No. 24-5381

IN THE

Supreme Court of the United States

NATHAN COOPER,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

REPLY BRIEF FOR PETITIONER

HECTOR A. DOPICO
FEDERAL PUBLIC DEFENDER
ANDREW L. ADLER
Counsel of Record
ASHLEY D. KAY
ASS'T FED. PUBLIC DEFENDERS
1 E. Broward Blvd., Ste. 1100
Ft. Lauderdale, FL 33301
(954) 356-7436
Andrew_Adler@fd.org

Counsel for Petitioner

December 3rd, 2024

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Other Authorities

REPLY BRIEF FOR PETITIONER

In *Terry v. Ohio*, 392 U.S. 1 (1968), the Court authorized the police to pat down a person's body even when there is no probable cause to arrest. As Justice Scalia later explained, and as scholars have since confirmed, that invasive practice is historically bankrupt. Nobody has identified any framing-era precedent justifying these "frisks." That is because the *Terry* Court invented this authority as a matter of pure policy.

Remarkably, the government does not dispute any of that. It does not identify any historical support for *Terry*'s frisk holding. And it does not deny that the *Terry* Court engaged in judicial policymaking. To the contrary, the government is able to defend the frisk holding only by engaging in the same policy analysis as *Terry* itself.

But that is not how constitutional law works—not anymore. Original meaning is now paramount; policy is for legislatures. Last Term, one Justice urged litigants to "[c]ome to this Court with arguments from text and history." *United States v. Rahimi*, 144 S. Ct. 1889, 1909 (2024) (Gorsuch, J., concurring). Petitioner has done just that.

Despite his compelling originalist challenge, the government brushes it aside. Other than *endorsing Terry*'s ahistorical analysis, the government offers a superficial *stare decisis* discussion and an illusory vehicle problem. That is the entire opposition.

The government's dismissive response is designed to downplay the importance of this case. But the Framers would be horrified by *Terry* frisks. Yet they occur every single day. And they disproportionally affect racial minorities. Reconsidering *Terry* may not be a top priority for the powers that be. But originalism must be applied with an even hand if that methodology is to continue to flourish. *See* Cato Br. 10–11.

I. *Terry* frisks contravene the Fourth Amendment.

Terry's frisk holding is contrary to the Fourth Amendment's original meaning.

1. A search incident to arrest was the established method at common law to physically search a person without a warrant, and such searches could occur only if there was "probable cause" to arrest. *See* Pet. 8–9. This Court has accordingly recognized that the "requirement of probable cause has roots that are deep in our history," *Henry v. United States*, 361 U.S. 98, 100 (1959), and probable cause is of "central importance . . . to the protection of a citizen's privacy afforded by the Fourth Amendment's guarantees," *Dunaway v. New York*, 442 U.S. 200, 213 (1979). Nonetheless, and as the Court has also recognized, "*Terry* departed from traditional Fourth Amendment analysis" by "recogniz[ing] an exception to the requirement" that searches and seizures "of persons must be based on probable cause." *Id*. at 208–10.

The *Terry* Court made no effort to ground this newfound exception in history. As Justice Scalia later explained, the *Terry* Court employed an "original-meaning-is-irrelevant, good-policy-is-constitutional-law school jurisprudence," because it "made no serious attempt to determine compliance with traditional standards, but rather, according to the style of this Court at the time, simply adjudged" that frisks were "'reasonable' by current estimations." *Minnesota v. Dickerson*, 508 U.S. 366, 380, 382 (1993) (Scalia, J., concurring). That methodology is clear from the face of the opinion.

As petitioner explained, *Terry* mentioned history only to reject it. *See* Pet. 10, 24–26. It disagreed "that the authority of the police must be strictly circumscribed by the law of arrest and search as it has developed to date in the traditional

jurisprudence of the Fourth Amendment." 392 U.S. at 11. Instead, the *Terry* Court determined that there was "no ready test for determining reasonableness other than by balancing the need to search . . . against the invasion which the search . . . entails." *Id*. at 21 (quotation omitted). The *Terry* Court then proceeded to balance those policy interests for itself based on its own views of what was "reasonable." *See id*. at 22–27.

2. The government now makes no effort to defend the *Terry* opinion on historical grounds. Nor does the government deny that the *Terry* Court engaged in policymaking rather originalism. Nonetheless, the government at the same time asserts that petitioner cites "no authority" demonstrating that *Terry*'s frisk holding is inconsistent with the Fourth Amendment's original meaning. BIO 4. But petitioner did precisely that. He cited numerous authorities supporting his argument, including Justice Scalia's concurrence in *Dickerson* and academic scholarship. *See* Pet. 11–14.

Justice Scalia—a history buff—specifically researched whether someone at the Founding could be searched absent probable cause to arrest. And he was unable to locate "any precedent" for such a search; there was "no clear support at common law." *Dickerson*, 508 U.S. at 381 (Scalia, J., concurring) (citing authorities). The government ignores this central thesis of his concurrence. *See* BIO 5. Instead, it selectively quotes one sentence, where he speculated that "perhaps" others "might" deem *Terry* frisks "reasonable" based on "technological changes" in society. *Dickerson*, 508 U.S. at 382 (Scalia, J., concurring). But the government omits that Justice Scalia then clarified that he would instead "adhere to the original meaning." *Id*. And while Justice Scalia stopped short of definitively opining that *Terry*'s "result was wrong,"

he presumably hedged on that only because, as he explained in the very next sentence, that issue "was neither challenged nor argued" in that case. *Id*. It is here.

Meanwhile, "subsequent scholarship" has only "validate[d] Justice Scalia's view" that *Terry*'s frisk holding "could not be justified on originalist grounds." *United States v. Johnson*, 921 F.3d 991, 1009–10 & n.1 (11th Cir. 2019) (en banc) (Jordan, J., dissenting) (citing authorities). Petitioner cited several articles concluding that there is no framing-era precedent for searching someone without probable cause to arrest them. Pet. 13–14. Notably, the government does not dispute this scholarly consensus.

To the contrary, the government itself relies on the Rosenthal article that petitioner cites. *See* BIO 5–6. But while that article defends *Terry* on policy grounds, it admits that "the leading framing-era sources consistently identify the authority of an official or private person acting without a warrant exclusively in terms of a power to arrest offenders, making no mention of any power of investigatory . . . frisk of the type authorized in *Terry*." Lawrence Rosenthal, Pragmatism, Originalism, Race, and the Case Against *Terry v. Ohio*, 43 Tex. Tech. L. Rev. 299, 330 & n.212 (2010) (citing Blackstone, Hale, and Hawkins). The article goes on: "As William Cuddihy concluded in his exhaustive analysis of the historical evidence, 'by 1789, body searches were derivatives of the arrest process, and Americans had little recent experience with personal searches apart from that process.'" *Id*. at 332 (quoting William J. Cuddihy, The Fourth Amendment: Origins and Original Meaning, 602–1791 752 (2009)).

In short, neither the government nor academic scholars dispute Justice Scalia's conclusion that, at the Founding, no authority permitted personal searches absent

probable cause to arrest. Notably, the government does not identify a single historical example otherwise. Thus, contrary to its suggestion, such searches were not merely "[un]common in 1791" (BIO 5); they were non-existent. And the absence of any such precedent or authority itself "is an undeniable argument against the[ir] legality." *Boyd v. United States*, 116 U.S. 616, 629 (1886) (quoting *Entick v. Carrington*, 95 Eng. Rep. 807 (K.B. 1765)). Indeed, because personal searches were authorized *only* if there were grounds to arrest, it follows that they were otherwise "prohibited." BIO 4.

3. Unable to claim that the *Terry* Court engaged in originalism rather than policymaking, and unable to identify any historical basis for its frisk holding, the government primarily argues that *Terry* frisks are "reasonable" based on the "realities of modern policing and firearm technology." BIO 5–7. It observes that, at the Founding, there were "fewer officer-citizen encounters that could lead to the kind of risks associated with modern-day investigative stops." BIO 6. And, it continues, "firearms in the founding era" did not pose "the same dangers from concealed weapons that confront today's officers." BIO 6. In effect, the government doubles down on *Terry*'s policy analysis because, in its view, officer "safety concerns . . . continue to have great force today." BIO 7. But that is the antithesis of originalism.

Sensing the problem, the government suggests, albeit only in passing, that the Fourth Amendment's original meaning depends on what is "reasonable" today. BIO 5. But that is completely backwards. Originalism "preserve[s] that degree of respect for the privacy of persons and the inviolability of their property that existed when the provision was adopted—even if a later, less virtuous age should become accustomed

to considering all sorts of intrusion 'reasonable.'" *Dickerson*, 508 U.S. at 380 (Scalia, J., concurring). The only support for the government's topsy-turvy view is an article by Professor Amar. But his attempt to justify *Terry* historically has been debunked as "incomplete and one-sided" and for "selectively deploy[ing] incomplete fragments of the historical record to advance a partisan thesis." Morgan Cloud, Searching Through History; Searching for History, 63 U. Chi. L. Rev. 1707, 1732–43 (1996).[1]

In the end, the government musters no historical support for *Terry*'s frisk holding. That is fatal under this Court's precedent. Where (as here) the history is clear, the analysis must not only begin there; it must end there as well. Thus, the

[1] *Accord* Danielle D'Onfro & Daniel Epps, The Fourth Amendment and General Law, 132 Yale L.J. 910, 942 (2023) ("historically inclined scholars have strongly disputed some of the historical foundations of . . . Amar's claims"); Nikolaus Williams, Note, The Supreme Court's Ahistorical Reasonableness Approach to the Fourth Amendment, 89 N.Y.U. L. Rev. 1522, 1524 (2014) (criticizing Amar and "conclud[ing] that there is no evidence the Amendment was originally understood as requiring that searches and seizures simply be 'reasonable'"); Rosenthal, *supra*, at 336–37 (agreeing with other scholars that the historical evidence upon which Professor Amar relies "for *Terry*'s regime of stop-and-frisk is doubtful"); David E. Steinberg, Restoring the Fourth Amendment: The Original Understanding Revisited, 33 Hastings Const. L.Q. 47, 69 n.139 (2005) (Amar's "contentions often seem at odds with the historical record," and a "number of Fourth Amendment scholars disagree with Amar's reading of Fourth Amendment history"); David E. Steinberg, An Original Misunderstanding: Akhil Amar and Fourth Amendment History, 42 San Diego L. Rev. 227, 229 (2005) ("This Article concludes that Professor Amar's account receives little support from historical sources."); Thomas Y. Davies, Recovering the Original Fourth Amendment, 98 Mich. L. Rev. 547, 579 (1999) ("Contrary to Amar's claims, framing-era common law never permitted a warrantless officer to justify an arrest or search according to any standard as loose or flexible as 'reasonableness'"); *id.* at 575 n.63 ("Amar is an engaging writer, but his treatment of text and history is often loose and uninformed.") (collecting "criticisms of Amar's Fourth Amendment claims"); Tracey Maclin, The Complexity of the Fourth Amendment: A Historical Review, 77 B.U. L. Rev. 925, 929 (1997) ("Amar provides an incomplete account of the Amendment's history," and "judges and lawyers should not rely on Amar's theories when interpreting" it).

Court may not proceed to the government's freewheeling "reasonableness" analysis. In that regard, the government ignores this Court's Fourth Amendment precedent making history—not policy—the constitutional lodestar. *See* Pet. 14–16. But the government's policy views about the proper balance between individual liberty and officer safety in the modern era cannot supplant the balance struck by the Framers.

II. The question presented is exceptionally important.

As explained, the question presented is exceptionally important. *See* Pet. 16–23. The government does not address petitioner's arguments at all. Nor does it acknowledge the supporting amicus briefs filed by a diverse group of stakeholders.

1. The government does not dispute that *Terry* frisks are ubiquitous. As explained, available data from just a few jurisdictions shows that officers conduct at least *hundreds of thousands* of *Terry* frisks every year. *See* Pet. 17–18. If *Terry* frisks are contrary to the Fourth Amendment, as petitioner has forcefully argued, then this pervasive police practice is violating the constitutional rights of Americans on a daily basis and on a massive scale. That possibility alone warrants the Court's review.

Relatedly, the question presented is also the subject of frequently recurring litigation. After all, *Terry* frisks routinely reveal incriminating evidence giving rise to state and federal prosecutions. As a result, *Terry* frisks are challenged in criminal courtrooms every day. As the government acknowledges, courts have applied *Terry* in "thousands of cases." BIO 8. This fact bolsters, not undermines, the need for review.

2. The government also makes no effort to dispute that *Terry* frisks disproportionately affect people of color. Nor could it: the data is overwhelming.

See Pet. 17–19. And petitioner has explained how these racial disparities engender enduring physical and psychological harm in a large swath of society. *See* Pet. 21–23.

Although these disturbing disparities and harms were a major theme of the petition, the government barely addresses them. BIO 8. It observes only that *Terry* itself acknowledged the problem and suggested that "it must be condemned by the judiciary." 392 U.S. at 14–15 & n.11. But the past five decades make clear that such optimism was misplaced. And the government identifies no basis to believe that the racial disparities will abate as long as *Terry*'s frisk authority remains firmly in place.

In that regard, petitioner refers the Court to the amicus brief submitted by Earl Sampson. He describes the egregious abuse and discrimination that he and other young African Americans suffered by police officers in the City of Miami Gardens. His account reads like it occurred during the height of segregation, but it happened just over a decade ago. *Terry* is what allowed that nightmare scenario to become a reality.

3. The government faults petitioner for failing to show that overruling *Terry*'s frisk holding—but not its stop holding—would reduce racial disparities. BIO 8. But this discounts the degradation experienced when officers publicly feel up a person's body. *See Terry*, 392 U.S. at 16–17 & n.13. And it is impossible to predict how eliminating *Terry*'s frisk authority would affect the racial makeup of *Terry* stops.

Regardless, petitioner is not asking this Court to reconsider *Terry*'s frisk holding for the purpose of reducing racial disparities in policing. Rather, he is doing so because, as Justice Scalia's concurrence in *Dickerson* reflects, *Terry*'s frisk holding in particular lacks any arguable basis in history or the common law. *See* Pet. 13. That

these unconstitutional frisks systematically and disproportionately affect people of color only exacerbates the need to reconsider that ahistorical holding. *See* Pet. 27–28.

If anything, petitioner's decision to cabin his challenge to *Terry*'s frisk holding makes this case more (not less) attractive. It ensures that a favorable decision would not engulf all of *Terry* and its progeny, properly accounting for *stare decisis*. And the practical impact of such a decision would be limited. Officers could still make stops. And while they could no longer search based on reasonable suspicion of being armed and dangerous, they could still search based on probable cause of criminal activity.

III. The *stare decisis* factors support the need for review.

Petitioner addressed the *stare decisis* factors at length. *See* Pet. 23–35. The government devotes just three pages to them. *See* BIO 7–9. That treatment is telling.

1. As petitioner has explained, *Terry*'s frisk holding was not just wrong; it was egregiously wrong. Disregarding history, *Terry* openly substituted the Court's own policy preferences for the views of the Framers. And it appears to have done so based on then-current events—*i.e.*, the tumult of the 1960s. *See* Pet. 8–14, 24–27.

But times have changed. Originalism has since emerged as the prevailing method of constitutional interpretation. And the Court has not hesitated to reconsider constitutional precedents that, like *Terry*, flagrantly substituted policy for history, including precedents in the area of criminal procedure. *See* Pet. 33 (citing three Sixth Amendment examples). Furthermore, the last five decades have shown that *Terry*'s frisk holding has exacerbated racial tensions in society between law enforcement and communities of color, fueling unrest as well as distrust. This destabilizing dynamic

makes it harder (not easier) for police officers to do their jobs. Meanwhile, studies have revealed low "hit rates" for weapons and contraband. *See* Pet. 21–23, 27–29.

Ignoring these "special justifications" for reconsidering *Terry*'s frisk holding, the government responds only that this holding has been "'settled' law for decades." BIO 7 (citation omitted). But this observation merely raises rather than resolves the *stare decisis* question. To the extent the government is suggesting that there is some temporal cut-off for reconsidering precedent, there is not. *See, e.g.*, *Erie R. Co. v. Tompkins*, 304 U.S. 64 (1938) (overruling *Swift v. Tyson*, 41 U.S. 1 (1842)). To the extent it is suggesting that *Terry* is too "embedded" in society (BIO 9), recent decisions overruling landmark precedents refute that too. *See, e.g.*, *Loper Bright Enterprises v. Raimondo*, 144 S. Ct. 2244 (2024); *Dobbs v. Jackson Women's Health Org.*, 597 U.S. 215 (2022). And to the extent the government is suggesting that racial considerations are insignificant here, that is also belied by this Court's precedent. *See, e.g.*, *Students for Fair Admission, Inc. v. President & Fellows of Harvard College*, 600 U.S. 181, 287 (2023) (Thomas, J., concurring) ("The Court's opinion rightly makes clear that *Grutter* is, for all intents and purposes, overruled."); *Trump v. Hawaii*, 585 U.S. 667, 710 (2018) (overruling *Korematsu v. United States*, 323 U.S. 214 (1944)); *Brown v. Board of Education*, 347 U.S. 483 (1954) (overruling *Plessy v. Ferguson*, 163 U.S. 537 (1896)).

2. As explained, *Terry*'s frisk holding has proven unworkable because it affords officers boundless discretion, all but guaranteeing its inconsistent application.

Doctrinally, the government does not dispute that *Terry*'s "reasonable suspicion" standard is amorphous. *See* Pet. 30. It responds only that the same is true

of "probable cause," since both are fact-specific. BIO 8. But there are two differences here. First, probable cause is rooted in history and written into the text of the Fourth Amendment itself, whereas *Terry* invented the concept of "reasonable suspicion." Second, probable cause requires officers to determine if someone has committed a crime, an objective criterion, whereas *Terry* requires officers to determine if someone is "armed and dangerous," subjective criteria prone to bias and abuse. *See* Pet. 30.

The government asserts that "courts have faithfully applied [*Terry*'s] standard in thousands of cases." BIO 8. But this only confirms that it is unworkable. Despite their best efforts, the lower courts have been unable to ensure clarity or consistency. Indeed, the lower courts still struggle with the most basic questions of application. For example, the government does not dispute that, even today, lower courts do not agree about what it means for someone to be "armed and dangerous." *See* Pet. 30–31.

On the ground, the inconsistency in application is reflected in the data. As explained, frisk rates per stop and frisk rates by race vary widely, and there are low "hit rates" for weapons/contraband. *See* Pet. 29–30. That is because officers can almost *always* justify a frisk. The government's only response is that *Terry* authorized a limited search for weapons. BIO 8. But the lower courts allow officers to frisk any time a suspect could potentially be carrying any item that might harm them, even if it is not actually a "weapon." *See* Pet. 31–32. This maximizes rather than constrains discretion. And the lower courts have even categorically authorized *Terry* frisks in situations where the person may *not* be armed and dangerous—*e.g.*, when someone is stopped for drug possession or is merely the companion of an arrestee. *See* Pet. 32.

Moreover, while the government points to advancements in firearm technology (BIO 6), it ignores advancements in firearm protection under the law. This Court has recognized a constitutional right to carry a handgun for self-defense outside the home. Pet. 31. And many States now have laws permitting people to carry firearms. *See* Amicus Br. of Gun Owners of America, et al. 22–24 ("21.8 million Americans have permits to carry, and more live in states that do not require permits"). Thus, under *Terry*, millions must now choose between their Fourth Amendment rights and their right to carry a gun. Forcing Americans to choose among their rights is not workable.

3. Finally, and most remarkably, the government does not identify a single reliance interest that might militate against reconsidering *Terry*'s frisk holding.

The only actors who have relied on that holding are police officers, but the government does not argue that this reliance interest qualifies for *stare decisis*. And for good reason: this Court has squarely rejected the argument that "consideration of police reliance interests" requires retaining an "unconstitutional police practice." *Arizona v. Gant*, 556 U.S. 332, 348–49 (2009). It is no wonder that the government completely glosses over *Gant*'s *stare decisis* analysis. Instead, it asserts that *Gant* does not support reconsidering *every* Fourth Amendment precedent. BIO 9. But petitioner is not arguing that it does. He is merely arguing that police reliance on an unconstitutional practice does not support forever retaining precedents like *Terry* that warrant reconsideration under the traditional *stare decisis* factors. *See* Pet. 3, 33–35. Otherwise, the Judiciary would be required to "approve routine constitutional violations" in perpetuity. *Gant*, 556 U.S. at 351. That implication would be untenable.

IV. This case is an ideal vehicle.

1. As explained, petitioner expressly preserved his argument in both the district court and the court of appeals. Thus, the government does not dispute that the *Terry* frisk question is cleanly presented for *de novo* review here. *See* Pet. 5–7, 35.

2. As explained, the question presented is also dispositive of this case. Petitioner's felon-in-possession conviction depends on the firearm found during the *Terry* frisk. And both the district court and the court of appeals upheld the frisk on the exclusive ground that there was reasonable suspicion that he was armed and dangerous; neither court found probable cause of any criminal activity. *See* Pet. 5–7, 36. As a result, petitioner's conviction would be vacated were the Court to overrule *Terry*'s frisk holding and conclude that such searches require probable cause to arrest.

3. Resisting this conclusion, the government asserts for the first time that petitioner's motion to suppress would fail even if he prevailed in this Court, since the exclusionary rule *itself* is contrary to the Fourth Amendment's original meaning. BIO 9–10. This conclusory vehicle objection is makeweight; it fails for many reasons.

a. The government's remedial argument is not properly before this Court. The government failed to raise it either in the district court or the court of appeals, and the lower courts did not address it. Because this Court is a "court of review, not of first view," *Cutter v. Wilkinson*, 544 U.S. 709, 718 n.7 (2005), that issue would be addressed in the first instance (if at all) on remand were petitioner to prevail here.[2]

[2] If the government (or a State) wishes to present this question to this Court, then it should preserve it in the lower courts, and then either petition for certiorari where

b. It is doubtful that the government could even raise this doubly forfeited argument on remand. The Eleventh Circuit has "repeatedly refused to excuse the government's forfeiture of arguments predicated on exceptions to the exclusionary rule." *United States v. Campbell*, 26 F.4th 860, 910–11 & n.10 (11th Cir. 2022) (en banc) (Newsom, J., dissenting) (citing cases). That authority would control this case.

c. Even if the government could somehow inject the argument on remand, that would still pose no barrier to review here. This Court routinely grants review on threshold legal issues notwithstanding unresolved arguments that could defeat relief on remand—including in Fourth Amendment cases like this one. *See, e.g.*, *Collins v. Virginia*, 584 U.S. 586, 601 (2018); *Byrd v. United States*, 584 U.S. 395, 411 (2018).

d. Although irrelevant here, the government's remedial argument relies solely on Justice Thomas's solo concurrence in *Collins*. BIO 9. But his point was that this Court may lack "authority to impose the exclusionary rule on the States." *Collins*, 584 U.S. at 609 (Thomas, J., concurring). That proposition would not support refusing to apply the exclusionary rule in this *federal* prosecution. And while Justice Thomas opined that the federal exclusionary rule was not constitutionally *required*, he did not also opine that it was constitutionally *impermissible*, much less call for reconsidering this Court's century-old precedent in *Weeks v. United States*, 232 U.S. 383 (1919).

e. Finally, the government's vehicle objection, if accepted here, would forestall review of the question presented in *every* criminal case. After all, every

---

the exclusionary rule is applied or cross petition for certiorari where the defendant seeks review. Here, the government neither preserved the issue nor cross petitioned.

defendant challenging a *Terry* frisk does so to exclude evidence. But there is no basis to categorically preclude review of the question presented in the criminal context. To the contrary, *Terry* frisks matter most in that context precisely because they lead to evidence and prosecutions. This case illustrates the point: a *Terry* frisk is what led to petitioner's felony conviction resulting in a prison sentence of more than four years.

Meanwhile, it would be artificial and difficult to tee up the question presented in a civil case. The question would affect the outcome only where there is a *valid Terry* frisk. But the (few) cases seeking injunctive relief challenge *invalid* frisk practices, and they typically result in settlements, not appeals. And any test case seeking money damages for a *Terry*-compliant frisk would be quickly dismissed on qualified immunity grounds, obstructing this Court's ability to reconsider *Terry*'s holding. This criminal case, by contrast, cleanly presents that exceptionally important question for review, and it will determine the outcome. No better vehicle could come to this Court.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

HECTOR A. DOPICO
FEDERAL PUBLIC DEFENDER

/s/ Andrew L. Adler
ANDREW L. ADLER
Counsel of Record
ASHLEY D. KAY
ASS'T FED. PUBLIC DEFENDERS
1 E. Broward Blvd., Ste. 1100
Ft. Lauderdale, FL 33301
(954) 356-7436
Andrew_Adler@fd.org