

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL
CIRCUIT IN AND FOR DADE COUNTY, STATE OF FLORIDA

STATE OF FLORIDA,
Plaintiff

vs.

Quentin Wyche
Defendant,

) CASE NO: F10009090
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) JUDGE: Miguel M. De La O
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MOTION TO MITIGATE SENTENCE

The Defendant, **Quentin Wyche**, in the above cause, through undersigned counsel, pursuant to Fla. R.Cr.P. 3.800(b), moves the Court to reduce the sentence rendered herein, and as grounds therefore would state the following:

1. Quentin was sentenced on **November 25th, 2013** to Twenty(20) years prison plus Five(5) years probation for Murder in the Second Degree after a jury trial finished September 11th, 2013 in front of this Honorable Court. His scheduled release date is November 1st, 2028. He had been in jail and prison since March 25th, 2010.

2. A Notice of Appeal was filed on December 16th, 2013 and the Third DCA affirmed with a written opinion on August 7th, 2015.

3. An appeal was then taken to the Florida Supreme Court and the Petition for discretionary review was denied on **June 24th, 2016**, therefore, we are within the Sixty(60) day window that ends **August 23rd, 2016**. Quentin's current release date is October 23rd, 2028.

4. The mitigating arguments for this Motion are the following:

- Quentin has completed a program called D.I.R.E.C.T (Direct Involvement Reduces the Effect of Criminal Thinking) while in Prison(see attached letter). This program provides information on criminal thinking errors. Then they teach the way to think better to control one's emotions when dealing with conflicting issues. Quentin is trying to improve for himself, his family, friends and community.
- Quentin is truly sorry for his actions, prays for Kendall and his family daily. He showed remorse at the

- sentencing hearing and addressed the victim's family who were very merciful which we are grateful for.
- While Quentin is away from his family and loved ones and he is growing spiritually daily.
 - Quentin wants to be a successful businessman and an innovator with fresh ideas and to benefit others.
 - Quentin's family and community support has grown since this case and will be there upon the completion of his sentence. Petitions and letters have been completed and he will be subsequently submitted.
 - When Quentin is released he will continue to be a mentor in the community for kids, with and without troubled childhoods in a positive and influential way.
 - Quentin mentored and tutored kids for two non-profit organizations, Prince II Kings, Christian Academy as a volunteer. Letters will also be subsequently submitted.
 - Quentin was a member at New Hope Baptist Church and on a Hospitality committee. He participated in marches against violence and participated in back to school events Also, while on Pre-Trial release Quentin maintained a job, a trade and completed a vocational course in Computer networking and A Plus essential at Sullivan on-line while on Pre-Trial release. He successfully completed thirteen months with the Electronic Monitor with no violations. He was so desperate for a job and since his opportunities were limited because of the charge he was taking a truck-driving course up to the verdict.
 - Also, he attended many schools, including, Dean College in 2006-2007, Jacksonville University 2007-2008, and FIU 2009-2010 successfully completing each year. He had job at every college he attended and was the first one in his family to attend college. He successfully completed thirteen months with the Electronic Monitor with no violations. He was so desperate for a job and since his opportunities were limited because of the charge he was taking a truck-driving course up to the verdict.
 - Quentin has a younger sister in high school that is heavily involved in school activities and has a bright future. Quentin have a son who is Five years old and he wants to guide him in his life. The mother is trying to terminate Quentin's parental rights.
 - Upon his release Quentin has a job opportunity with JadenSky Joint heir investment group in Fort Lauderdale who will also submit a letter.
 - Quentin has never used alcohol or controlled substances.

5. **Quentin Wyche, through his attorney, Barry Butin, is requesting a hearing in order to take testimony and argue this Motion to Mitigate in open court. Paperwork will be subsequently submitted to the court.**

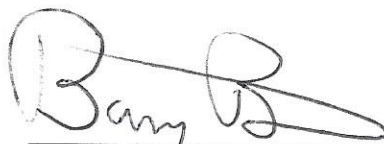
6. I have filed a Notice of Appearance for this Motion and have left messages with the prosecutor Mr. Araujo.

WHEREFORE, Defendant prays this Honorable court will enter an Order reducing the sentence imposed in this cause to **9.25 years in prison (would be the bottom of the Sentencing guidelines if Quentin had been convicted of Manslaughter, a Second Degree Felony followed by the original Five years probation for the reasons stated above.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by filing to **the Dade County State Attorney's Office Division Division F15**, Richard E. Gerstein Justice Building, Miami, Florida, this 14th day of **August**, 2016.

cc: **Raimundo Carlos Araujo, Esq.**
Assistant State Attorney
-By E-Filing

A handwritten signature in black ink, appearing to read "Barry Butin", is written over a horizontal line.

Barry Butin, Esq.
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