

 ORIGINAL

STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FAIRFIELD COUNTY
R. Knox McMahon, Circuit Court Judge

IN THE MATTER OF THE CARE AND TREATMENT OF LARRY
HENDRICKS,

APPELLANT

APPELLANT CASE NO. 2014-000205

SUPPLEMENTAL RECORD ON APPEAL

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Appellate Defender

South Carolina Commission on Indigent Defense
Division of Appellate Defense
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Attorneys for Respondent

RECEIVED
APR 29 2015
SC Court of Appeals

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Larry Edward Hendricks



Winnsboro, SC 29180

Betty Jo Beckham
Fairfield County Clerk of Court
Winnsboro, SC

2013 OCT 30 AM 10 51
FAIRFIELD COUNTY
CLERK OF COURT
BETTY JO BECKHAM

October 28, 2013

Re: STATE v. Hendricks, 2012-CP-20-0358.

Dear Ms. Beckham,

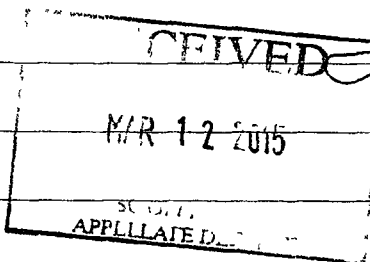
Please find enclosed 2 motions for filing with The Presiding Judge for The Court of Common Pleas.

Could you please check The docket for December and let me know if this case is on the docket? Also could you please return me a clocked stamp copy for my records?

I appreciate your time and attention to this matter.

Sincerely,

Larry Edward Hendricks



2013 OCT 30 AM 10 51

STATE OF SOUTH CAROLINA } IN THE COURT OF COMMON PLEAS
 FAIRFIELD COUNTY }
 County of FAIRFIELD } CLERK OF COURT
 BETTY JO BECKHAM } SIXTH JUDICIAL CIRCUIT

STATE OF SOUTH CAROLINA,
 Plaintiff,

v.

Larry Edward Hendricks,
 Movant/Respondent.

CASE No.: 2012-CP-20-0358

MOTION TO AUTHORIZE
 PROPER ATTIRE FOR TRIAL

The Movant, proceeding pro-se, would move this Honorable Court to Order the Plaintiff to make resources available so that the Movant's appearance, in the status of one conducting his own defense, will not be prejudiced by his jail garb. Estelle v. Williams, 425 U.S. 501, 504-505, 96 S.Ct. 1691 (1976).

The Movant came to the county detention facility directly from the Dept. of Corrections, and as such does not have access to suitable clothing, as one would have if appearing outside of the conditions of confinement. To impose a condition on one category of individuals over another could be repugnant to the concept of equal justice embodied in the Fourteenth Amendment. Gritter v. Illinois, 351 U.S. 12 (1956).

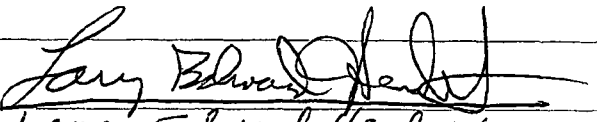
Therefore, the Movant requests an Order

authorizing the obtaining of proper clothing in which to appear before the Court, to eliminate any undue prejudice based on appearance, and allow for a fundamental liberty, to secure a fair trial.

THIS THE MOVANT HUMBL Y PRAYS!

October 28, 2013

Respectfully submitted:


Larry Edward Hendricks

CERTIFICATE OF SERVICE

By the above signature, this date, a copy of this Motion has been forwarded via U.S. Mail, First Class TO: James G. Bogle, Jr., Senior Asst. Attorney General, PO Box 11549, Columbia, SC 29211, and Ernest Spong III, 110 S. Vanderhorst St., Winnsboro, SC 29180.

OCT 30 AM 10 51
FAIRFIELD COUNTY
CLERK OF COURT
BETTY JO BECKHAM

2013 OCT 30 AM 10:51
 FAIRFIELD COUNTY
 CLERK OF COURT
 BERO BECKHAM
 THE COURT OF COMMON PLEAS
 SIXTH JUDICIAL CIRCUIT

STATE OF SOUTH CAROLINA
 County of Fairfield

State of South CAROLINA
 Plaintiff

v.

Larry Edward Hendricks
 Movant/respondent

Case No. : 2012-CP-20-0358

MOTION TO DISMISS

The Movant, Larry Edward Hendricks, who filed a Motion To Appoint Assigned Counsel to Stand by Status, with the Clerk of Court on October 21, 2013, now comes before this Honorable Court, pro-se, to move it to Dismiss the above referenced action pursuant to Rule 12(b) South Carolina Rules of Civil Procedure.

The basis for this Motion is that the matter pending before the court violates Article 1, § 8, of the South Carolina Constitution. That Article states in pertinent part that, "the legislative, executive, and judicial powers of the government shall be forever separate and distinct from each other, and no person or persons exercising the functions of one said department shall assume or discharge the duties of any other," McConnell v. Haley, 711 S.E.2d 886 (SC 2011).

S.C. Code of Law § 44-48-30(2)(1) + (6)(a), are offensive to the state's constitutional provision of Separation of Powers, by allowing the Executive Branch to re-open final judgments of

the Judicial Branch to consider what the Judicial Branch had declared as non-violent offenses to now be violent, for purposes of the sexual violent predator Act (SVPA).

The determination of an offense is declared at the time of its occurrence. The judge at sentencing makes all final determinations. *Hill v. U.S., ex. rel. Wampler*, 298 U.S. 460, 56 S.Ct. 760 (1936); *Jones v. Cunningham*, 370 U.S. 236, 240-243, 83 S.Ct. 373 (1963); *Early v. Murray*, 451 F.3d 75 (CA2, 2006) (only the judgment of a court, as expressed through the sentence imposed by a judge has the power to constrain a person's liberty, and that judgment includes only those terms expressly imposed.). Once a determination has been made by a member of the judicial branch of government any deviation would violate The Separation of Powers Doctrine.

Therefore, when the General Assembly directed the attorney general to reclassify the Movant, it impermissibly invaded the province of the judiciary by mandating the reopening of a final judgment, and by directing that a judicial function be performed by a member of the Executive Branch of government.

It is well settled principle that the legislature cannot annul, reverse, or modify a judgment of a court, already rendered. A judgment which is final by the laws existing when it is rendered, cannot constitutionally be made subject to review by a statute subsequently enacted, as is the case of the SVPA.

The offenses occurred in 1997. The statute was enacted afterwards. This Court has the inherent power to do all things reasonably necessary to insure that just results are reached to the fullest extent possible. STATE v. Langford, 735 SE2d 471 (SC 2012); Robinson v. Estate of Harris, 698 SE2d 801 (SC 2010). As such §44-48-30, as applied in this matter, is unconstitutional in that it requires the attorney general, a member of the Executive Branch of government, to reclassify sex offenders, by a new definition, who had previously been adjudicated and classified pursuant to a final order of a court.

The General Assembly may not overturn a final judgment at law by legislative mandate. Plaut v. Spendthrift Farm, Inc., 514 U.S. 211, 115 S.Ct. 1447 (1995). This is not a collateral consequence but an infringement upon the Movant's Constitutional rights.

As such this Motion to Dismiss is based solely on the allegation contained in the "Petition pursuant to the SVPA," filed on September 4, 2012, Gressette v. SCE & G, 635 SE2d 538 (SC 2006), and as such should be Dismissed with prejudice pursuant to Rule 12(b), SCRPC, based on a violation of the Separation of Powers doctrine incorporated in the State's Constitution.

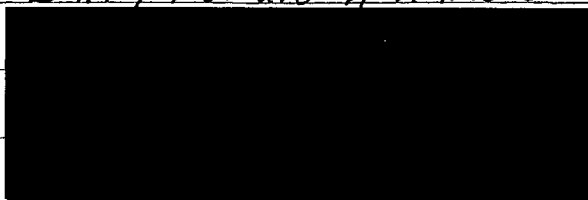
THIS THE MOVANT HUMBL Y PRAYS!

October 28th, 2013

Respectfully Submitted,

Larry Edward Hendricks

Larry Edward Hendricks



CERTIFICATE OF SERVICE BY MAIL

By The above signature, this date, a copy of this Motion has been forwarded via First class U.S. mail, TO: James G. Bogle, Jr., Senior Asst. Attorney general, PO Box 11549, Columbia, SC 29211, and Ernest Spong III, 110 S. Vanderhost Street, Winnsboro, SC 29180.

2013 OCT 30 AM 10 52
FAIRFIELD COUNTY
CLERK OF COURT
BETTY JO BECKHAM

COPY

Larry Edward Hendricks



2013 NOV 1 AM 11 27

FAIRFIELD COUNTY
CLERK OF COURT
BETTY JO BECKHAM

Copy
mailed
to by
& att
Spence

Fairfield County Clerk of Court
Winnabow, SC

October 30, 2013

Dear Sir or Madam;

Please find enclosed for filing two documents.
Would you please forward a copy of each to The
Chief Administrative Judge for The Court of Common
Pleas? I would also request copies be sent to
me clocked stamped, for my records.

I appreciate your attention to this matter.

Sincerely,
Larry Edward Hendricks

STATE OF SOUTH CAROLINA } IN THE COURT OF COMMON PLEAS
 County of FAIRFIELD } SIXTH JUDICIAL CIRCUIT
 2013 NOV 1 AM 11 27
 FAIRFIELD COUNTY
 CLERK OF COURT
 BETTY JO BECKHAM
 State of South Carolina } CASE No.: 2012-CP-20-0358
 Petitioner,
 v. } OPPOSITION TO PETITIONER'S
 Larry Edward Hendricks, } REQUEST FOR A JURY TRIAL
 Respondent, }

The Respondent, Larry Edward Hendricks, comes now before this Honorable Court in Opposition to the Petitioner's request for a jury trial filed on October 2, 2012. As of this writing an order has not been issued, or filed, granting said request.

S.C. Code of LAWS 44-48-90, specifically uses the term "may" to allow "the trial before a jury." The term "May" is not mandatory, but discretionary, and must be approved in a written order of the court, not assumed.
 Rule 52(a) SCRPC.

Based on established precedent, under the rules of interpreting statutes, the Court looks to the plain meaning of the statute and the intent of the legislature. *Cay v. Arial*, 673 SE2d 418 (SC 2009). The Respondent opposes a jury trial because of the technical nature of a commitment hearing and the prejudice that can

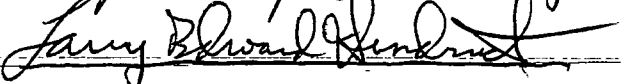
be induced because of the sexual nature of the proceedings. Unless the Petitioner plans to bias a jury through emotions regarding Respondent's past offenses, the standard of clear and convincing evidence cannot be met as espoused by the U.S. Supreme Court in Kansas v. Hendricks, 521 U.S. 346, 117 S.Ct. 2072 (1997), which is controlling precedent, because the South Carolina Act is pattern and derived from that decision. STATE v. Gaster, 564 SE2d 87 (SC 2002); In re Matthews, 550 SE2d 331 (2001).

A learned jurist, not a jury would level the playing field and allow prosecutorial nuances not distract or deceive an emotional jury. This is essential to fundamental fairness while the Respondent is defending himself, pro-se, in this matter.

As such, the Respondent would ask the Court NOT to grant the Petitioner's request and proceed to trial upon learned jurist alone.

THIS THE PETITIONER HUMBLLY PRAYS!

October 30, 2013

Respectfully Submitted;

 Larry Edward Hendricks



STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
 County of FAIRFIELD 2013 NOV 1) SIXTH JUDICIAL CIRCUIT
 AM 11 28

State of South Carolina) FAIRFIELD COUNTY
 Clerk of Court) No. 2012-CP-20-0358
 Plaintiff,) BETTY JO BECKHAM

v.) MOTION FOR A RULING
 Larry Edward Hendricks,) TO SHOW CAUSE
 Movant/Respondent.)

TO: THE CHIEF ADMINISTRATIVE JUDGE FOR THE
 SIXTH JUDICIAL CIRCUIT, COURT OF COMMON PLEAS.

NOW COMES the Movant, above named, proceeding pro-se, who humbly comes before this Honorable Court for a Ruling to show cause, how the Plaintiff received Orders in its favor, from two different Judges, without the required Motions or Requests being filed with The Clerk of Court, in accordance with The S.C. Rules of Civil Procedures.

The Orders in question, in chronological order are: Order of Continuance filed March 14, 2013; and an Order filed MAY 28, 2013. Neither order has a filed motion or request that correspond.

As such, the Movant ask for The Court To Rule Whether Ex Parte Communications existed, or a clear violation of the Rules of Civil Procedure, denying

The movant his Constitutional rights to procedural Due Process.

The Movant has a Due Process right to know, and oppose, the substance of any motion or request. With the said Orders being issued without any supporting or requesting material, a Due Process and possibly Ex Parte Communication Violation has occurred.

The Order for Continuance supposedly came from a "Request for Extension". The Movant, and the Movant's counsel at the time, had a right to oppose such a request, but if the request is not filed with the Clerk, how can opposition be heard or notice given?

The same is true of the second "order" of May 28, 2013. The Movant was in the Fairfield County Detention Center at that time and should have been available before the Court to oppose said request.

The matter before the court, the sixth circuit, pursuant to the Sexual Violent Predator Act, is the offense only adjudicated in this circuit. The material requested was from the Fifth Circuit and an argument could be made that this court lack jurisdiction of the subject matter to decide that issue. *Gribb v. Spatholt*, 676 SE2d 714 (SC 2009). As such no notice was given and Movant was denied an opportunity to argue, violating his procedural protections. *Kurshner v. City of Camden et al.*, 656 SE2d

346 (SC 2008).

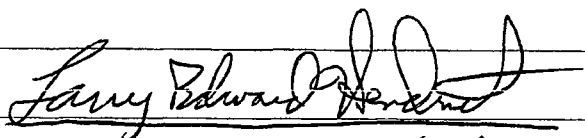
So, Article 1, §3, of the S.C. Constitution was violated by the actions of the Plaintiff, and contempt of Court sanctions should be levied to admonish them against violating the Movant's, and those similarly situated, rights to Due Process. The willful disobedience of Rules of Court and/or the state's Constitution are clear grounds for contempt of Court sanctions as defined by *Bones v. U.S. Foods*, 733 SE2d 200, 205 (SC 2012); *Knight v. Austin*, 722 SE2d 802 (SC 2012).

The Movant humbly request that this Court order the Plaintiff to show cause why sanctions should not be issued for the blanton action described herein, and an Ex Parte Injunction immediately be put into effect.

THIS THE MOVANT HUMBLY PRAYS!

October 30, 2013

Respectfully Submitted;



Larry Edward Hendricks

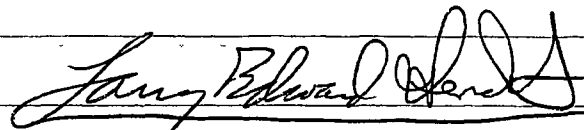


CERTIFICATE OF SERVICE

By the Below signature, I, The Movant/Respondent have hereby served the attached documents upon the Plaintiff/Petitioner's attorney, James C. Bogle, Jr., Senior Asst. Attorney General, P.O. Box 11549, Columbia, SC, by utilizing The U.S. Postal Service, First class postage prepaid.

Standby Counsel, Ernest Sprong III, 110 S. Vanderhost St., Winnsboro, SC was served by giving a copy of the documents in a sealed envelope, addressed to him for pickup when he comes to the detention center

October 30, 2013


Larry Edward Hendricks

2013 NOV 1 10 11 28
FAIRFIELD COUNTY
CLERK OF COURT
BETTY JO BECKHAM

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
County of FAIRFIELD)
2014 JAN 9 PM 9:10 SIXTH JUDICIAL CIRCUIT

FAIRFIELD COUNTY
CLERK OF COURT
BETTY JO BECKHAM

State of South Carolina,) CASE No.: 2012-CP-20-0358

Petitioner,

v.

Larry Edward Hendricks,

Respondent.

MOTION TO DISMISS

PURSUANT TO Rules

12 (b) & 41(b) SCRPC

The Respondent, above named, hereby motions this Honorable Court to dismiss the above referenced case pursuant to Rule 12(b)(1) and 41(b) of the South Carolina Rules of Civil Procedure (SCRPC). The reason matter should be dismissed is because this Court lacks jurisdiction to entertain this subject matter.

This case was erroneously filed in this jurisdiction. It was filed based on S.C. Code of LAW (ANN) §44-48-10 et. seq. (2012), which contains specific language that states, "the attorney general must file a petition with the court in the jurisdiction where the person committed the offense . . ." S.C. Code §44-48-50.

The erroneously qualifying offense, Lewd Act upon a minor, was repealed by Legislative Act 255 effective June 12, 2012. Though a saving clause existed, the state did not start this action before the effective date of the repeal.

The question of subject matter jurisdiction is a

question of law, for the court. *Hammer v. Hammer*, 730 SE2d 874 (SC App 2012). The concept of jurisdiction refers to the authority of a court over a particular person or the authority of a court to entertain a particular action, but the concept does not refer to the validity of the claim on which an action or person is based. *Cribb v. Spatholt*, 676 SE2d 714 (Ct. App. 2009).

The subject matter here, a hearing to determine whether the Respondent fits the requirements to be involuntarily civilly confined, requires a particular predicate offense. That offense must be one adjudicated by the Court in which a conviction was upheld. The fact that the legislature choose to repeal the statute §16-15-140, without putting in a saving clause referencing the SUPA, or a conforming amendment, clearly meant that once the effective date occurred, that statute was repealed and any claim referencing it, thereafter, done away with it.

The Respondent has a state and federal constitutional right to liberty, through the Due Process Clause. Subject matter jurisdiction can not be waived or forfeited.

Gonzalez v. Thaler, 132 S.Ct. 641, 648 (2012). As such, this matter can no longer be pursued in this venue because there is no relative offense to bring the SUPA into play in this judicial circuit.

The Rules of statutory construction and legislative intent clearly come into play here. *Gay v. Arial*, 673 SE2d 418 (SC 2009). The legislature repealed the

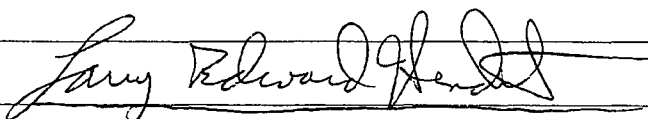
offending statute, making it not valid as a qualifying offense after the effective date of the repeal. There was no saving clause or conforming amendment to Act 255. Chem-nuclear Systems, LLC v. S.C. Bd. of Health and Env'l Ctrl., 648 SE2d 601 (SC 2007).

As such, Rule 12(b)(1), and Rule 40(b) SCRPC allows for this matter to be dismissed because of the Court's lack of jurisdiction to entertain this subject matter.

CONCLUSION


Based on the above argument and cited facts, The Motion to Dismiss should be GRANTED.

Respectfully submitted;



Larry Edward Hendricks

Respondent, Pro-se

January 7th, 2014 

Larry Edward Hendricks



Betty Jo Beckham
Fairfield County Clerk of Court
Winnsboro, SC

2014 JAN 9 PM 3 10
FAIRFIELD COUNTY
CLERK OF COURT
BETTY JO BECKHAM

January 7, 2014

Dear Mrs. Beckham;

Please find enclosed for filing two documents. Would you please make a copy available for my upcoming motion hearing and return a clocked stamped copy for my records? Would you also alert me to the date the motion hearing has been set for?

I appreciate your time and attention to this matter.

With Best Regards,
Larry Edward Hendricks

cc:File

Atty Gen. Bayle

STATE OF SOUTH CAROLINA } IN THE COURT OF COMMON PLEAS
 County of FAIRFIELD } 310th JUDICIAL CIRCUIT

2014 JAN 17 PM
 FAIRFIELD COUNTY
 CLERK OF COURT
 BETTY JO BECKHAM

State of South Carolina,
 Plaintiff,

Case No.: 2012-CP-20-0358

v.

MOTION TO DISMISS

Larry Edward Hendricks,
 Respondent.

Pursuant to Rule 41, SCRPC

The Respondent, Larry Edward Hendricks, proceeding pro-se, moves this Honorable Court to Dismiss the above referenced proceedings' petition pursuant to Rule 12(b), and Rule 41(b) of the South Carolina Rules of Civil procedure (SCRPC).

The basis for this Motion is the Plaintiff's violation of the Respondent's right to Due Process as entitled to him under both the state and federal constitution, through its failure to prosecute. *McComas v. Ross*, 626 SE2d 902, 904 (Ct. App. 2006). The Plaintiff is obligated under state statutory law to have this matter before the Court "within ninety days of the date the court appointed expert issued the [psych] evaluation" The language of the statute, S.C. Code of Law § 44-48-90(B) is of a mandatory construction that must be adhered to and creates a state-created liberty interest in its timeline, being obeyed. *In re Care + Treatment of Matthews*, 550

SE 2d 311 (2001).

The court appointed expert issued her report on July 9, 2013. The Respondent received a copy on July 11, 2013. For the Plaintiff to abide by the statutory intent, the SVPA commitment hearing would be held no later than during the October, 2013 term. Though there is no record of a continuance or a request for a trial date being filed with the court, the Chief Administrative Judge did file with the court's clerk an "Order Setting Jury Trial," for January 27, 2014, last September, 2013. This would be six months after the court appointed expert's report.

The Respondent understands that the state may have the authority to create, or not, a standard in a statute, but once that state-created right is instituted then Article 1, §3 of the South Carolina Constitution and the Fourteenth Amendment requires, through the Due Process Clause insurances that the state-created right is not arbitrarily abrogated. Wolff v. McDonnell, 418 U.S. 539 (1974); Sander v. Conner, 515 U.S. 472, 489-484 (1995) (the states may, under certain circumstances, create liberty interests which are protected by the Due Process Clause).

Clearly substantial prejudice has occurred because the Respondent's liberty was deprived him, after he finished his term of incarceration, while awaiting a hearing. Any delays furthers that

loss of liberty. Because of the mandatory pre-trial detention scheme of S.C. Code §44-48-80 and §44-48-90, the Respondent's constitutional rights were seriously put in jeopardy due to the state's non-adherence to its legislature's expressed intention to have these types of cases before the court in a timely manner.

As such, the state's petition should be dismissed with prejudiced ^{due} to the state's failure to pursue the prosecution of this matter in a reasonably timely manner. The South Carolina Supreme Court has noted that, "It is not a significant burden on the state or the trial court to require the issuance of a continuance, or even a notation in the record, indicating: (1) the trial cannot be held within [ninety] days; (2) good cause for the delay; and the respondent will not suffer prejudice." Matthews, 550 SE2d at 314.

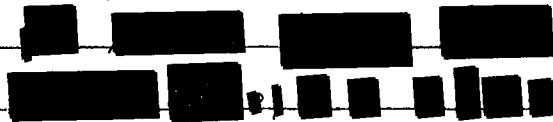
Based on the precedent incorporated in The matter + Care of Miller, 713 SE2d 263 (SC 2011), and Rule 41(B) SCRPC, this court is authorized to grant a dismissal with prejudiced and release the Respondent for failure to prosecute which denied the Respondent liberty through the state's procedural malfeasance.

THIS THE RESPONDENT HUMBLLY PRAYS!

Respectfully submitted,

Larry Edward Hendricks

Larry Edward Hendricks
Respondent, Pro-se



January 7th, 2014

CERTIFICATE OF SERVICE

By the above signature, I, the Respondent, has served a copy of the above Motion to Dismiss and a second Motion to Dismiss, to the Petitioner's attorney, James G. Bogle, Jr., Senior Asst. Attorney General, P.O. Box 11549, Columbia, SC, by utilizing the U.S. Postal Service, with First Class Postage affixed, this date.

2014 JAN 9 PM 3 11
FAIRFIELD COUNTY
CLERK OF COURT
BETTY JO BECKHAM

CERTIFICATE OF COUNSEL FOR APPELLANT

Counsel for Appellant certifies that this Supplemental Record on Appeal contains all material ordered to be included in this Court's Order filed April 20, 2015 and not any other material, and that this Supplemental Record on Appeal complies to the best of my ability with the April 15, 2014 order from the South Carolina Supreme Court entitled "Revised Order Concerning Personal Identifying Information and Other Sensitive Information in Appellate Court Filings."

April 23, 2015



Laura R. Baer
Appellate Defender

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

ATTORNEY FOR APPELLANT

RECEIVED
APR 23 2015
SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Fairfield County

R. Knox McMahon, Circuit Court Judge

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APR 23 2015

SC Court of Appeals

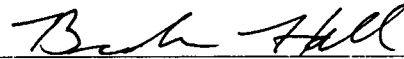
IN THE MATTER OF THE CARE AND TREATMENT OF LARRY
HENDRICKS,

APPELLANT

APPELLANT CASE NO. 2014-000205

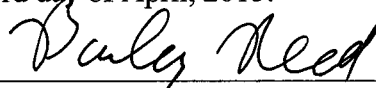
CERTIFICATE OF SERVICE

I certify that a true copy of the Supplemental Record on Appeal in the above referenced case has been served upon Deborah R.J. Shupe, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201 this 23rd day of April, 2015.



Brandon Hall
Administrative Specialist

SUBSCRIBED AND SWORN TO before me
this 23rd day of April, 2015.

 (L.S.)
Notary Public for South Carolina

My Commission Expires: October 24, 2021 .