

IN THE SUPREME COURT OF GEORGIA
STATE OF GEORGIA

MIA LASHAY AMMONS)

Appellant,)

v.)

CASE NO: S22A0542

STATE OF GEORGIA)

Appellee)

APPELLEE'S SUPPLEMENTAL BRIEF

Matthew Rollins
Acting District Attorney
State Bar No. 611763

A. Brett Williams
Assistant District Attorney
State Bar No. 760811

District Attorney's Office
Paulding Judicial Circuit
280 Constitution Boulevard, Room 2072
Dallas, Georgia 30132
Phone (770) 443-7561
Fax (770) 443-7538

IN THE SUPREME COURT OF GEORGIA
STATE OF GEORGIA

MIA LASHAY AMMONS)
Appellant)
v.)
STATE OF GEORGIA)
Appellee)

CASE NO: S22A0542

APPELLEE’S SUPPLEMENTAL BRIEF

On February 14, 2022, the Appellee’s brief was filed in the instant case;
page 36 of that brief indicates in pertinent part as follows:

Whether an officer could discern sufficiently the voluntary jerking of a person’s eyes known as nystagmus to be considered a valid clue of impairment purposes has not been developed enough in the lower court record.

In the just-quoted sentence, the Appellee intended to express that the lower court record has not been developed enough to indicate whether, *without performing a horizontal gaze nystagmus evaluation on a person*, an officer could still possibly discern such nystagmus in the person sufficiently enough to be able to consider such nystagmus as a valid clue of impairment.

(The signature page follows.)

Respectfully submitted this 23rd day of February, 2022.

/s/ Matthew Rollins
Matthew Rollins
Acting District Attorney
Paulding Judicial Circuit
State Bar No. 611763

/s/ A. Brett Williams
A. Brett Williams
Assistant District Attorney
Paulding Judicial Circuit
State Bar No. 760811

District Attorney's Office
Paulding Judicial Circuit
280 Constitution Boulevard, Room 2072
Dallas, Georgia 30132
Phone (770) 443-7561
Facsimile (770) 443-7538

IN THE SUPREME COURT OF GEORGIA
STATE OF GEORGIA

MIA LASHAY AMMONS)

Appellant)

v.)

CASE NO: S22A0542

STATE OF GEORGIA)

Appellee)

CERTIFICATE OF SERVICE

This is to certify that the undersigned has served the foregoing **supplemental brief in Georgia Supreme Court case S22A0542** on the Appellant’s attorneys, **Mr. Hunter Rogers, APD, and Mr. Keegan Gary, APD**, at the Paulding Judicial Circuit’s Public Defender’s Office at 280 Constitution Boulevard, Room 1086, Dallas, Georgia 30132. These attorneys and I have agreed to electronic service on our common appellate cases with this Court. I emailed both attorneys their respective copies at their work email addresses: keegan.gary@paulding.gov and hunter.rodgers@paulding.com.

This 23rd day of February, 2022.

/s/ A. Brett Williams

A. Brett Williams

Assistant District Attorney

Paulding Judicial Circuit

State Bar No. 760811