

>> ALL RISE.

HEAR YE, HEAR YE, HEAR YE, THE
SUPREME COURT OF FLORIDA IS NOW
IN SESSION, ALL WHO HAVE CAUSE
TO PLEAD, DRAW NEAR, GIVE
ATTENTION AND YOU SHALL BE
HEARD.

BOOK GOD SAVE THESE UNITED
STATES, THE GREAT STATE OF
FLORIDA AND THIS HONORABLE
COURT.

LADIES AND GENTLEMEN, SUPREME
COURT OF FLORIDA, PLEASE BE
SEATED.

>> GOOD MORNING.

WELCOME TO THE FLORIDA SUPREME
COURT.

WE WILL START WITH CASE NUMBER
21-651, CITY OF TALLAHASSEE
VERSUS PPA.

>> MAY IT PLEASE THE COURT.

WITH THE CITY OF TALLAHASSEE,
LET ME BEGIN WITH THE GENERAL
PRINCIPLE THAT AN ON-DUTY
OFFICER WHO USES FORCE AGAINST A
SUSPECT IS NOT ACTING AS AN
INDIVIDUAL BUT RATHER AS AN
AGENT OF THE GOVERNMENT.
THE OFFICERS HERE WERE ACTING IN
AN OFFICIAL CAPACITY BY THE
AUTHORITY VESTED IN THEM BY THE
CITY OF TALLAHASSEE.

AT NO TIME WERE THEY ACTING ON
THEIR OWN BEHALF AS INDIVIDUALS.
FOR THAT REASON THEY CANNOT BE
REGARDED AS PERSONS THE WAY THE
TERM IS DEFINED IN MARCY'S LAW.

>> WHY?

LET'S SAY I GRANT YOU ACTING IN
HIS OWN CAPACITY.

HAS HE CEASED TO BE A PERSON
EVEN THOUGH HE IS ACTING?

AM I NOT A PERSON AT THE MOMENT
BECAUSE I AM WEARING THIS ROBE?

>> YOU ARE A PERSON AND THEY ARE
PERSONS TOO, BUT THE QUESTION
WHETHER THEY ARE PERSONS IN THE
MEANING OF THIS LAW DEPENDS ON
HOW THE TERM IS CONSTRUED WITHIN
THE MEANING OF THE LAW.

IT COULD MEAN A HUMAN BEING,
THAT IS A WELL ACCEPTED
DEFINITION OF A PERSON AND IF

YOU CHOOSE TO INTERPRET IT TO ME
NOW IN THIS CONTEXT WE LOSE, NO
QUESTION THEY ARE HUMAN BEINGS,
I GET THAT AND UNDERSTAND THAT
BUT A BETTER INTERPRETATION OF
THE TERM PERSON IN THE CONTEXT
OF THIS LAW IS AN INDIVIDUAL,
NOT THEY WERE NOT ACTING AS
INDIVIDUALS BUT AS AGENTS OF THE
GOVERNMENT.

THEY WERE IN FACT THE GOVERNMENT
ON THAT DAY.

WHEN THEY WENT OUT WITH THEIR
WEAPONS, THE POWER TO ARREST
PEOPLE, THE POWER TO DETAIN
PEOPLE, TO USE DEADLY FORCE
AGAINST PEOPLE IF NECESSARY THEY
WERE NOT ACTING AS PERSONS IN
THE WAY THAT WORD IS DEFINED
HERE.

>> MY LARGER QUESTION, I WONDER
WHY YOU PUT SO MANY EGGS IN THIS
BASKET?

ISN'T YOUR STRONGER ARGUMENT THE
FACT THAT WHILE THIS PERSON IS A
PERSON, PERHAPS THE FACT THAT HE
HAS HIS NAME ON HIS LAPEL TELLS
US SOMETHING.

CAN I HEAR FROM YOU ON THAT?
LET'S SAY WE DON'T AGREE WE WILL
MAKE THIS DISTINCTION BETWEEN
ACTING AS A PERSON AND BEING A
PERSON AND CONCLUDE THAT A
PERSON IS A PERSON.

MAKE THE ARGUMENT ABOUT WAIVER.

>> I'M NOT FOLLOWING YOUR
QUESTION.

>> IF I AM A PERSON AND I
DISCLOSED MY IDENTITY, HAVEN'T I
WAVED MY RIGHTS?

>> THAT'S A GOOD POINT.

I DON'T THINK IT IS A POINT
ANYBODY MADE IN THIS CASE BUT I
THINK I WOULD SAY THAT'S
CORRECT.

AND SOME SET RESPECTS THE
IDENTITY POINT, THAT GOES TO THE
IDENTITY POINT.

POLICE OFFICERS WALK AROUND WITH
THEIR NAMES ON THEIR CHESTS.

IT IS HARD UNLESS IT HAPPENS TO
HAPPEN WHERE NOBODY IS WATCHING
AND THERE ARE CASES WHERE YOU
VIDEOTAPE THESE THINGS.

>> DID WE NOT CLASSIFY POLICE OFFICERS AS PERSONS IN THE STAND YOUR GROUND OCCUPATIONS?

>> YOU DID BUT THERE'S A DIFFERENT, THERE IS A VERY STRONG DIFFERENCE THERE. THERE, OUR WHOLE ARGUMENT IS BASED ON THE FACT THAT THERE'S A DIFFERENCE BETWEEN THE DEFINITION OF A PERSON AS A HUMAN BEING OR INDIVIDUAL? THE COURT HAS TO PICK THE ONE THAT FITS THE CONTEXT OF THIS LAW BEST.

IN THE CONTEXT OF THE STAND YOUR GROUND LAW, HUMAN BEING WORKS FINE BECAUSE THEY WERE NOT ACTING AS AN INDIVIDUAL, HE WAS DEFENDING HIMSELF AGAINST A CHARGE MADE BY THE GOVERNMENT. ONE OF THE MOST INDIVIDUAL THINGS YOU COULD THINK A PERSON COULD DO.

>> TO THE SAME EXTENT, THE OFFICERS WERE PURPORTING TO ACT IN SELF-DEFENSE.

ISN'T THAT CORRECT?

THE FACTUAL CONTEXT HERE, I AM STRUGGLING TO SEE HOW THIS IS SO DRAMATICALLY DIFFERENT. GIVEN THAT UNDERLYING COMMONALITY.

>> IN ANSWER TO YOUR QUESTION THERE ARE SIMILARITIES BUT THERE'S A HUGE DIFFERENCE BETWEEN DEFENDING YOURSELF AGAINST AN ACTION TAKEN BY THE GOVERNMENT AND USING THE AUTHORITY YOU HAVE AS A POLICE OFFICER TO DO SOMETHING, THESE OFFICERS, THEY WERE THE -- INITIATED THE ACTION.

LET ME MAKE ANOTHER POINT ABOUT THAT THAT IS IMPORTANT.

IN OUR WHOLE CASE HERE IS ABOUT CONTEXT.

IF THERE'S NOTHING IN THE STAND YOUR GROUND LAW THAT WOULD PREVENT THE COURT SAYING WE ARE GOING TO TREAT THIS PERSON AS A HUMAN BEING AND NOT AS AN INDIVIDUAL WHEREAS IN MARCY'S LAW, YOU WOULD HAVE TO CONTRAVENE A LOT OF THINGS IN

MARCY'S LAW TO USE THE HUMAN BEING DEFINITION. HE WOULD HAVE TO GO AGAINST THE PURPOSE, YOU WOULD HAVE TO MAKE ALMOST EVERY ONE OF THE PROVISIONS IN MARCY'S LAW MEANINGLESS AND YOU WOULD END UP WITH A DECISION, AN OPINION THAT COULD BE READ TO SAY ESSENTIALLY THAT MARCY'S LAW WAS ENACTED FOR THE PURPOSE OF PROTECTING THE POLICE.

IT WAS NOT.

>> IS THE POSITION, THE CONSEQUENCE OF YOUR POSITION THAT THE WIDOW OR WIDOWER OF AN OFFICER KILLED IN THE LINE OF DUTY BUT NOT GET THE BENEFITS OF NEXT OF KIN?

ALL THE PANOPLY OF VICTIMS RIGHTS TO BE PRESENT, TO BE HEARD ETC. ETC.

IS THERE ANY WAY TO TREAT THAT DIFFERENTLY THAN WHAT YOU ARE ARGUING?

>> I DON'T THINK THAT MAKES ANY SENSE IN THE CONTEXT OF A POLICE OFFICER.

IF YOU LOOK AT THE PANOPLY --

>> SO THE WIDOW OF AN OFFICER IS DIFFERENT FROM THE WIDOW OF NON-POLICE OFFICER VICTIM?

>> NO.

THERE ARE SOME RIGHTS THAT COULD BE EXERCISED HERE.

>> ONLY BECAUSE THAT PERSON WOULD FIT THE DEFINITION OF A VICTIM.

I DON'T SEE HOW YOU COULD INCLUDE THEM AND EXCLUDE THE OFFICER.

>> BECAUSE THE TEXT OF MARCY'S LAW SIMPLY DOESN'T SUPPORT THAT.

IF YOU LOOK AT A 3 IT GIVES THE VICTIM THE RIGHT IN THE JUDICIAL PROCESS TO BE REASONABLY PROTECTED FROM THE ACCUSED. THE POLICE OFFICERS ARE THE ONES WHO PROTECT US FROM THE ACCUSED. IT DOESN'T MAKE SENSE.

THE NEXT SENTENCE, NOTHING CONTAINED HERE IS INTENDED TO PREVENT A SPECIAL RELATIONSHIP

BETWEEN THE CRIME VICTIM AND ANY
LAW ENFORCEMENT AGENCY.

MARCY'S LAW, THE TEXT OF MARCY'S
LAW IS SETTING UP A DISTINCTION
BETWEEN LAW ENFORCEMENT AND
VICTIMS.

I DON'T KNOW HOW YOU COULD BE
BOTH AND READ THAT SENTENCE
FAIRLY.

>> COULD YOU ADDRESS WHY YOU
THINK YOU SHOULD WIN ON YOUR
THIRD ARGUMENT?

THIS WAS TOUCHED ON BRIEFLY BY
AN ASPECT RELATED TO IT THAT
WASN'T RAISED ABOUT WHY DO YOU
THINK YOU SHOULD WIN UNDER YOUR
THIRD ARGUMENT?

>> MARCY'S LAW, WE BEGIN WITH
THE PROPOSITION THAT THERE IS
NOTHING THAT EXPLICITLY SAYS A
VICTIM CAN REMAIN ANONYMOUS.
I THINK YOU HAVE TO CONSIDER
THAT AGAINST THE BACKDROP OF
EXISTING LAW.

THE PUBLIC RECORDS LAW, CHAPTER
112 PROVIDES POLICE OFFICERS,
ADDRESSES AND PHONE NUMBERS AND
OTHER IDENTIFYING INFORMATION IS
CONFIDENTIAL, NOT PUBLIC BUT
THEIR NAMES ARE PUBLIC.

AGAINST THAT BACKDROP WE HAVE
MARCY'S LAW.

SO MANY INSTANCES IN THE LAW THE
FIRST DISTRICT WAS KIND ENOUGH,
A NUMBER OF THEM, SPECIFIC
STATEMENTS THAT ARE VICTIMS FOR
PERSON'S IDENTITY TO BE
PROTECTED.

JUVENILE COURT PROCEEDINGS, WE
HAVE A RULE THAT SAYS YOU DON'T
GIVE THE NAME OF A JUVENILE
OFFENDER.

THE QUESTION IS HOW HARD IT
WOULD HAVE BEEN TO DO THAT IF
THAT WAS WHAT WAS INTENDED.

>> ISN'T THERE A DIFFERENCE
BETWEEN STATUTES THAT LIST
THINGS THAT ARE EXEMPT LIKE
NAME, ADDRESS, SOCIAL SECURITY
VERSUS THIS TEXT WHICH INSTEAD
OF LISTING SPECIFIC THINGS
DESCRIBES THE CATEGORY OF
THINGS, IF WE JUST DON'T AGREE
WITH YOUR BACKGROUND LAW, JUST

LOOK AT THE CATEGORY OF THINGS
THAT COULD BE USED TO LOCATE
SOMEONE WITH THE NAME FIT WITHIN
THAT?

>> I THINK A NAME COULD BE USED
AS A WAY OF LOCATING THAT.

>> WOULDN'T BE PLAUSIBLE TO
EXCLUDE A NAME FROM THAT
CATEGORY?

>> NOW WE ARE GETTING INTO AN
INTERPRETIVE ARGUMENT THE
RESPONDENTS WANT TO AVOID ON THE
FIRST POINT.

AS A STRICT CONSTRUCTIONIST OR
TEXTUAL LIST.

WHAT I'M SAYING IS MY ARGUMENT
ON THE THIRD POINT, BETWEEN
THOSE ARGUMENTS ON BOTH SIDES.

>> WHAT ABOUT THE STRICT
CONSTRUCTIONIST?

>> THE STRICT CONSTRUCTIONIST
WOULD BE OKAY WITH THE TERM, THE
PERSON MEANING ANYBODY WHO
HAPPENS TO BE HUMAN BECAUSE
AFTER ALL IT SAYS THAT AND WE
DON'T NEED TO LOOK AT THE
CONTEXT, TEXTUAL LIST WOULD LOOK
AT THE CONTEXT BUT BY THE SAME
TOKEN A STRICT CONSTRUCTIONIST
DOESN'T SAY ANYTHING ABOUT
ANONYMITY.

>> ESPECIALLY ONE, IF WE
INTERPRET CONSTITUTIONAL
PROVISIONS, THE SAME TYPES OF
LEGAL CONVENTIONS THAT WOULD
APPLY TO A STATUTE.

>> GENERALLY I DO.

IF THE COURT DOESN'T MIND I
WOULD LIKE TO TALK ABOUT THE
SECOND POINT, THE NEED FOR
NEUTRAL DETERMINATION OF VICTIM
AND AT THIS POINT IT COULD END
UP AND DISASTER.

IF WE DON'T GET IT RIGHT, IF YOU
DON'T HAVE NEUTRAL DETERMINATION
OF THE VICTIM AND WHO IS THE
DEFENDANT YOU HAVE A SITUATION
WHERE PEOPLE ARE OUT IN THE
STREET, YOU HAVE AN ASSAULT
CASE, ONE PERSON SAYS HE
ASSAULTED ME OF THE OTHER PERSON
SAYS NO, HE WAS THE AGGRESSOR, I
WAS JUST DEFENDING MYSELF.
DO THEY BOTH GET THE CLAIM THAT

THEY WERE VICTIMS?
FOR ABOUT THE TEXT OF THIS
THROUGHOUT THE WHOLE THING THERE
IS THIS THREAD THAT THERE HAS TO
BE A PROCEEDING.

IT STARTS AT THE BEGINNING TO
ACHIEVE JUSTICE AND ENSURE
MEANING FOR JUVENILE JUSTICE
SYSTEMS.

AND ENSURE CRIME VICTIMS RIGHTS
ARE LESS VIGOROUS THAN THOSE OF
THE DEFENDANT OR DEFENDANT'S
RIGHTS HAVE TO DO THE
PROCEEDING.

THE ENFORCEMENT MECHANISM FOR
MARCY'S LAW IN THE SUBSECTION,
MAY ASSERT OR SEEK ENFORCEMENT
RIGHTS IN ANY TRIAL OR APPELLATE
RIGHT WITH JURISDICTION OVER THE
CASE.

THERE HAS TO BE A PROCEEDING IN
WHICH YOU CAN CLAIM SOMEBODY
SAID YOU ARE THE VICTIM,
SOMEBODY ELSE IS THE DEFENDANT.

>> WHAT DO WE MAKE OF THE
STATEMENT, THE EXPRESS PROVISION
OF THEM.

WHAT DO WE MAKE OF THE EXPRESS
PROVISION THE RIGHT ATTACHES AT
THE TIME?

>> THAT'S NOT DETERMINATIVE
BECAUSE THERE'S A DIFFERENCE
BETWEEN THE TIME WHEN A RIGHT
ACCRUES AND THE TIME THERE ARE
LOTS OF RIGHTS --

>> THE RIGHT HAS ACCRUED?

>> ASSUMING SOMEBODY
SUBSEQUENTLY DETERMINED THAT
PERSON IS A VICTIM.

I WOULD ALSO POINT OUT THE RULES
UNDER MARCY'S LAW, ASSUMES THE
EXISTENCE OF PROCEEDING.

THIS ISN'T GOING TO BE SOMETHING
THAT IS LITIGATED IN THE
STREETS.

IT IS GOING TO BE SOMETHING THAT
IS IRONED OUT IN COURT.

>> RULES DEAL WITH PROCEEDINGS.
THAT IS INHERENT IN WHAT WE ARE
DEALING WITH IN THE PROCEEDINGS.

>> I UNDERSTAND THAT.

IT IS CONSISTENT WITH OTHER
PROVISIONS IN MARCY'S LAW WITH
THE NEED FOR PROCEEDING.

I DON'T THINK WE CAN HAVE A SITUATION WHERE PEOPLE CAN SELF DECLARE AS VICTIMS.

THERE ARE A LOT OF TIMES THERE MIGHT BE A CRIMINAL ACT AND NOT YET SHOWN THERE IS INTENSE.

MAYBE THE CRIME ISN'T RIPE ENOUGH TO BE KNOWN AS A CRIME.

HOW DO WE KNOW WHO THE VICTIM IS AT THIS POINT?

IT MAY BE A CIVIL CASE.

>> LET'S FOCUS ON THE FACT OF THIS CASE.

IS A CITY'S POSITION THE OFFICERS WERE NOT VICTIMS AT THE TIME THEY WERE ASSAULTED?

>> I THINK THEY WERE NOT VICTIMS BECAUSE THEY WERE NOT PERSONS BY ANY FAIR READING OF MARCY'S LAW.

IF I TAKE THE ASSUMPTION OF YOUR QUESTION WE DO CONCEDE THEY ACTED PROPERLY AND THAT THEY WERE THREATENED.

IF THAT HELPS IN YOUR DETERMINATION, I AM DOWN TO 10 SECONDS AWAY FROM MY COCOUNSEL'S TIME.

>> MAY IT PLEASE THE COURT.

FOR THE NEWS MEDIA, I WANT TO FOLLOW UP ON TWO POINTS.

WHETHER IDENTITIES ARE PROTECTED UNDER MARCY'S LAW AND TWO POINTS TO MAKE HERE IN THE CONSTITUTION WHEN IDENTITIES ARE PROTECTED AND HELD CONFIDENTIAL THE ONE CONSTITUTIONAL PROVISION WAS CLEAR ABOUT THAT.

WITH MARIJUANA PATIENTS, IT DOESN'T EXPLICITLY, AS MY COLLEAGUE MENTIONED CONTEXT, MATTERS IN THIS CASE.

IN THE CRIMINAL PROCESS, THE IDENTITY OF A VICTIM NEVER COMES OUT DURING THE PROCESS AS IT FLOWS THROUGH BECAUSE THE DEFENDANT HAS A RIGHT TO CONFRONT THEIR ACCUSERS SO IT MAKES SENSE THAT IDENTITY --

>> THAT IS TRUE.

IF THE PERPETRATOR, OF THE CRIME IS DECEASED.

THAT GOES THROUGH IN THOSE CIRCUMSTANCES.

>> PART OF THE IRONY IN THIS

CASE IS WE HAVE A SITUATION WHERE YOUR ALLEGED VICTIMIZER IS DECEASED AND PRESENTS NO THREAT TO YOU AND SO MUCH OF WHAT MARCY'S LAW IS DESIGNED TO PROTECT SIMPLY FALLS AWAY AND IT RESULTS IN THIS CASE WHERE WE TAKE OFFENSE OF ACTION AND KILL YOUR ALLEGED VICTIMIZER IT RESULTS IN PERPETUAL ANONYMITY AND THAT IN OUR VIEW WOULD TURN MARCY'S LAW IN THE POLICY REASONS BAKED INTO THE LAW AS TO WHY IT IS THERE ON ITS HEAD, THOSE ARE THE ABSURD RESULTS WE THINK THIS COURT TO RULE IN A MATTER THAT AVOIDS THAT SO THAT SORT OF ABSURDITY IS SOMETHING MARCY'S LAW DOES NOT CONTEMPLATE AND ALL THE PROTECTIONS DON'T APPLY.

THE OTHER POINT I WANT TO MAKE IN MY BRIEF TIME IS A POINT THE DCA MADE THAT THERE IS NO CONFLICT BETWEEN MARCY'S LAW, SECTION 16, ARTICLE 1 SECTION 16 AND SECTION 24.

GIVEN THE READING THE FIRST DCA GAVE SECTION 16 WE BELIEVE THERE IS A CONFLICT THAT NEEDS TO BE RESOLVED, THE ARTICLE 16 BE 5 DOES NOT CREATE AN EXPLICIT EXEMPTION TO THE RIGHT OF ACCESS.

WHEN THAT IS SO, ARTICLE 1 SECTION 24 SAYS THAT A CONFIDENTIALITY CARVEOUT NEEDS TO BE SPECIFICALLY CREATED IN HERE WE SIMPLY DON'T HAVE THAT. THAT MAKES IT CLEAR.

WE DON'T KNOW WHO THE VICTIM IS. WHEN THEY FADE AWAY DURING A CRIMINAL PROCEEDING, WHETHER THEY HAVE BEEN WAIVED, WHETHER SOMEBODY WANTS TO ACCEPT, OR ASSERT THOSE RIGHTS.

THERE ARE ALL THESE VARIABLES, THE SCOPE OF WHAT IS PROTECTED WHEN A VICTIM, IF THERE IS A TRUE VICTIM.

ALL THESE THINGS NEED TO BE CONSIDERED.

IT RESULTS IN A PROVISION THAT IN CERTAIN CIRCUMSTANCES

RESTRICT ACCESS TO PUBLIC INFORMATION BUT IS NOT A 1-SIZE-FITS-ALL MONOLITHIC EXEMPTION.

BECAUSE OF THAT, THERE'S A CONFLICT WHERE THIS COURT NEEDS TO CONSIDER WHETHER THE POLICY PROVISIONS OF ARTICLE 1 SECTION 24 AND MARCY'S LAW, COME DOWN WITH A RULING THAT GIVES EFFECT TO BOTH AND OUR POSITION HERE IS ANY RULING THAT CUTS TO THE CORE OF THE TRUE PUBLIC ACCOUNTABILITY TYPE OF INFORMATION THAT IS AT ISSUE, WE CITED A WEALTH OF CASE LAW THAT RECOGNIZES THE IMPORTANCE OF HOLDING GOVERNMENT AND POLICE ACTION ACCOUNTABLE NEEDS TO BE BALANCED AGAINST THE MARCY'S LAW PROVISIONS WHICH AS MY COLLEAGUE SAID ARE DESIGNED TO PROVIDE RIGHTS DURING THE COURSE OF A CRIMINAL PROCEEDING AND BALANCING THOSE RIGHTS COMES DOWN TO RECOGNIZING THAT POLICE OFFICERS IN THE SCOPE OF OFFICIAL DUTIES DO NOT HAVE VICTIM STATUS UNDER MARCY'S LAW. MY TIME IS UP.

THANK YOU.

>> MAY IT PLEASE THE COURT.

MY NAME IS LUKE NEWMAN AND I REPRESENT THE RESPONDENTS. MY INDIVIDUAL CLIENTS ARE PEOPLE.

THEY ARE POLICE OFFICERS. AND TWO SEPARATE INCIDENTS, BOTH MEN WERE ATTACKED ESSENTIALLY UNPROVOKED WITH HOMICIDAL VIOLENCE.

BOTH OF MY CLIENTS RESPOND WITH FORCE.

THEY BOTH SHOT, THEY BOTH KILLED THEIR ATTACKERS.

EACH AND AFFIRMATIVELY OPTED INTO THE PROTECTIONS OF MARCY'S LAW.

MY COLLEAGUES ON THE OTHER SIDE SAY THEY ARE NOT PEOPLE, THAT TERM IS USED MARCY'S LAW, AND THEY DON'T GET THE PROTECTIONS THE LAW AFFORDS.

THE REASON THEY SAY THIS IS THE

TERM PERSON DOES NOT INCLUDE A POLICE OFFICER AND WAS TOUCHED ON EARLIER, MAY NOT BE THAT SPECIFIC ON MIGHT NOT INCLUDE ANY PUBLIC OFFICIAL WORKING IN THE COURSE OF HIS OR HER DUTIES. MY CLIENTS HAVE SUGGESTED A NONSPECIFIC CARVEOUT IN THE LANGUAGE OF THE FLORIDA CONSTITUTION.

THEY ACCUSED MY SIDE, MY COLLEAGUES, OF IGNORING THE CONTEXT OF THE LANGUAGE BUT THE LANGUAGE SAYS THAT IT SHOULD APPLY TO EVERY VICTIM.

A VICTIM IS DEFINED AS A PERSON WHICH WE DISCUSSED AND THERE IS THIS LONG MOUTHFUL OF A PERSON THREATENED WITH PHYSICAL HARM OR POTENTIAL HARM AND THEN EASIER TO HANDLE VICTIMIZATION DEFINITION, AGAINST WHOM THE CRIME IS COMMITTED.

NO CARVEOUT SUGGESTED BY MY COLLEAGUES EXISTS IN THE LANGUAGE.

THIS IS A REQUEST FOR AFTER-THE-FACT AD HOC EXCEPTION, THAT LAWMAKERS AND ENACTED DESIRES IN A MATTER THAT IS NOT COVERED.

>> I THINK THE TWO ISSUES MOST IMPORTANT ARE TRIGGERING EVENT ISSUE AND THE ANONYMITY ISSUE. FOCUS ON THE TRIGGERING ISSUE.

>> I WILL --

>> INCLUDE SOMETHING SPECIFIC ANYTIME.

THE STRONGEST POINT ON YOUR SIDE IS THE RIGHTS ATTACHING THE POINT OF VICTIMIZATION BUT THE OTHER SIDE HAS POINTS ABOUT THE FACT THE OVERALL CONTEXT OF THIS PROVISION IMPLIES THERE'S GOING TO BE A CRIMINAL PROCEEDING, SPECIFICALLY IN SUBSECTION D IT SAYS THE PROVISIONS OF THIS SECTION APPLY THROUGHOUT CRIMINAL AND JUVENILE JUSTICE PROCESSES.

COULD YOU HELP US UNDERSTAND HOW THIS TRIGGERING EVENT ISSUE AND HOW SOMEONE FOR THE PURPOSES OF THIS CAN BECOME DESIGNATED?

>> LET ME START WITH THE LAST PART, THE LANGUAGE SAYS IT BEGINS AT THE TIME OF THIS, A TRIGGERING EVENT LATER ON. HE NEEDS TO BE NEUTRAL DETERMINATION.

IT GIVES A FAIR READING, AT THE TIME OF VICTIMIZATION, THERE'S A LATER POINT IN TIME.

>> I UNDERSTAND THE PROBLEM, TO MAKE SENSE OF THIS THING IN ITS ENTIRETY.

THERE WERE ASPECTS THAT WERE UNORTHODOX, AND THINGS YOU SEE IN LEGAL DOCUMENT.

A LOT OF THIS DOES ASSUME, BETWEEN DEFENDANTS AND THE NATURE OF MOST OF THE RIGHTS INVOLVED HERE.

IT IS IN THE CONTEXT IN THE CRIMINAL PROCEEDING.

AND MAKE SENSE OF ALL THAT.

DO YOU AGREE, SOMETHING HAS BEEN DONE TO THEM, THE CONCEPT OF CRIME, THE CONCEPT OF A CRIME IMPLIES THE DETERMINATION BY GOVERNMENT AUTHORITY.

THEY DECLARE THEMSELVES, QUOTE, CRIME VICTIMS?

>> THERE HAS TO BE FREEDOM.

>> THERE IS A DISPUTE ABOUT THE BODY'S CRIME VICTIM STATUS, THE TEXT AND MARCY'S LAW ALLOWS THE INDIVIDUAL GO TO ANY COURT, TRIAL OR APPELLATE AND PURSUE THE RIGHTS.

WHERE IT IS DISPUTED, I DON'T THINK SOMEBODY SHOULD WALK IN THE DRIVEWAY AND SAY I AM A CRIME VICTIM.

THERE'S A DISPUTE ABOUT STATUS AS A CRIME VICTIM ALLOWING THE INDIVIDUAL TO GOING TO COURT, I WANT TO BACKUP.

IF WE ARE GOING TO READ A LATER TRIGGERING ATTEMPT.

THAT WILL CREATE ABSURD RESULTS.

IT WILL NOT PROTECT ANY VICTIM,

MY INDIVIDUAL CLIENT IN THIS

CASE, THE OFFENSES WERE

COMMITTED BY A DEFENDER WHO DIES IN HIS OR HER APPREHENSION.

YOU CREATE THIS ARBITRARY

INDEXING OF VICTIM, WHEN YOU GET

THESE RIGHTS NOW BECAUSE THE PERSON WHO VICTIMIZED YOU IS ALIVE AND IDENTIFIED OR ARRESTED, WHATEVER THE TRIGGERING EVENT SUGGESTED IS NOT SPECIFIC AND SOMEBODY ELSE VICTIMIZED BY SOMEONE WHO COMMITS SUICIDE CONTEMPORANEOUSLY WITH THE OFFENSE, THERE IS NOT A TRIGGERING, AT THE TIME OF VICTIMIZATION, WE DON'T HAVE A TRIGGERING EVENT NECESSARY LATER.

THAT'S A 2-PRONGED RESPONSE TO THAT ARGUMENT BY MY COLLEAGUES BUT GOING BACK, WE'VE BEEN THROUGHOUT THE TENDENCY OF THIS CASE ACCUSED OF NOT KEEPING IT IN CONTEXT.

IT GOES BACK AND CONTRADICTS WHAT IT SAYS WHICH APPLIES TO EVERY VICTIM.

DOES THAT HANDLE THAT FAIRLY? AND YOU BROUGHT UP ANOTHER ISSUE.

>> IT IS OBVIOUSLY -- THE ANONYMITY ISSUE, TO THE EXTENT THIS ISSUE ARISES WHERE SOMETHING AFFECTS ALL VICTIMS.

>> WHAT WE RELIED ON IS THE CONTROVERSY THAT THE BROAD NET THAT THE LANGUAGE FLOWS COVERS ANONYMITY.

WHAT THE LANGUAGE TELLS US, WITH INFORMATION, RECORDS THAT COULD BE USED TO LOCATE OR HARASS WHICH COULD DISCLOSE CONFIDENTIAL OR PRIVILEGED INFORMATION.

THROUGHOUT, WE ARGUED THAT THE TERM COULD INTRODUCES THE NOTION OF POSSIBILITY.

AND THE LANGUAGE IS SO BROAD THAT IT -- ITS PRESUMED POINT AS GENERAL AND BROAD IS TO PROVIDE GENERAL COVERAGE.

>> BUT DOESN'T READ OUT OF THE CONFRONTATION CLAUSE.

>> THERE'S A CONFRONTATION CLAUSE.

>> TO CONFRONT MY ACCUSER I HAVE TO --

>> IF YOU ARE A CRIMINAL

DEFENDANT YOU HAVE A
CONFRONTATION.

>> IF WE UNDERSTAND THE
CONFRONTATION CLAUSE IS A
MEANINGFUL CHECK ON THIS
LANGUAGE IN MARCY'S LAW, DOESN'T
THAT PRECLUDE THE ARGUMENT THAT
THE VICTIM'S IDENTITY CAN
FOREVER BE SEALED AWAY?

DOESN'T THE CONFRONTATION CLAUSE
ACT AS A SAFEGUARD AGAINST THE
BOTTOMLESS PIT OF ANONYMITY YOU
SEEM TO BE ARGUING FOR?

>> IN A CRIMINAL TRIAL?

ABSOLUTELY.

I DON'T THINK YOU CAN HAVE AN
ANONYMOUS VICTIM IN A CRIMINAL
TRIAL.

I DON'T CONCEDE -- WE ARE NOT
HERE ON A CRIMINAL PROCEDURE
ISSUE BUT I DON'T CONCEDE THAT
DOESN'T MEAN THE JUDGE MIGHT
CLOSE OF COURT ROOM, I DON'T
CONCEDE THAT MEANS IF I'M
ACCUSED OF COMMITTING A CHILD
SEX CRIME IT DOESN'T MEAN MY
FRIEND SIT IN THE COURTROOM
DURING THE TRIAL EVEN THOUGH I
HAVE A RIGHT TO CONFRONT
WITNESSES AND TO HAVE A PUBLIC
TRIAL.

>> NOT SURE HOW MUCH THAT
PATTERN HELPS YOU BECAUSE OFTEN
THE REASON FOR ANONYMITY IN
THOSE CASES IS MORE TO PROTECT
THE VICTIM AND THE ACCUSED.
AND YOU HAVE THE SAME FACT
PATTERN.

>> WE ARE OFF THE FACT PATTERN
BUT I WANT TO MAKE SURE I AGREE
WITH THAT THAT THE CONFRONTATION
STILL EXISTS DESPITE WHAT IS IN
MARCY'S LAW AND IF WE GET INTO A
CRIMINAL TRIAL, NOT CONCEDED
ANYTHING IN THAT.

>> WHAT I WAS DISCUSSING, WHAT
ABOUT THE FACT THAT A POLICE
OFFICER GENERALLY SPEAKING AS
PART OF HIS OR HER MISSION IS
IDENTIFIED PUBLICLY, IN THE LINE
OF DUTY IDENTIFIES HIM OR
HERSELF TO BE AN EFFECTIVE LAW
ENFORCEMENT OFFICER WANTS TO BE
KNOWN IN THE COMMUNITY WHERE HE

OR SHE IS POLICING TO GENERATE
INFORMANTS, WEEDS, BEING
ANONYMOUS SEEMS ANATHEMA, IN A
FREE DEMOCRATIC REPUBLIC.
HELP ME UNDERSTAND HOW BEING A
POLICE OFFICER DOESN'T WAIVE
THIS CLAIM OF FULL ANONYMITY AT
THE EDGE OF YOUR ARGUMENTS.

>> WITH A FEW STROKES, THE
WAIVER ARGUMENT, WOULD BE THE
SAME ARGUMENTS WE'VE SEEN THAT
YOU WAIVED YOUR RIGHTS IN STAND
YOUR GROUND LAW, WHEN YOU PUT
THE UNIFORM ON AND THE
NAMEPLATE.

>> THE DIFFERENCE IS BY PUTTING
MY NAMEPLATE ON IT I AM
LITERALLY TELLING YOU MY NAME
WHICH IS DIFFERENT FROM SAYING
I'M NOT GOING TO DEFEND MYSELF.
YOU UP PUTTING ASIDE ARM ON.
I DON'T THINK YOU ARE WAIVING
YOUR RIGHT TO DEFEND YOURSELF.
IT'S MORE THAT, IT SAYS SMITH ON
OFFICER SMITH'S LAPEL.

>> LET ME TAKE YOU TO THE TIMING
ISSUE WE WERE DISCUSSING EARLIER
THAT WE TALKED ABOUT RIGHTS
BEING CREATED AT THE TIME AND
PUT THE NAMEPLATE ON.
YOU BECAME A CRIME VICTIM LATER.
DOES IT MAKE SENSE?

I WANT TO MAKE SURE YOU PUT THE
NAMEPLATE ON AND YOU GET OUT
THERE AND YOU HAVEN'T BEEN
VICTIMIZED AT THAT POINT, THE
VICTIMIZATION HAPPENED LATER ON.
I WANT TO SAY ONE OTHER THING.
THERE HAS BEEN THIS UNDERCURRENT
IN THIS CASE THROUGHOUT THE
FINDING FOR MY CLIENTS,
AUTHORIZING THIS SECRET POLICE
FORCE, THERE'S NEVER BEEN ANY
CONFUSION, THAT WAS A
TALLAHASSEE POLICE DEPARTMENT
OFFICER THE TOOK THE ACTS.
WE ARE NOT ADVOCATING A SECRET
POLICE FORCE.
THAT'S AN UNFAIR
CHARACTERIZATION.

>> ON THE FACE OF THE
CONSTITUTION, PROTECTING AGAINST
THIS HARASSMENT, NOT
NECESSARILY, IMMUNIZATION FROM

INVESTIGATION CHARGE, THIS PIVOTS TO ANOTHER PIECE OF THE ARGUMENT WHICH CAN BE USED TO LOCATE, OBVIOUSLY IF YOU PUSH THAT TO ITS LOGICAL EXTREME, A PHYSICAL DESCRIPTION COULD BE USED TO LOCATE THE OFFICER, I DON'T KNOW HOW MANY OFFICERS ARE OVER 6 FOOT 7 IN TALLAHASSEE BUT SAY TWO ARE AND YOU SAID I'M NOT DISCLOSING THE NAME OF THE OFFICER BUT I WILL SAY HE OR SHE WAS 6 FOOT 7.

CAN THAT BE USED TO LOCATE AND HARASS THE OFFICER AND NEEDS TO BE SUPPRESSED?

>> THE WAY WE ARGUED THIS, THE TERMS COULD BEING PLACED INTO THE LANGUAGE AND THE WAY WE ARGUED THIS, I HOPE THIS ANSWERS YOUR QUESTION THAT UNLESS IT COULD NOT, I GUESS YOUR QUESTION ABOUT THE UNIQUE HEIGHT OF AN INDIVIDUAL, THE WAY WE ARGUED THIS, UNLESS IT WAS SHOWN THAT IT COULD NOT BE LOCATED THROUGH THAT IF THERE WAS A SITUATION YOU COULD NOT, WE WANT TO KNOW THE NAMES AND INFORMATION AND HISTORY OF AN OFFICER OVER 6'7 QUOTE IN HEIGHT AND YOUR CLIENT DOESN'T FALL INTO THAT I DON'T THINK YOU WOULD HAVE MARCY'S LAW.

>> YOU DON'T GET ANYWHERE NEAR THE LOGICAL EXTREME TO NAME SOMETHING THAT COULD BE USED TO LOCATE SOMEONE.

>> THAT HAS BEEN OUR POSITION THROUGHOUT.

I WILL LET THE DISTRICT COURT DO THE TALKING, THE FIRST INGREDIENT OF ANY SUCH PURSUIT. I DON'T GRASP THE ARGUMENT, WHEN WE LOOK AT LANGUAGE THAT WE ARE DEALING WITH, SAYING THAT IT DOESN'T APPLY --

>> I THINK THE POINT WOULD BE DO WE NEED TO TAKE COMMON SENSE INTO ACCOUNT AND ACKNOWLEDGE IN THE COURSE OF CRIMINAL PROCEEDINGS, YOU ARE ALMOST ALWAYS ABSENT SOME UNIQUE SUBCATEGORY, YOU ARE MOST ALWAYS

GOING TO KNOW THE IDENTITY.
JUST THAT MERE FACT, THE
IDENTITY --

>> MCEVOY -- TALKING ABOUT,
PROSECUTION.

>> CLEARLY THAT IS THE CORE EVEN
IF THERE ARE SOME CASES WHERE
THERE WILL BE A CLEAR VICTIM AND
YET THERE IS NO PROCESS AND YOU
ACKNOWLEDGE THAT THE COURT --
THE CRIMINAL PROCESS, THE WHOLE
SPIRIT AND FOR REST IS TO HAVE A
SYMMETRY.

DEFENDANTS EMPLOYER PROCESS.

>> OUR POSITION, DISTRICT COURT
OPINION, NOTHING IN THIS
LANGUAGE REQUIRES THIS.

AN INDIVIDUAL VICTIMIZED --
THERE'S NO CRIMINAL PROCESS, YOU
ARE CARVED OUT OF EVERY -- WE
ARE NOT GOING TO PROVIDE THESE
PROTECTIONS BECAUSE THE PERSON
WHO VICTIMIZED YOU HAPPENED TO
BE KILLED BEFORE HE COULD BE
APPREHENDED.

I DON'T KNOW HOW YOU CAN DO THAT
AND SAY THESE RIGHTS APPLY.

YOU PEOPLE HAD THE MISFORTUNE OF
BEING VICTIMIZED BY SOMEONE WHO
COMMITTED SUICIDE OR GOT KILLED
OR DIED OTHERWISE PRIOR TO BEING
APPREHENDED.

>> THE OTHER SIDE, WHAT YOU ARE
SAYING IN YOUR IDENTITY POINT,
IF YOU ARE A VICTIM AND YOU END
UP GOING THROUGH THE CRIMINAL
PROCESS, THE CRIMINAL
PROCEEDINGS YOU ARE NOT GOING TO
GET YOUR IDENTITY PROTECTED BUT
IF YOU HAVE BEEN A VICTIM, WHERE
THE VICTIMIZER IS GONE AND
THEREFORE CANNOT -- THERE'S
GOING TO BE NO CRIMINAL PROCESS
YOU GET THE BENEFIT OF THAT.
CREATE A SYMMETRY THERE WHERE
MOST VICTIMS WILL HAVE THEIR
IDENTITY REVEALED IN THE
ORDINARY COURSE OF THINGS IN THE
CRIMINAL PROCEEDING BUT A
CERTAIN SUBSET OF VICTIMS
ASSUMING YOUR ARGUMENT IS
ACCEPTED, WOULD NOT HAVE THEIR
IDENTITY -- THAT DOES SEEM A
KIND OF ANOMALOUS RESULT.

MAYBE THAT'S WHAT THE LANGUAGE
REQUIRES BUT IT DOES SEEM A
LITTLE ODD.

>> BACK TO WHAT I WAS TALKING
ABOUT EARLIER, I'M NOT READY TO
CONCEDE AND IF YOU ARE A VICTIM,
THAT THERE AREN'T PROTECTIONS
THAT HAPPEN IN THE CONTEXT OF
CRIMINAL PROSECUTION TO PROTECT
YOUR IDENTITY.

I'M NOT READY TO CONCEDE THAT.
THE COURT HAS HANDLED THOSE
CASES IN THE PAST, WE ARE NOT
HERE ON A CRIMINAL PROCEDURE
QUESTION, BUT THERE ARE
MECHANISMS.

I DON'T THINK THERE ARE
MECHANISMS.

FOR PROTECTING A VICTIM IN THE
CONTEXT OF CRIMINAL PROSECUTION.

I DON'T THINK -- THE BROADEST OF
MARCY'S LAW LANGUAGE, IF VICTIMS
ARE MOTIVATED TO DO SO, TO GO
INTO, NO COURT AND SAY I WANT
YOU, CIRCUIT COURT JUDGE, TO
PROTECT MY IDENTITY, WHILE STILL
HONORING THE CONFRONTATION
RIGHTS OF THE CRIMINAL.

DOES THAT MAKE SENSE?

DON'T WANT TO GET INTO,
PROCEDURE BUT I'M NOT CONCEDEING
THAT A VICTIM OF A CRIME, A
LIVING, LOOK BEING PROSECUTED BY
THE STATE CAN'T COME INTO COURT
WITH REPRESENTATION OR OTHERWISE
AND SAY I WANT TO PUT IN THE
FOLLOWING PROCEDURE WILL RULES
IN THE CONTEXT OF THIS CASE THAT
WOULD PROTECT MY IDENTITY.

IF IT IS IMPORTANT ENOUGH TO
LITIGATE I DON'T THINK THERE'S
ALWAYS GOING TO BE THAT.

>> UNDER YOUR REASONING EVERY
SINGLE POLICE REPORT THAT GETS
FILED FROM THIS POINT ON WOULD
EXCLUDE A VICTIM'S NAME?

>> IF THE VICTIM REQUESTED, THE
VICTIM REQUESTS AFTER
VICTIMIZATION BEFORE THE REPORT.

>> THE OFFICER IS FILLING OUT
POLICE REPORT FOR A PURSE
SNATCHING, CARJACKING, WHATEVER
THE CASE IS, FILLING OUT A
REPORT, I AM A VICTIM UNDER

MARCY'S LAW.

EVERY POLICE REPORT, EVERYTHING IS EXCLUDED.

>> OUR POSITION IS SOMETHING GOT STOLEN OUT OF MY CAR I WANT TO MAKE A POLICE REPORT, WHATEVER GOT STOLEN IS SENSITIVE TO ME FOR WHATEVER REASON MAYBE INDIVIDUAL REASONS, I WANT TO INVOKE MARCY'S LAW PROTECTIONS, DON'T WANT IT POLICED PUBLICLY. MY INFORMATION OR INFORMATION THAT CAN LEAD TO BEING IDENTIFIED.

>> IF THEY HAVE A DISTINCT PHYSICAL CHARACTERISTIC THAT IS EXCLUDED.

>> IF THAT COULD -- YOU COULD IDENTIFY ME BASED ON MY DISTINCT PHYSICAL CHARACTERISTICS THAN I WOULD AGREE.

SOMETHING LIKE THAT.

UNUSUAL HEIGHT.

>> CAN I ASK ONE THING.

IN TERMS OF THE SCOPE OF WHAT YOU WERE INITIALLY ASKING FOR IN THE PETITION IN THE TRIAL COURT, THIS CASE HAS EVOLVED INTO WHERE THERE'S A LOT OF FOCUS ON THE IDENTITY ISSUE.

OF THE PETITION SAYS ENTER A PRELIMINARY ORDER FROM POLICING ANY PERSONAL INFORMATION USED TO IDENTIFY, THE CASE YOU FALL TO THE POINT WHERE THE ONLY PIECE OF INFORMATION AT ISSUE IS THE NAME OR IS THERE SOME OTHER IF THE NAME WEREN'T INCLUDED WITH THEIR STILL NEED TO BE SOME SORT OF ACKNOWLEDGMENT THAT AT LEAST PART OF WHAT YOU ARE ASKING FOR WOULD STILL BE AT ISSUE?

>> WE TALKED ABOUT THIS WHEN WE WERE IN CIRCUIT COURT, THE BADGE NUMBER IDENTIFYING INFORMATION IS OUT.

IT DOESN'T INCLUDE JUST NAMES AND A BADGE NUMBER.

THANK YOU SO MUCH.

I WILL QUOTE MY COLLEAGUE FROM MEDIA THAT THESE OFFICERS, JOHN THE ONE AND 2 FOR WHICH THE COMMUNITY SHOULD BE PROUD.

I SUBMIT THE VIDEOS RELEASED IN

THIS CASE HAVE BEEN PUBLISHED TO THE PUBLIC.

MY CLIENTS ARE EXEMPTED, EXEMPLARY OFFICERS FOR WHICH THE COMMUNITY SHOULD BE PROUD.

>> YOU CAN HAVE 3 MINUTES.

>> LET ME AGREE WITH MR.

NEWMAN, THE CASE IS NOT ABOUT THEM.

GOING TO A POINT THAT YOU MADE ABOUT THE NEED FOR A PROCEEDING ONE THING I NEGLECTED TO SAY, IT SAYS SEEKING ENFORCEMENT OF THE RIGHTS OF A TRIAL OF APPELLATE COURT OR ANY OTHER AUTHORITY WITH JURISDICTION OVER THE CASE.

WHAT THAT TELLS ME IS THERE MUST BE A CASE OF SOME SORT, WHETHER SOMEBODY FILES AN ARREST WARRANT OR STARTS A BAIL HEARING, SOMETHING HAS TO HAPPEN.

>> THE EARLIER YOU CONCEDED THERE HAS TO BE A CASE IN ORDER FOR THE RIGHT TO BE EXERCISED. YOU CONCEDED THE RIGHT HAS ACCRUED.

>> I DO AGREE WITH THAT, THERE IS A RIGHT THAT CAN LATER COME INTO BEING, MAYBE THAT PERSON CAN GET RESTITUTION AND ALL SORTS OF OTHER THINGS CAN OCCUR. COUNSEL HAS CHARACTERIZED THEIR ARGUMENT AS USING SUBSTANTIVE CANONS GOING BEYOND THE TEXT, THAT IS NOT WHAT WE ARE ARGUING. IT IS BASED ON THE TEXT AND I DON'T THINK IT IS AN INCORRECT ARGUMENT TO SAY IF THE TERM CAN BE CONSTRUED IN DIFFERENT WAYS. WE KNOW THAT THE UNITED STATES SUPREME COURT SAID STATE OFFICIALS ARE NOT PERSONS WITH THE MEANING OF SECTION 1983. THEY ARE OBVIOUSLY HUMAN BEING.

>> A SINGLE CONSTITUTIONAL PRECEDENT YOU WANT TO OWN WHERE THE HUMAN BEING WAS DEEMED NOT A PERSON FOR PURPOSES OF LAW.

I AM SAYING OF THE CANON OF CASES THAT HOLD THAT A HUMAN BEING IS NOT A PERSON UNDER ANY CIRCUMSTANCE IS NOT A CANON OF CASES YOU WANT TO OWN.

>> THAT IS NOT MY ARGUMENT.

A PERSON CAN BE A HUMAN BEING
UNDER MOST CIRCUMSTANCES BUT IN
SOME CIRCUMSTANCES, SECTION 1983
CASE.

>> LET'S TAKE TORTS OFF THE
TABLE.

A CONSTITUTIONAL RIGHT GIVEN TO
PERSONS THAT EXCLUDES ANY HUMAN
BEING, CITE A CASE FOR ME THAT
YOU WANT TO BE PART OF YOUR
BRIEF, I SUBMIT TO YOU THERE IS
NO CASE THAT ASSIGNS A
CONSTITUTIONAL RIGHT TO PERSONS
THAT YOU WANT TO OWN THAT
EXCLUDES SOME HUMAN BEINGS, YOU
CONCEDE THAT?

>> I DON'T KNOW OF ONE BUT
COURTS HAVE CONSISTENTLY --

>> PLESSIS.

>> ALL RIGHT.

LET ME JUST SAY THAT ON YOUR
POINT ABOUT THE ANONYMITY.
THE AMICUS BRIEFS, THERE IS A
LOT ABOUT THAT.

THEY ACTUALLY, IF POLICE
OFFICERS END UP REMAINING
ANONYMOUS.

THANK YOU.

>> THANK YOU.