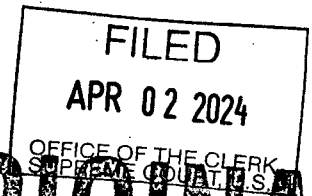


23-7266
No. _____



ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES

NATHANIEL O. ROBINSON — PETITIONER
(Your Name)

VS.

STATE OF LOUISIANA — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

STATE OF LOUISIANA COURT OF APPEAL, FOURTH CIRCUIT
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

NATHANIEL O. ROBINSON, # 748245
(Your Name)

ALLEN CORRECTIONAL CENTER
3751 LAUDERDALE WOODYARD RD.
(Address)

KINDER, LA 70648
(City, State, Zip Code)

N | A
(Phone Number)

QUESTION(S) PRESENTED

IN **RAMOS V. LOUISIANA**, THIS COURT HELD THAT THE SIXTH AMENDMENT TO THE UNITED STATES CONSTITUTION, EXTENDED TO THE STATES BY WAY OF THE FOURTEENTH AMENDMENT, REQUIRED THAT A UNANIMOUS JURY MUST FIND A DEFENDANT GUILTY OF A SERIOUS OFFENSE IN LOUISIANA. **RAMOS V. LOUISIANA**, 590 U.S. ___, 140 S. CT. 1390, 206 L. ED. 2D 583 (2020). THIS INCLUDED CASES THAT WERE PENDING ON DIRECT REVIEW WHEN **RAMOS V. LOUISIANA** WAS DECIDED. **GRIFFITH V. KENTUCKY**, 479 U.S. 314, 328, 107 S. CT. 708, 716, 93 L. ED. 2D 649 (1987). EVIDENCE OF A JURY COUNT EXISTS THROUGH A QUESTION FROM THE TRIAL JUDGE TO THE JURY CONFIRMING THAT AT LEAST 10 JURORS AGREED TO THE VERDICT AND AN ANSWER FROM THE JURY FOREPERSON RESPONDING YES. THE COURT OF APPEAL, FOURTH CIRCUIT ACKNOWLEDGED THAT THE QUESTION OF UNANIMITY REMAINED UNRESOLVED WITH NOTHING DEFINITELY SAYING WHETHER THE JURY'S VOTES WERE 10-2, 11-1, OR 12-0 BUT HELD THAT THE JURY VERDICTS WERE 12-0 NONE THE LESS. THE QUESTION PRESENTED BY THESE CIRCUMSTANCES IS:

WHETHER A CONVICTION CAN BE OBTAINED, IN LIGHT OF THIS COURT'S HOLDING IN **RAMOS V. LOUISIANA** THAT THE SIXTH AMENDMENT REQUIRES A UNANIMOUS JURY TO CONVICT, WHEN THE RECORD DOES NOT AFFIRMATIVELY INDICATE THAT THE JURY WAS UNANIMOUS, EVIDENCE OF A JURY COUNT EXISTING, AND NO POLLING BEING CONDUCTED.

LIST OF PARTIES

- [✓] All parties appear in the caption of the case on the cover page.
- [] All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

RELATED CASES

STATE OF LOUISIANA V. NATHANIEL O. ROBINSON, LOUISIANA SUPREME COURT, NO. 2023-K-00661, NOT YET REPORTED AT 2024 WL 1067509 ORDER NOT CONSIDERING TIMELY FILED APPLICATION FOR RECONSIDERATION ENTERED ON MARCH 12, 2024.

STATE OF LOUISIANA V. NATHANIEL O. ROBINSON, LOUISIANA SUPREME COURT, NO. 2023-K-00661, REPORTED AT 374 So.3d 982 (La. 12/19/23). ORDER DENYING REVIEW OF THE COURT OF APPEAL FOURTH CIRCUIT'S RULING ENTERED ON DECEMBER 19, 2023.

STATE OF LOUISIANA V. NATHANIEL O. ROBINSON, LOUISIANA COURT OF APPEAL, FOURTH CIRCUIT, NO. 2021-KA-0254, NOT YET REPORTED AT 2023 WL 2926359 (La. App. 4 Cir. 4/13/23). OPINION AFFIRMING CONVICTION FOLLOWING REMAND ENTERED ON APRIL 13, 2023.

STATE OF LOUISIANA V. NATHANIEL O. ROBINSON, LOUISIANA COURT OF APPEAL, FOURTH CIRCUIT, NO. 2021-KA-0254, REPORTED AT 336 So.3d 567 (La. App. 4 Cir. 2/18/22). OPINION REMANDING CASE TO TRIAL COURT DUE TO THE RECORD NOT DEMONSTRATING WHETHER VERDICTS WERE UNANIMOUS OR NON-UNANIMOUS ENTERED ON FEB. 18, 2022.

STATE OF LOUISIANA V. NATHANIEL O. ROBINSON, PARISH OF ORLEANS CRIMINAL DISTRICT COURT, NO. 537-889, NOT REPORTED. JUDGMENT OF CONVICTION ENTERED ON AUGUST 7, 2019.

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IN THE
SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

☐ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix _____ to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the United States district court appears at Appendix _____ to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

☒ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix C to the petition and is

- ☐ reported at _____; or,
☒ has been designated for publication but is not yet reported; or, 2023 WL 2926359
☐ is unpublished.

The opinion of the COURT OF APPEAL, FOURTH CIRCUIT court appears at Appendix D to the petition and is

- ☒ reported at 336 So.3d 567; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was _____.

☐ No petition for rehearing was timely filed in my case.

☐ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ____ A ____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☒ For cases from **state courts**:

The date on which the highest state court decided my case was 12/19/13.
A copy of that decision appears at Appendix B.

☒ A timely petition for rehearing was thereafter denied on the following date: 3/12/2024, and a copy of the order denying rehearing appears at Appendix A.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ____ A ____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

THE SIXTH AMENDMENT TO THE UNITED STATES CONSTITUTION PROVIDES IN RELEVANT PART: " IN ALL CRIMINAL PROSECUTIONS, THE ACCUSED SHALL ENJOY THE RIGHT TO A ... TRIAL, BY AN IMPARTIAL JURY."

THE FOURTEENTH AMENDMENT TO THE UNITED STATES CONSTITUTION PROVIDES IN RELEVANT PART: " NO STATE SHALL MAKE OR ENFORCE ANY LAW WHICH SHALL ABRIDGE THE PRIVILEGES OR IMMUNITIES OF CITIZENS OF THE UNITED STATES ; NOR SHALL ANY STATE DEPRIVE ANY PERSON OF LIFE, LIBERTY, OR PROPERTY, WITHOUT DUE PROCESS OF LAW."

AT THE TIME OF TRIAL IN THIS CASE, SECTION 17(A) OF ARTICLE I OF THE LOUISIANA CONSTITUTION OF 1974 PROVIDED IN RELEVANT PART: " A CASE IN WHICH THE PUNISHMENT IS NECESSARILY CONFINEMENT AT HARD LABOR SHALL BE TRIED BEFORE A JURY OF TWELVE PERSONS, TEN OF WHOM MUST CONCUR TO RENDER A VERDICT."

AT THE TIME OF TRIAL IN THIS CASE, ARTICLE 782(A) OF THE LOUISIANA CODE OF CRIMINAL PROCEDURE PROVIDED IN RELEVANT PART: " CASES IN WHICH PUNISHMENT IS NECESSARILY CONFINEMENT AT HARD LABOR SHALL BE TRIED BY A JURY COMPOSED OF TWELVE JURORS, TEN OF WHOM MUST CONCUR TO RENDER A VERDICT."

STATEMENT OF THE CASE

ON AUGUST 7, 2019, FOLLOWING DELIBERATIONS, THE JURY ENTERED THE COURTROOM TO ANNOUNCE ITS VERDICT. PRIOR TO THE ANNOUNCEMENT, THE HONORABLE JUDGE PAUL BONIN ASKED THE JURY IF THERE WERE AT LEAST TEN JURORS WHO AGREED TO THE VERDICT AND THE JURY FOREPERSON RESPONDED WITH A YES. JUDGE BONIN STATED AT THAT TIME THAT HE WOULD CONFIRM THE COUNT A LITTLE LATER AND MORE DIRECTLY. THE JURY PROCEEDED TO ISSUE ITS VERDICT AFTER WHICH JUDGE BONIN NEVER FOLLOWED UP AS PLANNED ABOUT THE VERDICT COUNT AND NEITHER THE DEFENSE NOR THE STATE REQUESTED POLLING. AT THAT TIME, NON-UNANIMOUS JURY VERDICTS WERE ALLOWED BY LAW FOR OFFENSES COMMITTED PRIOR TO JAN. 1, 2019. THE OFFENSES IN THIS CASE HAD A COMMISSION DATE OF NOV. 2016.

ON FEB. 18, 2022, THE COURT OF APPEAL, FOURTH CIRCUIT ISSUED A REMAND OF THE CASE BACK TO THE TRIAL COURT DUE TO THE RECORD BEFORE IT NOT DEMONSTRATING WHETHER THE VERDICTS WERE UNANIMOUS OR NON-UNANIMOUS. THE TRIAL COURT LATER REPORTED THAT IT WAS UNABLE TO DETERMINE IF THE VERDICTS WERE UNANIMOUS. ON APRIL 13, 2023, THE COURT OF APPEAL, FOURTH CIRCUIT DETERMINED THAT ITS REVIEW OF THE RECORD AND THE TRIAL COURT'S PER CURIAM REVEALED THAT THE QUESTION AS TO THE VERDICTS REMAINED UNRESOLVED AND THAT BASED ON THE QUESTION TO THE JURY BY THE JUDGE THE VERDICTS COULD HAVE BEEN 10-2, 11-1, OR 12-0. THE COURT LATER CONCLUDED THAT THE VERDICT WAS 12-0 BECAUSE NOTHING IN THE RECORD PROVED TO THE CONTRARY.

A WRIT OF CERTIORARI WAS SOUGHT WITH THE LOUISIANA SUPREME COURT WHICH DENIED REVIEW, WITHOUT ASSIGNING REASONS, ON DEC. 19, 2023. AN APPLICATION FOR REHEARING WAS TIMELY SOUGHT AND DENIED ON MARCH 12, 2024.

REASONS FOR GRANTING THE PETITION

THIS HONORABLE COURT SHOULD GRANT THIS PETITION BECAUSE THE LOUISIANA COURT OF APPEAL, FOURTH CIRCUIT HAS DECIDED AN IMPORTANT FEDERAL QUESTION IN A WAY THAT CONFLICTS WITH THIS COURT'S DECISION IN RAMOS V. LOUISIANA. THIS IS A CASE OF WHETHER THE RECORD MUST AFFIRMATIVELY ESTABLISH THAT THE VERDICT TO CONVICT WAS UNANIMOUS IN LIGHT OF THE MANDATE PROVIDED BY THIS COURT IN RAMOS V. LOUISIANA THAT REQUIRES A UNANIMOUS JURY VERDICT; EVIDENCE EXISTS IN THIS CASE OF A JURY COUNT THAT WAS LESS THAN UNANIMOUS BUT NO FORMAL JURY POLL WAS REQUESTED BY NEITHER THE DEFENSE NOR THE STATE.

THE ARGUMENT TO THE COURT OF APPEAL WAS THAT ROBINSON'S CONVICTIONS WERE OBTAINED IN VIOLATION OF HIS CONSTITUTIONAL RIGHT TO A UNANIMOUS VERDICT PURSUANT TO RAMOS, SUPRA. RECOGNIZING THAT RAMOS INVALIDATED THE CONVICTIONS BY NON-UNANIMOUS JURY VERDICTS FOR DEFENDANTS WHOSE CASES WERE STILL ON DIRECT APPEAL, THE COURT FOUND MERIT IN THE CLAIM AND ISSUED ORDERS TO THE TRIAL COURT TO DETERMINE IF THE JURY VERDICT WAS IN-FACT UNANIMOUS. (SEE APP. C, * 3). AFTER RECEIVING THE TRIAL COURT'S PER CURIAM, THE COURT DETERMINED:

[O]UR REVIEW OF THE RECORD AND THE DISTRICT COURT'S PER CURIAM REVEALS THAT THE QUESTION AS TO WHETHER THE VERDICTS CONVICTING DEFENDANT WERE UNANIMOUS REMAINS UNRESOLVED... WE KNOW ONLY THAT AT LEAST TEN OF THE TWELVE JURORS AGREED. THIS MEANS THAT THE JURY VOTES CONVICTING DEFENDANT COULD HAVE BEEN 10-2, 11-1; OR 12-0.

(SEE APP. C, * 3)

NO POLLING WAS CONDUCTED IN THIS CASE BUT THIS DID NOT PRECLUDE THE COURT FROM REVIEWING THE CHALLENGE TO THE UNANIMITY OF THE VERDICT AS AN ERROR PATENT UNDER LOUISIANA LAW RELYING ON STATE V. MONROE, 20-00335 (LA. 6/3/20), 296 So.3d 1002; STATE V. TAYLOR, 19-00946, P.1 (LA. 6/3/20), 296 So.3d 1020, 1021; AND STATE V. COHN, 19-01892, P.1 (LA. 6/3/20), 296 So.3d 1043, 1044. (SEE APP. C, * 6-7). FOLLOWING ITS REVIEW, THE COURT HELD THAT, "THERE IS NOTHING IN THE RECORD TO AFFIRMATIVELY INDICATE THAT THE VERDICTS CONVICTING DEFENDANT WERE ANYTHING BUT UNANIMOUS. THE DISTRICT COURT ASKED THE JURY FOREPERSON IF THERE WERE AT LEAST TEN JURORS IN AGREEMENT, AND THE RESPONSE WAS AFFIRMATIVE. THERE IS NO EVIDENCE IN THE RECORD, TRANSCRIPTS, OR CLERK'S OFFICE THAT THE JURY'S DECISION WAS LESS THAN UNANIMOUS." (SEE APP. C, * 8).

THE COURT INSISTED THAT THERE WAS NOTHING IN THE THE RECORD TO AFFIRMATIVELY INDICATE THAT THE VERDICTS WERE ANYTHING BUT UNANIMOUS; HOWEVER, THE RECORD REVEALED THAT JUDGE BONIN INSTRUCTED THE JURY THAT TEN OUT OF TWELVE OF THEM MUST AGREE TO THE VERDICT. (RECORD ON APPEAL, VOL. 4, P. 296). THIS WAS THE CONTROLLING LAW AT THE TIME. LA CONST. OF 1974, ART. 1 § 17(A); LA. CODE CRIM. P. ART. 782(A).

REASONS FOR GRANTING THE PETITION (CONT...)

THE RECORD ALSO REVEALED THAT THE ONLY EVIDENCE OF A VERDICT COUNT IN THIS CASE WAS THAT AT LEAST TEN PERSONS AGREED TO THE VERDICT. (RECORD ON APPEAL, VOL. 4, P. 308). ADDITIONALLY, THE RECORD REVEALED THAT WHEN THE JURY RETURNED WITH A VERDICT, JUDGE BONIN ASKED THE JURY IF THERE WERE AT LEAST TEN JURORS WHO AGREED TO THEIR VERDICT, AND THE JURY FOREPERSON RESPONDED WITH A YES:

THE COURT: MADAM FOREPERSON, I WANT TO ASK YOU, AND I'LL CONFIRM THIS A LITTLE LATER AND MORE DIRECTLY. AS TO EACH OF THESE VERDICTS, WERE THERE AT LEAST TEN PERSONS WHO AGREED TO THIS VERDICT?

JURY FOREPERSON: YES.

(RECORD ON APPEAL, VOL. 4, P. 308).

THE JURY THEN PROCEEDED TO ISSUE ITS VERDICT, AND THE TRIAL COURT NEVER FOLLOWED UP AS PLANNED ABOUT THE VERDICT COUNT. (RECORD ON APPEAL, VOL. 4, PP. 308-314). AS NOTED, NO POLLING WAS REQUESTED BY THE DEFENSE OR THE STATE. CONSIDERING THAT AT THE TIME OF TRIAL - IN AUGUST OF 2019 - LOUISIANA LAW ACCEPTED NON-UNANIMOUS JURY VERDICTS FOR OFFENSES WHICH PREDATED JAN. 1, 2019, IT IS NOT BEYOND REASON THAT NO OBJECTION OR FURTHER INQUIRY INTO THE VERDICT WAS PERFORMED. ARMED WITH THIS PORTION OF THE RECORD, THE COURT STATED THAT THE QUESTION AS TO WHETHER THE VERDICTS CONVICTING DEFENDANT WERE UNANIMOUS REMAINS UNRESOLVED... WE KNOW ONLY THAT AT LEAST TEN OF THE TWELVE JURORS AGREED. THIS MEANS THAT THE JURY VOTES CONVICTING DEFENDANT COULD HAVE BEEN 10-2; 11-1; OR 12-0. HOW IS IT THAT A FEW PARAGRAPHS LATER THE COURT KNOWS BEYOND A SHADOW OF A DOUBT THAT THE JURY'S VOTE WAS 12-0?

THE COURT LOOKED TO RECONCILE ITS LATER CERTAINTY IN THE JURY'S VOTE BY USING AN EARLIER CASE IT DECIDED WHERE THE TRIAL COURT DETERMINED THAT BOTH COUNSEL FOR THE DEFENSE AND THE PROSECUTION CONFIRMED THE VERDICT IN THAT CASE TO BE 10-2. STATE V. FORTUNE, 19-0368 (LA. APP. 4 (12/18/20)), 310 SO.3D 604. THE REASON THIS INFORMATION WAS AVAILABLE IN THE RECORD WAS BECAUSE THE STATE INDICATED THAT THE TWO DISSENTING VOTES WERE IN SUPPORT OF A GUILTY AS CHARGED VERDICT OF SECOND-DEGREE MURDER AS OPPOSED TO VOTES IN SUPPORT OF NOT GUILTY. FORTUNE, 310 SO.3D @ 579. THE TRIAL COURT, IN ROBINSON'S CASE, PROVIDED NO EVIDENCE THAT THE APPELLATE COURT REQUIRED OF IT SOUGHT CONFIRMATION FROM EITHER THE DEFENSE OR THE STATE CONCERNING THE VERDICT COUNT.

IN JUDGE ATKINS' DISSENT, THE PERPLEXING ORDER AND REASONING OF THE COURT WERE ADDRESSED. THE DISSENT STATED:

AS NOTED BY THE MAJORITY, OUR REVIEW OF THE RECORD AND THE DISTRICT COURT'S PER CURIAM REVEALS THAT THE QUESTION AS TO WHETHER THE VERDICTS CONVICTING DEFENDANT WERE UNANIMOUS REMAINS UNRESOLVED. NO POLLING OF THE JURY OCCURRED. BECAUSE THE PRESIDING DISTRICT JUDGE ASKED WHETHER AT LEAST TEN JURORS AGREED TO THE VERDICTS AND THE JURY FOREPERSON ANSWERED

REASONS FOR GRANTING THE PETITION (CONT...)

AFFIRMATIVELY, WE KNOW ONLY THAT AT LEAST TEN OF THE TWELVE JURORS AGREED. THIS MEANS THAT THE JURY VOTES CONVICTING DEFENDANT COULD HAVE BEEN 10-2) 11-1; OR 12-0. RAMOS MANDATES A UNANIMOUS JURY VERDICT FOR FELONY CONVICTIONS, AND MY REVIEW OF THE RECORD DOES NOT AFFIRMATIVELY ESTABLISH THAT THE VERDICTS WERE UNANIMOUS. . . . TO SATISFY BASIL FUNDAMENTAL FAIRNESS, THE RECORD MUST AFFIRMATIVELY INDICATE UNANIMITY AND NOTHING ELSE, UNLIKE THE RECORD BEFORE US THAT INDICATES THREE POSSIBILITIES FOR VERDICTS IN THIS MATTER. (SEE APP.C, * 6) (ATKINS, J., CONCURS IN PART AND DISSENTS IN PART WITH REASONS).

ADDITIONALLY, JUDGE ATKINS ADDRESSED THE FAR REACHING IMPLICATIONS OF SUCH A DECISION BY THE COURT BY STATING, "THIS IS A CASE OF FIRST IMPRESSION IN THIS COURT WHERE THE UNANIMITY OF JURORS CANNOT BE DETERMINED UPON REMAND TO THE DISTRICT COURT. ALLOWING THIS COURT TO SET ASIDE THE UNANIMITY REQUIREMENT WOULD OPEN THE DOOR TO ALLOWING ADDITIONAL, SERIOUS VIOLATIONS OF THE CONSTITUTIONAL RIGHTS OF FUTURE RAMOS APPELLANTS WHEN THE RECORD IS SIMILARLY UNCLEAR." ID.

A SIMILAR CASE AROSE IN STATE V. NORMAN, 18-723 (LA. APP. 5 CIR. 12/18/19), 297 So. 3D 713, 786-87. PERMAINE NORMAN'S COUNSEL REQUESTED THAT THE JURY BE POLLED IN HIS CASE. THE DISTRICT COURT CEASED POLLING THE JURY AFTER THE FIRST TEN JURORS. BECAUSE NORMAN'S OFFENSE WAS COMMITTED ON JUNE 17, 2011, THE VERSIONS OF THE LAW AT THE TIME OF THE OFFENSE WERE APPLICABLE. THE LOUISIANA SUPREME COURT GRANTED NORMAN'S WRIT APPLICATION AND REMANDED THE CASE BACK TO HAVE THE TRIAL COURT CONDUCT FURTHER PROCEEDINGS TO ASCERTAIN WHETHER THE VERDICT WAS UNANIMOUS. CHIEF JUSTICE JOHNSON DISSENTED FROM THE PER CURIAM ARGUING THAT:

I WOULD GRANT AND REMAND FOR A NEW TRIAL, PURSUANT TO RAMOS V. LOUISIANA, — U.S. —, 140 S. CT. 1390, 206 L. ED. 2D 583 (2020). [A] PROCESS THAT ASKS ANY OF THE JURORS TO RECALL THEIR VOTE (OR THE VOTES OF OTHERS) WILL BE RELYING ON MEMORIES NECESSARILY TAINTED BY SUBSEQUENT EVENTS AND WE CAN HAVE NO CONFIDENCE THAT IT WILL PRODUCE AN ACCURATE RESULT. . . . WE CAN HAVE NO CONFIDENCE IN THE RESULT OF AN INQUIRY INTO INDIVIDUAL JUROR'S VOTES ALMOST FOUR YEARS AFTER TRIAL. THEREFORE I DISSENT FROM THE MAJORITY'S RECOMMENDED PROCESS TO RESOLVE THE ISSUE AND WOULD SIMPLY REMAND FOR A NEW TRIAL.

STATE V. NORMAN, 2020-00109 (LA 7/2/20), 297 So. 3D 738 (JOHNSON, C.J. DISSENTS AND ASSIGNS REASONS).

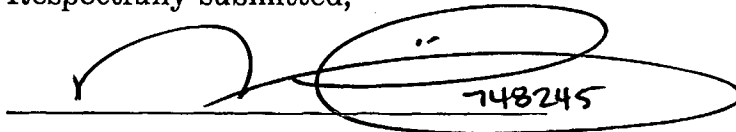
ALTHOUGH ROBINSON DID NOT POLL THE JURY, EVIDENCE EXISTED OF A JURY COUNT WHICH REVEALED TEN JURORS AGREED WITH THE VERDICT. BECAUSE THE VOTES OF THE FINAL TWO JURORS COULD NOT BE DETERMINED, PROTECTION OF ROBINSON'S RIGHT TO UNANIMITY MUST BE PROTECTED THROUGH THE GRANTING OF A NEW TRIAL.

THE LOUISIANA COURT OF APPEAL AND THE LOUISIANA SUPREME COURT DECIDED TO THE CONTRARY DIRECTLY CONFLICTING WITH THIS COURT'S DECISION IN RAMOS V. LOUISIANA. THIS COURT ANSWERED THE QUESTION OF WHETHER A UNANIMOUS JURY IS REQUIRED TO CONVICT UNDER THE SIXTH AND FOURTEENTH AMENDMENTS WITH A RESOUNDING YES. INTERVENTION FROM THIS HONORABLE COURT IS NEEDED TO PROTECT ROBINSON'S RIGHTS.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,


748245

Date: MARCH 23, 2024