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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM HORRY COUNTY
Court of Common Pleas

Honorable Kristi F. Curtis, Circuit Court Judge

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Appellate Case No. 2023-000027

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Derek Calhoun and Jacqueline Calhoun, ..... Appellants,

v.

State of South Carolina, by and through City of North Myrtle Beach, ..... Respondent.

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# INITIAL BRIEF OF RESPONDENT

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1. Should this appeal be dismissed on the grounds that an order denying a motion to change venue is not immediately appealable under S.C. Code Ann. § 14-3-330?

2. Does S.C. Code Ann. § 14-25-45, giving municipal courts the same "powers, duties and jurisdiction in criminal cases" as magistrates, authorize municipal courts to transfer cases out of their territorial jurisdiction based on a motion to change venue pursuant to S.C. Code Ann. § 22-3-920?

3. Were the affidavits submitted by the Calhouns sufficient to warrant a change of venue, even though they identified no specific facts suggesting improper bias by the municipal court?

## STATEMENT OF THE CASE

Respondent City of North Myrtle Beach adopts the Statement of the Case by Appellants Derek and Jacqueline Calhoun, except for the last sentence of the first paragraph.

## INTRODUCTION

This appeal arises out of misdemeanor citations issued to Appellants Derek and Jacqueline Calhoun ("the Calhouns") for violating an ordinance of Respondent City of North Myrtle Beach ("the City") prohibiting commercial activity on the City's public beaches. Prior to trial, the Calhouns moved for a change of venue pursuant to S.C. Code Ann. § 22-3-920, which provides in relevant part::

> Whenever in a case in the court of a magistrate … the prosecutor or accused in a criminal case shall file with the magistrate … an affidavit to the effect that he does not believe he can obtain a fair trial before the magistrate and setting forth the grounds of such belief, the papers shall be turned over to the nearest magistrate not disqualified from hearing the cause in the county[.]

The Calhouns contended that § 22-3-920 applies in municipal courts pursuant to S.C. Code Ann. § 14-25-45, which provides:

> Each municipal court shall have jurisdiction to try all cases arising under the ordinances of the municipality for which established. *The court shall also have all such powers, duties and jurisdiction in criminal cases … [as] conferred upon magistrates.*

(emphasis added). The Calhouns argued that by giving it the same "jurisdiction" as magistrates, § 14-25-45 necessarily empowered the municipal court to change the venue for their cases to "the nearest magistrate not disqualified from hearing the case," (R. p. __ (Affidavit of Derek Calhoun, at ¶ 9)), even though this would entail a transfer outside the territorial limits of the municipal court's jurisdiction.

The municipal court, and the circuit court on appeal, rejected the Calhouns' argument, holding that § 22-3-920 does not apply to municipal courts. (R. p. ___ (Mun. Ct. Order); R. p. __ (Cir. Ct. Order of Dec. 11, 2022); R. p. __ (Corrected Cir. Ct. Order of

Dec. 29, 2022).) The circuit court also held that the Calhouns' affidavits were insufficient to make a change of venue mandatory under § 22-3-920.

As explained in Part II, this Court should dismiss this appeal because the denial of a motion for a change of venue does not affect a substantial right and therefore is not immediately appealable. *See* S.C. Code Ann. § 14-3-330(2)(c). Alternatively, the Court should affirm the ruling of the circuit court because (1) as demonstrated in Part III, § 22-3-920 does not apply to municipal courts; and (2) regardless, for the reasons set forth in Part IV, the Calhouns' affidavits failed to adequately "set[] forth the grounds of [their] belief" that they could not receive a fair trial from the municipal court.

## ARGUMENT

### I. Standard of Review

"In criminal cases, this Court sits to review errors of law only and is bound by factual findings of the trial court unless an abuse of discretion is shown." *State v. Laney*, 367 S.C. 639, 643, 627 S.E.2d 726, 729 (2006). An abuse of discretion occurs when the court's decision is unsupported by the evidence or controlled by an error of law. *See State v. Black*, 400 S.C. 10, 16, 732 S.E.2d 880, 884 (2012).

### II. The Appeal Should Be Dismissed Because an Order Denying a Change of Venue Is Not Immediately Appealable

This Court's appellate jurisdiction is controlled by S.C. Code Ann. § 14-3-330, which provides that "[o]nly final judgments and certain interlocutory orders are appealable." *Burkey v. Noce*, 398 S.C. 35, 37, 726 S.E.2d 229, 230 (Ct. App. 2012). An interlocutory order is appealable under § 14-3-330 only if it involves the merits of the case or affects a substantial right. *See id.* Section 14-3-330's strictures on appellate jurisdiction apply in criminal cases (like this one) as well as in civil cases. *See State v. Wilson*, 387 S.C. 597, 600, 693 S.E.2d 923, 924–25 (2010) (analyzing appealability under § 14-3-330 in a criminal case).

The South Carolina Supreme Court has squarely held that § 14-3-330 does not permit an immediate appeal of an order denying a change of venue. *See Breland v. Love Chevrolet Olds, Inc.*, 339 S.C. 89, 92, 529 S.E.2d 11, 12–13 (2000). In *Breland*, the defendant in a wrongful death action moved for a change of venue on the grounds that it was not a resident of Hampton County, where the case was pending. The circuit court denied

the motion and the defendant appealed, arguing that the order was immediately appealable under § 14-3-330(C) because "the trial court's order affected [its] substantial right to venue in the county of [its] residence and the refusal to transfer venue effectively struck out a portion of [its] answer." *Id.* at 92, 529 S.E.2d at 12; *see* S.C. Code Ann. § 14-3-330(2)(c) (proving that a party may appeal "[a]n order affecting a substantial right made in an action when such order … (c) strikes out an answer or any part thereof or any pleading in any action").

The Supreme Court rejected this argument, holding that "[t]he trial court's order [denying a change of venue] did not 'affect' the Defendant's right to venue in the county of its residence because any error in the order can be corrected on appeal following the trial." *Breland*, 339 S.C. at 93, 529 S.E.2d at 13. An order affects a substantial right, and is immediately appealable under § 14-3-330(2)(c), "in situations where the substantial right could not be vindicated on appeal after the case," such as an order affecting the mode of trial. *Id.*

Emphasizing the strong policy against piecemeal appeals, the Court concluded that "requiring a defendant to wait until after trial to appeal the issue of proper venue is the most appropriate course to take where any error in that decision will not prejudice the defendant anymore [sic] than other interlocutory orders which, if in error, would require a new trial" *Id.* at 94, 529 S.E.2d at 14. Thus, "[e]ven though proper venue is a substantial right … avoidance of a trial is not a sufficient reason to justify immediate appellate review." *Id.*

*Breland* is controlling, and it establishes that this Court lacks jurisdiction over this appeal. Accordingly, the appeal should be dismissed.

## III. S.C. Code Ann. § 22-3-920 Does Not Apply to Municipal Courts

Whether § 22-3-920 applies to municipal courts is a question of statutory construction. "The cardinal rule of statutory construction is to ascertain and effectuate the intent of the legislature," and "the text of a statute is considered the best evidence of the legislative intent or will." *Hodges v. Rainey*, 341 S.C. 79, 85, 533 S.E.2d 578, 581 (2000) (internal quotation marks omitted). Where a statute's language is plain and unambiguous, the Court has no right to impose another meaning. *Id.* "Statutes in apparent conflict should, if reasonably possible, be construed to allow both to stand and to give effect to each." *I'On v. Town of Mt. Pleasant*, 338 S.C. 406, 412, 526 S.E.2d 716, 719 (2000). Moreover, "[h]owever plain the ordinary meaning of the words used in a statute may be, the courts will reject that meaning when to accept it would lead to a result so plainly absurd that it could not possibly have been intended by the Legislature or would defeat the plain legislative intention." *Kiriakides v. United Artists Commc'ns, Inc.*, 312 S.C. 271, 275, 440 S.E.2d 364, 366 (1994).

The Calhouns contend that "§ 22-3-920 applies to municipal courts and judges the same as it does to magistrates" because § 14-25-45 confers on municipal courts the same "powers, duties, and jurisdiction in criminal cases" as those "conferred on magistrates." (Appellants' Br. at 7 (quoting S.C. Code Ann. § 14-25-45).) The Calhouns reason that just as § 22-3-920 authorizes a magistrate to transfer a criminal case to a

magistrate within the same county, by virtue of § 14-25-45 a municipal court has the same "jurisdiction" and therefore must likewise be authorized to transfer a criminal case to a magistrate within the same county. To support their argument, the Calhouns cite cases and Attorney General Opinions for the general proposition that pursuant to § 14-25-45, a municipal court's "jurisdiction" is the same as that of a magistrate. (Appellants' Br. at 8-10.)

The Calhouns' argument fails because it conflates territorial jurisdiction and subject matter jurisdiction, which are "separate and distinct concepts." *State v. Boswell*, 391 S.C. 592, 599, 707 S.E.2d 265, 268 (2011). As the Supreme Court explained in *Boswell*, "subject matter jurisdiction is the authority granted through the constitution or statute to adjudicate a class of cases or controversies," while "territorial jurisdiction is the authority over persons, things or occurrences located in a defined geographical area." *Id.* (citing *Smith v. Commonwealth*, 56 Va. App. 351, 693 S.E.2d 765, 769 (2010)). "[T]erritorial jurisdiction is not a component of subject matter jurisdiction." *State v. Dudley*, 364 S.C. 578, 582, 614 S.E.2d 623, 625 (2005).

This distinction is fatal to the Calhouns' appeal. Their argument is that the "jurisdiction" conferred by § 14-25-45 enables a municipal court to transfer a criminal case to a magistrate in the same county under § 22-3-920. This can only be correct if § 14-25-45 refers to *territorial*, rather than *subject matter* jurisdiction. Otherwise, a municipal court would have no authority to transfer a case to any court outside the municipality. *See, e.g.*, 1980 S.C. Op. Att'y Gen., 1980 WL 120972, at *1 (S.C.A.G. Nov. 18, 1980) ("Generally, the corporate limits of a municipality are considered as the limits of

the territorial jurisdiction of municipal courts.").

However, settled law establishes that the reference to "jurisdiction" in § 14-25-45 is to *subject matter*, not *territorial*, jurisdiction. *See City of Camden v. Brassell*, 326 S.C. 556, 562–63, 486 S.E.2d 492, 496 (Ct. App. 1997) (citing § 14–25–45 for the proposition that "magistrate and municipal courts would have *subject matter* jurisdiction over a first offense driving under the influence charge if committed by an adult" (emphasis added)); *City of Pickens v. Schmitz*, 297 S.C. 253, 256, 376 S.E.2d 271, 272 (1989) (holding municipal courts have "uniform jurisdiction," as required by S.C. Const. art. V, § 1, because all municipal courts in South Carolina have the same *subject matter* jurisdiction); *see also* 1987 S.C. Op. Att'y Gen. 219, 1987 WL 245491, at *1 (1987) ("Pursuant to Section 14–25–45 of the Code, municipal judges have the same *subject matter* jurisdiction" as magistrates. (emphasis added)).

None of the cases and Attorney General opinions on which the Calhouns rely suggests, contrary to the authority cited above, that § 14-25-45 concerns territorial, rather than subject matter, jurisdiction. In fact, at least two Attorney General Opinions have reached the opposite conclusion, opining that a municipal court *cannot* transfer a case to a magistrate. For example, in a 1979 opinion concerning the predecessor to § 22-3-920, the Attorney General's Office opined that "a change of venue from municipal court to a magistrate's court is not authorized." 1979 S.C. Op. Att'y Gen., 1979 WL 43050, at *1 (S.C.A.G. June 6, 1979). That opinion relied on an earlier Attorney General Opinion stating, "Section 43-131 [now codified as § 22-3-920], providing for change of venue in certain cases, has to do with magistrates' courts only … there is no provision

of law requiring or permitting the transfer of a criminal case from a town court to a magistrate." 1972 S.C. Op. Att'y Gen., 1972 WL 26003, at *1 (S.C.A.G. Oct. 6, 1972).

The municipal court in this case cogently explained why § 22-3-920 does not apply to municipal courts:

> First, the statute in question, and the entire Title 22, deal specifically with Magistrates Courts and/or Constables. Municipal Courts are not directly referenced within the statute or this title. Second, while a change of venue between Magistrate Courts may be logistically seamless in nature, such a change of venue from Municipal Court is decidedly not. Municipal Courts are courts within a particular political subdivision and not part of the unified Magistrate Court system which operates and has jurisdiction throughout the county (a different political subdivision) in which it is situate. While both Municipal and Magistrate Courts are Summary Courts and have many similarities, they are not within the same political subdivision and the geographical limits of their jurisdiction is vastly different.

(R. p. __ (Mun. Ct. Order, at 1).)

For the foregoing reasons, this Court should hold that § 22-3-920 does not apply to municipal courts.

## IV. The Calhouns Failed to Show Entitlement to a Change of Venue

The circuit ruled in the alternative that even if S.C. Code Ann. § 22-3-920 applied to municipal courts, the affidavits submitted by the Calhouns were insufficient to make a change of venue mandatory under the statute. (R. p. __ (Order of Dec. 11, 2022).) The Calhouns challenge this ruling, arguing that the sufficiency of the affidavits was not before the circuit court and that, regardless, their affidavits were sufficient to make a change of venue mandatory under § 22-3-920.

### A. The Circuit Court Properly Considered the Sufficiency of the Affidavits

The Calhouns first argue that the circuit court lacked authority to rule on the sufficiency of their affidavits. They concede that "[t]he appellate court may affirm any ruling, order, decision or judgment upon any ground(s) appearing in" the record. Rule 220(c), SCACR. They contend, however, that "[t]he [municipal] court simply found that [§ ]22-3-920 did not apply to municipal courts and that finding was appealed to the [circuit] court, nothing about the sufficiency of the affidavits was part of the record on appeal before the [circuit] court." (Appellants' Br. at 11.) This argument is factually and legally incorrect.

First, as a factual matter, the sufficiency of the Calhouns' affidavits was unquestionably raised *by the Calhouns* in both the municipal court and the circuit court. The municipal court's order denying a change of venue noted the Calhouns' contention that their affidavits were sufficient to satisfy the requirements of § 22-3-920. (R. p. __ (Mun. Ct. Order, at 1); R. p. __ (12/1/2022 Hrg. Tr. at 6:8-9 (stating that the affidavits were submitted to the municipal court)).) At the circuit court level, the Calhouns submitted their affidavits as exhibits and presented argument regarding their sufficiency at the hearing conducted on December 1, 2022. (R. pp. __ (affidavits); R. pp. __ (12/1/2022 Hrg. Tr. at 8:15-24).) Moreover, the Calhouns contend in their brief that the municipal court "implicitly found that the affidavits were sufficient." (Appellants' Br. at 11.) Thus, the sufficiency of the affidavits was plainly before the municipal court and the circuit court.

The Calhouns are also wrong on the law. Their position appears to be that because the municipal court did not *explicitly* rule on the sufficiency of the affidavits, that issue cannot be part of the record on appeal to the circuit court. The Supreme Court has clearly held, however, that:

> a respondent—the "winner" in the lower court—may raise on appeal any additional reasons the appellate court should affirm the lower court's ruling, *regardless of whether those reasons have been presented to or ruled on by the lower court.* It would be inefficient and pointless to require a respondent to return to the judge and ask for a ruling on other arguments to preserve them for appellate review.

*I'On*, 338 S.C. at 419, 526 S.E.2d at 723 (emphasis added). Because the Calhouns' affidavits were presented to the municipal court and the circuit court, their insufficiency provides a ground for affirmance under Rule 220(c) even though the municipal court did not rule on their sufficiency.

### B. The Circuit Court Correctly Found the Affidavits Insufficient

To be entitled to a change of venue, a criminal defendant must submit "an affidavit to the effect that he does not believe he can obtain a fair trial before the magistrate *and setting forth the grounds for such belief*." S.C. Code Ann. § 22-3-920 (emphasis added). The affidavit must identify a "ground or fact showing that a fair trial could not be had before the magistrate," *Witte v. Cave*, 73 S.C. 15, 52 S.E. 736, 737 (1905), *i.e.*, that there is "good cause for change of venue," *Cromer v. Watson*, 59 S.C. 488, 38 S.E. 126, 128 (1901), although it need not provide a degree of proof that would "*convince* the magistrate." *Bacot v. Deas*, 67 S.C. 245, 45 S.E. 171, 172 (1903) (emphasis added). It is sufficient if the statements in the affidavit are sufficiently concrete and particular "as

would form the basis of an indictment for perjury" if they were false. *Id.*[1]

Two cases illustrate the difference between a sufficient affidavit and an insufficient one. First, in *Startex v. Comer*, 184 S.C. 126, 191 S.E. 903 (1937), the affidavit claimed that the magistrate judge's prejudice against the defendant "was so deep that in order to defeat the [defendant's] rights he will" deliberately misstate the evidence, as he had done in similar cases against other defendants. *Id.* at 904. The Supreme Court found this was not sufficient because "the facts as to the charges sought to be made against the magistrate with regard to his reports of certain other cases … are not stated with sufficient definiteness and fullness to warrant a reasonable inference that, if true as stated, such charges would be well-founded." *Id.* at 905.

In contrast, the Supreme Court held the affidavit in *Browning Mfg. Co. v. Brunson*, 187 S.C. 278, 197 S.E. 311 (1938), was sufficient to entitle the defendant to a change of venue. In that case, the defendant alleged:

> [I]ll-feeling has for some time existed and continues between this deponent and Magistrate William M. Reynolds, originating in angry words that passed between this deponent's father and former business associate, the late W. E. Brunson, deceased, and the

[1] *Accord* 1975 S.C. Op. Att'y Gen., 1975 WL 28901, at *1 (S.C.A.G. June 6, 1975) ("[I]n determining the sufficiency of the required affidavit, more than a mere opinion must be set forth. The affidavit must set forth substantial grounds for a belief that the party cannot obtain a fair trial."); 1967 S.C. Op. Att'y Gen., 1967 WL 12012, at *1 (S.C.A.G. Sept. 29, 1967) ("The affidavit must state reasons why a fair trial cannot be had before you and it should state facts, not opinions."); 1964 S.C. Op. Att'y Gen. 222, 1964 WL 8353, at *2 (1964) ("It is the opinion of this Office … that … [a] magistrate must grant change of venue if the required affidavit … sets out sufficient facts to justify the belief that a fair trial cannot be obtained before the magistrate who issued the warrant. Opinions or beliefs of the person making the affidavit are not enough to make it mandatory that venue be changed.").

> said William M. Reynolds, growing out of dissatisfaction on the part of the Brunsons with reference to the manner in which the said William M. Reynolds, a practicing attorney, had handled certain legal matters about which the Brunsons had consulted him, and which they, therefore, withdrew from his hand.

*Id.*, 197 S.E. at 312. Thus, in *Brunson*, the Supreme Court found that an affidavit was sufficient where it stated specific facts plausibly explaining why the magistrate judge might well be biased against the defendant. *Accord* 1966 S.C. Op. Atty. Gen. 159, 1966 WL 8532, at *2 (S.C.A.G. 1966) (opining that a defendants "should be granted a change of venue" under the predecessor to § 22-3-920 when the presiding magistrate was also the arresting officer, because such a person would necessarily "have a pre-existing opinion" regarding the defendant's guilt).

Here, Derek and Jacqueline Calhoun each submitted two, identical affidavits in support of their motions to change venue. The relevant portions of the affidavits state:

> 5. My motion is based upon my belief that a fair and impartial trial cannot be had in the North Myrtle Beach Municipal Court, where both the presiding judge and the prosecutor assigned to my case are employed by the City of North Myrtle Beach.
>
> 6. I am informed and believe that the City Attorney and the Mayor of the City of North Myrtle Beach have taken a personal interest in the outcome of my case, as has been indicated to me in direct conversations between us and also my conversations with others.
>
> 7. I am informed and believe, based upon my direct conversations with Public Safety officers of North Myrtle Beach and with the City Attorney for North Myrtle Beach that the City Attorney was directly involved in the decision to issue me a citation and was personally involved in giving either direct or relayed orders to North Myrtle Beach Public Safety personnel because stopping my company and I were a "top priority for the city."

(*E.g.*, R. p. __ (Affidavit of Derek Calhoun in Criminal Action No. 18514EF); *see also* R.

pp. ___ (Affidavits of Derek and Jacqueline Calhoun in Criminal Action Nos. 20221850166173 and 20221850166174).) When these statements are considered in light of *Startex* and *Brunson*, they are clearly insufficient to mandate a change of venue under § 22-3-920.

Only Paragraph 5 of the affidavit touches on the core issue of whether the Calhouns can receive a fair trial from the municipal court. *See Witte*, 52 S.E. at 737 (to make a change of venue mandatory, an affidavit must identify a "ground or fact showing that a fair trial could not be had" in the presiding court). Paragraph 5 merely expresses the Calhouns' "belief" that they cannot receive a fair trial because the municipal court judge is employed by the City. (R. p. __.) This statement is even less specific than the affidavit held insufficient in *Bacot*—a case on which the Calhouns rely—which asserted that the magistrate was biased "on account of certain matters which have come up in the past between them." *Bacot*, 45 S.E. at 172; *see id.* (holding that "the defendant could not be convicted of perjury" based on this statement because it was "nothing more than an expression of the defendant's opinion").

Tacitly conceding the inadequacy of Paragraph 5, the Calhouns urge this Court to focus on Paragraphs 6 and 7, which allege that "the City Attorney and the Mayor … have taken a personal interest in the outcome of my case" and that "the City Attorney was directly involved in the decision to issue me a citation … because stopping my company and I were a 'top priority for the city.'" (R. p. __.) These statements do not come close to the specificity in the affidavit approved by the Supreme Court in *Brunson*, which set forth a particular event—the defendant's father firing the magistrate due to a

business dispute when he was an attorney in private practice—that could reasonably be expected to give rise to bias by the municipal court.

More important than the lack of specific is that Paragraphs 6 and 7 are entirely irrelevant to the question of whether the Calhouns can receive a fair trial from *the municipal court*. Because Contrary to the Calhouns' argument (Appellants' Br. at 11-12), the statements in Paragraphs 6 and 7 could not provide the basis for a perjury prosecution because they are not material to the question of whether the Calhouns can receive a fair trial from the municipal court. *See Simpson v. Moore*, 367 S.C. 587, 601, 627 S.E.2d 701, 708 (2006) (holding that "use of perjured testimony is subject to the materiality standard of review," meaning that there is a reasonable probability of a different result had the truth been disclosed), *abrogated on other grounds*, *Smalls v. State*, 422 S.C. 174, 810 S.E.2d 836 (2018); *see also State v. Bailey*, 279 S.C. 437, 439–40, 308 S.E.2d 795, 797 (1983) (holding that an attempt to procure perjured testimony could be disregarded because the testimony was not material to guilt or innocence).

Because the Calhouns' affidavits fail to state specific reasons why they could not receive a fair trial from the municipal court, the circuit court correctly ruled that they were insufficient to make a change of venue mandatory under § 22-3-920.

## CONCLUSION

For the reasons set forth herein, this appeal should be dismissed because the denial of a motion for a change of venue is not immediately appealable under S.C. Code Ann. § 14-3-330. Alternatively this Court should affirm because S.C. Code Ann. § 22-3-920 does not apply to municipal courts, and because the Calhouns' affidavits fail to

state concrete and particularized facts supporting their belief that they cannot receive a fair trial from the municipal court.

Respectfully submitted,

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