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SC Court of Appeals

STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of General Sessions

The Honorable William P. Keesley, Circuit Court Judge

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App. Case No. 2025-000305

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State of South Carolina ........................................................................................ Respondent,

vs.

Ivy Tyrone Richardson, Jr. ........................................................................................ Appellant.

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**APPELLANT'S INITIAL BRIEF**

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## STATEMENT OF ISSUES ON APPEAL

1. **DID THE TRIAL COURT ERR IN FAILING TO DISMISS INDICTMENT 2023-GS-32-04011 ON THE GROUNDS THAT IT WAS DEFECTIVE AND HIGHLY PREJUDICIAL TO APPELLANT?**

2. **DID THE TRIAL COURT ERR IN REFUSING TO DIRECT A VERDICT IN FAVOR OF APPELLANT IVY TYRONE RICHARDSON, JR.?**

## STATEMENT OF THE CASE

This appeal arises out of a conviction of Appellant Ivy Tyrone Richardson, Jr. on an Indictment for the lesser included offense of Assault and Battery (2023-GS-32-04009) on February 13, 2025. Prior to commencement of trial, the Court, over the objection of counsel for Appellant, allowed Respondent to amend Indictment 2023-CP-32-04011 and correct the error contained therein on the grounds that it was a scrivener's error. (TR. p. 29, line 13 – p. 30, line 5).

The trial commenced on February 10, 2025. (TR. p. 121, line 22). Appellant was charged with four (4) separate indictments: 2023-GS-32-04009 for attempted murder; 2023-GS-32-04010 another indictment for attempted murder; 2023-GS-32-03999 for discharge of a firearm into a vehicle; and finally 2023-GS-32-04011 for alleged ill treatment of animals. (TR. p. 25, line 17 – p. 28, line 10). At the close of the Respondent's case, Counsel for Appellant moved to strike Indictment 2023-CP-32-04011 on the ground that:

> …[I]t could not be a scrivener's error in terms of the interpretation of it because it was clearly on the face of the indictment it had the date that the shot occurred, so it could not have been – it could not have been viewed as a scrivener's error that should have gone forward and they should have gone ahead and moved for an amendment of that indictment before the indictment was ever called.

(TR. p. 416, lines 8-19).

Counsel for Appellant further moved that all indictments against Appellant be dismissed for insufficiency of the evidence. (TR. p. 416, lines 2-23). These motions were all denied by the Trial Judge. (TR. p. 417, lines 1-4). Appellant's motions were renewed at the close of the evidence. (TR. p. 481, line 24 - p. 482, line 8). These motions were denied by the Court. (TR. p. 482, lines 9-12).

On February 13, 2025, the jury returned a verdict against Appellant, finding him guilty of the lesser included offense of Assault and Battery (2023-GS-32-04009) and not guilty as to the

indictment for ill treatment towards an animal (2023-CS-32-04011). Counsel for Appellant renewed all previously made motions. (TR. p. 568. lines 13-17). Once more these motions were denied by the Trial Judge. (TR. p. 568, lines 18-19).

Appellant was subsequently sentenced by Judge Keesley. (TR. p. 568, line 7 – p. 569, line 18). This appeal followed.

## STATEMENT OF THE FACTS

In August of 2023, a "Ms. Sophia Jackson" was living in a house at 105 Lorick Village Road in West Columbia. (TR. p. 428, line 24 – p. 429, line 2). The house and its belongings initially belonged to Appellant's parents and then passed to Appellant, his brother and two sisters after their parents' deaths. (TR. p. 428, lines 10-23). Appellant was not living at the residence at the time. (TR. p. 454, lines 8-12). Ms. Jackson was Appellant's "off and on girlfriend." Prior to trial, counsel for the State informed the Court that Ms. Jackson's present location/whereabouts were unknown and that she would not be testifying at trial. (TR. p. 23, lines 15-20). Prior to the events set forth below, Appellant had initiated proceedings in Magistrate's Court to have Ms. Jackson evicted from the property. (TR. p. 429, line 24 – p. 430, line 7). These efforts were ongoing on the date of the alleged incident which forms the basis of this case.

On August 19, 2023, prior to the date of the incidents which form the basis of the State's charges against Appellant, Ms. Jackson, Appellant's "on and off girlfriend," without his permission or the permission of his siblings, was taking items, furnishings and personal property originally belonging to Appellant's parents out of the house and selling them. This was without the consent of Appellant. (TR. p. 429, lines 10-20). In addition to removing items, these individuals (identified in Court as the alleged victims in this case) were seen burning belongings in the yard. These items included personal belongings, an air-conditioning unit, furniture and clothes

belonging to Appellant and his parents. (TR. p. 444, line 23- p. 445, line 5; TR. p, 469, lines 12-18).

On August 22nd, the day of the incident which forms the basis of the charges against Appellant, Appellant's sister, Yohntis Zenoba Richardson, received a phone call from a neighbor informing her that individuals were once again on the property, removing items. (TR. p. 429, lines 13-20). She then received a phone call from Appellant informing her that Ms. Jackson was once again, with the assistance of several others (later identified as the alleged victims in this case), taking items out of the house. (TR. p. 429, lines 10-20). Ms. Richardson called 911. Appellant informed his sister that he had left his job and was heading to the residence. Ms. Richardson followed.

In route, Ms. Richardson passed a gas station and recognized a pickup truck that she had previously seen at the house. (TR. p. 430, lines 8-16; TR. p. 431, lines 16-18). Ms. Richardson testified that the same pickup (identified as belonging to Mr. Lane) had been at the property "off and on" all week. (TR. p. 430, lines 8-19). Ms. Richardson followed the pickup to the house, watching it park in front. She noticed that someone in the truck was carrying what she believed to be a rifle. (TR. p. 430, line 20 – p. 431, line 15). She recognized them as the same individuals who had previously been removing items from the house and setting them on fire in the yard. (TR. p. 452, line 14 – p. 453, line 21). Ms. Richardson took and had previously taken photographs of these individuals and the truck at the property. These photographs were taken a day before the incident which forms the basis of the State's case against Appellant. These photographs were admitted into evidence. (Defendants/Appellant's Exhibit No. 1) (Defendants/Appellant's Exhibit 3). These individuals were positively identified as the alleged victims in this case. (TR. p. 452, lines 5-8).

Ms. Richardson testified that the individuals had previously been asked multiple times to stay away from the property and to quit taking items out of the house that did not belong to them. (TR. p. 432, lines 2-17). Ms. Richardson testified that when she asked the individuals to stop doing this, she was threatened. (TR. p. 432, lines 2-17). Ms. Richardson and her sister, India Hybea Richardson, both testified that they and their brother had been threatened by these individuals. (TR. p. 431, lines 8-16; TR. p. 469, lines 4-18). She had seen them brandish a shotgun during their previous trips to the property to remove and/or destroy items belonging to Appellant's family. She also identified these individuals in the Courtroom as the alleged victims. (TR. p. 431, line16 – p. 432, line 2; TR. p. 452, line 1 – p. 453, line 25). Ms. Richardson testified that prior to the day in question (August 22, 2023), law enforcement had been contacted on multiple occasions regarding these individuals and their actions, but that law enforcement had taken no action against them. (TR. p. 432, line 19 – p. 433, line 4). She testified that she personally contacted law enforcement on the day of the shooting, but no one responded to her call.

Ms. India Hybea Richardson also testified that she had seen the same individuals (identified in the Courtroom), removing items from the house and placing them in a trailer in the days leading up to the events of August 22nd. (TR. p. 470, lines 2 – 18). She too testified that she had notified the authorities regarding the actions of these individuals. (TR. p. 470, lines 16-23). Both sisters testified that up until the events of August 22nd, law enforcement had not taken any action against either Ms. Jackson or any of the other alleged victims in this case for taking property out of the house without permission of its owners. Ms. Richardson testified that she was across the street from her parents' house at the time the shooting occurred, but did not see the shooter.

On August 22, 2023, at approximately 6:09 PM, Lexington County 911 received a phone call of shots fired at 105 Lorick Village Road in West Columbia. (TR. p. 135, line 21 – p. 136, line

16). Records showed that, when the call came in, it came from an individual named Jacob Lane. There was what appeared to be a television playing in the background. (TR. p. 145, lines 9-19). The source of this noise was never accounted for.

The first officer who arrived on scene, Deputy Tyler Douglass, observed Jacob Lane sitting off of the side of the driveway with what appeared to be multiple gunshot wounds. (TR. p. 153, lines 2-8). After placing a tourniquet on Mr. Lane, Deputy Douglass heard a "disturbance" "in the wood line" behind the house. This sounded like a male and a female engaged in an argument. (TR. p. 154, ll. 17-25). Mr. Lane told Deputy Douglas that "they ran down there." (TR. p. 155, lines 17-24). Deputy Douglas approached the area and found Appellant and Ms. Jackson. (TR. p. 156, lines 4-15). Appellant, but not Ms. Jackson, was detained and taken back to the patrol vehicle. (TR. p. 156, lines 12-15). Deputy Douglas observed a truck off near the wood line along with a boat and some personal items. (TR. p. 159, lines 10-15). Deputy Douglas testified that he looked inside of the truck but did not see a shotgun. (TR. p. 170, lines 1-7). He testified that he was not aware of anyone doing an initial search of the truck to see if there were any weapons inside of it.

Deputy Douglas then attempted to secure the area both inside and outside of the house. After obtaining a search warrant at approximately 10 PM, he discovered an empty gun case inside of the house. He also discovered a dog inside of the house in a bedroom with what appeared to be a gunshot wound to its nose. (TR. p. 273, lines 2-4). There was "a lot" of blood on the bathroom floor. (TR. p. 163, lines 7-23). Photographs of the wounded animal were shown to the jury by Deputy Douglas. (TR. p. 164, lines 8-16) (State's/Respondent's Exhibit 7). Deputy Douglas testified that he had not previously seen or heard the dog inside the house when he initially secured the area. He testified that between the time of his arrival and the discovery of the dog, the scene was "pretty chaotic." (TR. p. 179, line 23). Deputy Douglas testified that he had no idea how the

dog got from outside where it was apparently shot, to the inside of the house. (TR. p. 173, line 15 – p. 174, line 1).

The State called Sergeant Willie Harris. (TR. p. 186, line 25). He accompanied Deputy Douglas back into the wood line where Appellant was apprehended. (TR. p. 191, line 19 – p. 193, line 7). Sergeant Harris testified that later, once the house was checked, several hours after he first responded, he observed a dog with a gunshot wound to its face inside of the house (TR. p. 208, lines 5-20). Sergeant Harris testified that Animal Control was contacted regarding the wounded animal.

Sergeant Harris further testified that later a shotgun and live ammunition was found in the pickup that was located near the wood line. (TR. p. 215, lines 8-25; p. 216, line 12 – p. 217, line 21). He testified that the shotgun was found in the pickup truck after it had been removed from the scene. It was found under the seat away from the driver and passenger compartments. This was the first time that the truck had been searched to Sergeant Harris' knowledge and belief. He had no knowledge as to whether or not any fingerprint analysis or residue testing was done on the shotgun.

Sergeant Harris went back into the woods where he encountered both Appellant and Ms. Jackson. Sergeant Harris was directed to an AR-15 leaning up against a tree by Appellant. (TR. p. 196, lines 16-23; p. 197, lines 1-16). Appellant informed Sergeant Harris, "I called you 20,000 times, what did you expect me to do." (TR. p. 196, lines 12-14). Sergeant Harris further testified that Appellant appeared to be upset and angry regarding "the property situation." (TR. p. 198, ll. 10-17). He was not aware if any fingerprint or residue testing was done on the AR-15. He did not conduct any investigation to see whose name was attached to the AR-15. (TR. p. 228, lines 1-19).

The State called Jacob Lane, one of the alleged victims. Mr. Lane testified that he did not see Appellant fire the shots in question and that he only saw Appellant with a rifle after the fact. Mr. Lane conceded that he had, prior to August 22nd, assisted Ms. Jackson in removing furniture and belongings from the residence, but described these as junk. (TR. p. 161, lines 22-25; p. 262, line 6). The State also called Michael Combs, the other alleged victim who, like Mr. Lane, did not see who actually fired the shots. Mr. Combs also admitted to removing "junk" from the house prior to August 22nd. (TR. p. 267, lines 20-25).

The State called Deputy Robert Spires. (TR. p. 283, line 15). Deputy Spires testified that on the day in question, August 22nd, he responded to a call made by Appellant regarding a "burglary in question." (TR. p. 284, lines 6-23). It was Deputy Spires' belief that the call had been made by Appellant. (TR. p. 285, lines 3-4). Appellant reported to Deputy Spires that his former girlfriend, Ms. Jackson was "giving away his property." (TR. p. 285, lines 18-23). Deputy Spires testified that Lexington County Law Enforcement was already aware of the issues involving the removal of items from the Appellant's parents' home and that it was his understanding that law enforcement had responded at least two times prior to his encounter with Appellant Mr. Richardson. (TR. p. 291, line 9 – p. 292, line 1)

Mr. Richardson informed Deputy Spires that he was "under a Court Order" not to be at the residence. Deputy Spires testified that he informed Mr. Richardson that this was a "civil issue" since Ms. Jackson was living at the property. (TR. p. 288, lines 1-17). Deputy Spires testified that Appellant became "agitated" on hearing that law enforcement was not going to be able to assist him in protecting his parents' property. (TR. p. 288, lines 1-25). Deputy Spires did not question Appellant about his ongoing efforts to have Ms. Jackson evicted from the property.

The Respondent called Crime Scene Investigator Brenda Snelgrove to testify. (TR. p. 296, line 20). She testified that on August 22, 2023, she was a Sergeant over the Crime Scene Unit. (TR. p. 297, lines 2-6). She was qualified as an expert without objection. (TR. p. 300, line 8).

Sergeant Snelgrove testified that she removed evidence including shell casings and shattered glass from the crime scene at 105 Lorick Village Road. Among the evidence removed from the scene was an empty rifle case, found inside of the house. (TR. p. 315, line 22 – p. 316, line 2). Sergeant Snelgrove also noticed, during her inspection of the Dodge Ram pickup belonging to one of the alleged victims, the butt of a gun. (TR. p. 391, line 20 – p. 320, line 21). Along with the weapon, Sergeant Snelgrove also found unfired ammunition attached to the gun. Sergeant Snelgrove testified that the shell casings removed from the scene were never tested to see if they were from the AR-15 recovered at the scene. (TR. p. 332, lines 10-24). In fact, there was no ballistic testing conducted at any time through the course of this investigation, nor were any individuals (or animals) tested for residue.

Respondent called Bryan Senn, an Investigator in the major crimes unit. (TR. p. 347, lines 1-13). He responded to the scene and assisted Sergeant Snelgrove. Investigator Senn recovered a shell fragment, located approximately ten (10) feet up a pine tree on the Lorick Village property. (Tr. p. 351, line 12 – p. 354, line 20). Investigator Senn testified that he could not determine from what weapon the fragment was fired from, where the fragment was fired from, or how long the bullet fragment had been there (Tr. p. 359, lines 12-14).

## STANDARD OF REVIEW

In criminal cases, the Appellate Court sits to review errors of law only. *State v. Wilson,* 345 S.C. 1, 5–6, 545 S.E.2d 827, 829 (2001); *State v. Wood*, 362 S.C. 520, 525, 608 S.E.2d 435, 438 (Ct.App.2004). The Appellate Court is bound by the trial court's factual findings unless they are

clearly erroneous. See, *State v. Abdullah,* 357 S.C. 344, 349, 592 S.E.2d 344, 347 (Ct.App.2004); *State v. Edwards,* 373 S. C. 230, 645 S.E. 2d. 66 (Ct. App. 2007), *aff'd as modified,* 383 S.C. 66, 678 S.E. 2d. 405 (2009).

## ARGUMENTS

### I. THE TRIAL COURT ERRED IN FAILING TO DISMISS INDICTMENT 2023-CP-32-04011 ON THE GROUNDS THAT IT WAS DEFECTIVE AND HIGHLY PREJUDICIAL TO APPELLANT

Prior to trial, the Trial Court allowed Respondent, over the objection of counsel for Appellant to amend Indictment 2023-CP-32-04011 and correct the error contained therein on the grounds that it was a scrivener's error. (TR. p. 29, line 13 – p. 30, line 5). There was no evidence presented that this was a "scrivener's error." The Court made this assumption without any evidence that it was a scrivener's error as opposed to an error. This was certainly not a minor error on the indictment for alleged ill treatment of an animal. Instead, it was clearly on its face wrong as it contained the absolutely wrong and incorrect date. The Court relied on the case of *Carrier v. State of South Carolina,* 441 S. C. 547, 895 S.E. 2d, 679 (Ct. App. 2023), and the cases cited therein. The Court did not rely on South Carolina Code Section 17-19-100 in reaching its decision in not dismissing the Indictment. In *Carrier,* the Court allowed an amendment to an indictment on the grounds that it was "…merely one of form…which would have no bearing on the rest of the trial process." 441 S.C. at 564, 895 S.E.2d. at 688.

This case is distinguishable from *Carrier* in that the Appellant was clearly prejudiced by the charges contained in this indictment. Prior to the oral arguments, the jury heard the charges contained in this indictment set forth in graphic detail by the Trial Judge. (TR. p. 27, line 20 – p. 28, line 10). Because of the Court's failure to dismiss the indictment, the jury heard extensive testimony from the State's/Respondent's witness, a veterinarian, Dr. Jennifer Bonnema (TR. p. 389, line 9 – p. 415, line 11). This testimony was relevant only because of the existence of the

erroneous indictment arising out of the mistreatment of a dog. The jury heard graphic testimony regarding injuries to the dog, and the fact that the dog had to be euthanized after the incident in question in this case. This error was compounded by the fact that the jury found Appellant "not guilty" of the charges contained in this document. However, as a result of the Court's failure to dismiss this indictment and to allowing the State to amend this indictment, the Appellant was clearly prejudiced by this evidence. This case is therefore distinguishable from the cases relied upon by the Court in its Order.

There was no evidence presented at trial as to the reason for the clear error on the indictment. The Court unilaterally determined that the indictment was merely a minor scrivener's error without any evidence as to what the error actually was. Further, the Appellant was clearly prejudiced by allowing this clearly erroneous indictment to proceed to the jury.

## II. THE TRIAL COURT ERR IN REFUSING TO DIRECT A VERDICT IN FAVOR OF APPELLANT IVY TYRONE RICHARDSON, JR.

The jury returned a verdict against Appellant for Assault and Battery of a High and Aggravated Nature ("ABHAN"). ABHAN requires an unlawful act of violent injury accompanied by circumstances of aggravation. *State v. Sprouse*, 325 S.C. 275, 286 n. 2, 478 S.E.2d 871, 877 n. 2 (Ct.App.1996). Such aggravating circumstances include the use of a deadly weapon, the infliction of serious bodily injury, the intent to commit a felony, great disparity between the ages and physical conditions of the parties involved, and the difference in the sexes. *State v. Murphy,* 322 S.C. 321, 324–25, 471 S.E.2d 739, 740–41 (Ct.App.1996).

"In reviewing a motion for directed verdict, the trial court is concerned with the existence of evidence, not with its weight." *State v. Phillips,* 416 S.C. 184, 192, 785 S.E.2d 448, 452 (2016). "When the evidence presented merely raises a suspicion of the accused's guilt, the trial court should not refuse to grant the directed verdict motion." *Id.* "'Suspicion' implies a belief or opinion as to

guilt based upon facts or circumstances which do not amount to proof." *State v. Lollis,* 343 S.C. 580, 584, 541 S.E.2d 254, 256 (2001). "If there is any direct evidence or any substantial circumstantial evidence reasonably tending to prove the guilt of the accused, an appellate court must find the case was properly submitted to the jury." *Id.*

"[T]he lens through which a court considers circumstantial evidence when ruling on a directed verdict motion is distinct from the analysis performed by the jury." *State v. Bennett,* 415 S.C. 232, 236, 781 S.E.2d 352, 354 (2016). "The jury's focus is on determining whether every circumstance relied on by the State is proven beyond a reasonable doubt, and that all of the circumstances be consistent with each other and, taken together, point conclusively to the guilt of the accused to the exclusion of every other reasonable hypothesis." *Phillips*, 416 S.C. at 193, 785 S.E.2d at 452. The trial court must view the evidence in the light most favorable to the State when ruling on a motion for directed verdict, and must submit the case to the jury if there is any substantial evidence which reasonably tends to prove the guilt of the accused, or from which his guilt may be fairly and logically deduced. *Id.*; *State v. Littlejohn*, 228 S.C. 324, 329, 89 S.E.2d 924, 926 (1955)). While "the jury must consider alternative hypotheses, the court must concern itself solely with the existence or non-existence of evidence from which a jury could reasonably infer guilt." *Bennett*, 415 S.C. at 237, 781 S.E.2d at 354.

In the present case, the evidence presented to the jury failed to establish the Respondent's case against Appellant for ABHAN. There were numerous holes in the State's case against Appellant. Further, there was ample evidence that the actual altercation which lead to Mr. Richardson's arrest and indictment was much greater in scope than was investigated by law enforcement on the evening of August 22$^{nd}$ and afterwards. The lack of substantial, concrete evidence did not support submitting this case to the jury and the Trial Court erred in failing to

grant the Appellant's Motion for a Directed Verdict.

## CONCLUSION

For the reasons set forth above, Indictment 2023-GS-32-04011 should have been dismissed by the Trial Court due to the fact that it was erroneous on its face. Failure to strike this Indictment allowed evidence of a charge that was highly prejudicial to be heard by the jury. Further, there was insubstantial direct evidence upon which Appellant Ivy Tyrone Richardson's case should have been submitted to the jury. The Trial Judge erred as a matter of law in failing to grant Appellant's Motion for a Directed Verdict and as a result Appellant's conviction should be reversed by this Court.

Respectfully submitted,

____s/S. Jahue Moore__________

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