No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

ALBERT D. BELL,
Petitioner,

v.

STATE OF ARKANSAS,
Respondent.

On Petition for a Writ of Certiorari to the Supreme Court of Arkansas

PETITION FOR WRIT OF CERTIORARI AND APPENDIX

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QUESTION PRESENTED

The question presented is:

Does imposing a life without parole sentence on a juvenile who neither killed nor intended to kill but who was convicted of felony murder violate the Eighth and Fourteenth Amendments?

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PETITION FOR A WRIT OF CERTIORARI

Albert D. Bell respectfully petitions for a writ of certiorari to review the judgment of the Arkansas Supreme Court.

OPINIONS BELOW

The opinion of the Arkansas Supreme Court, Pet. App. 1, is not reported. It is available at *Bell v. Arkansas*, 2015 WL 5895447, No. CR-15-367 (Oct. 8, 2015).

JURISDICTION

The judgment of the Arkansas Supreme Court was entered on October 8, 2015. On December 15, 2015, Justice Alito extended to and including February 5, 2016, the time for filing this petition for a writ of certiorari. This Court has jurisdiction under 28 U.S.C. § 1257(a).

RELEVANT STATUTORY PROVISIONS

The Appendix to this Petition reproduces the State of Arkansas's relevant criminal and sentencing statutes.

RELEVANT CONSTITUTIONAL PROVISIONS

The Eighth Amendment to the United States Constitution provides: "Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted."

The Fourteenth Amendment to the United States Constitution provides in relevant part: "[N]or shall any State deprive any person of life, liberty, or property, without due process of law...."

STATEMENT OF THE CASE

A child who commits robbery cannot be sentenced to life without parole. *Graham v. Florida*, 560 U.S. 48 (2010). Indeed, this Court held in *Graham* that the Constitution forbids sentencing any juvenile to life without parole for a non-homicide offense. *Id.* at 82.

Albert Bell has spent the last twenty-three years incarcerated for his role in a robbery that ended in two deaths because of another's acts. *See Bell v. Arkansas*, 920 S.W.2d 821, 822 (Ark. 1996). The State of Arkansas insists that Bell should spend the rest of his life in prison. In other words, because of a horrible decision he made at the age of sixteen to participate – unarmed – in a robbery, Albert Bell could spend seventy or more years in prison for a crime that did not require any finding of intent to kill. Under Arkansas law, Bell will have no chance to prove to a parole board that the person he is today is not who he was as a child. He will have no chance to show what current brain science tells us is almost certain: that he has matured, developed a true sense of self, and should be given an opportunity to redeem himself to society.

In *Graham* and *Miller v. Alabama*, 132 S. Ct. 2455, 2475 (2012), this Court held, respectively, that the Eighth and Fourteenth Amendments prohibit sentencing juveniles to life without parole for non-homicide offenses under any circumstances or for homicide offenses under mandatory sentencing schemes. The Court has yet to address whether the

Constitution allows life without parole for juveniles convicted of felony murder, where the felony is identical to a crime for which a sentence of life without parole is unconstitutional. That question will need to be resolved by this Court, as states continue to sentence juveniles convicted of felony murder to life without parole. The logic of *Roper v. Simmons*, 543 U.S. 551 (2005), *Graham*, and *Miller*, along with additional precedent distinguishing felony murder from other crimes for sentencing purposes, commands the conclusion that the Constitution forbids states from imposing life without parole on juveniles convicted of felony murder who neither killed nor intended to kill.

A. Factual Background

A few months after his sixteenth birthday, Albert Bell participated in a robbery. He entered Cloud's Grocery Store in Casscoe, Arkansas, unarmed and without any intent to harm or kill. During the robbery, another teenager, Terry Sims, killed two people. *Bell*, 920 S.W.2d at 822. The State of Arkansas charged Bell with two counts of capital felony murder and tried him as an adult. *Id.* A jury convicted Bell of two lesser-included offenses of first degree felony murder. *Id.* Under Arkansas law, to convict under the felony murder statute, the State did not need to prove Bell intended to kill or harm. Pet. App. 005. After the jury failed to agree on a sentence, the trial court imposed the harshest punishment available: life without parole.

B. Relevant Lower Court Proceedings

In 2010, Bell filed a petition for recall and resentencing following this Court's decision in *Graham*. *Bell v. Arkansas*, 2011 Ark. 379. The trial court denied the petition

and the Arkansas Supreme Court affirmed, reasoning that Bell was convicted of a homicide offense and that *Graham* was therefore inapplicable. *Id.*

In 2015, Bell filed a pro se petition under Arkansas Code § 16-90-111 to correct his illegal and unconstitutional sentence. Pet. App. 002. Bell's petition argued that his sentence violated the Eighth and Fourteenth Amendments by denying him a meaningful opportunity to demonstrate to a parole board his rehabilitation. The trial court denied the petition on procedural grounds. *Id.* The Arkansas Supreme Court disagreed with the trial court's decision to deny the petition for procedural flaws, and instead held that Bell's constitutional claims failed for the reasons the court articulated when it denied his 2010 petition. Pet. App. 003.

REASONS FOR GRANTING THE WRIT

I. THE COURT SHOULD GRANT REVIEW TO DECIDE THE QUESTION LEFT UNRESOLVED BY *GRAHAM* WHETHER A STATE VIOLATES THE EIGHTH AND FOURTEENTH AMENDMENTS BY IMPOSING A LIFE WITHOUT PAROLE SENTENCE ON A JUVENILE CONVICTED OF FELONY MURDER WHO DID NOT KILL OR INTEND TO KILL

The Court in *Graham* held that Florida's decision to impose a life without parole sentence on Graham following his robbery conviction violated the Constitution. 560 U.S. 48. The same actions that gave rise to Graham's conviction brought Albert Bell a life without parole sentence. But Bell's culpability, like Graham's culpability, extends only as far as the facts and the mens rea requirements will take it. Under the relevant Arkansas statute, the State did not have to prove that Bell had intent to kill. Pet. App. 005. Bell is currently serving a life without parole sentence because of the decision he made to participate in a robbery, the actions of another person, and the manner in which

Arkansas has defined the crime of felony murder. The "transferred intent" notion on which felony murder statutes rely cannot stand as a sufficient basis for sentencing Bell to life without parole. In other words, Bell's sentence, like that of Graham for the same underlying offense, also violates the Constitution.

In *Roper*, the Court charted a new course for the nation's understanding of the constitutional limits to juvenile sentencing. In that case, citing scientific studies showing that adolescent brain structures and functioning leave teenagers inherently "less culpable," 543 U.S. at 571, and "less deserving of the most severe punishments" than adults, *Graham*, 560 U.S. at 68, the Court invalidated the death penalty for people convicted of crimes committed as juveniles.

The Court followed that same logic in *Graham*, holding that, for juvenile offenders who committed non-homicide offenses, imposing life imprisonment with no possibility of release constituted categorically cruel and unusual punishment. 560 U.S. at 82. Furthermore, in *Graham*, the Court correctly linked the punishment of life without parole to a death sentence, recognizing that life without parole "alters the offender's life by a forfeiture that is irrevocable. It deprives the convict of the most basic liberties without giving hope of restoration . . . ." *Id.* at 69–70.

The Court held in *Miller* that statutory schemes mandating life imprisonment without parole for juveniles violate the Eighth and Fourteenth Amendments. 132 S. Ct. at 2475. Justice Breyer, in his concurring opinion, recognized that the logic of *Graham* requires the Court to invalidate life without parole sentences for juveniles lacking intent to kill. He wrote, "Given *Graham*'s reasoning, the kinds of homicide that can subject a

juvenile offender to life without parole must exclude instances where the juvenile himself neither kills nor intends to kill the victim" because "where the juvenile neither kills nor intends to kill, both features [youth and lack of intent] emphasized in *Graham* as extenuating apply." 132 S. Ct. at 2475-76 (Breyer, J., concurring).

Finally, in January of this year, the Court held that *Miller* imposed a substantive rule, requiring retroactivity, and stated that *Miller* "established that the penological justifications for life without parole collapse in light of the distinctive attributes of youth." *Montgomery v. Louisiana*, 577 U.S. __ (slip op., at 16) (internal quotations omitted). In fact, the Court held in *Montgomery* that "*Miller* determined that sentencing a child to life without parole is excessive for all but the rare juvenile offender whose crime reflects irreparable corruption." *Id.* at __ (slip op., at 17). Thus, the Court stated, *Miller* means that even in cases involving homicides, a sentence of life without parole still violates the Eighth Amendment for a child whose crime reflects "'unfortunate yet transient immaturity.'" *Id.* at __ (slip op., at 16-17).

Albert Bell's sentence of life without parole violates the Eighth and Fourteenth Amendments because he neither killed nor intended to kill. He committed a robbery and intended only to commit a robbery. His crime reflects "unfortunate yet transient immaturity," and Arkansas must afford him an opportunity to show his redemption.

A. The Court's Reasoning in *Roper*, *Graham*, and *Miller* Requires the Conclusion that Sentencing Juveniles Who Did Not Kill to Life Without Parole Violates the Eighth and Fourteenth Amendments

1. *The Court Should Follow The Logic of its Previous Holdings and Create a Categorical Rule Forbidding Life Without Parole Sentences for Juveniles Who Did Not Kill or Intend to Kill*

Striking, and constitutionally significant, differences between adolescents and adults explain why "juvenile offenders cannot with reliability be classified among the worst offenders." *Roper*, 543 U.S. at 569. In its recent juvenile sentencing jurisprudence, the Court relied on scientific studies showing that juveniles are undeveloped personalities, who are labile and situation-dependent, more vulnerable to negative influences and outside pressures, and largely lacking in impulse controls that almost all of them will gain later in life. *Id.* at 569–70.

The Court first recognized and incorporated these principles into its constitutional analysis in the death penalty context in *Roper*. *Id.* Later, in *Graham*, the Court extended the logic to life imprisonment without parole because of the similarity between these two punishments. 560 U.S. at 82. The Court concluded, "Life without parole is the second most severe penalty permitted by law," *id.* at 69 (quoting *Harmelin v. Michigan*, 501 U.S. 957, 1001 (1991) (opinion of Kennedy, J.), and, indeed, "shares some characteristics with death sentences that are shared by no other sentences." *Id.* Furthermore, the Court looked to the practical consequences of life without parole, labeling it an "especially harsh punishment for a juvenile" as that offender will serve "more years and a greater percentage of his life in prison than an adult offender." *Id.* at 70. For this reason, the Court adopted a categorical approach to assessing juvenile life without parole and

concluded that, at least with regards to non-homicide offenses, such a severe punishment violated the Eighth and Fourteenth Amendments.

The Court's decision to reject a case-by-case method to sentencing and instead adopt a categorical approach to assessing the death penalty and life without parole further supports concluding that Bell's sentence violates the Constitution. The Court doubted that "taking a case-by-case proportionality approach could with sufficient accuracy distinguish the few incorrigible juvenile offenders from the many that have the capacity for change." *Graham*, 560 U.S. at 77. In fact, the Court in *Roper* directly rejected the argument that juries need only consider a juvenile's age as a mitigating factor in sentencing, concluding that an "unacceptable likelihood exists that the brutality or cold-blooded nature of any particular crime would overpower mitigating arguments based on youth as a matter of course." 543 U.S. at 573.

The Court applied the same rationale in *Graham*, even though the case involved a robbery, not a brutal or cold-blooded crime. Of course, the risks recognized in *Roper* are even more pronounced in a robbery case involving a death than they were in *Graham*, and the reasoning therefore applies with at least equal force here.

In addition, the Court rejected a case-by-case approach in *Roper* and *Graham* because of the "special difficulties encountered by counsel in juvenile representation," *Graham*, 560 U.S. at 78, precisely because of the characteristics that differentiate juveniles from adults. Juveniles work less effectively with adults, have difficulty weighing long-term consequences, and mistrust defense counsel. *Id.* These facts "impair the quality of a juvenile defendant's representation," *id.*, increasing the risk that a jury

would mistakenly conclude that a particular juvenile defendant is as culpable as an adult. A categorical rule prevents that risk from taking root.

Furthermore, the Court recognizes that juveniles should be given the "opportunity to achieve maturity of judgment and self-recognition of human worth and potential." *Id.* at 79. In *Roper*, the states deprived juveniles of that possibility through execution. But in *Graham*, the Court expressed the same concern. "Life in prison without possibility of parole gives no chance for fulfillment outside prison walls, no chance for reconciliation with society, no hope." *Id.* Life without parole sentences disincentive this growth, maturing, and redemption—often with the prison system complicit in the lack of personal development. *Id.* Thus, as the Court implicitly acknowledged in *Graham*, it does not solve the problems addressed in *Roper* to simply allow states to sentence those same juvenile defendants to life without parole. All juveniles should be given the opportunity discussed in *Roper* and *Graham* to achieve the maturity that "can lead to that considered reflection which is the foundation for remorse, renewal, and rehabilitation." *Id.*

2. *Sentencing Juveniles Convicted of Felony Murder to Life Without Parole Poses Particular Constitutional Concerns*

The Court has already held that the Constitution forbids treating individuals convicted of felony murder as identical to those who did, or intended to, kill. In *Enmund v. Florida*, 458 U.S. 782, 797, 801 (1982), the Court held that a state cannot impose the death penalty on an individual who "aids and abets a felony in the course of which a murder is committed" if the individual "did not commit and had no intention of committing or causing" the murder. The Court reaffirmed this principle in *Tison v.*

Arizona, 481 U.S. 137, 158 (1987), when in held that the death penalty cannot be imposed on a "minor in [a felony]...who neither intended to kill nor was found to have had a culpable mental state." As discussed above, both *Graham* and *Miller*, "liken[ed] life-without-parole sentences imposed on juveniles to the death penalty itself." *Miller*, 132 S. Ct. at 2466. As such, it is appropriate to draw the same line with regards to juvenile life without parole that the Court already has drawn with regard to the death penalty.

Indeed, it is impossible to reconcile Bell's sentence with *Roper*, *Graham*, and *Miller*. In *Roper*, the Court found that the characteristics of youth make juveniles less culpable than adults and therefore held that, "[w]hen a juvenile offender commits a heinous crime, the State can exact forfeiture of some of the most basic liberties, but the State cannot extinguish his life and his potential to attain a mature understanding of his own humanity." 543 U.S. at 573-74. The Court extended that reasoning to life without parole sentences for juveniles convicted of non-homicide offenses. 560 U.S. at 68. And in *Miller*, the Court recognized that "*Graham*'s reasoning implicates any life-without-parole sentence imposed on a juvenile." 132 S. Ct. at 2465.

These cases, taken together, should be read as prohibiting states from sentencing any juvenile to life without parole for felony murder when that child has not been shown to have killed or intended to kill. Bell's culpability for his crime is identical to that of Graham. The only difference between them is the horrible actions taken by Bell's accomplice – actions unrelated to Bell's intent. For these reasons, the notion of "transferred intent" underlying Arkansas's felony murder statute "is not sufficient to

satisfy the intent to murder that could subject a juvenile to a sentence of life without parole" because "this artificially constructed kind of intent does not count as intent for purposes of the Eighth Amendment." *Miller*, 132 S. Ct. at 2476 (Breyer, J., concurring).

In sum, the logic underpinning the Court's most recent juvenile sentencing cases, along with the Court's felony murder jurisprudence, requires the conclusion that sentencing a juvenile who did not kill or intend to kill to life without parole violates the Constitution.

3. *No Punishment Theory Justifies Sentencing Juveniles to Life Without Parole*

In *Graham*, the Court also concluded that none of the recognized legitimate penological goals of sentencing adequately justify life without parole for juvenile non-homicide offenders. 560 U.S. at 71–74. The same is true for Albert Bell, who neither intended to kill nor killed.

As in *Roper*, the Court in *Graham* recognized that deterrence "does not suffice to justify [juvenile life without parole.]" *Id.* at 72. Juveniles lack maturity and possess an "underdeveloped sense of responsibility," *id.*, meaning that they rarely take into account a possible punishment before acting. Thus, life without parole likely deters few, if any, juveniles.

The incapacitation goal – also rejected by the Court in *Graham* – addresses the desire to prevent recidivism. *Id.* A basic flaw exists in trying to rely on this goal to justify juvenile life without parole. "To justify life without parole on the assumption that the juvenile offender forever will be a danger to society requires the sentencer to make a

judgment that the juvenile is incorrigible." *Graham*, 560 U.S. at 72. Given the characteristics of youth, such a judgment is "questionable" *Id.* at 73. A state cannot justify making such a decision at the outset, rather than by allowing a parole board to consider that issue many years after the crime.

Rehabilitation, another generally legitimate goal, forms the basis of the parole system. A sentence of life without parole "forswears altogether the rehabilitative ideal" and, in fact, inhibits it. *Id.* at 74.

Thus, the state is left with only the retribution goal to justify its imposing life without parole on a juvenile. While the state may undoubtedly seek to punish a juvenile for his crime, "[t]he heart of the retribution rationale is that a criminal sentence must be directly related to the personal culpability of the criminal offender." *Id.* at 71 (quoting *Tison v. Arizona*, 481 U.S. 137, 149 (1987)). For all the reasons discussed above about the characteristics of youth, "the case for retribution is not as strong with a minor as with an adult," *Miller*, 132 S. Ct. at 2465 (quoting *Graham*, 560 U.S. at 70). In short, juvenile offenders are not as culpable as adults, and that is especially true in the case of felony murder. Life without parole to a juvenile is the near equivalent of a death sentence and is a harsher penalty for juveniles than it is for adults. Because of their lessened culpability, retribution cannot justify sentencing juveniles convicted of felony murder to life imprisonment without parole.

B. Evolving Standards of Decency Show that Juvenile Life Without Parole Constitutes Cruel and Unusual Punishment

In addition to the considerations discussed above, to assess whether a sentence constitutes "cruel and unusual" punishment under the Eighth Amendment, the Court turns to "evolving standards of decency that mark the progress of a maturing society." *Estelle v. Gamble*, 429 U.S. 97, 102 (1976) (quoting *Trop v. Dulles*, 356 U.S. 86, 101 (1958) (plurality opinion)). When deciding whether to create a categorical rule against a particular practice, the Court considers "objective indicia of society's standards, as expressed in legislative enactments and state practice." *Roper*, 543 U.S. at 563. Evolving standards of decency, as demarked through legislative enactments, state practices, and international rules and norms, show that juvenile life without parole for felony murder violates the Eighth Amendment's notion of cruel and unusual punishment.

At the time the Court decided *Graham*, six jurisdictions banned juvenile life without parole sentences in all circumstances and seven states permitted the punishment, but only for homicide crimes. *Graham*, 560 U.S. at 62. Now, fourteen states ban juvenile life without parole.[1] Moreover, two states require sentencing review for nearly

[1] Alaska Stat. Ann. § 12.55.125 (West 2015); Colo. Rev. Stat. Ann. §17-22.5-104(IV) (West 2015); Del. Code Ann. tit. 11, §4209 (West 2013); D.C. Code § 22-2104 (2013); Haw. Rev. Stat. § 706-656 (West 2015); Kan. Stat. Ann. §21-6618 (West 2015); *Workman v. Commonwealth*, 429 S.W.2d 374 (Ky. 1968); Mass. Gen. Laws ch. 265 § 2 (West 2014); Mont. Code Ann. § 46-18-222 (West 2015); 2015 Nev.A.B. 267 (2015); N.M. Stat. Ann. §§ 32A-2-20, 31-21-10 (West 2009); Or. Rev. Stat. Ann. § 161.620 (West 2015); Tex. Fam. Code Ann. § 54.04 (West 2013); W. Va. Code Ann. § 61-11-23 (West 2014); Wyo. Stat. Ann. § 6-10-301 (West 2015).

all juvenile homicide cases,[2] and North Carolina and Pennsylvania recently banned juvenile life without parole for felony murder.[3]

The movement is more pronounced than even those numbers suggest. In just the three years since the Court decided *Miller*, nine states abolished juvenile life without parole.[4] The histories in many of those states show that the legislatures acted, at least in part, because they believed that the punishment violated the Eighth and Fourteenth Amendments.[5] The Court should consider those numbers to show not only society's evolving standards, but also that a number of states have abolished the practice of sentencing juveniles to life without parole because it violates the Constitution.

The Court relied on a similar legislative trajectory in *Atkins v. Virginia*, 536 U.S. 304 (2002), to invalidate the death penalty for those with mental disabilities. Moreover, in *Roper* and *Graham*, even less legislative movement existed to show an evolving

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[2] Fla. Stat. § 775.082; Cal. Penal Code § 1170; Cal. Penal Code § 3051.
[3] N.C. Gen. Stat. § 15A—1340.19A; 18 Pa. C.S.A. § 1102.
[4] The nine states that abolished the sentence for juveniles since *Miller* are Connecticut, Delaware, Hawaii, Massachusetts, Montana, Nevada, Oregon, Texas, and Wyoming.
[5] Conn. Judiciary Committee, Joint Favorable Report (Conn. 2015) (stating the purpose of the bill is to "ensure Connecticut's juvenile sentencing structure is constitutional"); H.B. 2116, 27th Leg., Reg. Sess. (Haw. 2014) (citing to *Roper v. Simmons*, 125 S. Ct. 1183 (2005), and *Graham v. Florida*, 130 S. Ct. 2011 (2010) to show juveniles do not meet the penological goals of the harshest punishments); *Diatchenko v. District Attorney for Suffolk Dist.*, 1 N.E.3d 270, 284–85 (Mass. 2013) (holding "the unconstitutionality of this punishment arises not from the imposition of a sentence of life in prison, but from the absolute denial of any possibility of parole"); Tex. House Research Org., Bill Analysis, S. 81, Reg. Sess., at 3 (2009) (finding "juveniles cannot reliably be classified as among the worst offenders" and "[t]he criminal justice system is designed to treat juveniles differently than adults"); Testimony in Support of H. 62 Before the Vt. H. Judiciary Comm., 2014 Leg. 1, 3 (Vt. 2014) (testimony of James L. Dold, Advocacy Director for The Campaign for the Fair Sentencing of Youth) (arguing children are "constitutionally different from adults [and] should not be subject to our nation's harshest punishments").

standard with regards to the punishments at issue there. Nevertheless, the Court held that evolving standards worked against the juvenile death penalty and life without parole for non-homicide offenses.

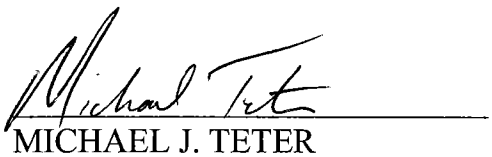
Finally, the Court has long considered the judgments of other nations, and the international community generally, in assessing the constitutionality of punishments. *See, e.g.*, *Graham*, 560 U.S. at 80; *Atkins*, 536 U.S. at 316–17 n.21; *Thompson v. Oklahoma,* 487 U.S. 815, 830 (1988) (plurality opinion); *Enmund v. Florida*, 458 U.S. 782, 796–97 n.22 (1982); *Coker v. Georgia*, 433 U.S. 584, 596 n.10 (1977) (plurality opinion); *Trop v. Dulles*, 356 U.S. 86, 102–03 (1958) (plurality opinion). Such a review serves not to replace the Court's own view, but to confirm the Court's "independent conclusion that a particular punishment is cruel and unusual." *Graham*, 560 U.S. at 80. As discussed in *Graham*, the international community speaks with one voice here. *Id.* at 80–81. Every nation besides the United States and Somalia has ratified Article 37(a) of the United Nations Convention on the Rights of the Child, which prohibits imposing "life imprisonment without possibility of release . . . for offenses committed by persons below eighteen years of age." *Id.* at 81.

Furthermore, only ten other countries have laws allowing juveniles to be sentenced to life without parole, but even that number is misleading. de la Vega & Leighton, *Sentencing Our Children to Die in Prison: Global Law and Practice*, 42 U.S.F. L. Rev. 983, 989 (2008). Researchers have not been able to identify any person in those countries actually serving a juvenile life without parole sentence. *Id.* at 990, 1004–07.

CONCLUSION

For the foregoing reasons, the petition for a writ of certiorari should be granted.

Respectfully submitted,



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