THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS

ALISON RENEE LEE, CHIEF ADMINISTRATIVE JUDGE

CASE NO.: 2013-CP-40-4121

HAMID DEMMIRIO, ...PETITIONER,

VS.

STATE OF SOUTH CAROLINA, ...RESPONDENT.

NOTICE OF APPEAL & PETITION FOR WRIT OF CERTIORARI

MR. HAMID DEMMIRIO #115800
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TABLE OF CITED AUTHORITIES

LAW AND ANALYSIS

DID THE PCR COURT ERRED BY SUMMARILY DISMISSING APPLICANT'S INITIAL PCR APPLICATION WHICH ASSERTED VALID CLAIMS TO WARRANT AN EVIDENTIARY HEARING ON APPLICANT'S RIGHT TO APPEAL AND/OR APPELLATE REVIEW? 3.

DID THE PCR COURT ERRED BY NOT RULING ON APPLICANT'S BRADY V. MARYLAND CLAIM? 5.

DID THE PCR COURT ERRED BY NOT CONDUCTING A HEARING ON APPLICANT'S INITIAL PCR TO FIND OUT WHETHER OR NOT IF THERE WHERE AN INEFFECTIVE ASSISTANCE CLAIM? 6.

DID THE PCR COURT ERRED BY VIOLATING APPLICANT'S DUE PROCESS BY NEVER RULING ON APPLICANT'S UNINTELLIGENT, INVOLUNTARY, AND UNKNOWING GUILTY PLEA? 7.

HAS THE PETITIONER ESTABLISHED AN ACTUAL INNOCENCE CLAIM? 8.

STATEMENT OF CASE

PETITIONER, HAMID DEMMIRIO, WAS ARRESTED AND CHARGED WITH MURDER AND ARMED ROBBERY (87-GS-40-3393) AND (87-GS-40-3394) ON AUGUST 7, 1987. PETETIONER WAS INDICTED AT THE SEPTEMBER 17, 1987 TERM OF THE RICHLAND COUNTY GRAND JURY SESSION. PETITIONER WAS INITIALLY APPOINTED MR. DOUGLAS S. STRICKLER, ESQ. AND MR. NAT ROBERSON, ESQ. FROM RICHLAND COUNTY PUBLIC DEFENDERS OFFICE. ON MAY 1, 1988, MR. STRICKLER WAS RELIEVED AS CO-COUNSEL TO IRRECONCILABLE DIFFERENCE / CONFLICT OF INTEREST.

ON MAY 4, 1988, JUDGE RALPH KING ANDERSON, JR. ASSIGNED MS. JOY SCHERFFIUS GOODWIN, ESQ. AND MR. JOHNTHAN PETER POPOWSKI, ESQ. TO REPRESENT PETITIONER. ON MAY 5, 1988, MS. GOODWIN MOTIONED FOR A CONTINUANCE ON THE GROUND THAT SHE WAS NEWLY APPOINTED AND THAT SHE NEEDED TIME TO FAMILIARIZE HERSELF WITH THE CASE AND THAT SHE HAD SEVERAL OTHER LEGAL MATTERS PENDING AS WELL AS PERSONAL MATTERS. SEE EXHIBIT (D).

PETITIONER THEREAFTER ON JULY 18, 1988 ENTERED A GUILTY PLEA PURSUANT TO A NEGOTIATED ALFORE V. NORTH CAROLINA, 400 U.S. 25, 91 S.Ct. 160 (1970). ON NOVEMBER 3, 2003, PETITIONER FILED A PRO SE PCR AND MS. MELISSA JANE REED KIMBROUGH, ESQ. WAS APPOINTED TWO (2) WEEKS LATER. MS. KIMBROUGH WOULD NOT RESPOND TO ANY OF CORRESPONDENCE. SEE EXHIBIT (H). ON MARCH 1, 2004, PETITIONER WROTE TO THE HONORABLE THOMAS G. COOPER, JR. CONCERNING MS. KIMBROUGH'S REPRESENTATION OF ME. SEE EXHIBIT ( ).

ARGUMENT ONE

THE PCR JUDGE ERRED IN SUMMARILY DISMISSING PETITIONER'S APPLICATION FOR POST-CONVICTION RELIEF UNDER S.C. CODE § 17-27-45 (A). PURSUANT TO THIS STATUTE, AN APPLICATION FOR PCR MUST BE FILED WITHIN ONE YEAR AFTER THE ENTRY OF A JUDGMENT OF CONVICTION OR WITHIN ONE YEAR AFTER THE SENDING OF REMITTITUR TO THE LOWER COURT FROM AN APPEAL OR FILING OF THE FINAL DECISION UPON AN APPEAL, WHICHEVER IS LATER. PETITIONER ASSERTS THAT THE PCR COURT ERRED BY SUMMARILY DISMISSING HIS FIRST PCR APPLICATION WHICH ASSERTED VALID CLAIMS TO WARRANTS AN EVIDENTIARY HEARING ON APPLICANT'S STATES RIGHT TO APPELLATE REVIEW PURSUANT TO AUSTIN V. STATE, 305 S.C. 453, 409 S.E.2d 395 (1991); SCACR 243 PCR RULES, AN APPLICANT IS ENTITLED TO A FULL ADJUDICATION ON THE MERITS OF THE ORIGINAL PETITION, OR "ONE BITE AT THE APPLE". AICE V. STATE, 305 S.C. 448, 452, 409 S.E.2d 392, 395 (1991). THIS BITE INCLUDES AN APPLICANT'S RIGHT TO APPEAL THE DENIAL OF A PCR APPLICATION, AND THE RIGHT TO ASSISTANCE OF COUNSEL IN THAT APPEAL, WHICH THE APPLICANT NEVER EVER RECEIVED.

RELEVANT FACTS

PETITIONER WAS SENTENCED BY RALPH KING ANDERSON, JR. TO LIFE WITHOUT PAROLE. SEE SENTENCING SHEETS EXHIBIT (G). THE HONORABLE J. ERNEST KINARD, JR. DISMISSED PETITIONER'S PCR APPLICATION. ON JANUARY 26, 2006, CONDITIONAL ORDER OF DISMISSAL (03-CP-40-5340) SEE EXHIBIT (A'). ON OCTOBER 24, 2005, PETITIONER FILED A PRO SE MOTION FOR TRANSCRIPT RECONSTRUCTION, THERE WAS NEVER A RULING. SEE EXHIBIT (F). ON MAY 13, 2006, THE HONORABLE KINARD ISSUED THE FINAL ORDER OF DISMISSAL, SEE EXHIBIT (B) AND DENIED PETITIONER'S PCR APPLICATION FINDING THAT THE PRESIDING JUDGE, THE LATE HONORABLE FRANK EPPES WAS DECEASED AND THAT THE HONORABLE EPPES TESTIMONY WOULD BE KEY TO RECONSTRUCTING THE RECORD OF THE GUILTY PLEA, AND THAT THE ABSENCE OF THIS TESTIMONY IS PREJUDICIAL TO THE RESPONDENT AND APPLICANT. *PLEASE KEEP IN MIND THAT THE HONORABLE EPPES NEVER HAD ANYTHING TO DO WITH ANY OF PETITIONER'S JUDICIAL AND JUDICIARY PROCEEDINGS*.

THE PETITIONER HAS NEVER RECEIVED A COMPLETE "BITE AT THE APPLE" BECAUSE HIS INITIAL PCR APPLICATION WERE SUMMARILY DISMISSED ON MAY 18, 2006 DUE TO COUNSEL'S ABANDONMENT OR WITHDRAWAL. THE COURT MUST BE CONCERNED WITH THE WILLFUL AND UNILATERAL ABANDONMENT OF THE PETITIONER BY COUNSEL GRAHAM V. TOWN OF LORIS, 272 S.C. 442 AT 452, 248 S.E.2d 594 (1978). THERE IS AUTHORITY FOR THE PROPOSITION THAT THE GENERAL RULE IS NOT APPLIED TO SUCH A FACTUAL SITUATION. THE EXCEPTION TO THE GENERAL RULE IS EXPRESSED AT 46 AM. JUR. 2d JUDGMENTS 737 (1969) IN THE FOLLOWING LANGUAGE:

"THE RULE THAT AN ATTORNEY'S NEGLIGENCE MAY BE IMPUTED TO HIS CLIENT AND PREVENT THE LATTER FROM RELYING ON THAT GROUND FOR OPENING OR VACATING A JUDGMENT DOES NOT NECESSARILY PREVAIL IN THE EVENT OF THE ATTORNEY'S ABANDONMENT OR WITHDRAWAL FROM THE CASE". AN APPLICANT HAS A RIGHT TO AN APPELLATE COUNSEL ASSISTANCE IN SEEKING REVIEW OF THE DENIAL OF PCR PURSUANT TO AUSTIN V. STATE, 305 S.C. 453, AT 454, 409 S.E.2d 395 AT 396; RULE 71.1(G), SCRCP, UNDER PCR RULES. A COURT WILL APPOINT AN ATTORNEY TO A PCR APPLICANT IF: (1) AN EVIDENTIARY HEARING IS REQUIRED, WHICH ONE WAS REQUESTED. SEE THE STATES RETURN EXHIBIT (E); OR (2) THE APPLICANT IS INDIGENT AND WANTS TO FILE AN APPEAL. SEE WHITEHEAD V. STATE, 310 S.C. 532, 426 S.E.2d 315 (1992).

PETITIONER FILED HIS PCR WITHOUT THE BENEFIT OF COUNSEL. IN THE STATES RETURN, THE STATE REQUESTED AN EVIDENTIARY HEARING ON THE ISSUE OF SUBJECT MATTER JURISDICTION. SEE EXHIBIT (E). THE RECORD DOES NOT REFLECT THAT PETITIONER WAS ADVISED OF HIS RIGHT TO APPEAL OR THE STATUTE OF LIMITATION FOR FILING AN APPEAL. THE PCR COURT'S FAILURE TO ADVISE PETITIONER OF HIS RIGHT TO APPEAL THE SUMMARILY DISMISSAL OF PRO SE PCR DENIED THE PETITIONER HIS ONE FULL "BITE" OF THE APPLE AND DUE PROCESS OF LAW. S.C. CONST. ART. 1, §3.

ARGUMENT TWO

THE PCR COURT ERRED BY NEVER CANVASSING, DELVING, NOR ADDRESSING APPLICANT'S AFTER/NEWLY DISCOVERED EVIDENCE ASSERTION. IN QUESTIONING ARE THE THREE (3) BOXES OF DOCUMENTS AND REPORTS WHICH S.C. LAW ENFORCEMENT DIVISION HAVE IN THEIR POSSESSION, CARE, AND CONTROL THAT TRIAL COUNSELS, PCR COUNSEL, NOR PETITIONER **NEVER** VIEWED NOR KNEW TO HAVE EXISTED. THESE DOCUMENTS WAS REQUESTED THROUGH MOTION BY COUNSEL IN 1988 AND THE STATE FAILED THE BRADY AND RULE 5 MOTION EVIDENCE SETTING FORTH A BRADY V. MARYLAND, 373 U.S. 83, 83 S.Ct. 1194 (1963) VIOLATION.

THE STATE MAY HAVE INADVERTENTLY LEFT BRADY/RULE 5 DOCUMENTS OUT AND THE STATE DID NOT DISCLOSED ANY OR CERTAIN DOCUMENTS AND IT CAME UPON PETITIONER'S ATTENTION ON APRIL 8, 2011, UPON HIS WRITING SLED. SEE EXHIBIT (C). PETITIONER ASSERTS THAT, EVEN IF BY ACCIDENT, WITHHOLDING OF SUCH MATERIALS; STATEMENTS, NOTES, LETTERS, PHOTOGRAPHS, ETC. RENDER APPLICANT'S GUILTY PLEA UNKNOWING AND INVOLUNTARY. THE UNITED SUPREME COURT SUBSEQUENTLY EXTENDED BRADY DISCLOSURE RULE TO MATERIAL IMPEACHMENT EVIDENCE UNDER GIGLIO V. UNITED STATES, 405 U.S. 150, 154-55, 92 S.Ct. 763 (1972) AND JETTISON ANY REQUIREMENTS THAT A DEFENDANT MUST REQUEST EXCULPATORY MATERIAL EVIDENCE IN ORDER TO BE ENTITLED TO ITS DISCLOSURE UNITED STATES V. AGURS, 427 U.S. 97, 107, 96 S.Ct. 2392 (1976).

IN THIS RARE AND UNIQUE CASE, THE APPLICANT HAS APODITICLY SHOWN THAT SLED AND THE STATE HAVE FAILED TO DISCLOSE OF THESE DOCUMENTS "WHICH HAD BEEN KNOWN TO THE PROSECUTION, BUT UNKNOWN TO THE DEFENSE". EVEN IF THE PROSECUTOR WAS NOT PERSONALLY AWARE OF THE EVIDENCE, THE STATE ISN'T EXEMPT NOR RELIEVED OF ITS DUTY TO DISCLOSURE BECAUSE "THE STATE" INCLUDES, IN ADDITION TO THE PROSECUTOR, OTHER LAWYERS AND EMPLOYEES IN HIS OFFICE AND MEMBERS OF LAW ENFORCEMENT CONNECTED TO THE INVESTIGATION AND PROSECUTION OF THE CASE PURSUANT TO S.C. CODE ANN. § 17-27-20 (A)(3)(4)(6) AND S.C. CODE ANN. § 17-27-45 (C) AND KYLES V. WHITLEY, 514 U.S. 419, 437, 115 S.Ct. 1555 (1995).

BRADY HOLDS THAT A PROSECUTOR VIOLATES DUE PROCESS WHEN HE (1) SUPPRESSES EVIDENCE, (2) THAT THE EVIDENCE IS FAVORABLE TO THE DEFENDANT, WHEN THE EVIDENCE IS MATERIAL TO GUILT OR INNOCENCE. Id. 87, 83 S.Ct. 1194 AND THIS HONORABLE COURT MUST AGREE WITH PETITIONER THAT THESE UNDISCLOSED DOCUMENTS THE STATE HAVE IN THEIR POSSESSION ARE INDEED FAVORABLE TO PETITIONER AND THAT THE STATE HAVE REPEATEDLY VIOLATED PETITIONER'S DUE PROCESS RIGHTS. QUINTESSENTIALLY, EVIDENCE IS MATERIAL UNDER BRADY IF IT CREATES A REASONABLE PROBABILITY OF A DIFFERENT RESULT. KYLES A REASONABLE PROBABILITY DOES NOT MEAN THAT THE DEFENDANT WOULD MORE LIKELY THAN NOT HAVE RECEIVE A DIFFERENT VERDICT WITH THE EVIDENCE ONLY THAT THE LIKELIHOOD OF A DIFFERENT RESULT IS GREAT ENOUGH TO UNDERMINE CONFIDENCE IN THE OUTCOME OF THE TRIAL. SMITH V. CAIN, 132 S.Ct. 627 (2012) (QUOTING) KYLES, AT 434, 115 S.Ct. 1555.

ARGUMENT THREE

PETITIONER ASSERTS THAT THE PCR COURT ERRED BY SUMMARILY DISMISSING HIS FIRST PCR APPLICATION WHICH ASSERTED VALID CLAIMS TO WARRANTS AN EVIDENTIARY HEARING ON APPLICANT'S STATS RIGHT TO APPELLATE REVIEW PURSUANT TO AUSTIN V. STATE, 305 S.C. 453, 409 S.E.2d 395 (1991); SCACR 243 PCR RULES, AN APPLICANT IS ENTITLED TO A FULL ADJUDICATION ON THE MERITS OF THE ORIGINAL PETITION, OR "ONE BITE AT THE APPLE". AICE V. STATE, 305 S.C. 448, 452, 409 S.E.2d 392, 395 (1991). THIS BITE INCLUDES AN APPLICANT'S RIGHT TO APPEAL THE DENIAL OF A PCR APPLICATION, AND THE RIGHT TO ASSISTANCE OF COUNSEL IN THAT APPEAL, WHICH THE APPLICANT NEVER EVER RECEIVED.

ARGUMENT FOUR

THE LOWER COURT CONTINUES TO ARGUE BY SAYING THAT THE PETITIONER IS PROCEDURALLY BARRED. ALTHOUGH ONE MAY REACH THIS RESULT UNDER A HYPER-TECHNICAL ANALYSIS, SUCH A CONCLUSION SHOULD AND MUST BE REJECTED AS WELL IN THIS CASE BECAUSE OF SO MANY IRREGULARITIES OCCURRED DURING AND SURROUNDING THE COURSE OF ALL THE PETITIONER'S JUDICIAL PROCEEDINGS.

EVEN IF PETITIONER'S PCR APPLICATION IS SUCCESSIVE, WHICH THIS HONORABLE COURT SHOULD FEEL THAT IT ISN'T CONSIDERING THAT THE APPLICANT HASN'T HAD A BITE AT THE APPLE. THE UNIQUE COMBINATION OF THESE UNEQUIVOCAL FACTS IS THAT PETITIONER HAVE ASSERTED ENTITLES HIM TO RELIEF! CASE V. STATE, 277 S.C. 474, 289 S.E.2d 413 (1982) AND THAT SUCCESSIVE PCR APPLICATIONS HAVE BEEN GRANTED IN CASES INVOLVING UNIQUE FACTUAL CIRCUMSTANCES; SUCH AS THIS CASE AT BAR. TILLEY V. STATE, 334 S.C. 24, 511 S.E.2d 689 (1999); CARTER V. STATE, 293 S.C. 528, 362 S.E.2d 20 (1987).

ARGUMENT FIVE

THE LOWER COURT FAILED TO COMPORT WITH BOYKIN V. ALABAMA, 395 U.S. 238 (1969); RODDY V. STATE, 339 S.C. 29, 33, 528 S.E.2d 418, 421 (2000) WHEN IT COMES TO FINDING OUT WHETHER IF A DEFENDANT'S GUILTY PLEA WAS KNOWINGLY AND VOLUNTARY ENTERED. THE RECORD MUST ESTABLISH THAT THE DEFENDANT HAD A FULL AND COMPLETE UNDERSTANDING OF THE IMPORTANCE AND CONSEQUENCES SURROUNDING THE PLEA.

THE VOLUNTARINESS OF THE GUILTY PLEA ISN'T DETERMINED BY AN EXAMINATION OF A SPECIFIC INQUIRY MADE BY THE SENTENCING COURT ALONE, BUT IS DETERMINED AND SETTLED FROM BOTH THE TRIAL RECORD MADE AT THE TIME OF THE GUILTY PLEA, AND ALSO FROM THE RECORD OF THE PCR PROCEEDING. PITTMAN V. STATE, 337 S.C. 597, 600-01, 524 S.E.2d 623, 625 (1999). SINCE THERE ISN'T A GUILTY PLEA TRANSCRIPT NOR A PCR TRANSCRIPT OF ANY SORT AVAILABLE TO ANALYZE AND EVALUATE THE UNTENABLE, IMPRUDENT, AND UNINTELLIGENT PLEA, NO COURT CAN FORM ANY RATIONAL

JUDGMENT WITHOUT SUPPORT! ASSUME FACTS MUST BE SUPPORTED BY A CONSIDERABLE QUANTITY OF EVIDENCE WITHIN AND SURROUNDING THE CASE. STATE V. KING, 222 S.C. 108, 71 S.E.2d 793 (1952).

ACTUAL INNOCENCE
ARGUMENT SIX

THE LOWER COURT FAILED TO CONSIDER THESE CONSTITUTIONAL ISSUES. THE APPLICANT PRESENTS AN ACTUAL INNOCENCE CLAIM. HOWEVER, THIS CLAIM MUST SHOW THAT THE EVIDENCE HE IS PRESENTING IS "NEWLY DISCOVERED" OR "NEWLY AVAILABLE" AND THAT SUCH IS AFFIRMATIVE OF HIS INNOCENCE.

THERE ARE TWO(2) TYPES OF ACTUAL INNOCENCE THAT MAY BE RAISED. SCHLUP V. DELO, 513 U.S. 298, 115 S.Ct. 851 (1995); AND HERRERA V. COLLINS, 506 U.S. 390, 113 S.Ct. 853 (1993). A HERRERA-TYPE CLAIM IS A SUBSTANTIVE CLAIM IN WHICH THE APPLICANT ASSERTS A BARE CLAIM OF INNOCENCE BASED SOLELY ON NEWLY DISCOVERED. IN CONTRAST, A SCHLUP-TYPE CLAIM IS A PROCEDURAL CLAIM IN WHICH THE APPLICANT'S CLAIM OF INNOCENCE DOES NOT BY ITSELF PROVIDE A BASIS FOR RELIEF, BUT IS INTERTWINED WITH CONSTITUTIONAL ERROR THAT RENDERS A DEFENDANT'S CONVICTION INVALID. SEE SCHLUP, 513 U.S. AT 315, 115 S.Ct. 851 (1995); MCQUIGGIN V. PERKINS, 133 S.Ct. 1924 (2013)

THIS CASE ISN'T BASED ON A "FREE-STANDING" ACTUAL INNOCENCE CLAIM. THE SUPREME COURT OF UNITED STATES HAVE PERMITTED PETITIONERS TO OVERCOME PROCEDURAL BARRIERS TO RELIEF UNDER THE FUNDAMENTAL MISCARRIAGE OF JUSTICE EXCEPTION, WHICH THE UNITED STATES SUPREME COURT EQUATED WITH A CLAIM OF ACTUAL INNOCENCE. IT HAD PERMITTED PETITIONERS TO BE HEARD ON THE MERITS WHO OTHERWISE WOULD HAVE BEEN BARRED FROM RELIEF BY PROCEDURAL DEFAULTS. THE MCQUIGGIN COURT EXPLAINED THAT, IN THESE AND OTHER SITUATIONS WHERE THE MISCARRIAGE OF JUSTICE EXCEPTION APPLIED. WHILE THIS CASE DIFFERS FROM MANY OTHER ACTUAL INNOCENCE CASES IN WHICH ONE RELY ON A SINGLE PIECE OF EVIDENCE (e.g., DNA EVIDENCE OR THE RECANTATION OF THE ONLY VICTIM OR WITNESS).

THE COURT MUST BELIEVE THAT THE MULTIPLE PIECES OF DOCUMENTS AND NEWLY DISCOVERED EVIDENCE PRESENTED HERE, INCLUDES THE BRADY EVIDENCE) AMOUNT TO AFFIRMATIVE EVIDENCE THAT UNQUESTIONABLY ESTABLISHES APPLICANT'S INNOCENCE. SUCH EVIDENCE AND TERMS HAVE BEEN DEFINED AS EVIDENCE THAT WAS NOT KNOWN TO THE APPLICANT AT THE TIME OF TRIAL, PLEA, OR POST-TRIAL MOTIONS AND COULD NOT BE KNOWN TO HIM EVEN WITH THE EXERCISE OF DUE DILIGENCE. THEREFORE, THE APPLICANT MOVE THIS COURT TO PROCEED BY EXAMINING ALL RELEVANT MATERIALS WOULD BE DOING THE RIGHT THING. DANSBY V. STATE, 2014 TEX. APP. LEXIS 905.

CONCLUSION

FINALITY MUST BE REALIZED AT SOME POINT IN ORDER TO ACHIEVE A SEMBLANCE OF EFFECTIVENESS IN DISPENSING JUSTICE, AND AT SOME JUNCTURE JUDICIAL REVIEW MUST STOP AND RELEASE THIS INNOCENT MAN! WITH ONLY THE VERY RAREST OF EXCEPTIONS, WHEN THE SYSTEM HAS FAILED A DEFENDANT'S IMPRISONMENT WITHOUT REVIEW WOULD AMOUNT TO A GROSS MISCARRIAGE OF JUSTICE.

RESPECTFULLY SUBMITTED,

S/ _____

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NOVEMBER 11, 2015

CERTIFICATE OF SERVICE

I, HAMID DEMMIRIO, CERTIFY THAT I HAVE SERVED THE NOTICE OF APPEAL ALONG WITH THE CERTIFICATE OF SERVICE ON DANIEL SHEARHOUSE, CLERK, 1231 GERVAIS STREET, BOX 11330, COLUMBIA, SOUTH CAROLINA 29211 BY DEPOSITING A COPY OF IT IN THE UNITED STATES MAIL, PREPAID, ON NOVEMBER 11, 2015

NOVEMBER 11, 2015
RIDGEVILLE, S.C.

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