IN THE SUPREME COURT OF FLORIDA

CASE NO. SC21-651
District Court Case No. 1D20-2193

CITY OF TALLAHASSEE, FLORIDA, et al.,

Petitioners,

v.

FLORIDA POLICE BENEVOLENT ASSOCIATION, INC., et al.,

Respondents.

ON REVIEW FROM THE DISTRICT COURT OF APPEAL
FIRST DISTRICT OF FLORIDA

PETITIONER NEWS MEDIA COALITION'S REPLY BRIEF ON THE MERITS

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In their Answer Brief ("AB"), Respondents' argument is largely twofold. First, they forward a simplistic argument that "person" always includes literal "human beings" when that term appears in the law. They further conclude that such "persons" can always be Marsy's Law "victims." They then make an emotional plea, urging this Court to grant "victim" status to the Doe Officers because they allegedly feared for their lives while on duty—both before and after the fatal police shootings of their so-called civilian "victimizers." Straying from the legal issues and ignoring the fact that the City of Tallahassee also disagrees with their position, Respondents then attempt to cloud the issues by casting the News Media Coalition as motivated to publish pre-constructed narratives negatively portraying both officers. While in certain circles it may be in vogue to broadly attack the news media as fake news and anti-police, this assault has nothing to do with the issues facing the Court.

This appeal distills down to two realities: (1) the Doe Officers' actions were official police actions subject to public scrutiny, but their names have been secreted in public records about two deadly force incidents; and (2) their alleged "victimizers" both died at the hands the Doe Officers, meaning no criminal proceedings will incept. Marsy's Law's express purposes are

not implicated under these facts, and the Doe Officers cannot be classified as "victims." Moreover, even if Marsy's Law could apply, it cannot reasonably be read to bestow perpetual anonymity on true "victims" because such identities are never secret when the accused has the right to confront their accuser. Nonetheless, Respondents urge the opposite: perpetual anonymity they can unilaterally claim by deeming themselves "victims," avoiding public scrutiny of deadly official actions. Their claims of fear are also undermined by the reality that the deceased can never pose any future threat to them.

Marsy's Law cannot be reflexively applied in an extreme manner. Its protections incept in specific circumstances, with those very same protections potentially evolving—and perhaps even disappearing—over time. Likewise, Marsy's Law does not automatically trump the public's constitutional right of access to public records that ensures public examination of government actions. These realities implicitly reflect the limits of Marsy's Law anonymity.

I. This Court Should Reject Respondents' Overly Simplistic Interpretation of Marsy's Law.

In their Answer Brief, Respondents invite this Court to reject well-established principles of statutory interpretation, ignore context entirely, and disregard the clearly stated purpose within the provision's very text.

Respondents' asserted interpretation fails for at least the following three reasons. First, Respondents (and the appellate court below) misread the exception in Article I, Section 24(a) of the Florida Constitution as subservient to Marsy's Law. Second, Respondents' argument inappropriately focuses on the definition of "person" when the term "victim" within the Marsy's Law context must also be considered. Finally, Respondents refuse to view the term "victim" within that surrounding context, as the law requires, to resolve ambiguities in its definition.

A. Marsy's Law is Not an Exemption to Article I, Section 24(a) of the Florida Constitution.

Respondents assert that the appellate court correctly held that the rights in Marsy's Law, Article I, Section 16(b), do not conflict with the public's right to access government records in Article I, Section 24(a), and that Section 16(b)(5) operates as an explicit exemption to Section 24(a). (AB-41). This is wrong.

Section 16(b)(5), the disclosure provision at issue here, provides a "victim" with the "*right to prevent* the disclosure of information or records that could be used to locate or harass the victim or the victim's family, or which could disclose confidential or privileged information of the victim." Art. I, § 16(b)(5), Fla. Const. (emphasis added). This "right to prevent" is a subject of ambiguity itself as two interpretive camps have emerged: one

claiming this right "automatically" incepts, the other claiming a "victim" must affirmatively exercise the right. Further, as discussed below, it is by no means settled what entities, types of "persons," and situations where this provision of Marsy's Law applies (much less how long it endures or when it may be waived). Marsy's Law is rife with ambiguity and provides no meaningful guidance or predictability as to when and how the subject provision operates.

Section 24(a) commands precision:

> Every person has the right to inspect or copy any public record made or received in connection with the official business of any public body, officer, or employee of the state, or persons acting on their behalf, except with respect to records exempted pursuant to this section or *specifically made confidential* by this Constitution.

Art. I, § 24(a), Fla. Const. (emphasis added). Without the required specificity, Marsy's Law cannot be read to exempt records from disclosure.

Respondents also allege, without any real citation to authority, that "[h]armonization necessarily involves an acknowledgment that [the News Media's] preferred provision is subordinate." (AB-42). This is not what the law mandates. First, as described above, Section 24(a) cannot be subservient to Section 16(b). Second, a provision is subordinate only if it involves a similar subject addressed by a more specific law on the same topic. *See generally State Farm Mut. Auto. Ins. Co. v. Nichols*, 932 So. 2d

1067, 1073 (Fla. 2006). For example, Article 10, Section 29(d)(4) covers a subject similar to public records access, but articulates that particular "records containing the identity of qualifying patients *shall be confidential…*" *See* Art. X, § 29(d)(4). Such specificity is noticeably absent from Marsy's Law.

Third, Respondents' assertion that harmonization is not necessary again fails. (AB-42). As the News Media Coalition argued in its Initial Brief ("IB"), harmonization is necessary to give effect to the purposes of both constitutional provisions. (IB-17-18). *Benjamin v. Tandem Healthcare, Inc.*, 998 So. 2d 566, 570 (Fla. 2008) ("we must give effect to every provision and every part thereof."); *Wilson v. Crews*, 34 So. 2d 114, 118 (Fla. 1948) (distinct constitutional provisions cannot be harmonized "only when they relate to the same subject, are adopted for the same purpose, and cannot be enforced without material and substantial conflict."); *State v. Butler*, 69 So. 771, 779 (Fla. 1915). Here, the timing of their adoption is irrelevant because, as described above, the two constitutional provisions address entirely different subjects and were by no means adopted for the same purpose. They, therefore, can and should be harmonized.

B. Finding Anyone Can Self-Identify as a Marsy's Law Victim Leads to Absurd Outcomes.

The question before this Court is whether an on-duty law enforcement officer's actions can qualify them as a "victim" guaranteed anonymity under their interpretation of Marsy's Law. Respondents ignore what it means to be a "victim" and rather submit that because a law enforcement officer is literally a "person," they can invoke the Marsy's Law disclosure provision.[1] (AB-23-27). This argument misses the mark.

While a "person" can be a "victim" under Marsy's Law, it must be remembered that Marsy's Law is concerned with protecting victims of crime who can assert a panoply of rights under Section 16(b). *See* Art. I, § 16(b)(1)-(11), Fla. Const. And who (or what) should qualify as a "victim" requires consideration of Marsy's Law's purpose:

> To preserve and protect the right of crime victims to achieve justice, ensure a meaningful role throughout the criminal and juvenile justice systems for crime victims, and ensure that crime victims' rights and interests are respected and protected by law in a manner no less vigorous than protections afforded to criminal defendants and juvenile delinquents….

Art. I, § 16(b), Fla. Const.

[1] This is because a "victim" is defined as "a person who suffers direct or threatened physical, psychological, or financial harm as a result of the commission or attempted commission of a crime… [but] does not include the accused." Art. I, § 16(e), Fla. Const.

The above of course all contemplates that a "victim" is one who is involuntarily required to participate in the criminal process by virtue of a crime being committed against them, and one who will be afforded equal footing with the criminally accused. There is no indication in Marsy's Law that its provisions apply to anonymize law enforcement officers performing law enforcement duties. The clear intent is to put regular citizens on par with criminal defendants as the criminal process unfolds. The Doe Officers are the government (part of the criminal justice process) and have no need to create a special relationship with prosecuting authorities. Again, here there is no prosecution. Put plainly, considering what Marsy's Law is designed to achieve, when there is no longer a "victimizer" there logically can no longer be a "victim," especially where government action is involved.

It also stands to reason, as pointed out in Sheriff Gualtieri's amicus brief, that the Doe Officers cannot be "victims" because they acted offensively as aggressors to shoot and kill two civilians. (Gualtieri Amicus Brief at p. 6-7). Thus, they stand as potential "accuseds" and cannot claim victim status. (*Id.* at p. 7-8). The above all serves to illustrate the nuance and context-specific approach this Court must apply to determining the scope of Marsy's Law.

Respondents avoid context and largely rest their legal argument on a single case that was never cited by the appellate court below, *State v. Peraza*. In *Peraza*, this Court held that a law enforcement officer is entitled to seek pre-trial immunity from criminal prosecution under Florida Statute Sections 776.012(2) and 776.032 (Florida's "Stand Your Ground" law) for actions taken while on duty. *State v. Peraza*, 259 So. 3d 728, 731 (Fla. 2018). In the context of "Stand Your Ground," this Court found that that the term "person" meant "human beings." *Id.* The Court held, therefore, that because law enforcement officers are human beings, they can claim this immunity,[2] in addition to the trial defense granted specifically to law enforcement personnel in Florida Statute Section 776.05. *Id.*

Respondents claim this holding ends the Court's inquiry. (AB-24-25). But *Peraza* is distinguishable. First, the Court in *Peraza* was not tasked with defining "person" in the context of a law specifically setting out its policy goals and scope, as Marsy's Law does. As noted above, the "person = human being" holding from *Peraza* breaks down when translated to Marsy's Law. Additionally, the officer in *Peraza* was defending himself in

[2] The operative statutes read, in part: (1) "a person is justified in the use of deadly force and does not have a duty to retreat if…"; and (2) "[a] person who uses deadly force as permitted in s. 776.012, s. 776.013, or s. 776.031 is justified in using such force and is immune from criminal prosecution…." *See Peraza*, 259 So. 3d at 731.

his *individual* capacity against criminal charges brought by the state. That situation is very different from one in which an individual invokes the authority of government as its agent and acts with deadly force in the scope of duty. The News Media Coalition here asserts that law enforcement officers, in their *official* capacity as agents of government, cannot be "victims" for purposes of anonymity. That is not the same as a law enforcement officer seeking to raise a defense in a criminal prosecution where he is the defendant facing jail time.

Respondents' additional reliance on the definition of "person" found at Section 1.01(3) of the Florida Statutes only further exposes that "person" can mean various things. It provides a fairly extensive list of who or what may be a "person" generally under the law,[3] notably excluding any reference to government entities or their agents. Naturally, that definition would make no sense in, for example, the "Stand Your Ground" context. "Trusts" and "joint adventures" would never assert a "Stand Your Ground" defense, much less be prosecuted for manslaughter as was Deputy Peraza. Again, context matters.

[3] That section of law defines a "person" to include "individuals, children, firms, associations, joint adventures, partnerships, estates, trusts, business trusts, syndicates, fiduciaries, corporations, and all other groups or combinations." *See* § 1.01(3), Fla. Stat. (2021).

Such ambiguities require courts to look to a law's purpose in defining its contours. *See Greenfield v. Daniels*, 51 So. 3d 421, 426 (Fla. 2010) (where a term "appears to be capable of several different meanings, a level of ambiguity exists in the statute that justifies our further investigation into the purpose and intent of the enactment."); *State v. Huggins*, 802 So. 2d 276, 277 (Fla. 2001) ("Ambiguity suggests that reasonable persons can find different meanings in the same language.")

Finally, contrary to Respondents' assertion (AB-26), in *Department of State v. Hollander*, this Court did suggest that the term "victim" was ambiguous. In *Hollander*, the appellees challenged the ballot summary for the Marsy's Law constitutional amendment, claiming that it did "not inform voters that the term 'victims' could possibly be construed to include corporations." *Dep't of State v. Hollander*, 256 So. 3d 1300, 1311 (Fla. 2018). This Court dismissed the challenge, finding that "this is a complaint about an *ambiguity of the text* of Amendment 6 rather than a complaint regarding the nature of the summary. Nothing in Amendment 6 states whether or not crime victims includes corporations…" *Id.* (emphasis added). The Court further held that it would not strike a ballot summary based on an argument "concerning 'the ambiguous legal effect of the amendment's text.'" *Id.*

Again, the fact that the term "victim" might include corporations indicates that it is ambiguous, and it is therefore appropriate for this Court to examine meaning and intent. Even were "corporations" deemed included, not all the enumerated rights could even apply. For example, corporations themselves have no personal safety concerns and do not have families. Marsy's Law rights in Sections 16(b)(4), 16(b)(5), and 16(b)(6)d. make little sense when applied to corporations. Again, this further illustrates that interpreting Marsy's Law in a monolithic fashion to include the world leads to absurd results that no reasonable person would have ever anticipated when it passed.

C. Principles of Construction Require this Court to Consider Context.

Respondents ask this Court to divorce the definition of "victim" from its greater context and to isolate the word "person." (AB-20). But this approach would run counter to well-established law prohibiting courts from reading words in isolation and requiring they be examined "in their context." *See Advisory Op. to Gov. re: Implementation of Amend. 4, The Voting Restoration Amend.*, 288 So. 3d 1070, 1078 (Fla. 2020); *Bd. of Trs., Jacksonville Police & Fire Pension Fund v. Lee*, 189 So. 3d 120, 125 (Fla. 2016) (in reviewing an ambiguity a court must "consider the statute as a whole, including the evil to be corrected, the language, title, and history of

its enactment, and the state of law already in existence on the statute."); *Sch. Bd. of Palm Beach Cty. v. Survivors Charter Schs., Inc.*, 3 So. 3d 1220, 1234-35 (Fla. 2009) (when dealing with an entire statutory scheme, "we do not look at only one portion of the statute in isolation but we review the entire statute to determine intent" and are "not required to abandon either our common sense or principles of logic in statutory interpretation.").

And while professing the meaning of Marsy's Law is straightforward, Respondents direct this Court to an "outside source of intent," a statement by the spokesperson for the Marsy's Law for Florida advocacy group that police officers can be victims of crimes. (AB-29). This cannot supplant the text of Marsy's Law itself, which offers the most authoritative source of intent. *See Fla. Farm Bureau Cas. Ins. Co. v. Cox*, 967 So. 2d 815, 820 (Fla. 2007).

As noted earlier, Marsy's Law is designed to provide crime victims a meaningful role as their accused proceeds through the criminal process. Section 16(d) of Marsy's Law reiterates this intent and also states that the "provisions of this section apply throughout criminal and juvenile justice processes." Art.1, § 16(d), Fla. Const. This is further made clear in Section 16(b)(3), which specifically refers to law enforcement separate and apart from crime victims: "nothing contained herein is intended to create a special

relationship between the crime victim and any law enforcement agency or office absent a special relationship or duty as defined by Florida law." *Id.* at § 16(b)(3). And in *Hollander*, this Court emphasized that the ballot summary accurately informed voters of the "chief purpose" of the proposed amendment, which was that it "[c]reates constitutional rights for victims of crime; requires courts to facilitate victims' rights; authorizes victims to enforce their rights throughout criminal and juvenile justice processes." *Hollander*, 256 So. 3d at 1307-08. It clear then that "victim" should be interpreted within this framework.

Respondents claim that such a reading unfairly grants victims whose victimizers are alive greater protections than those whose victimizers are dead. (AB-31). This makes perfect sense. Ironically, Respondents' reading would grant *greater* anonymity rights to those who kill their alleged victimizers—in this case acting for government[4]—in perpetuity. Marsy's Law cannot be designed to offer rights to those who will not be participating in the criminal process and face no further threat from their alleged victimizer.

[4] The Doe Officers appear, however, to want to have it both ways. Respondents admit that the officers' actions were taken while on duty and in response to emergency calls for service, but then claim that that the crimes were committed against them "individually." (AB-26).

II. Law Enforcement Names are Central to Transparency.

Respondents admit that Section 16(b) does not expressly mention "names." (AB-36). Yet, despite arguing for a strict, literal interpretation of "person" in the definition of "victim," they also ask the Court to add words to Section 16(b)(5) to hide their names. This Court should not credit such contradictory arguments. And it cannot add words to the provision. *See Israel v. DeSantis*, 269 So. 3d 491, 496 (Fla. 2019) ("[I]n construing a constitutional provision, we are not at liberty to add words that were not placed there originally….") (quoting *Pleus v. Crist*, 14 So. 3d 941, 945 (Fla. 2009)).

As noted in the News Media Coalition's opening briefing, when those drafting laws intend to prevent the disclosure of identities, they do so with clear intention. (IB-38-39). *See, e.g.*, Fla. Stat. § 119.071(2)(h) (exempting "[a]ny information that reveals the *identity* of the victim of the crime of" child abuse, human trafficking, and sexual offenses); Fla. Stat. § 119.071(2)(j) ("any document that reveals the *identity*, home or employment telephone number, home or employment address, or personal assets of the victim of a crime and identifies that person as the victim of a crime…"); Fla. Stat. § 119.071(4)(b)1. (exempting medical information that "would *identify* that officer"); Ch. 95-207, § 2, Laws of Fla., Crime Victims Protection Act,

("Legislature finds that it is a public necessity that disclosure to the public of victims' *identities* be limited as provided for in this act) (emphasis added).

When identities are not intended to be protected, exemptions read differently. Take for example the various public records exemptions found at Section 119.071(4)(d) of the Florida Statutes. They exempt home addresses, telephone numbers, dates of birth, and sometimes photographs of various government personnel, including law enforcement officers. This type of information would appear to be in line with what Marsy's Law contemplates could be used to locate or harass someone. "Names" are notably absent from the types of information exempted.

In fact, courts have rejected arguments made by law enforcement under the above exemptions that *videos* depicting them should be exempt because *photographs* depicting them are exempt. *See Fraternal Order of Police, Lodge #42, Inc. v. City of Plantation*, No. 16-010620 CACE (09), 2016 WL 11474570 (Fla. Cir. Ct. Aug. 05, 2016), *per curiam aff'd*, 228 So. 3d 569 (Table) (Fla. 4th DCA 2017). In that case, the trial court found:

> A review of other exemptions provided for in Florida's Public Records Act reveals that the Legislature has explicitly exempted both photographs and video. *See*, *e.g.*, § 119.071(2)(h)(c). In the specific exemption at issue, the Legislature only exempted photographs, and did not include video. If the Legislature had intended to exempt video, it would have done so.

See FOP, Lodge #42, Inc., 2016 WL 11474570, at *2.

All told, there is nothing secret about the names of police officers. Respondents' claim that names are a stepping stone for locating or harassing a victim (AB-35) is textually unsupported.

Contrary to Respondents' contention, there is nothing "intensely personal" about a name. (AB-26). As the News Media Coalition argued in its Initial Brief, names ordinarily are not private. (IB-39). *See Post-Newsweek Stations, Fla. Inc. v. Doe*, 612 So. 2d 549, 552 (Fla. 1992). Respondents provide no legal authority to the contrary. Indeed, they display names on their uniforms.

To avoid transparency, Respondents take an all too familiar swipe at the news media's alleged improper motives. (AB-45-46). It should be noted, however, that the motive for seeking public record information is irrelevant in determining whether to disclose. *See Staton v. McMillan*, 597 So. 2d 940, 941 (Fla. 1st DCA 1992), *rev. dismissed sub nom.*, *Staton v. Austin*, 605 So. 2d 1266 (Fla. 1992) (petitioner's reasons for seeking access to public records "are immaterial"); *Lorei v. Smith*, 464 So. 2d 1330, 1332 (Fla. 2d DCA 1985), *rev. denied*, 475 So. 2d 695 (Fla. 1985) (legislative objective underlying the creation of the Public Records Act was to ensure that the people of Florida can freely gain access to governmental records;

the purpose of such inquiry is immaterial). Respondents' swipes at the news media play no role here. The news media's most fundamental job is to gather information about and report on government. Attacking journalists is wrong, particularly when motives do not factor in anyway.

Finally, although information about the fatal encounters themselves have been reported on, contrary to Respondents' assertions (AB-36, 43-44), nothing has been reported about these officers specifically.[5] Without the officers' names, the public has no way of knowing, for example, the Doe Officers' tenure on the police force, any prior employment and circumstances of departure, what training they've had, disciplinary histories, awards, or education. None of this information is available without their names.

The News Media Coalition has repeatedly emphasized that it has made no prejudgments about the Doe Officers. *See* Trial Court ROA at

[5] As they did below, Respondents cite to extra-record materials throughout their brief. This Court should ignore them. *See Tyson v. Aikman*, 31 So. 2d 272, 275 (Fla. 1947) ("it is not the practice to receive new evidence on appeal."); *Hillsborough Cty. Bd. of Cty. Com'rs v. Public Employees Rels. Com'n*, 424 So. 2d 132, 134 (Fla. 1st DCA 1982) (same). Moreover, Respondents cite to certain "articles" supporting Marsy's Law generally to apparently suggest the media are hypocritical. These "articles" were opinion/advocacy pieces written by third parties. *See* AB-2, notes 2-5. Notably, none discuss the unanticipated perversion of Marsy's Law this case presents.

418-19; Appeal Papers at 413; IB-43. It may well be that the Doe Officers are exemplary public servants. But they want to avoid any public debate about their actions that includes any discussion of them. This is not transparency and, as Sheriff Chitwood observes, only serves to fuel community speculation and mistrust of law enforcement. (Chitwood Amicus Brief at p. 9-10).

CONCLUSION

For the foregoing reasons, and for those additionally cited in the News Media Coalition's and City of Tallahassee's respective briefing, this Court should reverse the appellate court and find that Marsy's Law: (1) does not provide anonymity to on-duty law enforcement officers' activity shielding them from public review; and (2) does not shield any "victim" names from public disclosure.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **10th** day of **June**, **2022**, I caused a true and correct copy of the foregoing to be served electronically upon counsel of record by e-mail via the Florida Courts E-Filing Portal to:

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CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that this brief complies with the requirements of Fla. R. of App. P. 9.045(b). It also complies with the word limitation requirements of Fla. R. of App. P. 9.210(a)(2) as it contains 3,896 words.

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