

NOT FOR PUBLICATION

In the
United States Court of Appeals
For the Eleventh Circuit

No. 26-10542
Non-Argument Calendar

UNITED STATES OF AMERICA,

Plaintiff-Appellee,

versus

JIMMY COBB,

Defendant-Appellant.

Appeal from the United States District Court
for the Middle District of Georgia
D.C. Docket No. 4:17-cr-00051-CDL-AGH-1

Before LUCK, LAGOA, and DUBINA, Circuit Judges.

PER CURIAM:

Appellant Jimmy Cobb, a former federal prisoner who has fully served his sentence for one count of the use of facilities in in-

terstate and foreign commerce to transmit information about a minor, in violation of 18 U.S.C. § 2425, appeals the district court's order denying his pro se petition for a writ of error coram nobis. On appeal, he argues that the conduct to which he pled guilty, namely, communicating with an undercover officer posing as a minor for purposes of engaging in commercial sexual activity, falls outside the scope of § 2425, and Cobb asserts that the application of this statute to his conduct exceeded congressional intent. He also argues that his guilty plea was supported by an inadequate factual basis under Federal Rule of Criminal Procedure 11(b)(3). Having reviewed the record and read the parties' briefs, we affirm the district court's order denying Cobb error coram nobis relief.

I.

We review for abuse of discretion a district court's denial of a petition for writ of error coram nobis. *Ramdeo v. United States*, 136 F.4th 1348, 1350 (11th Cir. 2025) (citing *Alikhani v. United States*, 200 F.3d 732, 734 (11th Cir. 2000)). We liberally construe a pro se litigant's pleadings, holding them "to less stringent standards than formal pleadings drafted by lawyers." *Campbell v. Air Jam. Ltd.*, 760 F.3d 1165, 1168 (11th Cir. 2014). We also liberally construe briefs filed by pro se litigants; however, issues not briefed on appeal by a pro se litigant are deemed abandoned, and "we do not address arguments raised for the first time in a pro se litigant's reply brief." *Timson v. Sampson*, 518 F.3d 870, 874 (11th Cir. 2008).

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The All Writs Act, 28 U.S.C. § 1651, gives federal courts authority to issue writs of error coram nobis. *United States v. Mills*, 221 F.3d 1201, 1203 (11th Cir. 2000). “The writ of error coram nobis is an extraordinary remedy of last resort available only in compelling circumstances where necessary to achieve justice.” *Id.* A writ of error coram nobis offers a remedy “to vacate a conviction when the petitioner has served his sentence and is no longer in custody, as is required for post-conviction relief under 28 U.S.C. § 2255.” *United States v. Peter*, 310 F.3d 709, 712 (11th Cir. 2002). Specifically, it offers the remedy of vacating a conviction because of the lingering results of convictions, including implications for civil rights or heavier penalties for subsequent offenses. *Id.*

The writ, however, may issue only when (1) there is, and was, no other relief available, and (2) “the error involves a matter of fact of the most fundamental character which has not been put in issue or passed upon and which renders the proceeding itself irregular and invalid.” *Alikhani v. United States*, 200 F.3d 732, 734 (11th Cir. 2000) (quotation marks omitted). Coram nobis “may not issue when alternative remedies, such as habeas corpus, are available.” *Ramdeo*, 136 F.4th at 1352 (quotation marks omitted).

In addition, as the Supreme Court noted in *Sanders v. United States*, 373 U.S. 1, 15-16, 83 S. Ct. 1068, 1077-78 (1963), the resolution of a claim on collateral review is controlling in a later collateral proceeding if “(1) the same ground presented in the subsequent application was determined adversely to the applicant on the prior application, (2) the prior determination was on the merits, and (3)

the ends of justice would not be served by reaching the merits of the subsequent application.” *Id.* at 15, 88 S. Ct. at 1077. The Supreme Court imposed on the petitioner the burden to show that relitigating a previously rejected claim would serve the ends of justice. *Id.* at 17, 88 S. Ct. at 1078.

III.

The record demonstrates that the district court did not abuse its discretion in denying Cobb’s coram nobis petition because alternate relief was available to Cobb. The issue he raised in his coram nobis petition—that his guilty plea to a violation of 18 U.S.C. §2425 was invalid because the conduct to which he admitted in his plea agreement is not a crime—was presented in his prior § 2255 motion to vacate. The district court denied him relief on this claim in his prior habeas corpus proceeding. Cobb fails to show that the ends of justice would be served by relitigating that previously resolved claim. Thus, coram nobis relief is not warranted.

Based on the aforementioned reasons, we affirm the district court’s order denying Cobb coram nobis relief.

AFFIRMED.