

ORIGINAL

IN THE SUPREME COURT OF OHIO

STATE OF OHIO,

Plaintiff-Appellee,

v.

BRANDON MOORE,

Defendant-Appellant.

CASE NO. 2014-0120

ON DISCRETIONARY APPEAL
FROM THE MAHONING
COUNTY COURT OF APPEAL,
SEVENTH APPELLATE DISTRICT,
CASE NO. 08MA20

NOTICE OF SUPPLEMENTAL AUTHORITY

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FILED
MAR 20 2014
CLERK OF COURT
SUPREME COURT OF OHIO

NOTICE OF SUPPLEMENTAL AUTHORITY

Appellant Brandon Moore, pursuant to Supreme Court Practice Rule 7.04(2), submits this notice of newly-decided Supreme Court precedent to supplement his jurisdictional memorandum in which he contests the constitutionality of his 112-year sentence for committing a nonhomicide offense when he was 15-years-old. The relevant citation is: *State v. Long*, Slip Opinion No. 2014-Ohio-849, ¶ 13 and paragraph one of the syllabus (decided March 12, 2014) (holding that the youth of a 17-year-old juvenile offender convicted of aggravated murder must be considered “as a mitigating factor before imposing a sentence of life without parole” because “*Graham* insists that youth matters in determining the appropriateness of a lifetime of incarceration”) (quoting *Miller v. Alabama*, ___ U.S. ___, 132 S.Ct. 2455, 2465, 183 L.Ed.2d 407 (2012)).

Respectfully submitted,



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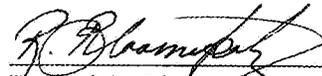
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Notice of Supplemental Authority was served by regular, U.S. Mail, postage prepaid, to Ralph Rivera, Esq., Assistant Mahoning County Prosecutor, 21 W. Boardman Street, 6th Floor, Youngstown, Ohio 44503, on this 20th day of March, 2014.



Rachel S. Bloomekatz