DA 12-7-89

027

No. 71,540

IN THE SUPREME COURT OF THE STATE OF FLORIDA

ALPHONSO GREEN,

Appellant,

v.

STATE OF FLORIDA,

Appellee.

REPLY BRIEF OF APPELLANT

Appeal from A Judgment And Two Sentences
Of Death Entered By The Circuit Court Of
The Thirteenth Judicial Circuit

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I THE TRIAL COURT PERMITTED BLACK MEMBERS OF THE VENIRE TO BE CHALLENGED FOR REASONS NOT NEUTRAL AS TO RACE WHICH CONSTITUTED PRETEXTS,

The state's answer brief erroneously begins its analysis of Appellant's issue under State v. Neil, 457 So.2d 481 (Fla. 1984) by arguing that the trial judge can best determine whether actual bias exists during jury selection. (Answer Brief, at 21) Since Mr. Green's initial brief does not allege actual bias by the twelve whites selected for his trial, State v. Williams, 465 So.2d 1229 (Fla. 1985) has no application to this case. Williams simply determined that a corrections officer should not automatically be challenged for cause in a trial involving the charge of battery on a corrections officer.

Mr, Green's attack on the jury selection process questions the state's motive for challenging two black members of the venire, The record clearly reflects that the reasons found acceptable by the trial court were not applied in a race-neutral manner. The record also establishes that the reasons accepted by the trial court were mere pretexts utilized by the state to ensure an all-white jury. Since neither black woman challenged by the state held a view that would substantially impair her performance, People v. Johnson, 767 P.2d 1047 (Cal. 1989) has no more application to this case than does Williams.

The state interprets Ms. Rollins' remarks during voir dire as meaning she did not want to serve as a juror. (Answer brief, at 3) Actually, Ms. Rollins' remark in response to a question on whether she was willing to serve apparently was an expresion of ambivalence toward the death penalty, not unwillingness to serve, viz:

> Q Now, Ms. Rollins, would you want to serve on this jury if you were selected?
>
> A (Juror No. 18) I don't feel like it. I don't know if I'm for it or against it. I'm in the middle. (R221)

In any event, the state did not raise her alleged unwillingess to serve as a reason for challenging her in the trial court. It does so only on appeal. Since the prosecutor's reasons form the crux of justifying a challenge, other possible bases in the record provide no relief to the state. Kibler v. State, __So.2d__, __, 14 FLW 291, 293 (Fla. 6-15-89).

The state also attempts to justify the exclusion of Ms. Rollins on the basis that she was opposed to the death penalty. She said she did not believe the death penalty deterred crimes, but she agreed it eliminated the risk of future criminal conduct. (R221) She indicated no opposition to the death penalty, only a lack of faith in its deterrent effect. If the facts warranted it, she said she would follow the law and believed she could impose the death penalty. (R223)

Ms. Mallory, a white woman selected as a juror, told Mr. Page during voir dire that she would not impose the death penalty unless the offense were proven to her "beyond a shadow of a doubt." (R215) After a lengthy discussion, Ms. Mallory, like Ms. Rollins, agreed that she too could follow the law. (R217)

From this sequence the state argues that the challenge of Ms. Rollins due to her opposition to the death penalty was valid. (Answer brief, at 24) Indeed, the state attorney told the trial court he would challenge anyone if he could not "get them ready, willing and able to pull the switch on the person..." (R347) Ms. Mallory's willingness to "pull the switch" appears no greater than Ms. Rollins', though. The different treatments afforded Ms. Mallory and Ms. Rollins conform with the pretexts condemned by this Court in Roundtree v. State, __So.2d__, 14 FLW 337 (Fla. 7-6-89).

The state's argument with regard to the other black woman challenged peremptorily by the state, Mrs. Wessie Brown, is difficult to understand. The state acknowledges that two white men ultimately selected each was acquainted with two potential defense witnesses. (Answer brief, at 25) After defense counsel told the trial court that one of the potential witnesses known to Mrs. Brown would not be called, the trial court permitted her to be challenged for her fami-

liarity with one potential witness. The trial court noted that she said her familiarity with the defense witnesses would not lend any greater weight to their testimony. (R349, 352) Thus, two whites who each knew two defense witnesses were selected while a black who knew one was challenged.

The state attempts to avoid this obvious failure to exercise challenges in a neutral manner by arguing that two of the defense witnesses known by the white jurors did not testify. (Answer brief, at 26) The significance of whether the witnesses eventually testified has no bearing, however, on the purported justification for excusing Mrs. Brown. Only the facts known at the time of jury selection can be considered in determining whether the proffered reason is "race-neutral." Whether the witness eventually testifies is absolutely irrelevant to the question posed to the trial court at the time of jury selection. Kibler, supra.

Finally, the state attempted to challenge Mrs. Brown on the basis that her 16-year tenure in an entry level position reflected a lack of qualifications. (R351) This Court recently found this reasoning inappropriate absent "some showing of a relationship to the case at hand." Reed v. State, __So.2d__, __, 14 FLW 298, 299 (Fla. 6-15-89). None was shown.

Therefore, the state failed the race-neutral test set

forth in State v. Slappy, 522 So.2d 18, 22 (Fla.), cert. denied, __U.S. __,108 S.Ct. 2873 (1988) in at least three respects:

1. No group bias was shown by Mrs. Brown or Ms. Rollins.

2. None of the prosecutors' reasons for striking the two women had any relationship to the facts of the case.

3. The challenges to both women were based on reasons equally applicable to whites who were not challenged. Roundtree, supra.

The error below arose out of two considerations not clarified until the decision in Slappy. First, the trial court overestimated the showing required of the defense. At one point, the trial court wondered aloud how a prima facie showing could be made. (R346-347) Second, when the trial court required the state to make a showing, it clearly accepted any plausible justification the state could advance.

The trial court should have found that the weight of the accepted proffered reasons taken together was undermined by those rejected. Even if the reasons accepted by the trial court were facially sufficient, in other words, they were manifestly insufficient when considered in light of those it rejected. Evaluating the credibility of reasons and the attorney offering them is required by Slappy, 522 So.2d at 22.

The trial court, however, fell prey to the same thinking found unacceptable in Slappy, 522 So.2d at 20. It too erroneously believed it was bound by the state's facially neutral explanations. In response to defense counsel's Neil objections, the trial court found the proper justification "may very well be" (R347) and "might be" (R352) valid reasons for excusing Ms. Rollins and Mrs. Brown respectively. Those expressions fall far short of the findings required under Slappy, which, in all fairness to the court below, was not decided at the time of the trial.

Accordingly, the judgment of the trial court should be reversed and the case should be remanded for a new trial.

II A. THE HEARSAY STATEMENT OF CASSANDRA JONES WENT DIRECTLY TO THE TRUTH OF THE MATTER ASSERTED AND PREJUDICED APPELLAMT'S DEFENSE.

The state's argument regarding the hearsay statements attributed to Cassandra Jones attempts to justify Det. Noblitt's testimony on the basis that it only sought to show why the butcher knife was seized. In attempting to depict Ms. Jones' statement as not being hearsay, the state ignores the relevance of the statement and its obvious import.

An out-of-court statement constitutes hearsay only if it is directed to the truth of the matter asserted. Fraser, Hearsay And The Truth Of The Matter Asserted: An Evidentiary

Island, 58 Fla.B.J. 94 (Feb. '84) The officers' reason for looking in Mr. Green's apartment for the knife constitutes hearsay as it attributes truth--a knife used in the killing could be found there--to unknown persons. However, trial counsel made no objection to Det. Noblitt's statements on this point and it is not an issue in this appeal. Trial counsel did object to the more prejudicial statement attributed to Ms. Jones in which she allegedly identified the knife removed from the apartment by Mr. Green. (R1192)

The cases relied upon by the state address far less prejudicial evidence. 'In Johnson v. State, 456 So.2d 529 (Fla. 4th DCA 1984) the court followed United States v. Walling, 486 F.2d 229, 234 (9th Cir. 1973) in permitting the contents of a police radio dispatch to be introduced for the limited purpose of establishing a sequence of action.

The Fourth District Court of Appeal greatly expanded this concept in Freeman v. State, 494 So.2d 270 (Fla. 4th DCA 1986) by permitting testimony of an informant to explain the officers' going to a certain apartment, where they found drugs. The informant told the police that a man in the apartment had tried to sell drugs to the informant earlier. The defendant was convicted of possessing drugs and paraphernalia. If the informant's statement in Freeman were introduced to prove the defendant attempted to distribute drugs, can anyone reasonably doubt it was hearsay and prejudicial?

The objectionable statement attributed to Ms. Jones sought to prove that Mr. Green removed the knife from the apartment. Without Ms. Jones' statement, Det. Moblitt's reason for seizing the knife was absolutely irrelevant. Accordingly, her statement was directed to the truth of the matter asserted (Mr. Green removed that knife from the apartment) and constituted hearsay. (R1192,1791) Bauer v. State, 528 So.2d 6,7 (Fla. 2d DCA), cause dismissed, 531 So.2d 1355 (Fla. 1988).

The trial court acted properly in repeatedly recognizing Ms. Jones' statements as hearsay and in specifically rejecting Freeman and Johnson as being inapplicable. (R1193) The trial court only erred in denying defense counsel's immediate motion for a mistrial. It apparently refused to do so because the trial was in its seventh day. (R1192)

The state goes on to contend that if the introduction of Ms. Jones' purported statement constituted error, it was harmless. (Answer brief, at 32) The state apparently assumes that Mr. Green's repudiation of his confession would be ignored by the jury. It expects this Court to make the same finding. To do otherwise, the state contends, would be tantamount to this Court's substituting "its judgment for the judgment of the jury." (Answer brief, at 33) Quite the contrary is true. The state actually is asking this Court to accept the

judgment of the jury even though hearsay placed the alleged murder weapon in the hand of the accused.

If the facts in this case were not disputed by Mr. Green, the state's position might have some merit. For the same reason that this Court cannot make credibility choices, it cannot ignore the existence of Mr. Green's recantation of his alleged confession. To do *so* would destroy the harmful error doctrine, deny Mr. Green his right to meaningful appellate review and give the state the unfettered benefit of its error.

Accordingly, the Court should reject the state's contention that the statement attributed by Det. Noblitt and Mr. Page to Ms. Jones was not hearsay or that it constituted harmless error. (R1192,1791) The judgment should be reversed.

B. THE STATE FAILED TO LAY THE PREDICATE FOR THE EXCITED UTTERAIJCE DOCTRINE AS NO EVIDENCE ESTABLISHED ANY TIME FRAME BETWEEN THE ALLEGED THREAT BY MR. GREEN AND THE NICHOLS' COMMUNICATING IT TO THEIR SOM.

The state's argument with regard to the testimony of Mr. Nichols' relating Mr. Green's alleged threat urges that the victims called their son while under the stress of the event. (Answer brief, at 35) Nothing in the record, however, supports this argument or negates the likelihood that the victims became agitated while recounting the alleged conver-

sation after reflection. If so, the alleged threat falls outside the excited utterance exception. State v. Jano, 524 So.2d 660, 663 (Fla. 1988).

The state goes so far as to suggest that the Nichols had no time to contrive or misrepresent the alleged threat and "there was no possibility of misrepresentation." (Answer brief, at 35) The testimony cited in the record of Mr. Jack Britt Nichols does not support this assertion. Mr. Nichols clearly testified that Mr. Green "apparently" made the statement "very soon prior" to his conversation with his parents. (R501) Thus, the record lacks any reasonable specificity as to when the statement allegedly was made in relation to the telephone conversation.

The state attempts to minimize the significance of the time factor by relying on United States v. Moore, 791 F.2d 566, 572 (7th Cir. 1986). Moore holds that the length of time between the event and the statement is important, but not dispositive. In Moore, however, the court found that the time between the discovery of documents by the defendant's secretary and the statement she made to a co-worker apparently did not exceed 30 minutes. The defendant's secretary also remained excited by the find until making the statement. Id.

In this case, by contrast, the state established no reliable time frame. It only relies on the impression received by the Nichols' son. Therefore, the state failed to establish "that the time was sufficiently short under the facts to fall within the limits of the exception" as required by Jano, 524 So.2d at 663. Jano, then, evidently disagrees with Moore by strongly implying that the time factor is important, and, where no time frame is established, dispositive.

The state also attempts to underscore the Nichols' fear of Mr. Green by arguing that the sheriff of Hillsborough County posted the "the eviction notice on October 1, 1986." (Answer brief, at 37) Actually, Mr. Nichols did not know whether his parents or the sheriff served the three-day notice to pay rent required before an eviction complaint can be served under §83.56, Fla. Stats. (1986). (R455) The "eviction notice" described by the state and served on October 1, 1986 actually was the summons and complaint. (State exh. 14-B; R494-498) As interested parties, the Nichols could not serve the summons and complaint regardless of their feelings toward Mr. Green. (F.S.Cl.R. 7.070; Fla.R.Civ.P. 1.070) Thus, the state's reliance on the sheriff's role in the eviction as an indicator of the Nichols' fear lacks any substance.

Finally, the state argues that the "overwhelming evidence" in the case, including Mr. Green's alleged confes-

sion, renders Mr. Nichols' testimony harmless beyond a reasonable doubt. Again, the state ignores Mr. Green's recantation of his alleged confession, which rendered the evidence a good deal less than overwhelming and added significance to the hearsay statements.

Even if the hearsay testimony of Det. Noblitt and Mr. Nichols can be deemed harmless with regard to Mr. Green's guilt, its prejudicial impact as to penalty was enormous. Under the reasoning of Castro v. State, __So.2d__, __, 14 FLW 359, 361 (Fla. 7-13-89), the Court should evaluate the cumulative impact of the hearsay testimony on the penalty phase determination as well as on the question of guilt. Either verdict could have been affected, *so* reversal is required Castro, at__, 360 [citing] Ciccarelli v. State, 531 So.2d 129, 132 (Fla. 1988).

On the basis of the foregoing, Mr. Nichols' statement was hearsay and should have been excluded. The trial court's failure to declare a mistrial should be remedied by reversal.

III THE IMPACT OF MR. GREEN'S CONSIDERING THE INTOXICATION DEFENSE SO TAINTED THE TRIAL THAT THIS COURT SHOULD FIND FUNDAMENTAL ERROR.

The state's argument with respect to the jury's being told of Mr. Green's considering inconsistent defenses apparently misunderstands the significance of this issue.

Essentially, the state argues that his flirtation with the intoxication defense did not prejudice him as he admitted being high on cocaine and alleged that someone else committed the murders. (Answer brief, at 38).

Mr. Green had the right to elect alternative theories of innocence in the trial court. He did not elect alternative theories, however. The defense he attempted to prove relied on the idea that someone else, not he, committed the murders. Under these circumstances, the state had no justification in reaching outside the record and impeaching the theory of Mr. Green's defense with the prosecutor's bald assertion that an alternative theory had been considered.

This is especially true where the alternative theory, intoxication, is a form of insanity. Johnson v. State, 478 So.2d 885 (Fla. 3d DCA 1985), cause dismissed, 488 So.2d 830 (1986). Mr. Page's questions clearly suggested an intention to claim intoxication as an avoidance of liability as opposed to a denial of the crime. (R1653)

The infirmities inherent in the prosecutor's method of impeaching Mr. Green's defense have already been argued in Appellant's initial brief. In addition to the method of impeachment by using facts completely outside the record and possibly untrue, Mr. Green also urges reversal for the impeach-

ment of his defense in the first instance.

To the extent Mr. Green attacks the impeachment of the theory of his defense, this issue appears to be one of first impression in Florida. The novelty of this issue, however, does not detract from its significance. The prosecutor's unfounded attack on the theory of Mr. Green's defense, should be recognized for what it was--prosecutorial misconduct which destroyed Mr. Green's entitlement to a fair trial.

Accordingly, the Court should find that the procedure permitted below constitutes fundamental error and the judgment should be reversed for a new trial.

IV THE TRIAL COURT'S MYRIAD ERRORS DESTROYED MR. GREEN'S RIGHT TO A REASONED PENALTY PHASE.

A. THREE OF THE AGGRAVATING FACTORS FOUND BY THE TRIAL COURT LACK SUPPORT IN THE RECORD.

1. Appellant Made No Statement Indicating An Intention To Commit Murder To Avoid Or Prevent A Lawful Arrest.

The state relies upon Harmon v. State, 527 So.2d 182, 188 (Fla. 1988) to support the trial court's finding that the murders were committed to avoid or prevent a lawful arrest. A close reading of Harmon, however, shows the error in the

trial court's finding.

Harmon relies on Clark v. State, 443 So.2d 973 (Fla. 1983), cert. denied 467 U.S. 1210 (1984) and Riley v. State, 366 So.2d 19 (Fla. 1978). The evidence in Clark consisted of a statement by the defendant to a cellmate regarding the ability of a victim to identify him. Clark, 443 So.2d at 977. In Riley, the murder occurred after a perpetrator expressed concern for the victim's ability to later identify the appellant. Riley, 366 at 22. Thus, the cases relied upon by this Court in Harmon suggest that some statement by the accused at the time of the murder or afterward will suffice to support this aggravating circumstance. No statement made by Mr. Green, even in the recanted confession provided by Det. Noblitt or Sgt. Price, established any intention to commit the murders as a means of avoiding or preventing a lawful arrest. (R1107-1114; 1202-1215)

In the absence of such evidence, the Court should not uphold the finding of this aggravating circumstance. Otherwise, any murder involving acquaintances will automatically include this aggravating circumstance. This Court has held that the elimination of witnesses must be shown to be a dominant motive. Floyd v. State, 497 So.2d 1211, 1215 (Fla. 1986). It should decline the state's invitation to lower this standard.

Accordingly, the trial court's finding that Mr. Green committed the murders to avoid or prevent a lawful arrest should be reversed.

2. No Evidence Supports The State's Assertion That Mr. Green Murdered the Victims To Extinguish A Debt.

The state argues that Mr. Green murdered the Nichols as a means of cancelling a debt of $250.00. This assertion is utterly unsupported by any evidence in the record and should be rejected. Taking the evidence in a light most favorable to the state, the record only supports the idea that the purpose of Hr. Green's burglary was pecuniary gain. Cherry v. State, __So.2d__,__, 14 FLW 225, 226 (Fla. 4-27-89).

Accordingly, the trial court's doubling the aggravating circumstances--that the murders were committed in the commission of a robbery or burglary while being committed for pecuniary gain--should be stricken.

3. The Finding That The Murders Were Committed In A Cold, Calculated And Premeditated Manner Requires A Careful Plan or Prearranged Design.

The state argues that the evidence below was sufficient to support the trial court's findings that the murders were committed in a cold, calculated and premeditated manner. The state relies in part on Herring v. State, 446 So.2d 1049 (Fla.) cert. denied, 469 U.S. 989 (1984) to support its

argument that the evidence showed sufficient premeditation.

This Court expressly receded from Herring in Rogers v. State, 511 So.2d 526, 533 (Fla. 1987), cert. denied, —U.S. ___, 108 S.Ct. 733 (1988). In Rogers, this Court held that a finding that a murder was committed in a cold, calculated and premeditated manner requires a careful plan or prearranged design. Id. Nothing in the record below suggests that the murders of Mr. and Mrs. Nichols were either planned or pre-arranged. Again taking the evidence in a light most favorable to the state, the record only supports the idea that the victims died while their attacker struck out in a frenzy caused by cocaine deprivation.

The state argues that the number of stab wounds suggests the "opportunity for conscious reflection." (Answer brief, at 47) Actually, the number of stab wounds suggests the absence of a prearranged design. In Mitchell v. State, 527 So.2d 179, 182 (Fla.), —U.S. —, 109 S.Ct. 404 (1988), this Court held that the number and force of the stab wounds sustained by the victim were consistent with rage and inconsistent with a premeditated intent. The same reasoning should control this case.

In fact, the number of stab wounds and the testimony that the murders occurred as a result of cocaine deprivation suggest a mitigating circumstance not found by the trial

court. (R1207-1208) The trial court found two statutory mitigating circumstances--acting under extreme duress and impairment of the capacities to appreciate the criminality of the conduct or to conform conduct to the requirements of the law--inapplicable. §921.141(6), Fla. Stats. (1986) It also found no nonstatutory mitigating circumstance. (R2800)

The trial court did not discuss whether it considered cocaine deprivation, the only motive ascribed by the state for attempting to recover the rent check, as a mitigating circumstance. (R2800) Since the finding that the murders were cold, calculated and premeditated was clearly erroneous, the effect of cocaine deprivation as a mitigating circumstance should be considered, weighed and analyzed on remand. Moody v. State, 418 So.2d 989, 995 (Fla. 1982).

Accordingly, the trial court's finding that the murders were committed in a cold, calculated and premeditated manner should be reversed and the case should be remanded for another sentencing hearing.

B. THE TRIAL COURT'S INSTRUCTIONS ON WHETHER THE MURDERS WERE 'ESPECIALLY HEINOUS, ATROCIOUS OR CRUEL' DID NOT PROVIDE THE JURY WITH THE GRIST FOR A 'REASONED MORAL RESPONSE.'

The state relies on this Court's interpretation of "especially heinous, atrocious or cruel" as being sufficient to withstand a constitutional attack on vagueness grounds in accordance with Maynard v. Cartwright, __ U.S. __, 108 S.Ct. 1853 (1988). While this Court concededly defined those terms in State v. Dixon, 283 So.2d 1, at 9 (Fla. 1973), cert. denied 416 U.S. 943 (1974), an interpretation of an aggravating circumstance by a state's highest court does not satisfy the Eighth Amendment's certainty requirement.

In Penry v. Lynaugh, __ U.S.__, __S.Ct.__, 57 U.S.L.W. 4958 (6-26-89), the Court reversed a death penalty for the failure to define adequately the mitigating circumstances of mental retardation and an abused childhood. In Penry, the Court also found that the failure to define the terms in an interrogatory verdict coupled with a failure to instruct on mitigating circumstances deprived the petitioner of a "reasoned, moral response."

Precisely the same deficiency exists in the failure of the court below to instruct the jury in accordance with Mr. Green's proffered jury instruction. The proffered instruction provided an explanation for the meaning of "especially heinous, atrocious or cruel" by borrowing the language of Dixon. (R2672)

In the context of the trial below and Penry, whether the

trial court failed to provide an adequate definition for an aggravating as opposed to a mitigating circumstance makes no difference, The essence of a jury instruction--providing guidance of the law's requirements to the jury--was just as obviously missing in the trial court as it was in Penry.

This Court's recent decision in Smalley v. State, __ So.2d__, 14 FLW 342 (7-6-89) supports the state's argument. Smalley was decided without discussing Penry. Penry appears to mandate, though, that a jury's decision be an informed one notwithstanding this Court's uniform application of Dixon's expanded definition.

Accordingly, the case should be reversed and remanded for another penalty phase proceeding.

CONCLUSION AS TO PENALTY PEASE

The remaining issues raised in Mr. Green's initial brief as to the shortcomings of his penalty phase have been discussed fully. The sentencing phase should be reversed in light of the cummulative effect of the trial court's errors even if the aggravating circumstances pass muster under State v. Diguilio, 491 So.2d 1129 (Fla. 1986).

In summary, Mr. Green attacks the aggravating factors found by the trial court, viz:

1. Conviction of another capital felony or a felony involving threat of violence. No objection, but the trial

court erred in refusing to submit the mitigating significance of Mr. Green's prior criminal history to the jury or to consider this factor in its findings.

2. Committed during robbery or burglary. Doubled with pecuniary gain as a motive.

3. Committed to avoid arrest. Not supported by evidence.

4. Committed for pecuniary gain. No objection.

5. Heinous, atrocious or cruel. Inadequate instruction.

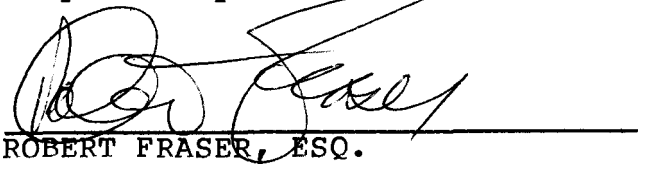
6. Cold, calculated and premeditated. Not supported by the evidence while the evidence suggests cocaine deprivation as a mitigating circumstance.

Therefore, the errors in defendant's penalty phase, considered with the prejudicial effect of the hearsay introduced during the guilt phase, compel another sentencing hearing. Castro, supra, 14 FLW at 361

CONCLUSION

On the basis of the foregoing, Mr. Green's conviction should be reversed and the case should be remanded for a new trial. At the least, the errors in the penalty phase dictate that another sentencing procedure be held.

Respectfully submitted,



ROBERT FRASER, ESQ.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to Donna A. Provonsha, Esq., Assistant Attorney General, Office of the Attorney General, 1313 N. Tampa Street, Tampa, Florida, 33602, on this 3RD day of August, 1989.

Respectfully submitted,

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