IN THE SUPREME COURT OF FLORIDA

CARLOS CELSO CRUZ,
Petitioner,

v.

THE FLORIDA BAR,
Respondent.

CASE NO. 67,309

BRIEF OF PETITIONER

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INTRODUCTION

The Petitioner, having been the Respondent below, will at all times herein be referred to as the Petitioner.

The Respondent, having been the Petitioner below, will at all time herein be referred to as The Florida Bar.

The letters "R of R", followed by the date and page number, will be used to describe all references to the Report of Referee dated November 26, 1985.

The letters "TR", followed by the date and page number will be used to describe references to transcripts of proceedings.

The letters "G.J.-P", followed by the page number will be used to describe all references to the grand jury testimony of Warden Lawrence Putman.

The letters "G.J.-C',followed by the page number will be used to describe all references to the grand jury testimony of the Petitioner.

The letters"OA", followed by a number, will be used to describe all references to the Overt Acts cited in the Indictment, the number being the number assigned to the Overt Act in the Indictment itself.

POINTS INVOLVED ON APPEAL

POINT I

WHETHER OR NOT THE REFEREE WAS BARRED FROM HEARING TAPES AND OTHER EVIDENCE WHEN THE EVIDENCE WAS BEING PRESENTED NOT TO SHOW ERROR IN THE CONVICTION, BUT THE DEGREE OF INVOLVEMENT BY THE PETITIONER IN THE CRIME ITSELF.

POINT II

WHETHER OR NOT THE REFEREE ERRED IN DETERMINING THAT THE CONVICTION OF BRIBERY, IN ITSELF, WAS SUFFICIENT GROUNDS FOR DISBARMENT ALTHOUGH ALL THE EVIDENCE PRESENTED BEFORE THE REFEREE INDICATED THAT A LESSER SANCTION WOULD HAVE BEEN MORE APPROPRIATE.

STATEMENT OF THE CASE

This is a case involving the question of whether or not a Referee at Disbarment Proceedings is barred from hearing mitigating evidence by a Respondent who is trying to prove that although convicted of Bribery, his involvement in the bribery was such that a sanction other than disbarment would be more appropriate.

It is maintained by THE FLORIDA BAR (and followed by the Referee) that allowing a Respondent at disbarment proceedings to present evidence of the extent of his involvement in the offense charged would be granting that Respondent a "trial de novo" which is contrary to this Court's decision in THE FLORIDA BAR v. VERNELL, 374 So. 2d 473 (Fla. 1979). It is further maintained by THE FLORIDA BAR that the bribery conviction is in itself grounds for disbarment, even though evidence of a mitigating nature was not allowed at the proceedings.

The Petitioner maintains that the bribery conviction is not in itself grounds for disbarment, and that evidence presented by a Respondent at Disbarment Proceedings which are mitigating in nature, to show that a less severe sanction would be more appropriate, should be allowed. It is the Petitioner's contention that the Referee erred in not allowing evidence of mitigating factors, as well as having erred in imposing too severe a sanction based on that evidence which was presented.

STATEMENT OF THE FACTS

On November 26, 1985, following a Hearing before a Referee on a Motion by The Florida Bar for disbarment of the Petitioner, it was recommended by the referee that the Petitioner be disbarred from The Florida Bar. The following facts lead up to this Appeal:

1. On December 15, 1982, the Petitioner, then the United States Marshal for the Southern District of Florida, was Indicted by a federal grand jury for Conspiracy to Commit Bribery, a violation of Title 18, United States Code.

2. The overall allegations in the Indictment were that the Petitioner, along with Mr. Seymour Klosky (then the Regional Director of the South Florida Region of the Florida Secretary of State's Office) and Mr. Merle Alan Gottlieb, had conspired to bribe Warden Lawrence Putman (the Warden at the Metropolitan Correctional Center (MCC) a federal prison in Miami, Florida) in order to gain special privileges for Marc Gottlieb (a prisoner at the MCC and son of Merle Alan Gottlieb). See, Indictment.

3. The specific overt acts accredited to the Petitioner in the Indictment are as follows:

A. The Petitioner introduced Warden Putman to Mr. Klosky on September 13, 1982, and they discussed obtaining a furlough for Marc Gottlieb. (O.A. 1)

B. On October 8, 1982, the Petitioner and Warden Putman discussed having Marc Gottlieb designated to the MCC from a federal prison in Tallahassee, Florida. (O.A. 4)

C. On October 8, 1982, the Petitioner counseled Warden Putman to accept the offer of a cruise from Mr. Klosky. (O.A. 5)

D. On October 20, 1982, the Petitioner met with Warden Putman and Mr. Klosky at a restaurant (O.A. 7)

E. On November 5, 1982, the Petitioner told Warden Putman that he would speak to Mr. Klosky on Warden Putman's behalf. (O.A. 13)

F. On November 5, 1982, the Petitioner sent a letter to U.S. District Court Judge Norman Ruttger in support of Marc Gottlieb's Motion for Reduction of Sentence. (O.A. 14)

G. On November 8, 1982, the Petitioner met at a restaurant with Mr. Klosky and Mr. Gottlieb. (O.A. 15)

H. On December 8, 1982, the Petitioner met with Warden Putman at a restaurant. (O.A. 23)

4. The remaining overt acts of the indictment which do not mention the Petitioner are as follows:

A. On October 5, 1982, Warden Putman and Mr. Klosky met at a restaurant to discuss designation of Marc Gottlieb to the MCC from a federal prison in Tallahassee, Florida. (O.A. 2)

B. On October 5, 1982, Mr. Klosky offered Warden Putman cruise tickets and United States Currency. (O.A. 2)

C. On October 13, 1982, Mr. Klosky met Warden Putman at a restaurant and offered to inquire about obtaining an automobile for Warden Putman. (O.A. 6)

D. On October 29, 1982, Mr. Klosky asked Warden Putman to send a letter in support of Marc Gottlieb's Motion for Reduction of Sentence. (O.A. 8)

E. On October 29, 1982, Mr. Klosky gave Warden Putman $200.00 in U.S. currency. (O.A. 9)

F. On October 29, 1982, Mr. Gottlieb met with Warden Putman and Mr. Klosky. (O.A. 10)

G. On November 3, 1982, Mr. Klosky gave Warden Putman $300.00 in U.S. currency. (O.A. 12)

H. On November 3, 1982, Mr. Klosky asked Warden Putman to grant Marc Gottlieb furloughs and to place him in a work release program (O.A. 11)

I. On November 18, 1982, Mr. Gottlieb and Mr. Klosky promised Warden Putman an automobile. (OA.16)

J. On November 18, 1982, Mr. Klosky gave Warden Putman $300.00 in U.S. currency. (O.A. 17)

K. On November 19, 1982, Mr. Klosky told Warden Putman that a leased vehicle would be provided to him. (O.A. 18)

L. On November 22, 1982, Mr. Klosky drove Warden Putman to a leasing establishment to obtain a leased vehicle. (O.A. 19)

M. On November 23, 1982, Mr. Klosky told Warden Putman that an automobile would be delivered to him. (O.A. 20)

N. On November 30, 1982, Mr. Klosky and Mr. Gottlieb met with Warden Putman. (OA. 21)

O. On November 7, 1982, Mr. Gottlieb promised Warden Putman to give Warden Putman an automobile before December 9, 1982. (O.A. 22)

P. On December 9, 1982, Mr. Gottlieb gave Warden Putman a 1981 Chevrolet Malibu.

5. During this entire period Warden Putman was a witness for the state and the conversations were taped by means of a device attached to Warden Putman's body. These tapes are now in the possession of the federal Bureau of Investigations and were to have been or have been made available to The Florida Bar.

6. One conversation which was not recorded was the initial meeting on September 13, 1982, involving the Petitioner, Warden Putman and Mr. Klosky. Warden Putman testified before a federal grand jury in Miami, Florida that he had written a memorandum that day to record the events that had transpired. He testified that during the meeting a furlough was discussed for Marc Gottlieb and that football tickets had been offered by Mr. Klosky. Also that the future employment plans of warden Putman had been discussed, but that "at no time did I feel that they were related to the question of (Marc) Gottlieb's furlough". (G.J.- P, P9-10)

7. The Petitioner testified before the federal grand jury in Miami, Florida, that he knew that cruise tickets had been offered to him and Warden Putman by Mr. Klosky (G.J.-C, P42-44) and that Disney World tickets had been offered to him by Mr. Klosky (G.J.-C, P55). Also that he knew that Warden Putman was going to receive an automobile through Mr. Klosky at dealer's price (G.J.-C, P53). The Petitioner denied that any of these offers had any connection with inmate Marc Gottlieb. (G.J.-C, P50-51)

8. On December 16 or 17, 1982, the Petitioner's attorney, Jon W. Burke, was seen at a restaurant by Mr. Gottlieb. Mr. Gottlieb approached Mr. Burke and stated to Mr. Burke: "Please tell Carlos that I'm sorry about what happened. That as far as I'm concerned he had nothing to do with this". Although undocumented, this conversation was reported to the Petitioner by Mr. Burke and was related to several other persons at Mr. Burke's office. To this date Mr. Gottlieb has not said anything detrimental about the Petitioner although Mr. Gottlieb was sentenced to prison himself.

9. At another date prior to the Indictments, agents from the Federal Bureau of Investigations confronted Mr. Klosky with the evidence against him, and sought Mr. Klosky's testimony in exchange for leniency on his behalf. Although

undocumented, it has been reported that Mr. Klosky was specifically asked to produce evidence against the petitioner. Mr. Klosky could not produce evidence against the Petitioner and, to this day, has not said anything detrimental concerning the Petitioner, even though Mr. Klosky was also sentenced to serve a prison term.

10. The Petitioner was indicted and tried for the offense. On April 15, 1983, the Petitioner stopped the trial proceedings and changed his plea from Not Guilty to Guilty. It is on the basis of what transpired that day that the Petitioner is now seeking a review of the full record in order to show that his plea was involuntary due to mental incompetence and that the record would show that his involvement was so minimal that disbarment would not be warranted. The Petitioner has agreed that he has plead guilty to the charge and that he was convicted following the plea. The Petitioner has, however, denied that he has committed an act involving moral turpitude which would warrant that disbarment. The following has been presented or is being presented in support of that argument:

A. Testimony by Judge William Hoeveler, U.S. District Court Judge.

" I always wondered whether or not he should have continued, but he didn't. He pled guilty and, finally, he did say that he knew that what he was doing was wrong. This was hard coming from- it was hard to get that from Mr. Cruz" (TR, 10/18/85, P34)

" It was not an easy plea..Mr. Cruz was- when he got to the point of, are you willing to admit that you are guilty or are you willing to admit that what you did was against the law, he had a lot of concern about whether or not he could and should admit. I think, again, if I remember correctly, there was one occasion when I refused

to take it. There may have been more than one. (Id, at 30)

" I don't mean to suggest that he was being difficult. I think he really had a difficult time admitting that what he was doing he knew was against the law". (Id, at 41)

" Nobody accused him of taking anything". (Id, at 39)

" He never received anything. Nobody ever proved that he received a dime from anybody". (Id, at 32)

" What he did was a gross error in judgment. I think that he let himself be connived by this fellow Klosky for whatever reason, I don't pretend to know. He became kind of a vehicle for the perpetration of this. I would say that he was more of an aider and abettor really than a conspirator, in the strict sense of the word" (Id, at34-35)

" My experience with him, from talking to him, he is essentially a very good person. He is religious. Everyone who testified about him, who came to his sentencing, and people I have heard from before and after, suggest that he is a very decent individual and he is not a criminal". (Id, at 34-35)

" as I said before, he is basically a decent, God-fearing man. I haven't much of a question about that". (id, at 44).

The following question was posed by the Referee:

"Q. I don't mean to make you uncomfortable, but if you felt this way, why was it that you imposed the sentence that you did?"

"A. It's hard for me to analyze now. A year and a day, actually for a case like this- I must confess that the notoriety of the case had something to do with it. It's unfortunate, but sometimes it does". (Id, at 36-37)

B. Testimony by Mr. George Thompson, former U.S.

Probation Officer, the pre-sentence investigator for Judge Hoeveler.

" ...in my dealings with Mr. Cruz, I had some reservations as to whether or not, in his own mind, he felt he was really guilty... I still wonder how guilty he really feels he was...

" I did go through all of them, I listened to the tapes, read the transcripts...

" I think too often people just read the transcripts and the transcripts, themselves, can seem very damaging. When you listen to the tapes along with the transcripts and try to picture in your mind the scenario of what was actually going on in the room, you get a different picture of it.

"...the tapes were made in Mr. Cruz' office and, as I recall, Mr. Cruz generally was there, from what I could gather, at his desk working and Mr. Putman was in the office basically carrying on the conversation...it appeared as though he was basically sitting and working and agreeing with what Warden Putman was saying". (TR. 10/18/85, P50-51)

" The Government felt that Mr. Cruz was a heinous offender because of the charge of bribery and I had a problem with that...with what I consider the mitigations of how he got himself involved and his actual activities during the conspiracy, itself, I certainly don't feel that it warranted the type of sentence that the Government was advocating". (Id, at 52)

11. The Petitioner has presented the following in support of the contention that his plea was involuntary because of mental incompetence at the time he pled guilty:

A. Dr. Anthony Ballard, Orthopedic Surgeon at Jackson Memorial Hospital. Dr. Ballard's

testimony was presented by Affidavit at a Hearing held before Judge Hoeveler on July 23, 1983, on a Motion to Set Aside Guilty Plea presented by the Petitioner. Dr. Ballard's entire Affidavit accompanies this Brief, excerpts are quoted herein. The Affidavit states that he was called to the Petitioner's home because of the Petitioner's "disturbed, depressed and anxious state". That he observed the Petitioner during a two-hour period "as he struggled with attempts to make a decision as to what course of action he should follow when he appeared at a hearing on the morning of April 15, 1983. His decision making process appeared to be considerably impaired and in direct contrast to that which I had observed on all previous occasions... During the Course of the several hour period of time that we were together, he seemed entirely incapable of weighing the pros and cons of each course of action in any objective manner. He seemed to be physically and emotionally exhausted, as was evidenced by his rambling, disjointed statements, interspersed with periods of crying...Prior to my departure I gave Mr. Cruz one (1) capsule containing 25 mg. of Benadryl". (TR. 7/23/83, P28-30)

B. Blaine Johnson, President of the Miami Florida Stake of The Church Of Jesus Chist of Latter-Day Saints, testified at that Hearing that he had gone to the petitioner's home with Dr. Ballard. Asked if he had seen the Petitioner receive any medication, he testified as follows:
" Yes. He gave him a small capsule just prior to our leaving and suggested he take it...I don't recall exactly, but approximately one o'clock". (TR. 7/23/83, P 32)

C. Mrs. Maria A. Cruz, the Petitioner's wife,

testified at that Hearing as follows:
" Q. Were you present in the room when certain medication was given to Carlos Cruz by Dr. Ballard?
" A. Yes.
" Q. Were you present when Carlos Cruz drank that medication?
" A. Yes." (TR. 7/23/83, P 36)

D. Cesar C. Cruz, the Petitioner's brother, testified at that Hearing as follows:
"...I was told that he had been medicated; that he had Benadryl; that he had taken Extra Strength Tylenol; that he had taken aspirin before that..." (TR. 7/23/83, P 51)
The following questions were made to him:
" Q. Would you describe Mr. Cruz' appearance at the time he left on the morning of April the 15?
" A. He was exhausted, very tired..." (Id, at 48)
" Q. Did you see any change in his condition as opposed to when you left the night before?
" A. Very definitely. The man I had left was just rambling and incoherent, if I may use that word, and the gentleman that I picked up was very different. He was in a stupor like, yes. There was a difference." (Id, at 49-50).

E. Dr. Andres Candela, an internist and gastro-enterologist, who had been the Petitioner's physician on earlier occasions, testified at that Hearing as follows:
" Mr. Cruz told me that on the day I already mentioned he took- number one, he is suffering from severe headache, and he took several aspirin totaling almost eight aspirin.
" Then throughout the night the headache was so severe that he took Tylenol extra strength; on

two occasions two more. In other words, he took a total of four, at least. Then he was unable to sleep.

" He was under a lot of stress and tension, and he took Benadryl, a twenty-five milligram capsule early in the morning. It was like 5:00 a.m. Let me put it that way, and I should say, also, that Mr. Cruz--and this is also in the chart--he is the kind of person he never takes any medication or any drug or any tranquilizers, you know..." (TR. 7/23/83, P 14)

" The combination of all the medication in Mr. Cruz, within medical possibility, is that he may become, number one, drowsy in such a way he will be incapable of controlling his intellectual capabilities.

" He will be like in a daze, you know. In other words, he won't be himself because he will be under the effect, the additive effect of the medicine, the Tylenol, the aspirin and the Benadryl" (Id, at 16)

" The probable effect would be drowsiness, sleepiness; sort of in a state of a daze, of cloudiness that he won't have complete control of all his intellectual capabilities to make a decision..." (Id, at 20).

F. The Petitioner was interviewed by the news media about two hours after entering the guilty plea. His comment at that time was:

" In the eyes of the law, I am guilty. In my own mind, I don't think I did anything wrong. I don't think I did anything wrong in the eyes of the Lord." Miami herald, 4/16/83, Sec. B, P1-2)

12. The Petitioner's Motion to Set Aside the Guilty Plea was denied. The trial was never resumed. The guilty plea stood. The Petitioner at the Hearing before the referee

on The Florida Bar's Motion for Disbarment, argued that although he had pled guilty to the charges, this was not grounds in itself for disbarment. He sought to present the tapes and other evidence in support of his contention that his involvement in the crime itself was minimal, at best. The below comments were made by the Referee during that Hearing:

> " I want to listen to the tapes. It is going to take me some time to listen to those... I will have to do this after hours, but I will listen to all the tapes." (TR. 10/18/85, P 95)

13. The following ruling by the Referee presents the basis for this Appeal:

> " The undersigned referee originally wanted to listen to certain tapes that were involved in this case. Record, Pages 95-99. however, after due consideration, this referee changed her mind and decided not to listen to said tapes. After reading The Florida Bar v. Vernell, 374 So. 2d 473 (Fla. 1979), it is apparent that this Referee cannot 'go behind the convictions'. Therefore, no useful purpose would be served by listening to the tapes". (R of R, P 2)
>
> " Although Mr. Cruz contends he was really not guilty of bribery, this referee cannot 'go behind the convictions'. Therefore, the undersigned must assume that Mr. Cruz was guilty of the charges of which he was convicted". (Id, at 3)

ARGUMENT

POINT I

THE REFEREE WAS NOT BARRED FROM HEARING THE TAPES AND OTHER EVIDENCE TO SHOW THAT ALTHOUGH CONVICTED, THE PETITIONER'S INVOLVEMENT IN THE CRIME WAS SUCH THAT A SANCTION OTHER THAN DISBARMENT WOULD BE MORE APPROPRIATE.

The argument presented by The Florida Bar, and agreed to by the Referee, is that once convicted, "neither the Referee nor the Supreme Court of Florida has a right to go behind the Federal conviction and he is not entitled to a trial de novo". (TR., 10/18/85, P 7). As support for its argument The Florida Bar cited The Florida Bar v. Vernell, 374 So. 2d 473 (Fla. 1979). This conclusion, if correct, would mean that a conviction of Bribery, regardless of the circumstances, would be grounds in itself for disbarment, without any recourse by the accused to evidence to show that his involvement was such that a lesser sanction would be more appropriate. It is the Petitioner's contention that this is not the holding in Vernell.

Vernell had been previously found guilty of failing to file income tax reports for the years 1967-1971. He is now being disciplined for a new violation of the Code of Professional Responsibility of the Florida Bar and was being disciplined as a repeat violator of the Rules. Vernell argued that the prior conviction was erroneous and should not have been made a part of the present charges. He sought to re-open the case to show that the conviction was erroneous. This Court held that Vernell was not entitled to do so for the purpose of showing that the conviction was erroneous.

The Petitioner here has not claimed that the conviction was erroneous. He has sought to introduce certain evidence which would have been presented at the trial but which was not presented after the Petitioner pled guilty to the charges. The Petitioner sought to present the evidence merely to show that his involvement in the offense was such that a sanction other than disbarment would be much more appropriate.

The Supreme Court of Florida has always been receptive to mitigating evidence, and did not bar such evidence by its holding in Vernell. The Florida Bar has cited the cases of The Florida Bar v. Riccardi, 264 So. 2d 5 (Fla. 1972) and The Florida Bar v. Craig, 238 So. 2d 78 (Fla. 1970). These cases, if anything, prove that the Supreme Court of Florida differentiates according to the mitigating factors and is receptive to such evidence. In each case the lawyer had been accused of bribery. In Riccardi the lawyer was disbarred, while in Craig the lawyer was suspended. The Court noted in Riccardi that it was not inclined to leniency in bribery matters "absent mitigating factors in the individual case".

In Vernell, re-opening the case would have been tantamount to "going behind the conviction". In the present case, as in other cases where the Court looks at mitigating evidence, the Court is not going "behind" the convictions, but "beyond" the convictions.

The conclusion by The Florida Bar that neither the Referee nor The Supreme Court of Florida has a right to go behind the federal conviction is, therefore, out of context in this case, and the Referee should have been allowed to hear the tapes and read the transcripts in order to determine whether or not a sanction other than disbarment would suffice.

POINT II

DISBARMENT IS NOT AN APPROPRIATE SANCTION BASED ON THE EVIDENCE OF MITIGATING FACTORS PRESENTED BEFORE THE FLORIDA BAR.

The Referee stated in her Report that " after considering all the pleadings, the testimony and the evidence before me..."(R of R, P 1) it was her recommendation that the Petitioner be disbarred. It is the Petitioner's contention that the evidence presented did not warrant disbarment.

The pleadings merely show that the Petitioner was

convicted following an indictment and guilty plea. The evidence and testimony, however, were all favorable to the Petitioner.

The Petitioner testified before the Referee as well as before the federal grand jury, that he knew of certain offers having been made, but that these offers were not made in connection with the bribe. This testimony is substantiated with the testimony given to the federal grand jury by Warden Putman, when he testified that these offers were made at the initial meeting and that he did not think they were related to the bribe itself.

The Petitioner testified that he knew that the Warden had received a car at dealer's price, but this was only known to the Petitioner after the Warden himself brought him the car to see it. No evidence was ever presented to show that the Petitioner knew of this beforehand, or that he had conspired to give the Warden the automobile.

The Indictment which was presented as evidence showed an elaborate conspiracy to bribe the federal warden, but none of the overt acts mentioned, other than that the Petitioner counseled the Warden to take the offer of the cruise, were charged against the Petitioner. The Indictment did show that money and other gifts were given to the Warden, but not by the Petitioner or with the knowledge of the Petitioner.

The testimony presented to the Referee was from Judge William Hoeveler (the presiding Judge), Mr. George Thompson (the pre-sentence investigator) and Mr. Amado Leon (the Petitioner's Bishop). All of the testimony was very favorable to the Petitioner. There was no testimony presented against the petitioner by any other witness.

Briefly, the testimony of Judge Hoeveler was that the Petitioner "is essentially a very good man" (Supra, at x); "he is a very decent individual and he is not a criminal" (Supra, at x); "Nobody accused him of taking anything" (Supra, at x); "What he did was a gross error in judgment" (Supra, at x); " I would say that he was more of an aider

and abettor really than a conspirator, in the strict sense of the word" (Supra, at x); " I always wondered whether or not he should have continued, but he didn't" (Supra, at ix).

Mr. Thompson testified that "with what I considered the mitigations of how he got himself involved and his actual activities during the conspiracy, itself, I certainly don't feel that it warranted the type of sentence that the Government was advocating" (TR. 10/18/85, P 52). " I would certainly like to see him have the opportunity to carry out- his being an attorney again" (Id, at 55-56).

Bishop Leon testified that the Petitioner has " a good heart", that "he worries about the community, the kids". That the Petitioner was a Scout Master and is now a Cub Master. That he is "a very good father". That he teaches "the kids to pray". That the Petitioner is one who works "from 9:00 o'clock in the morning to 11:00, 12:00 in the night, every single day". (TR. 10/18/85, P62-63).

It is the Petitioner's contention that the only evidence against him is the conviction itself, and that the testimony presented shows that the three years suspension from the Florida Bar which the petitioner is now serving is more than sufficient punishment for the acts which he committed. The Referee, therefore, erred in recommending disbarment of the Petitioner.

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies hereof have been furnished to The Florida Bar, C/O Mr. Paul A. Gross, Bar Counsel, at Suite 211, Rivergate Plaza, 444 Brickell Avenue, Miami, Florida 33131, by personal delivery on this 27th day of January, 1986.

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