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STATE OF WISCONSIN

COURT OF APPEALS

DISTRICT I

Case No. 2015AP001325CR

STATE OF WISCONSIN,
Plaintiff-Respondent,

v.

GEORGE D. TAYLOR,
Defendant-Appellant.

ON APPEAL FROM THE JUDGMENT OF CONVICTION
AND THE ORDER DENYING
MOTIONS FOR POSTCONVICTION RELIEF
ENTERED IN MILWAUKEE COUNTY COURT,
THE HON. DAVID L. BOROWSKI PRESIDING,
CIRCUIT COURT CASE NO. 2012-CF-1509

REPLY BRIEF OF DEFENDANT-APPELLANT

Respectfully submitted:

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ARGUMENT [1]

INTRODUCTION

These facts are admitted by the Brief of Plaintiff-Respondent ("Brief") or not denied/rebutted, thus deemed admitted. *See State v. Chu*, 2002 WI App 98, P41, 253 Wis.2d 666, 643 N.W.2d 878 (argument admitted when not responded to); *Charolais Breeding Ranches v. FPC Secs. Corp.*, 90 Wis.2d 97, 109, 279 N.W.2d 493 (Ct.App.1979):

1. Taylor was charged solely on Saffold's claims that Saffold had seen Taylor hanging out with co-defendants near Saffold prior to Cort's shooting, observing Cort's arrival and commenting simultaneously on it; and then spiriting the shooter away in white BMW.

2. Saffold's accusations were the sole evidence incriminating Taylor, hinging acquittal/conviction solely on Saffold's credibility.

3. Pre-trial the State shared with Taylor a composite DVD (later a trial exhibit) of excerpts from surveillance footage showing only Cort's arrival at the scene, shooting, and departure.

4. Pre-trial Taylor sought from the State copies of *additional* surveillance footage (not captured in the composite DVD) showing the parking lot of Jack's

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[1] The roman numbering of individual arguments here tracks that found in Taylor's Brief of Defendant-Appellant. It was also tracked by the State's Brief. Argument *sub-sections* here, marked by capital letters, are numbered consecutively and thus do necessarily correspond to the subsections in Taylor's brief in chief.

before the crime, but was told that no additional footage existed.

5. Post-conviction the State released additional surveillance footage ("withheld footage") showing Taylor at Jack's lot before the crime. [2]

6. After evidence closed, the jury was "at an impasse" regarding Taylor.

7. The withheld footage shows Taylor at Jack's lot just prior to the crime; leaving the lot 3 seconds prior to Cort's arrival; crossing Hampton in the second immediately preceding Cort's arrival. See Brief, p. 8 (stating footage shows Taylor "leaving Jack's lot, crossing to MacDonald's on the corner of Hampton Avenue and 50th Street (67:Ex. A-Camera 3 at 00:57)"; (stating footage shows Taylor talking to "persons on the corner by the McDonald's sign, then crossing Hampton Avenue in the direction of Saffold's apartment complex (67:Ex.A-Camera 3 at *00:59*)"); (stating footage shows "Cort's orange car pull into the parking lot (id. at *1:00*).)." (emphases added).

8. Taylor's location and actions on the withheld footage are inconsistent with Saffold's descriptions of them.

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[2] See Taylor's Brief at ft.8.

I. *BRADY* VIOLATIONS

A. THE WITHHELD FOOTAGE WAS "MATERIAL"

The withheld footage corroborates some of Saffold's account of Cort's homicide, c.f. Brief at 5, but only portions unrelated to Taylor. Nothing supports the Brief's claim that the footage would hurt Taylor's defense and not affect Taylor's verdict, if placed in evidence. See id. at 10.

The footage corroborates only portions of Saffold's testimony *not* useful to proving *Taylor's* guilt: describing Cort's arrival at Jack's, shooting, and departure. [3] Regarding Taylor, the withheld footage corroborates only Taylor's *innocent* presence near the scene. Corroboration of non-criminal conduct could *not* help prove Taylor's charge or support Taylor's conviction. Nothing in the Brief suggests otherwise.

The footage could only help *Taylor*, even if it hurt his co-defendants.[4] Contrary to Saffold's testimony, footage

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[3] Because the Brief fails to rebut this claim, Taylor asks this Court to deem it admitted. *Charolais*, 90 Wis.2d at 109.

[4] Taylor re-asserts that his position in this prosecution was drastically different that the positions of his co-defendants, because *only* Saffold's flimsy, shifting, paid-for, rebuttable testimony arguably tied *Taylor* to the crime, while various other evidence supported his co-defendants' involvement. The State fails to acknowledge, deny, or rebut the claim of Taylor's unique place in the evidentiary landscape, compared to his co-defendants, thus admits it. *State v. Chu*, 2002 WI App 98, P41, 253 Wis.2d 666, 643 N.W.2d 878 (defendant's failure to respond to State's argument effects finding that argument admitted); *Charolais Breeding Ranches v. FPC Secs. Corp.*, 90 Wis.2d 97, 109, 279 N.W.2d 493 (Ct.App.1979). As argued elsewhere in this Reply

from Camera 3 (67:Ex. A-Camera 3 at 00:57 through 1:00) shows that Taylor was *not* standing and talking with co-defendants near Saffold just before Cort's arrival and during it, and did not observe that arrival from across the street or simultaneously comment on it. [5] In so showing, that footage:

1. rebuts Saffold's testimony about *Taylor*,
2. shows that Saffold's recall of *Taylor's* conduct was incorrect, his testimony false and unreliable, and meriting no weight; and
3. destroys Saffold's credibility as *Taylor's* sole accuser, pulling the evidentiary carpet from under the State's case against Taylor.

These three effects could only help *Taylor's* defense. By failing to rebut them, the Brief admits them. *Charolais, 90 Wis.2d at 109.*

The Brief selectively overlooks that the footage corroborates *none* of Saffold's arguably incriminating testimony against *Taylor*. It selectively overlooks that the footage only shows a 1 second time lapse between Taylor leaving Jack's parking lot and Cort's arrival. By vaguely referring to "defendants" the Brief insinuates -- falsely -- that the video corroborates Saffold's accusations against *Taylor*. Id. at 6.

According to the Brief "*shortly after* Taylor crosse[d] Hampton Avenue" Cort pulled into Jack's parking

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Brief, while the video could arguably harm co-defendants' defenses, it could *only* strengthen *Taylor's* defense and would cause his acquittal, by resolving in Taylor's favor the jury's "impasse" regarding Taylor's guilt.

[5] See infra for detailed analysis of this point.

lot. Id. at 8. Based on the timing stated in the Brief, "shortly after" means at best "1 second later."

The footage shows that Taylor could not have been across the street with co-defendants to watch Cort's arrival at Jack's and comment on Cort's arrival, as Saffold testified. One second was insufficient to cross Hampton Avenue during evening traffic, get into the courtyard, resume observing with others, watch Cort arrive, and comment on his arrival.

Footage from Camera 3 would solidify or resolve the jury's "impasse" about Taylor, leading to a hung jury or acquittal, by:

1. rebutting Saffold's testimony about Taylor's behavior,

2. showing Saffold's recall of and testimony against Taylor to be inaccurate and unreliable, thus debunking the sole evidence against Taylor; and

3. destroying Saffold's credibility as Taylor's accuser.

Because such footage was "material," its non-disclosure undermines confidence in the outcome of the trial. *See Kyles v. Whitley,* 514 U.S. 419, 434, 115 S. Ct. 1555, 131 L.Ed.2d 490 (1995).

B. WITHHELD PRE-TRIAL PAYMENT TO SAFFOLD WAS "MATERIAL"

The Brief denies the materiality of the withheld pre-trial payment to Saffold of $770 due to its "modest size" (compared to the $10K of the expected reward). Id. at 14.

This glosses over the key distinction between two money gifts to Saffold: the $770 *was* given *pre-trial*, while the $10K *might* be given *after*. Taylor had the right to expose this pre-trial gift to the jury, so it could determine Saffold's credibility, even if doing so presented risks. See *Kohlhoff v. State,* 85 Wis.2d 148, 154, 270 N.W.2d 63, 66 (Ct.App.1992) (credibility decided by jury).

The Brief mistakenly claims that Taylor complains about improper withholding of a "chain of emails" regarding the pre-trial payment. Id. at 13.

Taylor complains about the withholding of *$770 pre-trial payment,* so he could not strategically ask the jury to decide its implications for Saffold's already-compromised credibility, or ask the court to dismiss based on such payment.

Like the withheld footage, this non-disclosure *additionally* unfairly prevented Taylor from presenting a complete defense and having the *jury* decide how credible Saffold was and what weight to give to his accusations. *Kohlhoff,* 85 Wis.2d at 154.

"Materiality" is assessed collectively, not item by item. *Kyles,* 514 U.S. at 434–36. Collectively the withheld the footage and pre-trial payment were "material" because they would further chip away at Saffold's crumbling credibility (c.f. jury's "impasse"), solidifying that "impasse" or resolving it, to cause mistrial by a hung jury or acquittal.

Taylor's verdict merits no confidence when Taylor's *sole* accuser *both* falsely testified about Taylor's actions before the crime (c.f. Camera 3 footage) *and* received pre-trial gifts which secured his testimony, and when the jury was already at an "impasse" over Taylor -- but impeaching

and exculpatory evidence was not presented (but withheld from the defense). *Kyles*, 514 U.S. at 434.

The Brief, at pp. 13-14, imagines the jury's balancing job from the biased position of the State's advocate, ignoring the jury's "impasse" about Taylor and the fact that Saffold was the *sole* source of evidence against Taylor. Nothing in the record, the law, or reason suggests that *the jury* would assess and balance the withheld (vs. other) evidence as the Brief imagines it would.

C. CHALLENGING THE QUALITY AND RELIABILITY OF THE INVESTIGATION AND ITS FRUITS BY EXPOSING DETECTIVE GOMEZ'S MISCONDUCT.

With Gomez's misconduct timely disclosed, Taylor could have delayed the trial to more fully understand and prove Gomez's misconduct, then use it to challenge the reliability and weight of *evidence* acquired through Gomez (including Saffold's first accusations in a one-on-one interview with Gomez).

The Brief admits, at pp. 19-20, that the quality of the investigation was attacked in trial and in closing. [6]

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[6] The Brief refers to the fact that this defense was raised earlier in trial, but cites only to pages 48-49 of the transcripts of closing arguments. (114:48-49). Indeed, every defendant presented the theory that investigation procedures had been shoddy, irregular, and suspicious, and the resulting evidence unreliable. On the second day of trial defense counsels cross-examined detective Formolo about the investigative steps taken in this case, Gomez's central role in the investigation, his (oddly belated) discovery of the bullet, departures from recommended investigative practices, reasons for use of non-standard procedures, etc. See e.g. (106:39-49) (Hopgood cross-examining detective on the course of the investigation, Gomez's central role, belated search for and discovery of bullet, departures from

The Brief misrepresents the record in stating, at page 16, that *"[w]ithout anything else in the record to support . . .* a shady investigation in this case" Gomez's misconduct -- if introduced by the defense -- would "merely invite speculation by the jury" and not help Taylor. See Note 5, supra.

Taylor argues that the product of the investigation -- evidence discovered by Gomez (e.g. Saffold's first police statement) -- could be attacked (as stemming from shady investigation), its reliability impeached, and the weight given it by the jury diminished. Taylor's Brief at 11. The Brief fails to rebut this argument, thus admitting it. *Charolais,* 90 Wis.2d at 109.

II. PROSECUTORIAL MISCONDUCT

The Brief, at p.20, professes to assess the prosecutor's conduct against "the full context" of what went on in court, but ignores context unfavorable to its argument.

The "full context" ignored in the Brief includes these uncontroverted facts of record:

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standard practice; counsel sounding "a little too close to argumentative," "borderline snarky" probing into the quality of the investigation); (106:49-58) (Riley probing detective about quality of investigation, Gomez's role in it, departures from best practices; eliciting testimony about odd lack of bullet holes in the car where Gomez found he bullet); (106:58-60) (Taylor's follow-up cross-examination of detective); (106:62-71) (prosecutor, counsel discussing in jury's absence defendants' strategies of attacking investigation procedures as improper and/or shady, and resulting evidence as unreliable; prosecutor introducing exhibits to rebut this defense theory). (106:72 et seq.) (prosecutor on re-direct eliciting testimony from detective to rebut defense theory of improper investigation and unreliable evidence).

1. The prosecutor directly told and indirectly communicated to the jury that "38 members of the police Department" on his witness list had incriminating evidence and that evidence on "discs and interviews and photographs turned over to the defense, A through X . . . [and] the "M" file . . . provided to the defense" supported the prosecution. (R.114:66).

2. After these improper comments were struck, the prosecutor *again* let the jury know that they were spared the presentation of additional incriminating evidence, to save time. (W114:72) ("And part of that is let's get on with the case, let's not delay -- let's not call 38 people from the Milwaukee Police Department..."). [7]

3. The prosecutor enhanced the import of these comments by standing up and lifting a thick file/folder allegedly with incriminating evidence the jury was spared, and "waving around all of those reports, all of those disks, suggesting that he could have done a whole lot more if he really wanted to." Id at. 28.

4. The prosecutor enhanced these comments' import also by using raised voice and shouting over objecting defense counsel. Id. at 27-28.

5. Thereby the prosecutor in fact "signal[ed] to the jury," Brief at 20, that they could consider additional profuse evidence supporting the prosecution.

This "full context" on record shows that the prosecutor argued about matters not in the evidence; assured the jury that additional incriminating evidence existed; and allowed the jury to consider alleged "evidence"

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[7] Those remarks were stricken for improperly arguing facts not in the evidence and encouraging the jury to consider things outside the evidence. Id. at 73.

in making verdicts. This sustained, deliberate, willful conduct "so infected the trial with unfairness" as to warrant mistrial. *State v. Wolff,* 171 Wis.2d 161, 167, 491 N.W.2d 498, 501 (Wis.Ct.App.1992)

Based on this record, it is "implausible [for the Brief] to assert," id. at 20, that the jury would did not consider that improperly proffered alleged "evidence" in deciding the case.

III. THE LIMITATION ON SAFFOLD'S CROSS-EXAMINATION

Taylor sought to cross-examine Saffold's *subjective* feelings regarding the felony charge for drug possession, to fully explore *all* his distinct, powerful, mutually-reinforcing motivations for incriminating Taylor. [8]

The Brief argues that limits on such cross were at worst harmless error because "the jury was well aware of Saffold's admitted motivations to fabricate testimony." Id. at 23.

The jury was *somewhat* aware of only *some* of Saffold's motivations. Court-imposed limits hid from the jury Saffold's subjective powerful fear that a cocaine charge would result in prison time, a burning desire to avoid that prison time and new record, to spare his DPA, etc.

Testimony about such intense subjective fears and hopes (however objectively unreasonable) would not be cumulative, because it would show *additional separate and distinct* motives for fabricating and their intensities, not otherwise displayed for the jury.

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[8] The Brief agrees that the sought cross-examination was for this legitimate reason. Id. at 22-23.

In barring further cross because it could mislead the jury -- since objective chances of being sent to prison were "slim to none," Brief at p. 24 -- the court betrayed its misunderstanding that Taylor sought to show Saffold's *subjective* thoughts and feelings, not objective chances of imprisonment. Taylor had the right to show the jury those unique, distinct, strong *subjective* motivations to fabricate related to the pending cocaine charge. There was nothing cumulative here and no risk of jury confusion.

Saffold's distinct, powerful, and mutually reinforcing motivations for fabricating were *not* all "adequately tested," State v. *Barreau*, 2002 WI App 198, P53. The jury did not hear "plenty," as the Brief asserts at p. 25, or even enough to fully see the number, intensity, scope, and force of the mutually-reinforcing motives for cooperation.

Unsupported, speculative, and contrary to the record (c.f. "impasse" about Taylor) is the claim that the "additional inquiry sought by Taylor would not have appreciably altered the jury's view of Saffold's credibility." Id.

Taylor's verdict hinged on Saffold's credibility alone. The jury was at "impasse" about Taylor's guilt/innocence -- therefore Saffold's credibility. This record makes it eminently plausible that unhampered exploration of Saffold's *all* distinct, intense *subjective* motivations to cooperate would "appreciably alter the jury's view of Saffold's credibility," id. at 25, reinforce or resolve the jury's "impasse," and prevent conviction.

IV. TAYLOR WAS IMPROPERLY TRIED WITH CO-DEFENDANTS

Taylor should have been tried separately, pursuant to *Haldane v. State*, 85 Wis.2d 182, 189, 270 N.W.2d 75 (1978), *State v. Jennaro*, 76 Wis.2d 499, 505, 251 N.W.2d 800 (1977), and *State v. Patricia A.M.*, 168 Wis.2d 724, 736, 484 N.W.2d 380 (Ct.App.1992).[9] The Brief does dispute or rebut this claim, so it is deemed admitted. *Charolais*, 90 Wis.2d at 109.

If joint trial was not the court's error, then counsel was ineffective for not securing separate trial. Counsel sought speedy trial with the goal of assuring separate trial. (R.98:12) (showing that he strategically prepared for a "compact," "focused" separate trial, un-muddled by evidence relevant only to Riley or Hopgood); (R.99:4) (arguing for separate trial); (R.99:2) (prosecutor admitting: "...Defendant Taylor's demand for speedy trial would act as a de facto severance..."). Abandoning this strategic goal was deficient.

Joint trial prejudiced Taylor by allowing the jury to convict Taylor based on voluminous evidence of co-defendants' brutal conduct, non-relevant to proving *Taylor's* charges, even the PTAC charge. Only 26 pages of Saffold's 117-page-long testimony concern Taylor's conduct. The rest incriminate his co-defendants, but -- by association -- besmear Taylor in the jury's eyes, exemplifying "prejudicial spill-over" uncured by a limiting instruction. *See Zafiro v. U.S.*, 506 U.S. 534, 539-41 (1993) (with high risk of prejudice limiting instructions may not

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[9] The unfair joint trial occurred because of trial court's failure sua sponte to ensure a fair separate trial, consistent with *State v. Patricia A.M.*, 168 Wis.2d 724, 736, 484 N.W.2d 380 (Ct.App.1992); or from counsel's ineffective failure to ensure a separate trial; of from the errors of *both* the court and counsel.

suffice to cure it). [10] Of 241 pages of remaining witness' testimony, none addressed *Taylor's* alleged acts. Over 3 days of trial witnesses told the jury about bad acts of co-defendants. Because Saffold's testimony and courtroom seating connected Taylor to Hopgood and Riley -- as friends and co-defendants respectively -- the jury naturally related *all* the evidence to Taylor, improperly. Never instructed to consider only evidence related to *Taylor*, they presumably relied on *all* the admitted evidence to convict Taylor, "by association" with his co-defendants. *Zafiro*, 506 U.S. at 539–41 (juries presumed to follow instructions).

V. COUNSEL WAS INEFFECTIVE

A. NOT PRESENTING KELLY WALTON'S TESTIMONY

Citing *State v. Jenkins*, 2014 WI 59, P62, 355 Wis.2d 180, 848 N.W.2d 786, the Brief claims that not calling Kelly Walton was not ineffective, because Walton could be impeached with a prior felony conviction. Id. at 30-31.

The cited-to paragraph in *Jenkins* strongly *supports* Taylor's argument that not calling Walton was ineffective.[11]

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[10] The Brief does not deny or rebut the "prejudicial spillover" argument, thereby admitting it. *Charolais*, 90 Wis.2d at 109.

[11] This paragraph states as follows, in whole: "¶ 62 Wisconsin case law has similarly recognized that when a potential witness "would have added a great deal of substance and credibility" to the defendant's theory and when the witness "could not have been impeached as having a criminal record," the exclusion of the witness's testimony is prejudicial, even if the witness's credibility could be impeached. State v. Cooks, 2006 WI App 262, ¶ 63, 297 Wis.2d 633, 726 N.W.2d 322."

Nothing supports that that counsel was not ineffective for not calling Walton. The Brief in no way supports or develops that, or why, or how, potential impeachability justified failure to call the one witness who would rebut Saffold's accusations against Taylor. This Court need not address this undeveloped argument. *See State v. Pettit*, 171 Wis.2d 627, 646, 492 N.W.2d 633 (Ct. App. 1992).

The Brief does not rebut Taylor's argument that counsel's various multiple deficiencies, considered cumulatively, clearly prejudiced him. Taylor's Brief at p. 34. Taylor's argument of cumulative prejudice should be deemed admitted. *Charolais,* 90 Wis.2d at 109.

B. NOT IMPEACHING SAFFOLD WITH PRIOR STATEMENTS TO THE POLICE

Per the Brief, at pp. 31-32, not impeaching Saffold's trial testimony with prior statements was effective because:

-- those statements "*obviously* [were] a rough estimate and did not *necessarily* mean" that Saffold's prior statements were contradictory to his testimony, and

-- "neither of these [prior statements] *is inconsistent* with Saffold's testimony."

(emphasis added).

The Brief's conclusory and loose wording masks illogic and advocate's bias. The Brief imputes to Saffold "obvious rough estimating" without support. Even if those statements did not "necessarily" contradict trial testimony, the Brief still does not rebut or deny -- thus admits -- that those prior statements *arguably* were contradictory, potentially usable for further impeachment. The Brief conclusorily overstates that "neither of these . . . statements is inconsistent with Saffold's testimony." Arguably inconsistencies existed and Taylor had the right to so tell the jury, which alone would determine how serious the contradiction was and how it impacted their view of

Saffold's credibility. A*ny additional* chip away from the already-crumbling effigy of Saffold's credibility would -- in light of the jury's "impasse" -- result in hung jury or acquittal. So not performing this impeachment prejudiced Taylor.

VI. NEW TRIAL IN THE INTEREST OF JUSTICE

A new trial in the interest of justice is warranted when *combined* errors warrant reversal. *See State v. Marshal,* 172 Wis.2d 491, 507, 493 N.W.2d 758 (Ct.App.1992). Here combined multiple barriers to further impeaching Saffold's credibility have caused the issue of Saffold's credibility to not be fully tried, including:

1. the State's failure to disclose material video evidence which would rebut Saffold's specific accusations against Taylor, show that he lacked recall of Taylor's conduct at the critical time, and destroy his credibility as Taylor's accuser.
2. the court's improper limitation on Saffold's cross-examination regarding *subjective* state of mind (about pending felony charge) which motivated his fabrication.
3. counsel's ineffective failure to present testimony from Kelly Walton, to impeach Saffold's credibility and rebut his accusations.

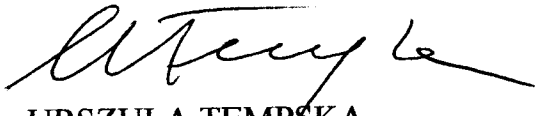
Hollow sounds the Brief's claim, at p. 38, that "Taylor . . . had ample opportunity -- of which [he] took full advantage -- to assail the credibility of Saffold."

CONCLUSION

Because for the aforementioned reasons Taylor did not receive a fair trial, he asks this Court to vacate his conviction and remand for a new trial.

Dated this 24th day of March, 2016.

Respectfully submitted,



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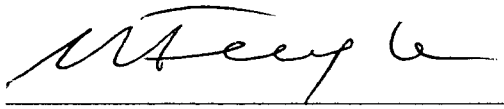
CERTIFICATION AS TO FORM/LENGTH AND AS TO MAILING

I certify that this reply brief meets the form and length requirements of Rule 809.19(8)(b) and (c) in that it is: proportional serif font, minimum printing resolution of 200 dots per inch, 13 point body text, 11 point for quotes and footnotes, leading of minimum 2 points and maximum of 60 characters per line of body text. The length of the reply brief is 2,950 words.

I certify that the required number of copies of this brief have been mailed to the Court of Appeals and to the parties to this appeal by U.S. Post or third-party commercial carrier on/before November 16, 2015, for delivery to the Clerk of Court of Appeals within 3 days. Wis. Stats. Section 809.80(3)(b).

Dated this 24th day of March, 2016.

Signed:



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CERTIFICATE OF COMPLIANCE WITH RULE 809.19(12)

I hereby certify that:

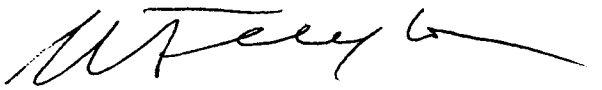
I have submitted an electronic copy of this brief, excluding the appendix, if any, which complies with the requirements of § 809.19(12). I further certify that:

This electronic brief is identical in content and format to the printed form of the brief filed on or after this date.

A copy of this certificate has been served with the paper copies of this brief filed with the court and served on all opposing parties.

Dated this 24th day of March, 2016.

Signed:



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