.

a. Did those rulings violate **Faretta V. California, 95 S.Ct. 2525, (1975)?** Since the Petitioner was acting Pro-se? And the blocking of those important issues amounted to a false conviction of crimes that never occurred? **(original post conviction claim four). (Appendix "D").**

Question Number Ten

Did the Petitioner receive a Fair Trial as guaranteed by the United States Constitution when all the Louisiana public to include his friends and family were required to view the trial in Division "P" down the hall? With the camera facing forward to keep the public and family from witnessing the courtroom corruption? **(original post conviction claim five). (Appendix "D").**

Question Number Eleven

Did the Petitioner receive a Fair Trial guaranteed by the United States Constitution due to the cumulative effects of all the Due Process violations by 24th Judicial District Judge, Steven C. Grefer? **(original post conviction claim six). (Appendix "D").**

Question Number Twelve

Was Brady violated by the Louisiana District Attorney's? Should the Petitioner been afforded a hearing on his State Post Conviction to expand the record? Did that violate Due Process? **(original post conviction claim seven). (Appendix "D").**

Question Number Thirteen

Did the State of Louisiana meet the "beyond a reasonable doubt" or the "elements" of the sex crimes, when Louisiana Law requires Rape element of "the slightest touch" and no DNA was found? And the evidence presented was not sufficient for any rational trier of fact to find the essential elements necessary to support the Petitioner's Louisiana sex crime convictions? In fact, no rational trier of fact concluded beyond a reasonable doubt the Petitioner committed the crimes.

Without DNA how did the State of Louisiana meet the elements of Rape, Sexual Battery? **(original post conviction claim eight). (Appendix "D").**

Question Number Fourteen

Did the introduction of fabricated “propensity evidence” sexual misconduct, drugs and porn violate the Petitioner’s United States Constitution rights? When Louisiana jury believed the false evidence, the Petitioner rights to impeach that false evidence was restricted by the presiding judge?

Did the State of Louisiana violate “equal justice under law” when it refused to hear the Petitioner’s **La.C.Ev. 404(B)** claims? On fabricated allegations of other sexual propensity?

Should that allegations of a 2016 Attempted Rape have been given a separate trial due to the confusion of the facts to the Louisiana Jury?
(original post conviction claims nine, fifteen and sixteen). (Appendix “D”).

Question Number Fifteen

Could a Prisoner’s sentences have been considered “cruel and inhumane” based on his prison living conditions?
(original post conviction claim ten). (Appendix “D”).

Question Number Sixteen

Did the culmination of all the State of Louisiana legal trickery and fraud in multiple hearings create a very improvable chance the Petitioner would receive a Fair Trial as guaranteed in the United States Constitution?
(original post conviction claim eleven). (Appendix “D”).

Question Number Seventeen

Did the Petitioner overcome the **Stone V. Powell**, 96 S. Ct. 3037 (1976), exception when the State of Louisiana offered no opportunity for “full and fair ligation” on multiple Forth Amendment violations by Louisiana police?
(original post conviction claim twelve). (Appendix “D”).

Question Number Eighteen

Should 24th Judicial District Judge, Steven C. Grefer have ordered the testing of the evidence for the residue of CS Gas (**Sua Sponte**) of all evidence seized out of the Petitioner's 1308 Central avenue residence, after the Petitioner "repeatedly", explained to the judge, filed motion after motion, that the evidence seized was in fact, not in the 1308 Central Avenue, apartment at the time, Westwego police breached the Petitioner's residence with CS gas canisters, covering everything with CS gas residue. But, was in fact planted by the two police officer's who were in fact "friends" with the complaining witness? The Evidence was clearly planted to secure a false conviction? And testing of that evidence would prove the Petitioner was in fact "telling the truth"? No rape ever occurred in that apartment.

Did the State of Louisiana violate the Petitioner's Constitutional Rights when the 24th Judicial District Judge, Steven C. Grefer should have granted the Petitioner's postconviction claim pursuant to **Louisiana Code of Criminal Procedure, Article 926.3** "Motion for testing of evidence" and ordered an "contradictory hearing" **Sua Sponte**? After the Petitioner repeatedly explained to the bias judge that "no incriminating" evidence was in the 1308 Central apartment on September 07, 2018, but was PLANTED by Westwego Police in clear efforts to frame the Petitioner for sex crimes? And that testing would prove that fact?

No CS Gas residue is on the planted evidence!
(original post conviction claim thirteen). (Appendix "D").

Question Number Nineteen

Were the Petitioner's United States Constitutional Rights violated when two Louisiana police detectives sought out perjury for Petitioner's ex dating partners whom the Petitioner had prior relationship problems with? The two detectives convinced the woman to fabricated other false facts? Was that "Suborned Perjury?" When the fabrications were used against the Petitioner in Trial? To make him look bad in front of the Louisiana Jury?

Did that create an unfair trial?
(original post conviction claim fourteen). (Appendix "D").

Question Number Twenty

Did the creation of a false standoff? Taint the Petitioner's trial?

When the police in fact, create a "fabricated standoff" does that in its self violate the Petitioner's United States Constitutional Rights?

Can Louisiana Police not "knock and announce" and then call it a "standoff?" **(original post conviction claim seventeen). (Appendix "D").**

Question Number Twenty-One

When Louisiana Police create "fake news stories" not based on a shred of real evidence? Dose that violate the Petitioner's United States Constitutional Right to a fair trial?

When in fact, those very same stories were on every news station in the New Orleans viewing area?

The same area the Petitioner picked his Jury pool from? **(original post conviction claim eighteen). (Appendix "D").**

Question Number Twenty-Two

Did the State of Louisiana actually prove the Petitioner committed the alleged fabricated Rape and Sexual Battery when one of the main elements was never met? There was no DNA and with no DNA there could have been no Rape or Sexual Battery? As Louisiana Rape requires the "Slightest Touch" and if no DNA was recovered from the alleged victim? Then how did the State of Louisiana prove the elements of the crime? **(original post conviction claim nineteen). (Appendix "D").**

Question Number Twenty-Three

Is it a violation of the Petitioner's United States Constitutional Rights to be framed by Louisiana Police? Does the use of "undue influence" violate the Petitioner's Constitutional Rights?

What constitutes the above violations?
(original post conviction claim twenty). (Appendix "D").

Question Number Twenty-Four

Are Louisiana prison offender counsel's required to render "effective assistance" on their appeals, writs and other pleadings filed on behalf of prisoner's? Is there any remedy of law if they don't?

Is the Louisiana prison rule that "forbids" other prisoner's from assisting the Petitioner actually a violation of **Johnson V. Avery**, 89 S.Ct. 747 (1969)?
(original post conviction claim twenty-one). (Appendix "D").

Question Number Twenty-Five

Should the State of Louisiana be providing the very "transcripts" to the Petitioner that will provide the burden the Petitioner needs to overcome in LAS Crim.C.Pro. 930.2?

Is the Petitioner entitled to those "transcripts" free of charge if he is indigent?
(original post conviction claim twenty-two). (Appendix "D").

Question Number Twenty-Six

Is the State of Louisiana actually violating "Multiplicity" when it charged the Petitioner with multiple fabricated sex crimes and other fabricated crimes using one "simple battery" incident?

And Louisiana ADA's are in fact charging it citizens with multiple crimes arising out of one incident?

Does Louisiana actions in fact violate the United States Constitution, Fifth Amendment protection against "Double Jeopardy?"
(original post conviction claim twenty-three). (Appendix "D").

Question Number Twenty-Seven

Is the Louisiana “one witness” rule actually legal, just and Constitutional, as it convicted the Petitioner by “witness testimony” not corroborated by any physical evidence?

Can one lying witness point the finger at a Louisiana Citizen “say he did it” without any evidence other than he said, she said and send a Louisiana Citizen the prison for life and that be Constitutional?

Is it a violation of the “privileges and immunities” clause when other States deem the “one witness” Rule in violation of the Constitution? And Louisiana deems it Constitutional?

(original post conviction claim twenty-four). (Appendix “D”).

Question Number Twenty-Eight

Did the emergence of Covid 19 right in the middle of the Petitioner’s trial preparation make it virtually impossible for the Petitioner to receive a “Fair Trial” as guaranteed by the United States Constitution?

Should the Petitioner receive a “new” Fair Trial? Based on Covid interference?
(original post conviction claim twenty-five). (Appendix “D”).

Question Number Twenty-Nine

Has Louisiana weaponized law fare in Louisiana by it’s illegal actions in it’s courtrooms state wide? In clear efforts to secure convictions by any means necessary, even if it means lying to the jury?

When multiple innocent citizens are in fact being sent to prison by those very unethical actions by Louisiana District Attorney’s representing the State of Louisiana?

Is the truth not important anymore as Louisiana seeks to secure convictions at any costs?

(original post conviction claim twenty-six). (Appendix “D”).

Question Number Thirty

Can the prison officials violate the Petitioner's civil rights to a level that rises to Cruel and Unusual Punishment in violation of the Eight Amendment?

Will that overturn a State conviction?
(original post conviction claim twenty-seven). (Appendix "D").

Question Number Thirty-One

Was it a violation of the United States Constitution when the Petitioner's original jury charge never explained Reasonable-Doubt to a Louisiana Jury?

There was Reasonable -Doubt to believe that the Petitioner NEVER committed Rape, Sexual Battery or Attempted Rape but, the Louisiana Judge refused to explain that charge to a jury. Was that a Constitutional violation?

Should the Louisiana Jury been charged to have heard the Petitioner's "Involuntary Intoxication" defense? (Simple Battery). Or his "Testosterone Rage" defense? (Simple Battery). When there was ample evidence of both defenses? On the fight that occurred in the Petitioner's living room that lead to the false claims of rape.
(original post conviction claim twenty-eight). (Appendix "D").

Question Number Thirty-Two

Would the planting of listening devises in the Attorney-Client visitation room violate the United States Constitution?

Is the Assistant District attorney knowing what was said in multiple conversations, between the Petitioner and his Attorney's actual proof? And the Federal Bureau of Investigation believing it as so, actual proof that Jefferson Parish is in fact doing it to it's citizens to gain an "advantage" over its citizens? Proof?
(original post conviction claim twenty-nine). (Appendix "D").

Question Number Thirty-Three

Did a prior 42 U.S.C.A. 1983, 1985, Civil Action Lawsuit entitled **John Wesley Patton V. City of Westwego**, 2022 WL 3754192 naming 24th Judicial District Judge, Steven C. Grefer, as a “Defendant” make it impossible for the Petitioner to have a “Fair and Impartial” State Postconviction review by Judge Grefer?

Was it clear by the Judge’s ridiculous rulings, lack of any “evidentiary hearings” or complete refusal to hear the merits of the Petitioner’s thirty claims a “Prima Facie” case for recusal pursuant to “retaliation” by a sitting judge?
(original post conviction claim thirty). (Appendix “D”).

(b)(i)

List of Parties

Petitioner's

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Sleet 2

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Respondent's

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(b)(ii)
Proceedings

On the 4th Day of October 2024 the Petitioner filed a “Application for Post Conviction Relief” pursuant to LSA C.Cr.P. Art 930.3. **(Appendix “D”)**. Along with the original application the Petitioner filed a “Motion to Recuse” 24th Judicial District Judge, Steven C. Grefer from hearing the application. **(See Appendix “C”)**. **(Interlocutory appeal number 1)**. The Petitioner used the grounds that Judge Grefer was not “fair nor impartial” as required by both the Louisiana and United States Constitutions. Over a Federal Lawsuit the Petitioner had filed. And that a number of the post conviction claims were in regard to Judge Grefer himself. The Petitioner felt that the Judge should not hear his claims. The Petitioner included as exhibits proof that the Petitioner had indeed previously filed that Federal Lawsuit directly against the Judge. Naming him personally as one of the defendants. The Judge denied the recusal motion on the 17th day of December 2024.

The Petitioner sought supervisory writs to the 5th circuit court of appeals in Gretna, in which the 5th circuit court of appeals issued an opinion on February 25, 2025. **25-KH-48**,

The Petitioner sought supervisory writs on that denial to the Louisiana Supreme Court. No. **2025 KH 0359**. That writ was denied by this court US S.Ct. No. 25-6506.

The Judge issued a ruling for the State of Louisiana to answer the post conviction. **(Appendix “E”)**.

Judge Grefer continued the illegal rule on the Petitioner’s merits even after the Petitioner repeatedly requested stays of any rulings while and until the Petitioner appealed the recusal the to Supreme Court of United States of America in Washington, DC. And while the Petitioner attempted to catch up to the fast moving post conviction rulings by 24th Judicial District Judge, Steven C. Grefer who was clearly biased. The Stay motion was denied by the Louisiana 5th Court of Appeals court on the 13th day of May, 2025. Number **25-KM-206**. **(Appendix “J”)**.

On the 04th day of February, 2025, the petitioner's request for transcripts motion and his in forma pauperis were denied by the Honorable Stephen Grefer. Along with an ongoing battle to obtain the transcripts of numerous hearings and trial, in which the Petitioner had to have to meet the burden of 930.2. (See 2025 KH 0152), (2025 KH 1186), (Interlocutory appeal number 2), currently pending in this Court. (see S.Ct. No. ???). (still pending). **Appendixes "F" & "G"**.

On 21st day of March, 2025 the state filed its procedural objections. (**Appendix "K"**). The Petitioner read the State answer. Found it to be high illegal and very inappropriate The Petitioner filed a complaint with the State Bar of Louisiana, Office of Disciplinary Counsel against Jefferson Parish ADA, Darren Allemand. (**Appendix "Q"**). At the time, Petitioner was in process of typing a reply brief to traverse the answer. When the Petitioner received an April 07, 2025 denial of the Petitioner's original application for post conviction, which basically adopted the state's procedural objections word for word. (**Appendix "O"**). The Petitioner than filed a "notice to seek writs." (**Appendix "P"**) In regard to the denial of the post conviction. And a "motion to set the return date. (**Appendix "P"**) That date was set at June 27, 2025. In the mean time the Petitioner had already mailed two "Petitioner's "memorandums in support of claims 1-3 and 4-8. (**Appendix "H"**) and (**Appendix "M"**). **It should be noted Claims 8-30 are not abandoned.** The Petitioner was unable to finish the "memorandums in support." Due to the fast pace of the Judge's rejection of the Petitioner's post conviction.

On the 13th of May, 2025 the Petitioner's "motion to stay" was denied by this honorable 5th Circuit number 2025 KM 206. (**Appendix "J"**). Petitioner has included several other "**Appendixes**" for the court's viewing. 1. The original Petitioner's request for "evidentiary hearings" And "appointment of counsel", those requests were denied. (**Appendix "I" & Appendix "N"**). 2. The Petitioner's original "direct appeal." (S. Ct. La), (**Appendix "S"**) As the State mentioned it several times in their answer that the Petitioner had already briefed certain claims. And therefore those claims were "procedurally barred." That statement is untrue and was (**a misleading statement**). (**Appendix "S"**). 3. Petitioner's original request for "transcripts." To meet the post conviction burden in 930.2. And the denial of said motion. (**Appendix "F"**). 4. Petitioner's repeated attempts to gain a "evidentiary hearings" and those "motions." And denials. (**Appendix "I"**), and (**Appendix "N"**).

On July 07, 2025 less that a month after the Petitioner filed a writ with the Fifth Circuit Court of Appeals, the Petitioner received a ruling denying the writ. (STATE POST CONVICTION). (**25-KH-270**) The Fifth Circuit never reviewed the case on the merits. (**Appendix "B"**). On February 12, 2026 the Louisiana Supreme Court denied the Petitioner's post conviction "writ of certiorari (**Appendix "A"**).

The Petitioner now request "supervisory jurisdiction." An issuance of a writ of certiorari. Pursuant to **28 U.S.C. 1257(a)**. Or at the very least this honorable court intervenes and grants plenary review.

(c)
Table of Contents

Cover Page.....	i
Questions presented to the Supreme Court for review.....	ii-xiii
List of Parties.....	xiv
Proceedings.....	xv-xvii
Table of Contents.....	xviii
Index of Appendices.....	xix-xx
Table of Authorities Cited.....	xxi-xxiii
Opinions Below.....	1
Supreme Court's Jurisdiction.....	2
Statement of the Facts Petitioner's Claims.....	Appendix "T"
Statement of the Louisiana Case.....	3 - 8
Reasons for Granting the Writ.....	9 - 11
Arguments Amplifying Reasons for Writ.....	12 - 15
Conclusion.....	16
Verification Sworn Affidavit, 28 U.S.C.A. 1746.....	17
Affidavit of Fact.....	Included
Proof of Service.....	Included
Appendix's A – T	Included

Index to Appendices

Appendix "A" The Louisiana Supreme Court Brief and Louisiana Supreme Court judgement rendered on **2025 KH 1003** the Petitioner asks this court to review. **(44 Pages)**.

Appendix "B" The Louisiana State 5th Circuit Brief and the opinion denying the Petitioner relief. **2025 KH 00270**. The decision/opinion the Petitioner requested the Louisiana Supreme Court to review. **(45 Pages)**.

Appendix "C" The original Motion to Recuse, 24th Judicial District Judge, Steven C. Grefer, from hearing the Petitioner's State Post Conviction and the Judge's order denying that motion. **(9 Pages)**. **(1st interlocutory writ US S. Ct number 25-6506)**.

Appendix "D" The Petitioner's original State Post Conviction containing thirty (30) claims. **(32 Pages)**

Appendix "E" The original Judge's order for the State of Louisiana to answer the post conviction claims. **(1 Page)**.

Appendix "F" The original Petitioner's request for production of transcripts to prove the State post conviction. **(23Pages)**.

Appendix "G" The 24th Judicial District Judge, Steven C. Grefer original order denying the request. **(Note the Judge outright lies and states no postconviction application is filed)**. **(2nd interlocutory writ US S. Ct number???)**. **(still pending)**.

Appendix "H" The Petitioner's original "Memorandum in Support" of Petitioner's State post conviction claims 1-3. (IAC claims) **(175 Pages)**.

Appendix "I" Denial of Petitioner's request for "evidentiary hearing." **(1 Page)**.

Appendix “J” The original “stay” the Petitioner requested to catch up on “memorandums of claims.” And pursue further writs. **(9Pages)**

Appendix “K” The State of Louisiana answer to the Petitioner’s post conviction. (filed by ADA Allemand). **(84 Pages)**.

Appendix “L” Petitioner’s first extension requested to traverse the answer. (never heard or ruled on by Judge). **(4 Pages)**.

Appendix “M” 2nd Memorandum in Support of Petitioner’s State post conviction claims 4-8. **(57 Pages)**

Appendix “N” Denial of Petitioner’s request for counsel to help prove claims. **(1 Page)**.

Appendix “O” 24th Judicial District Judge, Steven C. Grefer’s denial of the Petitioner’s thirty claim post conviction. **(6 Pages)**. **(notice claim thirteen (13) heading is missing)**. That was done intentionally by a very corrupt judge. That claim was “testing of the planted evidence.”

Appendix “P” Petitioner’s notice to seek writs” and motion to set a return date for those writs. **(6 Pages)**.

Appendix “Q” A Louisiana State Bar complaint to “Office of Disciplinary Counsel that the Petitioner filed in response to the States post conviction answer filled with misstatements of law and fact. **(10 Pages)**.

Appendix “R” Case Management Review; **State of Louisiana V. John Wesley Patton**, criminal case number 18-7474. Honorable Steven C. Grefer presenting “Division “J” 24th Judicial District Court, Jefferson Parish, Louisiana. **(26 Pages)**.

Appendix “S” Louisiana Supreme Court brief on Petitioner’s “Direct Appeal” **(32 Pages)**.

Appendix “T” Statement of Facts. Petitioner’s version of events. **(41 Pages)**.

(c)(i)
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Brown V. Louisiana , 598 U.S. ___, ___ (2023)	10
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Connick V. Thompson , 131 S. Ct. 1350 (2011)	8
Faretta V. California , 95 S.Ct. 2525, (1975)	vi
Giglio V. United States 405 U.S. 150, 153-54, 92 S.Ct. 736, (1972)	13
Grady V. North Carolina , 575 U.S. 306, (2015)	12
Johnson V. Avery , 89 S.Ct. 747 (1969)	x
John Wesley Patton V. City of Westwego , 2022 WL 3754192	xiii
Lawrence V. Florida , 549 U.S. 327 334 (2007)	12
McCoy V. Louisiana , 138 S.Ct. 1500, (2018)	iv
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John W. Patton V. Louisiana , 355 So. 3d 156 (2022) La	ii

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LSA Crim.C.Pro. Art. 930.2	iii, x
LSA Crim.C.Pro. Art. 930.3	viii
LSA Crim.C.Pro. Art. 930.4(F)	iii
LSA Code of Evidence 404(B)	vii

Federal Statutes

U.S.C.A Const. Art. 1 §	iii
28 U.S.C. 1257(a)	2, 16
U.S.C.A. Const. Amendment 5	13
U.S.C.A. Const. Amendment 14	13, 14

**In The
Supreme Court of the United States**

October Term 2026

Petition for Writ of Certiorari

Petitioner respectfully prays that a writ of certiorari issues to review the judgement below.

Opinions Below

**John Wesley Patton V. Gary Westcott, DPSC Secretary, Warden Travis Day,
BB Sixty Rayburn Correctional Center No. 2025-KH-0270, 2025 WL 1863105
(La.App.5 Cir 07/07/25).
Appears as Appendix “B”.**

**John Wesley Patton V. Gary Westcott, DPSC Secretary, Warden Travis Day,
BB Sixty Rayburn Correctional Center No. 2025-KH-1003, 2026WL 395398
(Mem) (La 02/12/26).
Appears as Appendix “A”.**

Jurisdiction

The Date the Highest State Court decided my case was February 12, 2026.

A copy of that decision appears at **Appendix "A"**.

A rehearing was not sought.

The jurisdiction of this Court is invoked under **28 U.S.C. 1257(a)**

Statement of the Louisiana Case

A tragic fight happened on September 07, 2018 in the living room of the Petitioner. Based on that fight the Petitioner was charged with three (3) fabricated crimes, Rape, Sexual battery, and False imprisonment. It was the commination of years of planning by the women who the Petitioner had reported for crimes against the State and Federal governments. It was retaliation from the Petitioner's repeated complaints to State and Federal agencies against the two lying States witnesses, Rachelle C. Dutreix and Christine M. Rorabaugh. The Petitioner was drugged the night of the fight. The women knew each other. Unbeknownst, to the Petitioner the woman had been filing numerous false police reports against the Petitioner for fabricated misdemeanors, cheating on the Petitioner, repeatedly lying to the Petitioner's family and friends. Even telling the Petitioner's neighbors horrible stories of sorted sex orgies.

Unbeknownst, to the Petitioner Johanna H. Martinez, who lived right beside the Petitioner's ex girlfriend, Christine M. Rorabaugh believed the stories. Ms. Martinez set up a fake date with the Petitioner with the clear intention of framing the Petitioner on September 07, 2018.

The lead detective, Christopher T. Fisher interviewed an ex-girl friend of the Petitioner, Rachelle C. Dutreix, who was upset over his reporting her the various Federal and State agencies. After a secret September 18, 2018 meeting between Det. Fisher and Ms. Dutreix that was not recorded. The Petitioner was charged with another fabricated sex crime. Attempted Rape. Ms. Dutreix claimed she was scared to call the police. She was not scared on November 2016 and June 2017, when she called Louisiana police twice to report the Petitioner for fabricated misdemeanors. 1st police report. Allegedly the Petitioner committed simple criminal damage. 2nd police report. The Petitioner placed on the internet that Ms. Dutreix was a "hustler" who conned older men. Beware!

None of the above was allowed in the Petitioner's April 2021 trial. The Petitioner's opening statement was cut off by the judge before he could even mention Ms. Dutreix. In fact, on the witnesses stand, the woman would not answer ANY questions on the as "posed" from the Petitioner. The Petitioner repeatedly objected and ask for instructions. Judge Steven C. Grefer always refused to instruct the witnesses to answer the questions. The petitioner was overwhelmed by the amount of fabricated evidence and fabricated testimony allowed in the trial.

Not to mention the eight expert witnesses the State of Louisiana was allowed. The defense was allowed NONE!

The Petitioner direct testimony was cut off by the judge. 24th Judicial District Judge, Steven C. Grefer was bias from the beginning due to "undue influence" applied by a Lt. Jason Hippler of the Jefferson Parish Sheriff's Office, (JPSO). And Lead Westwego Detective, Christopher T. Fisher who knew Lt. Hippler while Det. Fisher was employed with JPSO. Judge Grefer would not allow the jury to hear that Det. Fisher had in fact been fired from JPSO for "forging scripts" of an illegal drug know as "OxyContin." Judge Grefer who was an ex ADA himself always ruled in favor of the police. No matter how corrupt they were. His bias, which was seen through his repeated rulings against the Petitioner for basic procedural due process requests in pre-trial. This affected the fairness of the original pre-trial and trial.

Several of the Petitioner's attorney's in pre-trial flat out stole from him. Lost important evidence. Failed to secure evidence. Key to proving the Petitioner's side of the story. The Petitioner had none of that evidence to show the Louisiana Jury.

The Petitioner first attorney lied his way into the case. His name was John Courtney Wilson. After that, the lies never stopped. \$60,000 thousand dollars later in property losses. Lost evidence, failure to secure the crime scene. The Petitioner fired him. The Petitioner never recouped any of his fees or the Petitioner's personal property.

The Petitioner then hired New Orleans Attorney Martin E. Regan, Jr.

The Petitioner was forced to represent himself Pro-Se after his second paid attorney, Martin E. Regan, Jr, stole his retainer fee of \$10,000 dollars. Martin E. Regan, Jr, was a great attorney for a "guilty man" but, a horrible attorney for an "innocent man." Petitioner needed an attorney to secure certain facts that proved his version of events. Mr. Regan filed one motion, did not even argue that motion. The Petitioner frustrated after seven months fired Mr. Regan. Attorney Martin Regan, Jr claimed he mailed a refund back to the Petitioner in 2019, to the Petitioner's home address. But, since the Petitioner remained incarcerated from 2018-2021 in Jefferson Parish Jail. The Petitioner never received the refund.

And to this day does not know where that fictitious retainer refund is?

Attorney Regan knew this. It was clear retaliation. Over his firing in open court and the Petitioner's repeated complaints against the attorney for loss of evidence, missed court dates etc...., failure to secure the original staged crime scene. Based on the misconduct of the missing retainer fees, the Petitioner was NEVER able to retain other paid counsel. Attorney Martin E. Regan, Jr, wholeheartedly, failed to conduct a prompt investigation of the circumstances of the fabricated sex crimes. Or explore all avenues leading to facts relevant to the merits of the case. The Petitioner needed help very quickly securing the truth before it was lost. Attorney Martin E. Regan, Jr, repeatedly lied to the Petitioner always sending some other attorney to deliver an excuse.

The Regan Law Firm represented too many Louisiana citizens. And because of that fact, innocent men were being sent to prison, because Attorney Regan could not, would not deliver the "effective assistance of counsel" the Petitioner needed to prove his innocence. Attorney Regan lost evidence, failed to secure evidence and then lied about it.

The Petitioner was forced to represent himself "Pro-Se."

The Petitioner was assigned Louisiana Indigent Defender "Price Quenin" as "stand by counsel. The Petitioner and Attorney Quenin first conversation was "what was Mr. Quenin allowed to do?" Neither could find any case law that set any parameters as what Mr. Quenin's duties were to the Petitioner? This caused major problems, that lead to mistrust between the "Petitioner" and "Stand by Counsel." Because of a lying letter sent to the Stand by Counsel by Attorney Courtney John Wilson claiming the Petitioner was crazy and could not defend himself, the Petitioner's relationship with Stand by Counsel was doomed. Stand by Counsel did almost nothing to assist the Petitioner in proving his "actual innocence." This allowed the State of Louisiana to easily convict the Petitioner of fabricated sex crimes that never happened.

Unbeknownst, to the Petitioner the State of Louisiana allows the District Attorneys to hand pick the district judge your assigned. Thus robbing its citizens of any impartiality. Right away the Petitioner started experiencing "misconduct by Louisiana court officials" To wit;

Original police reports were being changed, witness statements were being changed, evidence was being lost, misplaced or destroyed and withheld by the police.

The Petitioner subpoenaed forty-six witnesses for trial. Unbeknownst, to the Petitioner all forty-six were being subpoenaed every month to appear in court for three years straight. The Petitioner's witnesses became very upset and never showed for the April 2021 trial date.

This is a very common occurrence in Louisiana criminal justice system.

Additionally, the Petitioner requested over forty "subpoena duces tectum's" for production of documents that proved his innocence. In illegal fashion, the State of Louisiana received the RETURNS and held them for over two years. Some of those documents were finally given to the Petitioner several days before trial. They were requested by the defense. No ADA should have had possession of any defense documents unless, the Petitioner planed to use them at trial.

Multiple pre-trial hearings were denied unjustly. Or flat out rigged.

Every attempt by the Petitioner to prove his "actual innocence" was interfered with by rouge detectives bent on a false conviction.

Many facts were withheld by the Jefferson Parish District Attorney's Office (JPDA). 1. Det. Fisher had a relative in the JPDA Office.

The Trial of the Petitioner was riddled with misconduct. First by police and then by prosecutors. Every request for admission of key evidence was rejected by the gatekeeper 24th Judicial District Judge, Steven C. Grefer. Judge Grefer used his judgeship to assist the police and prosecutors convict the Petitioner based on fabrications told to the judge by those same police and prosecutors. Original police reports, witness statements, were in fact changed. Truthful testimony was kept out. Factious stories were of course allowed by Judge Grefer.

Fake evidence and even fake made up pictures of fabricated rapes were shown to the jury.

The Petitioner was helpless to defend himself from the barrage of fabricated testimony or evidence. The Petitioner was amazed at the amount of FAKE, made up evidence of a crime "that did not even happen." The lengths the JPDA Office was willing to go, to falsely convict an "innocent man" was amazing and quite scary.

After the unjust verdict.

The Judge also changed the official trial record by “nunc pro tunc” without notice to the Petitioner. Removing what little truth the Petitioner could inject into the sham trial.

The Petitioner’s direct appeal was rigged. The Petitioner was appointed the Louisiana Appellate Project. Run by an ex-corrupt state prosecutor named Bruce Whittaker. Yes, the same attorney in **Connick V. Thompson, 131 S. Ct. 1350 (2011)**. The Petitioner was appointed an “attorney” Prentice L. White, who sold the Petitioner out and only briefed one error on a “life sentence.”

The Petitioner is in his sixties, his current release date is 2068 and must serve 100% of his 50 years of his Louisiana prison sentence. Do the math.

The Petitioner filed his supplemental direct appeal, Petitioner’s pro-se thirteen claims on direct were not heard. Based on no proof in the record. Those claims were denied based on no proof. (no transcripts). See **Patton V. Louisiana, 355 So. 3d 156 (2022) La.**

The Petitioner’s attempts to secure the pre-trial and trial transcripts were met with denials.

The Petitioner filed a post-conviction containing thirty (30) grounds for relief. The judge denied those as well. Rubberstamped denials. The Petitioner appealed to the State’s highest court.

Claiming the Petitioner received no “due process” of evidentiary hearings, the Petitioner was in fact not “procedurally defaulted” as ruled. The State of Louisiana was illegally applying new harsher post conviction rules on the Petitioner. Those writs were all “rubber stamped” in fact, the Petitioner was afforded no “due process” as required by Louisiana and United States Constitutions.

Reasons for Granting the Petition

This Court has jurisdiction over the final judgement of the state postconviction court. 28 U.S.C. 1257(a);

This court can correct a "miscarriage of justice." The Petitioner is "actually innocent" of all the alleged sex crimes. This is the Petitioner's court of last resort! A hail mary. The Petitioner has not received "due process of law." Only a "extreme malfunction" of the state criminal justice system.

Every attempt of the Petitioner to prove his "actual innocence" has been met with interference, undue influence by 24th Judicial District Judge, Steven C. Grefer due to fabricated allegations by woman, the Petitioner repeatedly reported for crimes against the State and Federal governments.

The Petitioner has not received due process of law on the post conviction process. The Petitioner needed transcripts, evidentiary hearings to prove his thirty grounds.

The Petitioner avers that the State of Louisiana through its Police, Assistant District Attorney's broke the law repeatedly to gain fabricated convictions, just so a Pro-Se Louisiana citizen could not brag, "I WON!" It is said "When the government becomes a lawbreaker, it breeds contempt for the law." **Olmstead et al, V. United States**, 48 S. Ct. 564 (1928).

The United States Supreme Court needs to address the practice of unequal treatment of Pro-Se Defendants in Louisiana District and Appellate Courts.

The Petitioner was not able to subject the prosecution's case to meaningful adversarial testing due to undue influence on every turn. On Pre-trial motion hearings, trial, post trial and direct appeal, post conviction proceedings. Petitioner's post conviction claims tried to expose the injustice!

If the equal justice under law phrase engraved on the front of this United States Supreme Court building requires two individuals from different States who raised essentially the same constitutional claims receive the same answer from the courts. The Petitioner deserves a ruling of "new trial" too! See **People V. Harvey Weinstein**, 42 N.Y. 3d 439, (2024). (propensity evidence)

The "actual inequity" that results when the Court chooses which many similarly-situated Petitioner's should be the chance beneficiary of a given rule. **United States V. Johnson**, 457 U.S. 537, 556, n 16 (1982).

There is no need to "force" Petitioner John Wesley Patton, to endure yet, more time in Unconstitutional Louisiana [Prisons] in service of convictions that are CLEARLY constitutionally flawed. While this court continually rules that Louisiana violates the Constitution? **Brown V. Louisiana**, 598 U.S. ___, ___ (2023).

United States Supreme Court, Rule 10(b)

United States Supreme Court, Rule 10(b) The Louisiana Supreme Court has so far departed from the accepted and usual course of judicial proceedings. This Petitioner requests the Supreme Court exercise its power. To correct the "injustices" of the Louisiana District Court Judges.

Over and over this Court hears case after case wherein a Louisiana Citizen has been wrongfully convicted. Again in front of this Court stands John Wesley Patton, who is indeed wrongfully convicted. This Court should act?

Arguments

Arguments for Questions One through Thirty-Three

Each of the thirty-three questions represents two very important aspects of; **1.** A question of a specific procedure of a State postconviction claim. **2.** Louisiana Law that is UNCONSTITUTIONAL and allowing innocent men and woman to be falsely convicted. Unfortunately, this court has repeatedly reversed Louisiana courts for unconstitutional violations of law. **Kyles**, 514 U.S., **Smith**, 565 U.S., **Brumfield**, 576 U.S., **Wearry**, 577 U.S.,

Arguments for Overturning the Petitioner's Convictions

It would be perverse to allow manifestly erroneous lower-court judgements to stand precisely because of their cursory analysis. The analysis the postconviction court did provide is wrong on its face, and the Court at the very least should correct the obvious legal errors contained in question **one** through **thirty-three**. And remand for proper analysis. **Grady V. North Carolina**, 575 U.S. 306, (2015)

In fact, the Petitioner received no "due process" on the state post conviction proceedings. No evidentiary hearings as other Louisiana citizens were afforded. The Petitioner was "rubberstamped." DENIED. Certain Louisiana officials are using "undue influence" to unjustly keep the Petitioner incarcerated. This Court should act?

The Petitioner understands that the Court is less app to intervene in "state postconviction proceedings," as opposed to after federal habeas review. **Lawrence V. Florida**, 549 U.S. 327 334 (2007). Summary reversal, moreover is generally inappropriate in "fact-intensive" cases, especially with lengthy trial records. See. **Cavazos V. Smith**, 565 U.S. 1, 9, 11, 16-17, (2011).

This case is unique due to the fact the Petitioner challenges several Louisiana Laws as unconstitutional! Granted the case may be "fact-intensive" if indeed the Petitioner ever possessed the trial transcripts. The Louisiana Courts have for no good reason kept the trial transcripts from the Petitioner. He is "actually innocent" and promised swift justice once proven.

The Louisiana Supreme Court one-page denial borders open defiance to the United States Constitution due process clauses.

Pursuant to the United States Constitution of 1776, **Article 5 & 14. Due Process of Law.** The Petitioner shall not be deprived of life, liberty, and/or property, except by due process of law. This is binding on the States.

The Supreme Court has interpreted Fourteenth Amendment due process protections to require a new trial when convictions are obtained through material evidence known to be false by representatives of the State. **Giglio V. United States** 405 U.S. 150, 153-54, 92 S.Ct. 736, 31 L.Ed.2d 104 (1972); **Napue V. Illinois** 360 U.S. 264, 269, 79 S.Ct. 1173, 3 L.Ed.2d 104 (1959). This is true regardless of whether the State solicits false testimony or merely allows testimony which it knows to be false to go uncorrected. **Giglio**, 405 U.S. at 153, 92 S.Ct. 763; **Napue** 360 U.S. at 269, 79 S.Ct. 1173. The rule extends to evidence going to the credibility of a witness when that witnesses (sic) testimony is material to the case. **Giglio** 405 U.S. at 154, 92 S.Ct. 763. Any understanding or agreement as to the future prosecution would be relevant to the witness's credibility and the jury's entitlement to know. **Id** at 155, 92 S.Ct. 763. In addition, when the prosecution has evidence favorable to a Petitioner in its possession it must produce that evidence. **Brady V. Maryland** 373 U.S. 83, 83 S.Ct. 1194, 10 L.Ed.2d 215 (1963). The evidence need not be exculpatory; a constitutional violation also occurs when material impeachment evidence is withheld. **U.S. V. Bagley** 473 U.S. 667, 676-83, 105 S.Ct. 3375, 87 L.Ed. 2d 481 (1985)

U.S.C.A. Const. Amendment 14:

Section 1. All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State (Louisiana) deprive any person of life, liberty, or property without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

Due Process forbids the states from employing inconsistent and irreconcilable theories, fabrications and/or falsehoods to secure convictions against individuals for the same offenses arising from the same event. **Smith V. Goose**, 205 F.3d 1045, 1048-49 (8th Cir. 2000), cert denied, 531 U.S. 985, 121 S.Ct. 441, 148 L.ed.2d 446 (2000).

The due process Clause of the United States Constitution requires “a fair trial in a fair tribunal,” before a judge with no bias or interest in the outcome. **Bracy V. Gramley**, 520 U.S. 899, 904-05, 117 S.Ct. 1793, 138 L.Ed. 2d 97 (1997).

Under the Due Process Clause of the Fourteenth Amendment, criminal prosecutions must comport with prevailing notions of fundamental fairness. We have long interpreted this standard of fairness to require that criminal defendants be afforded a meaningful opportunity to present a complete defense. **United States V. Valenzuela-Bernal**, 458 U.S. 858, 867, 102 S.Ct. 3440, 3447, 73 L.Ed.2d 1193 (1982).

This court should overturn the Petitioner's unjust convictions for the reasons that are plaguing Louisiana criminal justice system. See **Moore V. Texas**, 586 U. S. 133, 139, 143 (2019), Summarily reversing where the state court "repeated" the errors that this court previously condemned. Id at 143. Louisiana continues to frame and withhold evidence from its citizens. The Petitioner's case is just another example of the out of control justice system in Louisiana.

The Petitioner was lied on. Evidence was withheld. The Petitioner was not afforded a "fair trial" as guaranteed by the Louisiana and United States Constitutions. And this Court refuses to address that?

That raises the final argument: "The actual inequity that results when the Court chooses with of many similarly situated Petitioner's should be the chance beneficiary of" a given rule, or constitution right." **United States V. Johnson**, 102 S. Ct. 2579 (1982).

Many Louisiana citizens with less misconduct in trial and postconviction proceedings have been granted "writ of certiorari" simply because they could afford "high paid attorney's" or were on death row. The Petitioner was given a LIFE SENTENCE. 50 years in Louisiana even for a fabricated sex crime requires sentence to be served flat. His current release date is 2068. The Petitioner is 62. You do the math.

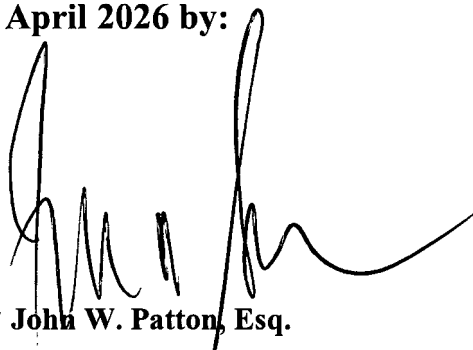
Conclusion

WHEREFORE, for the reasons presented herein, that there are extraordinary reasons for the **GRANTING** of the Petition for Writ of Certiorari contained herein. Petitioner requests this Honorable Supreme Court invoke its original jurisdiction and **28 U.S.C.A. 1257(a)** State Court Certiorari.

Petitioner prays that this Honorable United States Supreme Court grant this Petition for Writ of Certiorari

Reversing the Petitioner's conviction and sentence and remanding for a New Trial.

Respectfully submitted on this 24th day of April 2026 by:

A handwritten signature in black ink, appearing to read 'John W. Patton', with a long, sweeping horizontal stroke extending to the right.

John W. Patton, Esq.

DPSC No. 327902

BB Sixty Rayburn Corr. Cte.

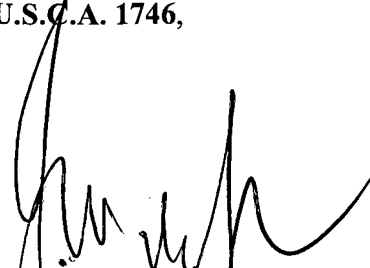
27268 Highway 21 North

Angie, Louisiana 70426

Verification Affidavit

I do hereby swear under the penalty of perjury that the contents of the foregoing are true and correct to the best of my knowledge and understanding.

I further swear pursuant to penalty of perjury, 28 U.S.C.A. 1746,



John W. Patton, Affiant

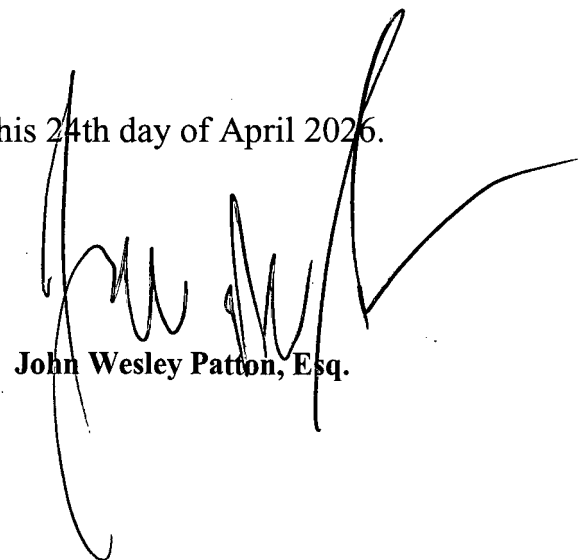
DPSC No. 327902

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SWORN TO AND SUBSCRIBED, before me this 24th day of April 2026.



John Wesley Patton, Esq.