

STATE OF SOUTH CAROLINA  
In the Supreme Court

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CERTIORARI TO ORANGEBURG COUNTY  
Court of Common Pleas

Maité Murphy, Post-Conviction Relief Court Judge

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Appellate Case No. 2014-002472

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DIDIER VAN SELLNER,

Petitioner,

vs.

THE STATE OF SOUTH CAROLINA,

Respondent.

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**BRIEF OF RESPONDENT**

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## STATEMENT OF ISSUE ON APPEAL

Is there evidence of probative value to support the post-conviction relief court's finding that plea counsel was not ineffective in advising Petitioner to plead guilty to armed robbery, where Petitioner presented an elderly bank teller with a note indicating that he had a gun and would shoot her if she did not comply with his demands, causing her to reasonably fear for her life, and Petitioner failed to meet his burden of proof of showing his conduct did not comport with the armed robbery statute?

## STATEMENT OF THE CASE

On September 8, 2011, Petitioner robbed an Orangeburg branch of the South Carolina Bank and Trust by handing an elderly teller a note stating he had a gun and would shoot her if she did not give him three thousand dollars. Law enforcement arrested Petitioner shortly thereafter and Petitioner gave a statement implicating himself in the bank robbery.

Following his arrest, Margaret E. Hinds, Esquire, of the Orangeburg County Public Defender's Office was appointed to represent Petitioner. On March 6, 2012, Petitioner appeared before the Honorable Edgar W. Dickson, where he waived presentment to the Orangeburg County Grand Jury and pled guilty to armed robbery. Judge Dickson sentenced Petitioner to twelve years imprisonment. Petitioner did not appeal his conviction or his sentence.

On February 11, 2013, Petitioner filed a timely application for post-conviction relief. In his application, Petitioner alleged he was being held in custody unlawfully based on the following allegations:

1. "Ineffective unprofessional counsel;"
  - a. Counsel failed to explain all the elements of the charge in detail.
2. Involuntary Guilty Plea; and
  - a. Counsel "pressured me to accept plea."
3. "I was never armed, nor possessed any object or device that could be considered a weapon . . . So this bank robbery could not be in any way, shape, form, or action be considered a [sic] armed robbery."

Respondent made its Return on April 24, 2013, requesting an evidentiary hearing.

An evidentiary hearing on Petitioner's application was held May 29, 2013, at the Dorchester County Courthouse before the Honorable Maité Murphy. Petitioner was present at the hearing alongside his counsel, Michael R. Culler, Jr., Esquire. Petitioner

testified on his own behalf and presented testimony from plea counsel, Margaret E. Hinds, Esquire. After a review of all materials presented, post-conviction relief court denied and dismissed Petitioner's application by written order signed September 29, 2014.

Petitioner filed a Notice of Appeal on November 18, 2014. Thereafter, Petitioner filed a Petition for Writ of Certiorari on May 12, 2015. The State filed its Return to the Petition on July 17, 2015. Petitioner filed a Reply on July 27, 2015. This Court granted certiorari on October 21, 2015. Petitioner filed his Brief on December 21, 2015. This Brief of Respondent follows.

## ARGUMENT

**There is evidence of probative value to support the post-conviction relief court's finding plea counsel was not ineffective in advising Petitioner to plead guilty to armed robbery, where Petitioner presented an elderly bank teller with a note indicating that he had a gun and would shoot her if she did not comply with his demands, causing her to reasonably fear for her life, and Petitioner failed to meet his burden of proof of showing his conduct did not comport with the armed robbery statute.**

Petitioner avers the post-conviction relief court committed reversible error in denying his application for post-conviction relief. Petitioner asserts trial counsel was ineffective for advising him to waive presentment to the grand jury and plead guilty to armed robbery because he “merely handed the bank clerk a note stating that he would ‘shoot’ but had no representation of a weapon.” Petitioner contends his actions do not comport with the South Carolina armed robbery statute because he made no physical representation of a deadly weapon, and therefore, he did not satisfy the requisite elements to support an armed robbery conviction under S.C. Code. Ann. §16-11-330. Petitioner further argues that “[h]ad he gone to trial [he] would have been entitled to a direct verdict on the charge of armed robbery and could have requested an instruction on the lesser included offense of common law robber, also known as strong arm robbery.” (BOP p. 3). However, the post-conviction relief court properly denied Petitioner's application, finding Petitioner failed to meet his requisite burden of proof. There is evidence of probative value to support the post-conviction relief court's findings.

### **Standard of Review**

The post-conviction relief court's findings of fact and conclusions of law receive great deference during appellate review. Caprood v. State, 338 S.C. 103, 109, 525 S.E.2d 514, 517 (2000). The proper standard of review of a post-conviction relief decision is whether “*any* evidence of probative value” exists to sustain the lower court's findings.

Cherry v. State, 300 S.C. 115, 119, 386 S.E.2d 624, 626 (1989) (emphasis added). The reviewing court will affirm if there is any evidence to support the post-conviction relief court's findings. Moore v. State, 399 S.C. 641, 646, 732 S.E.2d 871, 873 (2012). This Court will reverse the post-conviction relief court if it is controlled by an error of law. Suber v. State, 371 S.C. 554, 558-59, 640 S.E.2d 884, 886 (2007) (Sheppard v. State, 357 S.C. 646, 651, 594 S.E.2d 462, 465 (2004)).

In a post-conviction relief action, an applicant bears the burden of proving the allegations in his or her application. Butler v. State, 286 S.C. 441, 334 S.E.2d 813 (1985). Where the application alleges ineffective assistance of counsel as a ground for relief, the applicant must prove that "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." Strickland v. Washington, 466 U.S. 668 (1984); Butler, 286 S.C. 441, 334 S.E.2d 813.

The proper measure of performance is whether an attorney provided representation within the range of competence required in criminal cases. Courts presume that counsel rendered adequate assistance and made all significant decisions in the exercise of reasonable professional judgment. Strickland, 466 U.S. 668. An applicant must overcome this presumption in order to receive relief. Cherry, 300 S.C. 115, 386 S.E.2d 624.

The reviewing court applies a two-pronged test in evaluating allegations of ineffective assistance of counsel, and both prongs must be established by an applicant to receive relief. Strickland, 466 U.S. 668. First, an applicant must prove that counsel's performance was deficient. Under this prong, the court measures an attorney's performance by its "reasonableness under professional norms." Cherry, 300 S.C. at 117, 386 S.E.2d at 625, citing Strickland, 466 U.S. 668. Second, counsel's deficient

performance must have prejudiced the applicant such that “there is a reasonable probability that, but for counsel’s unprofessional errors, the result of the proceeding would have been different.” Cherry, 300 S.C. at 117-18, 386 S.E.2d at 625.

With respect to guilty plea counsel, the applicant must show that there is a reasonable probability that, but for counsel’s alleged errors, he would not have pled guilty and would have insisted on going to trial. Hill v. Lockhart, 474 U.S. 52 (1985).

These standards do not establish mechanical rules; the ultimate focus of inquiry must be on the fundamental fairness of the proceeding whose result is being challenged. A court need not first determine whether counsel’s performance was deficient before examining the prejudice suffered by the defendant as a result of the alleged deficiencies. If it is easier to dispose of an ineffectiveness claim on the ground of lack of sufficient prejudice, that course should be followed. Strickland, 466 U.S. 668.

#### **Discussion / Analysis**

On September 8, 2011, Petitioner entered the South Carolina Bank and Trust and handed Ms. Hildebrandt, an elderly teller at the bank, a note that he had a gun and demanding she give him three thousand dollars in used bills without any dye packs or he would shoot her. (App. pp. 13, 46, 56). Specifically, Petitioner handed Ms. Hildebrandt a note stating, “freeze this is [a] stick up, **I have a gun**. Please give me three thousand dollars in large, loose bills. No games or **I’ll shoot**.” (App. p. 56) (emphasis added). Ms. Hildebrandt gave Petitioner four hundred and ninety-two dollars before Petitioner became impatient and fled the bank. (App. pp. 13-14, 17). A short time later, law enforcement located Petitioner at a local motel still wearing the same clothing as he had on during the robbery. (App. p. 14). Law enforcement placed Petitioner under arrest and Petitioner gave

statements admitting his guilt. (App. p. 14). Petitioner further admitted his involvement to other local enforcement officials and FBI agents. (App. p. 14)

Prior to this incident, Petitioner had been convicted in New York for various robbery and drug-related offenses. (App. pp. 14, 57). Additionally, Petitioner served eight and a half years in New Jersey for attempted murder. (App. p. 59). Petitioner's prior record clearly made him eligible for an enhanced life without parole sentence pursuant to S.C. Code Ann. § 17-25-45 upon conviction of another serious or most serious offense, such as armed robbery.

On March 6, 2012, Petitioner waived presentment to the Orangeburg County Grand Jury and pled guilty to armed robbery. (App. p. 13). Although Petitioner denied having a weapon during the robbery, he never denied that he made the bank teller believe he was armed with a deadly weapon. (App. pp. 11, 18-19). Petitioner also fully acknowledged he was guilty of the facts giving rise to the charge, including threatening an elderly teller with a note that he had a deadly weapon and would shoot her if she did not comply with his demands. (App. pp. 17-18). Counsel testified similarly, stating Petitioner "never denied any responsibility for his actions . . . He has admitted it from day one." (App. p. 18). Counsel further testified that although Petitioner told her he did not have a weapon, he led Ms. Hildebrandt to believe he did indeed have a weapon. (App. p. 18). Counsel further noted it was not Petitioner's intent to harm anyone, but he had gotten himself into a situation where he needed to come into some money quickly to pay a debt and avoid harm to him or his wife. (App. pp. 18-19).

Crucially, Petitioner never testified as to the location of his hands. He never testified as to whether he had anything in his pockets or under his clothing that could have created the appearance of a weapon and led Ms. Hildebrandt to reasonably believe

Petitioner was armed. Rather, Petitioner stated he had “nothing in [his] hand.” (App. p. 54). The investigator for the bank testified that this robbery was a traumatic event for Ms. Hildebrandt, who has since retired from the bank, and Petitioner showed neither Ms. Hildebrandt nor the other employees any mercy. (App. pp. 13, 15).

In this post-conviction relief action, Petitioner now asserts counsel was ineffective for advising him to plead guilty to armed robbery when his conduct did not satisfy the statutorily required elements. Petitioner alleges counsel was ineffective for failing to explain the elements of armed robbery in detail and for informing him that his conduct comported with the armed robbery statute. (App. p. 30). Petitioner also alleges counsel was ineffective for “pressur[ing] [Petitioner] to accept plea . . . because of [a] ten year prison sentence from third-degree robbery in New York State.” (App. pp. 30-31). Petitioner contends the post-conviction relief court erred in finding that plea counsel was not ineffective and asserts this Court should reverse the lower court.

In its Order of Dismissal, the post-conviction relief court found Petitioner failed to satisfy his burden of proof establishing any deficiency on the part of plea counsel in advising Petitioner to plead guilty to armed robbery. (App. p. 81). The post-conviction relief court also noted Petitioner readily concedes that he entered the bank and passed the teller a note demanding money and threatened to shoot her. (App. p. 81). The post-conviction relief court found Petitioner’s conduct comported to the armed robbery statute by alleging he was armed with a deadly weapon. (App. p. 81). The post-conviction relief court found Petitioner failed to establish either deficiency of plea counsel or any resulting prejudice and denied relief. (App. pp. 81-82). These findings are supported by ample evidence in the record and should be affirmed. See Cherry, 300 S.C. at 119, 386 S.E.2d at 626.

At the evidentiary hearing, counsel testified that prior to her appointment, Petitioner had already given multiple statements admitting to the conduct giving rise to the charge. (App. p. 65). Because of these freely given and voluntary statements, counsel testified that she attempted to negotiate a favorable plea offer with the State to avoid a hefty term of imprisonment, including a sentence of life without parole based on Petitioner's prior record. (App. p. 65). She further testified that she discussed the elements of armed robbery with Petitioner and that the representation of a weapon was satisfied through his conduct that twice referenced his possession of a weapon. (App. pp. 66, 69, 70). Additionally, Petitioner testified he was aware that if he did not plead guilty, the State could seek life without parole based on his prior convictions and that he discussed this with counsel. (App. pp. 47-48, 57). Petitioner did not testify that his hands were not in his pockets or behind his back, that he did not have any bulges in his clothing, that he was not reaching inside of a coat pocket, or that there was no physical representation to make Ms. Hildebrandt believe he had a weapon. He merely alleged that he did not have a weapon. Petitioner failed to establish that there was no physical representation causing Ms. Hildebrandt to reasonably believe that Petitioner was armed. Petitioner failed to meet his requisite burden of proof necessary for post-conviction relief.

The offense of armed robbery is the commission of a robbery by a person either armed with a deadly weapon or pretending to be armed with a deadly weapon while using a representation of one or while using any object reasonably perceived as one. State v. Moore, 374 S.C. 468, 476, 649 S.E.2d 84, 88 (Ct. App. 2007); see S.C. Code Ann. § 16-11-330(A) ("A person who commits robbery while armed with a pistol, dirk, slingshot, metal knuckles, razor, or other deadly weapon, or while alleging, either by action or words, he was armed while using a representation of a deadly weapon or any

object which a person present during the commission of the robbery reasonably believed to be a deadly weapon, is guilty of a felony[.]”). Thus, a defendant may be convicted of armed robbery if the jury concludes the defendant alleged during the robbery he was armed under the requisite statutory conditions without having to conclude the defendant was actually armed. State v. Jones, 342 S.C. 248, 253, 536 S.E.2d 396, 398 (Ct. App. 2000). The issue of whether or not a deadly weapon was used during a robbery is a question of fact for the jury to resolve. State v. Simmons, 360 S.C. 33, 43-44, 599 S.E.2d 448, 453 (2004).

In the similar case of State v. Jones, Jones entered a convenience store and gave the store clerk a note indicating it was a stickup and demanding the surrender of all the money. Id., 342 S.C. at 250, 536 S.E.2d at 397. The clerk initially thought the note was a joke until he noticed Jones had his left hand concealed in his jacket pocket. Id. at 251, 536 S.E.2d at 397. The clerk then gave Jones the money from the store register without ever actually seeing a weapon because he feared being shot. Id. On appeal, the Court of Appeals looked to the indictment, which alleged Jones committed the robbery while armed with a deadly weapon, and concluded the evidence presented conflicted with the material allegations of the indictment. Id. at 253-254, 536 S.E.2d at 398-399. Therefore, the Court reversed Jones’s conviction and found he was entitled to a directed verdict on the armed robbery charge as indicted. Id. However, the Court specifically found Jones could be re-indicted for armed robbery with a proper indictment correctly charging Jones with committing the robbery while alleging to be armed with a deadly weapon while using a representation of a deadly weapon or any object reasonably believed to be a deadly weapon. Id. at 254, n. 2, 536 S.E.2d at 399.

Likewise, although not controlling, the Georgia Court of Appeals addressed another very similar case in Martin v. State, 264 Ga. App. 813, 592 S.E.2d 483 (Ga. Ct. App. 2003).<sup>1</sup> In Martin, Martin entered a convenience store, asked the clerk for cigarettes, and then demanded the money in the cash register. Id. at 813, 592 S.E.2d at 484. The clerk surrendered the money after noticing Martin had his hand concealed in his coat pocket like he was armed with a gun. Id. However, Martin never verbally threatened to shoot, kill, or harm the clerk during the robbery. Id. Subsequently, Martin was charged with armed robbery and convicted. Id. at 814, 592 S.E.2d at 484. On appeal, the Georgia Court of Appeals affirmed his conviction finding the evidence of armed robbery was sufficient because the clerk perceived Martin had a gun during the robbery based on Martin's actions. Id. at 814, 592 S.E.2d at 485.

In support of his argument, Petitioner cites to State v. Muldrow, 348 S.C. 264, 559 S.E.2d 847 (2002). In Muldrow, the defendant entered a convenience store to purchase a pack of cigarettes and handed the clerk a note, stating that he would shoot her if she did not give him all of the money in the register. Id. at 267, 559 S.E.2d at 848-49. The clerk asked the defendant if he was serious, and he replied "yes" and once again threatened to shoot her. Id. at 267, 559 S.E.2d at 849. The defendant was indicted for armed robbery and proceeded to trial. Id. at 266, 559 S.E.2d at 848. After the State's case, the defendant moved for a directed verdict, arguing that there was no evidence that he was armed with a deadly weapon or that he used a representation of a deadly weapon as required under the statute. Id. at 266, 559 S.E.2d at 849. The trial court denied his

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<sup>1</sup> Importantly, Georgia's armed robbery statute is also similar to the armed robbery statute in South Carolina. See Ga. Code Ann. § 16-8-41(a) ("A person commits the offense of armed robbery when, with intent to commit theft, he or she takes property of another from the person or the immediate presence of another by use of an offensive weapon, or any replica, article, or device having the appearance of such weapon." (emphasis added)).

motion for a directed verdict, but agreed to charge the lesser-included offense of strong arm robbery. Id. The jury convicted the defendant of armed robbery. Id. at 267, 559 S.E.2d at 848. On appeal, the defendant argued his motion for a directed verdict should have been granted because there was no evidence he was armed with a deadly weapon or that he used a representation of a deadly weapon as required by the statute. Id. at 266, 559 S.E.2d at 849. Based on these facts, this Court held that words alone were not sufficient under S.C. Code Ann. § 16-11-330(A) and in order to establish armed robbery, the State must show evidence corroborating the allegation of being armed, for example a physical representation of a deadly weapon. Id. at 269, 559 S.E.2d at 849-50.

Petitioner's case is distinguishable from Muldrow, as Petitioner knowingly pled guilty to armed robbery and specified in his note that he actually had a weapon. (App. pp. 12-13, 56). Specifically, Petitioner testified his note said, "Freeze this is [a] stick up, **I have a gun**. Please give me three thousand dollars in large, loose bills. No games or **I'll shoot**." (App. p. 56) (emphasis added). Furthermore, Petitioner never denied he made Ms. Hildebrandt believe he had a weapon. (App. p. 18). Petitioner never testified there was no physical representation of a weapon. The record is silent as to the placement of Petitioner's hands, whether his pockets were bulging, or whether Petitioner reached inside a coat pocket for something, all which could reasonably make Ms. Hildebrandt believe he had a weapon. Additionally, Petitioner never presented any evidence he made no action to indicate he had a weapon at the time of the robbery, such as that his hands were visible or he had no bulges in his clothing, other than asserting he made no such action after he had already pled guilty to armed robbery.<sup>2</sup> (App. p. 54). See State v.

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<sup>2</sup> Petitioner argues the evidence indicated that he presented a note that threatened to shoot the teller but had no physical representation of a deadly weapon or any object that a person might reasonably believe to be a deadly weapon. The testimony at the plea hearing did indicate that Petitioner presented a threatening note

Bennett, 328 S.C. 251, 493 S.E.2d 845(S.C. 1997), appeal after new sentencing hearing, 369 S.C. 219, 632 S.E.2d 281, (finding that a hand or fist may be “deadly weapon” for purposes of armed robbery and whether defendant's hand or fist was deadly weapon was question of fact in armed robbery prosecution given disparity in size between victim and defendant). Similarly, Petitioner did not present evidence to support his allegation that no one felt that he was armed at the time of the robbery. (App. p. 54). It is Petitioner’s burden to establish that he is entitled to relief, and as articulated above, he has failed to do so.

Based on the foregoing, Petitioner failed to establish that he is entitled to post-conviction relief. The lower court properly denied Petitioner relief.

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to the bank teller but made **no mention** of whether or not there were any physical representation that might have lead Ms. Hildebrandt to reasonably believe that Petitioner was armed. As this was a guilty plea, no testimony was presented from Ms. Hildebrandt or any other witnesses present during the robbery.

**CONCLUSION**

For all the foregoing reasons, the post-conviction relief court's findings should be affirmed.

Respectfully submitted,

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March 10, 2016

STATE OF SOUTH CAROLINA  
In the Supreme Court

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CERTIORARI TO ORANGEBURG COUNTY  
Court of Common Pleas

Maité Murphy, Post-Conviction Relief Court Judge

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Appellate Case No. 2014-002472

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DIDIER VAN SELLNER,

Petitioner,

vs.

THE STATE OF SOUTH CAROLINA,

Respondent.

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**PROOF OF SERVICE**

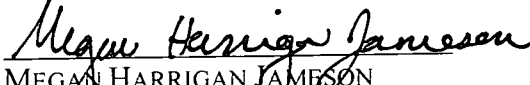
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I, Megan Harrigan Jameson, certify that I have served the within **Brief of Respondent** on Petitioner by depositing two copies of the same in the United States mail, postage prepaid, addressed to:

Laura Baer, Esquire  
S.C. Commission on Indigent Defense  
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I further certify that all parties required by Rule to be served have been served.

This 10<sup>th</sup> day of March, 2016.

  
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**RECEIVED**

MAR 10 2016

**SC SUPREME COURT**

ALAN WILSON  
ATTORNEY GENERAL

March 10, 2016

The Honorable Daniel E. Shearouse  
Clerk, South Carolina Supreme Court  
Post Office Box 11330  
Columbia, South Carolina 29211

**Re: Didier Van Sellner v. State of South Carolina**  
**Appellate Case No. 2014-002472**

Dear Mr. Shearouse:

I am enclosing the original and thirteen copies of the Brief of Respondent in the above-mentioned post-conviction relief appeal.

Sincerely,

Megan Harrigan Jameson  
Assistant Attorney General  
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MHJ  
Enclosures

cc: Laura Baer, Esquire  
Trisha Allen, Victim Services