

THE STATE OF SOUTH CAROLINA
IN THE COURT of Appeals

APPEAL FROM YORK COUNTY
COURT OF GENERAL SESSIONS
William A. McKinnon, Chief Judge

RECEIVED

SEP 22 2022

SC Court of Appeals

1998-GS-46-2847;2849;2851

Appellate Case No:2021-001280

STATE OF SOUTH CAROLINA,

Respondent,

v.

ANTONIO GORDON,

Appellant.

PETITION FOR SECOND OR SUCCESSIVE POST-CONVICTION RELIEF

South Carolina Attorney General Office.

Antonio Gordon#259798

William Blitch Jr., Attorney General

P.O. Box

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I.

The records in this case reflects that on July 23,1998, the Appellant was sixteen years of age when he was **found violating a criminal law and taken into "Family Court"** custody /jurisdiction based on probable cause. See ROA Volume one Pages 80 Line 16-pg 83 Lone 16- pg 88 Line 24-pg 89 Line 10 (Pre Trial Transcript Detective John Thickens Testimony); ROA Volume One Pg 208 Line 19-24 (Pre Trial Transcript Captain Charles Cabiness Testimony); ROA Volume One Pg 138 Line 11 Pg 139 Line 1 (Pre Trial Transcript, Trial Court denying motion to suppress finding there was probable cause to make a warrantless arrest). See Fn1 The record in this case demonstrate law enforcement did notify the Appellant parents according to statutory law. See ROA Volume One Pg 144 Line 16- Pg 146 (Pre Trial Transcript, Trial Court finding Appellant parents were notified under S.C. Code Ann 20-7-7205(A) (Supp.1998) Titled "Taking a Child into Custody" statute and denied counsel motion to suppress the Appellant confession).

Fn1 Approximately 6 to 8 hours after the Defendant was taken into custody he appeared before a city recorder and signed an arrest warrant for murder. ROA Volume One Pg 89 Line 13- Pg 90 Line 12. On July 27, 1998, the Appellant were served arrest warrants for 2 counts of attempted armed robbery, possession of a weapon during the commission of a violent crime, possession of a pistol by a person under twenty one, criminal conspiracy,. The Appellant was appointed Dan Agostino Esq to represent him in General Sessions court.

On October 19,1998, the York County Grand Jury did during a time "**Family Court**" retained jurisdiction, True Billed indictments for murder, 2 counts of attempted armed robbery, 3 counts of possession of a weapon during the commission of a violent crime, possession of a pistol by a person under twenty one , criminal conspiracy and carjacking. See ROA Volume One Pg 225-247 (Indictments).

On July 16,1999, after a Jackson v. Denno hearing the Defendant pled guilty to the true billed indictments in General Sessions Court "**without Family Court first providing a hearing, notice, counsel and a statement of reason in a order transferring it's first attached jurisdiction**". On July 19, 1999, the Honorable John C. Hayes, III, sentenced the Appellant to 30 years for murder, 5 years for each possession of a weapon during the commission of a violent crime, 5 years for possession of a pistol by a person under, twenty-one. 5 years for criminal conspiracy, 10 years for each attempted armed robbery with one of the 10 years ran consecutive to the 30-year murder charge and the carjacking was dismissed. See ROA Volume One Pg 225-247 (Warrants, Indictments, and sentencing sheets).

Appellant filed his first post-conviction relief application under section 17-27-20(1). **(2000-cp-46-1414)**. In the application Gordon asserted as a ground for relief (a) "**Ineffective assistance of counsel pursuant to family court matters**". ROA Volume one pages 248-254.

The Appellant filed a second post-conviction relief application under section 17-27-20(2). **(2001-cp-46-1866)**. In the application,, Gordon asserted as a ground for relief "**{S}subject**

matter jurisdiction” (b) “Family Court never relinquished its first acquired jurisdiction”.
See ROA volume one pages 254-261.

Under Rule 15(b) of the SCRPC and section, 17-27-90 Gordon amended his jurisdiction claim and asserted other constitutional challenges to the children’s code of laws See ROA Volume one page 262-274.

Appellant was court-appointed Tara D. Shurling, Esq to represent him in the matter as required by Rule 71.1(d) SCRPC.

The State made a Return to the applications as required by section 17-27-70(a) but did not address Gordon’s jurisdiction claim. See ROA Volume one pages 275(A)-275(d).

An order changing venue was issued transferring Gordon’s case to Richland County in which both of Plaintiff applications were consolidated and will be referred to as ***PCR (1414).*** ROA Volume one pages 276(A)-276-277.

An evidentiary hearing was convened on July 29, 2003, before the Honorable Earnest Kinard Jr. PCR counsel Shurling, Esq informed the PCR court: ***“Your Honor, my client also alleges that his indictment is faulty in that he was indicted by the Court of General Sessions and tried as an adult without trial counsel having---and this is actually more of a sixth amendment argument, although my client couched it in terms of subject matter jurisdiction”.*** See ROA Volume one pages 285 line 15-287 line 16 (PCR Transcript). Counsel proceeded to inform the Court that Gordon asked her to argue his jurisdiction claims and other constitutional claims and ineffective assistance of counsel claims relating to him being tried as an adult without the family court first relinquishing its jurisdiction in an order with a statement of reason. See ROA Volume one pages 286 line 15- page 287 line 10.

Without no legal argument presented during the PCR hearing on Appellant jurisdiction claim by neither party and at the conclusion of the hearing the court instructed the Respondent to prepare a proposed order. ***(TAKE NOTICE OF PCR TRANSCRIPT IN ITS ENTIRITY) ROA Volume one Pg 278-342.*** As instructed by the court the State prepared the order making specific findings of fact and conclusion of law as required by section 17-27-80. However, At claim 5 of the order the State amended their Return and answered Gordon jurisdiction claims out of time according to Rule 8(c) and 12(b) and 15(b) SCRPC and section 17-27-70(a) when the Respondent injected the language in the order that ***“Pursuant to S.C. Code Ann 20-7-6605, a person sixteen years of age or older who is charged with a Class A,B, C, or D felony as defined in section 16-1-20 or a felony which provides a maximum term of imprisonment of fifteen years or more maybe remanded to the family court for disposition of the charge at the discretion of the solicitor. The Applicant was sixteen years old when he committed the crimes for which he was indicted and the crimes committed were Class A, B, C, or D felonies. Therefore, the General Sessions Court had jurisdiction”.*** See ROA Volume one pages 355 line 2-8 (PCR Order issued August 18th, 2003).

The PCR court signed the order as making specific finding of fact and conclusion of law as required by section 17-27-80 without Gordon first being giving ***adequate notice in advance and the opportunity to respond*** under section 17-27-70(b) and Rule 12 of the SCRPC prior to judgment being issued on the State claim that ***“Pursuant to S.C. Code Ann 20-7-6605, a person sixteen years of age or older is charged with a Class A,B, C, or D felony as defined in section 16-1-20 or a felony which provides a maximum term of***

imprisonment of fifteen years or more maybe remanded to the family court for disposition of the charge at the discretion of the solicitor. The Applicant was sixteen years old when he committed the crimes for which he was indicted and the crimes committed were Class A, B, C, or D felonies. Therefore, the General Sessions Court had jurisdiction". ROA Volume one page 355 first paragraph.

The record reflects Gordon asked PCR counsel to file a Rule 59(e) motion and a Rule 60(b), SCRCP motion. See ROA Volume one pages 366 line 16-page 367 line 2 (***Letter from PCR counsel Tara Shurling, Esq to Ms. Richardson***). Counsel stated in her opinion there was no need for such motions and filed a Notice of Appeal in the case.

The Appellant filed a pro se Motion for reconsideration of facts in attempt to protect his procedural right to one full fair bite at the apple. The Court found that all claims raised in the application were rule on by the court and because Gordon received the order way after the initial appeal in this case, he filed a belated appeal in the South Carolina Supreme Court in which the Court vacated the PCR court order denying the pro se motion as well denied Gordon request to file a belated appeal and post-conviction relief application. See ROA Volume one page 365. (Order issued from this Court) not dated).

The Appellant filed three (3) more applications and reasserted the same jurisdictional claims and the State has asked each court to deny the applications as being time-barred and successive under the uniform post-conviction relief act and each court ruled as such.

In Appellant's last PCR application 2008-cp-46-4951, the State filed a motion with the court to restrict Gordon from filing any future post-conviction relief applications that raised or could have raised claims in previous applications. However, in the State motion, it is alleged Gordon has had more than his fair bite at the apple and showed the court that in every PCR application Gordon asserted his jurisdictional claims. See ROA Volume two pages 17,21-page 25 (***Motion to Restrict Gordon from future filing filed by the state.***) The Court issued an order restricting Gordon from filing any future PCR applications that raised claims that was raised in previous applications or could have been raised in previous applications and that ineffective assistance of PCR counsel is not a reason to have a second PCR application. See ROA Volume two page 59 (***Order Restricting future filings.***).

The Appellant eventually filed a Declaratory Judgment in the South Carolina Supreme Court original jurisdiction asking the court to find the Uniform Post- Conviction Relief Act was unconstitutional because it did not provide a judicial remedy to remedy the ineffective assistance of pcr counsel. The court denied the petition and held that the Court and the lower courts have said no as to his ineffective assistance of pcr counsel claim that PCR counsel inadequately raised his jurisdictional claims as ineffective assistance of counsel. See ROA Volume two pages 74-75 (***Order from the Supreme Court issued on June 20,2019***) ***Rehearing Order issued on November 19,2019.*** Appellant have filed other motions in attempt to receive his "***procedural right to one full fair bite at the apple***".

On September 9, 2021, Appellant filed a ***Motion To Vacate Conviction and sentence based on Lack of a Subject Matter Jurisdiction.*** See ROA Volume two pages 575-586. In the Motion Appellant asserted General Sessions court was without jurisdiction to accept his guilty plea and sentence him as an adult offender to a term of year's of imprisonment because

- (A) when the Grand Jury True Bill his indictments, the court of General Sessions did not have jurisdiction. ROA Volume Two page 580
- (B) When he was found violating a criminal law and taken into custody **based on probable cause family court acquired the first jurisdiction** under S.C. Code Ann 20-7-7205(a) (Supp.1998) Title "Taking a Child into custody"; 20-7-6605(1),(2) (Supp. 1998) Title "Definition"; 20-7-400(a),(1),(d) (Supp.1998) Title "Exclusive Original Jurisdiction of Family Court". ROA volume Two page 580

Appellant asserted that before the York County Grand Jury could true bill his indictments Appellant was :

- (1) Entitled to a hearing, counsel and a statement of reason with an order transferring jurisdiction to general sessions under sections 20-7-400(a),(1),(d), supra and S.C. Code Ann 20-7-7605(6) (Supp.1998) Title "Transfer of Jurisdiction"; **Kent v. United States**, the 86 Sct 1045 (1966). ROA Volume Two page 580

Appellant also asserted that:

- (2) The Children Code of Laws Act was unconstitutionally vague under the due process clauses of South Carolina Constitution Article one section 3 and the 14th amendment to the United States Constitution as applied to him because the term "who is Charged" or the term "[Charged]" as outlined in section 20-7-6605(1) of the Children Code of Laws Act does not set forth the proper standard for adjudication as applied to him being **"sixteen years of age found violating a criminal law and taken into family court custody/jurisdiction based on probable" under sections 20-7-7205(a);20-7-6605(1),(2);20-7-400(a),(1),(d). Appellant asserted his conviction under it was not merely erroneous, but illegal and void under Ex Parte Siebold 100 U.S. 371-77 (1879) holding. ROA volume Two page 82 Fn2 through page 581**
- (3) Appellant asserted that even though he faced mandatory bind over under section 20-7-6605(1) of the Children code of laws Act, there should have first been a Petition filed under section 20-7-7605(6) alleging Appellant was found violating a criminal law and taken into family court custody/jurisdiction based on probable cause and that he is charged with a Class A, B, C, or D felony under section 20-7-6605(1). ROA Volume Two Page 581 Fn3

For the first time the Appellant asserted that he had been denied his fundamental constitutional rights to due process of law under South Carolina Constitution Article one section 3 and the 14th Amendment to the United States Constitution when the PCR court and the State "did not" provide him with adequate notice in advance and the opportunity to be heard before the signing of the order on the State claim that **"Pursuant to S.C. Code Ann 20-7-6605, a person sixteen years of age or older is charged with a Class A, B, C, or D felony as defined in section 16-1-20 or a felony which provides for a maximum term of imprisonment of fifteen years or more maybe remanded to the Family Court for disposition of the charge at the discretion of the solicitor. The Applicant was sixteen years old when he committed the crimes for which he was indicted and the crimes committed were Class A, B, C, or D felonies. Therefore, the General Sessions Court had jurisdiction". ROA Volume Two Page 583 6th paragraph- Page 86 first paragraph.**

Appellant asked the Court to exercise its authority and vacate and or reopen the PCR Judgment in PCR 2000-cp-46-1414 to properly litigate his subject matter jurisdiction claims as those similarly situated. ROA Volume two page 584 Fn4.

The trial court issued an order on October 13,2021 and filed on October 18,2021. In the order the Honorable McKinnon reopen the PCR judgment (1414) reconsidered and addressed Appellant's jurisdictional issues when the court held: "***The Court received this Handwritten motion request the court reconsider jurisdictional issues which have already been litigated in which the Court has issued orders denying relief.As previously ordered by the Court, the General Sessions court had jurisdiction over the Petitioner's guilty plea on July 16,1999. The Petitioner pled guilty to murder, three counts of possession of a weapon during the commission of a violent crime, two counts of attempted armed robbery, possession of a firearm by a person under twenty one and criminal conspiracy. Pursuant to the law at the time of his plea," a person sixteen years of age or older who is charged with a Class A, B, C, or D felony as defined in section 16-1-20 or a felony which provides for a maximum term of imprisonment of fifteen years or more "is not a juvenile and may be " to the family court for disposition of the charge at the discretion of the solicitor". See S.C. Code Ann 20-7-6605 (Now section 63-19-20). The Petitioner was sixteen years old and charged with a Class A, B, C, or D felony as defined in section 16-1-20. Consequently, the General Sessions court had jurisdiction, and the sentence and conviction shall not be vacated". The Court summarily dismissed the Appellant's Motion to Vacate Conviction and Sentence without a hearing.***ROA Volume II pages 589-590

The Respondent on Appeal contends the Appellant's claims does not allege one of subject matter jurisdiction and could not be raised for for the first time in this Court and even if the claims implicate subject matter jurisdiction the Court of General Sessions had jurisdiction.

II.

Arguments

The Appellant asserts this Court has jurisdiction to decide whether if Appellant was denied his procedural right to one full fair bite at the apple as those similarly situated and the power to decide if Appellant is entitled to a Second or successive post-conviction relief application as of right under S.C. Code Ann 17-27-90, **Odom v. State**, 337 S.C. 256,261-62, 523 SE2d 753,755-56 ("stating an applicant is entitled to a full adjudication on the merits of the original petition, or bite at the apple") and our Constitution Article 1 section 3 and the 14th amendment to the United States Constitution.

SECTION 17-27-20. Persons who may institute proceeding; exclusiveness of remedy.

(A) Any person who has been convicted of, or sentenced for, a crime and who claims:

(1) That the conviction or the sentence was in violation of the Constitution of the United States or the Constitution or laws of this State;

(2) That the court was without jurisdiction to impose sentence

SECTION 17-27-90. Grounds for relief.

All grounds for relief available to an applicant under this chapter must be raised in his original, supplemental or amended application. Any ground finally adjudicated or not so raised, or knowingly, voluntarily and intelligently waived in the proceeding that resulted in the conviction or sentence or in any other proceeding the applicant has taken to secure relief, may not be the basis for a subsequent application, unless the court finds a ground for relief asserted which for sufficient reason was not asserted or was inadequately raised in the original, supplemental or amended application.

In this case Appellant filed his first pcr (1414) alleging ineffective assistance of counsel in regards to family court matters and lack of subject matter jurisdiction namely, family court never relinquished its first attached jurisdiction. During the pcr hearing in this case pcr counsel informed the pcr court that Gordon allege his indictments was faulty as an adult and that the court of general sessions was without subject matter jurisdiction but that Appellant claim should be a sixth

amendment claim, that trial counsel never made a concerted effort as an advocate to convince the solicitor to exercise its discretion under section 20-7-6605 to have his case remanded to family court. As demonstrated in the statement of the case and pcr Transcript counsel continued to inform the pcr court that Appellant claim should be a sixth amendment constitutional claim that counsel should have constitutionally challenge the children code. ROA pages 285 line 15-pgs 289 line 11.

Gordon contends because the lower court reopen pcr judgment (1414) to properly litigate his subject matter jurisdiction claims, it must be found anew pcr counsel did in fact inadequately raise and argue Appellant's sixth amendment ineffective assistance of counsel claim pursuant to section 17-27-90 that require Gordon having a second or successive post-conviction relief pursuant to Aice v. State, 305 S.C. 448 (S.C.1991). Appellant contends that it has always been his contention that his case originated in family court the moment he was arrested and the lower court new recent ruling on Appellant's Motion to Vacate Conviction and Sentence confirms. Thus, therefore the IAC claim set forth by pcr counsel directly conflicts with his assertion that family court was the first court to attach jurisdiction and should have first had a Kent v. United States waiver hearing with an order relinquishing jurisdiction. Pcr counsel IAC claim places Gordon directly in General Sessions court jurisdiction stating counsel never made a concerted effort as an advocate to convince the solicitor to exercise its discretion under section 20-7-6605 stripping Appellant of the statutory rights outline for children less than seventeen years of age found violating a criminal law and taking into family court jurisdiction based on probable cause under section 20-7-7205(a);20-7-6605(1),(2);20-7-400(a),(1),(d);20-7-7605(1),(6) of the Children Code of Laws Act See Fn1

Fn1 Appellant asserts he wrote pcr counsel in regards to counsel being ineffective for failing to object to general sessions court jurisdiction and asked that she look into Statutes relating to him being a child. See Volume I page 275

Secondly, Appellant contends he is entitled to a Second or successive post-conviction relief because when the lower court reopen the pcr judgment to properly litigate subject matter jurisdictional claims which is caption as ***"FAILURE TO MAKE CONCERTED EFFORT TO GET THE SOLICITOR'S OFFICE TO REMAND CASE TO FAMILY COURT"***. ROA 354-355 claim 5. Gordon contends the ineffective assistance of counsel claim left in place deprive him of his fundamental constitutional rights to be heard on the merits of the original petition, or to one bite at the apple and this Court should also find as the lower court that Appellant was denied a fair bite. Third, Appellant contends this Court should find that the IAC of counsel claim, claim 5 of the pcr order is a nullity because it wasn't properly raised to the pcr court by pcr counsel pursuant to Mangal v. State, 421 S.C. 85,89,805 SE2d 568,570 (2017). In Mangal case The PCR court denied relief in a written order without addressing the improper bolstering issue. Mangal made a motion under Rule 59(e) of the South Carolina Rules of Civil Procedure to alter or

amend the judgment, arguing the PCR court should have addressed the improper bolstering issue. The PCR court denied the motion and held the improper bolstering issue was "not presented to the court in the application or in an amendment, and no testimonial evidence from the applicant was presented in support of these allegations."

Mangal filed a petition for a writ of certiorari seeking review of the denial of PCR, which we transferred to the court of appeals pursuant to Rule 243(l) of the South Carolina Appellate Court Rules. Mangal argued trial counsel was ineffective for not objecting to Dr. Henderson's testimony and the PCR court erred by not ruling on the issue. The court of appeals agreed the PCR court erred in not ruling on the improper bolstering issue. Mangal, 415 S.C. at 317-18, 781 S.E.2d at 735-36. This Court then addressed the merits of the issue, finding Dr. Henderson's testimony was improper bolstering and counsel was ineffective for not objecting to it. 415 S.C. at 319-20, 781 S.E.2d at 736-37. This court remanded to the court of general sessions for a new trial. 415 S.C. at 319-20, 781 S.E.2d at 737. The State filed a petition for a writ of certiorari for review of the court of appeals' decision, which this Court granted.

Our Supreme Court held We first address the court of appeals' ruling that the improper bolstering issue was presented to the PCR court, and thus the PCR court erred in not ruling on it. We find the PCR court acted within its discretion in refusing to address the issue. First, the written application makes no mention of a claim based on improper bolstering, and no amendment to the written application was ever made. Second, PCR counsel began the hearing without mentioning there would be any additional claims for ineffective counsel beyond those listed in the original application. Third, even when PCR counsel questioned trial counsel on why he did not object to Dr. Henderson's testimony, he did not inform the PCR court he would make a claim for ineffectiveness based on the failure to make an objection.

Fourth, when PCR counsel did finally mention an ineffectiveness claim based on the testimony of Dr. Henderson, he did not make the claim with specificity.

Appellant asserts he understands Mangal case is inapposit than his and that our Supreme Court concrete reason of affirming the pcr court judgment in Mangal case is because the State never received adequate notice. Turning to Appellant's case Mangal case share guidance as to whether pcr counsel properly presented the makeshift IAC claim before the pcr court could make specific findings of fact and conclusion of law as required under section 17-27-80. Appellant contends pcr counsel presentation of the IAC claim does not meet Mangal's principles of Laws announced by our Supreme Court.

Lastely, Appellant contends his argument must be presented in the form of being denied the opportunity to be heard under due process and to the equal protection of the laws as those similarly situated under South Carolina Constitution Article One Section 3 and the 14th Amendment to the United States Constitution and denied his state statutory rights under sections 17-27-20-17-27-100 whereas in the instant case the lower court reopen a pcr judgment to properly litigate subject matter jurisdictional claims that was attached to his original and amended application and the Respondent never made a

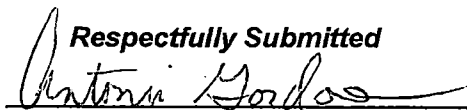
return and throughout the entire pcr hearing no legal argument presented on Gordon jurisdictional claims and the state prepared a proposed order that was signed by the pcr judge without first giving Appellant the opportunity to respond. The lower courts and our Supreme Court has found that ineffective assistance of pcr counsel is not a cognizable reason to have a second PCR, however, Gordon asserts this Court has the authority to correct these procedural errors and constitutional violations where the lower court reopen a part of claim 5 of the pcr order in which the anew judgment give Gordon the push he needed to demonstrate to the court that pcr counsel (1) Never assisted Appellant in amending his PCR application in which Gordon asserts his state procedural right to the effective assistant of pcr counsel under SCRCP Rule 71.1 was denied which has resulted in a miscarriage of justice that has been growing over the course of twenty years and counting. It's clear Appellant's first pcr on his only true meritorious claims represents pure garbage counsel did nothing. Counsel failed to even file a Rule 59(e) and Rule 60(b) scrpc motion at Gordon request. This represents clear abandonment. The lower court reopening of the pcr judgment indicates a Rule 59(e) and or a Rule 60(b) scrpc motion should have been filed.ROA pages volume one 365-368

Finally, Gordon has not read any case law where the court of general sessions reopen a pcr judgment for someone to properly litigate subject matter jurisdictional claims and within the subject matter jurisdictional claims there is a IAC claim. Therefore, it is requested that Gordon be permitted to file a second or successive post-conviction relief application to properly litigate claims of ineffective assistance of counsel Claims that of:

- (1) **COUNSEL FAILED TO OBJECT TO GENERAL SESSIONS COURT JURISDICTION**
- (2) **FAILING TO CONSTITUTIONALLY CHALLENGE THE CHILDREN CODE AS APPLIED TO GORDON BEING A PERSON LESS THAN SEVENTEEN YEARS OF AGE FOUND VIOLATING A CRIMINAL LAW AND TAKEN INTO FAMILY COURT JURISDICTION BASED ON PROBABLE CAUSE**

Conclusion of law

It is respectfully asked that this Honorable Court exercised its authority granted to it by the Constitution of our State and grant Appellant a second or successive PCR in the interest of justice to cure a miscarriage of justice.

Respectfully Submitted


Antonio Gordon#259798

Sept 19, 2022

THE STATE OF SOUTH CAROLINA
IN THE COURT of Appeals

APPEAL FROM YORK COUNTY
COURT OF GENERAL SESSIONS
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Appellant.

Proof of service

I, Antonio Gordon, hereby certify that he did serve Appellant's Petition for second or successive post conviction on the Respondent :

South Carolina Attorney General Office.

William M. Blich, Jr, Attorney General

P.O. Box 11549

Columbia, South Carolina 29221

By depositing in the mail with sufficient funds on this 19th day of Sept, 2022



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