

IN THE SUPREME COURT OF FLORIDA

MERYL MCDONALD,

Appellant,

v.

Case No:SC19-635

L.T. No: CRC94-2958-CFANO-

STATE OF FLORIDA,

Appellee.

ADDENDUM TO APPELLANT'S SUPPLEMENTAL BRIEF

On appeal from the Circuit Court of the Sixth Judicial Circuit,
In and for Pinellas County, Florida

Addendum to Appellants Supplemental Brief pursuant to this court's order
dated December 19th 2019 and all applicable rules of Appellate Procedure

Meryl McDonald pro se
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ADDITIONAL ARGUMENT

Appellant Meryl McDonald, pro se, would with this Court's permission, present an alternative to, and additional argument in regards to the continuing viability of the decision in *Gordon v. State*, 75 So.3d 200 (2011) and the constitutionality of rule 3.851(b)(6) & (i).

In Appellant's Supplemental Brief, appellant argued for a *Nelson/Faretta* type procedure to be implemented into rule 3.851; however, upon further reflection, appellant realizes that there is a simpler way in which to solve the issue presently before this Court.

Appellant would asseverate that it would more prudent to allow for a procedure where once Post-Conviction Counsel submits their motions, petitions, briefs etc. etc., then the death sentenced defendant would then be allowed to submit one filing raising any/all issues that he/she feels needs to be reviewed by the Court.

This type of procedure being incorporated into rule 3.851 would alleviate undo filings by the defendant and at the same time save on judicial resources, where it would allow the Court to review everything at one time. Thus, a limited amount of situations would arise where the need for the *Nelson/ Faretta* type procedure would be required.

CONCLUSION

Therefore, appellant respectfully requests that this Honorable Court consider, during their review of this case, this alternative solution to the unconstitutional application of rule 3.851(b)(6) & (i) and this Courts decision in *Gordon v. State*, 75 So.3d 200 (2011).

Respectfully Submitted,

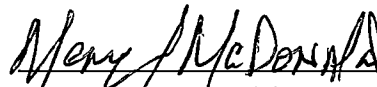
A handwritten signature in black ink that reads "Meryl McDonald". The signature is written in a cursive style and is positioned above a horizontal line.

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CERTIFICATE OF SERVICE


I HEREBY CERTIFY that a true and correct copy of the foregoing Appellant's Supplemental Brief , Was placed in the hands of prison officials for mailing to: Florida Supreme Court, Supreme Court Bldg. 500 S. Duval St., Tallahassee, Florida 32399; Jonathan Hackworth, Esq. Hackworth Law, 1818 N. 15th Street, Tampa, Florida 33605 - 3642; Timothy A. Freeland, Assist. Atty. Gen., 3507 E. Frontage Road, Suite 200, Tampa, Florida 33607 Florida on this 30 day of January 2020.

Respectfully Submitted,


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Appellant *pro se*

CERTIFICATE OF COMPLIANCE

I Hereby certify that this brief complies with the font requirements of Rule 9.210(a)(2) of the Florida Rules of Appellate Procedure.


Meryl McDonald DC# 180399