No. 19-_____

IN THE
Supreme Court of the United States

UNITED STATES OF AMERICA,

Respondent,

v.

BACARI MCCARTHREN,

Petitioner.

On Petition for a Writ of Certiorari
To the United States Court of Appeals
For the Eleventh Circuit

PETITION FOR A WRIT OF CERTIORARI

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QUESTION PRESENTED

The Florida crime of aggravated battery may qualify as a crime of violence under Section 4B1.2 of the United States Sentencing Guidelines only if the minimum conduct that satisfies the statute involves the "use, attempted use, or threatened use of physical force." A court must answer that question by way of the categorical approach, but the Eleventh Circuit instead applies a forbidden fact-based path. Why? Because it holds firm to an outdated precedent that has been abrogated by this Court's jurisprudence in *Decamps* and *Mathis*.

Under the proper categorical approach, does the Florida crime of aggravated battery with a deadly weapon categorically require the use, threatened use, or attempted use of physical force against another person?

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PETITION FOR A WRIT OF CERTIORARI

Petitioner Bacari McCarthren respectfully petitions for a writ of certiorari to review the judgment of the United States Court of Appeals for the Eleventh Circuit.

OPINION & ORDERS BELOW

The unpublished opinion of the Eleventh Circuit, *United States v. McCarthren*, 707 Fed. Appx. 951 (11th Cir. 2017) (unpublished), is included in the appendix below. Pet. App. 1. The unpublished order of the Eleventh Circuit denying the petition for rehearing en banc, *United States v. McCarthren* (11th Cir. 2019), is also attached here. Pet. App. 5.

JURISDICTION

The Eleventh Circuit filed its opinion on December 20, 2017, affirming Mr. McCarthren's sentence. On May 1, 2019, the same court filed an order denying Mr. McCarthren's petition for rehearing en banc. This Court later extended to September 30, 2019, the time to file a petition for writ of certiorari. Therefore, Mr. McCarthren has filed this petition on time. This Court has jurisdiction under 28 U.S.C. § 1254(1), which permits review of criminal cases in the courts of appeals.

STATUTORY PROVISIONS INVOLVED

Section 4B1.2(a), the crime of violence definition in the United States Sentencing Guidelines, provides the following:

The term "crime of violence" means any offense under federal or state law, punishable by imprisonment for a term exceeding one year, that—

(1) has as an element the use, attempted use, or threatened use of physical force against the person of another, or

(2) is murder, voluntary manslaughter, kidnapping, aggravated assault, a forcible sex offense, robbery, arson, extortion, or the use or unlawful possession of a firearm described in 26 U.S.C. § 5845(a) or explosive material as defined in 18 U.S.C. § 841(c).

Fla. Stat. § 784.03—Battery provides the following:

(1)(a) The offense of battery occurs when a person: (1) [a]ctually and intentionally touches or strikes another person against the will of the other; or (2) [i]ntentionally causes bodily harm to another person.

Fla. Stat. § 784.045—Aggravated Battery provides the following:

(1)(a) A person commits an aggravated battery who, in committing battery: (1) [i]ntentionally or knowingly causes great bodily harm, permanent disability, or permanent disfigurement; or (2) [u]ses a deadly weapon.

STATEMENT OF THE CASE

A. Mr. McCarthren's Conviction and Sentence.

Six years ago, Mr. McCarthren pled guilty to a single federal crime: possession with intent to distribute cocaine in violation of 21 U.S.C. § 841(a). At the sentencing hearing, the district court applied the career offender provision of the United States Sentencing Guidelines based upon a pair of alleged crimes of violence, including a Florida conviction for "aggravated battery with a firearm." The career-offender enhancement sharply elevated the advisory guideline range to 210-240 months imprisonment. The district court imposed a sentence of 240 months imprisonment.

Mr. McCarthren appealed the sentence, but his then-attorney filed an *Anders* brief. The Eleventh Circuit affirmed the sentence and dismissed the appeal. This Court later granted Mr. McCarthren's *pro se* petition for writ of certiorari, vacated the Eleventh Circuit's judgment, and remanded the case "for further consideration in light of *Johnson v. United States*, 576 U.S. — (2015)." The Eleventh Circuit appointed undersigned counsel, who filed an initial brief in which he argued that Mr. McCarthren's Florida aggravated battery conviction does not qualify as a crime of violence under the United States Sentencing Guidelines.

The government filed a motion to dismiss the appeal based on an appeal waiver in Mr. McCarthren's long-ago plea agreement. The panel first granted the motion to dismiss based on that waiver, but after receiving Mr. McCarthren's petition for panel rehearing, the panel

changed course and issued a substitute opinion. The panel concluded that the government had waived its right to enforce the appeal waiver, and moved on to consider the merits of the appeal.

The Eleventh Circuit panel rejected Mr. McCarthren's challenge to the Florida aggravated battery statute without much discussion because it was bound to follow circuit precedent: "Although some members of our court have questioned the continuing validity of *Turner*, we remain bound to follow it." So what did *Turner* hold?

B. The Eleventh Circuit's Flawed *Turner* Rule.

In *Turner v. Warden Coleman FCI (Medium)*, the Eleventh Circuit held that a Florida aggravated battery conviction fits within the ACCA's elements clause.[1] As it did so, the appeals court applied (or purported to apply) the modified categorical approach: "We need not belabor the point here because Turner's conviction—which stemmed from his stabbing a man in the chest—is indubitably a violent felony under the elements clause."[2] The panel quoted the elements clause and cited this Court's declaration in *Curtis Johnson v. United States* that the elements clause's term "physical force" means "violent force—that is, force capable of causing physical pain or injury to another person." The *Turner* court said little else, as if the act of "stabbing a man in the chest" is an all-too-obvious violent felony, one that requires no legal analysis.

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[1] 709 F.3d 1328, 1341 (11th Cir. 2013).

[2] *Id.*

But the *Turner* opinion got the modified categorical approach all wrong. To be fair, the opinion arrived in February 2013, before this Court's *Descamps* and *Mathis* opinions, decisions in which this Court constructed the proper template for applying the categorical approach (and its partner, the modified categorical approach. Although the Eleventh Circuit's *Turner* decision has been abrogated most recently by *Mathis*, that court continues to prop up its obsolete rule, and did so yet again here in Ms. McCarthren's own case.

The Eleventh Circuit has chosen not to revisit *Turner* in spite of many invitations to do so. For example, the court denied Mr. McCarthren's own overture through an en banc petition. But it is time for this Court to step in and do what the Eleventh Circuit has refused to do, properly apply the categorical (and modified categorical) approach to this Florida statute. In the end, this Court should strike the Florida aggravated battery statute from the roster of crimes of violence.

REASONS FOR GRANTING THE PETITION

A Florida conviction for aggravated battery does not categorically involve the use, attempted use, or threatened use of physical force, and the Eleventh Circuit's precedent to the contrary, *Turner*, has been abrogated by *Descamps* and *Mathis*.

Does the Florida crime of aggravated battery categorically fit within the elements clause of the sentencing guidelines' crime of violence definition? More than six years ago, in *Turner*, a panel of this Court answered the query with a "Yes."[3] But this Court's opinions in *Descamps v. United States* and *Mathis v. United States* have undermined *Turner* to the point of abrogation.[4] The holding in *Turner*, if it was once right, is now wrong.

We now know, as we peer back in time with the benefit of *Descamps* and *Mathis*, that the *Turner* panel employed the wrong tool in measuring the statute: a non-categorical, fact-based approach: "Turner's conviction—which stemmed from his stabbing a man in the chest—is

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[3] 709 F.3d at 1341. Although *Turner* measured the aggravated battery statute against the elements clause found in the Armed Career Criminal Act's violent felony definition, the ruling applies to the identical elements clause found in the sentencing guidelines' crime of violence definition. *Gilbert v. United States*, 640 F.3d 1293, 1309 n.16 (11th Cir. 2011).

[4] 570 U.S. 254 (2013); 136 S. Ct. 2243 (2016).

indubitably a violent felony under the elements clause."[5] This Court's analysis in *Mathis*—the admonition that courts must generally employ the categorical approach (and its related modified categorical approach), rather than a fact-based approach—repudiates the Eleventh Circuit's contrary analysis in *Turner*. In the end, the Florida aggravated battery conviction does not *categorically* involve the use, attempted use, or threatened use of physical force against another and, therefore, cannot be a crime of violence under the sentencing guidelines.

A. The Florida aggravated battery statute is no longer a crime of violence because the minimum conduct that satisfies the statute does not involve the use, attempted use, or threatened use of physical force.

The Florida crime of aggravated battery is defined this way: (1)(a) A person commits aggravated battery who, in committing battery: (1) intentionally or knowingly causes great bodily harm, permanent disability, or permanent disfigurement; or (2) uses a deadly weapon.[6] A person commits "battery" when he "actually and intentionally touches or strikes another person against the will of the

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[5] 709 F.3d at 1341.

[6] FLA. STAT. § 784.045. The crime includes an alternative variety—(b) A person commits aggravated battery if the person who was a victim of the battery was pregnant at the time of the offense and the offender knew or should have known that the victim was pregnant—but that version of the crime does not bear on the question before this Court.

person, or intentionally causes bodily harm to another person."[7]

The aggravated battery statute is divisible into at least two distinct crimes. The first is defined in subsection (a)(1) (great bodily harm or deadly weapon) and the second in subsection (a)(2) (pregnant victim).[8] Therefore, a court may (indeed, it must) employ the modified categorical approach for but a moment—a fleeting "peek," said this Court in *Descamps* and *Mathis*—in order to identify which sub-part of the crime a defendant violated.[9]

So which variant of the crime did Mr. McCarthren commit? In his aggravated battery conviction, the indictment alleged that Mr. McCarthren committed "aggravated battery with a firearm." Thus, Mr. McCarthren was convicted of violating the deadly weapon portion of subsection (a)(1). The modified categorical approach plays no more role than that. A reviewing Court

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[7] FLA. STAT. § 784.03(a)(1).

[8] *Dixon v. United States*, 588 Fed. Appx. 918, 922 (11th Cir. 2014) (unpublished).

[9] *Descamps*, 570 U.S. at 258 ("[T]he modified categorical approach permits sentencing courts to consult a limited class of documents, such as indictments and jury instructions, to determine which alternative formed the basis of the defendant's prior conviction. The court can then do what the categorical approach demands: compare the elements of the crime of conviction (including the alternative element used in the case) with the elements of the generic crime.")

must then put away the indictment and the other state court documents and turn to the now-familiar categorical approach. The "peek" practice, warned this Court in *Mathis*, is "not to be repurposed as a technique for discovering whether a defendant's prior conviction . . . rested on facts (or otherwise said, involved means) that also could have satisfied the elements of a generic offense."[10] This is where the Eleventh Circuit went wrong in *Turner*, the binding precedent that has blocked Mr. McCarthren's path to relief.

B. The *Turner* panel's errant use of, and misunderstanding of, the modified categorical approach

A bit of background: This Court's decision in *Taylor v. United States* established the rule for determining when a defendant's prior conviction may properly induce a sentencing enhancement. Under *Taylor's* categorical approach, courts may "look only to the statutory definitions"—that is, the elements—of a defendant's prior offenses, and not "to the particular facts underlying those offenses."[11]

In *Mathis*, the Court confirmed the central pillar of the categorical approach—a prior conviction matches a generic federal crime "if, and only, if its elements are the same as, or narrower than, those of the generic offense."[12] The mere

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[10] *Mathis*, 136 S. Ct. at 2254.

[11] 495 U.S. 575, 600 (1990).

[12] 136 S. Ct. at 2247.

fact that a statute contains an "itemized construction" of possible ways in which the crime may be committed, gives a sentencing court "no special warrant to explore the facts of an offense, rather than to determine the crime's elements and compare them with the generic definition."[13]

The *Mathis* path includes a series of checkpoints: the case law in the state's appellate courts, the text of the statute, and the penalties set forth in the statute.[14] According to the Court, a district court must rely only on these sources of state law, if it can. If, and only if, these sources do not "speak plainly," if "state law fails to provide clear answers, federal judges have another place to look: the record of a prior conviction itself."[15]

In *Mathis*, this Court explicitly limited the scope of that glimpse into the record documents. The practice (the modified categorical approach) is "not to be repurposed as a technique for discovering whether a defendant's prior conviction . . . rested on facts (or otherwise said, involved means) that also could have satisfied the elements of a generic offense."[16]

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[13] *Mathis,* 136 S. Ct. at 2247.

[14] *Id.* at 2256.

[15] *Id.* at 2256-2257 & n.7 ("[W]hen state law does not resolve the means-or-elements question, courts should 'resort[] to the [record] documents' for help in making that determination.")

[16] *Id.* at 2254.

But repurposing is precisely what the Eleventh Circuit's *Turner* panel did when it relied heavily upon the facts of that defendant's crime. The court gave lip service to the modified categorical approach, but its use of that tool betrayed this Court's teachings. The foundation of the *Turner* holding—the verboten fact-based observation that Turner's conviction "stemmed from his stabbing a man in the chest"—has been thoroughly undermined by *Mathis*.[17]

The *Turner* panel not only peeked at the state court records and the facts in that defendant's own crime, but it embraced them with eyes wide open. But the law commands courts not to dive into the facts of a defendant's own crime at all. *Mathis* tells us so. The *Turner* panel chose the wrong path, a path that led it to the wrong destination, that is, an erroneous conclusion that a Florida aggravated battery conviction is inevitably a crime of violence. This binding rule now spreads like a virus to all succeeding cases, including Mr. McCarthren's.

C. The proper, categorical approach to the Florida aggravated battery statute.

A proper (and limited) peek at Mr. McCarthren's source documents illuminates his variant of aggravated battery: aggravated battery with a firearm. A court must then put away the source documents and instead rely upon the categorical approach. This approach requires that a court look only to the statutory definitions—i.e., the elements—

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[17] *Turner*, 709 F.3d at 1341.

of the offense, but not to the facts behind the crime.[18] Again, because the *Turner* panel veered into the facts of that defendant's crime to hold that aggravated battery meets the elements clause, and because the *Turner* rule has now infected later cases, like Mr. McCarthren's, this Court should take a fresh look at the statute.

Under the categorical approach, an offense can only qualify as a crime of violence if all of the criminal conduct covered by a statute, including the least culpable conduct, matches or is narrower than the crime of violence definition.[19] If the most innocuous conduct penalized by a statute does not constitute violent force, then the statute categorically fails to qualify as a violent felony.[20]

A state crime will qualify as a crime of violence only if it has as an element "the use, attempted use or threatened use of physical force against the person of another."[21] In *Leocal v. Ashcroft*, this Court held that "'use' requires active employment," rather than "negligent or merely accidental conduct."[22] And later, in *Curtis Johnson*, this Court interpreted the term "physical force" to mean "*violent* force—that is, force capable of causing physical

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[18] *Esquivel-Quintana v. Sessions*, 137 S. Ct. 1562, 1568 (2017).

[19] *Moncrieffe v. Holder*, 133 S. Ct. 1678, 1684 (2013).

[20] *Esquivel-Quintana*, 137 S. Ct. at 1569.

[21] U.S.S.G. § 4B1.2(a).

[22] 543 U.S. 1, 9 (2004).

pain or injury to another person."[23] The Court restated the crucial message of *Leocal*, that "[t]he ordinary meaning of [a violent felony] . . . suggests a category of violent, active crimes."[24] Lower courts have declared this to mean that the crime must be one of "intentional conduct."[25] These threads weave an elements-clause cloak that requires that a defendant (i) actively employ (ii) violent force against another person. A court must measure the Florida aggravated battery statute against these tenets.

D. The minimum conduct necessary to commit an aggravated battery with a deadly weapon does not involve the use (or active employment) of violent force.

We begin with an ever-so brief examination of aggravated battery's foundation: battery. A Florida battery is this: (1) actually and intentionally touching or striking another person against his will; or (2) intentionally causing bodily harm to another person.[26] We must first ask which form of the crime formed the foundation for Mr. McCarthren's own crime. The record below, including the presentence report, does not answer this question. Therefore, if either of these versions of battery falls outside

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[23] 559 U.S. 133, 140 (2010) (emphasis in original).

[24] *Id*.

[25] *United States v. McFalls*, 592 F.3d 707, 716 (6th Cir. 2010).

[26] FLA. STAT. §784.03(1)(a).

the elements clause, then Mr. McCarthren's too must fall outside the elements clause.

Let's start with the first variant: the "touching or striking" form of battery. Is that subsection divisible or indivisible? If it is indivisible, then the question will be resolved by this Court's opinion in *Curtis Johnson*. There this Court held that a Florida battery conviction based on "touching" is categorically not an ACCA violent felony because it may be committed by "proof of only the slightest unwanted physical touch," such as a mere "tap on the shoulder without consent."[27] This is not "physical force," which means "force capable of causing physical pain or injury to another person."[28] Because Florida battery, "is satisfied by any intentional physical contact, 'no matter how slight,'" it does not categorically require such force.[29]

But what of "touching and striking"? Florida's standard jury instructions clarify that "touch or strike" are simply alternative means of committing this single indivisible element of the offense, so Florida judges never instruct jurors to choose between, or agree upon, the "touch" or

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[27] 559 U.S. at 137-138. The Florida jury instructions, set out "touch" and "strike" as alternative, interchangeable means within a single element. FLA. STD. JURY INSTR. (CRIM.) 8.4, available at https://jury.flcourts.org/criminal-jury-instructions-home/criminal-jury-instructions/sji-criminal-chapter-8/ (last visited September 27, 2019).

[28] *Curtis Johnson*, 559 U.S. at 140.

[29] *Id.* at 138, 141 (quoting *State v. Hearns,* 961 So.2d 211, 218 (Fla. 2007)).

"strike" alternatives.[30] Florida's standard jury instruction for battery provides: "To prove the crime of Battery, the State must prove the following elements beyond a reasonable doubt. *Give 1 or 2 as applicable.* (1) [(Defendant) intentionally touched or struck (victim) against [his] [her] will]; (2) [(Defendant) intentionally caused bodily harm to (victim)]."[31] As if that were not enough, Florida case law, too, makes obvious that the first element of both simple battery—that is, "touching or striking"—is not itself further divisible.[32] The Eleventh Circuit itself agrees with this assessment.[33] Therefore,

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[30] *Mathis,* 136 S. Ct. at 2256-2257 (jury instructions clarify whether a statutory alternative is an element the prosecutor must prove to the jury beyond a reasonable doubt, or "only a possible means of commission" on which proof beyond a reasonable doubt is not required).

[31] FLA. STD. JURY INSTR. (CRIM.) 8.3, available at https://jury.flcourts.org/criminal-jury-instructions-home/criminal-jury-instructions/sji-criminal-chapter-8/ (last visited September 27, 2019).

[32] *See State v. Weaver,* 957 So.2d 586, 587-589 (Fla. 2007) ("touching or striking" and "causing bodily harm" constitute two forms of simple battery, with "touching or striking" representing a single "form"); *see also Jaimes v. State,* 51 So.3d 445, 449 (Fla. 2010) ("intentional touching or striking" is one "form" of simple battery).

[33] *See Preston Johnson v. United States,* 735 Fed. Appx. 1007, 1012-1014 (11th Cir. 2018) (unpublished) (noting that Florida jury instructions treat "touching or striking" as a single element).

because "touching" falls outside the boundaries of the elements clause, per *Curtis Johnson*, so too must "touching and striking."

The government agrees. In response to at least two recent petitions for writ of certiorari, the government conceded that the Florida battery statute is divisible into only two offenses, and "the offense of 'touching or striking' battery is not further divisible because 'touching' and 'striking' refer to alternative ways to commit a single offense, not alternative elements."[34] This Court accepted those concessions and GVR'd the pair of cases back to the Eleventh Circuit.[35]

These concessions are relevant here as well, although it is not dispositive since aggravated battery has a second element. So what of that aggravating element? We must assume here that Mr. McCarthren was convicted of the least culpable of the state statute's forbidden acts: the "touching" of another person "with a deadly weapon."[36]

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[34] *See Santos v. United States*, No. 18-7096, Memorandum for the United States at 4-6 (filed March 21, 2019) (addressing the Florida crime of battery on a law enforcement officer); *Franklin v. United States,* No. 17-8401, Memorandum for the United States (filed July 6, 2018) (same).

[35] *Santos*, 139 S. Ct. 1714 (May 20, 2019); *Franklin*, 139 S. Ct. 1254 (Feb. 25, 2019).

[36] *Moncrieffe,* 569 U.S. at 191.

We know from *Curtis Johnson* that touching another person against his will does not categorically qualify as the "use, attempted use, or threatened use of physical force against the person of another." And here we have the same mere touching at issue in *Curtis Johnson*, but simply with the presence of a deadly weapon. While this Court's precedents required the courts below to examine whether under Florida case law, a touching "with a deadly weapon" categorically requires the use of "violent force," neither the district court nor the court of appeals engaged in the required exploration of Florida law. Why not? Because such an exploration was futile in light of the Eleventh Circuit's binding precedent: the flawed *Turner* opinion.

In *Turner*, once again, the Eleventh Circuit simply assumed (without any examination of case law) that the "use of a deadly weapon" element presumptively requires the use of violent force. But that was wrong, again, because *Turner's* superficial reasoning and methodology—the mere observation that that defendant stabbed another man with a knife—have been abrogated by this Court's intervening precedent *Mathis*.

Had the Eleventh Circuit explored the deadly-weapon topic categorically, as it should have done, this is what it would have found: The "deadly weapon" element in subsection (a)(1) is no stronger than the battery element and cannot stand on its own. A Florida battery committed by use of a deadly weapon is accomplished, at the minimum, when a person simply taps another on the shoulder while holding a deadly weapon. A defendant need merely possess a deadly weapon while otherwise touching

another person.[37] Under Florida law, a person need not use the firearm to make contact; he may tap with one hand and hold a weapon with another. He need not intend to threaten or cause harm. The plain presence of a weapon establishes an aggravated battery, but not a federal crime of violence.[38] The Eleventh Circuit, in *Turner* offered no discussion of this Florida case law.

The phrase "uses a deadly weapon" simply does not supply the elements-clause link absent from the battery statute. This Court may now do what the Eleventh Circuit has refused to do: apply *Mathis* and the categorical approach, engage the Florida case law, and declare at last that Mr. McCarthren's Florida aggravated battery conviction is not a crime of violence.

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[37] *See Severance v. State*, 972 So.2d 931, 934 (Fla. Dist. Ct. App. 2007) (overruling prior precedent and holding that the "use a deadly weapon" element in the aggravated battery statute does not require the actor use the weapon in committing the forbidden touching). It is unnecessary that a defendant use the weapon to commit the touching; it is enough that he "hold[s] a deadly weapon without actually touching the victim with the weapon." *Id.*

[38] "Not every crime becomes a crime of violence when committed with a deadly weapon. . . . The use of a deadly weapon may exacerbate the threat of physical force, but does not necessarily supply the threat if it is not already present in the underlying crime." *United States v. Rede-Mendez*, 680 F.3d 552, 558 (6th Cir. 2012).

E. Mr. McCarthren's case is an ideal vehicle to resolve the crime-of-violence fate of the Florida aggravated battery statute.

Mr. McCarthren's case presents this Court with a fine opportunity to cure the Eleventh Circuit's mistake. His harsh, 20-year prison sentence depends entirely upon the fate of the Eleventh Circuit's *Turner* rule. The appeals court resolved his case only upon that ground, and no other. If this Court rejects the Eleventh Circuit's path here, then Mr. McCarthren will gain relief from his harsh career offender sentence. And he is not alone. Although this issue may appear to be provincial, it is widespread and recurring in the Eleventh Circuit.[39] This Court has received (and denied) similar certiorari petitions in the recent past.[40] There is much at stake for each defendant in these career-offender cases, cases with long prison terms. In the end, the Eleventh Circuit's flawed application of the modified categorical approach can be corrected nowhere else but here.

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[39] *See, e.g., United States v. Vereen*, 920 F.3d 1300, 1313-1314 (11th Cir. 2019) (applying *Turner*, without its own independent analysis, to aggravated battery statute).

[40] *See Thornton v. United States*, No. 18-7443, 139 S. Ct. 1276 (petition denied February 25, 2019); *Maida v. United States,* No. 17-6424, 138 S. Ct. 979 (petition denied Feb. 20, 2018).

CONCLUSION

The Court should grant the petition for a writ of certiorari.

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