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IN THE SUPREME COURT OF FLORIDA

CASE NO. SC2024-1512

L.T. NO. 16-2010-CF-008424

DAVID KELSEY SPARRE,

Appellant,

v.

STATE OF FLORIDA,

Appellee.

ON APPEAL FROM THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT, IN AND FOR DUVAL COUNTY

REPLY BRIEF OF APPELLANT

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REPLY ARGUMENT

I. The State incorrectly argues that the failure to hold a case management conference is not a denial of due process.

The State excuses the circuit court's failure to hold a case management conference by arguing that (1) case management conferences are not mandatory in successive postconviction litigation, (2) refusing to permit oral argument does not violate due process, and (3) even if the failure to hold a case management conference here is found to be error, it is harmless error. This Court should reject each of these arguments.

First, the State glosses over the fact that Florida Rule of Criminal Procedure 3.851(f)(5)(B) clearly *does* require a case management conference, even in successive cases. The text of the rule plainly states that "the trial court shall hold a case management conference," and "the trial court also shall determine whether an evidentiary hearing should be held and hear argument on any purely legal claims not based on disputed facts." Fla. R. Crim. P. 3.851(f)(5)(B). There is no ambiguity in the case law about what this language requires. *See Sanders v. City of Orlando*, 997 So. 2d 1089, 1095 (Fla. 2008) ("The word 'shall' is mandatory in nature."); *Lexecon*

Inc. v. Millberg, 523 U.S. 26, 35 (1998) ("The Panel's instruction comes in terms of the mandatory 'shall,' which normally creates an obligation impervious to judicial discretion."). Though the State acknowledges and even quotes Rule 3.851(f)(5)(B) in its brief, it discounts that the statute's plain language was not followed here. AB 17-18. The State may argue that the circuit court's violation of the rules was harmless, but it is textually clear that a violation occurred.[1]

Second, the State misses the point in repeatedly emphasizing that the "Constitution does not require oral argument in all cases." *Fed. Communications Comm'n v. WJR, The Goodwill Station*, 337 U.S. 265, 276 (1949). Appellant's argument is that the circuit court failed to follow the clear mandate of this State's Rules of Criminal Procedure and, under the circumstances presented, that failure amounted to a violation of due process, even though this case is in a successive posture. As explained in the initial brief, this Court has not ruled out that there may be circumstances where the failure to follow the text

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[1] The circuit court itself knew that the rule required a case management conference because it acknowledged as much when it corrected its error and held a case management conference in Sparre's first successive Rule 3.851 proceeding. (PCR-3. 84). There, the court acknowledged that holding a case management conference "ensure[s] that there are no appellate issues." (PCR-3. 84).

of the case management rule could result in a violation of due process, even in a successive case. In fact, in the very case the State cites above, the Supreme Court emphasized that whether the parties should be heard orally must be a "case-to-case determination, through which alone account may be taken of differences in the particular interests affected, circumstances involved, and procedures prescribed by Congress for dealing with them." *Id.* at 277. That did not happen here—the circuit court simply ignored Appellant's repeated requests to be heard at a case management conference.

A recent decision of the U.S. Court of Appeals for the Eleventh Circuit exemplifies the federal due-process problems created by the circuit court's terse dismissal of Appellant's claims without giving him the opportunity to be heard. *See Williams v. Warden, GDCP*, No. 22-10249, 2024 WL 4439968, at *7 (11th Cir. 2024). There, the notice-and-opportunity-to-be-heard requirement was *not* explicit in the federal habeas rules, yet the Eleventh Circuit found that the requirement "conforms with bedrock conceptions of due process," and vacated the district court's *sua sponte* dismissal of the petitioner's claims. *Id.* at *4. The Eleventh Circuit explained that the "complete denial of the opportunity to be heard on a material issue

is a violation of due process which is never harmless error." *Id.* at *7 (internal citations omitted).[2]

Thus, the State is wrong that the circuit court's failure to follow the rule was harmless. The issues Appellant raised were neither insubstantial nor frivolous—the standard this Court has set for the harmlessness of case-management violations. *See Taylor v. State*, 260 So. 3d 151, 157-58 (Fla. 2018). Appellant acknowledged in his initial brief that precedents like *Huff v. State*, 622 So. 2d 982, 983 (Fla. 1993), provide that it is an automatic due process violation to fail to hold a case management conference only in an initial postconviction case. But this Court has not ruled out that, under certain case-specific circumstances, a due process violation could arise in a successive case. And even though the case-management rule arises in the state-law context, its violation under certain circumstances can contravene federal law. *See Logan v. Zimmerman*

[2] The State suggests that Appellant was permitted to submit his arguments in writing, which satisfied due process. AB 20. But there is no indication that the circuit court's review of Sparre's motion was anything more than perfunctory, as the court's order did not address the core arguments that Appellant proffered. *See Williams*, 2024 WL 4439968, at *7 (written motion for reconsideration not sufficient to satisfy the opportunity-to-be-heard requirement of due process).

Brush Co., 455 U.S. 422, 429-30 ("[T]he Fourteenth Amendment's Due Process Clause has been interpreted as preventing the States from denying potential litigants use of established adjudicatory procedures, when such an action would be 'the equivalent of denying them an opportunity to be heard upon their claimed right[s].'").

Here, the failure to hold a case management conference perpetuated great harm despite this being a successive motion. Not only did Appellant request to be heard, but he told the circuit court that he had specific arguments to make in response to the reasoning in the court's premature order denying relief. As described in the initial brief, those arguments were substantial and non-frivolous. The circuit court was aware of the rule, having acknowledged it in a prior proceeding, but knowingly refused to allow Appellant to be heard. This Court should not excuse such a flagrant violation as harmless.

II. The circuit court did not adopt the State's procedural arguments and neither should this Court.

The State argues that all three of Appellant's claims are untimely, procedurally barred, and do not meet the newly discovered evidence standard. The State made the same arguments in the circuit court, but the circuit court declined to adopt them and instead

addressed the merits of Appellant's claims. This Court should take the same approach because Appellant's Rule 3.851 motion included valid reasons why all three of his claims were timely and procedurally proper as newly discovered evidence claims. (PCR-3. 22-23).

A. Appellant's claims are timely

The State wrongly argues that these issues were discoverable at the time of Appellant's trial because "[a]ll of the facts regarding his jury selection, including the race and gender of the prospective jurors who were removed for being unalterably opposed to the death penalty were known to both Sparre and his trial defense attorney because they were present for, and participated in, that jury selection." AB 27-28. But the study was based on a critical mass of data that included capital trials that occurred after Appellant's trial, so the report inherently could not have been known at the time of trial. Appellant also could not have commissioned this study to occur contemporaneously with his trial, nor could he have anticipated that an analysis of subsequent capital trials would reveal a pervasive pattern of racial bias in Duval County's jury selection process.

Dr. Gau's study was not made public until it was filed in court in the Glover case on February 17, 2022. *See* Motion to Declare Death

Qualification Unconstitutional, *State v. Glover*, Case No. 16-2012-CF-6463-AXXX-MA (Duval Cty. Cir. Ct. February 17, 2022). So, at a minimum, the claims raised below could not have been discovered through due diligence until February 17, 2022. Appellant's claims were filed within one year of that date, on February 16, 2023. The study was later published on the ACLU's website for wider dissemination.[3]

B. Appellant's claims are not procedurally barred

The State contends that Sparre's claims are procedurally barred because each jury claim should have been raised on direct appeal. AB 30, 45, 59. But it would have been impossible for Sparre to raise these claims on direct appeal: most of the trials studied by Dr. Gau had not occurred yet, so the pattern of excluding Black jurors could not have been uncovered. The report also could not have been commissioned before—or during the trial—because the trials

[3] The State suggests Dr. Gau's report may have been published on the ACLU's website on September 7, 2021, before it was filed in the Glover litigation. AB 44, 65 n.14. Brian Stull, the ACLU attorney who commissioned the report, represented to Appellant's counsel that the report was not published until it was filed in the Glover litigation. To the extent the State believed the report was published earlier, an evidentiary hearing should have been held on the issue.

analyzed in the report had not happened yet. Dr. Gau's study is more than a "compilation of previously available information related to Florida's death penalty system," because it is a comprehensive analysis that reveals how Duval County juries become uncommonly willing to mete out death. *Rutherford v. State,* 940 So. 2d 1112, 1117 (Fla. 2006). Dr. Gau could not have analyzed the systemic racism present in Duval County jury selection without a sample set of multiple jury selections, the timing of which Appellant could exercise no control. He raised his claims based on the report at the earliest opportunity.

While the State contends that "a study of other jury selections in other capital cases is not case-specific evidence as to this case," AB 63, Dr. Gau's study relates specifically to Appellant's trial and Appellant has proffered the expert opinion of Michael Radelet which alleges how the conclusions reached in Dr. Gau's study would render his individual death sentence unconstitutional. (PCR-3. 52-54); *Rutherford v. State*, 940 So. 2d 1112, 1118 (Fla. 2006). Not only was Sparre's own trial used in the study itself, but Dr. Gau's findings were applied specifically to Sparre's trial by Radelet. (PCR-3. 52-54). Just like the case cited by the State, Dr. Gau's report is "case-specific" and

thus newly discovered evidence. *Wyatt v. State*, 71 So. 3d 86, 99 (Fla. 2011) (concluding a "case-specific" letter from the FBI regarding the testimony on comparative bullet lead analysis presented at defendant's trial was newly discovered evidence).

C. The State relies on the wrong newly discovered evidence standard

The State relies on the wrong standard for evaluating the materiality of Appellant's newly discovered evidence claims. AB 61-68. Because Appellant's claims regarding his jury are legal claims, they are governed by their relevant legal standards. *See Martin v. State*, 322 So. 3d 25, 37-38 (Fla. 2021). This Court's consideration of the claim on the merits must be governed by the standards articulated in *Martin*—standards designed to vindicate the defendant's right to an impartial jury—not by the standards set out in *Jones*. *Id.*; *Jones v. State*, 591 So. 2d 911 (Fla. 1991).

While the State analyzes materiality under *Jones*, this Court announced an exception to the general rule for prejudice regarding newly discovered evidence. Unlike *Jones* claims, which are premised purely on the "allegation that the jury did not hear previously unavailable evidence material to guilt or innocence," legal claims are

governed by the legal standards previously announced by this Court or the United States Supreme Court. Thus, in *Martin*, this Court analyzed the prejudice of the juror misconduct claim through the relevant legal standard. *Id.* at 37-38 (explaining this difference in the context of new evidence that establishes a violation of the right to an impartial jury).

Therefore, Appellant does not need to show that the newly discovered evidence would have "probably" resulted in acquittal or a lesser sentence, as the State incorrectly claims. AB 61. Instead, Appellant needs to show that the flaws in his jury selection "resulted in a denial of [his] right to an impartial jury." *Martin*, 322 So. 3d at 38. Though Appellee incorrectly analyzed Appellant's claims under the *Jones* standard, it acknowledged that the *Martin* standard is not only controlling but was applied by the circuit court. AB 68 n.16 ("The postconviction court thought that Sparre was required to establish either his conviction or death sentence was the result of actual bias on the part of the jury.").

III. The State failed to address Appellant's state-law claim under Article I of the Florida Constitution.

Regarding Appellant's claim under Article I of the Florida Constitution, the State repeats the mistake of the circuit court, focusing its analysis of Appellant's state-law claim on corresponding, but not controlling, case law under the federal constitution. Both the circuit court and the State failed to address any of the specific state-law arguments Appellant presented. The State asserts that the "same definition and analysis of an impartial jury" that applies to claims under the United States Constitution also "applies to the Florida constitution's impartial jury provision." AB 32. But that assertion has no basis in law. This Court has simply never interpreted Article I in the context of a claim like Appellant's.

While acknowledging that the circuit court summarily denied Appellant's claim without addressing the merits, the State argues that this Court should "address this issue regardless of the lack of a specific ruling from the lower court." AB at 25 n.8. But this Court should not decide these issues in the first instance or on the current record. This is an issue of first impression, and it would be more appropriate for this Court to remand and let the circuit court address

the issue before this Court does so. But if this Court does address the merits, it should find that Duval County's jury-selection process violated Appellant's right to an impartial jury under Article I.

Contrary to the State's argument, this Court would not have to overrule decades of caselaw—and the circuit court would not have to violate this Court's precedent—to find that Duval County's jury selection process violates Article I of Florida's Constitution. As the State artfully ignores, this Court's case law only addresses jury selection as it relates to the United States Constitution. Of the many cases cited by the State, not a single one commented on the inviolate right to an impartial jury under Florida's Constitution. *See Hawkins v. Wainwright*, 245 So. 2d 865, 866-67 (Fla. 1971) ("Petitioner contends that under *Witherspoon v. Illinois* . . . he has been denied his constitutional right to a fair and impartial jury."); *Perkins v. State*, 228 So. 3d 381, 392-93 (Fla. 1969) (same); *Witt v. State*, 342 So. 2d 497, 499 (Fla. 1977) (same); *Brown v. State*, 381 So. 2d 690, 693-694) (Fla. 1980) (same); *Engle v. State*, 438 So. 2d 803, 807-08 (Fla. 1983) (same); *Downs v. State*, 386 So. 2d 788, 790-91 (Fla. 1980) (addressing "allegation that he was denied an impartial jury under the sixth and fourteenth amendments.").

The State is correct that "an impartial jury does not mean a jury containing jurors unable to follow the law," but this misinterprets Appellant's Article I claim, which is based on racial discrimination in the jury selection process. And this Court already has an established procedure for evaluating racial discrimination in jury selection. In *State v. Neil*, this Court held that, although the "primary purpose of peremptory challenges is to aid and assist in the selection of an impartial jury," in light of the widespread use of peremptory challenges "solely as a scalpel to excise a distinct racial group from a representative cross-section of society," the racially discriminatory use of peremptory challenges "impedes, rather than furthers, article I, section 16's guarantee" of an impartial jury. 457 So. 2d 481, 486 (Fla. 1984). This Court has recognized that a defendant's right to an impartial jury triumphs over a modern practice with no basis in the original Florida Constitution, to the extent that it has been shown the modern practice is tainted by racial discrimination. The Court thus banned peremptory challenges based on race.

In light of the revelations in Dr. Gau's study, it is clear that the modern practice of capital jury selection in Duval County is fraught with racial bias. Radelet confirmed that this systematic racial bias

occurred at Appellant's trial. Yet the State does not account for the clear racial bias in the jury selection process, where Radelet confirmed the racial exclusion was "in some ways even stronger" than the study as a whole. (PCR-3. 53-55).

This Court should find that Appellant's Article I arguments are of sufficient merit to warrant further proceedings in the circuit court below, and remand with instructions for the court to hold a hearing and address the legal issues in the first instance.

IV. The State disregards Appellant's Eighth Amendment claim in favor of an irrelevant counterargument about jury mandated sentencing.

As to Appellant's Eighth Amendment claim, the State argues that because Florida's constitutional conformity rule requires this Court to interpret the Florida Constitution's cruel and unusual punishment clause in conformity with decisions of the United States Supreme Court, this Court must follow the Supreme Court's pronouncement that the Constitution does not require a jury's involvement in capital sentencing beyond the finding of one aggravating factor. AB 47-48 (citing *McKinney v. Arizona*, 589 U.S. 139, 145 (2020)).

The State's argument falls short for two reasons: first, Appellant is not arguing that jury sentencing is constitutionally mandated in capital cases; and second, applying the conformity clause here to skirt the underlying Eighth Amendment issue would undermine important aspects of this Court's judicial function and hinder national progress related to evolving standards of decency. *See, e.g., Hall v. Florida*, 572 U.S. 701, 708 (2014) ("The Eighth Amendment's protection of dignity… [affirms] that the Nation's constant, unyielding purpose must be to transmit the Constitution so that its precepts and guarantees retain their meaning and force.").

Distracted by the issue of jury sentencing, the State disregards Appellant's true claim that his trial violated the Eighth Amendment given the skewing effect of death disqualification as demonstrated in Dr. Gau's study. A jury that is demographically skewed due to death qualifications fails to adequately capture the standards of decency and to meaningfully consider mitigating evidence, while simultaneously tending to overvalue aggravation and misperceive mitigating evidence as aggravating.

Despite the State's arguments, a judgment to execute Appellant based on the verdict of a racially skewed jury, constitutes an

arbitrary outcome forbidden by the Eighth Amendment. This Court should reverse and remand to the circuit court for further factual development and a decision on the merits of Appellant's Eighth Amendment claim.

V. The State misconstrues Appellant's Sixth Amendment claim and discounts the magnitude of racial skewing in jury selection in Duval County.

The State incorrectly argues that Appellant's Sixth Amendment claim was meritless as a matter of law because (1) *Duren v. Missouri*, 439 U.S. 357 (1979), does not apply to the petit jury; and (2) death qualifying a jury does not violate the Sixth Amendment's right to an impartial jury under *Lockhart v. McCree*, 476 U.S. 162 (1986). The Court should reject both of these arguments.

The State echoes the circuit court in claiming that Appellant cannot establish a prima facie case of a violation of *Duren* because "prospective jurors who are opposed to the death penalty are not a 'distinctive group' for purposes of *Duren." Duren v. Missouri*, 439 U.S. 357 (1979); AB 71; (PCR-3. 189-91). This is a mischaracterization of Appellant's argument: jurors who are opposed to the death penalty are not the "distinctive group" at issue. Appellant's *Duren* challenge is instead based on the characteristics that the Supreme Court has

expressly recognized as cognizable: racial skewing. *Lockhart,* 476 U.S. at 175.

Dr. Gau's study establishes that potential Black and nonwhite jurors are disproportionately excluded during capital jury selection. (PCR-3. 39-50). Death qualification in Duval County capital cases excluded Black jurors at a rate nearly twice the rate of white jurors. Fully, 39% of Black Duval County citizens, and 43% of other nonwhite citizens, who answered the jury summons, posed no hardship basis for excusal, and were not subject to cause challenges for any other reason, were excluded for opposing the death penalty. (PCR-3. 48-49). Only 17% of white (but otherwise identically situated) jurors were disqualified. *Id.* This demonstrates that the representation of Black and nonwhite jurors is not fair and reasonable in relation to the number of Black and nonwhite citizens of Duval County. *See Duren*, 439 U.S. at 364.[4]

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[4] Once again, contrary to the State's repeated arguments that the "Gau jury study does not address the jury pool or present any statistics regarding the percentage of [B]lack [people] in Duval County," AB 54, 73, 74, the first page of the Gau study states that Black people comprise roughly 30% of Duval County's population, (PCR-3. 39).

As to the State's arguments regarding the final two *Duren* criteria, it bears repeating that (1) underrepresentation of Black and nonwhite jurors in Duval County is due to systematic exclusion of the group in the jury-selection process, and (2) once the defendant has established a prima facie showing, the State is under the burden to justify why the defendant's constitutional right to a jury drawn from a fair cross section of the community is outweighed by significant state interests. *Duren*, 439 U.S. at 364, 368.

The State also claims that Appellant's Sixth Amendment claim fails under *Lockhart*, but the factual underpinnings of *Lockhart* render it not applicable to this claim because it rejected a fair cross section challenge solely because it was based on an assertion that death qualifications disproportionately render a jury more prone to conviction at the guilt phase. Appellant does not argue that prospective jurors were excluded solely because of their opposition to the death penalty, but that a more nefarious and pervasive pattern of racial exclusion is at play in Duval County's jury selection process. *Lockhart*, 476 U.S. at 176-77 (explaining that excluding jurors solely based on their opposition to the death penalty is not a violation of the fair cross-section requirement).

Appellant's Sixth Amendment claim warranted at least a case management conference below to determine whether further factual development is necessary in light of the revelatory Gau study. The State and the circuit court misapplied federal law in evaluating Appellant's claims, and this Court should reverse and remand with instructions for further proceedings below.

CONCLUSION

This Court should reverse and remand with instructions that the circuit court hold a case management conference, allow factual development, and address the merits of both the state and federal claims consistent with the Florida and United States Constitutions.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that this brief was served by electronic service to all counsel of record on February 24, 2025.

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CERTIFICATE OF COMPLIANCE

I certify that this brief complies with the word-count requirement in Fla. R. App. P. 9.210(a)(2)(D) because it does not exceed 6,500 words or 25 pages, and the font requirement in Fla. R. App. P. 9.045(b) because it was computer-generated in Bookman Old Style 14-point.

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