STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

On Writ of Certiorari to the Court of Appeals
Appeal from York County
Honorable Lee S. Alford, Circuit Court Judge
Appellate Case No. 2016-001501

THE STATE,

Respondent,

vs.

JEFFREY DAVIS,

Petitioner.

RETURN TO PETITION FOR WRIT OF CERTIORARI

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STATEMENT OF ISSUE ON CERTIORARI

The Court of Appeals properly affirmed the trial court's sentence of life imprisonment without parole pursuant S.C. Code Ann. § 17-25-45 after Petitioner was convicted of a third serious offense during his lifetime, and the enhancement of Petitioner's sentence based on his two prior drug convictions for serious offenses did not render his life without parole sentence unconstitutional in any way.

STATEMENT OF THE CASE

Procedural History

During its February 2013 term, the York County Grand Jury indicted Petitioner for distribution of crack cocaine following Petitioner's sale of crack cocaine during a controlled buy. On May 6, 2013, the State served Petitioner with notice of intent to seek life without parole pursuant to S.C. Code Ann. § 17-25-45 based on his two prior serious convictions for trafficking in crack cocaine and distribution of crack cocaine within proximity of a school. On June 4, Petitioner was tried in his absence before the Honorable Lee S. Alford, circuit court judge, and a jury. On June 5, 2013, the jury convicted Petitioner as indicted. Judge Alford imposed a sealed sentence to be handed down when Petitioner was apprehended.

On December 4, 2013, Petitioner appeared before Judge Alford for the unsealing of his sentence. Judge Alford unsealed his sentence and imposed a mandatory life without parole term of imprisonment pursuant to S.C. Code Ann. § 17-25-45. Petitioner filed a timely notice of appeal.

The Court of Appeals affirmed Petitioner's conviction and sentence in an unpublished opinion without oral argument. State v. Jeffrey Davis, Op. No. 2016-UP-193 (Ct. App. filed May 11, 2016). Thereafter, Petitioner petitioned for rehearing on May 23, 2016. The Court of Appeals issued an order denying the petition for rehearing on June 23, 2016. On July 19, 2016, Petitioner filed a petition for a writ of certiorari and accompanying appendix with this Court.

Factual History

The York County Multi-Jurisdictional Drug Enforcement Unit (hereinafter "DEU"), led by Commander Rayford Ervin and comprised of various members of law enforcement from agencies across the county, was created to combat the prevalence of illicit drugs throughout the

York County. (R. p. 45; Supp. R. 2-4). Tanya Ervin, an eleven year veteran of the Fort Mill Police Department, was a member of the DEU assigned the Rock Hill DEU office in August of 2012. (R. pp. 44-46, Supp. R. 1, 4). Ervin was selected to participate in an operation targeting drug sales in the valley area of the City of York, an area known for rampant drug sales and use. (R. p. 46, Supp. R. 4). She was selected for this particular assignment because she had not previously worked in the area and would be unknown to the drug dealers and community residing in the valley area. (Supp. R. p. 4). Ervin was tasked with driving an unmarked police vehicle while accompanied by an informant and recording the transactions with a hidden camera she would be wearing while making controlled buys of narcotics. (R. p. 47).

On August 16, 2012, Ervin was assigned to work with Shari Jennings, a paid informant. (R. pp. 46-48, 61). Jennings, a recovered crack addict, previously lived in the valley area and was a former participant in the area's drug scene. (R. pp. 59-60, 64-65). Jennings was on probation for third degree burglary and became an informant to help pay her probation costs. (R. pp. 65, 72, 73). However, she had no pending charges or other probationary sentences. (R. pp. 66-67, 70). She was not promised any assistance with completing her probation, but was paid eighty dollars per buy. (R. pp. 59, 66-67).

Jennings and Ervin met at the DEU office located within the Moss Justice Center. (R. p. 48). Before leaving the office, DEU officers searched the unmarked police vehicle and Jennings; neither yielded any contraband. (R. pp. 57, 62, 75-76). Jennings was provided forty dollars in marked bills to use in the controlled buy, and Ervin was equipped with surveillance gear so that any transaction could be recorded. (R. pp. 47, 49-50, 52, 56, 62, 74). The pair left the DEU office in the early evening and headed towards the valley area. (R. pp. 48, 61).

Once in the valley, Jennings saw Petitioner, whom she had known for approximately two years. (R. pp. 48, 61). Jennings and Petitioner previously used crack together daily during the year she resided in the valley. (R. pp. 64, 71). Petitioner recognized Jennings in the unmarked car and called out to her, using her nickname, "Cricket." (R. pp. 61-62). Petitioner approached the car and Jennings introduced Ervin as her aunt. (R. pp. 48, 51, 62-63). Jennings asked Petitioner if she could purchase forty dollars' worth of crack from him. (R. pp. 48, 51, 61, 63). Petitioner instructed Jennings to drive around the block and when she came back, he would have the crack for her. (R. p. 63). Jennings and Ervin complied and shortly thereafter, Petitioner returned with the drugs. (R. p. 63). Jennings argued to Petitioner that it looked like only twenty dollars' worth of crack, not the forty dollars' worth for which she had paid (R. pp. 52, 63-64). Petitioner responded that the crack he provided was "fire," indicating it was very high quality, so it was worth the purchase price. (R. pp. 52, 64). Jennings gave Petitioner the forty dollars in marked bills provided by the DEU. (R. p. 64). When Petitioner left, Jennings gave the bag of crack to Ervin, who sealed it into an evidence bag. (R. pp. 52, 53-54; 55, 69). The entire transaction was recorded by the camera Ervin was operating. (R. pp. 48-49).

Ervin drove immediately back to the DEU office. (R. pp. 57, 68, 77-78). DEU officers again searched Jennings and the car for contraband and none was found. (R. p. 78). Jennings provided a statement to DEU officers regarding the transaction. (R. p. 68). DEU officers watched the video of the transaction, and Commander Ervin instantly recognized Petitioner from numerous previous interactions with him in the valley. (R. pp. 84-85). DEU officers created a six-person lineup, including Petitioner's photograph and five other people who resembled Petitioner; officers showed the line up to Jennings, who identified Petitioner as the person who

sold her crack. (R. p. 68). Thereafter, DEU officers obtained a warrant for Petitioner's arrest, and the York County Grand Jury indicted Petitioner for distribution of crack cocaine. (R. p. 169-70).

On May 6, 2013, the State served Petitioner with its notice of intention to seek life without parole based on his two previous serious convictions pursuant to S.C. Code Ann. § 17-25-45. (R. pp. 6, 11). Petitioner was also put on notice of his trial date at this hearing. (R. p. 6). On June 4, 2013, the State called Petitioner's case for trial and Petitioner failed to appear. (R. p. 6). His counsel informed the trial court he had spoken to Petitioner that morning and informed him the trial would begin that day, but subsequent attempts to reach him were unsuccessful. (R. pp. 8-9). The trial court found Petitioner had sufficient notice of his trial date and allowed the trial to proceed in his absence. (R. pp. 27-29). Following the two day trial, the jury convicted Petitioner as indicted. The trial court sealed Petitioner's sentence. (R. pp. 114-27).

On December 4, 2013, Petitioner appeared before the trial court for sentencing alongside defense counsel. The trial court unsealed Petitioner's sentence and sentenced him to life without parole pursuant to S.C. Code Ann. § 17-25-45 over defense counsel's objection. Defense counsel argued Petitioner's sentence was unconstitutional because his two underlying "serious" offenses qualifying for mandatory life without parole were both drug offenses, rendering the punishment cruel and unusual. Defense counsel asserted the trial court should undergo a proportionality analysis and determine that a life imprisonment sentence was inappropriate for Petitioner because his underlying "serious" offenses were both drug related. (R. pp. 131-68). The trial court disagreed, citing South Carolina case law explicitly authorizing life imprisonment without parole based on drug offenses.

ARGUMENT

The Court of Appeals properly affirmed the trial court's sentence of life imprisonment without parole pursuant S.C. Code Ann. § 17-25-45 after Petitioner was convicted of a third serious offense during his lifetime, and the enhancement of Petitioner's sentence based on his two prior drug convictions for serious offenses did not render his life without parole sentence unconstitutional in any way.

Petitioner contends the Court of Appeals erred in affirming the trial court's imposition of a life without parole sentence pursuant to S.C. Code Ann. § 17-25-45 upon his conviction of a third serious offense. Specifically, Petitioner asserts his sentence of life imprisonment without the possibility of parole constitutes cruel and unusual punishment under the Eighth Amendment to the United State Constitution because his sentence enhancement based exclusively on his two prior serious drug convictions.

To the contrary, the Court of Appeals properly held the trial court properly sentenced Petitioner pursuant to S.C. Code Ann. § 17-25-45 because Petitioner's two prior convictions for serious offenses constituted qualifying prior convictions for enhancement purposes under the statute. Furthermore, the enhancement of Petitioner's sentence with the prior convictions did not offend modern standards of decency and did not constitute cruel and unusual punishment. Petitioner's convictions and sentence should be affirmed. Therefore, the Court of Appeals correctly affirmed the trial court's sentence. Petitioner's petition for a writ of certiorari should be denied.

A. Propriety of the Sentencing Enhancement

In criminal cases, the appellate court sits to review errors of law only. State v. Jacobs, 393 S.C. 584, 586, 713 S.E.2d 621, 622 (2011). "[T]he trial court's ruling will not be disturbed absent a prejudicial abuse of discretion amounting to an error of law." State v. Sheldon, 344 S.C. 340, 342, 543 S.E.2d 585, 585-86 (Ct. App. 2001). An abuse of discretion occurs where the trial

court's conclusions lack evidentiary support or is controlled by an error of law. State v. Elders, 386 S.C. 474, 480, 688 S.E.2d 857, 861 (Ct. App. 2010).

Generally, the trial court has broad discretion in imposing a sentence within the statutory limits. State v. Sidell, 262 S.C. 397, 398, 205 S.E.2d 2, 3 (1974). "A judge or other sentencing authority is to be accorded very wide discretion in determining an appropriate sentence, and must be permitted to consider any and all information that reasonably might bear on the proper sentence for the particular defendant, given the crime committed." State v. Hicks, 377 S.C. 322, 325, 659 S.E.2d 499, 500 (Ct. App. 2008). Appellate courts typically only interfere in a trial judge's discretionary sentencing decision in rare and unusual circumstances. State v. Ferguson, 221 S.C. 300, 307, 70 S.E.2d 355, 358 (1952).

Pursuant to S.C. Code Ann. § 17-25-45, once the State properly seeks life imprisonment without parole based on a prior conviction for either one most serious offense, two serious offenses, or a combination thereof, the trial court has no discretion in sentencing and must sentence a defendant to a term of imprisonment of life without the possibility of parole upon conviction of the charged offense. Trafficking in cocaine and distribution of crack cocaine within proximity of a school are both classified as serious offenses under the statute. S.C. Code Ann. § 17-25-45(C)(2)(b) (2003 & Supp. 2012). Distribution of crack cocaine–third offense carries a maximum penalty of thirty years, rendering it a qualifying offense for life imprisonment without parole pursuant to S.C. Code Ann. § 17-25-45(C)(2)(a). S.C. Code Ann. § 44-53-375(B)(3).

Prior to the underlying conviction subject to this appeal, Petitioner was convicted of two prior "serious" offenses–trafficking in cocaine and distribution of crack cocaine within proximity of a school. Despite Petitioner's repeated protestations that these prior offenses were merely drug related, and thus, should not give rise to life imprisonment without parole, both are nonetheless

qualifying serious offenses as enumerated in S.C. Code Ann. § 17-25-45(c)(2)(b). Therefore, the trial court properly sentenced Petitioner to a term of life imprisonment without the possibility of parole as was mandated by S.C. Code Ann. § 17-25-45(c)(2)(a) upon his conviction for distribution of crack cocaine–third offense. The trial court committed no statutory error in enhancing Petitioner's sentence under the clear and unambiguous requirements of S.C. Code Ann. § 17-25-45. Petitioner's convictions and sentence should be affirmed.

B. Sentence Enhancement and Cruel and Unusual Punishment

The Eighth Amendment of the United States Constitution prohibits the imposition of cruel and unusual punishment. U.S. Const. amend. VIII. However, the Eighth Amendment only forbids extreme sentences that are grossly disproportionate to the crime. Harmelin v. Michigan, 501 U.S. 957, 1001 (1991). What constitutes cruel and unusual punishment is an evolving standard and involves looking at how society presently views a particular punishment. State v. Wilson, 306 S.C. 498, 509-10, 413 S.E.2d 19, 26 (1992). "The Amendment must draw its meaning from the evolving standards of decency that mark the progress of a maturing society." Trops v. Dulles, 356 U.S. 86, 101 (1958).

The clearest and most reliable expression of society's contemporary values is derived from legislation enacted by this country's legislatures. State v. Pittman, 373 S.C. 527, 563, 647 S.E.2d 144, 162 (2007). However, a reviewing court's own judgment should also be employed by asking whether there is reason to disagree with the judgment reached by the citizenry and the legislature. Id. at 563, 647 S.E.2d at 163. In order to establish that evolving standards of decency preclude a particular punishment, the defendant bears the heavy burden of showing our culture and laws have emphatically and virtually universally rejected a particular sentencing practice. Id. at 565, 647 S.E.2d at 164. "It is not the burden of the state to establish a national consensus

approving what their citizens have voted to do; rather, it is the heavy burden of the defendant to establish a national consensus against it." State v. Williams, 380 S.C. 336, 347, 669 S.E.2d 640, 646 (Ct. App. 2008).

In State v. Williams, a case strikingly similar to the case at bar, this Court determined that enhancement of a sentence under S.C. Code Ann. § 17-25-45 based on prior "serious" drug convictions did not constitute cruel and unusual punishment and did not offend the Eighth Amendment's protections against cruel and unusual punishment. 380 S.C. 336, 669 S.E.2d 640 (Ct. App. 2008). In Williams, Williams was convicted of distribution of crack cocaine and distribution of crack cocaine within proximity of a school following an undercover narcotics buy using a confidential informant Williams knew. Id. Based on two prior serious convictions, both of which were drug related, the State sought life imprisonment without parole pursuant to S.C. Code Ann. § 17-25-45. Id. Upon conviction, the trial court sentenced Williams to life imprisonment without the possibility of parole on both charges. Id. Williams's counsel objected, arguing a life sentence would constitute cruel and unusual punishment pursuant to the Eight Amendment because Williams's convictions were drug related and non-violent. Id. On appeal, the Court of Appeals upheld Williams's life sentence, finding he had failed to "meet his burden of establishing evolving standards of decency precluded punishment, or that his sentence is disproportionate to the crime." Id. at 349, 669 S.E.2d at 647. In support of the ruling, the Court of Appeals recognized the longstanding precedent that "stiff penalties for drug crimes do not violate the constitutional prohibition against cruel and unusual punishment." Id. 380 S.C. at 347-48, 669 S.E.2d at 646. The Williams court quoted the United States Supreme Court's consideration regarding the implications of drugs on current society:

> Possession, use, and distribution of illegal drugs represent "one of the greatest problems affecting the health and welfare of our

> population." Petitioner's suggestion that his crime was nonviolent and victimless, echoed by the dissent, is false to the point of absurdity. To the contrary, petitioner's crime threatened to cause grave harm to society.
>
> Quite apart from the pernicious effects on the individual who consumes illegal drugs, such drugs relate to crime in at least three ways: (1) A drug user may commit crime because of drug-induced changes in physiological functions, cognitive ability, and mood; (2) A drug user may commit crime in order to obtain money to buy drugs; and (3) A violent crime may occur as part of the drug business or culture. Studies bear out these possibilities and demonstrate a direct nexus between illegal drugs and crimes of violence.

Id. at 348, 669 S.E.2d at 646-47 (quoting Harmelin v. Michigan, 501 U.S. 957, 1002-03, (1991) (internal citations omitted)). The Williams court went on to note that "a state is justified in punishing a recidivist more severely than it does a first offender." Id. at 348, 669 S.E.2d at 647 (citing Riggs v. California, 525 U.S. 1114 (1999)).

In the present case, the trial court cited Williams in its determination that Petitioner's sentence did not violate the cruel and unusual punishment clause of the Eighth Amendment. (R. p. 146). Defense counsel agreed and acknowledged that Williams was "on point." (R. pp. 146-47). Similarly, the Court of Appeals heavily relied upon Williams in its opinion affirming the trial court. (App'x p. 1-2)

Despite this concession, Petitioner now attempts on appeal to distinguish Williams from his case. Petitioner argues Graham v. Florida, 560 U.S. 49 (2010), which was decided two years after Williams, "indicate[s] that society is maturing and the law is evolving" away from mandatory life without parole sentences. Petitioner also cites to Miller v. Alabama, 567 U.S. ___, 132 S.Ct. 2455 (2012) to support this position. Petitioner contends the recent holdings of the United States Supreme Court, including Graham and Miller, suggest a change in contemporary values and call into question the South Carolina Supreme Court's holding in Williams. Petitioner

claims "these evolving standard of society would indicate that true drug addicts may be punished/treated in a different manner than [life imprisonment without parole]," essentially arguing that drug addicts should be akin to juveniles for recidivist sentencing purposes. This argument is flawed for several reasons.

Initially, the United States Supreme Court's holdings in Graham and Miller had no impact on this Court's holding in Williams. In a sharply divided decision, the Supreme Court in Graham determined the Constitution prohibits the imposition of a life without parole sentence on a juvenile offender who did not commit a homicide. Graham, 560 U.S. at 82. In reaching this holding, the Court concluded juveniles have lessened culpability compared to adult offenders, meaning their crimes are less morally reprehensible than those committed by adults. Id. at 68. Due to minors' potential to reform their character deficiencies, the Court found the sentencing practice to be unconstitutional because "[a] life without parole sentence improperly denies the **juvenile offender** a chance to demonstrate growth and maturity." Id. at 73 (emphasis added). However, the Court instructed: "Those who commit truly horrifying crimes as juveniles may turn out to be irredeemable, and thus deserving of incarceration for the duration of their lives." Id. at 75. The Court's reasoning here demonstrates that even juveniles are sometimes viewed as culpable enough to deserve the imposition of life without parole. In Miller, the Supreme Court held the mandatory imposition of life without parole for juvenile offenders was unconstitutional. 132 S.Ct. 2455. The Miller Court held a sentencer's ability to impose life imprisonment without parole on a juvenile is not foreclosed, but rather, the sentencer must take into account how children are different, and how those differences counsel against irrevocably sentencing juveniles to a lifetime in prison. Id. Neither Graham nor Miller reference the applicability of life without parole for recidivist offenders who are drug addicts and nothing in either opinion supports such a

conclusion. The holdings in Graham and Miller are simply not applicable or relevant to the situation in Petitioner's case.

Moreover, our Court of Appeals recently rejected an argument that a life without parole sentence violated the Eighth Amendment's ban on cruel and unusual punishment for a recidivist offender when the trigger offense was committed when the offender was under the age of eighteen. See State v. Green, 412 S.C. 65, 86, 770 S.E.2d 424, 435 (Ct. App. 2015), reh'g denied (Apr. 21, 2015), cert. denied (Sept. 3, 2015) (finding offender's life without parole sentence did not constitute cruel and unusual punishment because our appellate courts have rejected the argument that it is cruel and unusual punishment to use prior convictions for offenses committed as juveniles for sentencing enhancement under section 17–25–45) (citing State v. Standard, 351 S.C. 199, 204, 569 S.E.2d 325, 328 (2002); Williams, 380 S.C. 336, 345–46, 669 S.E.2d 640, 645 (Ct.App.2008).

Petitioner's argument drug addicts should be treated like juveniles for recidivist sentencing is not supported by any case law or other authority. To the contrary, courts have consistently held harsh penalties, including life without parole, are constitutional for repeat drug offenders. See e.g., Harmelin v. Michigan, 501 U.S. 957 (1991) (holding a mandatory life without parole sentence for possessing more than 650 grams of cocaine did not constitute cruel and unusual punishment); United States v. Hoffman, 710 F.3d 1228 (11th Cir. 2013) (holding a mandatory life without parole sentence for a defendant who was twice convicted for drug felonies based on previous drug offenses and then committed a third drug felony did not violate Eight Amendment protections against cruel and unusual punishment); United States v. Dock, 541 Fed.Appx. 241 (4th Cr. 2013) (sentence of 240 months imprisonment for conspiracy to distribute and possession with the intent to distribute five kilograms or more of cocaine base did not violate

the Eighth Amendment); United States v. Jones, 270 F. App'x 268 (4th Cir. 2008) (sentence of life imprisonment without parole based on prior felony drug convictions was not constitutionally disproportionate and did not violate the Eighth Amendment); United States v. Taylor, 301 F. App'x 248 (4th Cir. 2008) (mandatory life sentence for drug convictions involving more than 50 grams of crack cocaine was not disproportionate to the crime, so as to violate the Eighth Amendment); State v. Brown, 303 S.C. 169, 172, 399 S.E.2d 593, 594 (1991) (holding sentence of 25 years without parole upon conviction of trafficking in cocaine was not cruel and unusual punishment); State v. Kiser, 288 S.C. 441, 443-44, 343 S.E.2d 292, 293 (1986) (holding mandatory minimum sentence of 25 years in prison for trafficking in marijuana was not grossly out of proportion with severity of crime and, therefore, complied with cruel and unusual punishment clause). In support of such positions, courts have repeatedly noted the insidious nature of illegal drugs and the inherent underlying violence that accompanies the illegal drug trade. Petitioner's claims that his crimes were not violent and that he "had never physically hurt anyone" completely ignores the apparent and overtly violent nature of the illegal drug industry.

Petitioner's attempt to paint himself as a docile and drug addled middle-aged man ignores his lengthy prior record of serious drug convictions spanning more than two decades, including trafficking cocaine and distribution of crack cocaine within proximity of a school. Additionally, it is important to note Petitioner faced a harsh sentence of up to thirty years imprisonment for the distribution of crack cocaine–third offense independent of South Carolina's recidivist offender statute. S.C. Code Ann. § 17-25-45 & § 44-53-375(B)(3).

Furthermore, Petitioner's enhanced sentence is entirely consistent with the rationale behind recidivist offender statutes, which is to more severely punish offenders who continue to break the law time and time again. See United States v. Rodriquez, 553 U.S. 377, 385 (2008)

("[A]n offense committed by a repeat offender is often thought to reflect greater culpability and thus to merit a greater punishment. Similarly, a second or subsequent offense is often regarded as more serious because it portends greater future danger and therefore warrants an increased sentence for purposes of deterrence and incapacitation."). Petitioner's sentence was properly enhanced based on the increased culpability inherent in his status as an offender who had previously been convicted of two prior serious offenses. For all of these reasons, the Court of Appeals correctly affirmed the trial court's imposition of a life without parole sentence upon Petitioner's conviction of a third serious offense. This Court should deny certiorari.

CONCLUSION

For all the foregoing reasons, this petition for a writ of certiorari should be denied.

Respectfully submitted,

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August 15, 2016

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PROOF OF SERVICE

I, Megan Harrigan Jameson, certify that I have served the within Return to Petition for Writ of Certiorari on Petitioner by depositing two copies of the same in the United States mail, postage prepaid, addressed to:

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I further certify that all parties required by Rule to be served have been served.
This 15th day of August, 2016.

Megan Harrigan Jameson

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