

**RECEIVED**

**Jun 08 2026**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

---

Appeal from Chesterfield County

Honorable Robert E. Hood, Circuit Court Judge

---

THE STATE,

RESPONDENT,

V.

EMANUEL AUROMOND BEDFORD,

APPELLANT

APPELLATE CASE NO. 2025-001286

---

INITIAL BRIEF OF APPELLANT

---

KATHRINE H. HUDGINS  
Senior Appellate Defender

South Carolina Commission on Indigent Defense  
Division of Appellate Defense  
PO Box 11589  
Columbia, SC 29211-1589  
(803) 734-1330

ATTORNEY FOR APPELLANT

**TABLE OF CONTENTS**

TABLE OF CONTENTS.....i

TABLE OF AUTHORITIES ..... ii

STATEMENT OF ISSUE ON APPEAL.....1

STATEMENT OF THE CASE .....2

STANDARD OF REVIEW .....3

STATEMENT OF FACTS .....4

ARGUMENT

**In this murder and grand larceny prosecution, tried in  
Chesterfield County, the trial judge erred in refusing to direct  
a verdict of acquittal when a body has not been recovered and  
the State failed to present any evidence that the offenses  
charged were committed in Chesterfield County. ....8**

CONCLUSION.....15

## TABLE OF AUTHORITIES

### Cases

<u>State v. Crocker</u> , 366 S.C. 394, 621 S.E.2d 890 (Ct. App. 2005).....	10, 11
<u>State v. Evans</u> , 307 S.C. 477, 415 S.E.2d 816 (1992) .....	10
<u>State v. Gasque</u> , 241 S.C. 316, 128 S.E.2d 154 (1962) .....	11
<u>State v. Gentry</u> , 363 S.C. 93, 610 S.E.2d 494 (2005).....	10
<u>State v. Gethers</u> , 269 S.C. 105, 236 S.E.2d 419 (1977).....	12
<u>State v. Hightower</u> , 221 S.C. 91, 69 S.E.2d 363 (1952) .....	11
<u>State v. McLeod</u> , 303 S.C. 420, 401 S.E.2d 175 (1991), overruled by <u>State v. Evans</u> , 307 S.C. 477, 415 S.E.2d 816 (1992) .....	11
<u>State v. Owens</u> , 293 S.C. 161, 359 S.E.2d 275, (1987).....	12
<u>State v. Wells</u> , 249 S.C. 249, 153 S.E.2d 904 (1967).....	11
<u>State v. Weston</u> , 367 S.C. 279, 625 S.E.2d 641 (2006).....	3
<u>State v. Williams</u> , 321 S.C. 327, 468 S.E.2d 626 (1996).....	10, 11
<u>United States v. Rees</u> , 193 F.Supp. 849 (D.Md.1961).....	11
<u>Wray v. State</u> , 288 S.C. 474, 343 S.E.2d 617 (1986) .....	12

### Statutes

S.C. Code §44-53-370(e)(1)(a)(1) .....	10
--	----

**STATEMENT OF ISSUE ON APPEAL**

In this murder and grand larceny prosecution, tried in Chesterfield County, did the trial judge err in refusing to direct a verdict of acquittal when a body has not been recovered and the State failed to present any evidence that the offenses charged were committed in Chesterfield County?

## STATEMENT OF THE CASE

In March of 2022, the Chesterfield County Grand Jury indicted Appellant, Emanuel Auromond Bedford, for murder and grand larceny, indictments #2021-GS-13-1823, 2022-GS-13-0192. (R. p. \*\*). On June 13, 2025, Appellant appeared before the Honorable Robert E. Hood for pre-trial hearings. Geoffrey M. Dunn initially represented Appellant. Kernard E. Redmond and David Baxley prosecuted the case. The jury trial started on June 16, 2025, before Judge Hood. On June 17, 2025, Appellant moved to represent himself but then changed his mind. (Tr. pp. 203-221). Later that day Appellant again moved to represent himself and Judge Hood granted the motion. (Tr. p. 277, line 14 – p. 278, 279, 280, lines 1-23). The jury found Appellant guilty as indicted. Judge Hood sentenced Appellant to life without parole for murder and five (5) years concurrent for grand larceny. A timely notice of intent to appeal was served on June 20, 2025. This appeal follows.

### **STANDARD OF REVIEW**

On appeal from the denial of a directed verdict, an appellate court views all facts in the light most favorable to the nonmoving party. State v. Weston, 367 S.C. 279, 292, 625 S.E.2d 641, 648 (2006). “When ruling on a motion for a directed verdict, the trial court is concerned with the existence or nonexistence of evidence, not its weight.” Id.

## STATEMENT OF FACTS

Deidre Reid is the mother of Appellant's son. On August 30, 2021, Appellant traveled by bus from Augusta, Georgia, where Appellant lived, to Charlotte, North Carolina to visit his son who lived with Deidre Reid and her twin daughters in Pageland, South Carolina. (Tr. p. 257, lines 17-20). Deidre Reid and one of her daughters picked Appellant up at the bus station in Charlotte and Appellant stayed with them until September 3, 2021. (Tr. p. 662, line 10- p. 663, lines 1-8). Deidre Reid's daughter testified that on September 3, 2021, her mother told her she was going to drop Appellant off at the bus station, return home and pay their phone bills. The daughter testified that her mother and Appellant left for the bus station in her mother's Chevy Tahoe. (Tr. p. 663, lines 14-25). Deidre Reid did not return home. No one has seen or heard from Deidre Reid since September 3, 2021.

On September 5, 2021, a Chevy Tahoe was pulled from a pond in Beech Island in Aiken County South Carolina. (Tr. pp. 397-401). A deputy from the Aiken County Sheriff's office ran the VIN number and dispatch advised there were no "hits." (Tr. p. 401, line 23 – p. 402, lines 1-8). The Tahoe was towed back to the tow truck company lot. (Tr. p. 402, lines 9-13). According to Captain Shane Whitley with the Pageland Police Department, the Tahoe was found eleven miles or eighteen minutes from Appellant's residence in Augusta, Georgia. (Tr. p. 298, lines 4-11).

Lieutenant Marcia Miller with the Pageland Police Department testified that on September 6, 2021, Appellant called her on the phone and provided the events of the day Deidre Reid went missing. (Tr. p. 184, line 8 – p. 185, lines 1-19). Appellant asked about his son and indicated that he wanted to return to Pageland, speak with officers to clear up any questions, and help the family search for Deidre Reid. (Tr. p. 185, line 19- p. 186, lines 1-2). Lieutenant Miller

testified that Appellant gave her two phone numbers of phones he left with Deidre Reid. One of the numbers ended in 2060 and was used for contact. The other phone ended in 4093 and was for his son to access Wi-fi. (Tr. p. 187, lines 1-8). The lieutenant obtained an exigent request for those cell phone records. (Tr. p. 187, lines 20-25). She also obtained a search warrant for the phone number Appellant called her from ending in 5256. (Tr. p. 188, lines 19-24).

Captain Whitley testified that on September 7, 2021, Appellant called him. (Tr. p. 257, lines 1-6). Captain Whitley testified Appellant explained that on September 3, 2021, he and Deidre Reid left Pageland about 12:30 to 12:40, and arrived at the Greyhound bus station in Charlotte, North Carolina at 1:50. (Tr. p. 257, lines 21-25). Appellant told Captain Whitley that he missed the first bus back to Augusta and had to pay extra for the later 9:00 PM bus. (Tr. p. 258, lines 1-3). Captain Whitley testified, “He stated that should be on camera of him getting out of the passenger seat and that Deidre did not get out of the vehicle. He stated they left the bus station and went riding around. He said one of the tires was going flat, and they stopped by a gas station to pump it up.” (Tr. p. 258, lines 3-8). State’s exhibit #73 shows the Tahoe at the bus station, shows Appellant, wearing a white shirt, get out of the passenger side of the Tahoe, go in the bus station, and then get back in the passenger side of the Tahoe. (Tr. p. 287, line 4 – p. 288, lines 1-17). The captain testified that the video from the bus station could not be enhanced to show if Deidre Reid was driving the Tahoe. (Tr. p. 268, lines 7-19).

According to Captain Whitley Appellant told him, after they left the bus station, he went to get a haircut but there were too many people waiting, so they left and got chicken at a restaurant with a drive through. (Tr. p. 258, lines 9-19). Captain Whitley then testified, “He stated she dropped him back off at the bus station between 8:45 p.m. and 8:55 p.m., and he was on the bus by 9 p.m. and left.” (Tr. p. 258, lines 19-21). The captain testified that video footage

failed to show the Tahoe returning to the bus station in Charlotte, North Carolina. (Tr. p. 288, line 20 – p. 289, lines 1-18). According to the captain, Appellant told him he got home at 2:20 a.m. on September 4, 2021. (Tr. p. 260, lines 2-3).

On September 7, 2021, Captain Whitley requested assistance from the Union County Sheriff's Office in Monroe, North Carolina, with the use of Flock camera license plate readers to locate the Tahoe. (Tr. p. 262, lines 15-18; p. 239, line 7- p. 240, lines 1-8). The Flock camera captured a video of the Tahoe on September 3, 2021, at 3:39 p.m. at the Flying J in York County, South Carolina. (Tr. p. 241, lines 1-7). Captain Whitley testified that Appellant is seen on the video getting out of the driver's side of the Tahoe at the Flying J, going inside, buying two beers and cigarettes and then leaving. (Tr. p. 290, lines 12-15; p. 292, line 9 – p. 293, lines 1-4). The video shows Appellant wearing a black tank top instead of the white shirt seen on the bus station video. (Tr. p. 290, lines 17-21). Captain Whitley testified that the driver's window was down at the Flying J while it appeared to be up at the bus station. (Tr. p. 291, lines 19 – 24). Captain Whitley admitted that to his knowledge the Tahoe never returned to Chesterfield County. (Tr. p. 349, lines 19-21).

In addition to requesting assistance from law enforcement in North Carolina, Captain Whitley also requested assistance from Investigator Ronald Sylvester with the Richmond County Sheriff's Office in Augusta, Georgia. (Tr. pp. 247-250). According to Investigator Sylvester, he was unable to verify that Appellant got off a bus at the Southeastern Stages Station in Augusta, Georgia. (Tr. p. 249, line 15 – p. 250, lines 1-2). The investigator admitted, however, that he did not view videos from the bus station, but an employee advised he had no record of Appellant arriving in Augusta. (Tr. p. 251, lines 1-14).

On September 24, 2021, Captain Whitley and other law enforcement searched an area in Burke County, Georgia, based on cell phone location information from the phone ending in 2060. (Tr. p. 269, lines 1-10). Law enforcement found a New York Giants license tag that appeared to be the same tag seen on Deidre Reid's car. (Tr. p. 269, lines 14-20). Officers also found pieces of a vehicle bumper. (Tr. p. 270, lines 4-17). Captain Whitley testified that Appellant's uncle lived close to the area where the items were found. (Tr. p. 269, line 21 – p. 270, lines 1-4). Officers with Burke County Georgia collected the items found in their jurisdiction. (Tr. p. 270, lines 15-21). Captain Whitley admitted that they did not know if Deidre Reid went missing in the state of South Carolina. (Tr. p. 349, line 24 – p. 350, lines 1-3).

On December 8, 2021, the Aiken County Sheriff's Office again ran the VIN number of the Chevy Tahoe through NCIC before releasing the vehicle as abandoned to the tow company. (Tr. p. 488, lines 1-14). This time the Tahoe was listed as involved with a missing person from Pageland, South Carolina. (Tr. p. 488, lines 14-17). The Aiken County Sheriff's Office took possession of the Tahoe and obtained a search warrant allowing SLED to process the Tahoe. (Tr. p. 488, line 21 – p. 489, lines 1-24). SLED processed the Tahoe in Aiken. (Tr. p. 546, lines 5-15). The driver's window was broken. (Tr. p. 564, lines 1-5). Areas in the front passenger seat were presumptive positive for blood. (Tr. pp. 553-559). Swabs were taken of the areas that were positive for blood. (Tr. p. 560, lines 14-21). The swabs were analyzed by a forensic DNA analyst with SLED. The analyst testified that Deidre Reid was more likely to have contributed to the stains than two unidentified, unrelated individuals. (Tr. pp. 587-592).

## ARGUMENT

**In this murder and grand larceny prosecution, tried in Chesterfield County, the trial judge erred in refusing to direct a verdict of acquittal when a body has not been recovered and the State failed to present any evidence that the offenses charged were committed in Chesterfield County.**

Prior to trial Appellant challenged venue in Chesterfield County. (Tr. pp. 29-45). Defense counsel characterized the motion as a motion to quash the indictment, challenge venue, and challenge jurisdiction. (Tr. p. 29, lines 14-17). It was uncontested that the missing person, Deidre Reid, lived in Pageland, located in Chesterfield County. (Tr. p. 29, line 24 – p. 30, lines 1-6). It was uncontested that Appellant spent the week with Deidre Reid in Pageland, visiting his son. (Tr. p. 30, lines 7-12). It was uncontested that on September 3, 2021, Deidre Reid took Appellant from her home in Pageland to the bus station in Charlotte, North Carolina. (Tr. p. 30, lines 13-20).

The State conceded that Deidre Reid, was probably not killed in Chesterfield County and admitted there was no evidence that she and Appellant returned to Chesterfield County after she drove Appellant to the bus station in North Carolina. (Tr. p. 41, lines 1-5). The State told the judge, “Of course, we would concede to the jury that we can’t say she was killed in Chesterfield County. As a matter of fact, we would pretty much stipulate that she probably was not killed in Chesterfield County.” (Tr. p. 37, lines 8-12). The State argued “it” started in Chesterfield County and that was the last place they were seen together. (Tr. p. 41, lines 5-8).

Defense counsel argued, “There’s no evidence that there was a crime committed in Chesterfield. They got into a car together with the intention of going to Charlotte to drop him off at the bus station.” (Tr. p. 42, lines 10-13). The trial judge asked, “So my question, Mr. Dunn, is why is this not a directed verdict motion, as opposed to a motion to quash?” (Tr. p. 43, lines 16-

18). Defense counsel answered, “It will be a directed verdict motion as well, next week.” (Tr. p. 43, lines 19-20).

The trial judge denied the motion to quash the indictments and challenge jurisdiction. (Tr. p. 127, line 10 – p. 128, 129, lines 1-19). The judge noted, “Now the State still has to prove the elements of the offense and that the elements of the offense have some connection to Chesterfield County.” (Tr. p. 129, lines 12-14). The judge also noted that Appellant could renew the motion at the directed verdict stage. (Tr. p. 129, lines 15-19).

At the close of the State’s case Appellant, now representing himself, moved for a directed verdict. The trial judge asked, “And so we come to the issue of – I assume you’re also moving for a directed verdict. Is that correct?” (Tr. p. 672, lines 20-21). Appellant answered, “That’s correct, Your Honor.” (Tr. p. 672, line 22). The State argued that leaving Chesterfield County together in the Tahoe was sufficient to survive the directed verdict motion based on venue. (Tr. p. 672, line 25 – p. 673, lines 1-25). The trial judge responded, “Okay. You’re going to have to give me more than that.” (Tr. p. 674, lines 2-3). The trial judge then went over the evidence presented by the State. (Tr. pp. 674-678). The judge noted, “There’s no – there’s no – him getting in a car with her voluntarily is not a crime.” (Tr. p. 679, lines 16-17). The State argued that getting in the car together in Chesterfield County was an act material to murder sufficient for venue in Chesterfield County. (Tr. p. 679, line 18 – p. 680, 681, 682, lines 1-3).

The judge denied the motion for directed verdict finding venue proper in Chesterfield County stating:

So the issue becomes whether or not the venue is properly laid here in Chesterfield [C]ounty. Based upon the law in State v. Crocker, which is quoting State v. Williams, South Carolina Supreme Court case in 1996, there are acts that are material to the offense that have occurred, in the light most favorable to the State in Chesterfield County and some in another: potentially Charlotte, potentially York, potentially Aiken, particular – potentially Georgia.

And, therefore, venue is proper in either county. And I will find that the venue is proper. And there has been substantial circumstantial evidence as to the issue of venue being proper here in Chesterfield County. And I will deny the defense's motion for a directed verdict.

(Tr. p. 686, lines 7-19).

The trial judge erred. The State failed to present any evidence that getting in the Tahoe together in Chesterfield County was an act material to murder or grand larceny. The trial judge erred in refusing to direct a verdict of acquittal when the State failed to present any evidence that the offenses charged were committed in Chesterfield County.

In State v. Crocker, 366 S.C. 394, 404, 621 S.E.2d 890, 895 (Ct. App. 2005), the South Carolina Court of Appeals wrote:

As noted, venue principles entitle a criminal defendant "to a directed verdict when the State fails to present evidence that the offense was committed in the county alleged in the indictment." State v. Evans, 307 S.C. 477, 480, 415 S.E.2d 816, 818 (1992), overruled in part on other grounds by State v. Gentry, 363 S.C. 93, 610 S.E.2d 494 (2005). The standard for establishing venue is not a stringent one, for "venue, like jurisdiction, in a criminal case need not be affirmatively proved, and circumstantial evidence of venue, though slight, is sufficient...." State v. Williams, 321 S.C. 327, 334, 468 S.E.2d 626, 630 (1996). "[W]here some acts material to the offense ... occur in one county, and some in another, venue is proper in either county." Id.

In State v. Crocker, Crocker was convicted, in Richland County, of murder and trafficking in marijuana in violation of S.C. Code §44-53-370(e)(1)(a)(1). Only the trafficking charge was challenged on direct appeal. The Court noted, "One manner in which the State may establish the substantive offense of trafficking in marijuana under this section is to prove that the defendant 'conspire[d] to sell' ten or more pounds of marijuana. Section 44-53-370(e)(1)." Crocker, 366 S.C. at 404, 621 S.E.2d at 895. The State presented evidence of an agreement for the sale of marijuana that formed in Dillon County, but the purported sale was to take place in Richland County. The parties arrived in Richland County and instead of a marijuana transaction,

a shooting took place. No marijuana was recovered in Richland County. The Court found venue proper in Richland County noting:

“Venue of a prosecution for conspiracy may be laid in either the county in which the agreement was entered, or in any county in which an overt act was done by any of the conspirators in furtherance of their common design.” State v. Wells, 249 S.C. 249, 259, 153 S.E.2d 904, 909 (1967); see also State v. Hightower, 221 S.C. 91, 97–98, 69 S.E.2d 363, 366 (1952) (noting that “[t]he rule is generally recognized that if the overt act is committed within the court’s jurisdiction, the place of the conspiracy is immaterial”).

Crocker, 366 S.C. at 405, 621 S.E.2d at 896.

The trial judge’s reliance on Crocker is misplaced. The present case does not involve a conspiracy theory. The State presented no evidence of a conspiracy forming in Chesterfield County or anywhere else. The State presented no evidence of an overt act in furtherance of a conspiracy to commit murder and grand larceny taking place in Chesterfield County. Getting in the Tahoe together in Chesterfield County, without more, is not an overt act and is not sufficient to establish venue in Chesterfield County.

In State v. Williams, 321 S.C. 327, 334, 468 S.E.2d 626, 630 (1996), the South Carolina Supreme Court wrote, “Generally, it can be inferred that the crime was committed in the state as well as county where the body is found. United States v. Rees, 193 F.Supp. 849 (D.Md.1961). Furthermore, where some acts material to the offense, and requisite to its consummation, occur in one county, and some in another, venue is proper in either county. State v. McLeod, *supra*; State v. Gasque, 241 S.C. 316, 128 S.E.2d 154 (1962).”

In State v. Williams, Williams was tried for the murder of his wife and son in Edgefield County where their bodies were discovered inside the family van. The family lived in Augusta, Georgia approximately six miles from where the bodies were found. In finding Williams was not entitled to a directed verdict based on venue the Court wrote:

Although there is evidence that some of the acts material to the homicides may have been committed in Georgia, the deaths occurred sometime between the time the victims were last seen in Georgia and the time the fire started in the van in South Carolina. Because both bodies were found in Edgefield County, we conclude there was sufficient evidence from which a trier of fact could reasonably infer that the victims died there. Moreover, Williams signed insurance documents conceding that Wife and Son died in Edgefield County. Accordingly, we find that there was sufficient circumstantial evidence, although not conclusive, to support the inference that the victims died in Edgefield County, South Carolina, and Williams was not entitled to a directed verdict.

Williams, 321 S.C. at 334, 468 S.E.2d at 630.

The trial judge's reliance on Williams is misplaced. In the present case a body has not been found in Chesterfield County, or anywhere else. The State presented no evidence that acts material to the offense, and requisite to its consummation took place in Chesterfield County. Getting in the Tahoe together in Chesterfield County, without more, is not an act material to murder or grand larceny and requisite to its consummation.

In State v. Owens, 293 S.C. 161, 359 S.E.2d 275, (1987), Owens was tried for the murder of Ernest Vereen in Horry County. The body was never found. In finding venue proper in Horry County the South Carolina Supreme Court wrote, "Venue in a criminal case need not be affirmatively proved if there is sufficient evidence from which it can be inferred. Wray v. State, 288 S.C. 474, 343 S.E.2d 617 (1986); State v. Gethers, 269 S.C. 105, 236 S.E.2d 419 (1977). The facts here indicate the victim was last seen at his residence in Horry County where there were found signs of a struggle. The ransom money was demanded and delivered in Horry County. This evidence is sufficient to establish venue in Horry County." Owens, 293 S.C. at 166, 359 S.E.2d at 277-78.

In contrast, in the present case the State presented no evidence from which it could be inferred a crime took place in Chesterfield County. There were no signs of a struggle in Chesterfield County. While DNA evidence was found in the Tahoe, recovered in a pond in

Aiken County, the State presented no evidence of where, or when, or even how that DNA evidence came to be in the Tahoe. As the trial judge correctly noted, “But there’s no massive pooling of blood anywhere in the vehicle, in the back and where somebody – you know, where there was a body for some period of time that had a massive bleed out.” (Tr. p. 677, lines 16-19).

The trial judge noted in denying the motion for a directed verdict based on venue, that acts material to the offense may have taken place in Charlotte, North Carolina, York County, South Carolina, Aiken County, South Carolina, and Georgia. (Tr. p. 686, lines 13-14). The judge erred in finding the State proved acts material to the charges took place in chesterfield County. Deidre Reid’s daughter testified that on September 3, 2021, her mother and Appellant left for the bus station in her mother’s Chevy Tahoe. (Tr. p. 663, lines 2-25). State’s exhibit #73 shows the Tahoe at the bus station in Charlotte on September 3, 2021. The video shows Appellant get out of the passenger side, go in the bus station, and then get back in the passenger side of the Tahoe. (Tr. p. 287, line 4 – p. 288, lines 1-17).


The Flock camera captured a video of the Tahoe on September 3, 2021, at 3:39 p.m. at the Flying J in York County, South Carolina. (Tr. p. 241, lines 1-7). Captain Whitley of the Pageland Police Department testified that Appellant is seen on the video getting out of the driver’s side of the Tahoe at the Flying J, wearing a different shirt, going inside, buying two beers and cigarettes and then leaving. (Tr. p. 290, lines 12-15; p. 292, line 9 – p. 293, lines 1-4). On September 5, 2021, the Chevy Tahoe was pulled from a pond in Beech Island in Aiken County, South Carolina. (Tr. pp. 397-401). On September 24, 2021, Captain Whitley and other law enforcement searched an area in Burke County, Georgia, based on cell phone location information from the phone ending in 2060. (Tr. p. 269, lines 1-10). At trial Lieutenant Miller

with the Pageland Police Department testified Appellant told her that he left the phone ending in 2060 with Deidre Reid. (Tr. p. 187, lines 1-5). Law enforcement found a New York Giants license tag that appeared to be the same tag seen on Deidre Reid's car. (Tr. p. 269, lines 14-20). Officers also found pieces of a vehicle bumper. (Tr. p. 270, lines 4-17).

Reid was last seen in Chesterfield County, South Carolina, driving Appellant to the bus station in Charlotte, North Carolina. This is not an act material to murder or grand larceny, and requisite to its consummation sufficient to make venue in Chesterfield County proper. The State presented no evidence of an argument starting in Chesterfield County. The State presented no evidence of any plan to lure Reid out of Chesterfield County. The State failed to show that any acts material to the charges took place in Chesterfield County. The trial judge erred in refusing to direct a verdict of acquittal on both charges.

CONCLUSION

Based on the above argument this Court should reverse the convictions and remand the case for an order directing a verdict of acquittal for murder and grand larceny.

  
\_\_\_\_\_  
Kathrine H. Hudgins  
Senior Appellate Defender

ATTORNEY FOR APPELLANT

This 8<sup>th</sup> day of June, 2026.

**RECEIVED**  
**Jun 08 2026**  
**SC Court of Appeals**