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SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Horry County

Honorable H. Steven DeBerry IV, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

SEBASTIAN D. KAISK,

APPELLANT.

APPELLATE CASE NO. 2022-000181

FINAL BRIEF OF APPELLANT

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3.

Did the trial court err by sentencing Appellant to a consecutive term of five years imprisonment for possession of a weapon during the commission of a violent crime where the court erroneously found the sentence had to be served consecutively to the sentence imposed for the violent crime since pursuant to S.C. Code Ann. § 16-23-490(B) the court had discretion to order the five year sentence be served consecutively or concurrently?

STATEMENT OF THE CASE

A Horry County Grand Jury indicted Appellant on September 11, 2019 for murder and possession of a weapon during the commission of a violent crime. R. 236-239. His case was called to trial on February 7, 2022 before the Honorable H. Steven DeBerry, and a jury. R. 1. Assistant Solicitors Seth Oskin and Rachel Harte represented the state. R. 1. Barbara Pratt represented Appellant. R. 1.

On February 9, 2022, the jury found Appellant guilty as indicted. R. 225, ll. 11-25. He was sentenced to forty-three years for murder and five years consecutive for the weapons offense. R. 231, l. 25 – 232, l. 11. The aggregate sentence imposed was forty-eight years imprisonment.

This appeal follows.

ARGUMENT

1.

The trial court erred by refusing to charge the jury on self-defense when there was evidence presented to support the existence of all four elements of the defense.

Relevant Facts

On the night of July 14, 2019, Appellant, who was eighteen, encountered the decedent, Tyler Schaefer, at BI-LO in North Myrtle Beach. State's Exhibit No. 38 (Recorded Statement of Defendant). The two had been friends for at least a year and had previously lived together. State's Exhibit No. 38 (Recorded Statement of Defendant). Appellant denied going to BI-LO that night to look for the decedent. He "just ran into him." State's Exhibit No. 38 (Recorded Statement of Defendant). After meeting, Appellant and the decedent began walking together toward the trailer where the decedent lived with his grandmother. State's Exhibit No. 38 (Recorded Statement of Defendant).

As they walked, they were captured by surveillance cameras located outside several nearby businesses. Appellant questioned the decedent about some money the decedent owed him. State's Exhibit No. 38 (Recorded Statement of Defendant). The decedent had previously taken two hundred dollars from Appellant's backpack. State's Exhibit No. 38 (Recorded Statement of Defendant); State's Exhibit No. 39 (Recorded Statement of Defendant). It "wasn't nothing [Appellant] was really worried about" and when the decedent told Appellant he did not have the money at that time, Appellant told him "that's fine." State's Exhibit No. 38 (Recorded Statement of Defendant).

The two stopped at the corner of 38th Avenue South and Smith Street where they remained talking for ten to fifteen minutes. Eventually, the decedent "came at" Appellant, threw

Appellant on the ground, and got on top of him. State's Exhibit No. 38 (Recorded Statement of Defendant). Once Appellant was able to get the decedent off of him, Appellant shot him. State's Exhibit No. 38 (Recorded Statement of Defendant). Appellant admitted he squeezed the trigger twice. State's Exhibit No. 38 (Recorded Statement of Defendant). Immediately after he shot the decedent, Appellant took off running. He returned seconds later to grab his shirt that he had left on the ground. State's Exhibit No. 38 (Recorded Statement of Defendant). Appellant did not call 911 because he was scared. State's Exhibit No. 39 (Recorded Statement of Defendant).

The altercation and shooting were captured by security cameras installed outside Samu Spa, a local business. This surveillance footage, which did not include audio, was admitted as State's Exhibit No. 14.

The following day, Appellant was detained after he was spotted walking along Highway 17 and matched the description of the suspect caught on surveillance footage. R. 85, l. 8 – 87, l. 11. Appellant admitted his involvement in the shooting and openly spoke to law enforcement. See State's Exhibit No. 38 (Recorded Statement of Defendant) and State's Exhibit No. 39 (Recorded Statement of Defendant). After Appellant was arrested, law enforcement searched his phone and discovered a Snapchat video. The video, which was taken by Appellant, showed the decedent sitting on the ground before the altercation. The decedent, who was crying, asked if he could call his children. State's Exhibit No. 13 (Snapchat Video). Appellant told the decedent to say whatever he wanted for heaven or hell, "whichever one you go to." State's Exhibit No. 13 (Snapchat Video). Defense counsel argued during closing that Appellant recorded this video to show he had the ability to scare the decedent. R. 201, l. 21 – 202, l. 18.

The trial court charged the jury on the lesser included offense of voluntary manslaughter, but refused to charge self-defense.

Request to Charge

During the charge conference, defense counsel requested the trial court charge the jury on self-defense. R. 178, ll. 17-20. She argued Appellant raised the defense during his statement to law enforcement. R. 181, ll. 8-12.

Relying on State v. Williams, 427 S.C. 246, 830 S.E.2d 904 (2019), the assistant solicitor argued the court should not charge self-defense because there was no evidence Appellant was without fault in bringing on the difficulty, the first element of self-defense. R. 178, l. 22 – 179, l. 24. She asserted, "The State would allege this defendant showed up with an unlawful carrying of a pistol to an illegal drug transaction, although they weren't exchanging drugs, it was over drug money . . . If Your Honor doesn't believe it was a drug transaction, this victim was, essentially kidnapped and led to the side street. He [the decedent] was held against his will. He [Appellant] was bringing about the difficulty himself." R. 179, ll. 3-11. She later continued, "He [Appellant] knew when he was going to speak to that victim, that they had an issue, whether it be about $200 or weed or both of that. He knew there was a difficulty between them. He brought a gun, led him to a side street, held him against his will. He cannot satisfy that first element." R. 179, ll. 17-22.

Defense counsel refuted the solicitor's account of the evidence. Referencing the surveillance video evidence, counsel stated Appellant was walking "peacefully" alongside the decedent after they encountered each other at BI-LO. Appellant was not holding onto the decedent's shirt nor did Appellant "have a gun to his [the decedent's] head." R. 180, ll. 6-11. Additionally, on the surveillance footage showing the alleyway between the spa and Access Medical, Appellant and the decedent are seen "walking side by side." R. 180, ll. 12-14. The pair eventually stopped on a street corner about three houses down from the decedent's home where

they talked for ten to fifteen minutes before the struggle began. Counsel argued the evidence showed the decedent could have left at anytime and was not "kidnapped" as alleged by the state. R. 180, ll. 14-18. Moreover, counsel asserted "that meeting with someone and asking for the money they owe you" is not bringing on the difficulty. R. 180, ll. 19-22. As to the gun, counsel emphasized that Appellant said during his statement "that he had it for his protection." She argued Appellant was permitted to arm himself in self-defense even if he was in unlawful possession of the gun. R. 181, ll. 1-6.

In reply, the assistant solicitor maintained this case is similar to the facts in State v. Slater, 373 S.C. 66, 644 S.E.2d 50 (2007) in that Appellant armed himself before engaging in a situation he "knew . . . was going to escalate." R. 183, l. 11 – 184, l. 11.

Citing Williams, the court stated, "If there is no evidence to support the existence of any one element, then the trial court must not charge self-defense to the jury and that is a question of law for the . . . trial court." R. 184, l. 21 – 185, l. 4; See Williams, 427 S.C. at 249, 830 S.E.2d at 906. The court determined, after reviewing the evidence, that there was no "question that but for the defendant's actions, they [Appellant and the decedent] would not have been where they were but for him [Appellant] bringing a gun to the situation." R. 185, ll. 13-16. Emphasizing the Snapchat video, admitted as State's Exhibit No. 13, the court concluded the evidence indicated Appellant was "not without fault in bringing on the difficulty" and thus, "the case law requires that we not charge self-defense." R. 185, ll. 17-20.

While acknowledging that the rules do not permit her to further argue, defense counsel took exception to the court's ruling. R. 185, ll. 23-25.

The assistant solicitor asked for clarification from the trial court regarding whether defense counsel could still assert during her closing argument that Appellant acted in self-

defense. R. 186, ll. 2-7. Defense counsel maintained that she could because Appellant raised the defense during his recorded confession and counsel is permitted to argue any facts in evidence. R. 186, ll. 9-14. The court agreed stating, "*It could be reasonably inferred from the evidence in the record.*" R. 186, ll. 15-16 (emphasis added).

Standard of Review

"If there is any evidence in the record from which it could reasonably be inferred that the defendant acted in self-defense, the defendant is entitled to instructions on the defense, and the trial [court's] refusal to do so is reversible error." State v. Day, 341 S.C. 410, 416-417, 535 S.E.2d 431, 434 (2000) (quoting State v. Muller, 282 S.C. 10, 316 S.E.2d 409 (1984)). "If there is no evidence to support the existence of any one element [of the defense], the trial court must not charge self-defense to the jury. Whether there is any evidence to support each element is a question of law." State v. Williams, 427 S.C. 246, 249, 830 S.E.2d 904, 906 (2019).

"The law to be charged to the jury is determined by the evidence presented at trial." State v. Brown, 362 S.C. 258, 261-262, 607 S.E.2d 93, 95 (Ct. App. 2004) (quoting State v. Hill, 315 S.C. 260, 262, 433 S.E.2d 848, 849 (1993)) (internal quotation marks omitted). "A request to charge a correct statement of the law on an issue raised by the indictment and the evidence presented at trial should not be refused." State v. Brandt, 393 S.C. 526, 549, 713 S.E.2d 591, 603 (2011) (quoting State v. Austin, 299 S.C. 456, 458, 385 S.E.2d 830, 831 (1989)) (emphasis added). "If there is any evidence to support a jury charge, the trial [court] should grant the request." Brown, 362 S.C at 262, 607 S.E.2d at 95 (citing State v. Shuler, 344 S.C. 604, 632, 545 S.E.2d 805, 819 (2001)) (emphasis added). Additionally, "[w]hen reviewing the [trial] court's refusal to deliver a requested jury instruction, appellate courts must consider the evidence in a light most favorable to the defendant." State v. Williams, 400 S.C. 308, 314, 733 S.E.2d

605, 608-609 (Ct. App. 2012) (citing State v. Cole, 338 S.C. 97, 101, 525 S.E.2d 511, 512-513 (2000)).

Discussion

The trial court erred by refusing to charge the jury on self-defense when there was evidence to support the charge. "To establish self defense in South Carolina, four elements must be present: (1) the defendant must be without fault in bringing on the difficulty; (2) the defendant must have been in actual imminent danger of losing his life or sustaining serious bodily injury, or he must have actually believed he was in imminent danger of losing his life or sustaining serious bodily injury; (3) if his defense is based upon his belief of imminent danger, the defendant must show that a reasonably prudent person of ordinary firmness and courage would have entertained the belief that he was actually in imminent danger and that the circumstances were such as would warrant a person of ordinary prudence, firmness, and courage to strike the fatal blow in order to save himself from serious bodily harm or the loss of his life; and (4) the defendant had no other probable means of avoiding the danger." State v. Day, 341 S.C. 410, 416, 535 S.E.2d 431, 434 (2000) (citing State v. Bryant, 336 S.C. 340, 520 S.E.2d 319 (1999)).

During Appellant's recorded statement to law enforcement, which was admitted into evidence as State's Exhibit No. 38 and State's Exhibit No. 39, Appellant stated that he randomly encountered the decedent at Bi-LO and asked the decedent about the two hundred dollars the decedent owed him. As Appellant and the decedent were talking, the decedent grabbed Appellant, threw him to the ground, and got on top of him. During the struggle, Appellant pulled out his gun and shot the decedent twice in self-defense. See State's Exhibit No. 38 (Recorded Statement of Defendant). Appellant's account of events satisfies all four elements of self-defense.

First, Appellant was not at fault in bringing on the difficulty. Unlike the state argued at trial, there was no evidence Appellant was looking for the decedent that night. When directly asked during his interview with law enforcement whether he sought out the decedent, Appellant said he did not. He "just ran into him." State's Exhibit No. 38 (Recorded Statement of Defendant). As the friends were walking and talking, Appellant asked the decedent about the two hundred dollars the decedent owed him. Appellant explained during his statement that the debt "wasn't nothing [he] was really worried about" and when the decedent told Appellant he did not have the money at the time, Appellant told him "that's fine." State's Exhibit No. 38 (Recorded Statement of Defendant).

At trial, citing to State v. Williams, 427 S.C. 246, 830 S.E.2d 904 (2019), the state argued Appellant was at fault in bringing on the difficulty because he brought a gun to a drug transaction. However, there was no evidence presented at trial that Appellant and the decedent were engaged in a drug transaction. Appellant told investigators that the decedent owed him two hundred dollars and that he asked the decedent about the debt before the shooting. As defense counsel argued below, merely asking someone about money they owe you does not constitute bringing on the difficulty. Additionally, the decedent told the first officer who arrived on scene that he owed someone money corroborating Appellant's statement to the police. Consequently, the facts of this case differ significantly from Williams, where the defendant admitted he was engaged in an illegal drug transaction at the time he shot the decedent.

Moreover, while Appellant was in unlawful possession of a gun, our Supreme Court has held that a defendant may lawfully arm himself in self-defense even when in unlawful possession of a firearm. See State v. Burriss, 334 S.C. 256, 513 S.E.2d 104 (1999). Like the defendant in Burriss, Appellant was not doing anything "in violation of the law" except unlawfully possessing

a firearm. Appellant merely ran into the decedent at BI-LO and, as the two were walking and talking, discussed the money the decedent owed Appellant. Appellant told investigators that he was not concerned when the decedent indicated he could not repay Appellant that night. However, for whatever reason during their discussion, the decedent came at Appellant, threw Appellant to the ground, and got on top of him. It was only then that Appellant shot the decedent to protect himself. Consequently, in the light most favorable to Appellant, there was evidence presented to support the first element of self-defense.

As to the second and third elements of self-defense, there was evidence presented that Appellant was in imminent danger of losing his life or sustaining serious bodily injury and that Appellant actually believed he was in such danger. The decedent threw Appellant to the ground and was on top of Appellant. The two continued to "tussle." It was during this "tussle" that Appellant shot the decedent. Like Appellant, "a reasonably prudent person of ordinary firmness and courage" would have likewise believed he actually was in imminent danger and that the circumstances warranted him to use deadly force to save himself from serious bodily harm or death. Accordingly, there was evidence presented, again in the light most favorable to Appellant, to support the second and third elements.

Lastly, there was evidence Appellant had no other probable means of avoiding the danger. The decedent threw Appellant to the ground and was on top of Appellant. As the two were "tussling," Appellant shot the decedent twice in rapid succession. Given the circumstances, Appellant had no other way to avoid the danger of losing his life or sustaining serious bodily injury but to use deadly force.

Because there was evidence in the light most favorable to Appellant to support all four elements of self-defense, the trial court erred by refusing to charge the jury on self-defense.

Respectfully, this Court should reverse Appellant's conviction and sentence and remand for a new trial.

2.

The trial court erred by refusing to redact Appellant's comment on a Snapchat video, which was admitted into evidence as State's Exhibit No. 13, that he was "reporting to one of my G's . . . my official G's" pursuant to Rule 403, SCRE, since the remark was a reference to gangs and any probative value of the evidence was substantially outweighed by the danger of unfair prejudice.

Relevant Facts

After Appellant was arrested, law enforcement searched his phone and discovered a Snapchat video. The video, which was taken by Appellant, showed the decedent sitting on the ground before the altercation. State's Exhibit No. 13 (Snapchat Video). The decedent, who was crying, asked if he could call his children. State's Exhibit No. 13 (Snapchat Video). Appellant told the decedent to say whatever he wanted for heaven or hell, "whichever one you go to." State's Exhibit No. 13 (Snapchat Video). When the decedent asked Appellant what he was doing, Appellant responded, "Oh, nothing. Nothing. Just reporting to one of my G's. That's all. My official G's let me put it like that." State's Exhibit No. 13 (Snapchat Video).

Defense counsel moved to redact Appellant's comment on the video that he was "reporting to one of my G's . . . my official G's" pursuant to Rule 403, SCRE, and State v. Liverman, 386 S.C. 223, 687 S.E.2d 70 (Ct. App. 2009). She argued the remark was a "reference to gangs" and was "clearly more prejudicial than probative. R. 91, ll. 16-22. Counsel asserted that the jurors would know the comment was a "gang reference." "The jury knows what a 'G' is and an 'OG' is," particularly given the television show called the "Last OG." R. 92, ll. 10-14.

The assistant solicitor argued the comment was probative to show malice and "could go to motive on why he [Appellant] killed him." R. 92, ll. 15-23.

The trial court ruled the comment was admissible because it was a statement by Appellant just before the "alleged commission of a crime." R. 94, l. 24 – 95, l. 9. It found this case was distinguishable from Liverman in that Liverman involved multiple expert witnesses testifying about what certain body tattoos may mean. R. 94, l. 24 – 95, l. 9.

Standard of Review

"The admission or exclusion of evidence is an action within the sound discretion of the [trial] court and will not be disturbed on appeal absent an abuse of discretion." State v. Tapp, 398 S.C. 376, 385, 728 S.E.2d 468, 473 (2012) (citing State v. Williams, 386 S.C. 503, 509, 690 S.E.2d 62, 65 (2010)). "An abuse of discretion occurs when the conclusions of the [trial] court are either controlled by an error of law or are based on unsupported factual conclusions." Id. (citing State v. Douglas, 369 S.C. 424, 429-30, 632 S.E.2d 845, 848 (2006)).

Discussion

The trial court erred by refusing to redact Appellant's comment on the Snapchat video, which was admitted into evidence as State's Exhibit No. 13, that he was "reporting to one of my G's . . . my official G's" pursuant to Rule 403, SCRE, since the remark was a reference to gangs and any probative value of the evidence was substantially outweighed by the danger of unfair prejudice.

"Although relevant, evidence may be excluded if its probative value is substantially outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury, or by considerations of undue delay, waste of time, or needless presentation of cumulative evidence." Rule 403, SCRE. Unfair prejudice pursuant to Rule 403 "is the tendency of the evidence to suggest a decision based on something other than the legitimate probative force of

the evidence." State v. Phillips, 430 S.C. 319, 328, 844 S.E.2d 651, 656 (2020) (citing State v. Gray, 408 S.C. 601, 616, 759 S.E.2d 160, 168 (Ct. App. 2014)).

Unlike the assistant solicitor argued at trial, Appellant's comment that he was "reporting to one of my G's . . . my official G's" was not evidence of malice nor did it establish motive. Consequently, it had no probative value. However, the remark was unfairly prejudicial to Appellant because it suggested a decision based on an improper reason, namely that Appellant was associated with a gang. Notably, the trial court failed to conduct a proper balancing test before ruling the evidence was admissible. He merely found the comment was a statement by Appellant shortly before the "alleged commission of a crime" and therefore admissible. When a proper balancing test is performed, it is clear that any probative value of the comment was substantially outweighed by the danger of unfair prejudice to Appellant given that the jurors would have understand the remark to mean Appellant was a member of or associated with a gang and convicted him for that reason.

Respectfully, this Court should hold the trial court erred by refusing to redact the comment before admitting the Snapchat video as State's Exhibit No. 13, reverse Appellant's conviction and sentence, and remand for a new trial.

3.

The trial court erred by sentencing Appellant to a consecutive term of five years imprisonment for possession of a weapon during the commission of a violent crime where the court erroneously found the sentence had to be served consecutively to the sentence imposed for the violent crime since pursuant to S.C. Code Ann. § 16-23-490(B) the court had discretion to order the five year sentence be served consecutively or concurrently.

Relevant Facts

During sentencing, the assistant solicitor told the court that the sentencing range for murder is thirty years to life without parole and that any sentence imposed must be served day for day. He further stated that the five year sentence for the weapons offense must be imposed "*consecutive per statute*." R. 230, ll. 6-15 (emphasis added). Defense counsel acknowledged that the mandatory minimum sentence for murder is thirty years and that the offense carries up to life without parole. In requesting mercy for Appellant, counsel asserted, "[F]or him [Appellant] . . . 30 years, which is the minimum, *plus* the five years for the possession [of a weapon offense], that is going to be a lot of his life, probably all of it." R. 231, ll. 9-14 (emphasis added).

After imposing the five year sentence for possession of a weapon during the commission of a violent crime, the court stated, "That is *to run consecutive by statute* with Indictment 2019-GS-26-04608 for the crime of murder." R. 231, l. 25 – 232, l. 11 (emphasis added). Notably, because the court found the five year sentence for the weapons offense had to run consecutive pursuant to statutory law to the sentence imposed for murder, it did not exercise its discretion in determining whether to run the five year sentence concurrently or consecutively to the forty-three year sentence imposed for murder. See R. 231, l. 25 – 232, l. 11. Defense counsel did not object to the sentence imposed.

Discussion

The trial court erred by sentencing Appellant to a consecutive term of five years imprisonment for possession of a weapon during the commission of a violent crime where the court erroneously found the sentence had to be run consecutively to the sentence imposed for the violent crime since pursuant to S.C. Code Ann. § 16-23-490(B) the court had discretion to order the five year sentence be served consecutively or concurrently.

Section 16-23-490 states in relevant part:

> (A) If a person is in possession of a firearm or visibly displays what appears to be a firearm or visibly displays a knife during the commission of a violent crime and is convicted of committing or attempting to commit a violent crime as defined in Section 16-1-60, he must be imprisoned five years, in addition to the punishment provided for the principal crime. This five-year sentence does not apply in cases where the death penalty or a life sentence without parole is imposed for the violent crime.
>
> (B) Service of the five-year sentence is mandatory unless a longer mandatory minimum term of imprisonment is provided by law for the violent crime. **The court may impose this mandatory five-year sentence to run consecutively *or concurrently.***

(emphasis added).

Accordingly, pursuant to subsection (B), the trial court had discretion to impose the five year sentence for the weapons offense to run consecutively *or concurrently*. The court erred by finding the sentence had to "run consecutive by statute." R. 231, l. 25 – 232, l. 7.

While this sentencing error is not preserved for appellate review since defense counsel did not object to the sentence when imposed, in the interest of judicial economy, this Court should hold the trial court erred in finding the five year sentence had to run consecutive pursuant to statute, vacate Appellant's five year sentence, and remand for resentencing on the weapons offense. See State v. Johnston, 333 S.C. 459, 510 S.E.2d 423 (1999) (remanding for resentencing where the sentence imposed was excessive even though no challenge was made to

the sentence at trial); State v. Vick 384 S.C. 189, 682 S.E.2d 275 (Ct. App. 2009) (vacating a sentence for kidnapping in the interest of judicial economy where such sentence was precluded by S.C. Code Ann. § 16-3-910 because the defendant received a concurrent sentence under the murder statute even though no challenge was made to the sentence at trial); State v. Bonner, 400 S.C. 561, 735 S.E.2d 525 (Ct. App. 2012) (vacating the defendant's sentence of life without parole for first degree burglary pursuant to Graham v. Florida, 560 U.S. 48 (2010), which forbids the imposition of a LWOP sentence for a nonhomicide crime committed by a juvenile, even though no challenge was made to the sentence at trial).

Respectfully, this Court should hold the trial court erred in finding the five year sentence for possession of a weapon during the commission of a violent crime had to run consecutive pursuant to statute, vacate Appellant's sentence, and remand for resentencing.

CONCLUSION

Based on the foregoing argument, Appellant respectfully requests this Court reverse his convictions and sentence and remand for a new trial. In the alternative, Appellant requests this Court vacate his sentence and remand for resentencing.

Respectfully submitted,

Lara M. Caudy
Appellate Defender

ATTORNEY FOR APPELLANT

This 28th day of April, 2023.

CERTIFICATE OF COUNSEL

The undersigned certifies that to the best of my ability this Final Brief of Appellant complies with Rule 211(b), SCACR, and the April 15, 2014 order from the South Carolina Supreme Court entitled "Revised Order Concerning Personal Identifying Information and Other Sensitive Information in Appellate Court Filings."

April 28, 2023

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