

**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

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**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 relevant, newly-decided precedent from the Supreme Court of Illinois holding that a juvenile sentenced to aggregate consecutive terms amounting to 89 years imprisonment without the possibility of release is entitled to the Eighth Amendment protection afforded juveniles given a single “life without parole” sentence. The relevant citation is: *People v. Reyes*, \_\_ N.E.2d. \_\_, 2016 IL 119271, 2016 Ill. LEXIS 770, 2016 WL 5239589, ¶9 (Sept. 22, 2016) (A “term-of-years sentence that cannot be served in one lifetime has the same practical effect on a juvenile defendant’s life as would an actual mandatory sentence of life without parole—in either situation, the juvenile will die in prison.”).

Respectfully submitted,

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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 Paul J. Gains, Esq., Mahoning County Prosecutor, and Ralph Rivera, Esq., Assistant Mahoning County Prosecutor, 21 W. Boardman Street, 6th Floor, Youngstown, Ohio 44503, on this 23rd day of September, 2016.

/s Rachel S. Bloomekatz  
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Rachel S. Bloomekatz