

SUPREME COURT STATE OF NEW YORK
COUNTY OF NEW YORK

The People of the State Of New York,
Ex rel. MIGUEL De Los Santos,

Certified Mail Return Receipt
7007 2680 0001 1066 9452

Petitioner,

Index No. 18-1143
May 2, 2018

JAMIE LAMANNA, SUPERINTENDENT,
SHAWANGUNK CORRECTIONAL FACILITY

Respondent,

REPLY BRIEF ON BEHALF OF PETITIONER Miguel De Los Santos.

Relator is entitled to immediate release, this habeas Corpus is based on 2017 review by Honorable Judge Robert G. Bogle, which the relator is entitled to immediate release upon the ground that accusatory instrument filed with the court is insufficient to confer jurisdiction to issue warrant of arrest.

Honorable judge Robert G. Bogle, is a Nassau county court judge and acting New York State Supreme Court justice. He is also the supervising judge of the Nassau county Town and Village courts. He is a member of the New York State Advisory committee of Judicial Ethics and is a lecturer for the Judicial education program for the Office of court administration. He is the author of "Criminal Procedure in New York".

Relator is actually innocent and relator did not commit any crime and therefore the court was stripped of jurisdiction. Relator was arrested illegally without a valid warrant of arrest ordered by a judge in violation of his U.S. Constitution Fourth amendment rights.

All charges based on prosecutor's theory are out of context (Refer Exhibit A). Prosecutor's Key witness Wilson Gonzalez, totally contradicted prosecutor's theory and established that relator did not commit any crime.

This habeas corpus case is being seen and reviewed by millions of people around the world. (Refer, MigueldelosSantos.com). Our courts and our judges are honorable and corruption has no place in our courts. Public interest is that justice be propelly served and our justice cannot be sacrificed for nothing.

Wherefore, your petitioner prays that a Writ of Habeas Corpus be issued, directed to JAMIE LAMANNA, Superintendent of Shawangunk Corr. facility or whosoever may have custody of Miguel delos Santos, the relator herein, commanding him/her to produce the body of the said Miguel delos Santos, before this court justice Hon. James P. Gilpatric, J.S.C., at 9:30 in the forenoon at his chambers in the Ulster County Courthouse, located at 285 Wall street, Kingston N.Y. 12401-0906, for a hearing and examination determining the legality of the confinement of Miguel delos Santos.

Dated: May 28, 2018.
Wallkill, N.Y.

Miguel delos Santos
Petitioner Pro Se
Shawangunk Corr. Fac.
P.O. Box 700
Wallkill, N.Y. 12589

cc/ Jamie Lamanna, Superintendent
Shawangunk Corr. Facility

Beatrice Havranek, County Attorney
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Kingston, N.Y. 12402-1800