

**IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA**

STATE OF FLORIDA,
Plaintiff

Case No: 98-5739CF10A

V.

ERNESTO BRHRENS,
Defendant.

**DEFENDANT'S MOTION TO QUASH PRIOR RULINGS MADE BY RECUSED JUDGE
AFTER MOTION FOR RECUSAL WAS DEEMED GRANTED; FOR SUCCESSOR
JUDGE TO RECONSIDER SUCH RULINGS PURSUANT TO FLA. R. JUD. ADMN.
2.330(h); AND FOR SUCCESSOR JUDGE TO ENTER FINAL RULINGS ON
CURRENTLY PENDING MOTIONS IGNORED BY RECUSED JUDGE**

COMES NOW, the Defendant, Ernesto Behrens, *pro se*, and respectfully moves this successor Judge pursuant to Fla. R. Jud. Admn. 2.330(h) to reconsider, vacate or amend prior factual and/or legal independent rulings previously made by recused Judge Andrew L. Siegel in this case, after the Defendant's Motion for Recusal was deemed to be granted. It should be noted that the instant Motion is being filed within 20 days of the Order of Disqualification. The Defendant in furtherance thereof, will show as follows:

BACKGROUND

1. On June 29, 2020, the Defendant mailed/served on Judge Andrew L. Siegel a Motion for Disqualification of Judge, referencing the above-styled Lower Tribunal Case Number.

2. The Motion concerned Judge Siegel's actions stemming from:

- a. The Judge's familial relationship with the former Assistant State Attorney and future key witness in this case, Mr. Dennis E. Siegel; and
- b. Judge Andrew L. Siegel's predisposed demeanor toward this case, reflecting bias in favor of the State, and causing the Defendant to fear that he will not receive a fair Post Conviction hearing.

3. As there was no ruling on the Motion for Disqualification within the thirty-day period provided by Florida Rule of Judicial Administration 2.330(j), the Defendant on August 6, 2020, mailed/served his Motion for an order directing the Clerk of Court to reassign the case.

4. However, on August 4, 2020 Judge Andrew L. Siegel entered an Order Summarily Denying the Defendant's Motion to Recuse.

5. On August 10, 2020, the Defendant filed his Petition for Writ of Mandamus within the Fourth District Court of Appeal. The Defendant specifically sought for the Court's August 4, 2020 Order Denying his Motion to Recuse the Judge to be quashed. Specifically, because the Judge's failure to timely rule on his Motion for Recusal. Additionally, the Defendant sought for his case to be reassigned to a different Circuit Court judge.

6. On August 31, 2020, the State filed its 467 pages "Response" to the Defendant's "Second Amended Motion for Postconviction Relief."

7. On September 1, 2020, the State filed its 95 pages "Response" to the Defendant's "Motion for a Court Order Compelling the BSO Crime Lab to Release all DNA Testing Conducted in this Case (RFLP and PCR) to be Reviewed and Inspected by Defendant's DNA Consultant, Tiffany Roy."

8. On September 2, 2020, Judge Siegel, knowingly that there was a litigation pending at the Fourth District Court of Appeal requesting his recusal from this case, entered anyway his Order Summarily Denying the Defendant's Motion.

9. On September 8, 2020, the Defendant filed his "Reply" to the State's Response on "Motion for a Court Order Compelling the BSO Crime Lab to Release all DNA Testing Conducted in this

Case (RFLP and PCR) to be Reviewed and Inspected by Defendant's DNA Consultant, Tiffany Roy." However, this Motion is currently pending without a final ruling by the Court.

10. On September 18, 2020, the Fourth District Court issued a Show Cause Order to the State on his Petition for Writ of Mandamus.

11. On September 28, 2020, the Defendant filed his "Motion for Rehearing" on the "Second Amended Motion for Postconviction relief." However, in abundance of caution, the Defendant made the following statements for the Judge's consideration:

" That until the Fourth District Court of Appeal enters its ruling on the Defendant's Petition for Writ of Mandamus (addressing the Defendant's Motion to Disqualify Judge Andrew L. Siegel), Judge Siegel does not have proper jurisdiction to entertain neither the State's Response nor the Defendant's instant Motion for Rehearing. Only the Chief Judge, the Honorable Jack Tuter of the Seventeen Judicial Circuit in and for Broward County has inherent and temporary jurisdiction over this case and therefore, only the Chief Judge should rule in the interim over anyone of the currently pending Motions in this case... That for the above-mentioned reasons the instant Court's Order Denying the Defendant's Second Amended Motion for Postconviction Relief should be therefore considered as premature and unauthorized."

12. On October 8, 2020, the State timely responded to the Defendant's Petition for Writ of Mandamus.

13. On October 29, 2020, Judge Siegel, as it was expected, Summarily Denied the Defendant's Motion for Rehearing knowingly that the Fourth District Court of Appeal had not yet ruled on the Motion for Recusal and totally ignored the DNA Report attached by DNA Consultant Tiffany Roy, which depicts her serious concerns about the sole inculpatory DNA evidence of this case.

14. On November 3, 2020, the Fourth District Court of Appeal granted the Defendant's Petition, quashing the Court's August 4, 2020 Order of Denial, and remanded for the Clerk of Court to reassign the case.

15. However, due to the recused Judge Siegel's continuous unauthorized rulings and lack of timely rulings on the Defendant's Motions. The Defendant respectfully requests for this successor Judge to quash the recused Judge's prior unauthorized rulings, reconsider his previous

rulings on the merits and promptly enter its final rulings on the Defendant's currently pending Motions.

INTRODUCTION

16. Rule 2.330(h) provides that "[p]rior factual or legal rulings by a disqualified judge may be reconsidered and vacated or amended by a successor judge based upon a motion for reconsideration." Rule 2.330 requires "the litigant to detail the reasons for the necessity of reconsideration and point the successor judge to all parts of the record necessary to determine whether to vacate the prior ruling." *Rath v. Network Mktg., L.C.*, 944 So.2d 485, 487 (Fla. 4th DCA 2006). "[W]hen presented with a prior interlocutory ruling that is based on a clearly mistaken interpretation of the law it is indeed appropriate for the succeeding judge to vacate or modify the prior order." *Russ v. City of Jacksonville*, 734 So.2d 508, 511 (Fla. 1st DCA 1999) (citation omitted). Additionally, "the successor judge must consider whether the rulings work an injustice on the party as well as the effect of reconsideration of a multitude of rulings on the administration of justice." *Rath*, 944 So.2d at 487. "The purpose of reconsideration is to remove the taint of prejudice where rulings might be perceived as so tainted. It should not be used merely to obtain 'a second bite at the apple' with respect to prior judicial rulings." *Id.* See also *Ognenovic v. David J. Giannone, Inc.*, 184 So. 3d 1135, 1137 (Fla. 4th DCA 2015) (describing considerations for reconsideration).

ARGUMENT

17. Here, the Defendant avers that he is entitled to a de novo review on each one of the two (2) Motions on which he is requesting reconsideration.

18. Where a Motion for Reconsideration is made, it is reasonable for the litigant to detail the reasons for the necessity of reconsideration and point the successor judge to all parts of the record necessary to determine whether to vacate the prior ruling if it has been entered or whether to enter a ruling where there have not been one yet issued.

19. Then, after review of the Motion and the record, the Court can determine on the record whether reconsideration of a Motion should occur, and as to those Motions, the Court may wish to enter a ruling and/or set a hearing and conduct further proceedings.

20. The Orders in this particular case constitute rulings on a Postconviction issue solely related to DNA evidence which imposes a liability on the Defendant.

21. It seems to the Defendant that this successor Judge must consider whether the ruling or lack of rulings work an injustice on the Defendant as well as the effect of reconsideration of the specific requested rulings on the administration of justice.

22. It is a well settled law that the purpose of reconsideration is to remove the taint of prejudice where rulings might be perceived as so tainted. It should not be used merely to obtain "a second bite at the apple" with respect to prior judicial rulings.

23. Thus, a proper Motion, as the Fourth District held, must be timely and must "detail the reasons for the necessity of reconsideration and point the successor judge to all parts of the record necessary to determine whether to vacate the prior ruling." *Id.* at 2. The Fourth District Court explained, in pertinent part, that:

"The purpose of reconsideration is to remove the taint of prejudice where rulings might be perceived as so tainted. It should not be used merely to obtain 'a second bite at the apple' with respect to prior judicial rulings." *Id.*

Here, contrary to *Rath*, the Defendant "indicates how the grounds alleged for recusal impacted the recused judge's rulings on these Motions" and/or demonstrates the kind of prejudice he suffered from the initial trial judge's entry of the September and October 2020 Orders of Denial. The Defendant also demonstrates how the Orders were "based on a clearly mistaken interpretation of the law" as required by rule 2.330. *Russ*, 734 So.2d at 511 (citation omitted).

24. It is worth mentioning the properly recognized distinction between recusal due to consanguinity, following which reconsideration is available as a matter of right, and recusal due to alleged bias or prejudice, following which reconsideration is both discretionary and requires

the movant to show more than the mere recusal. Especially, because the Defendant raised in his Motion both of these prongs.

However, since the Fourth District Court of Appeal's decision was silent, as to the two prongs raised by the Defendant, and instead, the Court focused on the untimeliness of the lower Court's ruling over the Motion. The Defendant, in abundance of caution, does clarify to this Court that this Motion does not rely solely on the prior recusal to secure reconsideration of the prior rulings. But instead he is "indicat[ing] how the grounds alleged for recusal impacted the recused judge's rulings."

PRIOR RULINGS TO BE QUASHED AND RECONSIDERED BY SUCCESSOR JUDGE

25. The prior rulings that are being presented to this Court to be quashed and reconsidered by this Court are the following:

- a. "THE ORDER OF DENIAL ON THE DEFENDANT'S SECOND AMENDED MOTION FOR POST CONVICTION RELIEF"

This Motion was filed on or about April 11, 2019. The trial Court issued a Show Cause Order to the State on April 16, 2019. The State finally responded on August 31, 2020. On September 8, 2020, the Defendant filed "Defendant's Motion For Leave To File-within 60 Days From The Day Of This Motion A Reply To The State's Response Filed On August 31, 2020."

Nevertheless, without the Defendant's knowledge, the recused Judge had already entered his Order of Summary Denial on September 2, 2020.

- b. "THE ORDER OF DENIAL ON THE DEFENDANT'S MOTION FOR REHEARING ON THE SECOND AMENDED MOTION FOR POST CONVICTION RELIEF"

This Motion was filed on September 28, 2020 and on October 29, 2020, the recused Judge entered his Order Denying the Defendant's Motion for Rehearing.

Nevertheless, on November 3, 2020, the Fourth District Court of Appeal entered an Order Granting the Defendant's Petition for Writ of Mandamus and ultimately recusing Judge Andrew L. Siegel from this case. See Case Number: 4D20-1851. This Order from the DCA states in pertinent part: "... Because service was by mail, the judge had until August 3, 2020 to rule on the motion... By failing to timely rule on the motion is deemed granted... The August 4, 2020 order is quashed, and on remand the clerk shall reassign the case."

[I.] AQUASHING PRIOR RULINGS BY SUCCESSOR JUDGE

As it is clearly shown above, the DCA quashed the recused Judge's Order of Denial entered on August 4, 2020, simply because at that specific time the Defendant's Motion for Recusal was deemed to have been granted and Judge Siegel did not have any authority to entertain any further Motions related to this case. Therefore, applying the very same reasoning that the DCA applied while quashing the August 4, 2020's Order. The Defendant respectfully submits that the recused Judge's Orders of Denial respectively entered on September 2, 2020 and October 29, 2020, shall be equally quashed by this Court and instead, the Court should reconsider them on their individual merits.

Both of these Orders were entered after August 3, 2020, when the recused judge lost his authority over this case and before November 3, 2020, when the DCA entered its Order on the Recusal Motion.

[II.] RECONSIDERING PRIOR RULINGS BY SUCCESSOR JUDGE

The Defendant promptly filed an under oath Motion to disqualify Judge Siegel under section 38.10 and rule 2.330(d)(1). The Defendant alleged that he feared he would not receive a fair Postconviction proceeding. A Motion to disqualify a trial judge for alleged bias or prejudice is regulated substantively by section 38.10 and procedurally by rule 2.330. See *Peterson v. State*, 221 So. 3d 571, 581 (Fla. 2017) (quoting *Gore v. State*, 964 So. 2d 1257, 1268 (Fla. 2007)). Section 38.10 provides in relevant part that:

Whenever a party to any action or proceeding makes and files an affidavit stating fear that he or she will not receive a fair trial . . . on account of the prejudice of the judge of that court against the applicant or in favor of the adverse party, the judge shall proceed no further Rule 2.330(c)-(d), in turn, provides that a motion to disqualify shall be sworn to by affidavit, shall "allege specifically the facts and reasons" supporting disqualification, and shall show "that the party fears that he or she will not receive a fair trial or hearing because of specifically described prejudice or bias of the judge." And rule 2.330(f) provides that the judge against whom a disqualification motion is directed "shall determine only the legal sufficiency of the motion and shall not pass on the truth of the facts alleged." "If the motion is legally sufficient, the judge shall immediately enter an order granting disqualification and proceed no further in the action." *Id.*

Taken together, the statute and rule require that a trial judge disqualify himself when the sworn Motion contains allegations that are sufficient to establish an objectively reasonable fear that the

movant will not receive a fair trial because of some bias or prejudice of the judge. See *Pena v. State*, 259 So. 3d 223, 227 (Fla. 2d DCA 2018) (quoting *Gregory v. State*, 118 So. 3d 770, 778 (Fla. 2013)). Whether the allegations are true or false or somewhere in between is beside the point. See Fla. R. Jud. Admin. 2.330(f) (stating that the trial judge "shall not pass on the truth of the facts alleged"); *Shumpert v. State*, 703 So. 2d 1128, 1129 (Fla. 2d DCA 1997). So too is whether the trial judge is in fact biased or prejudiced against the movant or in favor of his or her opponent. See *Cave v. State*, 660 So. 2d 705, 708 (Fla. 1995) (quoting *Bundy v. Rudd*, 366 So. 2d 440, 442 (Fla. 1978)); *Livingston v. State*, 441 So. 2d 1083, 1087 (Fla. 1983). The question is solely whether the allegations of the sworn Motion, if true, establish that the movant has an objectively well-grounded fear that he or she will not receive a fair trial. If the answer is yes, the trial judge must disqualify himself.

Having determined that Judge Siegel should have granted the Defendant's Motion for Disqualification at first hand, the next question is whether his failure to do so requires that this Court reconsiders Judge Siegel's prior Orders of Denial entered in this case that were ruled subsequent to the Defendant's Motion for Recusal but prior to the DCA granting recusal. In other words, Orders of Denial that the judge entered any time after August 3, 2020.

The Defendant so believes because, as he shall explain, the error was not harmless in that, on this record, there is no reasonable possibility that the denial of the Motions in question did not deny the Defendant a fair hearing/ruling before a neutral judge. Additionally, it spares the parties and the Court the time, effort, and resources of conducting further proceedings—up to and including Postconviction Relief Motions/rulings—before a judge who, in the parlance of section 38.10 and rule 2.330(d), was supposed to "proceed no further" in the first place. See *Sutton*, 975 So. 2d at 1077 (noting that disqualification denials "should be immediately reviewable because [they can] be erroneously denied in numerous situations in which a trial by [a] biased judge should have been avoided altogether").

The requirement that a judge disqualify himself or herself when a litigant files a legally sufficient Motion is tied to the litigant's interest in having a fair trial before a neutral judge. See, e.g., *State v. Dixon*, 217 So. 3d 1115, 1117 (Fla. 3d DCA 2017) (tying ruling on a legally sufficient motion to disqualify to the proposition that "every litigant is entitled to nothing less than the cold neutrality of an impartial judge" (quoting *State ex rel. Davis v. Parks*, 194 So. 613, 615 (1939))); *Frengel*, 880 So. 2d at 764 (same).

Therefore, the following reasons below, are presented to this Court in support to the Defendant's request for reconsideration of prior rulings made by recused Judge Siegel:

The circumstances of this case strongly shows that the Defendant himself thought that he was not receiving a fair hearing/ruling by Judge Siegel. Due to this concern he sought for a timely Motion to Recuse. When this Motion was denied the Defendant filed a Writ of Mandamus during the time between the denial of his Disqualification Motion and the Judge's ruling on his Postconviction Motion. See *Lewis v. State*, 251 So. 3d 310, 311 (Fla. 2d DCA 2018) ("[T]here is no jurisdictional timeframe for the filing of a petition for writ of prohibition.").

However, after the judge denied the Defendant's Motion for Disqualification and because the Defendant thought that Judge Siegel's conduct with respect to those postconviction matters corroborated his alleged fear of bias and/or prejudice, he filed his Petition for Writ of Mandamus and he chose not to proceed the hearing with judge Siegel presiding over it.

The Defendant now challenges the legal correctness of both of these rulings in question, which Judge Siegel made on legal and evidentiary matters during the last four years he presided over the litigation of this Postconviction Motion. In fact, there is a history of appellate issues apart from the Motion for Disqualification that the Defendant has raised.

Nevertheless, the persistency and clear efforts to get Judge Siegel off the case before and after the denial of his Motion for Disqualification, combined with the multiple complaints against the Judge by way of public records, for example: newspaper articles written about Judge Siegel's demeanor toward this case; written complaints to the Chief Judge about Judge Siegel's bias against the Defendant; and the letter written to the Florida Governor with strong arguments in support of the Defendant being unjustly treated by recused Judge Siegel, are all good indicators that the Defendant in fact did not receive a fair hearing/ruling before a neutral judge.

It is the Defendant's position that an independent review and consideration of this case docket's history will confirm to this Court the reasonable possibility that the Defendant was denied a fair hearing/ruling. Judge Siegel made factual and legal findings, and rulings on Postconviction Motions which, as the Defendant alleges, went one way—all favorable to the State and none favorable to the defense. There appears to be instances of conduct and/or a clear pattern of rulings by Judge Siegel that clearly indicates bias and/or prejudice against the Defendant. In his Motion for Recusal the Defendant has identified multiple rulings and/or conduct by Judge Siegel

that indicates to this Court that he did not receive a fair hearing/ruling before a neutral judge. And the record of the Postconviction proceeding and rulings reflect unfair consideration of the defense's arguments and the disposition of his Motions. Specifically, taking into consideration the reckless and disregarded rulings made by Judge Siegel on the Defendant's "Second Amended Motion for Postconviction Relief" and subsequent "Motion for Rehearing."

It is worth mentioning also, that the Defendant's "Second Amended Motion for Postconviction Relief" was pending for almost 4 years before the State submitted its 467 pages "Response." Even though the Defendant and his pro bono DNA Consultant Tiffany Roy waited all this time to review, inspect and opine on the DNA evidence and reports submitted by the State, Judge Siegel Summarily Denied the Defendant's Motion two (2) days later! Nevertheless, the Defendant moved against the clock, in order to prepare and file a sufficient and timely Motion for Rehearing with Ms. Roy's independent DNA Report attached to the Motion. Even though Ms. Roy speedily submitted her own independent DNA Report, detailing her great concerns over the only alleged inculpatory evidence of this case, Judge Siegel Summarily Denied the Motion for Rehearing, completely disregarded the DNA expert's serious concerns about this evidence--without any record attachments refuting her concerns, and totally disregarded the Defendant's claim of "actual innocence" and his request for appointment of counsel.

Although the circumstances alleged in the Motion to Disqualify were sufficient to give the Defendant a reasonable fear about Judge Siegel's ability to conduct his hearing/ruling, they did additionally pose a substantial risk that the Defendant would have been denied a fair evidentiary hearing as well. With regard to Judge Siegel's familial relationship with the former prosecutor of this case, Dennis E. Siegel, there was never a direct answer from Judge Siegel in relation to the facts asserted. However, Mr. Dennis E. Siegel's only comment was "I am totally unaware of any familial or blood relationship of any type with Judge Siegel." This response leaves the possibility that a familial relationship still exists. This of course, seems likely to have affected the Defendant's right to a fair proceeding/ruling because Judge Siegel has ultimately presided over this case for the last 15 years. Put differently, these allegations would cast doubt on the Judge's ability to treat the Defendant's case fairly. Thus, these allegations too raise a material risk that Judge Siegel's presiding over this case for the last 15 years have been denying all along the Defendant's fair trial before a neutral judge.

Therefore, in the peculiar circumstances of this case, there is a reasonable possibility that the Defendant did not receive a fair hearing/ruling before a neutral judge. Accordingly, this Honorable Court should reconsider the currently pending Motions on their own independent merits.

MOTIONS TO BE RULED BY SUCCESSOR JUDGE

26. The filed Motions that are being presented for this Court to be ruled on are:

- a. "MOTION FOR A COURT ORDER COMPELLING THE BSO CRIME LAB TO RELEASE ALL DNA TESTINGS CONDUCTED IN THIS CASE (RFLP AND PCR) TO BE REVIEWED AND INSPECTED BY DEFENDANT'S DNA CONSULTANT, TIFFANY ROY"

This Motion was filed on or about March 5, 2019. The trial Court issued a Show Cause Order to the State on March 26, 2019. The State finally responded on September 1, 2020. And on September 8, 2020, the Defendant filed his reply.

However, on November 3, 2020, the Fourth District Court of Appeal entered an Order recusing Judge Andrew L. Siegel from this case. Thus, this Motion has been left out without a final ruling from the Court.

The Defendant respectfully moves this Honorable Court for a ruling on this Motion. There is a pro bono DNA consultant, Ms. Tiffany Roy, who has been awaiting for four (4) years for the requested evidence to be reviewed, inspected and tested. The Defendant cannot proceed any further with this Motion until there is a final Order from this Court.

- b. "MOTION TO PRESERVE ANY AND ALL EVIDENCE INTRODUCED AT TRIAL CONTAINING DNA AS WELL AS ALL FINGERPRINTS AND PALM PRINTS COLLECTED AT THE POINT OF ENTRY AND EXIT WHICH ARE CURRENTLY IN THE CUSTODY OF THE CLERK OF THE COURT'S EVIDENCE ROOM"

This Motion was filed on March 9, 2020 due to the recused Judge continuously grating the State's unnecessary delays in responding to his currently pending Motions, and, the State's failure to adequately address the releasing/retesting the DNA evidence--which is without doubt, raising the possibility of this evidence being at a higher risk of becoming moved, misplaced or lost. Additionally, these evidence could be equally destroyed (intentionally or inadvertently) due to the passage of time, the arrival of new personnel in the Clerk of Court's administration, etc. But most importantly of all, the Defendant relies solely and exclusively on the currently available DNA, fingerprints and palm prints evidence to prove his innocence.

However, on November 3, 2020, the Fourth District Court of Appeal entered an Order recusing Judge Andrew L. Siegel from this case. Thus, this Motion has been also left out without a final ruling from this Court.

The Defendant respectfully moves this Honorable Court for a ruling on this Motion. There is not a valid reason why the only alleged inculpatory evidence in this case should not be secured, protected and guaranteed. The Defendant cannot proceed any further with this Motion until there is a final Order from this Court.

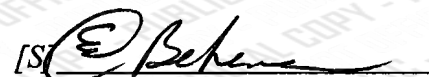
WHEREFORE, the Defendant prays this Honorable Court familiarizes itself with the case sub-judice, quashes the prior rulings by the recused Judge--which were entered while the judge was not authorized to entertain them, and instead reconsiders them on their own merits, and to please, promptly rule on the Defendant's currently pending Motions which have not been ruled yet.

Respectfully Submitted,


Ernesto Behrens, pro se

OATH

UNDER PENALTIES OF PERJURY and administrative sanctions from the Department of Corrections, including forfeiture of gain time if this Motion is found to be frivolous or made in bad faith. I certify that I understand the contents of the foregoing Motion, that the facts contained in the Motion are true and correct, and that I have a reasonable belief that the Motion is timely filed. I certify that this Motion does not duplicate previous motions that have been disposed of by the court. I certify that I understand English and have read the forgoing Motion or had the Motion read to me. I further certify that this Motion and its statements are made in good faith.


Ernesto Behrens, DC# 732564

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Motion for Reconsideration was served by U.S. Mail to: The Office of the State Attorney at 201 S.E. Sixth Street, Fort Lauderdale, Florida 33301; to the Honorable Chief Judge Jack Tuter and to **the successor Judge to be assigned to the case** at Broward County Main Courthouse, 201 S.E. Sixth Street, Fort Lauderdale, Florida 33301 (*in compliance with Florida Rule of Civil Procedure 1.080*). On this 17 day of November, 2020.

[S] 

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