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STATE OF MICHIGAN

IN THE SUPREME COURT

THE PEOPLE OF THE
STATE OF MICHIGAN,

vs.

MONTEZ A. STOVALL,

Defendant.
_______________________________/

Supreme Court No.: 162425

Court of Appeals No.: 342440

Lower Court Nos: 92-000334
92-000335

AMICUS BRIEF IN SUPPORT OF DEFENDANT MONTEZ A. STOVALL

I, **ARTHUR LEON JONES #243436**, states the following to be true:

I filed answers to the questions presented in this Honorable Court's Order issued April 30, 2021.

I humbly request to have my invitation granted to file an Amicus Brief on behalf of the Defendant Montez A. Stovall.

Thank you for your time and cooperation.

Dated:

Michigan Supreme Court
Michigan Hall of Justice
925 West Ottawa Street
P. O. Box 30022
Lansing, Michigan 48909

Humbly Submitted,

Arthur Leon Jones #243436

ARTHUR LEON JONES #243436
Kinross Correctional Facility
4533 West Industrial Park Drive

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I. WHETHER DEFENDANT'S PAROLABLE LIFE SENTENCES FOR SECOND-DEGREE MURDER WERE THE RESULT OF AN ILLUSORY PLEA BARGAIN?

When Montgomery v. Louisiana, 577 US 190, 136 S. Ct. 718; 193 L. Ed. 2d 599 (2016), became retroactive Defendant Montez A. Stovall, immediately filed a 6.500 Motion for Relief from Judgment contesting the validity of his plea relying solely on the language spoken in Teague v. Lane, 489 US 288 (1989), that establishes that courts must first give retroactivity to new substantive rules of constitutional law.

Rules that would prohibited a certain category of punishment of primary conduct as well as forbidding a specific punishment for a class of defendants' because of their status or for a class of defendants' because of their status or offense.

Most importantly courts were obligated to give retroactive effect to new watershed rules of criminal procedure that implies fundamental fairness and accuracy of criminal proceedings.

The first exception shed light on the terms of substantive categorical guarantees defined by the constitution, regardless of the procedures . . . whether a new rule bars states from proscribing certain conduct or from inflicting a specific punishment, regardless of the circumstances. The Constitution itself deprives the state the power to impose a certain penalty.

The state may not constitutionally insist that a prisoner remain in confinement, it may not constitutionally insist on the same result in its own post conviction proceedings under the superior clause of the Constitution.

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State collateral review court have no greater power than federal habeas court to mandate that a prisoner continue to suffer punishment barred by the constitution.

The validity and integrity of Defendants' plea raises doubt do to the fact that the Defendant was not afforded an opportunity of a mitigating hearing. Defendant took this plea to avoid an unconstitutional sentence that trial court had no authority to impose.

The trial court failed to correct a constitutional violation when the Defendant filed a 6.500 Motion for Relief from Judgment; and Defendant raised the factors in Miller v. Alabama, 567 US 460, 132 S. Ct. 2455; 183 L. Ed. 2d 407 (2012), making trial court aware of the retroactivity of Montgomery v. Louisiana, supra, a case that was formulated from the language spoken in Miller, holding that a "Life means Life" sentence for a juvenile homicide offender violates the Eighth Amendment prohibition on cruel and unusual punishments. A "Life means Life" sentence poses to great a risk of disproportionate punishment. Miller, requires that sentencing courts to consider a child diminished culpability and heightened change before condemning him to die in prison.

The same possibility of a valid result does not exist where a substantive rule has eliminated a States power to proscribe the defendants' conduct or impose a given punishment; see US v. US Coin & Currency, 401 US 715, 915 S. Ct 1041, by holding that new substantive rules are indeed retroactive. Teague continued a long tradition of recognizing that substantive rules must have retroactive effect regardless of when the Defendant Montez A. Stovall conviction became final.

Retroactivity releases the tenacious grasp of a plea bargain, traveling back to the moment of when the plea bargain was agreed upon; when a constitutional violation occurs Teague v. Lane, supra set forth a framework for the retroactive application for a

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new constitutional rule to convictions that were final when the new rule was announced; the same logic governs a challenge to a punishment that the Constitution deprives States the authority to impose, by law; a "Life means Life" sentence for a juvenile is unconstitutional. People v. Falkenberg, 124 Mich. App. 173 (1983).

The prosecutor made an illusory promise for a concurrent sentence to avoid a consecutive sentence that the law prohibited the court to impose. A plea must be vacated when the prosecutor induced the plea by promising to recommend an illegal sentence. People v. McLaren, 14 Kan. App. 2d 449; 793 P. 2d 763 (1990).

When the prosecutor promised to dismiss a felony charge of possession of a weapon, the plea was illusory because the weapon was a toy gun and a felony conviction was legally impossible. People v. Schofield, 124 Mich. App. 134; 333 NW2d 602 (1983).

In People v. Smith, 90 Mich. App. 572; 282 NW2d 399; Mich. App. LEXIS 2194 (1979), the defendant argued that his guilty plea's were involuntary due to the illusory nature of the plea agreement because he could not have been prosecuted as a habitual offender; the court held that under Michigan's multiple offender recidivist statute MCL 769.10 et seq., in order for defendant to be subject to supplementation, the first felony conviction had to predate the commission of the second felony; defendant had not been convicted of any previous felonies when he pled guilty to each of the charges.

As defendants' plea was induced by a promise to forego a recidivist proceeding where no such proceeding was warranted, defendant was prose misinformed as to the benefit of his plea and the bargain was hence illusory. People v. Sanders, 91 Mich. App. 7371 283 NW2d 841 (1979); People v. Martin, 100 Mich. App. 447; 298 NW2d 192; 1080 Mich. App. LEXIS 2963.

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A guilty plea is invalid if it is induced by false promises, fraud, mistake or misapprehension of the conditions. Blackledge v. Allison, 431 US 63, 97 S.Ct 1621; 51 L.Ed.2d 136 (1977).

Now, knowing that imposing a "Life means Life" sentence for a juvenile offender (being charge as an adult) without a mitigating hearing is unconstitutional; the then consider the fact that the Defendant plead to a lesser charged to avoid an unconstitutional sentenced that trial court had no authority to impose at trial nor uphold in its ruling in Defendants' 6.500 Motion for Relief from Judgment . . . by holding that new substantives rules are, indeed, retroactive.

Teague continued a long tradition of recognizing that substantive rules must have retroactive effect regardless of when the Defendant Montez A. Stovall conviction became final. For a conviction under an unconstitutional law "is not merely erroneous, but is illegal and void, and cannot be a legal cause of imprisonment. Ex Parte Suebold, 100 US 321; 376-377; 25 L.Ed. 717.

II. WHETHER DEFENDANT'S SENTENCES VIOLATE THE PROHIBITION AGAINST "CRUEL AND UNUSUAL PUNISHMENT" FOUND IN THE EIGHTH AMENDMENT TO THE UNITED STATES CONSTITUTION, OR THE PROHIBITION AGAINST "CRUEL AND UNUSUAL PUNISHMENT" FOUND IN CONST. 1963, ART 1, SUB SEC. 16 WHERE HE WAS UNDER THE AGE OF 18 AT THE TIME OF THE OFFENSES?

When Defendant Stovall committed these crimes he was a juvenile, who stood charged as an adult for first degree murder facing a mandatory life sentence if found guilty.

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The Defendant was advised by trial attorney to plea to a lesser offense under MCL 750.317 & MCL 791.234, during that time the court considered and treated Defendant as an adult.

After the U.S. Supreme Court held that the Eighth Amendment prohibits capital sentences for juveniles who committed murder, Roper, 543 US at 578-79, and mandatory life sentences for juveniles who committed non homicide offense, see Graham v. Florida, 560 US at 82; 130 S.Ct 2011; 176 L.Ed.2d 825), and a "Life means Life" sentences for juveniles who committed murder. (Miller, 567 US at 489).

Roper, Graham and Miller established that children are constitutionally different from adults for sentencing purposes. Yet when the trial court was made aware of the two different statutes MCL 750.317, MCL 791.234 and MCL 769.25a, by the Defendant, in his 6.500 Motion for Relief from Judgment. The trial court abused its discretion by failing to grant relief, knowing that Defendant Stovall, remains sentence under MCL 750.317, which allows the parole board to apply their "Life means Life" policy under MCL 791.234 statute, while under their jurisdiction. This statute is intended for an adult.

This statue allows the parole board to continue to look over the Defendants' case file without a review like the board been doing for the last twenty years. Defendant Stovall has been confined for thirty years and still has not been considered for a public hearing to be considered for a parole.

Hypothetically speaking, the parole board places Defendant on parole, while on parole the Defendant gets a violation for failing to report to work, he's then arrested and sent back to prison, where he remains under the jurisdiction of the parole board, where he is subjected to an unconstitutional statute MCL 791.234. A statute that was intended for an adult and not a juvenile offender.

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A plea withdrawal is the only alternative that relieves the Defendant from an unconstitutional punishment, under the current statute MCL 791.234, Defendant Stovall is sentenced under does not instruct the parole board to consider his youth during the commission of his crimes.

The Defendant continues to serve a defacto "Life means Life" sentence without a mitigation hearing; though children are constitutionally different from adults a factor that should had been considered during sentencing.

Children are not fully developed mentally and bad behavior can be corrected, knowing that it was their lack of maturity, and no sense of responsibility, is the cause of their impulsive behavior.

Children are insecure with a mental instability who are easily influence to partake in negative activities from family and peers. Children have limited control over their own environment and lack the ability to distance themselves from criminal surroundings.

Also, a child's character and mental capacity has not matured as an adult's. Even if a sentencing court considers a child's age before sentencing them to a "Life means Life" prison term. This sentence still violates the Eighth Amendment for a child whose crime reflects unfortunate yet transient immaturity. See Miller Id. at 132 S.Ct 2455, 2469; 183 L.Ed.2d 407, 424.

In Montogomery's case expert testimony determined that he had limited capacity for foresight, self discipline, and judgment; acknowledging his potential for rehabilitation.

Defendant Stovall was not afforded such recognition by trial court in his 6.500 Motion for Relief from Judgment nor at sentencing . . . a new constitutional rule must be applied

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retroactively "to all cases, State or Federal."

The trial court may not disregard a controlling constitutional command in their own courts. Martin v. Hunter Lessee, 140 S.Ct. 304 1 Wheat 304, 340-341, 344, 4 L.Ed. (1816); and Yates v. Aiken, 484 US 211, 218; 108 S. Ct. 534, 88 L.Ed.2d 546 (1988).

When a state has not "placed any limit on the issues that it will entertain in collateral proceedings . . . it has a duty to grant the relief that federal law requires; and protection against disproportionate punishment is the central substantive guarantee of the Eight Amendment and goes for beyond the manner of determining Defendant's sentence.

Under the Michigan Parole Board Policy of "Life means Life", see Graham v. Florida, at 59, 130 S. Ct. 2011; 176 L. Ed. 2d 825. The concept of proportionality is central to the Eighth Amendment; see Weems v. United States, 217 US 349, 367; 30 S.Ct. 544; 54 L. Ed. 793 (1910); and Harmelin v. Michigan, 501 US 957, 997-98; 111 S.Ct. 2680; 115 L. Ed. 2d 836 (1991). When a sentence is excessive confinement is unlawful by Art 1 Section 16 of the Michigan Constitution. People v. Lorentzen, 387 Mich. 167, 172 (1972).

III. WHETHER THE PAROLE BOARD'S "LIFE MEANS LIFE" POLICY RENDERS THE DEFENDANT'S SENTENCES UNCONSTITUTIONAL UNDER MILLER V. ALABAMA, 567 US 460 (2012), AND MONTGOMERY V. LOUISIANA, 577 US 190 (2016)?

Defendant contends that it does. The boards' practice and philosophy undermines the language spoke in Miller and Montgomery providing a juvenile offender with a meaningful opportunity for

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release.

Now the prosecutor may argue that the board have released a lot of juveniles since the retroactive ruling in Montgomery v. Louisiana, but what the prosecutor refuses' to acknowledge is that a vast amount of juvenile offenders like the Defendant remain convicted under the statute MCL 750.317, under the parole board's jurisdiction, MCL 791.234, is allowed to be applied on the Defendant.

These statutes considers and treat the Defendant as an adult despite the instructions given in Miller, requiring sentencing courts to consider a juvenile offender's youth before imposing a "Life means Life" sentence.

The fact that the Defendant and other juveniles alike are not being afforded the same opportunities as other juveniles that are being sentenced under the revised MCL 769.25a (a statute that instructs the parole board to consider the factors of youth and to differentiate an adult from a juvenile), is a constitutional violation in itself.

Miller announced a substantive rule of constitutional law, like other substantive rules retroactivity is necessary because it carries a significant risk that just like the Defendant here, the vast majority of juvenile offenders remain confined under an unconstitutional punishment that by law trial court cannot impose.

Yet, being sentenced under MCL 750.317, A statute which permits the parole board to invent a penological justification for imposing a "Life means Life" sentence, an unconstitutional penalty for a class of defenders whose crimes reflect the transient immaturity of youth. Penry v. Lynaugh, 492 US at 330, 109 S.Ct. 2934; 106 L. Ed. 2d 256.

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The more important question, is it the responsibility of the parole board to relinquish their jurisdiction over the Defendant Stovall, because he was sentenced under an unconstitutional statute, that allows the board to practice an unconstitutional policy treating him like an adult, ignoring the factors of his youth.

Or is it the duty of the trial court to grant the Defendant Stovall, 6.500 Motion for Relief from Judgment, when there is a clear constitutional violation?

A retroactive change in law that establishes a deviation in law, MCR 6.610(E)(b), a new constitutional rule must be applied retroactively "to all individual cases State and Federal" trial court may not disregard a controlling constitutional command. Martin v. Hunter Lessee, 14 US 304, 1 Wheat, 304, 340-341, 344; 4 L.Ed. 87 (1816); and Yates v. Aiken, 484 US 211, 218; 108 S.Ct. 534; 98 L. Ed. 2d 546 (1988).

Though the Defendant filed a grievance concerning this issue, exhausting all state remedies no action to alleviate this matter, as the parole board continues its unconstitutional practice. (See attachment A).

IV. WHETHER PURSUANT TO MILLER AND MONTGOMERY, THE TRIAL COURT WAS REQUIRED TO TAKE THE DEFENDANT'S YOUTH INTO CONSIDERATION WHEN ACCEPTING HIS PLEA AND RULING ON HIS MOTION FOR RELIEF FROM JUDGMENT?

Under the advisement of the trial court the Defendant, must be informed of the maximum sentenced permitted by law MCR

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6.610(E)(a). The Defendant was advised that the law permits the court to sentence him to a mandatory life sentence if found guilty of the offense he was charged with.

Once Montgomery v. Louisiana, 577 US 180 (2016), became retroactive the Defendant plea agreement became tainted. It is the duty of the trial curt to advise the Defendant that by law he is entitled to a mitigating hearing to determine if a mandatory life sentence would be appropriate . . . the fact the Defendant was deprived of this privilege and opportunity is A clear violation of his constitutional rights.

In Teague v. Lane, 489 US 288 (1989), retroactivity is define by recognition of the courts obligation of applying the retroactive effect to new watershed procedural rules and to substantive rules of constitutional law.

Substantive constitutional rules include "rule forbidding criminal punishment of certain primary conduct and rules prohibiting a certain category of punishment for a class of defendants' because of their status or offense.

Also, it was ruled in Montgomery v. Louisiana, that it is required of the trial court to consider a juvenile offender's youth before imposing a "Life means Life" sentence, it was established that there is no penological just cause for a "Life means Life" sentence in awareness o the uniqueness of an adolescence's mentality.

Because it was established in Miller that sentencing a child to a "Life means Life" sentence, denies him a meaningful opportunity for release, and a life beyond the walls of incarceration, is excessive, (according to the Michigan Parole Board Member's testimony before legislation a life sentence means a life sentence) for all but the rare juvenile offender whose crime reflects irreparable corruption, it renders a "Life means

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Life' sentence or depriving a juvenile offender a meaningful opportunity for release an unconstitutional penalty for a class of defendants because of their status, that is juvenile offenders whose crimes reflect the transient immaturity of youth.

At no time did trial court nor the parole board hold a hearing to determine that the Defendant crimes reflect "irreparable corruption." Miller announced a substantive rule of constitutional law. Now pertaining to the Defendant, Miller retroactivity is necessary because as it stands right now like the Defendant and a vast majority of juvenile offenders that are sentenced under MCL 750.317; and to the statute MCL 791.234, under the jurisdiction of the parole board.

While other juvenile offenders that are being convicted or resentenced under the revised MCL 769.25a. The Defendant and a vast of juveniles alike remain confined under a sentence that the trial court by law cannot impose on them.

The fact that the trial court did not acknowledge this change in law unravel the integrity of this plea agreement and creates an instability in the foundation of the plea proceedings; and this is substantial grounds for plea withdrawal under the guise of retroactivity, that establishes if a practice of law is unconstitutional, and now that practice was unconstitutional during the acceptance of this plea!

Before accepting a guilty plea the court must determine that the plea is accurate MCR 6.610(F)(1), this plea, that the Defendant enter into cannot be considered as accurate when he accepted this plea. It was under the advisement that would be given to an adult and not the advise that other juveniles are receiving under the new MCL 769.25a.

It has been established that the Defendant, was a juvenile during commission of these crimes. Once Montgomery v. Louisiana,

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577 US 190 (2016), became retroactive trial court had an obligation in its ruling in Defendants' 6.500 Motion for Relief from Judgment to determine that a deviation of law had occurred that affected the Defendant substantial rights.

The trial court should of immediately provided Defendant with the option and opportunity to withdraw his plea or to continue to stand MCR 6.610(E)(b). "A conviction under an unconstitutional law is not merely erroneous, but it is illegal and void, and cannot be a legal cause of imprisonment. It is true, if no writ of error lies, the judgment may be final, in the sense that there may be no means of reversing it.

But, if the laws are unconstitutional and void, the circuit court acquired no jurisdiction of the causes. The same logic governs a challenge to a punishment that the Constitution deprives states of authority to impose. A conviction or sentence imposed in violation of a substantive rule is not just erroneous but contrary to law and as a result void." 2016 US LEXIS 862.

CONCLUSION

The Defendant humbly request that this Honorable Court grant him relief by being allowed to withdraw his plea in both convictions and face original charges; due to the fact that trial court abused its discretion in ruling on the Defendants' 6.500 Motion and continue to ignore the parole board's constitutional inaccuracies by allowing the Defendant to remain confined under the parole board's jurisdiction.

The parole board continues to practice an unconstitutional MCL 791.234, that does not differentiate a juvenile from an adult. Also, the Defendant enter into an illusory plea to avoid an unconstitutional sentence that trial court had nor has the authority to impose nor uphold.

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an unconstitutional sentence that trial court had nor has the authority to impose nor uphold.

For the reason in the above caption Amici Defendant humbly request that this Honorable Court GRANT Defendant full relief.

Michigan Supreme Court
Michigan Hall of Justice
925 West Ottawa Street
P. O. Box 30022
Lansing, Michigan 48909

Humbly Submitted,

Arthur Leon Jones #243436

ARTHUR LEON JONES #243436
Kinross Correctional Facility
4533 West Industrial Park Drive
Kincheloe, Michigan 49788-1638

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ATTACHMENT-A

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Michigan Department of Corrections

GRIEVANCE REJECTION LETTER

DATE: 3/3/21

TO: Stovall #2285[illegible]1 B2-42

FROM: **M. Gustafson, KCF** Grievance Coordinator

SUBJECT: Receipt/Rejection for Step I grievance.

Your Step I grievance is being rejected per in part PD 03.02.130 Section J paragraph 10 states, "Decisions made by the Parole Board to grant, deny, rescind, amend or revoke parole or not to proceed with a lifer interview or a public hearing, are non-grievable issues." If you have any questions, consult PD 03.02.130 "Prisoner/Parolee Grievances" which is available in the institutional library. Grievance is rejected at Step I.

Any future references to this grievance should utilize this identifier:

KCF 2103 151 27D

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STEP II GRIEVANCE RESPONSE FOR PRISONER: Stovall 228551 B-2-42 (KCF)

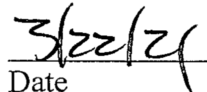
Grievance **KCF 2103 151 27D,** has been reviewed.

Grievant claims he is serving a juvenile life sentence and the Michigan Parole Board continues to deny him parole consideration.

The Step I respondent, Grievance Coordinator Gustafson, indicates that this grievance is being rejected. PD 03.02.130 Section J section 10 states, "Decisions made by the Parole Board to grant, deny, rescind, amend or revoke parole or not to proceed with a lifer interview or a public hearing, are non-grievable issues." If you have any questions, consult PD 03.02.130 Prisoner/Parolee Grievances, which is available in the institutional library.

The Step I rejection has been reviewed by the Warden's Office in accordance with PD 03.02.130 Prisoner/Parolee Grievances and the rejection is upheld at Step II.

Warden's Signature



Date

MR/MB

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STATE OF MICHIGAN
DEPARTMENT OF CORRECTIONS
LANSING

GRETCHEN WHITMER
GOVERNOR

HEIDI E. WASHINGTON
DIRECTOR

B244

STEP III GRIEVANCE DECISION

Rec #: 126060
27D

To Prisoner:	Stovall	#:	228511
Current Facility:	KCF		
Grievance Identifier:	KCF-21-03-0151-27D		
Step III Received:	4/12/2021		

Your Step III appeal has been reviewed and considered by the Grievance Section of the Office of Legal Affairs in accordance with PD 03.02.130, "Prisoner/Parolee Grievances".

THE REJECTION IS UPHELD.

THIS DECISION CANNOT BE APPEALED WITHIN THE DEPARTMENT. JUL 13 2021

[signature]

Richard D. Russell, Manager Grievance Section, Office of Legal Affairs

CC: Warden, Current Facility:
Warden, Grieved Facility: KCF

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MICHIGAN DEPARTMENT OF CORRECTIONS
4835-4248 5/09
CSJ-247B

PRISONER/PAROLEE GRIEVANCE APPEAL FORM

Date Received by Grievance Coordinator at Step II: ________

Grievance Identifier: KCF 21 03 0174 27D

INSTRUCTIONS: THIS FORM IS ONLY TO BE USED TO APPEAL A STEP I GRIEVANCE.
The white copy of the Prisoner/Parolee Grievance Form CSJ-247A (or the goldenrod copy if you have not been provided with a Step I response in a timely manner) **MUST** be attached to the white copy of this form if you appeal it at both Step II and Step III.

If you should decide to appeal the Step I grievance response to Step II, your appeal should be directed to: KCF Warden Office by 3/17/21. If it is not submitted by this date, it will be considered terminated.

If you should decide to appeal the response you receive at Step II, you should send your Step III Appeal to the Director's Office, P.O. Box 30003, Lansing, Michigan, 48909.

Name (Print first, last)	Number	Institution	Lock Number	Date of Incident	Today's Date
Montez Stovall	228511	K.C.F	B-2-44	9-23-18	2-28-21

STEP II — Reason for Appeal

I was denied a fair Parole hearing; I'm serving a parolable life sentence and my youth and mitigating circumstances were not took into consideration by the Michigan Parole members! I remain under the same status as an adult, though the record confirms that I was a juvenile during the commission of my crimes Other juvenile offenders serving life are receiving fair and differential treatment. I provided the board with information showing home placement, employment, clothing, and mental health treatment, yet still my constitutional rights are being violated!!

STEP II — Response

Date Received by Step II Respondent:

Respondent's Name (Print) | Respondent's Signature | Date 3-22-21

Date Returned to Grievant: 3/23/21

STEP III — Reason for Appeal

Please take notice that this grievance is a due process claim. Grievant MONTEZ ANTHONY STOVALL protest the Michigan Parole Board philosophy and practice of "life means life" and how it is being applied to HIM; who was a juvenile offender during the commission of these crimes. The board's practices are contrary to the Federal and State Constitution and statute that was established retroactively IN Montgomery v. Louisiana, 136 S.Ct. 718; 193 L.Ed 2d 599 (2016) ruling.

NOTE: Only a copy of this appeal and the response will be returned to you.

STEP III — Director's Response is attached as a separate sheet.

DISTRIBUTION: White - Process to Step III; Green, Canary, Pink - Process to Step II; Goldenrod - Grievant

isoner Name: Jones Number: 243436 Lock: B-2-7

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Michigan Supreme Court E-filing Request

Prisoner's requesting to e-file their Criminal Leave to Appeal and/or related documents to the Michigan ıpreme Court must fill out this request completely and make sure their documents comply. This request must be ıbmitted along with any documents to be e-filed with the Michigan Supreme Court, or the request will be denied.

heck a box for each item

ompleted Not Applicable

Pro Per Application for Criminal Leave to Appeal is filled out completely

Related documents are included (see Cover Letter): Amicus Brief

All staples are removed.

All documents are singled-sided.

All documents are on 8.5 x 11 full-sized sheets of paper.

All documents are legible.

3y signing below the prisoner acknowledges they have complied with the above checklist, that they must retain the locuments filed in its original form and produce them at a later time if ordered by the Court, and that any necessary iling fees must be paid within 10 days of electronic filing.

22 : Total number of pages being submitted for E-Filing

Prisoner Signature: Arthur J. Jones Date: 12/15/21

For Staff Use Only

	Staff Initials	Date	Received by Prisoner Prisoner Initials	Date
Prisoner kite received:				
Document Transmitted:				
Confirmation receipt:				
Notice of Rejection or Notice of Electronic Filing:				