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IN THE CIRCUIT COURT OF THE
17TH JUDICIAL CIRCUIT, IN AND
FOR BROWARD COUNTY, FLORIDA

STATE OF FLORIDA,

CASE NO. 18-1958CF10A

vs.

NIKOLAS CRUZ
Defendant.
_____________________________/

JUDGE: SCHERER

MOTION TO DISQUALIFY THE OFFICE OF THE STATE ATTORNEY FOR THE 17TH JUDICIAL CIRCUIT (D-98)

The Defendant, Nikolas Cruz, through counsel, makes this Motion to Disqualify the Office of the State Attorney for the 17th Judicial Circuit, from prosecuting this case, pursuant to the Fifth, Sixth, Eighth and Fourteenth Amendments to the United States Constitution, Article 1, Sections 2, 9, 16, 17, 21, and 22 of the Florida Constitution, and the Rules Regulating the Florida Bar 4-3.8 and 4-8.4 (2019). As grounds for this Motion, Mr. Cruz states:

SUMMARY OF MATERIAL FACTS

1. On March 7, 2018, Mr. Cruz was indicted on 17 counts of first-degree murder, and 17 counts of attempted first-degree murder, in relation to the February 14, 2018 shooting at Marjorie Stoneman Douglas High School. On March 13, 2018 and on April 16, 2018, the State filed a Notice of Intent to Seek the Death Penalty.

2. On February 7, 2019, lead defense counsel spoke with State Attorney Michael Satz regarding this case. Defense counsel asked Satz what other mitigating evidence he would consider in order to revisit his decision to seek the death penalty in this case.[1] Satz stated

[1] At the time, Mr. Cruz had consented to the release of his mental health and educational records, and those records were provided to the State of Florida.

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to defense counsel, in the presence of Public Defender Investigator Joel Maney, that there is no mitigating evidence he would consider and that he will not waive the death penalty in this case. Satz explained that he believes Mr. Cruz is "evil; worse than Ted Bundy."

3. On numerous occasions, the State Attorney's Office for the 17th Judicial Circuit has considered the presentation of mitigation evidence in capital cases, and has decided, based on that evidence, to withdraw its notice of intent to seek the death penalty against defendants.

4. As a matter of course in the Office of the State Attorney for the 17th Judicial Circuit, the decision to seek death or waive death, or, in fact, any decisions regarding plea offers for defendants charged with a homicide offenses, must be approved by Mr. Satz himself. Accordingly, no Assistant State Attorney would have the authority to consider a waiver of the death penalty in this case if presented with mitigating evidence by the defense.

5. There is precedent in the State of Florida for the removal of capital cases where the State Attorney has refused to consider *both* possible penalties for first-degree murder. *See Ayala v. Scott*, 224 So. 3d 755 (Fla. 2017) (governor had authority to remove all first-degree murder cases from Circuit where State Attorney categorically refused to consider seeking death penalty).

6. There is further evidence that Mr. Satz is in violation of his constitutional duty to consider any and all mitigation in this case. The Broward State Attorney's Office has contracted with SS Solution, a staffing agency located in Saint Augustine, Florida, for the purpose of retaining employees to participate in the trial in this case, because those employees would be legally prohibited from working directly for the SAO. Employees with the State of Florida that have entered and completed the DROP program are prohibited

from returning to State of Florida employment for one year, or their pension and retirement can be negatively impacted. The Broward State Attorney's office has contracted with this agency to employ the retired employees so as to not violate the terms of their retirement. SS Solutions currently employs two former SAO employees and will be employing two others, who either recently retired from the SAO,[2] or who are scheduled to retire this year,[3] so they can continue to assist him on this case during the one-year period of time in which they are statutorily prohibited from working for the State Attorney's Office immediately after retirement *See* http://www.miaminewtimes.com/news/broward-state-attorney-michael-satz-lets-top-employees-double-dip-into-pensions-11222295.

7. Satz's refusal to even consider mitigation evidence in the context of his decision to seek the death penalty in this case violates Mr. Cruz's due process rights and his right to be free of cruel and unusual punishment. Additionally, it is an abuse of Satz's prosecutorial discretion, and violates the ethical rules governing prosecutors.

5. A memorandum of law in support of this motion is attached hereto and incorporated herein by this reference.

ARGUMENT

1. This Court has the authority to disqualify the State Attorney's Office for the 17th Judicial Circuit from prosecuting this case.

A trial court's authority to disqualify a lawyer or a law firm derives from its inherent power to control the conduct of all persons connected with judicial proceedings before it.

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[2] ASA Carolyn McCann retired in March and is currently employed by SS Solutions at a salary of $112,500 per year in addition to her lump sum payment and $60.000 per year pension.

[3] ASA Jeff Marcus, ASA Tim Donnelly retire this year as well and will be also receive a salary from SS Solutions, a lump sum payment upon retirement and their pensions.

Stewart v. Bee-Dee Neon & Signs, Inc., 751 So. 2d 196 (Fla. 1st DCA 2000). *See also*, *Miami Herald Pub. Co. v. Lewis*, 426 So. 2d 1 (Fla. 1982) (Courts have inherent power to preserve order and decorum in courtroom, to protect rights of parties and witnesses, and generally to further administration of justice).

Florida courts have ruled on motions to disqualify an individual State Attorney, Assistant State Attorney, or even entire State Attorney's Offices for a particular circuit. *See, e.g.*, *Castro v. Sate*, 597 so 2d 259 (Fla. 1992) (trial court should have disqualified Fifth Judicial Circuit State Attorney's Office from prosecuting defendant's case where prosecuting attorney, knowing that defendant's former public defender had been hired by State Attorney's Office, called him and discussed motions pending in defendant's case); *Fitzpatrick v. State*, 464 So. 2d 1185 (Fla. 1985); *Nunez v. State*, 665 So. 2d 301 (Fla. 4th DCA 1995) (individual Assistant State Attorney disqualified from prosecuting defendant, but not entire office); *Reaves v. State*, 574 So. 2d 105 (Fla. 1991) (reversal of conviction where motion to disqualify prosecutor should have been granted); *Popejoy v. State*, 597 So. 2d 335 (Fla. 3d DCA 1992).

Disqualification is a prophylactic remedy for likely future prejudice, not a punishment for past wrongdoing. *Blake v. State*, 180 So. 2d 89 (Fla. 2014). Generally, defendant must show substantial misconduct or actual prejudice to disqualify a State Attorney's Office. *Downs v. Moore*, 801 So. 2d 906, 914 (Fla. 2001); *Nunez v. State*, 665 So. 2d 301, 302 (Fla. 1995) (citing cases). However, even the "appearance of impropriety created by certain situations may demand disqualification" of a State Attorney without demonstrating actual prejudice. *Rogers v. State*, 783 So. 2d 980, 991 (Fla. 2001); *Huggins v. State*, 889 So. 2d 743, 768 n.13 (Fla. 2004). When actual prejudice is, in fact, shown, a

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motion for disqualification should be granted. *Nunez*, 665 So. 2d at 302; *State v. Clausell*, 474 So. 2d 1189, 1191 (Fla. 1985); see also *State v. Fields*, 954 So.2d 1218, 1220 (Fla. 3d DCA 2007) (a party seeking disqualification of the State Attorney's Office must demonstrate actual prejudice). Disqualification of a prosecutor is proper when "it is necessary to prevent the accused from suffering prejudice that he otherwise would not bear." *State v. Hayes*, 997 So. 2d 446, 449 (Fla. 4th DCA, 2009) (quoting *Huggins*, 889 So. 2d 743 at 768 (internal marks omitted).

Only two years ago the Florida Supreme Court upheld the Governor's removal of all death penalty eligible first-degree murder cases from the Office of the State Attorney for the Ninth Circuit, because the elected State Attorney refused to consider seeking the death penalty in any and all eligible cases. *Ayala v. Scott*, 224 So. 3d 755 (Fla. 2017). The Governor's action was predicated on § 27.14(1), Fla. Stat., which provides that:

> (1) If any state attorney is disqualified to represent the state in any investigation, case, or matter pending in the courts of his or her circuit or if, for any other good and sufficient reason, the Governor determines that the ends of justice would be best served, the Governor may, by executive order filed with the Department of State, either order an exchange of circuits or of courts between such state attorney and any other state attorney or order an assignment of any state attorney to discharge the duties of the state attorney with respect to one or more specified investigations, cases, or matters, specified in general in the executive order of the Governor.

Denying the State Attorney's petition for a writ of *quo warranto*, the Court explained that "the reassignments are predicated upon 'good and sufficient reason,' namely Ayala's blanket refusal to pursue the death penalty in any case despite Florida law establishing the death penalty as an appropriate sentence under certain circumstances." *Id*. at 758. The Court went on to "decline the invitation" to view the case as a "power struggle over prosecutorial discretion," because "by effectively banning the death penalty in the Ninth

Circuit – as opposed to making case-specific determinations as to whether the facts of each death-penalty eligible case justify seeking the death penalty—Ayala has exercised no discretion at all." *Id*. Citing the Court of Appeals of New York, our Supreme Court concluded that "adopting a 'blanket policy" against the imposition of the death penalty is "in effect refusing to exercise discretion" and tantamount to a "functional[ ] veto" of state law authorizing prosecutors to pursue the death penalty in appropriate cases. *Id*., quoting *Johnson v. Pataki*, 91 N.Y.2d 214, 668 N.Y.S.2d 978, 691 N.E.2d 1002, 1007 (1997).

Notably, in its amicus brief in support of the Governor in *Ayala v. Scott*, the Florida Prosecuting Attorneys Association wrote:

> Additionally, Ms. Ayala lacks the authority to disregard consideration of the death penalty in all cases. Specifically, Florida Statute § 921.141 *requires the State Attorneys to weigh the mitigating and aggravating circumstances of a crime before affirmatively declining to seek the death penalty.*

Brief for the Governor of Florida as Amicus Curiae, p. 7-8, *Ayala*, 224 So. 3d 755. (emphasis added)

This case is simply the inverse of the *Ayala* case. Here, State Attorney Satz is refusing to exercise his discretion by foreclosing the possibility of considering any mitigation evidence traditionally utilized by prosecutors in making the solemn and difficult decision of whether to seek the death penalty in a given case. Although Satz has the authority to make the ultimate decision, he is constitutionally and ethically required to consider not just the aggravating factors present in the crime itself, but the mitigating circumstances of the defendant's life and background. In other words, he must make the decision based on constitutional, statutory and ethical rules, not his personal opinion.

2. State Attorney Satz is constitutionally required to consider any and all mitigating circumstances in determining whether to seek the death penalty in this case.

The Eighth Amendment is concerned with nothing less than the "dignity of man." *Trop v. Dulles*, 356 U.S. 86, 100 (plurality opinion). "While the State has the power to punish, the [Eighth] Amendment stands to assure that this power be exercised within the limits of civilized standards." *Id*. This constitutional principle of respect for a person's uniqueness necessitates an *individualized decision* to determine the correct punishment, focusing not solely on a crime, but also considering a person's background and character. *See Lockett v. Ohio*, 438 U.S. 586, 604 (1978)(emphasis added); *see also Penry v. Lynaugh*, 492 U.S. 302, 319 (1989) ("[E]vidence about the defendant's background and character is relevant because of the belief, long held by this society, that defendants who commit criminal acts that are attributable to a disadvantaged background . . . may be less culpable"); *Gregg v. Georgia*, 428 U.S. 153, 189 (1972) (quoting *Pennsylvania ex rel. Sullivan v. Ashe*, 302 U.S. 51, 55 (1937)(internal marks omitted) ("Justice generally requires that there be taken into account the circumstances of the offense together with the character and propensities of the offender."); *Woodson v. North Carolina*, 428 U.S. 280, 304 (1976) (plurality opinion) ("[I]n capital cases the fundamental respect for humanity underlying the Eighth Amendment . . . requires consideration of the character and record of the individual offender and the circumstances of the particular offense as a constitutionally indispensable part of the process of inflicting the penalty of death."); *Roberts v. Louisiana*, 428 U.S. 325, 333-34 (1976) (mandatory death sentences for first degree murder "afford no meaningful opportunity for consideration of mitigating factors presented by the circumstances of the particular crime or by the attributes of the individual offender.").

The need for an individualized decision in a capital case is of such constitutional importance that the United States Supreme Court has routinely found death penalty attorneys ineffective for failing to investigate their clients' life histories. *See, e.g., Porter v. McCollum*, 558 U.S. 30, 43-44 (2009); *Rompilla v. Beard*, 545 U.S. 374 (2005); *Wiggins v. Smith*, 539 U.S. 510, 536 (2003); *Williams v. Taylor*, 529 U.S. 362 (2000). Moreover, each discretionary actor in a capital case acts as a "safety valve" because they may find that the death penalty is not the just punishment for a defendant based on his background and character. *Gregg v. Georgia*, 428 U.S. 153, 199 (1976) (plurality).

Similarly, a defendant should prevail on an Eighth Amendment arbitrariness claim if he makes a prima facie showing that the prosecutor is seeking the death penalty based on an arbitrary classification, and "defendants should be entitled to present evidence of this type of arbitrary decision making in a pretrial, adversarial proceeding, in order to force the prosecutor to justify his decisions on the record, and preserve the claim for review." Amanda S. Hitchcock, *Using the Adversarial Process to Limit Arbitrariness in Capital Charging Decisions*, 85 N.C. L. Rev. 931, 966 (2007). A prosecutor violates the Fourteenth Amendment's equal protection clause if he or she selectively enforces a law against an individual based on an arbitrary classification. *Oyler v. Boles*, 368 U.S. 448, 456 (1961); *Bell v. State*, 369 So. 2d 932, 934 (Fla. 1979) (same).

No type of crime, regardless of its nature, automatically dictates that the death penalty is the correct punishment for an individual. *Lockett*, 438 U.S. at 602; *see also Woodson* 428 U.S. at 292-93 ("The history of mandatory death penalty statutes in the United States thus reveals that the practice of sentencing to death all persons convicted of a particular offense has been rejected as unduly harsh and unworkably rigid."); *Roberts*,

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428 U.S. at 333 ("The constitutional vice of mandatory death sentence statutes -- lack of focus on the circumstances of the particular offense and the character and propensities of the offender -- is not resolved by Louisiana's limitation of first-degree murder to various categories of killings.").

There is a constitutionally unacceptable risk that the death penalty is being sought arbitrarily against Mr. Cruz. *McCleskey*, 481 U.S. at 307 (quoting *Gregg*, 428 U.S. at 199). First, the Eighth Amendment requires that the State Attorney make his decision to seek the death penalty for Mr. Cruz based on standards, namely the consideration of applicable mitigating circumstances, and not solely the facts of the crime. Second, the term "evil" is an arbitrary classification, as there is no one definition or person to whom everyone would agree the term applies. Third, § 921.141(6) lays out the *only* aggravating factors that a death sentenced can be based upon; evil is not one of those factors. The word "evil" is only used in the death penalty jury instructions to define "heinous" for the "especially heinous, atrocious and cruel," aggravator. *See* Fla. Std. Jury Instr. 7.11. ("Heinous" means extremely wicked or shockingly evil."). The reference to "evil" in the instructions, however, is to the way in which the crime was committed, not the person committing it. *Id*.

Satz's refusal to consider mitigation in Mr. Cruz's case he believes Mr. Cruz is "evil" is a violation of both the State Attorney's constitutional and ethical duties. Being "evil" is not a statutory aggravator, and cannot serve as a basis for seeking the death penalty. Mr. Satz is clearly looking outside of the statutory requirements and imposing his own personal beliefs, thereby failing to exercise sound discretion.

Finally, other individuals who are prosecuted in the 17th Judicial Circuit of Florida have the opportunity to present mitigation evidence to the Office of the State Attorney. The

State Attorney's refusal to consider any mitigation evidence violates Mr. Cruz's Eighth and Fourteenth Amendments rights. Accordingly, Mr. Cruz suffers actual prejudice from Satz's refusal to consider any mitigating circumstances regarding his background and character. Moreover, as Satz will be the ultimate decision maker regarding the death penalty in this case, regardless of which Assistant State Attorney prosecutes the case, the entire Office of the State Attorney for the 17th Judicial Circuit should be disqualified from prosecuting Mr. Cruz.

3. State Attorney Satz is ethically required to consider any and all mitigating circumstances in determining whether to seek the death penalty in this case.

As a prosecutor, the citizens of Florida give the State Attorney "an awesome and sacred trust. "[Prosecutors] alone possess the authority to institute the sole state-sanctioned process through which a citizen's liberty and life may legally be ended. Not surprisingly, the grant of such staggering power carries with it commensurate responsibilities." *People v. Dasaky*, 709 N.E.2d 635, 649 n.3 (Ill. App. Ct. 1999).

The Florida Bar adopted the American Bar Association Standards of Criminal Justice Relating to Prosecution Function. *See* Comment, R. Regulating Fla. Bar 4-3.8 (2019). The ABA Standards emphasize the special role of a prosecutor in our criminal justice system. The duty of the prosecutor is to seek justice and not merely a conviction. ABA Standard 3.1-2(b) (2018); *see also* Comment, R. Regulating the Fla. Bar 4-3.8. This duty is imposed on a prosecutor because he or she is an administrator of justice, an advocate, and an officer of the court. ABA Standard 3.1-2(a). When seeking justice, the prosecutor must exercise sound discretion, ABA Standard 3.1-2(a), and, should not use

other improper considerations, such as partisan or political or personal considerations, in exercising prosecutorial discretion. ABA Standard 3.1-6(a).

Moreover, a "prosecutor should be open, at every stage of a criminal matter, to discussions with defense counsel concerning disposition of charges by guilty plea or other negotiated disposition." ABA Standard 3.5-6(a). Finally, a prosecutor "should consider factors listed in Standard 3-4.4(a), and not be influenced in disposition discussions by inappropriate factors such as those listed in Standards 3-1.6 and 3-4.4(b)." Factors listed in Standard 3-4.4(a) include the impact of prosecution or non-prosecution on the public welfare; the background and characteristics of the offender, including any voluntary restitution or efforts at rehabilitation; the views and motives of the victim or complainant; any improper conduct by law enforcement; potential collateral impact on third parties, including witnesses or victims and the fair and efficient distribution of limited prosecutorial resources. Those factors which are not to influence disposition discussions include: partisan or other improper political or personal considerations and hostility or personal animus towards a potential subject, or any other improper motive of the prosecutor

In addition, the State Attorney has a continuing ethical duty to discover and produce mitigating evidence. *Brady v. Maryland*, 373 U.S. 83, 87 (1963); *Kyles v. Whitley*, 514 U.S. 419, 421 (1995); *see also State v. Kadivar*, 460 So.2d 391, 395 (Fla. 4th DCA 1985) (prosecutor's ethical obligations require that he or she should "disclose to the accused evidence that would lessen the guilt, mitigate the offense or reduce the punishment, and should not fail to pursue evidence that may damage his case or aid the case of the accused."); ABA Standard 3-5.4 (a) ("After charges are filed if not before, the prosecutor

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should diligently seek to identify all information in the possession of the prosecution or its agents that tends to negate the guilt of the accused, mitigate the offense charged, impeach the government's witnesses or evidence, or reduce the likely punishment of the accused if convicted."). Because the State Attorney clearly misapprehends the constitutional significance of mitigation evidence, as well as his ethical duty regarding the consideration of mitigating circumstances in the context of a resolution to the case, there is a constitutionally significant risk that he will be unable to fulfill his duties concerning disclosure of potential mitigating evidence to defense counsel.

Satz has failed in fulfilling his ethical duties as a State Attorney because he is refusing to consider any evidence regarding Mr. Cruz's background and characteristics, and is instead, proceeding based on his personal opinion and animus toward Mr. Cruz. Accordingly, he should be removed as prosecutor on this case.

Satz's refusal to consider mitigating circumstances that warrant a sentence of life without the possibility of parole fails to satisfy the appearance of justice. A bedrock principle of our courts is the idea that "justice must satisfy the appearance of justice." *Offutt v. United States*, 348 U.S. 11, 14 (1954). It is of "vital importance to the defendant and to the community that any decision to impose the death sentence be, and appear to be, based on reason rather than caprice or emotion." *Gardner v. Florida*, 430 U.S. 349, 358 (1977); *see also Ayala*, 224 So. 3d a 762 (Pariente, J., dissenting) (opining that the State Attorney did not make decision whether to seek death on emotion). "A prosecutor should act not as a partisan eager to convict, but as an officer of the court, whose duty it is to aid in arriving at the truth in every case." E. Michael McCann, *Opposing Capital Punishment: A*

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Prosecutor's Perspective, 79 Marq. L. Rev. 649, 672 (1996). Satz's actions are not based on reason, but emotion.

Satz's decision to circumvent the DROP/retirement system, and allow four of his staff to continue working as employees of a private company during the year they are prohibited from working for the State Attorney's Office after retirement, likewise fails to satisfy the appearance of justice." The appearance of justice requires Satz to consider any and all mitigation presented to him in making the determination of whether to continue to seek the death penalty, or to accept the standing offer made by Mr. Cruz to waive trial/appeals in exchange for 34 consecutive life sentences. Even if Satz's reason for refusing to consider any mitigating circumstances is not to continue the profitable employment of individuals in his office close to him, and even his own after his term expires, it appears so. That the failure to satisfy the appearance of justice extends beyond just Satz, requires disqualification of the entire Office of the State Attorney for the 17th Judicial Circuit.

The State Attorney's determination that Mr. Cruz is evil does not appear to be a reasoned decision but instead a decision based on caprice and emotion. He fails to fulfill his duty to arrive at the truth in Mr. Cruz's case by insisting on remaining blind to any evidence that contradicts his own conclusion that Mr. Cruz is evil. *See State v. Kadivar*, 460 So.2d 391, 395 (Fla. 4th DCA 1985). The State Attorney's refusal to make an individualized determination of the appropriate punishment for Mr. Cruz, despite constitutional and ethical requirements, has the "appearance of impropriety" that necessitates his disqualification as well as that of the entire Office. *See Rogers*, 783 So. 2d at 991; *Huggins*, 889 So. 2d at 768 n.13.

CONCLUSION

The State Attorney fails to fulfill his ethical duty of seeking justice by denying Mr. Cruz a crucial constitutional safeguard to ensure that in addition to applicable aggravating factors, all mitigating circumstances are properly considered to impose the death penalty. It is substantial misconduct to fail to fulfill his constitutional and ethical duties, and therefore he should be disqualified from prosecuting Mr. Cruz. *See Downs*, 801 So. 2d at 914. Moreover, as no Assistant State Attorney working under Satz would have the authority to accept Mr. Cruz's offer of 34 consecutive life sentences in exchange for a guilty plea without Satz's approval, the entire office of the State Attorney for the 17th Judicial Circuit must be disqualified from prosecuting this case.

WHEREFORE, Mr. Cruz moves this Honorable Court for an order Disqualifying the Office of the State Attorney for the 17th Judicial Circuit, and for the appointment of another State Attorney or Assistant State Attorney in another Circuit to prosecute this matter.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by e-service to the Office of the State Attorney, Michael Satz, at courtdocs@sao17.state.fl.us, Broward County Courthouse, Fort Lauderdale, Florida, this August 30, 2019.

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