

No. 19-250

IN THE SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 2019

THE STATE OF OKLAHOMA,

Petitioner,

vs.

JESSE ALLEN JOHNSON,

Respondent.

BRIEF IN OPPOSITION TO
PETITION FOR WRIT OF CERTIORARI

ANDREA DIGILIO MILLER, OBA No. 17019*
ATTORNEY AT LAW
800 N. Harvey, Suite 317
Oklahoma City, Oklahoma 73102
(405) 208-6161

*Counsel of Record
By Special Appointment of the
Oklahoma County Public Defender

ROBERT ALAN RAVITZ, OBA No. 7428
OKLAHOMA COUNTY PUBLIC DEFENDER
320 Robert S. Kerr Avenue, Suite 400
Oklahoma City, Oklahoma 73102
(405) 713-1550

COUNSEL FOR RESPONDENT

November 18, 2019

QUESTION PRESENTED

Can a state appellate court mandate jury re-sentencing for juveniles sentenced to life without parole in a jurisdiction that has jury sentencing conferred by statute without running afoul of *Apprendi v. New Jersey*?

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JURISDICTION

Petitioner Seeks a writ pursuant to this Court's certiorari jurisdiction under 28 U.S.C. § 1257(a). As explained more fully below, this Court lacks jurisdiction because the issue below was decided on adequate and independent state grounds. Additionally, the *Apprendi* issue raised in the Petition was not raised in the Oklahoma Court of Criminal Appeals, the court of last resort for criminal cases in Oklahoma, because the State of Oklahoma did not file a response.

CONSTITUTIONAL AND RELEVANT STATUTORY PROVISIONS

United States Constitution, Amendment VIII:

Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted.

Okla. Stat. tit. 22, § 926.1:

In all cases of a verdict of conviction for any offense against any of the laws of the State of Oklahoma, the jury may, and shall upon the request of the defendant assess and declare the punishment in their verdict within the limitations fixed by law, and the court shall render a judgment, according to such verdict, except as hereinafter provided.

Okla. Stat. tit. 22, § 929:

A. Upon any appeal of a conviction by the defendant in a noncapital criminal case, the appellate court, if it finds prejudicial error in the sentencing proceeding only, may set aside the sentence rendered and remand the case to the trial court in the jurisdiction in which the defendant was originally sentenced for resentencing. No error in the sentencing proceeding shall result in the reversal of the conviction in a criminal case unless the error directly affected the determination of guilt.

B. When a criminal case is remanded for vacation of a sentence, the court may:

1. Set the case for a nonjury sentencing proceeding; or

2. If the defendant or the prosecutor so requests in writing, impanel a new sentencing jury.

C. If a written request for a jury trial is filed within twenty (20) days of the date of the appellate court order, the trial court shall impanel a new jury for the purpose of a new sentencing proceeding.

1. All exhibits and a transcript of all testimony and other evidence properly admitted in the prior trial and sentencing shall be admissible in the new sentencing proceeding. Additional relevant evidence may be admitted including testimony of witnesses who testified at the previous trial.

2. The provisions of this section are procedural and shall apply retroactively to any defendant sentenced in this state.

D. This section shall not be construed to amend or be in conflict with the provisions of Section 701.10 or 701.10a of Title 21 of the Oklahoma Statutes relating to sentencing and resentencing in death penalty cases; Section 438 of this act relating to the trial procedure for defendants prosecuted for second or subsequent offense; or the provisions of Section 439 and 440 of this act relating to assessment of punishment in the original trial proceedings.

STATEMENT OF THE CASE

Seventeen (17) year old Jesse Allen Johnson, was charged by Information with one count of first degree murder and one count of conspiracy to commit a felony on October 7, 2005. He and his four (4) co-defendants were alleged to have killed the husband of one of the co-defendants in a murder for hire scheme.

On December 21, 2005, a preliminary hearing for Jesse Johnson was held. On March 3, 2006, a youthful offender hearing was held where the court determined that Mr. Johnson should be treated as an adult because of his age at the time of the hearing. Despite Mr. Johnson's age, borderline intelligence, lack of prior criminal behavior and amenability to rehabilitation, the court found that he was unable to complete a Youthful Offender Program in the time

required by Statute. The denial of Youthful Offender status was appealed to the Oklahoma Court of Criminal Appeals and on June 23, 2006. The Oklahoma Court of Criminal Appeals affirmed in a 3-2 vote. The Court denied Youthful Offender status based upon the Defendant's inability to complete a Youthful Offender Program under age requirements prescribed by law. (Resp. Appx. at 1) Due to his classification as an adult Mr. Johnson faced either a life sentence or a life without parole sentence if convicted.

Based upon the advice of his appointed attorney Mr. Johnson entered a blind plea of guilty on November 29, 2006. Blind plea sentencing was set for January 3, 2007 and a Pre-Sentence Investigation Report was ordered by the court. On that date, the court formally sentenced the Defendant to life without the possibility of parole on the murder count and ten (10) years to do, the statutory maximum, on the conspiracy count.¹

Following formal sentencing, Mr. Johnson timely filed a Motion To Withdraw Guilty Plea. Issues raised in that motion included Mr. Johnson's misunderstanding of the legal process and ineffective assistance of counsel at his plea hearing and sentencing because he was not told he could call witnesses in mitigation in his blind plea hearing. (Pet. Appx. at 21) A hearing on the motion to withdraw plea was held on January 18, 2007. The issue was taken up on appeal and the sentence was affirmed.

¹ By the time Mr. Johnson's life without parole sentence was remanded for new sentencing by the Oklahoma Court of Criminal Appeals he had discharged the ten (10) year sentence for conspiracy. Therefore, he currently remains in custody of the Oklahoma County Detention Center while the State of Oklahoma challenges the Oklahoma Court of Criminal Appeals' ruling.

After the Court's decision in *Montgomery v. Louisiana*, 136 U.S. 718, 193 L.Ed.2d 599 (2016), Mr. Johnson filed a *pro se* Application for Post-Conviction Relief on March 13, 2017 and was subsequently denied by the same district court judge who had previously sentenced him to life without parole on June 26, 2017. The Court of Criminal Appeals took the issue up on appeal and a mandate was issued where the Court of Criminal Appeals vacated and remanded Mr. Johnson's case for resentencing in accordance with the procedures set out in *Stevens v. State*, 2018 OK CR 11, 422 P.3d 741. (Pet. Appx. at 1)

Following remand, the district court held a status conference on June 25, 2018. The matter was reset and ultimately held on October 4, 2018. In the interim, counsel for Mr. Johnson filed a motion entitled "Defendant's Request For Jury Trial Pursuant to 22 O.S. § 929." (Resp. Appx 1) The State filed its "Response & Objection To Defendant's Request For Jury Trial Pursuant To 22 O.S. § 929." (Resp Appx at 8) On October 18, 2018 the district court judge denied Mr. Johnson's request for jury re-sentencing.

Mr. Johnson petitioned the Oklahoma Court of Criminal Appeals for an extraordinary writ on November 29, 2018. Without response from the district court or the State of Oklahoma the state appellate court granted the writ and remanded the case to the district court for a determination of how to proceed under Okla. Stat. tit. 22, § 929; the state statutory provision that confers upon Mr. Johnson the right to resentencing before a jury. Specifically, the Oklahoma Court of Criminal Appeals ordered:

The trial court's denial of Petitioner's request for jury trial resentencing based upon waiver is VACATED, and this matter is REMANDED to the trial court for a decision using his discretion under the directives of *Stevens v. State*, 2018 OK CR 11, ¶¶ 38-39, 422 P.3d 741, 750-751, in determining which resentencing procedure pursuant to Section 929 of Title 22 is appropriate. Petitioner's pleas of guilty and convictions remain constitutionally valid.

Johnson v. Elliott, 2019 OK CR 9, ¶ 11, ___ P.3d. ___, (Pet. Appx. at 5) Before the district court had the opportunity to determine "which resentencing procedure" is appropriate pursuant to Okla. Stat. tit. 22, § 929, the State of Oklahoma sought certiorari review herein.

REASONS FOR DENYING THE WRIT

As an initial matter it is important to point out what the State of Oklahoma is not challenging in this case. The State does not challenge that the Eighth Amendment rule set forth in *Graham v. Florida*,² *Miller v. Alabama*,³ and *Montgomery*, applies to the State of Oklahoma's sentencing scheme in first degree murder cases involving juvenile offenders.⁴ Additionally, the State does not challenge the underpinnings of those cases; that a sentencer must consider the attendant circumstances of youth in an individualized sentencing proceeding before sentencing a juvenile offender to life without parole. Finally, and significant to the facts presented in this case, the State does not challenge the Oklahoma Court of Criminal Appeals holding that Mr. Johnson, and other

² 560 U.S. 48, 130 S.Ct. 2011, 176 L.Ed.2d 825 (2011).

³ 567 U.S. 460, 132 S.Ct. 2455, 183 L.Ed.2d 407 (2012).

⁴ In *Luna v. State*, 2016 OK CR 27, ¶¶ 14-16, 387 P.3d 956, 961-962, the Oklahoma Court of Criminal Appeals held that, despite the fact that juvenile life without parole sentences are not mandatory in Oklahoma, all juvenile life without parole sentences that pre-dated *Graham* and *Miller* violated the Eighth Amendment because the sentencer would not have considered the attendant characteristic of youth and made a determination that the juvenile was irreparably corrupt before imposing sentence.

similarly situated defendants who pled guilty prior to *Graham* and *Miller*, did not waive his right to an individual sentencing proceeding before a jury because he could not have known he was entitled to such an individualized determination at the time of his plea in 2006. The State seeks review solely on the issue of whether the individual determination that a juvenile offender is deserving of life without parole must be made by a jury and beyond a reasonable doubt under *Apprendi v. New Jersey*, 530 U.S. 466, 120 S.Ct. 2348, 147 L.Ed.2d 435 (2000).

While that is a question the Court will no doubt have the opportunity to decide one day, this case does not present the vehicle to decide that issue. First, the Oklahoma Court of Criminal Appeals' decision to remand Mr. Johnson's case for a jury resentencing is based on an adequate and independent state ground. Second, the *Apprendi* issue was neither squarely raised before the court of last resort nor decided by the court. Finally, the jurisdictional split alleged by Petitioner does not exist.

- 1. This Court should deny certiorari review because the Oklahoma Court of Criminal Appeals' opinion granting Mr. Johnson a resentencing proceeding before a jury is based on independent and adequate state law grounds.**

When the *Montgomery* Court ruled that the substantive Eighth Amendment holding of *Miller v. Alabama* was a new rule applicable to juvenile defendants retroactively, the Oklahoma Court of Criminal Appeals took that mandate seriously and subsequently implemented procedures, pursuant to state statutory law, to guarantee that juveniles sentenced to life without parole

sentences could not be re-sentenced to life without parole without the sentencer considering the attendant circumstances of youth in determining the appropriate and proportionate sentence.⁵ While the procedure implemented by the Oklahoma Court of Criminal Appeals might confer more protection than *Miller* and *Montgomery* require, the state court is free to do so when it is wholly based on state law and not federal law. This is a valid exercise of the sovereign administration of state criminal justice systems that serves as the cornerstone of our federal system. *See generally Burgett v. Texas*, 389 U.S. 109, 113-14, 88 S. Ct. 258, 261, 19 L. Ed. 2d 319 (1967) (“The States are free to provide such procedures as they choose...provided that none of them infringes a guarantee in the Federal Constitution.”)

Oklahoma has jury sentencing in all cases unless the right to jury sentencing is waived.⁶ *See Livingston v. State*, 1990 OK CR 40, ¶¶ 9, 18, 795 P.2d 1055, 1058-1059 (Acknowledging Oklahoma’s statutory right to jury sentencing). This state statutory right to jury sentencing girds the Oklahoma Court of Criminal Appeals insistence that when juvenile life without parole sentences are vacated on post-conviction pursuant to *Montgomery*, the

⁵ Petitioner asserts that “This Court made clear in *Montgomery* that no formal findings of fact are required by *Miller* before a juvenile homicide offender may be sentenced to life without parole” citing *Montgomery*, 136 S.Ct. at 734-735. (Pet. at 5) However, the Court has made clear that a juvenile offender cannot be sentenced to life without parole without an individualized sentencing proceeding as required in capital cases where “youth and its attendant circumstances” are considered. *Miller*, 567 U.S. at 475-476, 132 S.Ct. at 2467. From that individualized sentencing proceeding there must be a determination that the juvenile is “irreparably corrupt.” *Miller*, 132 S.Ct. at 479-480, 132 S.Ct. at 2469.

⁶ This facet of Oklahoma statutory law is not explicitly addressed by Petitioner in the petition. In fact, Okla. Stat. tit. 22, §§ 926.1 and 929 are not referenced in the State’s petition except for an acknowledgement that the basis of the Oklahoma Court of Criminal Appeals remand was § 929. (Pet. at 17-18)

defendants retain the right to jury sentencing. See *Luna* at ¶ 18, 387 P.3d at 691-962. Moreover, the court held, and rightly so, that when juveniles who waived jury trial prior to the decision in *Miller* could not have validly waived the right to have a jury determination of the findings required by *Miller*, since that right did not exist at the time of the waiver. *Johnson* at ¶ 10. That holding is perfectly consistent with the idea that one cannot validly waive a right of which one is unaware, even if that right is conferred by statute.

This state statutory right to jury re-sentencing takes Oklahoma out of the mainstream of jurisdictions in the United States distinguishing it from the vast majority of states that leave sentencing to the court. For that reason, the fact that *Graham* and *Miller* speak in terms of judge sentencing does not foreclose a state like Oklahoma, with jury sentencing and re-sentencing, from creating a state jury trial procedure to make the determinations necessary to sentence a juvenile offender to life without parole.

To that end, the Oklahoma Court of Criminal Appeals remanded Mr. Johnson's case under Okla. Stat. tit. 22, § 929 for the district court to make a determination of the proper way to proceed making it clear to the district court that Mr. Johnson's waiver of jury trial in 2006 did not waive his opportunity for a jury to make the necessary determination under *Miller*. (Pet. App. at 5) The Order cites to *Stevens v. State*, 2018 OK CR 11, ¶¶ 38-39, 422 P.3d 741, 750-751,⁷ as that is the precedential case for the procedure to be used in cases like

⁷ Petitioner candidly acknowledges that the discussion of *Apprendi* in *Stevens* is mere dicta. (Pet. at 9) Respondent submits that the reference in the court's order to *Stevens* relates to the procedural rules set forth in that opinion and not on the reference to *Apprendi* in dicta.

Mr. Johnson's where the conviction remains intact but a resentencing is necessary under *Miller* and *Montgomery*. To hold otherwise would violate Okla. Stat. tit. 22, § 929 and *Hicks v. Oklahoma*, 477 U.S. 343 (1980)(Recognizing a due process interest in application of a state statute under the Fourteenth Amendment.)⁸

Petitioner bears the burden of proving that this Court has jurisdiction. *Durley v. Mayo*, 351 U.S. 277, 285, 76 S.Ct. 806, 811, 100 L.Ed.2d 1178 (1956). Rule 10 of the *Rules of the Supreme Court of the United States* expressly states that "Review on a writ of certiorari is not a matter of right, but of judicial discretion." This Court has expressly held that jurisdiction does not lie in state cases that are decided on adequate and independent state law grounds. *Michigan v. Long*, 463 U.S. 1032, 1040-1041, 103 S.Ct. 3469, 3478, 77 L.Ed.2d 1201 (1983). The cornerstone for the rule lies in the Court's respect for the independence of state courts and avoidance of rendering advisory opinions. *Id.* The rule reflects more than a practice by the Court but rather a jurisdictional limit on the Court's power. *Herb v. Pitcarin*, 324 U.S. 117, 125, 65 S.Ct. 459, 463, 89 L.Ed. 789 (1945). This rule applies whether the state law ground is substantive or procedural. See, e.g., *Fox Film Corp. v. Muller*, 296 U.S. 207, 210, 56 S.Ct. 183, 184, 80 L.Ed. 158 (1935); *Herndon v. Georgia*, 295 U.S. 441, 55 S.Ct. 794, 79 L.Ed. 1530 (1935).

⁸ Even one of the dissenters to Mr. Johnson's writ order acknowledged the state statutory right to jury sentencing and the application of *Hicks* in conferring a due process interest in application of the state statute. (Pet. Appx. at 11)

Even *if* the Oklahoma Court of Criminal Appeals' order in this case was based in part on *Apprendi* (which it isn't) and even *if* this Court ruled that *Apprendi* is inapplicable, Mr. Johnson would still have a state statutory right to jury re-sentencing. The State of Oklahoma has not challenged the Oklahoma Court of Criminal Appeals' conclusion that his pre-*Miller* waiver of jury trial could waive his statutory right to a post-*Miller* jury sentencing. As such, reversal by this Court would have no impact on what Mr. Johnson is entitled to under the state re-sentencing statute. It would, therefore, be an advisory opinion. *Cf. Kansas v. Marsh*, 548 U.S. 163 (2006).

2. Certiorari should be denied because the *Apprendi* issue was raised in the district court but not fairly presented in the court of last resort because the State of Oklahoma did not file a response to Respondent's petition for extraordinary relief.

When Mr. Johnson filed his petition for extraordinary relief under Rule 10, *Rules of the Oklahoma Court of Criminal Appeals*, Okla. Stat. tit. 22, Ch. 18, App., the case was submitted and considered by the Court without the Court ordering a response from the respondent (the district court judge) or the State of Oklahoma as the real party in interest. Specifically, Rule 10.4 (A) states in pertinent part, "Oral argument and/or a response **may be ordered** by this Court." (emphasis added) Based on the court's previous rulings in juvenile life without parole cases, the court issued an order relying on state statutory provisions. The application for extraordinary relief was entitled "Application for Court To Assume Original Jurisdiction and Petition For Writ of Prohibition And/Or Mandamus To Prohibit Respondent From Sentencing The Petitioner

Without Empaneling A Jury Pursuant To 22 O.S. 2011 § 929 and *Stevens v. State.*” (Resp. App. at 29) The brief in support of the application did not cite to *Apprendi* much less argue that Mr. Johnson’s right to jury resentencing was based on the principal articulated in *Apprendi*. Instead, Respondent, as in the district court, argued that Mr. Johnson was entitled to jury resentencing under the state statutory provision and the procedure set out in *Stevens*. (Resp. Appx. at 35) The rules of the Oklahoma Court of Criminal Appeals do not prohibit filing a response and at no time did the State of Oklahoma move for leave to file a response and raise the *Apprendi* issue. Following the issuance of the order the State could have sought re-hearing arguing the Court failed to consider to raise an issue raised in the district court. It did not do so.

This Court will not review a state court decision where the federal issue was not fairly presented to the state court of last resort. In *Mellon v. O’Neil*, 275 U.S. 212, 214–15, 48 S. Ct. 62, 63, 72 L. Ed. 245 (1927) the Court stated:

It has long been settled that this Court acquires no jurisdiction to review the judgment of a state court of last resort on writ of error, unless it affirmatively appears upon the face of the record that a federal question constituting an appropriate ground for such review was presented in and expressly or necessarily decided by such state court. It is not enough that there may be somewhere hidden in the record a question which if it had been raised would have been of a federal nature. (citations omitted)

This rule addressed the pragmatic concern that if the issue was not decided by the lower court then there will not be an adequate record on which to decide the issue here. *Cardinale v. Louisiana*, 394 U.S. 437, 439, 89 S.Ct. 1161, 1163, 22 L.Ed.2d 398 (1969).

Here, the State argued that *Apprendi* does not confer a right to jury resentencing in its written response to Mr. Johnson's request for jury trial in the district court. (Resp. Appx. at 8) At the October 18, 2018 hearing the State made the claim, among other arguments, that the *Stevens* Court based its decision on dicta in *Apprendi*.⁹ (10-18-18 Tr. 6) The district court's ruling merely states that the State's "position is accurate" and denied the request for a jury re-sentencing made pursuant to the state statute. As stated above, the issue was not raised in the Oklahoma Court of Criminal Appeals and the extraordinary writ order is silent on the application of *Apprendi*. There is no record or written decision for this Court to decide this federal constitutional issue.

3. This Court should deny certiorari review because Petitioner has failed to establish a serious disagreement between state courts of last resort or federal circuit courts relating to this issue.

The State of Oklahoma argues that the decision below "solidifies a direct conflict among the state courts of last resort over whether a juvenile homicide offender has a Sixth Amendment right to jury factfinding before a life-without parole sentence may be imposed." (Pet. at 11) In support of the alleged "direct conflict" the State primarily relies on decisions from three (3) states—Michigan, Pennsylvania and Utah. A closer look at these jurisdictions reveals that there is no significant split on the question presented in the petition. Even more fundamentally the Oklahoma Court of Criminal Appeals has not held that depriving a juvenile offender in Oklahoma of jury sentencing would violate

⁹ However, the argument of the parties during that hearing were brief because both sides stood on what they had filed in the motion and response.

Apprendi. Petitioner readily admits that the reference to *Apprendi* in *Stevens* was dicta. (Pet. at 9) Further, Petitioner acknowledges that the *Apprendi* issue was not raised by either party in *Stevens*. Because the *Stevens* Court's reference to *Apprendi* is only dicta, and because it did not address *Apprendi* in Respondent's order, the Oklahoma Court of Criminal Appeals cannot be said to have ruled on the issue so that it is not in conflict with any other state court. Beyond that, any ruling by a state court rejecting the *Apprendi* argument cannot be in conflict with the procedure implemented by the Oklahoma Court of Criminal Appeals if that state does not have jury sentencing conferred by statute. Respondent submits that none of the state court holdings from courts of last resort cited by Petitioner create a conflict requiring resolution by this Court because the sentencing scheme of those states do not include jury sentencing like Oklahoma has via state statute.

In *People v. Skinner*, 917 N.W.2d 292, 304-305 (Mich. 2018) the Michigan Supreme Court rejected a challenge to MI ST § 769.25 enacted in response to *Miller* that allowed a judge to consider the factors set forth in *Miller* in assessing punishment for juvenile offenders facing life without parole. While it is true the Michigan Supreme Court rejected the *Apprendi* challenge to the statute, it cannot be found to be in direct conflict as this case because Michigan is a judge sentencing state with sentencing guidelines. See MI ST 769.34. If the Michigan Supreme Court struck down the statute as unconstitutional under *Apprendi* it would have carved out an exception to Michigan's felony sentencing procedure. As such the impact would have been

very different in Michigan than in Oklahoma where the state appellate court's ruling merely confers the same right to jury sentencing to juvenile offenders as to all other criminal offenders in the state.

Likewise, in *Commonwealth v. Batts*, 163 A.3d 410, 447-450, 456-457 (Pa. 2017) the Pennsylvania Supreme Court ruled that the state statute enacted by the Pennsylvania Legislature in response to *Graham* and *Miller* setting forth the sentencing range for juvenile offenders charged with first degree murder did not violate *Apprendi* by allowing the judge rather than a jury to sentence the offender. See PA ST 18 Pa.C.S.A. § 1102.1. Again, Pennsylvania has judge sentencing rather than jury sentencing. *Commonwealth v. Gordon*, 942 A.2d 174, 182 (Pa. 2007)(Pennsylvania judges retain broad discretion to sentence up to and including the maximum sentence authorized by statute; "the only line that a sentence may not cross is the statutory maximum sentence.")(citation omitted).

The only other case from a state court of last resort cited by Petitioner as supporting the assertion of a conflict amongst court of last resort is Utah. Petitioner cites *State v. Houston*, 353 P.3d 55, 68 (Utah 2015) *cert. denied*, 136 S.Ct. 2005 (2016). However, Petitioner also acknowledges that following the decision in *Houston* the Utah legislature banned life without parole sentences for juvenile offenders. (Pet. at 13, n. 5) Therefore, reliance on that case to weigh in favor of a conflict in state court decisions is misplaced. Likewise, Petitioner includes in the discussion about conflict in state court decisions several intermediate courts of appeal decisions. However, under Rule 10(b)

this Court looks to decisions of court of last resort not intermediate appellate court decisions to determine whether a significant conflict exists requiring this Court's attention. Therefore, further attention to those cases is unnecessary.

Petitioner has failed to show a significant conflict between Oklahoma, a state with jury sentencing conferred by state statute, and other states with similar sentencing schemes. While there are certainly state court decisions rejecting the Sixth Amendment jury sentencing claim under *Apprendi* in the juvenile life without parole context, the Oklahoma Court of Criminal Appeals has not decided that issue. Even if it ultimately rejects the Sixth Amendment argument when the issue is properly presented to it, juvenile offenders in Oklahoma facing a potential life without parole sentence will still be entitled to jury sentencing as conferred by state statute. As such, the imagined conflict in jurisdictions raised by Petitioner simply has no practical impact on Oklahoma.

CONCLUSION

Respondent prays the Court deny the State of Oklahoma's petition because the opinion of the state court below relies on adequate and independent state grounds and because the State of Oklahoma has failed to show a meaningful split in jurisdictions in relation to the question presented.

Respectfully submitted,

By: 

ANDREA DIGILIO MILLER, (OBA # 17019)
By Special Appointment by the
Oklahoma County Public Defender's Office
800 N. Harvey Ave, Suite 317
Oklahoma City, Oklahoma 73102
(405) 208-6161
admiller@okcu.edu

ROBERT A. RAVITZ, (OBA #7428)
Public Defender of Oklahoma County
320 Robert S. Kerr, Suite 400
Oklahoma City, OK 73102
(405) 713-1550
robert.ravitz@oscn.net

ATTORNEYS FOR RESPONDENT

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CERTIFICATE OF SERVICE

I, Andrea Digilio Miller, member of the bar of this Court, do hereby certify that I have served a copy of the Brief In Opposition To Petition For Writ of Certiorari by hand delivery to Assistant District Attorney Jennifer Hinsperger, counsel of record for Petitioner, this 18th day of November, 2019.



ANDREA DIGILIO MILLER