Court of Appeals of South Carolina

STATE OF SOUTH CAROLINA, Respondent

v.

JOHN EDWARD KRONENBERGER, Appellant

Appellate Case No. 2024-001683

Trial Court Case No. 2023GS1802385

INITIAL BRIEF OF APPELLANT

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TABLE OF AUTHORITIES

Cases

Statutes

STATEMENT OF ISSUES ON APPEAL

The issue in this appeal is whether the Honorable Heath P. Taylor abused his discretion in imposing the maximum sentence on the Appellant following his guilty plea to Voluntary Manslaughter, in which he was sentenced to a term of thirty years, suspended to twenty-two years incarceration. The sentencing judge abused his discretion in imposing a harsh sentence on the Appellant by not considering the totality of circumstances surrounding the events which led to the death of the victim, including the presence of mitigating factors and the applicable law.

STATEMENT OF CASE

The Appellant was arrested in Dorchester County on November 10, 2023, for Murder in violation of Section 16-03-10, South Carolina Code of Laws (1976 as amended) in the death of Charles Crumpler for an incident which occurred on November 9, 2023.

On September 19, 2024, the Appellant entered a plea of guilty to Voluntary Manslaughter and was sentenced by Judge Taylor to thirty years suspended on twenty-two years incarceration.

On September 26, 2024, the Appellant filed a motion for reconsideration of the above sentence. Judge Taylor denied the motion for reconsideration on September 26, 2024.

STANDARD OF REVIEW

"In criminal cases, the appellate court sits to review errors of law only." *State v. Wilson*, 345 S.C. 1, 5, 545 S.E.2d 827, 829 (2001). It is well established in South Carolina that a sentence will not be overturned absent an abuse of discretion, which occurs "when the ruling is based on an error of law or a factual conclusion without evidentiary support." *In re M.B.H.,* 387 S.C. 323, 326, 692

S.E.2d 541, 542 (2010). In the present case, the Court of Appeals is allowed to make its own determination as to whether the sentencing judge abused it's discretion in sentencing Appellant to the maximum thirty years by failing to consider the totality of the circumstances regarding the incident including the presence of significant mitigating circumstances. A finding of fact by a Court sitting without a jury is equivalent to a verdict, thus a sentence will be disturbed only when the finding is clearly erroneous or implies that the judge was influenced by improper motives or that the judge misunderstood the evidence. *See Marshall v. Creel*, 44 S.C. 484 (1895).

STATEMENT OF THE FACTS

On the afternoon of November 9, 2023, Rita Esner and Kevin Tinelli residents of the Summer Wind Apartments in Summerville, Dorchester County, South Carolina, congregated at the fire pit area of the apartment complex where Mr. Tinelli was drinking a vodka cocktail from a large container. The Summer Wind Apartments are modern rental units consisting of several high rise buildings surrounding the common area of a pool, barbeque grills, and a fire pit. The Appellant and his wife resided in an apartment on the first floor which was adjacent to the pool and fire pit commons. At some point that afternoon the Appellant joined Ms. Esner and Mr. Tinelli by the fire pit with his own alcoholic beverage. Ms. Esner left the fire pit to purchase pretzels at the nearby Parker's gas station. The Appellant then left the fire pit shortly thereafter to use the restroom and to make a phone call from his first-floor apartment.

When Ms. Esner returned to the fire pit Charles Crumpler, a fellow Summer Wind Apartment resident, had joined Mr. Tinelli at the fire pit. Ms. Esner, who felt uncomfortable with Mr. Crumpler's presence, decided to go back to her apartment. Mr. Tinelli and Ms. Esner lived in a

top floor apartment of this complex. Because Mr. Tinelli is disabled and walks with a cane, he asked Ms. Esner to bring him his bottle of vodka from their apartment. Ms. Esner returned to the fire pit after retrieving the bottle of vodka for Mr. Tinelli, and then returned to her apartment. Appellant then returned to the fire pit where Mr. Crumpler and Mr. Tinelli were present.

All three men were engaged in drinking their alcoholic beverages as they were conversing among themselves. At some point during this cocktail hour, after numerous hours of drinking, things turned unpleasant among the three men. Mr. Crumpler grabbed Mr. Tinelli's vodka bottle and took eight straight gulps from the bottle. At that point, either the Appellant or Mr. Tinelli made the comment, "look at this guy, he brings nothing to the party but takes what he wants". Mr. Crumpler, apparently agitated by that remark retorted that he had something for the two of them. Appellant and Mr. Tinelli took Mr. Crumpler's statement as a veiled threat that he was going to harm them by either stabbing or shooting them.

In an effort to avoid an altercation with Mr. Crumpler, the Appellant announced that "the party was over" and stated to Mr. Tinelli "Let's go home". Mr. Tinelli replied that he wanted to stay for a little bit longer. The Appellant left the fire pit to return to his first-floor apartment, which was a short distance away. Before he entered his apartment, he heard Mr. Tinelli cry out for help. Appellant believed that he called 911 in response to the cry for help by Mr. Tinelli, although there was no record of such a call.

The Appellant immediately returned to the fire pit where he saw Mr. Crumpler strike the incapacitated Mr. Tinelli, who was sitting in a chair, attempting to ward off Mr. Crumpler with the use of his cane. The Appellant came to the aid of Mr. Tinelli and delivered several blows with his fists

to the head and body of Mr. Crumpler. Mr. Crumpler consequently fell to the ground. The Appellant then picked up one chair and threw it towards the fallen Mr. Crumpler, and a second chair and threw it in a downward manner towards Mr. Crumpler. After the assault, the Appellant then walked back to his apartment. Mr. Tinelli also turned to his apartment and told Ms. Esner that Mr. Crumpler had assaulted him but the Appellant had intervened to save his life.

Another resident of Summer Wind Apartments, Jeffery Chandler, was sitting in his vehicle, with the windows rolled up, which he had backed into a parking spot in the vicinity of the fire pit area, as the above events were unfolding. Mr. Chandler from his line-of-sight had a direct view of the fire pit. In a voluntary statement he noted that he was able to observe a commotion among three men. [TR 13]. He was however unable to hear any of the conversation among them. Mr. Chandler observed the Appellant, identified by his clothing, push Mr. Crumpler to the ground, throw a chair at Mr. Crumpler, and then a second chair at him in more of a downward motion.

Shortly thereafter, the police arrived and arrested the Appellant. Mr. Crumpler was immediately transported to a local hospital where he soon succumbed to his injuries. The autopsy report cited Mr. Crumpler's death was caused by blunt force trauma to his head, face, and ribs. Mr. Crumpler's blood alcohol content was at .257, three times over the legal limit. There is no evidence that either of the chairs thrown at Mr. Crumpler struck him, let alone contributed to his demise. Mr. Tinelli and Ms. Eisner and the Appellant's wife, along with other apartment residents were interviewed. Law enforcement officials were unable to locate any other eyewitnesses who observed the interaction of the three men at the fire pit, beyond the information supplied by Mr. Chandler, Ms. Eisner and Mr. Tinelli.

The Appellant is 62 years old, in poor health, suffering from prostate cancer which has not been treated for almost a year since he has been detained. During the September 19, 2024, sentencing hearing the Appellant provided information from his treating physician of the Appellant having been diagnosed with prostate cancer and the absence of any treatment of this curable disease. [TR 14]. The Court was provided with a host of other material mitigating facts including that the victim had communicated a very real threat to the Appellant and a third party, that the Appellant attempted to de-escalate the threat, that the decedent was the aggressor, that the decedent several times struck a helpless, defenseless man, the Appellant came to the aid of another and no weapons were used in this assault. However, these points apparently agitated the sentencing judge, and he retorted that the Appellant should just have a trial [TR 12, Page 33, 8-11]. Subsequently, as the hearing proceeded, the Court again retorted that the Appellant should proceed to trial because "He didn't, he didn't do anything until Mr. Crumpler did something" [TR 12, Page 36, 13-14]. Further, the Appellant's prior criminal record consisted of minor bar fights, over 10 years ol, with no serious felony convictions. He retired after 30 years as a butcher in New York as a butcher.

ARGUMENT

I. The sentencing court abused its discretion in sentencing Appellant to the maximum sentence for Voluntary Manslaughter of thirty years suspended to twenty-two years incarceration.

The sentencing judge abused his discretion in imposing the maximum sentence on the Appellant. "An abuse of discretion occurs where conclusions of the trial court are either controlled by an error of law or lack of evidentiary support" *State v. Winkler*, 388, S.C. 574, 583, 698 S.E.2d

596, 601 (2010). "A judge or other sentencing authority is to be accorded very wide discretion in determining an appropriate sentence and must be permitted to consider any and all information that might reasonably bear on the proper sentence for the particular defendant, given the crime committed" *State v. Hicks*, 377 S.C. 322, 325, 659 S.E.2d 499, 500 (Ct. App. 2008).

South Carolina law does not specifically outline factors for a sentencing judge to consider in imposing a sentence, as Title 17, South Carolina Code of Law, (1976 As Amended) is silent in providing any factors for guidance. Federal law however has adopted Title 18, U.S.C. § 3553 which states that an United States district judge shall impose a sentence that is "sufficient, but not greater than necessary" to comply with the purposes set forth in paragraph (2) of this subsection. The court, in determining the sentence to be imposed, shall consider—

(1) the nature and circumstances of the offense and the history and characteristics of the defendant;

(2) the need for the sentence imposed—

(A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense;

(B) to afford adequate deterrence to criminal conduct;

(C) to protect the public from further crimes of the defendant; and

(D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner;

While Federal law is not binding upon a state court judge, except of course in not violating any Article or Amendment of the United States Constitution, the above section however, has codified the

basic principles for a sentencing court to employ in determining an appropriate sentence. The phrase "sufficient but not greater than necessary" provides a clear guideline to a sentencing court in order to determine a sentence which is fair and justifiable. It is respectfully submitted the circumstances discussed herein that the Court imposed the maximum sentence of thirty years, albeit suspended upon twenty-two years, failed to adhere to the guardrails of this very basic principle of American Jurisprudence.

For instance, in applying the standard outlined in Section 3553 a sentencing court should consider the history and characteristics of the Appellant. The Appellant at the time of this homicide was a retired butcher who is suffering from prostate cancer. The Court was not confronted with a man of bad character who needed to be rehabilitated or severely punished. As noted in paragraph 2 of Section 3553 the Court failed to consider the need to defer the Appellant from further criminal conduct and the need to protect the community. The Appellant has a lot of support in the community as referenced in the sentencing hearing from his wife, sister, brother-in-law, and numerous friends speaking on his behalf. [TR 12]. The Appellant's conduct consisted of a retired intoxicated man coming to the aid of a disabled friend who was getting beaten by another intoxicated man. As Appellant asserted in the sentencing hearing, he has previously witnessed his best friend 44 years ago scream for help, in the same manner that Mr. Tinnelli did. [TR 12, Page 28-29]. Appellant asserts that 44 years ago he did not come to the rescue of the call for help from his friend and subsequently he drowned in a frozen pond. Mr. Tinelli's scream unleashed Appellant's repressed memory, and he went back to the fire pit to help someone in need who was being ruthlessly assaulted.

Applying the above principles cited in Title 18, U.S.C., Section 3553, the United States Congress adopted the Sentencing Reform Act of 1984. This law established the United States Sentencing Commission and the United States Sentencing Guidelines, (USSG). As a consequence, if the Appellant had pled guilty in U.S. District Court to Manslaughter, he would be sentenced pursuant to USSG, Section 2A1.3 (a) to a range of 63-78 months. This federal sentence of between five and six & one-half years would be consistent of a sentence "sufficient, but not greater than necessary" to satisfy the ends of justice. Such a sentence would reflect the seriousness of the offense, a homicide, it provides deterrence to others who get into a fight while intoxicated, and it protects society from the Appellant, an older fella with a limited criminal background, retired from decades of hard work. In addition, it would not serve as a de facto death sentence in which the Appellant, a person of poor health who is not eligible for parole until well into his 80s. Under the circumstances of his untreated cancer, he will be dead before ever realizing the opportunity of release from prison.

The Appellant was originally charged with Murder in violation of Section 16-03-10, South Carolina Code of Laws (1976 as amended), [TR 1] and as a result of plea discussions, the State offered the Appellant a plea to Voluntary Manslaughter under Section 16-03-50, S.C. Code of Laws (1976 as amended), with the State to remain silent on sentencing, demurring to the sentencing judge's discretion. As demonstrated herein, the sentencing judge clearly abused its discretion in failing to consider the total factual circumstances of the events which led to this homicide. The Court in misunderstanding the facts supporting the plea, including the myriad mitigating factors

presented, grossly misapplied the applicable law of defense of others, and the application of sufficient legal provocation, justifying the Appellant's guilty plea of Voluntary Manslaughter.

The Appellant asserts the sentence of thirty years suspended to twenty-two years is arbitrary and capricious and was made in total disregard of those factual mitigating circumstances surrounding the events which led to the death of Mr. Crumpler. "A sentencing judge may appropriately conduct an inquiry broad in scope, largely unlimited as to either the kind of information he may consider, or the source from which it may come." *Hayden v. State*, 283 S.C. 121, 123, 322 S.E. 2d 14 (1984). The sentencing judge failed to exercise any degree of discretion which provided a grossly disproportional sentence to the Appellant, by failing to consider the information surrounding the events prior to the infliction of the fatal blows.

Sentencing judges are challenged with the responsibility of balancing the particular circumstances of each case and weighing those factors and conditions to assert a just sentence. Expressly written "while one violating the law must be punished, it is the writer's observation that neither the certainty of punishment nor the severity of sentences deters persons bent on violating the law," *State v. Hall*, 224 S.C. 546, 548, 80 S.E.2d 239 (1954).

The General Assembly has provided for the punishment of Manslaughter the broad range of two to thirty years, a scope of 28 years. Any sentence must be based on the need to punish the offender while balancing the needs of public safety, satisfying the ends of justice. Sentencing judges who usurp this charge in the exercise of their sworn duty have by definition abused its discretion.

Apparently, the sentencing judge misconstrued the applicable law by seemingly evaluating the Appellant's conduct as a murder, when by all counts was a classic case of Voluntary Manslaughter. Murder is defined by Section 16-03-10 as the killing of any person with malice aforethought, either express or implied. Voluntary Manslaughter is the unlawful killing of another in the heat of passion with sufficient legal provocation. *State v. Gilliam*, 296 S.C. 395, 373 S.E.2d 596 (1988). In evaluating what occurred at the fire pit on that fateful November evening with the four actors involved, absence of malice aforethought was clearly evident, thus prompting the State to have offered and Appellant having accepted a guilty plea to Voluntary Manslaughter. [TR 12, Page 5,6]

This case factually is, and has been since the beginning, a crime of Manslaughter, not Murder. Absent from the facts giving rise to the criminal charge against the Appellant is the presence of malice aforethought as Appellant acted without the intent to kill. It was never in question that the Decedent died as a result of the physical blows inflicted by Appellant. It is obvious that the Appellant, while intoxicated, reacted to the call for help from Mr. Tinelli, and then struck the Decedent with his fists out of an emotional reaction to his incapacitated friend being beat up. [TR 12, Page 29, 3-25].

The undisputed facts was that these three men had congregated around a common area of this apartment complex, the fire pit, while they unquestionably consumed numerous alcoholic beverages. The Decedent consumed so much alcohol that his blood alcohol content was .257, three times higher than the legal limit.

It is also unquestioned that the Decedent made a veiled threat to both Mr. Tinelli and the Appellant. They perceived it to be an actual direct physical harm, which caused Appellant to want to end the "social gathering". It is undisputed that Mr. Tinelli is an incapacitated man who was helplessly seated while being assaulted by the Decedent in the presence of the Appellant.

Under South Carolina law, heat of passion provocation must "produce in the mind of persons ordinarily constituted, the highest degree of exasperation, rage, anger, sudden resentment or terror, rendering the mind incapable of cool reflection." *State v. Davis,* 50 S.C. 405, 423, 27 S.E. 905, 911 (1897). There is no question that the Appellant acted in rage and anger towards the Decedent; however, the Decedent undeniably provoked Appellant causing the outrage. The Defense of Others doctrine asserts that "one is not guilty of taking the life of an assailant who assaults a friend, relative, or bystander if that friend, relative, or bystander would likewise have the right to take the life of the assailant in self-defense." *State v. Long*, 325 S.C. 59, 64, 480 S.E.2d 62, 64 (1997). Here, an incapacitated Mr. Tinelli had cried out for help from being physically assaulted by Mr. Crumpler. As a result, the Appellant intervened by coming to the aid of Mr. Tinelli by striking with his fists the victim in an effort to protect Mr. Tinelli from being violently assaulted and perhaps killed by the Decedent.

The combination of these facts support a reduction of the offense from Murder to Manslaughter while not exonerating by any measure the acts of the Appellant, which he clearly admitted. As noted in the transcript of the plea hearing the incapacitated assault victim affirmed that the Appellant saved his life by intervening. [TR 12, Page 26]. The sentencing judge failed to apply

those facts, accepted by the State, with the legal principles of sufficient provocation and Defense of Others when imposing his sentence.

As previously stated, the State did not refute any of the facts surrounding what occurred that evening as presented by the Appellant. Appellant provided overwhelming mitigating factors the sentencing judge failed to consider, thus rendering an unjust sentence, one not based on an individual assessment of the totality of the facts presented. Those mitigating factors presented at the time of Appellants guilty plea are as follows;

i. Decedent threatened to physically harm the Appellant and Mr. Tinelli;

ii. The Appellant removed himself from a hostile situation created by the Decedent;

iii. Decedent was highly intoxicated on the night of the incident, 3 times over the legal limit;

iv. Decedent assaulted an incapacitated trapped man on the night of the accident;

v. Appellant came to the aid of the incapacitated trapped victim who was assaulted by the Decedent;

vi. The absence of any weapon utilized by the Appellant;

vii. Appellant's absence of any appreciative prior criminal record

viii. Defendant's age, 62 years.

ix. Defendant's untreated Stage IIB prostate cancer diagnosis.

x. The Appellant will have to serve 85% of 22 years which makes him eligible for parole when he is almost 81 years old;

As noted above "an abuse of discretion occurs where the conclusions of the trial court are either controlled by error of law or lack of evidentiary support" *Winkler*, 388 S.C. at 583, 698 S.E.2d at 601. The September 19, 2024, plea hearing record makes it clear that the sentencing judge blatantly overlooked the mitigating circumstances outlined by the Appellant, namely Appellant's deteriorating heath, the victim's blood alcohol content, the aggressive actions of the Decedent, the Appellant's attempt to defuse the aggressiveness and threats by the victim, and the Appellant's intervention to assist a disabled friend. [TR 12].

Judge Taylor was dismissive throughout the plea hearing and iterated that "Well, I'm beginning to think he just needs a trial. That's about what I've been listening to for the past 45 minutes. Is he did it, but he didn't really do it." [TR 12, Page 33, 9-11]. There is no question that Appellant assaulted the victim who died from those blows; however, Appellant reacted to a helpless friend being beaten. Decedent made a real threat to Mr. Tinelli and the Appellant. The sentencing judge had the opportunity to impose a sentence between two years to thirty years and picked the latter. The record makes it clear that the sentencing judge was disturbed by the Appellant's recommendation of ten years suspended to the mandatory minimum of two years despite the totality of the circumstances that occurred the night of November 9, 2023, as noted above. [TR 12].

The dismissiveness by Judge Taylor of the significant mitigating factors is confirmed by him not weighing any of the issues in the Motion for Reconsideration of his sentence. The Court issued a mere half page ruling without making any specific findings qualifying his sentence of

thirty years, by not distinguishing the facts from other homicide cases, and in failing to observe the myriad factual mitigating circumstances in arriving at a sentence with much less severity. One would have expected a judge to contemplate a response from the State or at least respond to some level of to issues referenced in the Motion for Reconsideration.

The sentencing judge declared "While I do agree there are **some** extenuating circumstances, I certainly don't think – well, I think the sentence that the defense is asking for would ask me to ignore that there's even a dead body in the case," [TR 12, Page 37, 17-20] This comment of "some" certainly overlooks the more than overwhelming number of facts to be considered in weighing a reasonable sentence.

The plea judge is "permitted to consider any and all information that reasonably might bear on the proper sentence for the particular defendant, given the crime committed." *Hicks,* 377 S.C. at 325, 659 S.E.2d at 500. The maximum sentence imposed when looking at the totality of circumstances that occurred surrounding this unfortunate incident is unreasonable and disproportionate.

CONCLUSION

For the foregoing reasons, it is respectfully submitted that the judgment and sentence of the lower court be vacated, as the sentencing judge blatantly abused his discretion in imposing a sentence by failing to consider the factual totality of the circumstances supporting the offense of Manslaughter, the uncontroverted mitigating factors and misapplying the applicable law.

Respectfully submitted,
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January 24, 2025

Charleston, South Carolina

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Heath P. Taylor, Circuit Court Judge

Appellate Case Number 2024-001683

The State, ...Respondent,

v.

John Edward Kronenberger,..Appellant.

CERTIFICATE OF SERVICE

This is to certify that on this date, January 24, 2025, I served the Appellant Initial Brief and Designation of Matter To Be Included in the Record of Appeal in the above-captioned to the following individuals via US Mail:

- Catherine Harrison, Deputy Clerk, The South Carolina Court of Appeals, PO Box 11629, 1220 Senate Street, Columbia, SC 29211.
- Alan McCrory Wilson, South Carolina Attorney Generals Office, PO Box 11549, Columbia, SC 29211.
- Mark Reynolds Farthing, South Carolina Attorney Generals Office, PO Box 11549, Columbia, SC 29211.
- David Pascoe and Jaquon Irby, Office of the Solicitor, First Judicial Circuit, 101 Ridge Street, 2nd Floor, St. George, South Carolina, 29477 .

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January 24, 2025

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RE: The State v John E. Kronenberger
Appellate Case No: 2024-001683

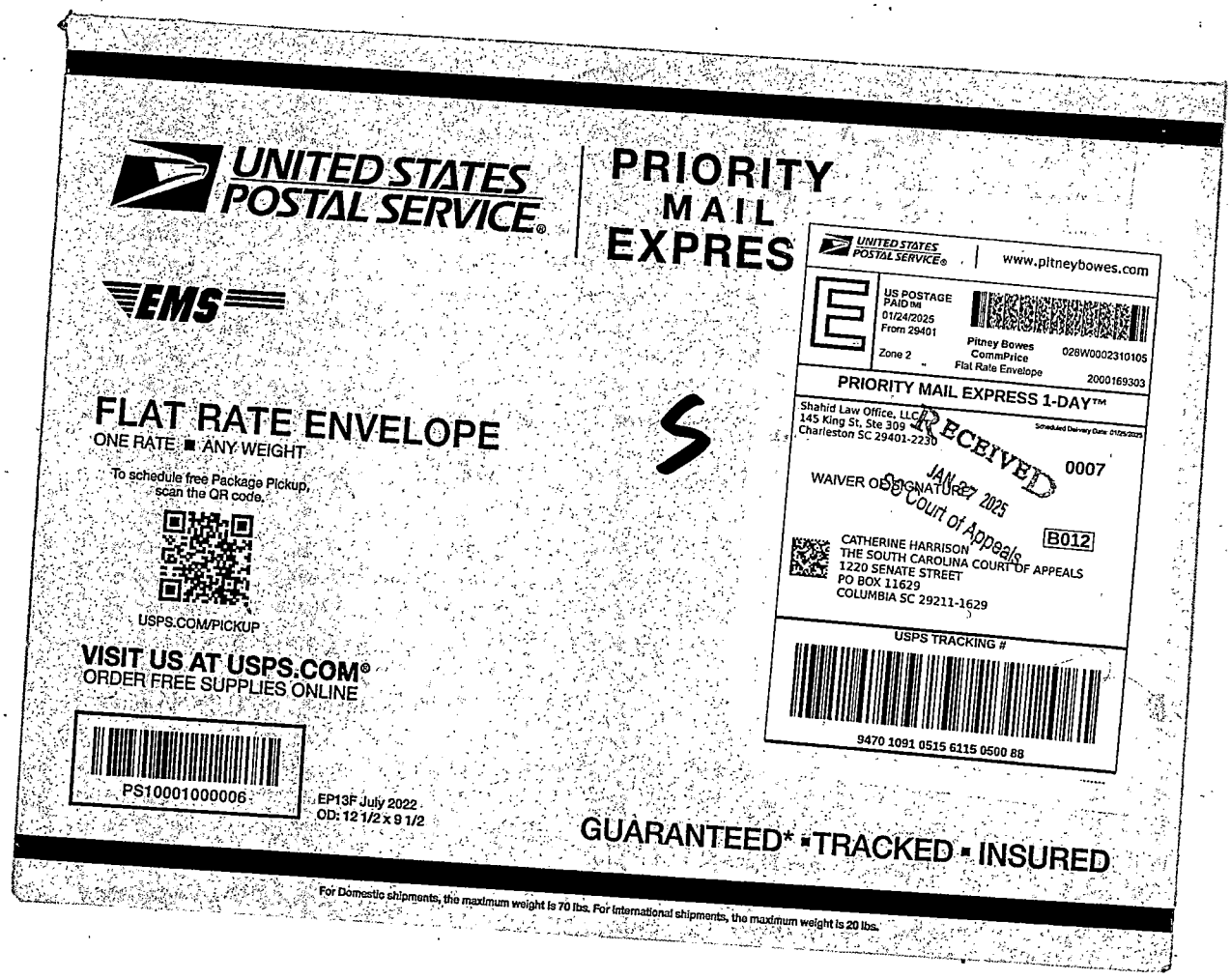
Dear Ms. Harrison,

Please find enclosed the Appellant Initial Brief and Designation of Matter to Be Included in the Record on Appeal as well as the Certificate of Service in the above matter. Thank you for your assistance with this matter. Please advise if you require any additional information.

Very truly yours,

A. Peter Shahid, Jr.

Enclosures
cc: Alan McCrory Wilson, Esquire
Mark Reynolds Farthing, Esquire
David Michael Pascoe, Jr. Esquire
Jaquon Edmar Irby , Esquire



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