

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA, IN AND FOR PASCO COUNTY

STATE OF FLORIDA,

Plaintiff,

v.

CASE NO.: 2014CF005586CFAXWS

ADAM MATOS,

Defendant.

PROCEEDINGS: PENALTY PHASE - Excerpt
Defense closing argument

DATE: November 21, 2017

BEFORE: THE HONORABLE MARY HANDSEL
Circuit Judge
Sixth Judicial Circuit
New Port Richey, Florida

PLACE: West Pasco Judicial Center
7530 Little Road
New Port Richey, FL

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1 P R O C E E D I N G S

2 * * * * *

3 (Thereupon, proceedings were reported but not
4 requested as part of this transcript.)5 THE COURT: All right. Defense, are you ready
6 to proceed?

7 MR. PURA: Yes, ma'am.

8 THE COURT: All right. You may proceed.

9 MR. PURA: He's the nicest kid you could ever
10 meet. Everything about him is awesome. Just
11 awesome.12 Ladies and gentlemen, but for Adam Matos's
13 love for his son [REDACTED], none of this would have
14 ever happened and we would not be here today.15 I want to talk about subjects that I discussed
16 with all of you, it seems like such a long time ago
17 now, doing jury selection. First, about the
18 differences between the guilt phase of the trial,
19 which obviously you've already completed, and the
20 penalty phase which obviously we are in now.21 During the guilt phase you were instructed to
22 make factual determinations about whether the State
23 has proven the essential elements of the charge.
24 And you were instructed that if you found A plus B
25 plus C, then you must find D. In other words, if

1 you find that, A, the victim is dead; B, the
2 defendant killed the victim; and, C, he did it in a
3 premeditated fashion, then you must find him guilty
4 of premeditated murder. There's no discretion in
5 that decision and your determinations on the
6 elements of the charges had to be unanimous.

7 And in the process of reaching unanimity, it
8 was perfectly to be expected that you may disagree
9 over some of the facts, over some of the evidence
10 and that you would argue over the facts. Was this
11 witness credible? Did the State prove this? And
12 if you could not have agreed on any of the elements
13 of the charge, then you would have had -- you would
14 have been hung and the Judge would have declared a
15 mistrial and another jury down the road would have
16 had to start all over again on the case.

17 Contrast that with the penalty phase that
18 we're in now. The ultimate decision on which is
19 the appropriate punishment, death or life without
20 the possibility of parole, is a moral decision not
21 a factual decision.

22 It is a moral decision that you are to make
23 individually based on your individual moral
24 judgment, based on your unique life experience.
25 And nobody expects you to agree with the other

1 jurors in making this moral decision because it is
2 a decision that you will have to live with the rest
3 of your lives. And no one can tell you what
4 decision -- what's the right decision to make.
5 Only you can decide the right decision for you to
6 make.

7 And during the penalty phase there is no such
8 thing as a hung jury. Once any one or more of you
9 decide that life is the appropriate sentence, then
10 you have reached a verdict as a jury and life will
11 be the sentence.

12 Now, you were all picked because you all said
13 that you could follow the law. And what is the law
14 as it applies to this part of the trial? The law
15 never requires the death penalty verdict. The law
16 is always satisfied with a life sentence. It never
17 requires a death penalty verdict, not in this case,
18 not in any case, not in the worst case you can
19 imagine.

20 The Judge has no dog in that fight. She'll be
21 satisfied with whatever decision you make.

22 As Mr. Sarabia made it abundantly clear when
23 he was questioning Adam Matos, they are the ones
24 who want to kill him.

25 Not only is the law satisfied always with a

1 life verdict, I would argue that the law favors
2 life. Because before you get to the point where
3 you decide whether death is appropriate, you have
4 to be unanimously convinced beyond a reasonable
5 doubt that the State has proven the aggravators,
6 that the aggravators are sufficient to warrant the
7 death penalty, and that the aggravators outweigh
8 the mitigating circumstances. But each of you
9 individually decide what weight to give to any
10 aggravator or mitigating circumstances and weighing
11 them against each other is not a mathematical or a
12 mechanical process. These are the steps you have
13 to take to even get to the point where the
14 defendant is eligible to be considered for the
15 death penalty. These are the hoops that you have
16 to jump through just to get to the point where you
17 make the final decision, the final moral decision
18 individually based on your individual moral
19 judgments.

20 But on the other hand, choosing life is a
21 one-step process. If any of you decide that a
22 mitigating circumstance exists which makes life the
23 appropriate sentence, then you have given that
24 mitigating circumstance the weight of life. And it
25 could be for any reason that you believe makes life

1 the appropriate sentence. It can be simply based
2 on your sense of mercy. And even if you're the
3 only one to decide that, the jury has done its job.
4 You as a jury have made a decision and the verdict
5 is life.

6 Adam Matos is entitled to have 12 individual
7 verdicts based on 12 individual, separate moral
8 judgments. Therefore, I would argue that not only
9 does the law never require the death penalty, it
10 favors life.

11 You were all selected because you said that
12 the death penalty would not be necessarily
13 automatic for someone who's found guilty of four
14 counts of first-degree premeditated murder. You
15 all said that before making the final determination
16 on the appropriate sentence you would want to know
17 more.

18 And we talked about what kind of things that
19 you would want to know more about, and you
20 basically said that you want to know more about the
21 defendant's background and about circumstances
22 leading up to the murders and that is what has been
23 shown to you. You got information about Adam
24 Matos's background, and the of circumstances
25 leading up to the murders.

1 Mitigation is, as I said, any reason to choose
2 life and it could be just based simply on your
3 sense of mercy. And you don't have to explain
4 yourself to anybody. Agreeing to disagree is
5 perfectly legitimate in the penalty phase of this
6 trial.

7 You were also chosen because each of you said
8 that you can make a moral decision between life and
9 death and not allow yourselves to be unduly
10 influenced by others. Because you said that you
11 would respect the moral decisions of your fellow
12 jurors and expect that they would return the
13 respect and treat your moral decision with respect
14 and dignity. You would not expect 12 strangers to
15 unanimously agree on the moral decisions that that
16 you make in your lives: Where to worship, whether
17 to have children, how to raise your children.

18 Again, Adam Matos is entitled to 12 individual
19 verdicts based on 12 unique walks of life. If any
20 one of you decides to choose life, then life is the
21 verdict.

22 You do not have to put up with any
23 intimidation or any bullying in reaching your
24 decision. You do not have to out debate anybody.
25 You can simply say, "I've made up my mind. We're

1 going home. We as a jury have reached a verdict
2 because I have made up my mind." And the jury will
3 have done its job.

4 Now, let me talk about the aggravating factors
5 that were presented to you.

6 "Previous conviction prior violent felony."

7 Okay. The plain language would lead one to
8 believe that that refers to something that happened
9 in the past unrelated to these crimes. But the law
10 allows it to be applied to a situation in which
11 there are multiple victims. So the State has
12 proven that aggravator; it is, of course, up to you
13 to give it weight, if any.

14 "Especially heinous, atrocious and cruel."

15 I'm going to repeat the language to you
16 because it's really extreme -- extreme language.

17 "Extremely wicked, shockingly evil, outrageously
18 wicked and vial, designed -- designed to inflict a
19 high degree of pain, with utter indifference to or
20 even enjoyment of the suffering of others."

21 The violent killing of another human being
22 whether by gunshot, knife or a hammer is never
23 pretty. It's always ugly. But the kind of crime
24 they're talking about as being especially heinous,
25 atrocious and cruel is one accompanied by

1 additional facts, additional acts that show that
2 the crime was conscienceless or pitiless and was
3 unnecessarily torturous.

4 As horrific as the murders of Greg Brown,
5 Margaret Brown, Megan Brown and Nicholas Leonard
6 were, they were not unnecessarily torturous. Greg
7 Brown and Megan Brown died instantly from gunshots.
8 The State has not proven otherwise beyond a
9 reasonable doubt. Nicholas Leonard and Margaret
10 Brown were most likely rendered unconscious by the
11 first blow. Dr. Palma was not able to say whether
12 or not the first blows rendered them unconscious,
13 so the State, therefore, has not proven that they
14 suffered. They have not proven that they were
15 tortured.

16 In no way am I intending to minimize the
17 violence and the bloodshed Adam Matos wreaked upon
18 the Browns and Mr. Leonard. I'm only saying that
19 the State has failed to prove beyond a reasonable
20 doubt that they were unnecessarily tortured.

21 And the bottom line regarding the aggravators
22 is if you decide that the State has proven one or
23 more aggravator and if you decide that they
24 outnumber the mitigators -- the mitigating
25 circumstances, and even if you decide that they

1 outweigh the mitigating circumstances, you can
2 still choose life.

3 The process of finding and weighing
4 aggravators versus mitigators is not mechanical or
5 mathematical and it does not dictate your final
6 decision on whether Adam Matos deserves to die. If
7 you have any doubt about that, I assure you the
8 State would have just objected and Her Honor would
9 have corrected me.

10 We talk about mitigating circumstances. When
11 you talk about mitigating circumstances that arose
12 during the guilt phase of the trial, you have all
13 found beyond a reasonable doubt that Adam Matos
14 acted in a premeditated fashion. Okay. We respect
15 your decision.

16 You heard the definition of "premeditation".
17 There's no time requirement involved. It can be
18 somebody could develop the intent to kill in a
19 matter of seconds. There just has to be time
20 enough for the person to be able to reflect before
21 carrying out his deed. But one thing is for
22 certain, Adam Matos did not plan to kill anybody.
23 This was a spontaneous act. He could have waited.
24 If he wanted -- if he were planning on killing
25 somebody, he could have waited for a more opportune

1 time. For example, to when he had a chance to cash
2 his payroll check and he would have some money on
3 him so he could make his getaway. He didn't do
4 that because he had no plan to kill anybody. He
5 could have waited until he had an opportunity to
6 arm himself before going back to the house. He
7 didn't do that. He had no plan to kill anybody.
8 He tossed the riffles into the canal just outside
9 the house. The diver stepped on the rifle before
10 he even submerged himself in the water. Adam Matos
11 had no plan.

12 MR. LABRUZZO: Judge, we're going to object.

13 THE COURT: Approach.

14 (BENCH CONFERENCE.)

15 MR. LABRUZZO: Judge, my objection is it's an
16 improper argument at this time in the penalty
17 phase. All the last three points that the Defense
18 has made really go to the issue of premeditation
19 and it sounds as though he's arguing that the
20 murders were not done in a premeditated fashion,
21 and, therefore, is trying to imply to the jury some
22 sort of lingering doubt as to whether or not it was
23 murder in the first degree.

24 You know, I gave him the opportunity to see
25 where he was going with it. He did not outline how

1 those facts and lack of plan or lack of
2 premeditation somehow -- it's not a mitigator and
3 it's not been referenced as to how that would be a
4 reason in this case to not impose the death
5 penalty.

6 He's speaking about guilt phase issues and I
7 can only assume that the inference that is being
8 drawn from that is that there is a lingering doubt
9 and that is a completely and totally improper
10 argument at this stage.

11 THE COURT: Mr. Pura?

12 MR. PURA: Judge, I told them I wasn't
13 disputing the fact that it was premeditated and I'm
14 not talking about lingering doubt. And the jury
15 can find any reason -- any mitigating circumstance
16 in the evidence.

17 THE COURT: I agree with that. Can you wrap
18 it up so that they realize your argument is
19 connected to one of the mitigators? You think you
20 can throw that in, "Number 15 is going to say
21 anything" and --

22 MR. PURA: I'm talking about that it was a
23 spontaneous and that, you know --

24 THE COURT: I just don't -- I'm not saying you
25 shouldn't argue that. Argue it all you want. But

1 you make sure that you wrap it up where it goes in
2 the mitigation part of it for the jury because it
3 sounds like lingering doubt. But if you go ahead
4 and say, "Hey, Number 15 says you can take into
5 consideration anything."

6 MR. PURA: I'm not limited to the listed
7 mitigators. A mitigating circumstance can come
8 from anywhere.

9 THE COURT: Mr. Pura, the part where it goes
10 to anything is that last one. You tell them,
11 "There's the last one." The last one says
12 anything. Anything at all. You can use anything.

13 MR. PURA: So I'm being instructed to -- what
14 my argument should be? That I should refer to --

15 THE COURT: I'm saying you have to -- you have
16 to connect your argument to the anything and all or
17 the Court's going to find that it sounds like
18 lingering doubt.

19 The problem is that if you don't connect it to
20 something, that's what it sounds like. So I agree
21 you can argue anything you want, just throw in it
22 can come from anything and there you go.

23 MR. PURA: Kind of figured that's what I was
24 talking about, Judge.

25 THE COURT: How does the jury know? It's just

1 like opening; you got to hook it to one of my
2 instructions or it sounds like lingering doubt.
3 You can't argue lingering doubt. So I'm not
4 telling you how to make your argument and I'm
5 overruling the objection as long as you're going to
6 connect it to something the Court's going to rule
7 on.

8 MR. PURA: Yes, Your Honor.

9 THE COURT: Okay.

10 (OPEN COURT.)

11 THE COURT: All right. You may proceed.

12 MR. PURA: So the objection is overruled?

13 THE COURT: As long as you're going to wrap it
14 up.

15 MR. PURA: To remind you, you can base -- you
16 can find a mitigating circumstance from any of the
17 evidence. And I'm arguing to you that Adam Matos
18 had no intent to go over there and kill anybody
19 when he reentered the house, that he had no plans
20 to kill anybody. You can base -- you can use that
21 and find that a mitigating circumstance.

22 Again, he had no plans. He did not have this
23 planned out. As I said, he just tossed the riffles
24 into the canal and he tried to bury the bodies next
25 to the house. He had no plan to kill anybody.

1 Furthermore, he did not sneak into the house
2 when he reentered the house. The State has not
3 proven -- has not presented any evidence that he
4 snuck into the house. So in the absence of
5 evidence, they presented two directly opposing
6 theories: Well, he must have jimmied the lock with
7 a bobby pin. Why? Well, because he did that in
8 the past for the neighbor.

9 If you don't agree to that, then he must have
10 slipped in through the garage when Margaret drove
11 home. And then what, surprised everybody inside?
12 Viciously attack Margaret in the garage and got the
13 jump on everybody inside? They would have heard
14 the garage door open once she came home. They were
15 expecting her to come home. They were fully
16 clothed. They were awake. You got 20 dogs
17 yapping. He didn't get the jump on anybody. He
18 did not sneak into the house and he did not reenter
19 the house to kill anybody. This was a spontaneous
20 crime of passion, not coldblooded murder.

21 If Adam Matos were evil, if he were a
22 coldblooded murderer, he had an arsenal inside the
23 house. He could have robbed, shot the pizza guys,
24 he could have robbed and shot the dog people. He
25 could have shot the police when they came to the

1 door. He snuck out the back with [REDACTED] and got
2 into the canoe. And do I need to go there? He
3 didn't harm the dogs. He didn't harm [REDACTED].
4 These homicides were not the acts of an evil and
5 wicked and coldblooded killer; they were crimes of
6 passion.

7 MR. LABRUZZO: Judge, objection. Improper
8 argument.

9 THE COURT: Approach.

10 (BENCH CONFERENCE.)

11 MR. LABRUZZO: Judge, again, my objection is
12 that it's an improper argument because he's now
13 suggesting lingering doubt. He said it once and I
14 let it go as these were not intentional killings,
15 although the jury verdict has been quite to the
16 opposite. He's now used the term that these were
17 crimes of passion, a defense which was presented
18 and has been rejected. He is deliberately going
19 back into the --

20 THE COURT: I know. I got it.

21 Mr. Pura, you argued crime of passion and they
22 denied that. Do not do that now.

23 MR. PURA: I'm not using the term heat of
24 passion.

25 THE COURT: Oh, okay. So we're being

1 semantics?

2 MR. PURA: Well, passion is --

3 THE COURT: It's improper.

4 MR. PURA: It's a morphos word. It not --

5 THE COURT: No.

6 MR. PURA: Passion is a word that has
7 different meanings.

8 THE COURT: Well, I disagree. Your arguing --
9 you're rearguing the guilt phase when you use those
10 words, so I'm going to sustain the objection.
11 We're moving on.

12 (OPEN COURT.)

13 THE COURT: That will be sustained.

14 MR. PURA: None of this would have happened if
15 ██████ did not exist. Adam would not have moved
16 down to Florida just to maintain his relationship
17 with Megan Brown. But let's say he would have. He
18 would have moved down in an effort maybe to start a
19 family with her.

20 If ██████ were not involved and if Megan had
21 grown tired of Adam or had met somebody else, which
22 is perfectly normal in a relationship. There's
23 nothing nefarious about that. There's no reason to
24 believe that Adam would have done anything but
25 withdraw from the situation, move back to

1 Pennsylvania.

2 You heard that he had a lengthy relationship
3 with Megan off on and on. You didn't hear anything
4 about any prior violent acts. I mean, the morning
5 of with the knife, you heard about that, of course.
6 But nothing --

7 MR. SARABIA: Objection, Judge. May we
8 approach?

9 THE COURT: Approach.

10 (BENCH CONFERENCE.)

11 MR. SARABIA: Defense Counsel just stated,
12 "You didn't hear anything about any prior violent
13 acts." They specifically objected when we tried to
14 go into testimony about prior violent acts when
15 they indicated that he --

16 THE COURT: Hold on one second.

17 Madam Court Reporter, will you read back the
18 Defense -- when he restarted the Defense's
19 statement. I hate to do that to you. I apologize.

20 (Thereupon, the court reporter reads back.)

21 THE COURT: The problem is is that we didn't
22 get into the prior record. I have no idea if
23 they -- if they occur with Megan. So we're just
24 going to move on, but we're not going to talk about
25 any prior violent act.

1 MR. PURA: Megan said in the 911 call that he
2 had never done anything like this before.

3 THE COURT: No. No. No. No. No. No. No.
4 Stop.

5 MR. LABRUZZO: That's because --

6 THE COURT: Stop. That's not what she said.
7 No. What she said is, "He never actually tried to
8 kill me." That means he threatened.

9 MR. PURA: No. She said, "He's never done
10 anything like this before."

11 THE COURT: No. What she said is -- her words
12 exactly, I wrote them down, "He's never tried to
13 actually kill me before" which led me to believe
14 that he had actually threatened her before. The
15 words are -- and I will quote you because I wrote
16 them verbatim -- "He's never actually tried to kill
17 me before" which led me to believe that he actually
18 had threatened to kill her before.

19 MR. PURA: I disagree, Judge, I don't think
20 she said the word "kill me."

21 THE COURT: I can guarantee you -- not a
22 million dollars. I wrote them down in my notes.
23 And the 911 tape, I can stop right now and play it.
24 She says, and I quote, "He never actually tried to
25 kill me before." So that led me to believe that he

1 actually threatened to kill her before, threatened
2 her before. But notwithstanding, we're not
3 going -- we know that he has prior records of
4 violence. You know that. He was impeached with
5 his prior acts. I know what they are; they're
6 assaults. That's a violent act, right?

7 MR. PURA: I'm talking about the relationship
8 with Megan.

9 THE COURT: But that's not what -- number one,
10 you don't know that. Number two, that's not facts
11 in evidence because you're misrepresentation the
12 911 tape.

13 MR. PURA: I'm talking about the lack of
14 evidence, Judge. It's part of my argument.

15 THE COURT: You cut out their using any prior
16 acts. This was a Williams Rule act. Do you want
17 them to bring in his prior record? You most
18 certainly did not allow them to bring in their
19 tumultuous relationship other than what happened on
20 the 911 tape. So you can't bring in that he
21 doesn't have a violent past; you don't know that.

22 So you can talk about what happened on the 911
23 tape, but we're going to move on. Okay?

24 MR. SARABIA: Judge, just for the record, I
25 would note there were parts of the 911 tape that

1 were redated.

2 THE COURT: Mr. Pura.

3 MR. SARABIA: There were parts of the 911 tape
4 redacted under Judge Siracusa's order that
5 reference prior violent acts between Adam and
6 Megan. So ...

7 THE COURT: So I wasn't there for the whole
8 911 tape. I only have the part that was admitted.
9 But supposedly there's acts on that 911 tape of
10 prior bad acts by your client. And then you
11 redacted --

12 MR. PURA: You're taking the State's word for
13 that, Judge.

14 THE COURT: No. You were there. Are you
15 disagreeing with them on the 911 tape?

16 MR. PURA: That she was referring to prior
17 acts of violence?

18 THE COURT: No. He's saying you redacted
19 parts of it. Do you not know what's on the 911
20 tape? Do you not know what was redacted?

21 MR. PURA: I don't recall right now.

22 THE COURT: Okay. Well, then we're going to
23 move on.

24 (OPEN COURT.)

25 THE COURT: That will be sustained. You can

1 move on.

2 MR. PURA: Ladies and gentlemen, there's no
3 reason to believe that Adam Matos would have
4 snapped just at the prospect of losing Megan.

5 To begin to understand why he snapped, you
6 have to begin to understand his relationship to his
7 son [REDACTED]

8 He agreed to move down to Florida to keep his
9 family together, to be the father to [REDACTED] that
10 he never had. Within two months he's kicked to the
11 curb. Megan Brown no longer wanted to have
12 anything to do with him. And if it were just a
13 matter of losing Megan, he would have simply
14 withdrawn and gone back to Pennsylvania, but much,
15 much more was at stake.

16 I'm going to talk about the witnesses you
17 heard yesterday because you heard them yesterday --

18 Let me back up. Before I go to the witnesses,
19 let me talk about some other mitigating
20 circumstances that you could find.

21 Adam's courtroom demeanor. You've had three
22 weeks to observe him. He's always been calm,
23 attentive, respectful. He hasn't been rolling his
24 eyes or shaking his head or yammering into his
25 attorney's ear. Maybe you saw him cry when the 911

1 tape was played, a difficult tape to hear from
2 Megan. Maybe you saw him cry in the videos of him
3 and [REDACTED] at the Circle K and the Tampa hotel
4 lobby.

5 He obviously respects authority. He was even
6 polite to Mr. Sarabia when Mr. Sarabia --

7 (Courtroom door banging.)

8 THE COURT: I apologize for that.

9 You may proceed.

10 MR. PURA: He was even polite to Mr. Sarabia
11 as he was standing over him taunting him, telling
12 him how he wants to kill him.

13 MR. SARABIA: Objection, Judge.

14 THE COURT: Sustained as to "taunt."

15 You may proceed.

16 MR. PURA: The witnesses that you heard
17 yesterday were all friends and family members
18 except for one, Ms. Austin, the neighbor. She saw
19 something in him to trust him, and he confirmed her
20 trust by proudly showing up a week or so later with
21 a new bike that she gave him money to buy.

22 The other witnesses, as I said, were friends
23 and family members. And because they testified
24 just yesterday, not weeks ago, I won't -- I don't
25 feel the need to rehash all the details of their

1 testimony. But what was the composite picture that
2 they created of Adam Matos? Let's talk about his
3 childhood.

4 As you know, he moved a dozen times or so as a
5 young child, suffered from asthma. He endured some
6 bullying. His mother had a mental illness and was
7 often abused by her boyfriends in front of Adam.
8 Not the worst childhood in the world. Plenty of
9 people have suffered more severely negative
10 childhoods and gone on and not committed crimes.

11 I mean, look at Peter the State has said.
12 Look at Peter. The same childhood, different
13 results. Well, for one thing, big difference
14 there, Peter and Adam were half brothers, so they
15 basically have two different gene pools. But more
16 importantly, what did Peter have that Adam did not
17 have? Peter had a father figure. Adam never knew
18 his father. His father was never around. And the
19 value --

20 (Courtroom door banging.)

21 MR. PURA: -- the value of a positive male
22 role model in a young boy's life can never be
23 understated.

24 But my point is that not that these childhood
25 events led him to commit these crimes, no. The

1 point is that these childhood events speak of
2 Adam's character, that throughout his childhood he
3 maintained a positive and cheerful attitude. He
4 was happy and he was fun to be around even as a
5 young child.

6 What else? What else about this composite
7 picture that these people created for you about
8 Adam? Simply put, he's a nice guy. Of course,
9 they were all his friends and families, but what
10 was the common thread running through their
11 testimony? That he was fun to be around even as a
12 young child.

13 What they were describing is someone who has a
14 gentle soul. They liked being with him, that he is
15 not the evil and wicked animal that the State would
16 have you believe. And all those witnesses, no one
17 denied that Adam committed these acts. No one
18 made -- tried to make any excuses for him. No one
19 tried to blame anybody else for his actions. And,
20 yet, they all profess their continuing love and
21 support for him.

22 What was the most poignant testimony was the
23 testimony of Adrianna and Keira. Keira's testimony
24 was particularly gut wrenching. They knew the
25 Browns. They lived with the Browns. They loved

1 the Browns, yet they came here to testify on behalf
2 of Adam Matos, even though clearly they were still
3 mourning the loss of Greg, Margaret and Megan
4 Brown. What was the upshot of their testimony?
5 That even though they know what Adam did to people
6 they loved, they still could not bring themselves
7 to hate him because they know him; they know what
8 type of person he is; and that these crimes were
9 completely out of character.

10 Now, let's talk about what you heard regarding
11 the circumstances leading up to these homicides.

12 Adam Matos left his friends and family, a
13 large group of people up in northern Philadelphia
14 to move to Florida to be part of a family, to be
15 the loving father he never had. He wasn't just
16 some lonely drifter who had nowhere to go. He had
17 many friends and many family members around him.
18 He had plans for a career. He was going to school.
19 He was commuting to New York. But he tossed all of
20 that aside in order to be with [REDACTED].

21 And that's what I'm saying again, ladies and
22 gentlemen; it's all about [REDACTED]. What did you
23 hear from all of those witnesses is that Adam Matos
24 was completely devoted to his son, doting on his
25 son. Go to his friend's house. His friends would

1 be -- I forget exactly what circumstances he talked
2 about. And use your memory, not mine. Something
3 about his friends would be downstairs watching
4 sports and Adam would be upstairs, you know,
5 playing with [REDACTED].

6 The bottom line is that this composite picture
7 that was presented to you, there's nothing in Adam
8 Matos's past that foretold these crimes. They were
9 spontaneous and isolated acts and they would have
10 never happened but for [REDACTED].

11 I want to talk about mercy.

12 The greatest master of the English language,
13 undisputed, lived 400 years ago. His name was
14 William Shakespeare. And there's a reason why his
15 plays, which are often difficult for modern
16 readers, there's a reason why his plays are being
17 staged everywhere in the world everyday for the
18 last 400 years. Plays like Macbeth, King Lear,
19 Hamlet, Romeo and Juliet, Othello, and the list
20 goes on and on. Over 38 plays, I think.

21 And the reason why he's as popular now as he
22 was 400 years ago is because the human emotions
23 that he talked about, that he staged, that he
24 presented in his productions ring as true today as
25 they did 400 years ago.

1 And one of those -- the emotions of jealousy,
2 rage, envy, grief, love, revenge and mercy. And
3 the human emotion of mercy is most famously
4 depicted in his play The Merchant of Venice. And
5 the heroin, the female hero of that play, her name
6 is Portia. And this is what Portia -- this is how
7 she described mercy.

8 And if there are any Shakespearean purists
9 amongst you, I apologize ahead of time.

10 This is what Portia said. She said, The
11 quality of mercy is not strained. It falls like
12 the gentle rain from heaven to the place beneath.
13 It is twice blessed; it blesses him who gives and
14 him who takes. It is mightiest in the mightiest;
15 it becomes the throned monarch better than his
16 crown; the king's scepter symbolizes his earthly
17 powers, power which is awesome and majestic, power
18 which invokes dread and fear in his enemies. But
19 mercy, mercy is above that scepter of power because
20 mercy is enthroned in the hearts of kings. It is
21 an attribute to God himself; and earthly deeds do
22 most resemble Godly deeds when mercy tempers
23 justice.

24 What was Shakespeare talking about? The same
25 thing another man talked about 1,600 years before

1 him, a man named Jesus. Now, Jesus was a preacher.
2 He would travel from village to village spreading
3 God's word. And one day he was in a village deep
4 in thought, as he often was. And he walked out of
5 the village following a path, a path that led up
6 the side of a mountain completely oblivious to his
7 surroundings, completely deep in thought.

8 At some point he turns around and he sees that
9 his disciples and a large crowd of villagers had
10 been following him. They saw that he was deep in
11 thought. They wanted to know what he was thinking.
12 They wanted to hear him preach, so he obliged them.
13 He sat on this huge rock and delivered what is now
14 called the Sermon On The Mount.

15 Now, he began his sermon as he began all of
16 his sermons. He recited the Lord's Prayer. He
17 warned against judging people. "Judge not lest ye
18 be judged." He warned against worshiping false
19 prophets. They are wolves in sheep's clothing.
20 But this sermon was different. He talked about
21 something that he hadn't discussed before.

22 In this sermon he presented what we now call
23 the Beatitudes. And the Beatitudes are familiar to
24 Christians and nonChristians alike. They are
25 essentially Jesus's recipe for spiritual

1 fulfillment.

2 Jesus preached that in order to achieve
3 spiritual fulfillment one must embrace values and
4 ideals that transcend the Old Testament, that
5 transcend the strict ideal of justice represented
6 by the phrase, "An eye for an eye." Jesus felt
7 that and preached that in order to achieve that
8 spiritual fulfillment, one needed to embrace
9 emotions, principles such as: Humility,
10 compassion, forgiveness.

11 Humility. "Blessed are the meek for they
12 shall inherit the earth."

13 Compassion. "Blessed are those who mourn, for
14 they shall be comforted."

15 And forgiveness. "Blessed are the merciful,
16 for they shall receive mercy."

17 Does it sound familiar? Mercy is twice
18 blessed. Blesses him who gives and him who takes.

19 Why is Adam Matos worthy of your mercy?
20 Because but for his love for [REDACTED] none of this
21 would have ever happened.

22 Has there ever been created a stronger bond
23 between two human beings than that between a parent
24 and a child? Who can measure the strength of love
25 that a parent has for his or her child, that a

1 father has for his son. Is there anything a parent
2 would not do to save their child? Is there
3 anything more despairing to a parent than the
4 prospect of losing a child? Can a parent ever be
5 put into a more dire situation than that in which
6 he believes he is on the verge of having his child
7 taken away from him? His only child. Is there a
8 limit to what a desperate parent who thinks he's
9 about to lose his only child is capable of doing to
10 prevent that from happening? I submit to you, the
11 only limit is that parent's physical capabilities.

12 And a father who goes to extreme measures to
13 keep his son, even to the point of committing
14 homicide, is not acting out of evilness or
15 wickedness, but, rather, he's acting instinctively
16 reacting to the despair, the rage, the agony, the
17 jealousy, the torment of losing his only child.

18 Ladies and gentlemen, these are the clothes
19 that Adam Matos will wear for the rest of his life
20 (indicating). He will be told what to eat, when to
21 eat; he will be watched when he takes a shower,
22 when he uses the bathroom facilities. The only
23 time he will leave prison will be in a box. The
24 question is will it be from a call from a higher
25 being or a call from our governor.

1 Together the 12 of you possess the awesome
2 power of death. But there is a power even more
3 awesome than the power of death and that's the
4 power of life. And each of you individually hold
5 in your hands the power of life.

6 I stand before you humbly to urge you, as we
7 approach holiday season, embrace the better angels
8 of your nature and choose life. You'll never
9 regret it.

10 (Excerpt concluded.)

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STATE OF FLORIDA)
)
COUNTY OF PASCO)

I, Victoria L. Campbell, Registered
Professional Reporter, certify that I was authorized
to and did stenographically report the foregoing
excerpt and that the transcript is a true record.

DATED this 15th day of February, 2017.

/s/Victoria L. Campbell

Victoria L. Campbell, RPR