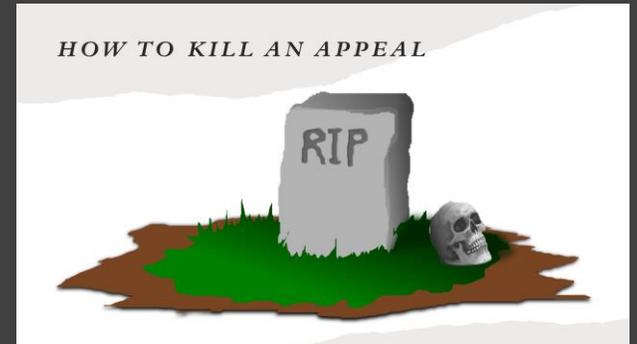




*WHAT HAPPENS
AFTER THE
GAVEL FALLS?
YOUTH COURT
APPEALS*

Stacy Ferraro & Brenda Locke
March 19, 2026
Biloxi, Mississippi



WHY APPEAL?





CLARIFY



ADDRESS
INJUSTICE



MAKING THE RECORD



**Don't wait for the right
opportunity: create it.**

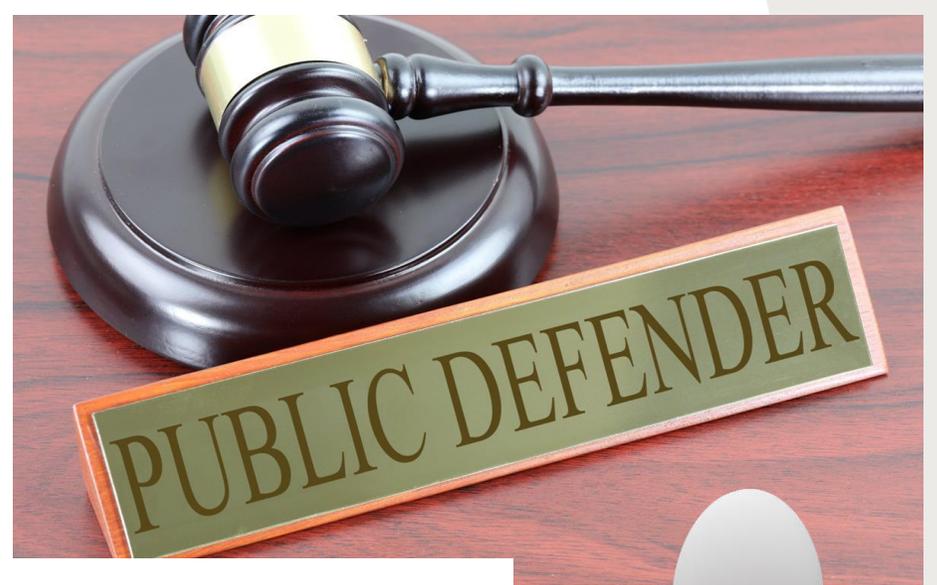
George Bernard Shaw

“ quote fancy



Preserve the Record

WHAT!



ADJUDICATORY PHASE



Objections





Opening



Direct



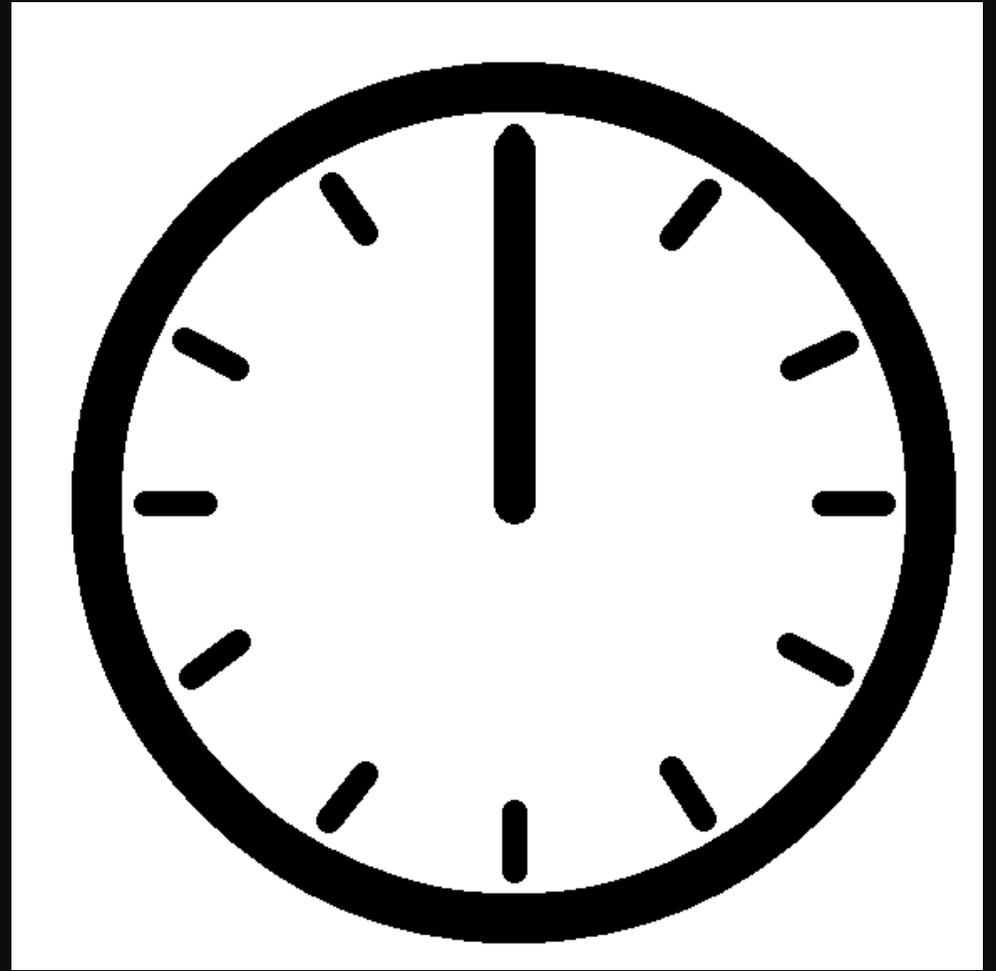
Cross



Closing

When to object

All the time!



A close-up photograph of a vinyl record on a turntable. The record is white with a black center label. A tonearm with a stylus is positioned over the record. The background is blurred, showing a person's hand near the turntable.

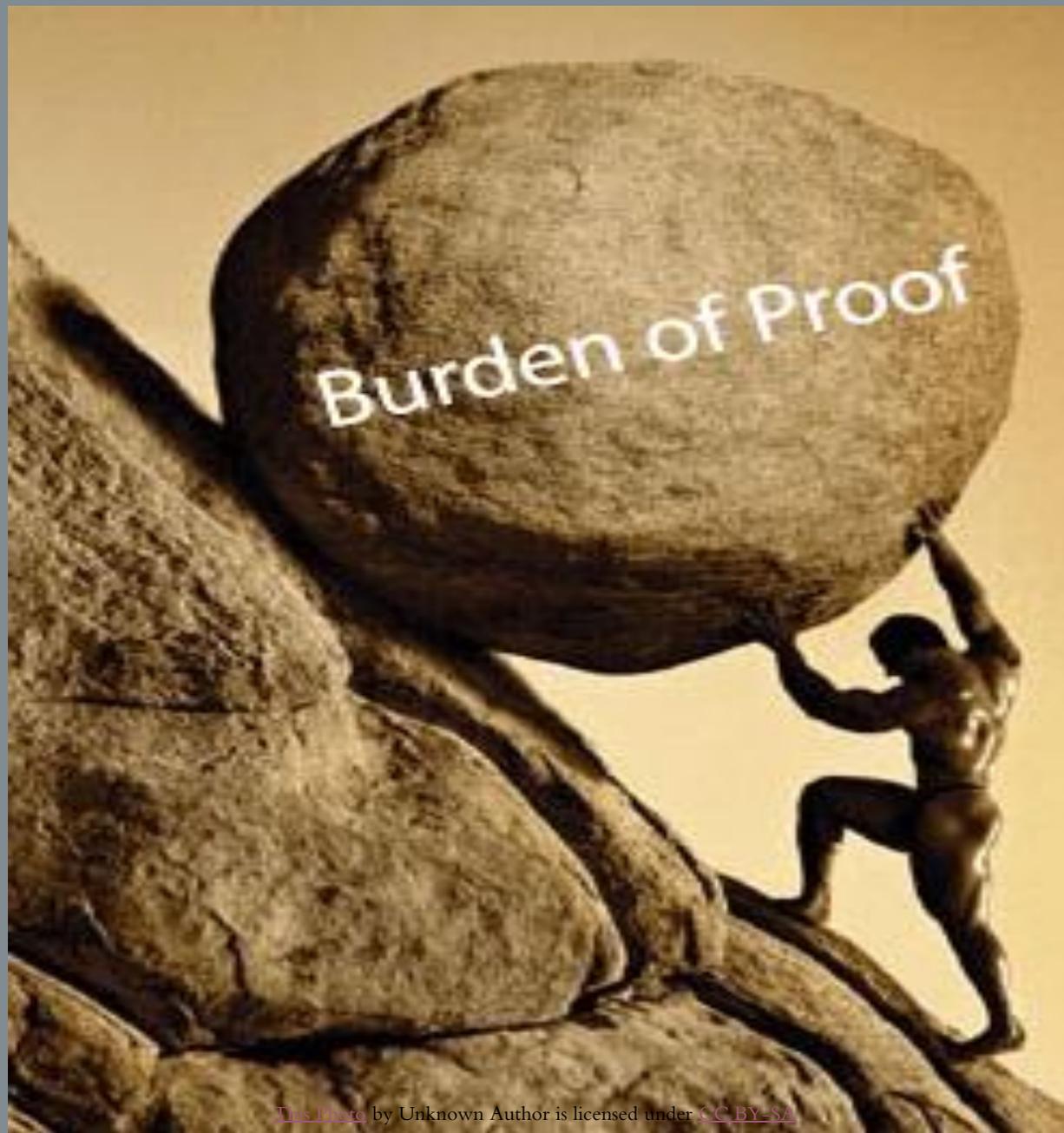
When objecting or
making a record

BE INTENTIONAL

HEARSAY







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IMPROPER EVIDENCE

IMPROPER EVIDENCE

SAMMILE SCHOOL BURKAPATNAM (ANNEXURE B)						SAMMILE SCHOOL BURKAPATNAM (ANNEXURE B)																	
Sl. No.	Address	Area	Plot Area	Volume	Area	Sl. No.	Address	Area	Plot Area	Volume	Area	Sl. No.	Address	Area	Plot Area	Volume	Area	Sl. No.	Address	Area	Plot Area	Volume	
462	Choleppa	gannappan	2. 11 - 9	Andrapada	Coaly	2741	17.36	Shrinivas	And	And	I												
463	Adappa	Darsi	11 - 11	Andrapada	"	"	17.36	"	"	"	I												
464	gannappa	gutta	11 - 11	Andrapada	"	"	17.36	"	"	"	I												
465	gannappa	Saka	11 - 11	Andrapada	"	"	17.36	"	"	"	I												
466	gannappa	Andrapada	11 - 11	Andrapada	Coaly	2741	17.36	"	And	And	I												
467	gannappa	Mula	11 - 11	Andrapada	Coaly	2741	17.36	"	And	And	I												
468	Venkatesh	Darsi	11 - 11	Andrapada	"	"	17.36	"	"	"	I												
469	Mangundak	Mulwaj	11 - 11	Andrapada	"	"	17.36	"	And	And	I												
470	Andradeen	Pattipati	11 - 11	Andrapada	"	"	17.36	"	And	And	I												
471	Modan Sab	Shrik	11 - 11	Andrapada	"	"	17.36	"	And	And	I												
472	gannappa	Dappal	11 - 11	Andrapada	"	"	17.36	"	And	And	I												
473	Varayana	gutta	11 - 11	Andrapada	"	"	17.36	"	And	And	I												

Sammiti Elementary School where Satya studied; the building has since undergone structural changes.



IMPROPER EVIDENCE

SMITH ELEMENTARY SCHOOL BURKAPATNAM (ANNEXURE B)										SMITH ELEMENTARY SCHOOL BURKAPATNAM (ANNEXURE B)													
Sl. No.	Roll No.	Age	Address	Religion	Enrollment No.	Enrollment Date	Enrollment Fee	Exam Fee	Other Fees	Remarks	Sl. No.	Roll No.	Age	Address	Religion	Enrollment No.	Enrollment Date	Enrollment Fee	Exam Fee	Other Fees	Remarks		
662	14	7	663	15	7	
664	16	7	665	17	7	
666	18	7	667	19	7
668	20	7	669	21	7
670	22	7	671	23	7
672	24	7	673	25	7



Smith Elementary School
where Enrolment started the building
has been under the control of the
Government

IMPROPER EVIDENCE

SMITH ELE SCHOOL BUEI PATNAM										SMITH ELE SCHOOL BUEI PATNAM												
NO.	NAME	AGE	SEX	HT	WT	HAIR	EYES	SCARS	MARKS	REMARKS	NO.	NAME	AGE	SEX	HT	WT	HAIR	EYES	SCARS	MARKS	REMARKS	
662	Abel	24	M	5-8	140	Black	Brown				663	Adams	24	M	5-8	140	Black	Brown				
664	Adams	24	M	5-8	140	Black	Brown				665	Adams	24	M	5-8	140	Black	Brown				
666	Adams	24	M	5-8	140	Black	Brown				667	Adams	24	M	5-8	140	Black	Brown				
668	Adams	24	M	5-8	140	Black	Brown				669	Adams	24	M	5-8	140	Black	Brown				
670	Adams	24	M	5-8	140	Black	Brown				671	Adams	24	M	5-8	140	Black	Brown				
672	Adams	24	M	5-8	140	Black	Brown				673	Adams	24	M	5-8	140	Black	Brown				

AFFIDAVIT/PROSECUTIVE SUMMARY

OAKLAND POLICE DEPT.

Robert Joe Thompson, Oakland Police Dept., Oakland, Fla.

Sandra J. Thompson, (wife) 314 E. Gully Av., Oakland, Fla.

Mr. Tommy Zeigler to the hospital. That he asked Mr. Zeigler who shot him and heard Mr. Zeigler reply, CHARLIE MAYS.

24 December 1975

Charlie B. Thompson

Oakland Police Dept., 401

IMPROPER EVIDENCE

SMITH ELEMENTARY SCHOOL BUREAU OF INVESTIGATION									
NO.	NAME	ADDRESS	PHONE	DATE	TIME	TYPE OF EVIDENCE	LOCATION	STATUS	REMARKS
662	Chalapa	San Francisco	415-555-1234	12-1-75	10:30	Handwritten notes	Room 101	✓	
663	Adapa	Dani	415-555-1234	12-1-75	11:00	Handwritten notes	Room 102	✓	
664	Sanjaya	San Francisco	415-555-1234	12-1-75	11:30	Handwritten notes	Room 103	✓	
665	Sanjaya	San Francisco	415-555-1234	12-1-75	12:00	Handwritten notes	Room 104	✓	
666	Sanjaya	San Francisco	415-555-1234	12-1-75	12:30	Handwritten notes	Room 105	✓	
667	Sanjaya	San Francisco	415-555-1234	12-1-75	13:00	Handwritten notes	Room 106	✓	
668	Sanjaya	San Francisco	415-555-1234	12-1-75	13:30	Handwritten notes	Room 107	✓	
669	Sanjaya	San Francisco	415-555-1234	12-1-75	14:00	Handwritten notes	Room 108	✓	
670	Sanjaya	San Francisco	415-555-1234	12-1-75	14:30	Handwritten notes	Room 109	✓	
671	Sanjaya	San Francisco	415-555-1234	12-1-75	15:00	Handwritten notes	Room 110	✓	
672	Sanjaya	San Francisco	415-555-1234	12-1-75	15:30	Handwritten notes	Room 111	✓	
673	Sanjaya	San Francisco	415-555-1234	12-1-75	16:00	Handwritten notes	Room 112	✓	



AFFIDAVIT/PROSECUTIVE SUMMARY

OAKLAND POLICE DEPT.

Robert Joe Thompson, Oakland Police Dept., Oakland, Fla. 407-555-1234

City of Oakland, Box 377, Oakland, Florida 32760

Sandra J. Thompson, (wife) 314 E. Gullay Av., Oakland, Fla. in

Mr. Tommy Zeigler to the hospital. That he asked Mr. Zeigler who shot him and heard Mr. Zeigler reply, CHARLIE MAYS.

CHARLIE MAYS

December 1, 1975

Charlie Mays, Oakland Police Dept., 401

December 1, 1975

Charlie Mays, Oakland Police Dept., 401

IMPROPER EVIDENCE

SMITH ELE SCHOOL BUKKAPATNAM				SMITH ELE SCH BUEI PATN			
NO	NAME	AGE	SEX	REL	RES	DATE	TIME
662	Choleppa	3-4-3	M	Wife	Coaly	2-7-61	12:30
663	Adappa	36	M	Wife	"	"	"
664	Janappa	30	M	Wife	"	"	"
665	Janappa	3-4-3	M	Wife	"	"	"
666	Satyanarayana	30	M	Wife	Coaly	2-7-61	6:00
667	Murugana	30	M	Wife	Coaly	2-7-61	12:30
668	Venkatiah	30	M	Wife	"	"	"
669	Mangaladka	30	M	Wife	"	"	"
670	Madhavan	30	M	Wife	"	"	"
671	Madhan Sub	30	M	Wife	"	"	"
672	Janappa	30	M	Wife	"	"	"
673	Murugan	30	M	Wife	"	"	"



AFFIDAVIT/PROSECUTIVE SUMMARY

OAKLAND POLICE DEPT.

Case No. 04/09/25655-1636
 Joe Thompson, Oakland Police Dept., Oakland, Fla. 32760
 Chief, Oakland Police Dept.

Y. of Oakland, Box 377, Oakland, Florida 32760
 J. Thompson, (wife) 314 E. Gully Av., Oakland, Fla. 32760

TESTIMONY: That he was the first officer on the scene. That he transported my Zeigler to the hospital. That he asked Mr. Zeigler who shot him and Mr. Zeigler reply, CHARLIE MAYS.

December 1975
 Joe Thompson
 Oakland Police Dept. 401

DECLARATION: I, the undersigned, being a sworn officer of the above-named Police Department, do hereby certify that the foregoing is a true and correct copy of the original report as filed in the files of the above-named Police Department.

DECLARATION: I, the undersigned, being a sworn officer of the above-named Police Department, do hereby certify that the foregoing is a true and correct copy of the original report as filed in the files of the above-named Police Department.

IMPROPER EVIDENCE

SMITH ELEMENTARY SCHOOL BURI PATNAM (ANNEX B)										SMITH ELEMENTARY SCHOOL BURI PATNAM (ANNEX B)									
NO.	NAME	AGE	SEX	REL.	EDUCATION	DATE	TIME	REMARKS	INITIALS	NO.	NAME	AGE	SEX	REL.	EDUCATION	DATE	TIME	REMARKS	INITIALS
662	Chalepa	24	M	3	High School	8-7-61	12:30	Present	AM	663	Adappa	24	M	3	High School	8-7-61	12:30	Present	AM
664	Adappa	24	M	3	High School	8-7-61	12:30	Present	AM	665	Adappa	24	M	3	High School	8-7-61	12:30	Present	AM
666	Satyanarayana	24	M	3	High School	8-7-61	12:30	Present	AM	667	Adappa	24	M	3	High School	8-7-61	12:30	Present	AM
668	Adappa	24	M	3	High School	8-7-61	12:30	Present	AM	669	Adappa	24	M	3	High School	8-7-61	12:30	Present	AM
670	Adappa	24	M	3	High School	8-7-61	12:30	Present	AM	671	Adappa	24	M	3	High School	8-7-61	12:30	Present	AM
672	Adappa	24	M	3	High School	8-7-61	12:30	Present	AM	673	Adappa	24	M	3	High School	8-7-61	12:30	Present	AM



AFFIDAVIT/PROSECUTIVE SUMMARY

OAKLAND POLICE DEPT.

Robert Joe Thompson, Oakland Police Dept., Oakland, Fla. 4212 M.W. 656-1117

City of Oakland, Box 377, Oakland, Florida 32760

Sandra J. Thompson, (wife) 314 E. Gullley Av., Oakland, Fla. is

STANDARDS OF TESTIMONY: That he was the first officer on the scene. That he transported Mr. Tommy Zeigler to the hospital. That he asked Mr. Zeigler who shot him and heard Mr. Zeigler reply, CHARLIE MAYS.

24 December 1975

Charlie R. Thompson

Oakland Police Dept., 601

CHARLIE MAYS

A photograph of a desk with a spiral notebook, glasses, a yellow sticky note, and a pen. The sticky note is yellow and has the text "motion to dismiss" written in red. The notebook is white with a blue cover. The glasses are black. The pen is silver and black. The desk is wooden.

SUFFICIENCY OF EVIDENCE – LEGAL ERROR

- After adjudication:
 1. Move to dismiss for insufficient evidence.
 2. State specific elements lacking proof.

i.e. Element of _____ wasn't met.
BE SPECIFIC
- Even in bench trials, preserve sufficiency.



**Did the mistake
matter?**



CONSTITUTIONALIZE EVERYTHING

- Non-constitutional issues are often subject to a harmless error analysis. Issues tied to the constitution are much more likely to be reversed.
- Constitutional issues are subject to a harmless beyond a reasonable doubt analysis



ISSUES TO WATCH FOR

- Due Process
- Right to confrontation
- Right to Counsel
- Voluntariness of statements
- Miranda in school settings
- Self-incrimination



DISPOSITION ISSUES

A dramatic scene of a collapsed bridge. The bridge's steel truss structure is partially visible, with a large section of the deck and concrete support structure missing. Debris, including chunks of concrete and twisted metal, is flying through the air. Several birds are flying in the sky above the bridge. The background shows a cloudy sky and distant mountains. The overall tone is somber and catastrophic.

OBJECT TO UNSUPPORTED DISPOSITIONS

OBJECT TO DISPOSITIONS THAT
ARE NOT AUTHORIZED BY
STATUTE

NOT AUTHORIZED



IF DETENTION OR COMMITMENT IS ORDERED

- Is there evidence in the record supporting it?
- Were alternatives considered?
- Was least restrictive placement analyzed?

A man with a mustache, wearing a red suit, white shirt, and striped tie, is shown from the chest up. He has a surprised or questioning expression on his face. The background is a stone wall. A large, semi-transparent grey circle is overlaid on the right side of the image, containing text. At the bottom of the image, there is a white text overlay.

Did the court get
the ruling
wrong?

I IMMEDIATELY REGRET THIS DECISION

IF JUDGE RELIES ON:

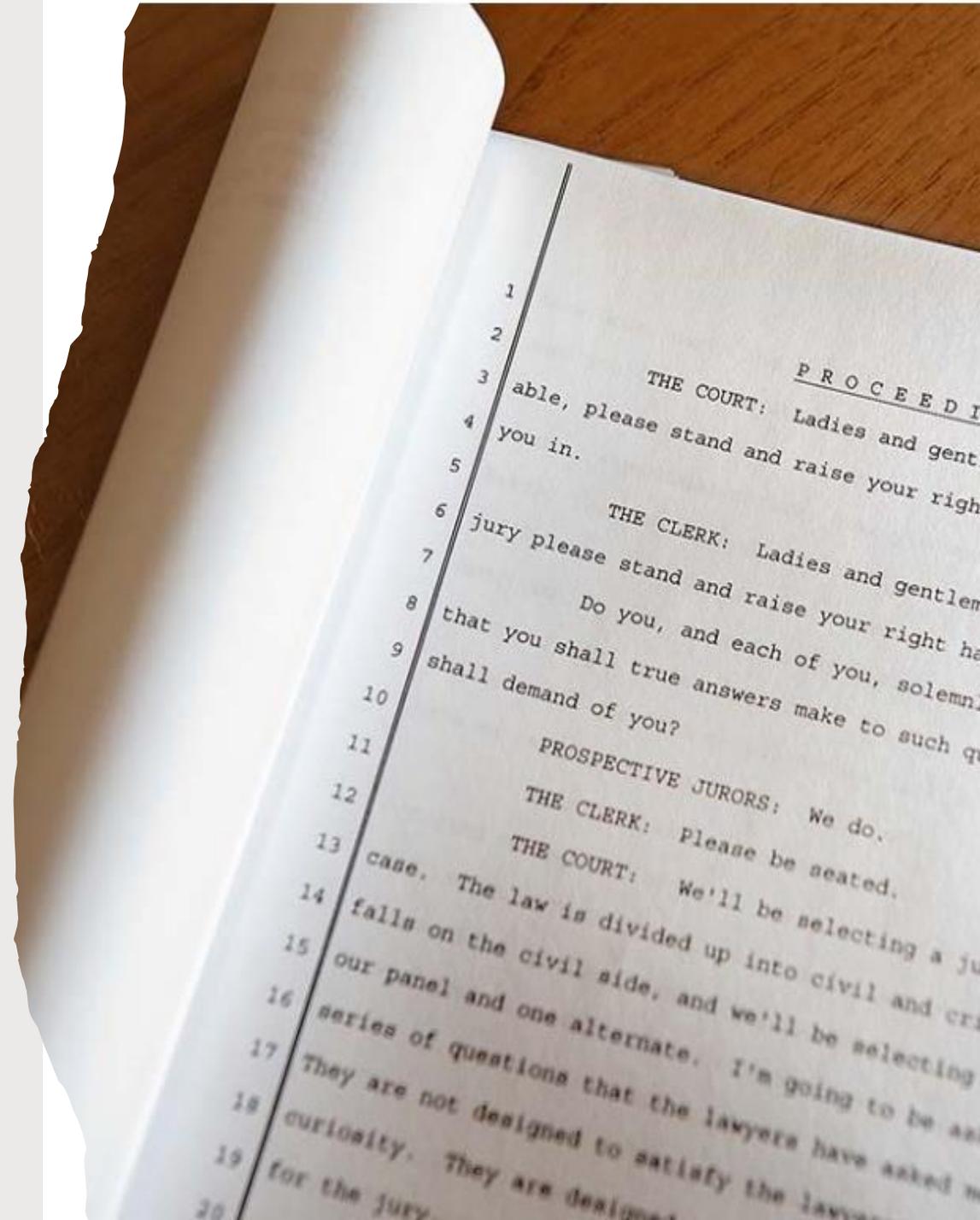
- Off-record knowledge
- Unsworn statements
- Intake reports not admitted

OBJECT



MAKE A RECORD OF MITIGATION

- If you present:
 - Trauma history
 - School Records
 - Mental health information
- Make sure:
 - It is admitted
 - It is summarized clearly on the record
- Appellate court cannot consider what isn't in the transcript



CHALLENGE



COMMITMENT FINDINGS

- If the court orders detention or commitment:
 - Ask for findings on the record
 - Ask the court to articulate reasoning

If findings are vague ask the court to clarify the factual basis for the commitment.



REDUCE INFORMALITY

YOUTH COURTS OFTEN

- Conduct side conversations
- Rely on probation recommendations
- Review documents not marked as exhibits



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DEFENDER SHOULD:



- Ask that discussions be placed on the record



- Move to mark reports as exhibits



- Clarify what the court is relying on.

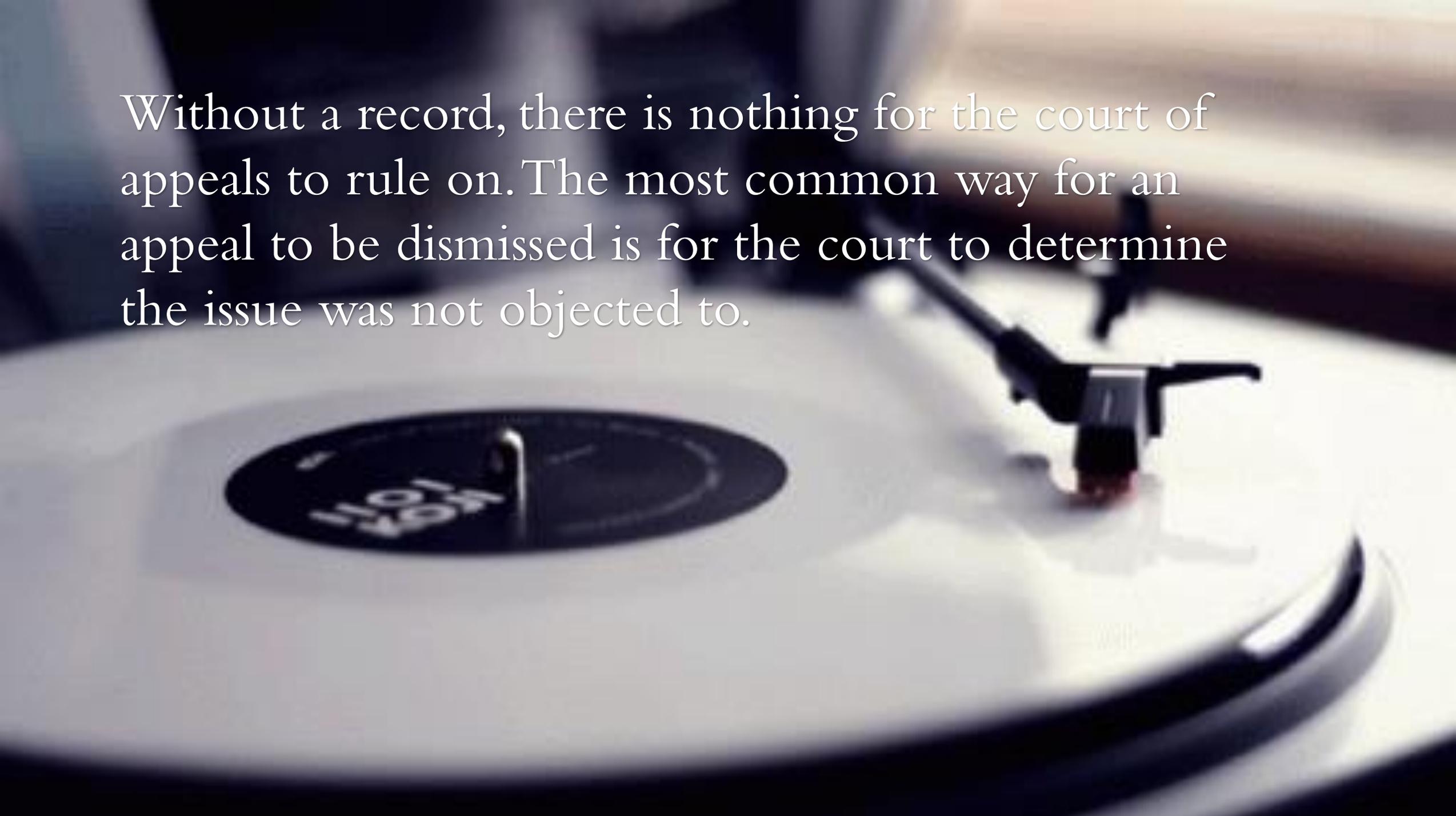
HOW TO KILL AN APPEAL



DO

NOTHING

Without a record, there is nothing for the court of appeals to rule on. The most common way for an appeal to be dismissed is for the court to determine the issue was not objected to.



FOLLOW THESE RULES TO IMPROVE YOUR APPELLATE OUTCOMES

Object	Object to hearsay and raise confrontation issues.
Cite	Cite the U.S. and Mississippi constitution when you object.
Raise	Raise sufficiency of the evidence, as this can be a legal error which has a high rate of review.

FOLLOW THESE RULES TO IMPROVE YOUR APPELLATE OUTCOMES

Proffer	Make a proffer of the harm the court commits when it excludes your evidence or experts.
Object	Object to the disposition reasoning.
Ensure	Ensure the court makes findings when it makes a ruling.
Ask	Ask the court for what it is relying on and the legal basis when it makes a ruling, as “overruled” or “sustained” is not enough for preservation.



Maybe.



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