IN THE SUPREME COURT OF FLORIDA

BRANDON LEE BRADLEY,

Appellant,

vs.

CASE NO. SC14-1412

STATE OF FLORIDA,

Appellee.

_____/

ON APPEAL FROM THE CIRCUIT COURT,
EIGHTEENTH JUDICIAL CIRCUIT,
IN AND FOR BREVARD COUNTY

APPELLANT'S REPLY BRIEF

JAMES S. PURDY
PUBLIC DEFENDER
SEVENTH JUDICIAL CIRCUIT

By: NANCY RYAN,
Florida Bar No. 765910
ASSISTANT PUBLIC DEFENDER
444 Seabreeze Blvd., Suite 210
Daytona Beach, Florida 32118
Phone: 386/254-3758
ryan.nancy@pd7.org

COUNSEL FOR APPELLANT

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STATEMENT OF THE CASE AND FACTS

As noted in the initial brief filed in this case, Appellant moved before trial for orders requiring a unanimous jury, and requiring the jury to make all findings necessary to imposition of the death penalty. (IV 642-53, 657-58, 721-23, 741-72; V 794-98, 837-39) Those motions were denied. (I 115-19) The defense also moved to strike all references in the jury instructions, or in argument, to the jury's verdict being "advisory" or a "recommendation." (IV 733, 788; V 789-90, 861-65) That motion was denied as well. (I 113-15)

LIMITATION ON VOIR DIRE

Also as noted in the initial brief, during voir dire, defense counsel sought to ask the venire members if they could still consider mitigating evidence if they heard the case was aggravated not only by the fact that the victim was a police officer, but also by the facts that at the time the defendant was fleeing a robbery, while on probation, with a violent felony in his past. (XVI 128-29; XVII 349-54) The court permitted counsel to ask if the venire members would still consider a life sentence if six non-specified aggravating factors were proved, and to ask if they would still consider life if it were proved that the victim was a police officer. (XVI 130, 158; XVII 215, 245) The court, however, excluded questioning as to the nature of any other specific aggravating factors. (XVI 131) The judge ruled as

she did because she believed it would be unfair for the jury to hear, before the penalty phase, about the defendant's violent past. (XVII 360) Defense counsel expressly offered to waive any legal issue in that regard; the court stood by its ruling. (XVII 361-62) When the parties agreed to the jury panel, the defense renewed its objection to the limits on voir dire. (XXIII 130-31)

SUMMARY OF ARGUMENTS

Point one. The State argues that the comments objected to in penalty-phase closings were "brief" and "isolated," and did not even mention that a death recommendation was the conclusion the family and law enforcement wanted the jury to reach. It was clear from context which way the State sought to influence the jury to vote. The court's instruction to ignore argument that the police and the victim's family favor a death penalty, in an emotional case like this one, was bound to be ineffective.

Point two. The State argues that Appellant would have been irreparably prejudiced in the guilt phase if the venire had heard he not only shot a police officer, but did so while fleeing a robbery while on probation for another robbery. However, the jurors in the guilt phase heard that at the time of the shooting the defendant was escaping a robbery while on probation, and that he was being supervised by a "high-risk specialist" from the probation office. Thus no prejudice to the defense would have ensued had the expanded voir dire been granted.

The State argues that since no biased juror was seated, any error raised on this point is harmless. It is not possible to point to a seated juror whose biases might have been flushed out by the requested questioning, since counsel abided by the trial court's ruling and did not pursue the requested subject matter in *voir dire*.

The error is of a kind this court has ruled *per se* reversible, since this court would have to speculate to determine its effect on the jury panel.

Point three. The State argues that it called Amanda Ozburn to do more than impeach her, *i.e.*, to show that Appellant habitually carried a handgun, and to show that he intended to run from police if stopped. However, those facts were attested to by other State witnesses. The error in allowing Ozburn's testimony was harmful in that the State relied on heightened premeditation in the penalty phase.

Point four. The State argues the motion for mistrial was untimely. The motion was made while the witness was involved was still on the stand, and was timely renewed before the jury went out to deliberate in the guilt phase.

On the merits, the State asserts that Appellant relies on speculation to argue that the objected-to testimony showed *both* that the defendant's priors were serious, *and* that he was known to authorities to have threatened officers. Appellant's position is that the jury is likely to have inferred *one of* those conclusions.

Point five. The State argues this point was not preserved since it was not renewed at the time the instructions were read. Where a trial court has been given clear notice what jury instructions a party wants, that party need not object again.

The State now argues on the merits that the aggravating factors at issue are not genuinely duplicative. However, the State agreed with the defense in the trial

court that the "avoid arrest" and "victim is an officer" aggravating circumstances do in fact merge on the facts of this case.

The State argues that any error was harmless because "the State argued to the jury against double weight." However, the argument of counsel generally carries less weight with a jury than do instructions from the court. The State further argues that any error is harmless because the court, in its sentencing order, merged the two aggravators at issue. However, this position has been overtaken by *Hurst v. Florida*, 136 S. Ct. 616 (2016) (see Points Seven and Eight *infra).*

Point six. The argument made on this point - objecting to the trial court's findings in support of the death penalty - is moot in light of *Hurst v. Florida* (see Points Seven and Eight *infra*).

Points seven and eight. Appellant sought jury instructions which did not characterize the jury's role as advisory, but that relief was denied. The jury recommended death by a 10-2 vote. That recommendation was irretrievably tainted by the standard instructions, which minimized the jury's responsibility. Further, the Supreme Court's cases assume that unanimous jury findings are required in death sentencing matters. In any event, Section 775.082(2), Florida Statutes, mandates commutation to a life sentence where, as here, the United States Supreme Court holds Florida's death-penalty scheme unconstitutional.

Point nine. The appellant will rely on the argument made in his initial brief on this point.

ARGUMENT

POINT ONE

IN REPLY: THE COURT ERRED IN DENYING A MISTRIAL WHEN THE STATE RELIED ON NON-RECORD FACTS DURING PENALTY-PHASE CLOSINGS. THE STATE'S PENALTY-PHASE CLOSING AS A WHOLE DENIED APPELLANT DUE PROCESS AND THE HEIGHTENED RELIABILITY GUARANTEED BY THE EIGHTH AMENDMENT, AND INFRINGED ON HIS RIGHT TO TRIAL BY AN IMPARTIAL JURY.

The State argues that the curative instruction the court read "was given at Appellant's request." (Answer brief at 48) As noted in the initial brief, the defense expressly argued that the curative instruction was inadequate, but acceded to it when the court made it clear that the requested mistrial was not forthcoming. (XXXVI 2742-49; see initial brief at 19-20)

The State also asserts that the prosecutor's explanation of his comments "tends to show that he believed he was making a fair comment on the door that was opened" in the guilt phase. (Answer brief at 48) Counsel's beliefs are not dispositive; whether a comment was fair is for the courts, and in a criminal case, whether comment which goes too far amounts to reversible error is determined by whether the defendant was prejudiced. *See* *Teffeteller v. State*, 439 So. 2d 840, 845 (Fla. 1983).

The State further argues that the comments objected to were "brief" and "isolated," and did not even mention that a death recommendation was the conclusion the family and law enforcement wanted the jury to reach. (Answer brief at 50, 53) It was, of course, perfectly clear from context which way the State sought to influence the jury to vote. That the prosecutor did not return to his chosen theme after the court sustained the defense objection and gave a curative instruction does not establish that little or no lasting harm was done beforehand. This court has noted that a curative instruction directing a jury to ignore testimony about a criminal defendant's significant prior record is "of legendary ineffectiveness." *Geralds v. State*, 601 So. 2d 1157, 1162 (Fla. 1992). An instruction to ignore argument that the police and the victim's family favor a death penalty, in an emotional case like this one, is bound to be similarly ineffective. The rights to an impartial jury and to due process, and the Eighth Amendment interest in reliable sentencing proceedings, were all violated by the State's conduct in this case, and this court should vacate the death sentence and remand for a new penalty phase.

POINT TWO

IN REPLY: THE TRIAL COURT ERRED IN LIMITING THE DEFENSE QUESTIONING OF POTENTIAL JURORS. THE ERROR AMOUNTED TO A DENIAL OF THE RIGHTS TO TRIAL BY AN IMPARTIAL JURY, AND TO DUE PROCESS OF LAW.

The State argues the issue raised on this point was either unpreserved or insufficiently briefed in that no record citations appear at pages 45-48 of the initial brief, and in that the record does not appear to counsel to support the assertions made in the initial brief on this point. (Answer brief at 53-55) The appropriate record summary and citations appear at page 3 of the initial brief, and are repeated above at pages 1-2.[1]

On the merits, the State argues that Appellant would have been irreparably prejudiced in the guilt phase if the venire had heard he not only shot a police officer, but did so while fleeing a robbery while on probation for another robbery. Its position is that the trial court acted within its discretion to disallow *voir dire* questioning that would have disclosed those facts, since otherwise the court would

[1] Counsel for the State may have been misled by the eccentric pagination of the record. Voir dire was initially transcribed in part, then by order of this court on a joint motion of the parties was re-transcribed in full. Unfortunately the clerk of the lower court duplicated volume numbers in the process. The volumes 16-17 that are cited above and in the initial brief are the volumes 16-17 that were last filed with this court.

not have been able to ensure a fair trial. (Answer brief at 56) As noted above and in the initial brief, defense counsel expressly offered to waive any legal issue in that regard. (XVII 361-62) The State now takes the position that "had the jury been questioned on those issues, there is no doubt there would be a claim on appeal that such information, prior to the sentencing phase, improperly influenced the jury." (Answer brief at 58) Had the motion to expand voir dire been successful, Appellant's counsel would have been estopped from taking the opposite position in this appeal. *E.g.*, *Blumberg v. USAA Cas. Ins. Co.*, 790 So. 2d 1061, 1066-67 (Fla. 2001).

Further, as both parties were aware at the time of *voir dire*, the jurors in the guilt phase would (and did) hear that at the time of the shooting the defendant was escaping a robbery while on probation. The jurors in this case further heard that he was under the supervision of a "high-risk specialist" from the probation office at the time (see Point 4, *infra).* Thus no prejudice to the defense would have ensued had the expanded voir dire been granted.

The State argues that since no biased juror was seated, any error raised on this point is harmless. (Answer brief at 60) It is not possible for Appellant to point to a seated juror whose biases might have been flushed out by the requested questioning, since counsel abided by the trial court's ruling and did not pursue the

requested subject matter in *voir dire*. The error is of a kind this court has ruled *per se* reversible, since this court would have to speculate to determine the effect of the error on the jury panel. *See, e.g.*, *Johnson v. State*, 53 So. 3rd 1003, 1007 (Fla. 2010). The outcome in the penalty phase may have been affected by the limitation on voir dire, and the sentence appealed from should be reversed.

POINT THREE

IN REPLY: THE TRIAL COURT ERRED BY ALLOWING THE STATE TO CALL AMANDA OZBURN FOR THE PRIMARY PURPOSE OF IMPEACHING HER TESTIMONY.

On the merits of this point, the State argues that it appropriately called Amanda Ozburn to show that Appellant habitually carried a handgun, and to show that he intended to run from police if stopped. (Answer brief at 66) As argued in the initial brief, those facts had been attested to by other State witnesses at the time Ms. Ozburn was called.

The State argues that any error on this point was harmless because the jury heard a curative instruction, because the State did not rely on the "going out like a soldier" statement after getting it into evidence, and because the proof of guilt was great. (Answer brief at 68-70) The curative instruction was to the effect that the "like a soldier" statement was only relevant to Ozburn's credibility; however, in penalty-phase closing, the State relied on it as substantive evidence when it asserted that Ozburn testified "he said he would run *at a minimum* if he were... stopped by police." (XXXVI 2723, emphasis added; see initial brief at 17) The State cannot establish that proof of heightened premeditation could be harmless in the penalty phase of this case, where the State relied on the aggravating factor

"cold, calculated and premeditated."

POINT FOUR

IN REPLY: THE TRIAL COURT ERRED IN DENYING A MISTRIAL IN THE GUILT PHASE, AFTER APPELLANT'S PROBATION OFFICER TESTIFIED HE WAS A "HIGH-RISK SPECIALIST."

The State relies, for affirmance, on the fact Appellant's initial motion for mistrial was made somewhat after the "high-risk specialist" testimony was elicited. (Answer brief at 70-73) The motion was made while the probation officer was still on the stand. (XXIV 229) The judge called for a response from the State before ruling; the record shows she understood the underlying objection and the motion, and intended to overrule the objection and deny a mistrial. (XXIV 229-31) Further, the motion for mistrial was renewed before the jury went out to deliberate in the guilt phase, and again no relief was forthcoming. (XXXIII 2061) The issue now raised was appropriately preserved for appeal. *See generally* *State v. Heathcoat*, 442 So. 2d 955, 956 (Fla. 1983) (contemporaneous objection rule satisfied where judge was given a clear opportunity to rule); *cf.* *State v. Cumbie*, 380 So. 2d 1031, 1033-34 (Fla. 1980) (mistrial motion too late after jury has retired).

On the merits, the State asserts that Appellant relies on speculation to argue that the objected-to testimony showed *both* that the defendant's priors were serious, *and* that he was known to the probation authorities to have threatened officers.

(Answer brief at 74) Appellant's position is that the jurors are likely to have inferred one or the other of those conclusions. (See initial brief at 54-55)

The State argues that any error on this point is harmless, since the jury knew the defendant had absconded from probation "so he was in fact a 'high-risk' probationer." (Answer brief at 75) The probation officer testified that he was already supervising Appellant before he absconded, so that interpretation of the testimony by the jury is unlikely. (XXIV 225-26) The State further argues that jurors "would have no idea that any probation officer was not titled a 'high risk specialist.'" (Answer brief at 75) Again, the State relies on an unlikely supposition. Finally, the State refers to the objected-to comment as "isolated;" it was, in fact, the first item of testimony elicited by the State. (XXIV 224) Appellant stands by his argument that the requested mistrial should have been granted.

POINT FIVE

IN REPLY: THE TRIAL COURT ERRED IN OVERRULING THE DEFENSE REQUEST TO INSTRUCT THE JURY THAT THE AGGRAVATING FACTORS "VICTIM IS A LAW ENFORCEMENT OFFICER" AND "OFFENSE WAS COMMITTED TO AVOID ARREST" MERGE AND SHOULD BE CONSIDERED AS ONE FACTOR.

The State argues that this point was not preserved for appeal since it was argued only during the charge conference and not renewed at the time the instructions were read. (Answer brief at 75-76) It cites no authority in support of its position. This court held in *State v. Heathcoat*, 442 So. 2d 955 (Fla. 1983), *supra*, that where a trial court has been given clear notice what jury instructions a party wants, that party need not again object once it is clear that a further objection would be pointless. *Heathcoat* at 956. *Accord* *Marquard v. State*, 850 So. 2d 417, 433 n.15 (Fla. 2002).

The sole argument the State makes on the merits is that the aggravating factors at issue are not genuinely duplicative. (Answer brief at 78 n.24) This is a new view of the matter for the State, which agreed with the defense in the trial court that the "avoid arrest" and "victim is an officer" aggravating circumstances do in fact merge on the facts of this case. (XXXVI 2668, 2670)

The State argues that any error was harmless because "the State argued to the

jury against double weight." (Answer brief at 79) However, the argument of counsel "generally carr[ies] less weight with a jury than do instructions from the court," since the former is "likely viewed as the statements of advocates," as distinct from jury instructions, which are "viewed as definitive and binding statements of the law." *Boyde v. California*, 494 U.S. 370, 384 (1990). *See Cliff Berry, Inc. v. State*, 116 So. 3rd 394, 411-12 and n.17 (Fla. 3rd DCA 2012).

The State further argues that any error is harmless because the court, in its sentencing order, merged the two aggravators at issue. However, this position has been overtaken by *Hurst v. Florida*, 136 S. Ct. 616 (2016), which requires the jury rather than the court to find all facts necessary to imposition of the death penalty. For this reason and the others raised in this appeal, the sentence appealed from should be vacated and the case remanded for a new penalty phase.

POINT SIX

IN REPLY: THE TRIAL COURT ERRED IN WEIGHING THE PROOF OFFERED IN MITIGATION. APPELLANT'S RIGHT TO RELIABLE SENTENCING PROCEEDINGS, GUARANTEED BY THE FEDERAL EIGHTH AMENDMENT, WAS ADVERSELY AFFECTED.

The parties' arguments on this point have been overtaken by the events of 2016. *See* *Hurst v. Florida*, 136 S. Ct. 616 (2016).

POINTS SEVEN AND EIGHT

IN REPLY: THE TRIAL COURT ERRED IN DENYING RELIEF BASED ON *RING v. ARIZONA* AND *CALDWELL v. MISSISSIPPI*.

As noted in the initial brief filed in this case, Appellant moved before trial for orders requiring a unanimous jury, and requiring the jury to make all findings necessary to imposition of the death penalty. (IV 642-53, 657-58, 721-23, 741-72; V 794-98, 837-39) Those motions were denied. (I 115-19) The defense also moved to strike all references in the jury instructions, or in argument, to the jury's verdict being "advisory" or a "recommendation." (IV 733, 788; V 789-90, 861-65) That motion was denied as well. (I 113-15)

Hurst v. Florida, 136 S. Ct. 616 (2016), mandates reversal of the death sentence in any case where, as here, Florida's standard penalty-phase jury instructions were read. Those instructions refer on over two dozen occasions to the advisory nature of the jury's sentencing recommendation, and thus clearly and repeatedly diminish the jury's sense of responsibility in violation of *Caldwell v. Mississippi*, 472 U.S. 320 (1985). This court's holding to the contrary in *Combs v. State*, 525 So. 2d 853 (Fla. 1988), has clearly been effectively overruled by *Hurst*. Just after *Ring v. Arizona*, 536 U.S. 584 (2002), was decided, Justices Pariente and Lewis, concurring in *Bottoson v. Moore*, 833 So. 2d 693 (Fla. 2002), presciently

noted that Florida's penalty-phase instructions will need to be reevaluated, since they "emphasize the jury's advisory role." *Bottoson* at 723 (Pariente, J., concurring). *Accord id*. at 731 (Lewis, J., concurring). After *Hurst*, it cannot seriously be asserted that the standard instructions read in this case do not run afoul of *Caldwell*.

In *Caldwell*, counsel for the State argued to the jury that its capital sentencing decision was automatically reviewable by the state supreme court. The United States Supreme Court vacated Caldwell's sentence, firmly holding "it is constitutionally impermissible to rest a death sentence on a determination made by a sentencer who has been led to believe that the responsibility for determining the appropriateness of the defendant's death rests elsewhere." *Caldwell* at 328-29. That a jury has heard its role diminished by the court, rather than counsel, weighs even more heavily in favor of reversal, since as noted above the argument of counsel is "likely viewed as the statements of advocates," as distinct from jury instructions, which are "viewed as definitive and binding statements of the law." *Boyde v. California*, 494 U.S. 370, 384 (1990). "The influence of the trial judge on the jury is necessarily and properly of great weight, and jurors are ever watchful of the words that fall from him. Particularly in a criminal trial, the judge's last word is apt to be the decisive word." *Bollenbach v. United States*, 326 U.S. 607, 612 (1946).

The State argues that Sixth Amendment interests are not implicated in any Florida capital case where the defendant has a conviction for a prior violent felony, or was convicted of a violent felony contemporaneously with the murder. (Answer brief at 85-88) The State further posits that the only fact needed in Florida to make a defendant eligible for the death penalty is the existence of a single aggravating factor. (Answer brief at 85-86) However, in *Hurst,* the Supreme Court held that the jury must find that *sufficient* facts exist to warrant imposition of the death penalty, and that the showing in mitigation was not outweighed by the showing in aggravation - findings that were not made in this case.

Further, the Supreme Court's holding that certain categories of error are "structural" and accordingly not subject to harmless-error analysis applies here. In *Sullivan v. Louisiana*, 508 U.S. 275 (1993), the jury was misinstructed as to the essence of the reasonable doubt standard. In that circumstance, per the Court, the jury's findings are vitiated altogether, and thus "there has been no jury verdict within the meaning of the Sixth Amendment" to which harmless-error analysis could be applied. *Sullivan* at 280. The error in this case - instructing the jury at length that its contribution to the proceedings would be merely advisory - is analogous to the error committed in *Sullivan*.

This court engages in similar analysis, in cases addressing "*per se* reversibility." *See Johnson v. State*, 53 So. 3rd 1003, 1007 (Fla. 2010). As noted above, this court reverses *per se* when the appellate court "would have to engage in pure speculation in order to attempt to determine the potential effect of the error on the jury." This court would have to speculate to conclude that every juror in this case would have voted in the same manner had it been conveyed to them that the life-or-death decision was theirs and theirs alone. Since this court does not permit itself such speculation, *see Johnson, supra, per se* reversal and remand for a new penalty phase is in order.

Further, the opinions in *Ring* speak in terms of unanimous jury findings in the death-penalty context, and nothing in *Hurst* suggests that unanimity in death sentences is *not* required. A new penalty phase is warranted in light of the 10-2 jury recommendation of death.

On an alternative basis, this court should commute Appellant's death sentence to a life sentence. Section 775.082(2), Florida Statutes, provides:

> In the event the death penalty in a capital felony is held to be unconstitutional by the Florida Supreme Court or the United States Supreme Court, the court having jurisdiction over a person previously sentenced to death for a capital felony shall cause such person to be brought before the court, and the court shall sentence such person to life imprisonment as provided in subsection (1).

After the United States Supreme Court issued its decision in *Furman v. Georgia*, 408 U.S. 238, 308 (1972), but while rehearing was pending in that case, this court addressed the law now codified as Section 775.082(2) in *Donaldson v. Sack*, 265 So. 2d 499 (Fla. 1972). In that case this court said:

> We have given general consideration to any effect upon the current legislative enactment to commute present death sentences to become effective October 1, 1972. The statute was conditioned upon the very holding which now has come to pass by the U.S. Supreme Court in invalidating the death penalty *as now legislated*. It is worded to apply to those persons already convicted without recommendation of mercy and under sentence of death.

265 So. 2d at 505 (emphasis added). Subsequently, after the rehearing petition was disposed of in *Furman*, this court, citing *Donaldson v. Sack*, determined that it should commute to life all the death sentences imposed under the scheme held to be unconstitutional in *Furman*. *Anderson v. State*, 267 So. 2d 8, 9-10 (Fla. 1972).

Anderson should be applied here. *Furman* was a 5-4 decision, with five separate opinions issued by the Justices in the majority. As the dissenting Justices noted, the narrowest of the majority's opinions were authored by Justices Stewart and White. *Furman* at 375 (Burger, C.J., dissenting.) "When a fragmented Court decides a case and no single rationale explaining the result enjoys the assent of five Justices, the holding of the Court may be viewed as that position taken by those

Members who concurred in the judgments on the narrowest grounds." *Ventura v. State*, 2 So. 3rd 194, 200 (Fla. 2009), *citing* *Gregg v. Georgia*, 428 U.S. 153, 169 n.15 (1976). In *Furman*, Justices Stewart and White joined the majority based on their belief that the death penalty was at that time enforced "wantonly" and "freakishly" against "a capriciously selected random handful," *Furman* at 309-10 (Stewart, J., concurring), on each occasion by a jury acting "in its own discretion ... no matter what the circumstances." *Furman* at 314 (White, J., concurring.) The gravamen of *Furman* was thus that untrammeled decision-making in capital sentencing had the effect of violating the Eighth Amendment.

The holding of *Hurst* is that Florida's death-penalty scheme has the effect of violating the Sixth Amendment guarantee of trial by jury, in that juries' discretion - guided though it is by post-*Furman* statutes setting out permissible aggravating factors - is usurped by judges' having the final say in finding the facts that underly a death sentence. In both *Furman* and *Hurst*, the Court struck down a death-penalty scheme because of a serious defect in the process whereby those who will suffer the penalty are chosen. In both situations, the existing death penalty was held by the Court to be unconstitutional as currently legislated. In *Anderson* this court effectively held that the law now codified as Section 775.082(2) dictated how to deal with death sentences handed down under the pre-*Furman* scheme, since the

Legislature had made it clear what its preference would be in the event the scheme was ruled unconstitutional as currently legislated. This court should follow the precedent it set in *Anderson* and commute Appellant's sentence to life in prison.

POINT NINE

IN REPLY: THE DEATH PENALTY IS NOT PROPORTIONATE IN THIS CASE.

The appellant will rely on the argument made in the initial brief on this point.

CONCLUSION

Appellant has shown that this court should reverse the orders of judgment and sentence appealed from, and remand for a new guilt-phase trial, on the bases argued as Points Three and Four above.

If that relief is denied, this court should vacate Appellant's death sentence and remand for imposition of a life sentence (see Points Seven through Nine).

If that relief is denied, this court should vacate the sentence imposed below and remand for a new penalty phase, on the grounds argued on Points One, Two, Three, Five, Seven, and Eight above.

JAMES S. PURDY,
PUBLIC DEFENDER

Nancy Ryan
By: NANCY RYAN
ASSISTANT PUBLIC DEFENDER
Florida Bar No. 765910
444 Seabreeze Blvd., Suite 210
Daytona Beach, Florida 32118
Phone: 386/254-3758
ryan.nancy@pd7.org

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing initial brief has been electronically delivered to Assistant Attorney General Stacey Kircher, at capappdab@myfloridalegal.com, this 15th day of February, 2016.

CERTIFICATE OF COMPLIANCE

The undersigned certifies that this brief complies with Rule 9.210(2)(a), Florida Rules of Appellate Procedure, in that it is set in Times New Roman 14-point font.

Nancy Ryan

Nancy Ryan