

ORIGINAL

STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM WILLIAMSBURG COUNTY
George C. James, Jr., Circuit Court Judge

Appellate Case No. 2014-001666

THE STATE,RESPONDENT

v.

WILLIE MARION BROWN,APPELLANT.

SUPPLEMENTAL RECORD ON APPEAL

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SW - A. GOODMAN - PROFFER

1 THE COURT: Thank you, ma'am. You may
2 step down.

3 THE WITNESS: Thank you.

4 MS. BARR: The State calls Amanda Goodman.

5 THE CLERK: Place your left hand on the
6 Bible, raise your right hand.

7 WHEREUPON,

8 **AMANDA GOODMAN,**
9 having been duly sworn by the Clerk, testified as
10 follows:

11 THE CLERK: Have a seat up there in the
12 witness box.

13 **PROFFER EXAMINATION**

14 BY MS. BARR:

15 Q Amanda, state your full name for me.

16 A Amanda Lauren Goodman.

17 Q And how old are you?

18 A 19.

19 Q And what's your birthday?

20 A January 26, 1995.

21 Q Now tell the Court how it is you're related to
22 Lauren Goodman.

23 A She's my twin sister.

24 Q Okay. And your mother's name is?

25 A Marsha Brown.

SW - A. GOODMAN - PROFFER

1 Q Okay. And Marsha is the defendant Will Brown's
2 wife?

3 A Yes, ma'am.

4 Q They're separated now?

5 A Yes, ma'am.

6 Q All right. Do you have an independent
7 recollection of when they married or when they
8 started dating?

9 A Probably 2001 or so.

10 Q I'm sorry?

11 A 2001.

12 Q Is it when they married or when they started
13 dating?

14 A Probably started dating.

15 Q And do you know when they married?

16 A Was in 2002.

17 Q About 2002? All right, so if your birthday is
18 January 26th of 1995?

19 A Yes, ma'am.

20 Q And they started dating, if we assume they
21 started dating in 2001 —

22 A Uh-huh?

23 Q —then that would mean that you were about six
24 years old when they started dating; is that right?

25 A Yes.

SW - A. GOODMAN - PROFFER

1 Q And if they married in 2002 then you would have
2 been seven years old?

3 A Yes.

4 Q Okay, all right. How did you get along with the
5 defendant?

6 A It was — we had a good relationship at first,
7 but as time went on it became more aggressive and it
8 was more distance.

9 Q Okay, all right. When your mom married Will
10 where were you all living? Where did you begin to
11 live after they got married?

12 A After they were married?

13 Q Yes.

14 A In Cades.

15 Q Okay. Is that the farmhouse in Cades?

16 A Yes.

17 Q McCutcheon Road?

18 A Yes.

19 Q Okay, all right. And Amanda, you gave a forensic
20 interview to the CareHouse in Florence shortly after
21 Mr. Brown was arrested, correct?

22 A Yes.

23 Q You remember that forensic interview?

24 A Yes, ma'am.

25 Q All right. And as part of that interview you

SW - A. GOODMAN - PROFFER

1 were asked whether or not you were touched
2 inappropriately by the defendant?

3 A Yes, ma'am.

4 Q All right. Tell the Court what your response was
5 to that particular question?

6 A That I was handled by grabbing my boobs while
7 riding the four wheeler.

8 Q I'm sorry, your voice trailed off. Say it again.

9 A My breasts were being grabbed while riding the
10 four wheeler.

11 Q Who was grabbing your boobs?

12 A Will.

13 Q Will Brown?

14 A Yes, ma'am.

15 Q And you were doing what at the time?

16 A Driving the four wheeler.

17 Q And how did that come about? I mean, tell us
18 what led up to him doing that as best you can
19 remember and about how old were you when that
20 happened?

21 A I was probably 10 or 11.

22 Q Okay.

23 A And we were riding four wheelers, and it was just
24 made as a joke, just pretending like he was honking
25 a horn while he did the motion.

SW - A. GOODMAN - PROFFER

1 Q Okay. He — where was he seated on the four
2 wheeler?

3 A I was sitting in the front grabbing the handles
4 and he was sitting right behind me.

5 Q All right. And he would grab your breasts from
6 behind?

7 A Yes.

8 Q And you said he would make a noise and then make
9 a motion with his hands?

10 A Yes, ma'am.

11 Q Tell me, can you kind of show me what he did with
12 his hand. Not on yourself, but what motions he
13 took?

14 A Yes.

15 Q Like a grabbing motion?

16 A Like a grabbing.

17 Q And he had his hands on your breast at the time?

18 A Yes, ma'am.

19 Q And what noise or sound did he make?

20 A Like a horn, like a toot toot.

21 Q Okay. And did that happen on just one occasion?

22 A Yes, ma'am.

23 Q Were there ever any other occasions where he
24 touched you inappropriately or made you
25 uncomfortable?

SW - A. GOODMAN - PROFFER

1 A No.

2 Q Okay. Now I believe that you also either implied
3 or said out directly in your forensic interview that
4 your step-dad, the defendant, tend to favor your
5 twin sister?

6 A Yes, ma'am.

7 Q And you also mentioned coming across the video
8 tape?

9 A Yes, ma'am.

10 Q Tell the Court about that.

11 A So normally me and my sister would go into the
12 bedroom just to watch TV and lay on the bed, and I
13 remember walking in there and I believe she was
14 going to go get something out the kitchen and pop
15 popcorn, whatever it was. And I was going through
16 the drawer trying to find the remote and —

17 Q Okay, slow down for just a moment for me. Where
18 were you living at the time?

19 A In Kingstree, South Carolina.

20 Q Okay, what street?

21 A 308 Clearview Street.

22 Q 308 Clearview?

23 A Yes.

24 Q Clearview Street? Is that a yes?

25 A Yes, ma'am.

SW - A. GOODMAN - PROFFER

1 Q That's okay, that's fine. Do you remember when
2 you all moved from McCutcheon Road to Clearview?

3 A We were — I don't remember the exact time.

4 Q That's fine, that's fine. All right, so during
5 this time you were living in Clearview?

6 A Yes, ma'am.

7 Q And you said you went to go look for something?

8 A Yes, ma'am.

9 Q Okay, go ahead, you can continue.

10 A I was going to go look for the remote just to
11 turn the TV on, and normally the remote is sitting
12 in the night stand on the other side of the bed.
13 And whenever I opened up the drawer I saw a camera
14 and I was wondering what's on the camera. I didn't
15 know if it was our pictures or whatnot; I was just
16 curious. And I started to play it and I saw an
17 image of it was either me or my sister — I can't
18 remember who it was — but we had just gotten out
19 the shower and we were nude. And I just felt
20 disgusted and I threw it back in the drawer and
21 didn't say anything about it.

22 Q Now you testified that you were at Clearview when
23 you found the recording?

24 A Yes, ma'am.

25 Q All right. Could you make out the room of the

SW - A. GOODMAN - PROFFER

1 home where you all were living at the time that
2 recording was made?

3 A Yes.

4 Q Where was that?

5 A It was in the bathroom at the Cades house, the
6 townhouse.

7 Q On McCutcheon Road?

8 A Yes.

9 Q And do you know how old either you or Lauren
10 would have been at the time that recording was made
11 based on what you saw, the image in that recording?

12 A It was probably about 10 or 11.

13 Q Okay.

14 MS. BARR: Beg the Court's indulgence.

15 BY MS. BARR:

16 Q That's all the questions I have. Thank you,
17 ma'am. Please answer any questions that the judge
18 or defense counsel may have for you.

19 THE COURT: Mr. Lofton.

20 MR. LOFTON: If the Court please.

21 **CROSS-EXAMINATION**

22 BY MR. LOFTON:

23 Q Ms. Goodman, the camera that you say you found in
24 Will's bedside table?

25 A Yes, sir.

SW - A. GOODMAN - PROFFER

1 Q It was in a drawer?

2 A Yes, sir.

3 Q By the side of the bed?

4 A Yes, sir.

5 Q And was that a camera that your family used to
6 make home movies, home videos?

7 A No, sir, I'd never seen it before.

8 Q You'd never seen the camera before? Okay. After
9 you found this video did you tell your mom you found
10 this video and what was it all about?

11 A No, sir.

12 Q Okay. You just looked at it and you saw what you
13 told the Court images of either you or your sister
14 getting out of the shower?

15 A Yes, sir.

16 Q Okay. And that was all that was on there?

17 A That's all that I saw, yes, sir.

18 Q Okay. And then you put the camera back in the
19 drawer?

20 A Yes, sir.

21 Q Never said anything to anybody about it?

22 A No, sir.

23 Q And you indicated in response to the Solicitor's
24 question that you thought you were around 10 or 11
25 years old?

SW - A. GOODMAN - PROFFER

1 A Yes, sir.

2 Q So when y'all moved into Kingstree you were
3 actually ten years old, right?

4 A Yes, sir.

5 Q Y'all moved in in 2005 I believe?

6 A I believe so.

7 Q Okay. So if the pictures on the camera indicated
8 that you were 10 or 11 years old, it'd been closer
9 to 10 or 9; would it not?

10 A Yes, sir.

11 Q Okay. 'Cause you indicated it was taken out at
12 the Cades house?

13 A Yes, sir.

14 Q And other than finding that video that you have
15 indicated, you also testified that on one occasion
16 you and Will were riding a four wheeler together?

17 A Yes, sir.

18 Q Okay. And on one occasion Will reached around
19 and grabbed you on the breast and said toot toot?

20 A Yes, sir.

21 Q That one time, and where was that?

22 A In the farmhouse in Cades.

23 Q And where was Lauren and your mother at that
24 time?

25 A I believe they were at the house.

SW - A. GOODMAN - PROFFER

1 Q Okay. Y'all, you and Lauren and Will had all
2 been riding four wheelers together, right?

3 A Yes, sir.

4 Q And that wasn't something out of the ordinary,
5 was it?

6 A No, sir.

7 Q Y'all went out and did that a lot?

8 A Yes, sir.

9 Q Okay. And you indicated it was really kind of
10 like a joke?

11 A Yes, sir.

12 Q Okay. I don't have anything further. Thank you.

13 THE COURT: Redirect?

14 MS. BARR: Just a couple.

15 **REDIRECT EXAMINATION**

16 BY MS. BARR:

17 Q Amanda, do you have an independent recollection
18 of the defendant videotaping you when you got out of
19 the shower at age 9, 10, or 11?

20 A No, ma'am.

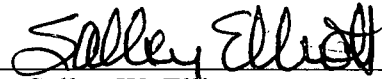
21 Q And I missed the answer to one of the last
22 questions in terms of where your sister and your
23 mother were at the time the incident happened on the
24 four wheeler. Where were they?

25 A I believe they were at the house.

CERTIFICATE OF COUNSEL

Counsel for Appellant certifies that this Supplemental Record on Appeal contains all material proposed to be included by any of the parties and not any other material.

BY:

A handwritten signature in black ink, appearing to read "Salley Elliott", written over a horizontal line.

Salley W. Elliott
S.C. Bar No: 1871

June 1, 2015