IN THE SUPREME COURT OF FLORIDA

ANDREA HICKS JACKSON,

Petitioner,

v. CASE NO. 73,982

RICHARD L. DUGGER, Secretary, Florida Dept. of Corrections; and MARTA VILLACORTA, Superintendent, Broward Correctional Institution, Pembroke Pines, Florida,

Respondents.

_____/

RESPONSE

COMES NOW Respondents, by and through the undersigned counsel, and file their response to Petitioner's Petition for Extraordinary Relief, for a Writ of Habeas Corpus, Request for Stay of Execution, and Application for Stay of Execution pending disposition of Petition for Writ of Certiorari, and as grounds would show:

Petitioner, Andrea Hicks Jackson, has filed a Petition for Writ of Habeas Corpus asserting four grounds upon which she seeks relief. Specifically, she asserts, (a) the presentation of victim impact evidence to the jury and the judge violated her Eighth and Fourteenth Amendment rights as established in **Booth v. Maryland**, 482 U.S. ____, 96 L.Ed.2d 440 (1987); (b) that the court's finding that the aggravating factor of "cold, calculated and premeditated" murder was presented in this case in an

arbitrary and capricious manner; (c) that the court failed to apply the statutory mitigating factors of "no significant history of prior criminal activity"; and (d) that appellate counsel rendered ineffective assistance of counsel in failing to raise **Caldwell v. Mississippi**, 472 U.S. 320 (1985), on direct appeal.

Respondents would deny each and every allegation presented herein and demand strict proof of each by Petitioner. Moreover, Respondents would urge, pursuant to **Hall v. State**, ____ So.2d ____ (Fla. 1989), 14 F.L.W. 101, and **O'Callaghan v. State**, ____ So.2d ____ (Fla. 1989), 14 F.L.W. 217, claims I, II and III are not cognizable in a Petition for Writ of Habeas Corpus. Claim IV, challenging the competency of appellate counsel with regard to failing to assert a **Caldwell v. Mississippi, supra**, issue, is without merit.

II. Procedural History

On June 2, 1983, a Grand Jury indicted Andrea Hicks Jackson for one count of first-degree murder. Judgment of conviction was entered on one count of first-degree murder and at the penalty phase, the jury recommended the death sentence in which the court concurred a sentence of death was imposed on February 10, 1984. The Florida Supreme Court affirmed the conviction and sentence in **Jackson v. State**, 498 So.2d 407 (Fla. 1986), **rehearing denied** (January 5, 1987), **cert. denied**, (June 22, 1987).

On March 7, 1989, Governor Bob Martinez signed a death warrant providing for Andrea Jackson's execution during the week of May 8 through May 15, 1989. Pursuant to that warrant, the execution has been set for May 9, 1989, at 7:00 a.m. On or about

April 6, 1989, Andrea Jackson filed an Emergency Motion to Vacate Judgment and Sentence with Special Request for Leave to Amend, Request for Stay of Execution and Request for Continuance of Evidentiary Hearing. On that same day, she also filed the instant Petition for Extraordinary Relief to the Florida Supreme Court. The State of Florida responded to the Emergency Motion to Vacate Judgment and Sentence on April 19, 1989, and on that same day, Judge Donald R. Moran denied Andrea Jackson's Motion for Post-Conviction Relief. An appeal followed.

III. **Statement of the Case and Facts**

The statement of the facts germaine to the issues herein raised are set out in **Jackson v. State**, 498 So.2d 406, 408-409, 411-412 (Fla. 1986). The record reflect that Andrea Hicks Jackson, on the evening of May 16, 1983, shot Officer Gary Bevel six times, four times in the head, once in the shoulder and once in the back, following her arrest for filing a false report.

On December 6, 1983, the day before the penalty phase commenced, defense counsel filed a Motion in Limine directed at the penalty phase seeking to restrict the State from using, in rebuttal, Andrea Hicks Jackson's previous criminal history. (TR 1762-1771). The trial court denied defense counsel's Motion in Limine. (TR 1771).

At the penalty phase, commencing December 7, 1983, further discussions were held as to whether defense counsel was going to waive the right to have the jury consider whether Andrea Jackson had any significant history of prior criminal activity. (TR

1803-1806). At this point another preliminary matter was disposed of and that concerned whether defense counsel planned to call Dr. Larson as a witness. Defense counsel made an affirmative statement on the record that he was not planning on calling Dr. Larson and the court observed:

> THE COURT: Okay. So, he's a confidential witness, and he is not subject to discovery, and he's not testifying.

(TR 1807).

A second Motion in Limine was orally made pre-penalty phase seeking the restriction of the testimony of Sheriff Dale Carson. (TR 1812-1817). Specifically, defense counsel argued:

> Well, I think it's a matter of law rather than facts for the jury to consider.
>
> **I don't think the overall function of the City of Jacksonville is a proper factor to go before the jury.**
>
> The other oral motion I have is with respect to cross-examination of the defense witnesses in the case. The defense will, most likely, be calling Miss Barbara Hicks, who is the mother of the defendant in the case. We would ask that the court preclude the state from inquiring into the area of homosexuality in the case. We don't believe it has any relevancy, a person's sexual preference has no bearing on the facts of this case. It is not an element in aggravation and it is not something that's a proper subject for the jury to consider in this hearing.
>
> Homosexuality is not criminal -- evidence of criminal activity in this state, and it has been held to be not proper evidence of character in this state.
>
> It is merely a sexual preference that a person may choose, or not choose, and that it should not be brought in cross-examination of the defendant's mother.
>
> THE COURT: Mr. Stetson?

MR. STETSON: Well, of course, I haven't been able to examine the defendant's mother because I just found out they were going to call her. But, that's neither here nor there.

I'm not going to purposefully bring out the homosexuality, the nature of the defendant's personality, but I'm not saying they won't open the door to it. There's alot of things that could be rebutted, and I certainly don't want to be precluded from them.

THE COURT: I have to wait and see how it goes. There was -- I remember the trial, and -- but at any rate.

MR. WHITE: Well, Your Honor, let me direct your attention --

THE COURT: I don't know what you're calling her to say.

MR. WHITE: Well, one thing I think the Court may have on it's mind, the state made several illusions to the fact she was trying to show she was a good mother. Whether we do or do not, we don't think that homosexuality has anything to do with whether she was a good mother.

In other words, a person can be a good mother and be a homosexual.

THE COURT: Let me say this, in the trial, there was a lady witness for the state that said that she said the officer was shot and killed because she hated men, and she didn't want to go back to jail.

And now, if you present evidence of something other than that, I don't know what is going to happen. I just can't anticipate it.

I don't think homosexuality has any business, it wasn't admissible at trial, then it ought not be admissible now. But, I don't know what you're going to be presenting down there. And I'll be glad -- I would ask if you get into that, approach the bench, and perhaps have a proffer on it.

> Then, we'll rule at the time. But, it's hard to rule ahead of time, not knowing what the lady's going to say.
>
> She may say, "It's my daughter, and she's had two children," and those are true facts. I don't think there is any reason to bring up her sexual preference if, in fact, it is her sexual preference. I don't know, that's another thing I don't know.
>
> MR. WHITE: I understand.

(TR 1817-1820).

The penalty phase commenced when the State called Sheriff Dale Carson to the stand. Sheriff Carson testified that Officer Bevel had an excellent reputation and that his death did have an impact on his department. (TR 1830). On the day of the crime, there was a tremendous impact on his department because officers wanted to know what had happened and they wanted to go to the scene or to the hospital. Other police officers had to call their wives to tell them they weren't the one hurt. Sheriff Carson testified that following a murder of this nature, the public may not be treated as courteously as before because officers fear for their individual safety. (TR 1831-1832). The death of a police officer causes a morale problem and problems with recruiting. (TR 1834-1835). The defense asked no questions on cross-examination of Sheriff Carson but did move to strike the entire testimony stating it was not relevant to the statutory aggravating factor that the murder was committed to hinder law enforcement. (TR 1835-1836). The state rested. (TR 1837).

The defense called Barbara Jean Hicks, Andrea Hick's mother. (TR 1838). She testified that Andrea Jackson was born on February 6, 1958, in Duval County, Florida, and she had two

brothers and a sister. (TR 1838-1839). Ms. Hicks introduced family members in the courtroom and testified that they were all there to show their support for her daughter and to offer a plea for Andrea Jackson's life. (TR 1840). Ms. Hicks testified that Andrea Jackson was an average student making C+ and B- grades in elementary school and junior high. She received a high school diploma and a degree in computer repair engineering at a Florida junior college. (TR 1841-1842). Ms. Hicks testified Andrea had a normal childhood and a normal family life and that periodically she would babysit for her brothers and sisters. (TR 1843). Ms. Hicks testified that at age 10 or 11 years, Andrea was sexually attacked by a young man and she had to be taken to the hospital. Ms. Hicks testified that this had a continuing impact and affect on Andrea Jackson throughout her life. (TR 1844). Her mother testified that Andrea attended church and she met her husband, Sheldon Jackson, at age 15 or 16. They were married several years later and as a result, Andrea Jackson bore two children, Sheldon, Jr., and Michael. Ms. Hicks testified that after meeting Sheldon and after she got married, Andrea was not the same person. She attributed much of her concerns to problems in Andrea's marriage. Andrea began to drink and started using profanity and displaying emotional outbursts. (TR 1845-1846). Ms. Hicks testified that Andrea loved her children and that she never abused them. Ms. Hicks also testified that during the month of May, Andrea was very upset because she was out of a job and she was acting very emotional during that period of time. (TR 1848-1849). Ms. Hicks testified she loved her daughter very much.

On cross-examination, Ms. Hicks testified that she knew nothing about the incident occurring on May 16, between 6:30 and 12:00, the day of the murder. Nor did she know anything about Andrea Jacskon breaking the windows of her car or making a false police report. She did testify that Andrea Jackson was not free from criminal behavior. (TR 1851-1852). On redirect examination, defense counsel asked Ms. Hicks whether she knew about Andrea Jackson's prior criminal history, to-wit: a conviction for trespass, disorderly intoxication, making threats and writing bad checks. (TR 1854).

Defense next called Rev. Jesse Bevel, Jr., the oldest brother of the victim. The state filed a motion in limine to prevent Rev. Jesse Bevel from testifying. (TR 1863-1864). The defense proffered Jesse Bevels' testimony. The trial court disallowed the testimony appearing before the jury. (TR 1881). Defense counsel called no other witnesses.

On rebuttal, the state called James Jones, a truck driver who testified that on March 31, 1981, he was called to the scene of an accident involving Andrea Hicks Jackson and asked to tow her car. She became belligerent and threatened to kill him. At the time he smelled alcohol on her breath but Andrea Jackson did not evidence intoxication. (TR 882-890). The State also called Robert Lee Jones, a police officer who investigated the March 31, 1981, incident. (TR 1893). Officer Jones testified that not only did she threaten to kill the tow truck driver but she turned on him and said that she was going to kick him in the ass. Officer Jones smelled alcohol on her breath and indicated that he couldn't reason with her. (TR 1896-1898).

At the close of rebuttal the State then introduced in evidence in rebuttal certified copies of Andrea Jackson's prior criminal conviction. (TR 1904). Defense counsel objected only to the admission as to the violation of a municipal ordinance. (TR 1904). At this point, all testimony at the penalty phase ended. (TR 1905).

The trial instructed the jury with regard to the penalty phase. (TR 2052-1061). Inclusive therein, the trial court instructed the jury that the aggravating circumstances that that they may consider were limited to (a) that the crime for which the defendant is to be sentenced was committed for the purpose of avoiding or preventing a lawful arrest or affecting an escape from custody; (b) that the crime for which the defendant is to be sentenced was committed to disrupt or hinder the lawful exercise of any governmental function or the enforcement of laws, and; (c) the crime for which the defendant is to be sentenced was committed in a cold, calculated and premeditated manner without any pretense of moral or legal justification. (TR 2053-2054). In mitigation, the Court instructed the jury that among the mitigation they may consider was (1) **whether Andrea Hicks Jackson has a significant history of prior criminal activity**; (2) whether the defendant committed the murder while she was under the influence of extreme mental or emotional disturbance; (3) whether she had the capacity to appreciate the criminality of her conduct or to conform her conduct to the requirements of law was substantially impaired; (4) the age of Andrea Hicks Jackson; (5) any other aspect of the defendant's character and any other circumstances of the offense. (TR 2054-2055).

The jury returned a death recommendation by a 9-3 vote.

On February 1, 1984, sentencing was held. The trial court received and reviewed the PSI reports submitted and after entertaining preliminary motions for a new trial and a new penalty phase, heard arguments with regard to what sentence should be imposed. (TR 2077-2099). At the sentencing phase, defense counsel reviewed why the jury's death recommendation should not be followed and discussed, in detail, the contents of the PSI report. (TR 2099-2121). Defense counsel then read a statement by Andrea Jackson stating that she was truly sorry for the death of Officer Bevel. While she admitted the shooting, she did not admit to any intent to kill him. Andrea Jackson's statement reflects:

> If I, Andrea Jackson, would have been in control of my mental ability to reason a situation of events out rationally, Officer Bevel would have been alive today.
>
> The death of Officer Bevel leaves a part of me broken and damaged, a part of me that will never be the same. I feel that with God's grace, I will be able to accept the fact that I have taken another human being's life.

(TR 2122).

On February 10, 1984, the trial court concurred with the jury's recommendation and imposed a sentence of death. The court observed:

> The Court, in mitigation, has considered your prior record in an effort to determine if it is significant. The presentence investigation reflects thirty separate charges which you have been involved with in the legal system. Most of those, to be fair, were misdemeanors, and not of serious consequence, but they can hardly be called insignificant for this factor to operate.

The Court has further considered in mitigation, your mental, emotional state at the time of the offense. The Court has considered, at the time, your mother in relating this condition. However, your course of conduct, even considering the light most favorable to you, would indicate that there was no extreme mental or emotional disturbance during the time the crime was committed.

The Court further considered your capacity to appreciate the criminality of your conduct. The evidence at trial shows you were, indeed, aware of the criminality of your conduct, and elected not to conform your conduct to the requirements of law.

The Court further considers your age at the time of the offense, that being twenty-five years old, but that attaches no significance to that factor.

Your defense, on your behalf, provided a witness, Reverend Jesse Bevel, the brother of the deceased. Reverend Bevel testified that his family sought justice, not in a sentence of death for his brother's killing. The Court did not allow the testimony before the advisory jury, but is has given it consideration and great weight in reaching its decision.

The Court, however, would note, Ms. Jackson, that the presentence investigation received in this case would indicate that the attitude as to the sentence is more unique to Reverend Bevel than to his entire family, and should, more properly, be considered in relationship to his religious profession and his consciously held beliefs in general rather in particular.

The Court has considered, in aggravation, that this crime was committed for the purpose of avoiding, preventing a lawful arrest, effecting escape from custody. It is clear that the death of this officer allowed you to escape from his custody, and that this crime was committed for that exact purpose.

The Court further finds that this killing of an on-duty uniformed police officer engaged

> in the execution of his duty did hinder and disrupt a valid governmental function and the law enforcement of law, and that you, Andrea Hicks Jackson, intended for such to occur when you consciously decided to kill Officer Bevel.
>
> The Court further finds that the crime was committed in a cold, calculated and premeditated manner.
>
> As the evidence indicates, you were armed throughout the entire event, or armed yourself when you went to your home to obtain papers relating to the ownership of the automobile. They further indicate that when you produced the pistol on the unexpecting officer, you made no attempt to disarm him or escape without the necessity of deadly force, but decided to shoot six time at point-blank range into his body.
>
> This decision was coldly, was premeditatedly made as you, earlier, removed the battery, spare tire, a license plate from the car you had just damaged, so there can be no moral or legal justification.
>
> It is upon those findings, and others, that the Court finds sufficient compelling aggravating circumstances exist to justify and require under the law, the imposition of the death penalty to you, Andrea Hicks Jackson.

(TR 2157-2160).

IV. **Reasons for Denying All Relief**

(A) **Booth v. Maryland**, 482 U.S. ____, 107 S.Ct. 2529 (1987)

As previously asserted, Respondents would urge that Claim I is not properly before the Court in that pursuant to **Hall v. State, supra**, a **Booth v. Maryland** claim should have been raised in a motion for post-conviction relief. Indeed, the record reflects that her latest 3.850 motion, she challenges the

effectiveness of her trial counsel at the penalty phase for failing to object to Sheriff Dale Carson's testimony because it equates to victim impact information in violation of **Booth v. Maryland, supra.** Moreover, this claim is precluded from further review. Albeit, **Booth v. Maryland** was not cited at the time of Jackson's direct appeal, appellate counsel did challenge the propriety of permitting the testimony of Sheriff Dale Carson at the penalty phase arguing that it was improper. On direct appeal, this Court concluded that although said testimony was relevant "to show the effect Gary Bevel's death had on Jacksonville's police force and the resulting disruption of normal police activity," that "did not prove that appellant killed Bevel in order the achieve that result." This Court further observed:

> Because Carson's testimony was presented to prove disruption of law enforcement which we have consolidated with the aggravating factor of avoiding arrest, it's admission was at most harmless error.

498 So.2d at 411.

Jackson's **Booth** claim is three-fold, (a) that since the decision in **Booth v. Maryland, supra**, victim impact evidence at the penalty phase of a capital trial violates the Fifth, Eighth and Fourteenth Amendments by "diverting the attention of the jury from it's proper and sole *consideration, namely* the defendant's background and record and the circumstances of the crime, and by creating an inpermissible risk that the death penalty will be impored in an arbitrary fashion"; (b) that Dale Carson's testimony violated this concept as well as the PSI report

presented to the trial judge which contained "voluminous hearsay victim impact evidence, from members of the Bevel family and from Gary Bevel's fellow officers, urging that Andrea Jackson deserved death because of the sterling character of the victim and the depravity of the defense."; and (c) that this Court should revisit it's decision on direct appeal in light of **Witt v. State**, 387 So.2d 922 (Fla. 1980).

The testimony of Sheriff Dale Carson was not victim impact testimony but rather was evidence that went to an aggravating factor that Andrea Jackson committed the murder in an attempt to hinder law enforcement. This Court so found in **Jackson v. State**, 498 So.2d at 411. Even assuming in some fashion it can be characterized as victim impact evidence, its admission is harmless error beyond a reasonable doubt. See **Grossman v. State**, 525 So.2d 833 (1988); **LeCroy v. State**, 533 So.2d ____ (Fla. 1988); **Darden v. Wainwright**, 477 U.S. 168 (1986), and **Jones v. State**, 533 So.2d 290 (Fla. 1988).

Moreover, with regard to evidence contained in the PSI report, defense counsel had an opportunity to review the entire report and, in fact, agreed to its use at the penalty phase of the instant trial. The PSI report was submitted to the trial judge and not the jury. The only mention made of the "victim impact statements" of the Bevel family did not concern the use of the victim impact statements against Jackson but rather was used by the trial court to support why he believed he was correct in not allowing the testimony of Reverend Jesse Bevel before the jury. (TR 2158). Moreover, a review of the victim impact

statements contained in the PSI report attached to Jackson's Petition for Writ of Habeas Corpus, reveals that there was nothing in those statements other than the family's expression of what the penalty ought to be. Unlike **Booth v. Maryland, supra**, or **Rushing v. Butler**, ____ F.2d ____ (5th Cir. March 30, 1989), (a copy of said decision is attached to Petitioner's petition), there was no shifting of attention from the individualized sentence to which Jackson was entitled to that of the nature and the character of the victim. Here, as in **LeCroy v. State, supra**, relief should be denied.[1]

(B) Cold, Calculated and Premeditated Murder

Andrea Jackson next asserts that the trial court's finding that the aggravating factor that the murder was committed in a cold, calculated and premeditated manner. This claim was resolved on direct appeal in **Jackson v. State**, 498 So.2d at 412, wherein the Court, in detail, outlined those facts and circumstances which supported this aggravating factor. In support of this contention, Jackson asserts that this Court's decision in **Rogers v. State**, 511 So.2d 526, 533 (1987), **cert.**

---

[1] Section 921.143, Florida Statutes, provides that the sentencing court shall permit the next of kin to appear before the sentencing court for the purpose of making a statement or submitting a written statement. There is neither statutory provision nor case authority that directs the jury or the trial judge that it **must consider** the victim impact statement in its deliberation as to the appropriate sentence. In **Booth v. Maryland**, the United States Supreme Court noted that the Maryland statute declared invalid, **provided specifically** that the victim **impact statment shall be considered** by the court or jury before whom the separate sentencing proceeding is conducted. See **Booth v. Maryland**, 96 L.Ed.2d at 446, n.2.

denied, 108 S.Ct. 733 (1988), requires reconsideration of this claim. Respondents would disagree and would commend to this Court the decision in **Eutzy v. State**, ____ So.2d ____ (Fla. 1989), 14 F.L.W. 176, wherein this Court announced that **Rogers v. State, supra**, was not a change of law with regard to what constituted cold, calculated and premeditated murder but rather demonstrated the evolutionary development of this aggravating factor. Certainly, based on the facts of the instant case, there exists the heightened premeditation to effect Officer Bevel's death. The facts herein more than support the standard set forth in **Rogers v. State, supra. See also Hall v. State, supra**, and **Hariah v. State**, ____ So.2d ____ (Fla. 1989), 14 F.L.W. 218.

(C) Failure to Apply the Statutory Mitigating Factor of "No Significant History of Prior Criminal Activity"

Jackson next asserts that the mitigating factor of "no significant history of prior criminal activity" should have been found in her case. This claim, pursuant to **Hall v. State, supra**, is not cognizable in a Petition for Writ of Habeas Corpus. Albeit, Jackson raises a number of complaints with regard to the penalty phase of her trial, she does not specifically address this claim in her Motion for Post-Conviction Relief. More importantly, however, this claim could have and should have been raised on direct appeal. Defense counsel, during the course of the penalty phase, publically argued to the trial court that he was considering whether to

waive this particular aggravating factor in light of the State's intent to introduce Andrea's past criminal conduct. Clearly, this is a claim that could have and should have been raised on direct appeal. This habeas should not be the vehicle upon which she is permitted to attempt a second appeal. **Raulerson v. State**, 420 So.2d 567 (Fla. 1982); **Booker v. State**, 441 So.2d 148 (Fla. 1983); **Bundy v. State**, 490 So.2d 1258 (Fla. 1986).

Finally, it should be observed that the trial court, in imposing the death penalty, concluded that this particular statutory mitigating factor was not appropriate in Andrea Jackson's case. After reviewing the PSI report and reviewing the testimony of Andrea Hicks Jackson's mother, the judge concluded that she had a significant prior history of criminal activity. (TR 2157-2158).

(D) Appellate Counsel was Ineffective in Failing to Raise **Caldwell v. Mississippi**, 472 U.S. 320 (1985).

The only claim which is cognizable in Jackson's Petition for Writ of Habeas Corpus is her last issue challenging whether appellate counsel rendered ineffective assistance for failing to raise **Caldwell v. Mississippi**, 472 U.S. 320 (1985), as a basis for relief on direct appeal. The record reflects that defense counsel did not need the decision in **Caldwell v. Mississippi, supra**, in order to raise a claim that the jury's belief as to its role might have been diminished. See **Dugger v. Adams**, ____ U.S. ____, 57 U.S.L.W. 4276 (February 1989). The record was totally devoid of any evidence that reflects that at any point

during the proceeding, either the trial judge or the prosecution or defense counsel in any way diminished or lessened the role of the jury with regard to the penalty phase of Jackson's trial. It should be noted that Jackson raised the **Caldwell** issue in her Motion for Post-Conviction Relief which was summarily dismissed by the court on the basis that this issue could have and should have been raised on direct appeal. **Hariah v. Dugger**, 844 F.2d 1464 (11th Cir. 1988), **cert. denied**, 109 S.Ct. 1355 (1989); **Tafero v. State**, 459 So.2d 1034 (Fla. 1984). There is no basis upon which to conclude that appellate counsel rendered ineffective assistance of counsel based on the record before this Court.

Conclusion

Based on the foregoing, the Petition for Writ of Habeas Corpus should be dismissed.

Respectfully submitted,

ROBERT A. BUTTERWORTH
ATTORNEY GENERAL

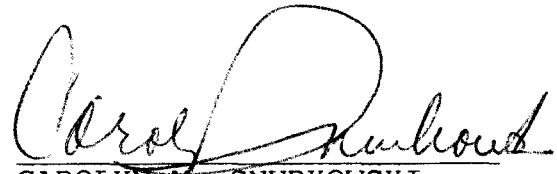
CAROLYN M. SNURKOWSKI
Assistant Attorney General
Fla. Bar No. 158541

DEPARTMENT OF LEGAL AFFAIRS
The Capitol
Tallahassee, FL 32399-1050
(904) 488-0600

COUNSEL FOR RESPONDENTS

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to Mr. Jeffrey E. Glenn, Esquire, KAPLAN, RUSSIN, VECCHI and KIRKWOOD & BERWIN LEIGHTON, 645 Madison Avenue, 20th Floor, New York, New York 10022, this 2nd day of May, 1989.



CAROLYN M. SNURKOWSKI
Assistant Attorney General

OF COUNSEL