

IN THE SUPREME COURT OF OHIO

STATE OF OHIO,	:	
	:	
Plaintiff-Appellee,	:	CASE NO. 2014-0120
	:	
v.	:	ON DISCRETIONARY APPEAL
	:	FROM THE MAHONING
BRANDON MOORE,	:	COUNTY COURT OF APPEAL,
	:	SEVENTH APPELLATE DISTRICT,
Defendant-Appellant.	:	CASE NO. 08MA20

NOTICE OF SUPPLEMENTAL AUTHORITY

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NOTICE OF SUPPLEMENTAL AUTHORITY

Appellant Brandon Moore, pursuant to Supreme Court Practice Rule 17.09(B), submits this notice of newly-decided precedent from the Supreme Court of Florida, reversing a case from the District Court of Appeal of Florida relied on by Respondent. (*See, e.g.*, Resp. Br. at 25-26.) The relevant citation is: *Henry v. Florida*, No. SC12-578, 2015 WL 1239696 (Fla. Mar. 19, 2015) (holding that when juvenile is convicted of multiple nonhomicide offenses, “aggregate sentence, which totals ninety years and requires him to be imprisoned until he is at least ninety-five years old . . . is unconstitutional under *Graham*”).

Respectfully submitted,

/s Rachel S. Bloomekatz

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Supplemental Authority was served by regular, U.S. Mail, postage prepaid, to Paul J. Gains, Esq., Mahoning County Prosecuting Attorney and Ralph Rivera, Esq., Assistant Mahoning County Prosecutor, 21 W. Boardman Street, 6th Floor, Youngstown, Ohio 44503, on this 20th day of March, 2015.

/s Rachel S. Bloomekatz
Rachel S. Bloomekatz
