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S.A. CASE NO.: 21CF061633AN IN THE CIRCUIT COURT OF THE FOURTH

JUDICIAL CIRCUIT, IN AND FOR NASSAU

COUNTY, FLORIDA

CLERK NO.: 21CF885

DIVISION: CRB

STATE OF FLORIDA

VS.

WILLIAM CONWAY BROYLES

## NOTICE OF INTENT TO SEEK DEATH PENALTY AND NOTICE OF AGGRAVATING FACTORS

The State of Florida, by and through the undersigned Assistant State Attorney, does hereby give notice to the Defendant in this case, pursuant to Florida Statute 782.04(b), that the State of Florida intends to seek the death penalty for all three First Degree Murders charged in this case.

The applicable statutory aggravating circumstances, as set forth in Florida Statute 921.141, are as follows:

- (b) The defendant was previously convicted of felonies involving the use or threat of violence to the person. (Three counts of first degree murder).
- (i) The capital felonies were homicides and all were committed in a cold, calculated, and premeditated manner without any pretense of moral or legal justification.
- (m) The victim of the capital felony was particularly vulnerable due to advanced age or disability, or because the defendant stood in a position of familial or custodial authority over the victim. (Count 2)

The State of Florida requests that the Defendant provide the State of Florida with a statement of particulars listing the statutory and non-statutory mental mitigating circumstances the Defendant expects to establish through expert testimony and the names and addresses of the mental health experts by whom the Defendant expects to establish these mitigating circumstances. The Court has authority to require the Defendant to disclose all mitigating factors pursuant to State v. Steele, 921 So.2d 538 (Fla. 2005).

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Notice has been furnished by email to Richard Kuritz, this 27th day of January, 2022.

MELISSA W. NELSON STATE ATTORNEY

By: /s/ Alan Seth Mizrahi Bar Number 122300 Assistant State Attorney

e-Service Address

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