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"Success is all that matters"

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November 25, 2015

Supreme Court of South Carolina
Post Office Box 11330
Columbia, SC 29211

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NOV 30 2015

RE: Charlton L. Hill, #152778 v. State of South Carolina
Case No.: 2013-CP-16-261

S.C. Supreme Court


Dear Clerk of Court:

Enclosed please find an original and one copy of a Notice of Appeal, along with the Order we are appealing in the above referenced matter. If you would, please file the Notice of Appeal and return a clocked copy to me in the envelope provided.

Please be advised that I have been court appointed to represent Mr. Hill in this matter.

Thank you for your assistance in this matter. If you have any questions or concerns, please feel free to contact my office.

With kind regards



Tristan M. Shaffer
Attorney at Law

TMS/kmg
Enclosures

cc: Jessica E. Kinard, Esquire
Darlington County Clerk of Court
Appellate Defense
Charlton L. Hill

SUPREME COURT OF SOUTH CAROLINA

APPEAL FROM DARLINGTON COUNTY
In The Court of Common Pleas

Honorable Thomas A. Russo,
Common Pleas Judge of the Fourth Judicial Circuit

Case No.: 2013-CP-16-261

Charlton L. Hill, #152778,

Petitioner,

v.

State of South Carolina,

Respondent.

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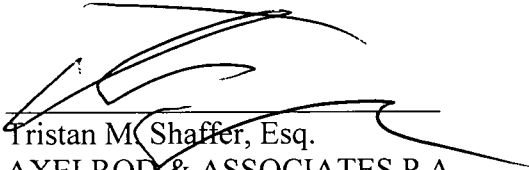
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S.C. Supreme Court

NOTICE OF APPEAL

Petitioner appeals the Order of Dismissal of the Honorable Thomas A. Russo dated October 7, 2015, filed October 10, 2015 and received by Petitioner on November 9, 2015.

November 24, 2015


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SUPREME COURT OF SOUTH CAROLINA

APPEAL FROM DARLINGTON COUNTY
In The Court of Common Pleas

Honorable Thomas A. Russo,
Common Pleas Judge of the Fourth Judicial Circuit

Case No.: 2013-CP-16-261

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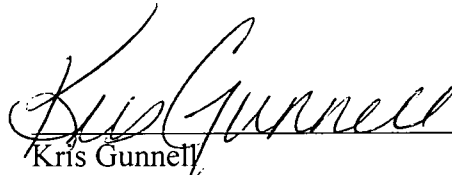
NOV 30 2015

S.C. Supreme Court

CERTIFICATE OF SERVICE

I, Kris Gunnell, do hereby certify that I am an employee of Axelrod & Associates, P.A., in Myrtle Beach, South Carolina, and that I have this date served the Petitioner's Notice of Appeal upon the Respondent, by depositing a copy of same in the United States Mail, postage prepaid, addressed as follows:

Jessica E. Kinard, Esquire S.C. Office of the Attorney General Post Office Box 11549 Columbia, SC 29211	Charlton L. Hill, #152778 McCormich Correctional Institution 386 Redemption Way McCormick, SC 29899
Darlington County Clerk of Court P.O. Box 1128 Beaufort, SC 29901-1128	Appellate Defense 1330 Lady Street Columbia, SC 29201



Kris Gunnell

Paralegal to Tristan M. Shaffer

November 24, 2015
MYRTLE BEACH, SOUTH CAROLINA

STATE OF SOUTH CAROLINA)
COUNTY OF DARLINGTON)

IN THE COURT OF COMMON PLEAS
FOR THE FOURTH JUDICIAL CIRCUIT

Charlton L. Hill, #152778,)

Case No. 2013-CP-16-261

Applicant,)

v.)

State of South Carolina,)

Respondent.)

**ORDER OF DISMISSAL
GRANTING WHITE V. STATE APPEAL**

TRUE CERTIFIED COPY,

Scott B. Suggs

CLERK OF COURT/RMC

This matter comes before the Court by way of an Application for Post-Conviction Relief filed March 25, 2013. Respondent made a timely Return on or about April 1, 2014. The Court convened an evidentiary hearing into the matter on July 27, 2015, at the Horry County Courthouse. Applicant was present at the hearing and represented by Tristan M. Shaffer, Esquire. Joshua L. Thomas, Esquire, of the South Carolina Attorney General's Office, represented Respondent.

Applicant testified on his own behalf at the evidentiary hearing. Applicant's trial counsels, Matthew S. Swilley, Esquire, and Emily M. Crayton, Esquire, also testified. The Court had before it a copy of the trial transcript, the records of the Darlington County Clerk of Court regarding the subject convictions, Applicant's records from the South Carolina Department of Corrections, Applicant's direct appeal records, the pleadings, and the exhibits introduced at the hearing. The Court finds as follows:

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CLERK OF COURT/RMC
DARLINGTON COUNTY, S.C.

I. PROCEDURAL HISTORY

Applicant is presently confined in the South Carolina Department of Corrections pursuant to orders of commitment of the Darlington County Clerk of Court. In September 2010, the Darlington County Grand Jury indicted Applicant for felony driving under the influence resulting in death (2010-GS-16-1335) and driving under suspension (2010-GS-16-1336). In April 2011, the Grand Jury indicted Applicant for failure to stop for a blue light resulting in death (2011-GS-16-422), reckless

homicide (2011-GS-16-423), and involuntary manslaughter (2011-GS-16-424). Matthew S. Swilley, Esquire, and Emily M. Crayton, Esquire, (collectively, "trial counsel") represented Applicant. On April 13, 2011, Applicant proceeded to trial before the Honorable J. Michael Baxley and a jury. The jury found Applicant guilty as indicted. Judge Baxley sentenced Applicant to concurrent terms of twenty-five years for felony driving under the influence resulting in death, ninety days for driving under suspension, ten years for reckless homicide, and five years for involuntary manslaughter. Judge Baxley sentenced Applicant to a consecutive term of ten years for failure to stop for a blue light resulting in death.

Applicant filed a notice of appeal, but the South Carolina Court of Appeals dismissed the appeal as untimely on May 24, 2012. The remittitur was returned to the circuit court on August 7, 2012.

II. ALLEGATIONS

In his application, Applicant alleged he is being held in custody unlawfully for the following reasons:

1. Applicant did not knowingly and voluntarily waive his right to a direct appeal.
2. Trial counsel failed to challenge the sufficiency of the indictment.
3. Trial counsel failed to challenge the blood test.
4. Trial counsel failed to object to the State's closing argument.
5. Trial counsel failed to move for a continuance.
6. Trial counsel failed to object to the jury instructions.
7. Trial counsel failed to object to the State's opening statement.
8. The State's prosecution was vindictive and violated the Double Jeopardy Clause.
9. Trial counsel failed to object to the trial judge questioning a witness.

At the evidentiary hearing, Applicant proceeded on only the following allegations:

1. Applicant did not knowingly and voluntarily waive his right to a direct appeal.
2. Trial counsel failed to object to the indictments that were served the morning of trial.
3. Trial counsel failed make Fourth Amendment and chain of custody objections to the blood draw.
4. Trial counsel failed to investigate witnesses that would have shown the victim was the driver of the car.
5. Trial counsel failed to object to the State's closing argument.

6. Trial counsel failed to request a continuance.
7. Trial counsel failed to argue involuntary manslaughter and reckless homicide are lesser included offenses of felony driving under the influence.

III. FINDINGS OF FACT AND CONCLUSIONS OF LAW

The Court has reviewed the record in its entirety and has heard the testimony and arguments presented at the evidentiary hearing. The Court has further had the opportunity to observe each witness who testified at the hearing, and to closely pass upon their credibility. The Court has weighed the testimony accordingly. Set forth below are the relevant findings of fact and conclusions of law as required by S.C. Code Ann. § 17-27-80.

A. Waiver of Right to Direct Appeal

The Court finds Applicant did not knowingly and voluntarily waive his right to a direct appeal. Trial counsel must ensure a criminal defendant is made fully aware of his appeal rights. White v. State, 263 S.C. 110, 118, 208 S.E.2d 35, 39 (1974). In the absence of a waiver by the defendant, counsel must initiate an appeal. White, 263 S.C. at 118, 208 S.E.2d at 39. Here, the evidence indicates Applicant desired an appeal. Mr. Swilley attempted to file a notice of appeal, but did so untimely. Therefore, the Court affirmatively finds Applicant requested and was denied an opportunity to seek appellate review. Accordingly, the Court hereby grants Applicant's request for a direct appeal of his conviction pursuant to White v. State.

B. Ineffective Assistance of Counsel

In this post-conviction relief action, Applicant bears the burden of proving the allegations in his application. Butler v. State, 286 S.C. 441, 442, 334 S.E.2d 813, 814 (1985) (citing Griffin v. Martin, 278 S.C. 620, 300 S.E.2d 482 (1983)). Where the application alleges ineffective assistance of trial counsel as a ground for relief, Applicant must prove trial counsel's "conduct so undermined the proper functioning of the adversarial process that the trial cannot be relied upon as having produced a just result." Id. (citing Strickland v. Washington, 466 U.S. 668, 686 (1984)).

The proper measure of performance is whether trial counsel provided representation within the range of competence required in criminal cases. Id. (citing Strickland, 466 U.S. at 687; Turner v. Bass, 753 F.2d 342 (4th Cir. 1985); Marzullo v. Maryland, 561 F.2d 540 (4th Cir. 1977)). The Court strongly presumes trial counsel rendered adequate assistance and made all significant decisions in the exercise of reasonable professional judgment. Id. (citing Strickland, 466 U.S. at 690). Applicant must overcome this presumption in order to receive relief. Cherry v. State, 300 S.C. 115, 118, 386 S.E.2d 624, 625 (1989).

The court applies a two-pronged test in evaluating allegations of ineffective assistance of trial counsel. Id. at 117, 386 S.E.2d at 625. First, Applicant must prove trial counsel's performance was deficient. Id. Under this prong, the Court measures trial counsel's performance by its "reasonableness under prevailing professional norms." Id. (citing Strickland, 466 U.S. at 688). Second, trial counsel's deficient performance must have prejudiced Applicant such that "there is a reasonable probability that, but for counsel's unprofessional errors, the result of the proceeding would have been different." Id. at 117-18, 386 S.E.2d at 625.

1. Indictments and Continuance

The Court finds Applicant failed to meet his burden to show trial counsel ineffective in failing to object to the timeliness of service of the indictments or to move for a continuance. An indictment is a notice document. State v. Gentry, 363 S.C. 93, 102, 610 S.E.2d 494, 500 (2005). The Court finds credible and dispositive Swilley's testimony that he knew the failure to stop for a blue light resulting in death, reckless homicide, and involuntary manslaughter indictments would be presented to the grand jury. He also testified the regular practice in the Fourth Circuit is to indict defendants for reckless homicide and involuntary manslaughter when the defendant is also indicted for felony driving under the influence resulting in death. Ms. Crayton also testified she was aware the additional charges were forthcoming when she became involved in the case shortly before trial. The record before this court

indicates trial counsel was on notice of the charges that would be brought to trial. Accordingly, trial counsel was not deficient in failing to move to quash the indictments or to move for a continuance. See Palacio v. State, 333 S.C. 506, 514, 511 S.E.2d 62, 67 (1999) (no deficiency where “it would have been futile for Attorney to have made such arguments”). Furthermore, Applicant has not demonstrated he was prejudiced by trial counsel forgoing these motions because they would not have been successful even if made. The record indicates trial counsel conducted a proper investigation, adequately conferred with Applicant, and were thoroughly competent in their representation. They were not ineffective in failing to object to the indictments or to move for a continuance.

2. Challenge to Blood Draw

The Court finds Applicant failed to meet his burden to prove trial counsel ineffective in failing to make a Fourth Amendment objection to his blood draw. A blood draw after an arrest for driving under the influence constitutes a search and implicates the Fourth Amendment prohibition on unreasonable searches and seizures. Schmerber v. California, 384 U.S. 757, 767 (1966). Accordingly, a warrant is normally necessary to conduct a search in the form of a blood draw. Id. at 770. However, the Fourth Amendment “warrant requirement is subject to exceptions.” Missouri v. McNeely, 567 U.S. ___, 133 S. Ct. 1552, 1558 (2013).¹ One such exception is when an individual consents to the search. State v. Provet, 405 S.C. 101, 113, 747 S.E.2d 453, 460 (2013) (citing Palacio, 333 S.C. at 514, 511 S.E.2d at 66).

Here, the record indicates Applicant consented to giving a blood sample at the hospital. The nurse who took the sample testified Applicant consented to the blood draw. (Trial Tr. p. 158, lines 15-16). Applicant’s Exhibit Number Three, Applicant’s hospital records, indicates Applicant was cooperative in the hospital. Swilley testified he did not recall Applicant stating he did not consent to the blood draw. Crayton testified she did not see any information in discovery indicating Applicant

¹ The Court notes McNeeley was decided after Applicant’s trial and has no bearing on any issues raised in this Application.

denied consenting to the blood draw. She also testified she did not believe there were any viable Fourth Amendment arguments to challenge the blood draw at the time of trial.

The only evidence in the record that Applicant did not consent is his testimony at the evidentiary hearing, which the Court dismisses as not credible. The Court is also not persuaded by Applicant's argument that the arresting officer reading the implied consent form to him rendered his consent involuntary. See United States v. Sugiyama, No. 15-PO-5065, 2015 WL 4092494, at *9 (D. Md. July 6, 2015) ("Consent is not coerced (and thus rendered involuntary) simply because the State has attached criminal penalties for refusing to provide consent."). Accordingly, Applicant has not demonstrated trial counsel was deficient in failing to raise a Fourth Amendment objection to Applicant's blood draw. See Palacio, 333 S.C. at 514, 511 S.E.2d at 67; see also State v. Sarvis, 265 S.C. 144, 147, 217 S.E.2d 38, 40 (1975) ("The blood sample was withdrawn by the doctor at the hospital with the permission of respondent."). Applicant has also failed to show he was prejudiced by counsel's failure to make a Fourth Amendment objection because such an objection would not have been successful where Applicant consented to the blood draw.²

The Court also find Applicant failed to meet his burden to show trial counsel ineffective in failing to make a chain of custody objection to the blood draw. Initially, the Court notes trial counsel did object to the introduction of the blood sample based on the incomplete chain. (Trial Tr. p. 217, lines 4-9). Therefore, trial counsel could not be deficient in this regard. Similarly, any issues relating to the chain of custody are properly raised in a direct appeal. Simmons v. State, 264 S.C. 417, 423, 215 S.E.2d 883, 885 (1975) ("It is uniformly held that an application for post-conviction relief is not a substitute for an appeal.").

² The Court also notes the blood draw may have also been admissible under a number of other exceptions to the warrant requirement. See McNeely, 133 S. Ct. at 1561 (exigent circumstances must be evaluated on case-by-case basis); S.C. Code Ann. § 56-5-2956 (mandatory blood draw where there is probable cause to believe person committed offense of felony driving under the influence); United States v. Reid, 929 F.2d 990, 994 (4th Cir. 1991) (warrantless breath test valid as search incident to arrest).

Regardless, the trial transcript indicates the chain of custody is fully established. The nurse who drew the blood testified. The investigator who took custody of the sample and transported it to the State Law Enforcement Division (“SLED”) testified. The SLED chemist who analyzed the blood testified. This testimony is sufficient to establish the chain of custody. State v. Hatcher, 392 S.C. 86, 91, 708 S.E.2d 750, 753 (2011) (State need only establish chain of custody “as far as practicable.” (citations omitted)). Applicant’s argument regarding the lack of a signature on a SLED request form may go to the weight and credibility of the evidence, but does not affect its admissibility under these circumstances. State v. Johnson, 318 S.C. 194, 196, 456 S.E.2d 442, 444 (Ct. App. 1995) (reconciliation of discrepancy on forms not necessary to establish the chain of custody but merely reflects upon credibility of evidence). Therefore, Applicant has not shown he was prejudiced by trial counsel not making a further objection to the blood sample.³

3. Failure to Investigate Witnesses

The Court finds Applicant failed to meet his burden to show trial counsel ineffective in failing to investigate witnesses who would have shown the victim was driving the vehicle. Failure to conduct an independent investigation is not *per se* ineffective assistance of counsel, especially where an investigation would not have uncovered any helpful information. See Moorehead v. State, 329 S.C. 329, 334, 496 S.E.2d 415, 417 (1998). Applicant testified the victim was driving the car at the time it careened off the road, and that the police staged photos of him in the driver’s seat. The Court finds this testimony wholly not credible and refuted by the record. The evidence at trial indicated Applicant was seen driving the car by the pursuing officer. After the car crashed, Applicant was behind the steering wheel. A tree limb entered the passenger side windshield of the car and would have caused serious

³ To the extent Applicant alleges his blood draw cannot be used as evidence in a prosecution for any offenses not listed in the motor vehicle code, that argument is not supported by any authority or argument. Applicant’s intoxication and operation of a motor vehicle are part of the *res gestae* of his involuntary manslaughter and reckless homicide charges, and the blood evidence is both relevant and admissible in the prosecution for those crimes.

injury to the head and neck of any person in the passenger seat. Interestingly, the victim died from injuries to her head and neck consistent with impacting the tree limb.

Swilley testified Applicant maintained he was not driving the car, but that he could see Applicant driving in the dash-cam video. He testified he spoke with Applicant's mother about the possibility the victim was driving the car, but the mother was not able to recall any details. Swilley stated he was unable to locate any witnesses to refute the evidence Applicant was driving the car. The Court finds credible Swilley's testimony that he attempted to investigate this issue, and find his performance in this regard reasonable and not deficient.

Regardless, Applicant also failed to prove prejudice. Applicant presented no witnesses at the evidentiary hearing to demonstrate he was not driving the vehicle when it crashed. As such, the Court will not speculate as to what any other witnesses would testify about at trial. Dempsey v. State, 363 S.C. 365, 369, 610 S.E.2d 812, 814 (2005) ("A PCR applicant cannot show that he was prejudiced by counsel's failure to call a favorable witness to testify at trial if that witness does not later testify at the PCR hearing or otherwise offer testimony within the rules of evidence." (citing Glover v. State, 318 S.C. 496, 498, 458 S.E.2d 538, 540 (1995))). Trial counsel simply was not ineffective in failing to investigate Applicant's absurd claim he was not driving the car.

4. The State's Closing

The Court finds Applicant failed to demonstrate trial counsel ineffective for failing to object to the State's closing argument. Applicant argues the solicitor improperly vouched for the credibility of the investigators and medical personnel. Swilley testified he did not deem anything the solicitor said to be objectionable. The Court agrees with Swilley's analysis. The Court has reviewed the portions of the argument Applicant alleges were inappropriate, and finds no inappropriate vouching. The solicitor neither "places the government's prestige behind a witness by making explicit personal assurances of a witness' veracity" nor "indicat[es] information not presented to the jury supports the testimony." State

v. Shuler, 344 S.C. 604, 630, 545 S.E.2d 805, 818 (2001) (citations omitted). Rather, he indicated the manner in which the witnesses testified lent credibility to their testimony. This argument is not improper because “[a] solicitor has the right to state his version of the testimony and to comment on the weight to be given such testimony.” State v. Caldwell, 300 S.C. 494, 505, 388 S.E.2d 816, 822 (1990) (citing State v. Allen, 266 S.C. 468, 224 S.E.2d 881 (1976)), overruled on other grounds by State v. Evans, 371 S.C. 27, 637 S.E.2d 313 (2006). Therefore, trial counsel was not defective in choosing to not lodge an objection to any portion of the State’s closing. See, e.g. Braithwaite v. State, 572 S.E.2d 612, 615-16 (Ga. 2002); (“Here, Braithwaite's attorney reasonably chose silence, and we will not use hindsight to second-guess that decision on appeal.”); State v. Tokar, 918 S.W.2d 753, 768 (Mo. 1996) (“In many instances seasoned trial counsel do not object to otherwise improper questions or arguments for strategic purposes.”); United States v. Necoechea, 986 F.2d 1273, 1281 (9th Cir. 1993) (“Because many lawyers refrain from objecting during opening statement and closing argument, absent egregious misstatements, the failure to object during closing argument and opening statement is within the ‘wide range’ of permissible professional legal conduct.”).

Applicant also failed to demonstrate the State’s closing was prejudicial in light of the entire record, including the overwhelming evidence of his guilt. Brown v. State, 383 S.C. 506, 516, 680 S.E.2d 909, 914-15 (2009) (citations omitted). Furthermore, the trial judge consistently reminded the jury that an attorney’s arguments are not evidence. See State v. Dawkins, 297 S.C. 386, 393, 377 S.E.2d 298, 302 (1989) (judge’s instruction sufficient to cure error from improper arguments). Accordingly, trial counsel was not ineffective in this regard.

5. Double Jeopardy

The Court finds Applicant failed to meet his burden to demonstrate trial counsel ineffective in failing to object to his prosecution on charges of both reckless homicide and involuntary manslaughter. Swilley testified he objected to Applicant being tried for these two crimes as well as felony driving

under the influence. However, he testified the case law was against him at the time. The Court agrees with Swilley's assessment, as the case law does not regard reckless homicide and involuntary manslaughter as lesser included offenses of felony driving under the influence. State v. Cribb, 310 S.C. 518, 524, 426 S.E.2d 306, 310 (1992) (“[R]eckless homicide and involuntary manslaughter are not lesser included offenses of felony DUI.”); see also State v. Easler, 327 S.C. 121, 133, 489 S.E.2d 617, 624 (1997) (“[F]elony DUI requires proof of the element of driving under the influence, whereas reckless homicide does not.”). Because felony driving under the influence, reckless homicide, and involuntary manslaughter each require proof of different elements, Applicant can be properly convicted of all three offenses. Trial counsel was not deficient for not making further arguments against precedent, and Applicant was not prejudiced because such arguments are not meritorious. Palacio, 333 S.C. at 514, 511 S.E.2d at 67.

6. Overwhelming Evidence of Guilt

Independent of the above analysis, the Court finds Applicant cannot show he was prejudiced by an actions or decision of trial counsel because the record contains overwhelming evidence of his guilt. The arresting officer saw Applicant driving the vehicle before it crashed. After the crash, Applicant was behind the steering wheel. The victim's injuries were consistent with the theory that she was sitting in the passenger seat, where a tree limb entered the passenger side windshield of the car and would have caused serious injury to the head and neck of any person in the passenger seat. Applicant's consensual blood test was positive for alcohol, cocaine, hydrocodone, marijuana, Tramadol, and Soma. Accordingly, Applicant cannot show prejudice from trial counsel's actions. See Harris v. State, 377 S.C. 66, 79, 659 S.E.2d 140, 147 (2008) (no prejudice where there is overwhelming evidence of guilt).

B. All Other Allegations

As to any and all allegations that were raised in the application or at the hearing in this matter

and not specifically addressed in this order, the Court finds Applicant failed to present any evidence regarding such allegations. Accordingly, the Court finds Applicant has abandoned any such allegations.

IV. CONCLUSION

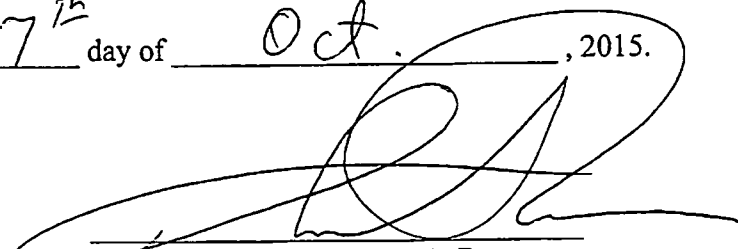
Based on the foregoing, the Court finds and concludes Applicant has not established any constitutional violations or deprivations that would require this Court to grant his application. Therefore, this application for post-conviction relief must be denied and dismissed with prejudice. However, Applicant is entitled to a review of direct appeal issues pursuant to White v. State.

The Court notes Applicant must file and serve a notice of appeal within thirty (30) days from counsel's receipt of written notice of entry of judgment to secure the appropriate appellate review. See Rule 203, SCACR. Counsel and Applicant are directed to Davis v. State, 288 S.C. 290, 342 S.E.2d 60 (1986), for the appropriate procedure for securing appellate review pursuant to White v. State.

IT IS THEREFORE ORDERED THAT:

1. The Application for Post-Conviction Relief is denied and dismissed with prejudice; and
2. Applicant must be remanded to the custody of the Department of Corrections to complete service of his sentence; and
3. Applicant shall be entitled to seek review of his direct appeal issues.

AND IT IS SO ORDERED this 7th day of Oct., 2015.


THE HONORABLE THOMAS A. RUSSO
Presiding Judge

Florence, South Carolina

AXELROD

& ASSOCIATES
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4701 Oleander Drive ♦ Myrtle Beach, SC 29577

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