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The Zombie Pandemic in Florida

Anita A. DiGiacomo, Esq.

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A zombie is currently defined as “an animated corpse that feeds on living human flesh.”

The Centers for Disease Control and Prevention\(^2\) contend that zombies are typically “created by an infectious virus,\(^3\) which is passed on via bites and contact with bodily fluids.”\(^4\) The vehicle for the spread of infection will depend on the nature of the virus that causes the zombie outbreak. However, due to the nature of zombies,\(^5\) it is more than likely that the main mode of transferring the virus, will be through bites or scratches.\(^6\) The zombie body consists of the reanimated human body, and as such, does not have extra abilities that the human body would not naturally possess.\(^7\) Many have speculated on the exact motivation of zombies,\(^8\) but regardless of their motivation, the outcome of their actions is destruction.\(^9\) The only way to permanently stop a zombie is by obliterating its brain.\(^10\) This is done by shooting, slicing into, or bashing a zombie in the head.\(^11\)

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\(^2\) Created July 1, 1946, the Centers for Disease Control and Prevention (or “CDC”) was designed to help fight malaria and aid in disease control. http://www.cdc.gov/about/history/ourstory.htm (last visited April 24, 2012). The CDC’s goals have expanded since then, it has become globally recognized, and today the “CDC is the nation’s premier health promotion, prevention, and preparedness agency and a global leader in public health.” Id.
\(^3\) Referred to as “infection” or “the infection.”
\(^5\) See infra note 7.
\(^6\) RESIDENT EVIL (Screen Gems Entertainment Company 2002).
\(^7\) Brooks, supra note 1, at 6.
\(^8\) Zombies want to devour living flesh. Id. at 18. Zombies have a love of eating brains. Khan, supra note 1. There may never be a full understanding of what drives zombies. Their actions will make very clear, very quickly, the danger behind those unknown motives. DAWN OF THE DEAD (Universal Pictures 2004).
\(^9\) Zombies attack living things, cause injury, infection, and or death. Id.
\(^10\) Brooks, supra note 1, at 19. After all, we are “[j]ust a brain kept alive by a complex and vulnerable machine we call the body[.]” MAX BROOKS, WORLD WAR Z: AN ORAL HISTORY OF THE ZOMBIE WAR 35, (1st ed. 2006). The zombie mind survives independently from the body, though the body is still used by the brain. Id.
\(^11\) There are many creative and interesting ways to “kill” a zombie. ZOMBIELAND (Columbia Pictures 2009).
This paper will provide a legal guide for the living, during the chaos and lawlessness of what the Centers for Disease Control and Prevention have termed the “zombie apocalypse.”\textsuperscript{12} Specifically, this paper will begin by providing an overview of the current laws in Florida governing physician-assisted suicide and assisted suicide outside the medical setting. Next, it will discuss the legality of protecting oneself from zombies and other individuals. This paper will not make thorough distinctions based on how extensive in scale the outbreak will be, nor will it delve into the potential causes of the outbreak. The main goals of this paper are to begin the legal discussion on “zombie law,”\textsuperscript{13} and to serve as a reference to those wishing to know their legal standpoints before ending their lives or the lives of others (in Florida) during the zombie apocalypse.

\section*{I. Physician-Assisted Suicide}

The court has stated that it has the purpose of protecting the lives of those who wish to live “no matter what their circumstances.”\textsuperscript{14} Surely, no court could have had in mind the prospect of the advocates of living dead using that same rational to promulgate ideas that could lead to further spread of infection.\textsuperscript{15} Those who are newly infected and seeking treatment will more than likely make their way to a hospital or medical center. While seeking treatment, a patient will learn that he or she is infected and what infection entails. By this point in time, the infection will have spread and the patient will be suffering greatly.\textsuperscript{16} The issue of physician-
assisted suicide is raised for the patient who does not want to suffer and die, only to become a zombie.

A. The Current System

Our healthcare system and the laws that govern the care of individuals are dependent upon established standards of care for the differing categories and classifications of healthcare providers.\(^17\) “Developing bioethical issues, by their nature, generate professional discussion, professional publication, and usually, although not always, development of a general consensus.”\(^18\) This consensus is used to help decide policies and procedures in hospitals, advances regulatory guidelines, and develops professional standards of care.\(^19\) These standards are then adopted by the courts, the legislature, and are ever-changing with the times.\(^20\) While ever-changing, the slow process by which the healthcare system resolves bioethical issues would hardly be able to timely respond to the spread of infection in an area.\(^21\) Assuming that such a system would be in place once society had recovered from the initial sweep of infection, many of the traditional ways of thinking about life and death would likely change with the understanding of a disease that changed the rules of life itself.\(^22\)

Currently, governed by Florida statute, “every person deliberately assisting a person in the commission of ‘self-murder’ shall be guilty of manslaughter, a felony of the second


\(^{18}\) Id. at 606.

\(^{19}\) Id.

\(^{20}\) Id.

\(^{21}\) Along with the spread of infection comes destruction of our organized system and naturally, barriers in communication would result from power outages and the like (people would not have the internet or phones to freely communicate with each other). The Walking Dead; TS-19 (AMC television December 5, 2010). The infection would be difficult and dangerous to study due to the nature of zombies. Id. It is also very likely that medical centers would be overrun and become some of the most dangerous places to find yourself. The Walking Dead; Tell it to the Frogs (AMC television November 14, 2010).

\(^{22}\) Id.
degree." By the terms of this statute, a healthcare provider assisting in the suicide of a patient would be guilty of manslaughter. The Supreme Court of Florida has held that the statute is rationally related to legitimate governmental interest. The interests cited by the courts were along the lines of protecting the young, the old, those with unmanaged pain, those with mental disorders, the poor, the disabled, the terminally ill, and those vulnerable to indifference, prejudice, psychological and financial pressures. Accordingly, the courts have taken interest in research available on the subject of suicide. Studies showed that once their depression and pain were adequately treated, people withdrew their requests for physician-assisted suicide and became grateful to live. Additionally, the research showed that “95% of those who commit suicide had a major psychiatric illness at the time of death.” However, in Florida, it was decided that the final decisions on physician-assisted suicide are to be made by the legislature. Florida’s legislature has not allowed for physician-assisted suicide to date. There is also “no federal interest in assisted suicide guaranteed by the federal Due Process Clause” or Equal Protection Clauses.

It is important to note that there are logical and legal distinctions between physician-assisted suicide and refusing medical treatment. The two different topics are often conflated, but it is important to distinguish the two, due to the possibility of post mortem reanimation of an

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24 Stark, supra note 17, at 611. In 1997, the Supreme Court of Florida decided upon the constitutionality of the ban on physician-assisted suicide, it was found constitutional. Krischer 697 So. 2d 97.
25 Id.
27 Id.
28 Id.
29 Krischer, 679 So. 2d 97 at 103.
30 Stark, supra note 17, at 627.
31 The Florida Statute prohibiting assisted suicide (§ 782.08) was first enacted in 1868. Thus, the legislature and public policy on the matter have been clear for some time. Krischer, 697 So. 2d 97 at 100.
32 Id. at 99-100.
33 Id.
individual barring action.\textsuperscript{34} One may legally forgo life-sustaining medical treatment, but not induce another to commit an “affirmative act designed to cause death.”\textsuperscript{35} In the case of the infected, that affirmative act would be to destroy the brain.\textsuperscript{36} On the other hand, “[w]hen a life-sustaining treatment is denied, the patient dies primarily because of an underlying disease.\textsuperscript{37} The illness simply is resuming its natural course without being slowed by treatment, rather than being circumvented by some other agent or means.\textsuperscript{38} The refusal of life-sustaining medical treatment is in fact legal.\textsuperscript{39}

\textbf{B. A Further look Into the Opposing Standpoints}

\textbf{i. Proponents of Physician-Assisted Suicide}

Proponents of assisted suicide claim “a fundamental liberty interest in choosing the ‘timing and manner of one’s death,’” protected by the Due Process Clause.\textsuperscript{40} They claim a right to “bring about impending death in a certain, humane, and dignified manner.”\textsuperscript{41} For those who are infected, understand that zombies are in fact dead, and are familiar with the nature of zombies, there may be a desperate need to protect against becoming a zombie.\textsuperscript{42}

An individual’s fear of becoming a burden while alive has been listed as a motivator for assisted suicide.\textsuperscript{43} The burden on loved ones and society becomes that much greater when you also become a danger to all those around you. Knowing this impending doom is looming, and

\textsuperscript{34} \textsc{DAWN OF THE DEAD} (Universal Pictures 2004).
\textsuperscript{35} \textsc{Krischer}, 697 So. 2d 97 at 102.
\textsuperscript{36} \textsc{Brooks}, supra note 1, at 19.
\textsuperscript{37} \textsc{Krischer}, 697 So. 2d 97 at 103.
\textsuperscript{38} \textit{Id.}
\textsuperscript{39} \textit{Id} at 100.
\textsuperscript{40}\textsc{Compassion in Dying v. Washington}, 79 F.3d 790, 793 (9th Cir. Wash. 1996).
\textsuperscript{41} \textit{Id.}
\textsuperscript{42} Those infected often choose to take their own lives, sometimes expressing wishes to avoid becoming “one of them, walking around without a soul.” \textsc{Resident Evil} (Screen Gems Entertainment Company 2002).
becoming much more than a simple burden on resources,\textsuperscript{44} “feeling duty-bound to ‘die and get out of the way’”\textsuperscript{45} will be (or will seem like) a more meritorious decision. “In a perfect world, no one benefits or profits from the decision [to commit suicide], except perhaps the patient . . . America, unfortunately, is not a perfect world.”\textsuperscript{46}

There is a school of thought that fears the criminal treatment of physicians, and puts physicians in a defensive standpoint.\textsuperscript{47} Weary of prosecution, the physicians do not administer adequate pain relief, for fear of penalty.\textsuperscript{48} Also, “[t]he notion that pain is a test of endurance and will permeates Western Culture.”\textsuperscript{49} It is important to note the possibility of senseless suffering due to fears of hastening death. Very real harm may be done to anyone dying, not just those dying of the infection when too hard of a line is drawn between assisted suicide and a natural death.

\textbf{ii. Opponents of Physician Assisted Suicide}

Hubert Humphrey (the 38\textsuperscript{th} vice president of the United States) observed, “[t]he moral test of a government is how that government treats . . . the sick, the needy, and the handicapped.”\textsuperscript{50} This statement embodies the standpoint of those morally opposed to assisted suicide.\textsuperscript{51}

\begin{itemize}
\item \textsuperscript{44} The threat of financial ruin being left behind for loved ones may seem like a compelling enough reason to kill oneself, even for patients who may desperately wish to live. \textit{Id.} at 920.
\item \textsuperscript{45} \textit{Id.}
\item \textsuperscript{46} \textit{Id.} at 918.
\item \textsuperscript{48} \textit{Id.}
\item \textsuperscript{49} \textit{Id.}
\item \textsuperscript{50} Fred Barnes, Life of the Party, Wkly. Standard, Apr. 11, 2005, at 7.
\item \textsuperscript{51} Opponents of assisted suicide may be under the mistaken assumption that zombies are still alive. \textit{The Walking Dead; Nebraska} (AMC television broadcast February 12, 2012).
\end{itemize}
One of the more interesting claims offered by the opponents of assisted suicide is that voluntary and possibly involuntary euthanasia may one day be constitutionally mandated. In the case of a zombie, where he or she poses a threat to other members of society, especially the uninfected, this claim may have added merit. Those who fear for their safety would likely support a government eradication of zombies. The thought of slaying droves of infected individuals and of their zombie counterparts, in an attempt to extinguish a rampant and dangerous infection, may sound especially horrific to anyone with little or no experience with the zombie threat. When all of humanity hangs in the balance, involuntary euthanasia of those who are infected or are zombies may seem like a valid option. However, in the case of the living, infected individuals, this course of action would be a violation of the inalienable rights of life, liberty, and the pursuit of happiness.

Another particularly apt argument is that a continued prohibition of assisted suicide will compel the continued search to seek an alternative. That alternative may be for better care of the infected, more reasonable means of securing zombies (in hopes that the process is reversible), a much sought-after cure, or even a vaccine to the disease altogether. If the saying, “out of sight, out of mind” has any truth in connection with this situation, there may be devastating consequences of simply extinguishing the threat by taking the lives of those who are infected and that have become zombies. An interesting question, not yet asked, is if we as a people exterminate all those connected with the zombie threat, where will the killing end?

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52 Stephanie Graboyes-Russo, supra note 43, at 911.
53 Sam Harris, mentions the nature of people and people’s gut reaction to save many lives while sacrificing a few in his book, The Moral Landscape. SAM HARRIS, THE MORAL LANDSCAPE, on tape (1st ed. 2010).
55 Stephanie Graboyes-Russo, supra note 43, at 912.
56 John Heywood's Woorkes. A dialogue conteynyng prouerbes and epigrammes, 1562, as reprinted by the Spenser Society, 1867. Possibly being the origin of the saying.
57 At very least, “the prohibition on physician-assisted suicide provides health care professionals with a tremendous incentive to improve and expand the availability of” good end of life care. Brief of the American Medical Association et al. as Amici Curiae in Support of Petitioners, Vacco v. Quill, 80 F. 3d 716 (2d Cir.).
extend to anyone with a communicable disease deemed dangerous to society? Let us not forget events like the Holocaust, and just how far people have gone given a perceived threat.\textsuperscript{58} Lastly, it is also important to note that “the least costly treatment for any illness is lethal medication.”\textsuperscript{59} In our fiscally driven society, such a poor motivator for suicide should not be overlooked.

\section*{II. Self Defense}

The absurd question of whether zombies are alive or dead means nothing to someone in the process of being attacked or consumed by one of them. Whether or not there is an understanding of how the disease is spread, once people become familiar with zombies’ aggressive nature, they will attempt to protect themselves.\textsuperscript{60}

\subsection*{A. Infected Non-Threatening}

Euthanasia is not a defense to murder.\textsuperscript{61} The shooting death of an individual constitutes murder, rather than assisting self-murder, when the shooter is not the victim.\textsuperscript{62} In the case where the victim is the one who performs the act of killing himself, with only the assistance of another, the living defendant would be charged with “deliberately assisting another in the commission of self-murder.”\textsuperscript{63}

\footnotesize
\textsuperscript{58} Stephanie Graboyes-Russo, \textit{supra} note 43, at 933.
\textsuperscript{59} \textit{Compassion in Dying}, 79 F.3d 790.
\textsuperscript{60} \textit{DAWN OF THE DEAD} (Universal Pictures 2004).
\textsuperscript{63} Fla. Stat. § 782.08 (2012). In a case where the defendant gave the victim a gun, even without thinking he was serious about his intent to kill himself, upon the victim killing himself, the defendant became guilty of assisting self murder. State v. Adams, 683 So. 2d 517, 518 (Fla. Dist. Ct. App. 2d Dist. 1996).
At common law, suicide was a crime, “punishable by forfeiture of the goods and chattels of the offender, and the ignominious burial of his body in the highway.” This was thought to be unfair to the families left behind and was abolished. Making suicide a crime again is an interesting prospect to consider, given the possibility that someone who may have tried to kill himself and succeeded in the traditional sense, but who had the poor luck of coming back as a zombie may be tried for a crime. The law has never had the option of trying the person who committed suicide, and at one point considered the act of suicide so heinous an act as to punish the perpetrator’s family. Were it possible to punish the perpetrator of the suicide, like in the case of a person who becomes a zombie, it would be interesting to see what the legislature would come up with. Considering the harm a zombie may wreak on society, people who recklessly commit suicide, without regard for others, are good candidates for punishment.

B. The Zombie Threat Outside the “Castle”

At the stage where there is an immediate threat to the public, the infected will have gone through the transformation of becoming a zombie or zombies. To reiterate, the main goal of the zombie or zombies, is accomplished by being a threat to and causing harm to those who are not other zombies. Under section 776.032, Florida Statutes, immunity is granted from prosecution and civil action for justifiable use of force. Justifiable force includes deadly force, if in defense of others, person, or when in one’s castle (dwelling, residence, or vehicle).

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64 83 C.J.S. Suicide § 2 at 782 (1953).
66 Perhaps defined as allowing oneself to become a zombie, or not restraining oneself for if one does become a zombie.
68 Immunity completely bars the criminal prosecution and possibility for civil action against an individual. See Fla. Stat. § 776.032 (2012):
   (1) A person who uses force as permitted in s. 776.012, s. 776.013, or s. 776.031 is justified in using such force and is immune from criminal prosecution and civil action for the use of such
force, unless the person against whom force was used is a law enforcement officer, as defined in s. 943.10(14), who was acting in the performance of his or her official duties and the officer identified himself or herself in accordance with any applicable law or the person using force knew or reasonably should have known that the person was a law enforcement officer. As used in this subsection, the term “criminal prosecution” includes arresting, detaining in custody, and charging or prosecuting the defendant.

(2) A law enforcement agency may use standard procedures for investigating the use of force as described in subsection (1), but the agency may not arrest the person for using force unless it determines that there is probable cause that the force that was used was unlawful.

(3) The court shall award reasonable attorney's fees, court costs, compensation for loss of income, and all expenses incurred by the defendant in defense of any civil action brought by a plaintiff if the court finds that the defendant is immune from prosecution as provided in subsection (1).

See Fla. Stat. § 776.031:
A person is justified in the use of force, except deadly force, against another when and to the extent that the person reasonably believes that such conduct is necessary to prevent or terminate the other's trespass on, or other tortious or criminal interference with, either real property other than a dwelling or personal property, lawfully in his or her possession or in the possession of another who is a member of his or her immediate family or household or of a person whose property he or she has a legal duty to protect. However, the person is justified in the use of deadly force only if he or she reasonably believes that such force is necessary to prevent the imminent commission of a forcible felony. A person does not have a duty to retreat if the person is in a place where he or she has a right to be.

Pursuant to section 776.012, Florida Statutes:
A person is justified in using force, except deadly force, against another when and to the extent that the person reasonably believes that such conduct is necessary to defend himself or herself or another against the other's imminent use of unlawful force. However, a person is justified in the use of deadly force and does not have a duty to retreat if:

(1) He or she reasonably believes that such force is necessary to prevent imminent death or great bodily harm to himself or herself or another or to prevent the imminent commission of a forcible felony; or

(2) Under those circumstances permitted pursuant to s. 776.013.

Section 776.013, Florida Statutes, provides that:

(1) A person is presumed to have held a reasonable fear of imminent peril of death or great bodily harm to himself or herself or another when using defensive force that is intended or likely to cause death or great bodily harm to another if:

(a) The person against whom the defensive force was used was in the process of unlawfully and forcefully entering, or had unlawfully and forcibly entered, a dwelling, residence, or occupied vehicle, or if that person had removed or was attempting to remove another against that person's will from the dwelling, residence, or occupied vehicle; and

(b) The person who uses defensive force knew or had reason to believe that an unlawful and forcible entry or unlawful and forcible act was occurring or had occurred.

(2) The presumption set forth in subsection (1) does not apply if:

(a) The person against whom the defensive force is used has the right to be in or is a lawful resident of the dwelling, residence, or vehicle, such as an owner, lessee, or titleholder, and there is not an injunction for protection from domestic violence or a written pretrial supervision order of no contact against that person; or

(b) The person or persons sought to be removed is a child or grandchild, or is otherwise in the lawful custody or under the lawful guardianship of, the person against whom the defensive force is used; or

(c) The person who uses defensive force is engaged in an unlawful activity or is using the dwelling, residence, or occupied vehicle to further an unlawful activity; or

(d) The person against whom the defensive force is used is a law enforcement officer, as defined in s. 943.10(14), who enters or attempts to enter a dwelling, residence, or vehicle in the performance of his or her official duties and the officer identified himself or herself
When not in one’s castle, and encountering a hostile zombie on the street, one may look to the “stand your ground” law for guidance. Under this law, if an individual perceives a threat, they need not retreat and may react violently. Since a zombie will continue to pursue a target until the zombie is destroyed, people will likely use lethal force against zombies. Because a person acting in self-defense does not need to prove any actual threat, though a threat would not be hard to prove, no second thought would be given to destroying zombies.

Where an individual kills an infected individual who is not yet a zombie, an argument may exist as to whether there was actually a perceived threat. This is where the problem lies: in killing those who are clearly infected but who have not yet become zombies. An infected individual may not currently be attacking anyone and may be fleeing for his or her life, like anyone else who is not a zombie. If the infection is fast-acting, and there are only seconds to kill the individual before that individual harms you, and you perceive them as a threat, is it legal to...

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(3) A person who is not engaged in an unlawful activity and who is attacked in any other place where he or she has a right to be has no duty to retreat and has the right to stand his or her ground and meet force with force, including deadly force if he or she reasonably believes it is necessary to do so to prevent death or great bodily harm to himself or herself or another or to prevent the commission of a forcible felony.

(4) A person who unlawfully and by force enters or attempts to enter a person's dwelling, residence, or occupied vehicle is presumed to be doing so with the intent to commit an unlawful act involving force or violence.

(5) As used in this section, the term:

(a) “Dwelling” means a building or conveyance of any kind, including any attached porch, whether the building or conveyance is temporary or permanent, mobile or immobile, which has a roof over it, including a tent, and is designed to be occupied by people lodging therein at night.

(b) “Residence” means a dwelling in which a person resides either temporarily or permanently or is visiting as an invited guest.

(c) “Vehicle” means a conveyance of any kind, whether or not motorized, which is designed to transport people or property. *Id.*

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74 *DAWN OF THE DEAD* (Universal Pictures 2004).
75 *Id.*
76 Fla. Stat. § 776.012.
use deadly force on them? It would seem so, but what would the rationale be in using deadly force, if the progression of an individual’s infection was slow-acting? If an individual who can claim a perceived threat can shoot infected people they come in contact with, what’s to stop infected people from shooting at non-infected people, in fear for their lives? Under the current law, “a person is permitted to harm, or even kill, another before considering whether an actual threat exists.” People may become as dangerous to each other as the zombies.

C. The Zombie Threat Within the “Castle”

When an intruder, zombie or otherwise, encounters and individual in his or her dwelling, residence, or occupied vehicle (those areas make up a person’s “castle”), the individual legally in his or her castle may use defensive force against said intruder. That defensive force may include deadly force. Because there is a presumption of reasonable fear, the actor need not assert that he or she had a reasonable fear. There may be moral concerns with shooting an individual who is entering a home or trying to get into a car with hopes of finding solace and safety, but there are no legal concerns.

III. Conclusion

77 In cases where there is little time between a person becoming infected and then being attacked by said person, some people may kill infected individuals “in a heartbeat.” 28 DAYS LATER (20th Century Fox 2002).
79 Resident Evil (Screen Gems Entertainment Company 2002). This course of action leads to the conclusion that no actual threat exists before someone becomes a zombie. Id.
82 Id.
83 Id. at 1.
84 Id.
“Calls for suicide are symptoms of a failing system, not solutions.” I agree. In the case at hand, the system will have failed and there will be no foreseeable solutions. It would not be constitutional to force the killing of people who are infected, but given the dire circumstances, stopping people who are infected from ending their misery and the potential to harm others as mindless zombies, would be against the interests of the human race and give new fire to constitutional claims.

Due Process arguments to end one’s life in a dignified manner (through physician assisted suicide) will likely have a revival, given the considerably different circumstances one would be in, if left to die of natural causes. Faced with the option of becoming a gruesome sight and danger to society, or in fear of zombies, hopefully the Florida legislature will have a greater incentive to uphold the rights of individuals and act accordingly.

The right to end one’s life in a dignified manner should also be extended to assisted suicide outside of the medical setting, done by those who may not be licensed physicians. There may be a point where hospitals are overrun, and those around an infected individual may be the only ones he/she may turn to help ease suffering.

There is obviously a lot of room for abuse and there will not be a good system in place to protect would be victims of said abuse. Formulating a system to assure that no one may benefit financially (or otherwise) from the demise of another at his or her hands should be looked into immediately, before a zombie pandemic. As with most things in life, “an ounce of prevention is worth a pound of cure.” To even keep a system of government going may be difficult, so

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85 Graboyes-Russo, supra note 43 at 934.
86 The door is open for the Florida legislature to craft a physician assisted suicide statute, but until then, it is not for the courts to decide upon the issue. *Krischer v. McIver*, 697 So. 2d 97, 107 (Fla. 1997).
87 Logically the first place an injured person would go is a hospital, making hospitals a very dangerous place. *The Walking Dead; Tell it to the Frogs* (AMC television November 14, 2010). Hospitals may be overrun by zombies and the infected, leaving authorities with no other options then to back away. *Id.*
planning for the apocalypse should be done as far in advance as possible. The Centers for Disease Control and Prevention have taken a “better safe than sorry” standpoint to preparing the supplies and an emergency plan necessary to survive this pandemic.\textsuperscript{90} They claim to have a plan in place, including isolation of those infected and a study of the disease, along with a promise to assist infected cities.\textsuperscript{91} Were the whole of the United States (let alone the world) to be affected by the zombie pandemic, it is extremely unlikely that the CDC would be able to help the individual very much in his/her struggle for survival.\textsuperscript{92} Each individual will likely have to care for herself/himself until help arrives.

There will likely be foolish push back, by those who believe zombies to be living beings, against allowing assisted suicide. This, if left unchecked, will lead to further damage by the zombie pandemic. Eventually most people come to the understanding that zombies are not alive.\textsuperscript{93} For the sake of mankind, I hope this realization comes sooner rather than later.

It is good practice to be able to destroy zombies, at any time and at any place, with no legal repercussions to follow. The human race will be in a battle for existence, and the last thing we need are people being worried about spending the rest of their lives in legal battles when (and if) the world recovers. The Florida statute’s regarding self defense and defense of one’s castle,
paired with Florida’s liberal gun laws,\textsuperscript{94} make this state a very good place to live, and to legally protect oneself from the zombie threat.

In the event of a zombie pandemic, the best legal option left to the people of this state, would be to stock up on guns and supplies, and remain at their residence or domicile, where they may find shelter and freely defend themselves. Within the castle, people are the most free to protect themselves.

\textsuperscript{94} Fla. Stat. § 790.06.