


IN THE SUPREME COURT OF FLORIDA

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CLERK, SUPREME COURT
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WILLIE SANDERS,

Petitioner,

vs.

STATE OF FLORIDA,

Respondent.

CASE NO. 96, 398

FIFTH DCA CASE NO. 98-1523

**ON DISCRETIONARY REVIEW FROM
THE FIFTH DISTRICT COURT OF APPEAL**

PETITIONER'S BRIEF ON JURISDICTION

JAMES B. GIBSON
PUBLIC DEFENDER
SEVENTH JUDICIAL CIRCUIT

SUSAN A. FAGAN
ASSISTANT PUBLIC DEFENDER
FLORIDA BAR NO. 0845566
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ATTORNEY FOR PETITIONER

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CERTIFICATE OF FONT

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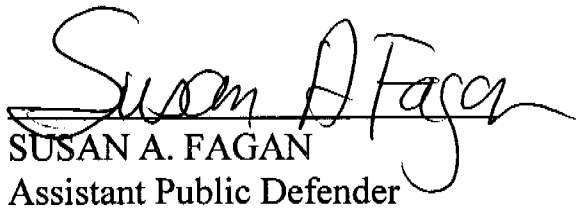

SUSAN A. FAGAN
Assistant Public Defender

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IN THE SUPREME COURT OF FLORIDA

WILLIE SANDERS,)	
)	
Petitioner,)	
)	
vs.)	CASE NO. 96, 398
)	
STATE OF FLORIDA,)	FIFTH DCA CASE NO. 98-1523
)	
Respondent.)	
_____)	

STATEMENT OF THE CASE AND FACTS

The State charged the Petitioner, Willie Sanders, in an information filed on November 26, 1997, with armed robbery with a firearm, armed burglary, aggravated fleeing and eluding, and possession of a firearm by a convicted felon. (R 22-4; Vol. 1) The Petitioner proceeded to jury trial on February 23 and 24, 1998, before Circuit Judge Newman Brock as to the armed robbery, armed burglary, and aggravated fleeing and eluding offenses. (T 2-291; Vols. 3 and 4) At the close of the State's case, which was the close of all the evidence, defense counsel made a motion for judgment of acquittal as to the armed robbery with a firearm offense, the armed burglary offense, and the aggravated fleeing and eluding offense. (T 228-230; Vol. 4) The trial court denied the motion for judgment of acquittal as to each of these offenses. (T 231; Vol. 4) The jury returned guilty verdicts as to each of

these offenses. (T 284-288; Vol. 4; R 228-229; Vol. 2) The Petitioner's motion for a new trial was denied on March 3, 1998 by the trial court. (R 236-237, 240; Vol. 2)

Lynda Dolan testified, during the trial, that she is a teller for Republic Bank and was approximately two feet behind the teller window in the bank building when two black male individuals entered the bank. (T 101-103; Vol. 3) Lynda further testified that she next observed one of the individuals leap over the counter where the teller windows were, who she described as wearing a jersey with the name "Brooks" on the back, at which point she saw that this same individual had a gun. (T 103-105; Vol. 3) This same individual, according to Lynda, then proceeded to order her to open up her money drawer. (T 107; Vol. 3) He next went to another teller's drawer and opened that up taking some money out from the drawer. (T 107; Vol. 3)

Once Lynda got her money drawer opened, the individual who jumped over the counter began pulling out hundred, fifty, and twenty, dollar bills. (T 108; Vol. 3) Within five minutes after the two suspects left the bank building, the police arrived. (T 109-110; Vol. 3) A couple of days subsequent to the robbery, Lynda was shown a photo line-up by the police during which she picked out the Appellant's photo as the individual who jumped over the counter and took the money from the cash drawers. (T 117-118; Vol. 3)

The Republic Branch manager, Glen Kish, testified that two black males entered the Republic Bank quickly just after he first saw them walk past the bank building and then walk back toward the bank building. (T 130-132; Vol. 3) The larger of the two male individuals, who wore a football jersey bearing the name "Brooks" then, according to Mr. Kish, proceeded to jump over the teller line prompting Mr. Kish to hit the alarm button on his desk, as he told his wife to also call 911, to alert a security company which, in turn, is supposed to alert the police. (T 133-135; Vol. 3) Mr. Kish further testified that as he approached the teller line, he saw the larger male individual behind the teller line he saw, at some point, a gun in this individual's possession. (T 136; Vol. 3)

Mr. Kish additionally testified that eventually the male individual wearing the football jersey jump back over the teller line after he gathered money from Lynda Dolan's and Kristy Drew's teller drawers. (T 136-137; Vol. 3) Approximately twenty minutes after the robbery, Mr. Kish was taken to an Albertson's parking lot by the police where he identified the Petitioner and the co-defendant as the robbery suspects. (T 144-145; Vol. 3) He also identified the Petitioner, in court, as the robber who jumped over the teller line wearing a football jersey. (T 138; Vol. 3) The following day, Mr. Kish picked the Petitioner's photo out of a photo line-up. (T 146-149; Vol. 3)

Deputy Dennis Lemma testified that he was in his patrol vehicle when he was alerted to the robbery occurring at the Republic Bank. (T 162-163; Vol. 3) He further testified that as he proceeded to the location of the bank, he made contact with a brown four-door Chevrolet vehicle being driven by the Petitioner which crossed a concrete median prompting Deputy Lemma to activate his emergency lights and siren. (T 163-164; Vol. 3) This caused, according to Deputy Lemma, the Petitioner to pull all of the way off the road onto the right-hand shoulder of the road and then to accelerate to a speed of approximately 65 miles per hour. (T 164-165; Vol. 3) Once the vehicle returned to the traffic lane of the road, weaving in and out of traffic, Deputy Lemma estimated the speed of the vehicle, as well as his patrol vehicle, to be excess of 70 miles per hour. (T 166-168; Vol. 3) Deputy Lemma additionally testified that the vehicle ended up running into the back of a parked truck with a trailer, followed by the vehicle making a right turn on Dog Track Road, weaving in and out of the traffic lanes, and eventually turned into the parking lot of an Albertson's store where the driver exited the vehicle. The vehicle then continued moving with the front passenger still inside until it crashed into a wall on the store. (T 171-173; Vol. 3) Money was also described by Deputy Lemma to be coming from the Petitioner's pockets and from the vehicle. (T 173; Vol. 3) The passenger then opened the door of the vehicle and ran into the wooded area. (T 174; Vol. 3)

Deputy Dwayne Mussard testified that he responded to the Albertson's store and observed the Petitioner's vehicle crash into a wall at the Albertson's store and saw the passenger, (co-defendant) Elijah Stafford, exit the vehicle after the crash. (T 185-186; Vol. 3) After Deputy Mussard and another deputy chased Stafford, he was secured and brought back to the patrol vehicle. (T 187-188; Vol. 3) At this point, according to Deputy Mussard, Stafford was searched yielding a large amount of money from Stafford's left pant leg. (T 189; Vol. 3)

The State filed a notice of election to prosecute as a prison releasee reoffender. (SR 43-45) The Petitioner filed a motion to declare section 775.082, Florida Statutes, (The Prison Releasee Reoffender Act) unconstitutional. (R 255-260; Vol. 2) The trial court denied the motion and sentenced the Petitioner to life imprisonment as to the armed burglary and armed robbery offenses. (R 231-232, 279-284, 305-321; Vol. 2)

The Petitioner timely filed a notice of appeal on November 26, 1997. (SR¹ 44-45) The Office of the Public Defender was appointed to represent the Petitioner in this appeal on June 3, 1998. The Fifth District affirmed the Petitioner's judgments and sentences in Sanders v. State, 24 Fla. L. Weekly, D 1509 (Fla. 5th DCA June 25, 1999) (Appendix A) Petitioner's motion for rehearing and/or certification

¹SR = Supplemental record

was denied on August 5, 1999. (Appendices B and C) The Petitioner filed a notice to invoke this Court's discretionary jurisdiction on August 25, 1999.

SUMMARY OF THE ARGUMENT

This Honorable Court has discretionary jurisdiction pursuant to Jollie v. State, 405 So. 2d 418 (Fla. 1981) to review the instant case where the Fifth District Court of Appeal cited in its opinion to a case which is currently pending review with this Court.

ARGUMENT

THIS COURT HAS JURISDICTION TO REVIEW
THE INSTANT CASE PURSUANT TO JOLLIE V. STATE,
405 So. 2d 418 (Fla. 1981).

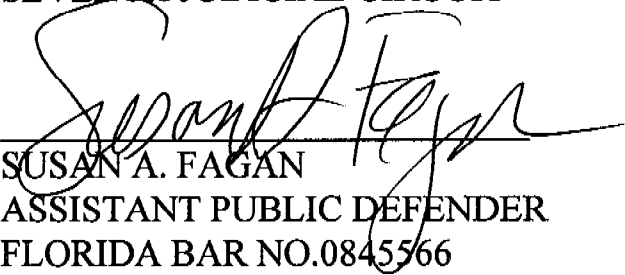
On appeal to the Fifth District Court of Appeal, Petitioner argued that the trial court erred by finding the Prison Reoffender Act, codified in Section 775.082(8)(d), Fla. Stat. (1997), constitutional. The Fifth District issued its opinion on June 25, 1999, affirming Petitioner's sentences. See, Sanders v. State, 24 Fla. L. Weekly D 1509 (Fla. 5th DCA June 25, 1999) [See Appendix A] In rejecting Petitioner's argument, the District Court held that Section 775.082(d), Fla. Stat. (1997) was constitutional citing, McKnight v. State, 727 So. 2d 314 (Fla. 3rd DCA 1999), which is currently pending for review with this Court in case number 95,154; Woods v. State, 24 Fla. L. Weekly D 831 (Fla. 1st DCA March 26, 1999), which is also currently pending for review by this Court in case number 95, 281, and Speed v. State, 24 Fla. L. Weekly D1017 (Fla. 5th DCA April 23, 1999), which is similarly pending for review before this Court in case number 95, 706. This Honorable Court has discretionary jurisdiction to accept the instant case pursuant to Jollie v. State, 405 So. 2d 418 (Fla. 1981).

CONCLUSION

Petitioner respectfully requests this Honorable Court to exercise its discretionary jurisdiction and accept the instant case for review.

Respectfully submitted,

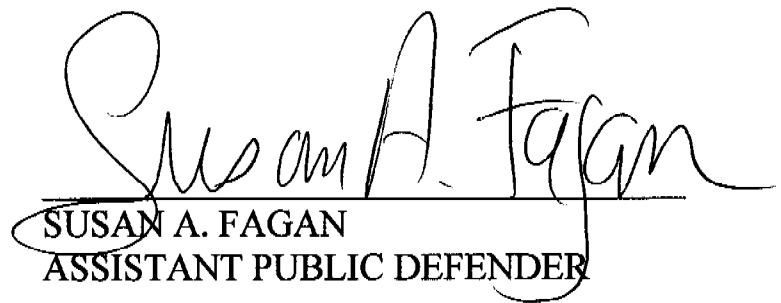
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COUNSEL FOR PETITIONER

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been hand delivered to: The Honorable Robert A. Butterworth, Attorney General, 444 Seabreeze Blvd., Fifth Floor, Daytona Beach, FL 32118 via his basket at the Fifth District Court of Appeal and mailed to: Willie Sanders, this 7th day of September, 1999.


SUSAN A. FAGAN
ASSISTANT PUBLIC DEFENDER

IN THE SUPREME COURT OF FLORIDA

WILLIE SANDERS,)
)
 Petitioner,)
)
 vs.) CASE NO. 96, 398
)
 STATE OF FLORIDA,)
)
 Respondent.)
 _____)

JURISDICTIONAL BRIEF OF PETITIONER

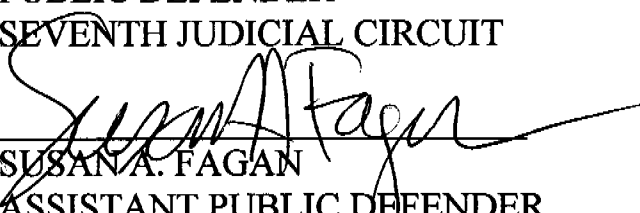
APPENDIX

APPENDIX A -- Sanders v. State, 24 Fla. L. Weekly D1509 (Fla. 5th DCA June 25, 1999)

APPENDIX B -- Petitioners Motion for Rehearing and/or Certification

APPENDIX C -- Fifth District Court of Appeal Order denying Motion for Rehearing and/or Certification

JAMES B. GIBSON
PUBLIC DEFENDER
SEVENTH JUDICIAL CIRCUIT



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to file monthly reports, we agree with the appellant's argument that there was not a sufficient evidentiary basis for the trial judge's finding that the other violations were willful. At the revocation hearing, the appellant testified that he did not attend an anger management course, perform his community service, or undergo psychological evaluation because he had never been directed by either of his probation officers as to how or where to do these things, and he did not know how to do them on his own. Testimony from the probation officers did not contradict the appellant's testimony in this regard. The appellant's failure to have completed these conditions at the time of the final hearing was not willful under these circumstances, especially in light of the fact that over four years of his five-year term of probation remained at the time the affidavit of violation was filed.

The judge did not indicate whether he would have revoked the appellant's probation and imposed the same sentence solely because of the appellant's failure to file monthly reports. We accordingly reverse the order of revocation of probation, vacate the sentence imposed upon revocation of probation, and remand this case for reconsideration of the revocation and sentencing decisions. *See Jenkins v. State*, 691 So. 2d 41 (Fla. 1st DCA 1997). (LAWRENCE and BENTON, JJ., CONCUR.)

* * *

POOLE v. STATE. 1st District. #98-3802. June 25, 1999. Appeal from the Circuit Court for Escambia County. DISMISSED. *Robinson v. State*, 373 So. 2d 898 (Fla. 1979).

WILLIAMS v. STATE. 1st District. #s 98-2936 & 98-2946. June 25, 1999. Appeal from the Circuit Court for Duval County. Dismissed. *See Robinson v. State*, 373 So. 2d 898 (Fla. 1979); *Miller v. State*, 697 So. 2d 586 (Fla. 1st DCA 1997); *Stone v. State*, 688 So. 2d 1006, 1008 (Fla. 1st DCA 1997).

* * *

WINN-DIXIE STORES, INC. vs. WRUBLE. 3rd District. #98-3236. June 23, 1999. Appeal from the Circuit Court for Dade County. Affirmed. *See E.R. Squibb & Sons, Inc. v. Farnes*, 697 So. 2d 825 (Fla. 1997) (holding that a trial court does not abuse its discretion when it grants a new trial where the verdict is against the manifest weight of the evidence).

T.L.S. vs. STATE. 3rd District. #98-2998. June 23, 1999. Appeal from the Circuit Court for Dade County. Affirmed. *See Carter v. State*, 469 So. 2d 775 (Fla. 1st DCA 1984). *See also R.A.P. v. State*, 575 So. 2d 277 (Fla. 3d DCA 1991); *D.B. v. State*, 559 So. 2d 305 (Fla. 3d DCA 1990); *Koenig v. State*, 214 So. 2d 627 (Fla. 3d DCA 1968).

GOODMAN vs. STATE. 3rd District. #98-2291. June 23, 1999. Appeal from the Circuit Court for Monroe County. Affirmed. *See Rodriguez v. State*, 622 So. 2d 1084 (Fla. 4th DCA 1993); *E.A. v. State*, 599 So. 2d 251 (Fla. 3d DCA 1992).

LOS UNIDOS ENTERPRISES, INC. vs. PENENORI. 3rd District. #98-1590. June 23, 1999. Appeal from the Circuit Court for Dade County. Affirmed. *See Williams Island Country Club, Inc. v. San Simeon at the Calif. Club, Ltd.*, 454 So. 2d 23 (Fla. 3d DCA 1984). *See also Dupont v. Whiteside*, 721 So. 2d 1259 (Fla. 5th DCA 1998); *Hunter v. Marquardt, Inc.*, 549 So. 2d 1095 (Fla. 1st DCA 1989); *Moorings Ass'n, Inc. v. Tortoise Island Communities, Inc.*, 460 So. 2d 961 (Fla. 5th DCA 1984), *quashed in part*, 489 So. 2d 22 (Fla. 1986).

LAIDLER vs. STATE. 3rd District. #98-1137. June 23, 1999. Appeal from the Circuit Court for Dade County. Affirmed. *See C.L.B. v. State*, 689 So. 2d 1171 (Fla. 2d DCA 1997) (holding that respondent properly adjudicated delinquent for disorderly conduct where his nonverbal acts disturbed or interfered with an arrest); *K.G. v. State*, 338 So. 2d 72 (Fla. 3d DCA 1976) (holding that arrest for disorderly conduct is not unconstitutional if person arrested obstructed officers' execution of their legal duty, and was not based only on comments uttered).

TERRERO vs. STATE. 3rd District. #97-3459. June 23, 1999. Appeal from the Circuit Court for Dade County. Affirmed. *See Green v. State*, 641 So. 2d 391 (Fla. 1994).

* * *

MAXLEY v. STATE. 5th District. #99-1544. June 25, 1999. 3.850 Appeal from the Circuit Court for Osceola County. AFFIRMED. *See Mitchell v. State*, 696 So. 2d 410 (Fla. 5th DCA 1997), *rev. denied*, 700 So. 2d 686 (Fla. 1997).

HANEY v. STATE. 5th District. #99-1322. June 25, 1999. 3.850 Appeal from the Circuit Court for Orange County. AFFIRMED. *See Hill v. Dugger*, 556 So. 2d 1385 (Fla. 1990).

ANDERSON v. STATE. 5th District. #99-1295. June 25, 1999. 3.800 Appeal from the Circuit Court for Sumter County. AFFIRMED. *See Sanders v. State*, 621 So. 2d 723 (Fla. 5th DCA) (Rule 3.800 challenge to scoresheet based on inaccurate prior record should have been made at sentencing and on appeal; any reduction would be *de minimis* and likely not drop defendant into lower sentencing bracket), *rev. denied*, 629 So. 2d 135 (Fla. 1993).

NEGRON v. STATE. 5th District. #98-2705. June 25, 1999. Appeal from the Circuit Court for Osceola County. AFFIRMED. *State v. Johnson*, 601 So. 2d 219 (Fla. 1992); *Amado v. State*, 585 So. 2d 282 (Fla. 1991).

PATTEN v. STATE. 5th District. #98-2677. June 25, 1999. Appeal from the Circuit Court for Orange County. AFFIRMED. *See McKnight v. State*, 727 So. 2d 314 (Fla. 3d DCA 1999); *see also Speed v. State*, 24 Fla. L. Weekly D1017 (Fla. 5th DCA April 23, 1999); *Woods v. State*, 24 Fla. L. Weekly D831 (Fla. 1st DCA March 26, 1999).

GREEN v. STATE. 5th District. #98-2063. June 25, 1999. Appeal from the Circuit Court for Putnam County. AFFIRMED. *See McKnight v. State*, 727 So. 2d 314 (Fla. 3d DCA 1999); *see also Speed v. State*, 24 Fla. L. Weekly D1017 (Fla. 5th DCA April 23, 1999); *Woods v. State*, 24 Fla. L. Weekly D831 (Fla. 1st DCA March 26, 1999).

OLIVER v. STATE. 5th District. #98-1725. June 25, 1999. Appeal from the Circuit Court for Seminole County. AFFIRMED. *See Kipping v. State*, 702 So. 2d 578, 581 (Fla. 2d DCA 1997).

SANDERS v. STATE. 5th District. #98-1523. June 25, 1999. Appeal from the Circuit Court for Seminole County. AFFIRMED. *See McKnight v. State*, 727 So. 2d 314 (Fla. 3d DCA 1999); *see also Speed v. State*, 24 Fla. L. Weekly D1017 (Fla. 5th DCA April 23, 1999); *Woods v. State*, 24 Fla. L. Weekly D831 (Fla. 1st DCA March 26, 1999).

DOBSON v. STATE. 5th District. #98-1449. June 25, 1999. 3.850 Appeal from the Circuit Court for Seminole County. AFFIRMED. *State v. Woodley*, 695 So. 2d 297 (Fla. 1997) (*State v. Gray*, 654 So. 2d 552 (Fla. 1995) does not apply retroactively).

STURGIS v. STATE. 5th District. #98-1291. June 25, 1999. Appeal from the Circuit Court for Volusia County. AFFIRMED. *See McKnight v. State*, 727 So. 2d 314 (Fla. 3d DCA 1999); *see also Speed v. State*, 24 Fla. L. Weekly D1017 (Fla. 5th DCA April 23, 1999); *Woods v. State*, 24 Fla. L. Weekly D831 (Fla. 1st DCA March 26, 1999).

* * *

IN THE DISTRICT COURT OF APPEAL, FIFTH DISTRICT
STATE OF FLORIDA

WILLIE SANDERS,)
)
 Appellant,)
)
 vs.)
)
 STATE OF FLORIDA,)
)
 Appellee.)
 _____)

DCA CASE NO. 98-1523

MOTION FOR REHEARING AND/OR CERTIFICATION

Appellant, Willie Sanders, by and through undersigned counsel and pursuant to Rule 9.330, Florida Rules of Appellate Procedure, hereby requests this Honorable Court to grant rehearing, and/or certification in this cause. As grounds, Appellant states:

1. On June 25, 1999, the panel rendered an opinion affirming the Appellant's judgments and sentences imposed under Section 775.082 (8), Florida Statutes (1997).
2. The Appellant would respectfully point out that rehearing is authorized by Rule 9.330, Florida Rules of Appellate Procedure in that the panel decision, sub judice, directly and expressly conflicts with the decision of State v. Cotton, 728 So. 2d 251 (Fla. 2d DCA 1999), rev. granted S. Ct. Case No. 94,996 (Fla. June 18, 1999). Appellant would therefore request that this Court certify conflict with the decision of Cotton which held that the trial court, not the prosecutor, has the responsibility to determine the facts and to exercise the discretion permitted by the Prison Reoffender Act under Section 775.082 (8)(d), Fla. Stat. (1997).

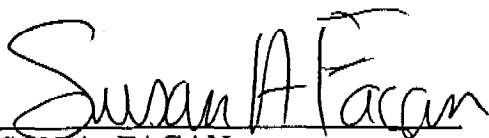
3. In the alternative, Appellant would respectfully submit that this Court certify, as a question of great public importance, which was also certified by the First District Court of Appeal in Woods v. State, 24 Fla.L.Weekly D831 (Fla. 1st DCA March 26, 1999), and in Moore v. State, 24 Fla.L.Weekly D1004 (Fla. 1st DCA April 16, 1999), the following question:

DOES THE PRISON RELEASEE REOFFENDER PUNISHMENT ACT, CODIFIED AS SECTION 775.082 (8), FLORIDA STATUTES (1997), VIOLATE THE SEPARATION OF POWERS CLAUSE OF THE FLORIDA CONSTITUTION?

WHEREFORE, Appellant respectfully requests this Honorable Court to grant rehearing, declare Section 775.082 (8) unconstitutional, and remand this cause for resentencing within the sentencing guidelines or, in the alternative, to certify conflict with the decision of Cotton supra , or, alternatively, to certify the aforementioned question of great public importance to the Supreme Court of Florida.

Respectfully submitted,

JAMES B. GIBSON
PUBLIC DEFENDER
SEVENTH JUDICIAL CIRCUIT

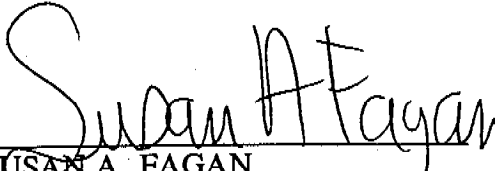


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COUNSEL FOR APPELLANT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been hand-delivered to: The Honorable Robert A. Butterworth, Attorney General, 444 Seabreeze Blvd., Fifth Floor, Daytona Beach, FL 32118, via his basket at the Fifth District Court of Appeal, and mailed to: Mr. Willie Sanders, DC # 137880, Columbia Correctional Institution, Route 7, Box 376, Lake City, Florida 32055-8767, this 8th day of July 1999.


SUSAN A. FAGAN
ASSISTANT PUBLIC DEFENDER

98-638
SF

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
FIFTH DISTRICT

WILLIE SANDERS,
Appellant,

RECEIVED

v.

CASE NO. 98-1523

STATE OF FLORIDA,
Appellee.

AUG 05 1999

PUBLIC DEFENDERS OFFICE
7th Cir. App. Div.

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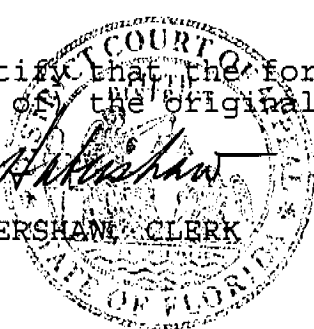
DATE: August 5, 1999

BY ORDER OF THE COURT:

ORDERED that Appellant's MOTION FOR REHEARING AND/OR
CERTIFICATION, filed July 8, 1999, is denied.

I hereby certify that the foregoing is
(a true copy of) the original Court order.

Frank J. Habersham
FRANK J. HABERSHAM, CLERK



cc: Office of the Public Defender, 7th JC
Office of the Attorney General, Daytona Beach
Willie Sanders