STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Orangeburg County

Honorable Benjamin H. Culbertson, Circuit Court Judge

RECEIVED

JUL 24 2017

S.C. SUPREME COURT

ROMEO BROWN,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2016-002401

PETITION FOR WRIT OF CERTIORARI

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ISSUE PRESENTED

Did trial counsel provide ineffective assistance of counsel by failing to object when the trial judge ordered Petitioner to wear shackles during his jury trial without making a determination that their use was justified by a specific state interest in violation of Petitioner's state and federal constitutional rights to a presumption of innocence, to the assistance of counsel, to dignified and decorous judicial proceedings, and to not place his character in evidence?

STATEMENT OF THE CASE

On October 27, 2010, Alexander Harrison was fatally shot in Randy Ryant's front yard shortly before 9:00 pm. The state alleged at trial that Petitioner was the shooter. Randy Ryant is married to Petitioner's sister, Tammy Ryant. App. 116, ll. 1-9. The Ryant front yard was a gathering place where individuals socialized, drank, and played cards and dominos. App. 117, l. 20 – 118, l. 9. Several people were in the yard at the time of the shooting. Lieutenant Craig Davis with the Orangeburg County Sheriff's Office was the first officer on the scene. App. 80, l.3 – 82, l. 19. Witnesses Vandy Morgan, Joe Thomas, Isaak Morgan and Brandy Mack told Lieutenant Davis that the shooter was an unknown black male who was six feet to six feet two inches tall and weighed between two hundred and two hundred and twenty pounds. App. 102, l 10 – 103, l. 25. At trial, Joe Thomas and Brandy Mack testified that Petitioner was the shooter. App. 152, ll. 1-20; App. 291 ll. 13-25. Thomas testified that after the shooting the shooter ran away. App. 166, ll. 21-25. Two additional witnesses who were not interviewed by Lieutenant Davis on the night of the shooting, Ulysses Daniels and Shawn Guinyard, also testified at trial that Petitioner was the shooter. App. 252, ll. 1-13; App. 318, l. 21 – 319, l. 5.

Petitioner presented an alibi defense. He testified that on October 27, 2010, the day of the shooting, he spent the afternoon in "Mr. Napp's yard" next to the Four Way Convenience Store. App. 704, ll. 1-7. As it got dark, Petitioner's nephew, Tedriks Green, picked him up. Green drove Petitioner to Biddie Banquet where the men purchased food and then to Green's house to watch the World Series. App. 704, l. 7 – 706, l. 19. Petitioner testified that he fell asleep watching the baseball game. Green woke him up and took him home before the game was over. App. 707, l. 11 – 708, l. 9. Green's testimony at trial was consistent with and corroborated Petitioner testimony. App. 619, l. 6 – 621 l. 23). Green said he took his uncle home around 11:00 pm. App. 622, ll. 7-15.

Petitioner testified that after his nephew dropped him off he went next door to check on his neighbor, Erika Smith. App. 708, l. 7 – 709, l. 11. He arrived at his neighbor's house around 11:00 pm. App. 745, l. 18 – 746, l. 8. Petitioner testified that Smith and her friend were playing cards and they tried to teach Petitioner how to play. App. 709, ll. 12-22). Petitioner eventually went home and went to bed. App. 710, l. 23 – 711, l. 25. Erika Smith's testimony at trial was consistent with Petitioner's testimony. App. 643, l. 23 – 646, l. 25. Smith said Petitioner stayed at her house for about thirty minutes before he went home. App. 645, ll. 16-23.

Petitioner testified that on September 15, 2010 through September 18, 2010, about six weeks before the shooting, he was hospitalized for a significant injury to his leg requiring seventeen staples to close the wound. Petitioner was released from wound care on October 19, 2010, but still required the use of a cane to walk. App. 684, l. 23 – 700, l. 18. Petitioner's sister, Tammy Ryant, his neighbor, Erika Smith, and his nephew, Tedricks Green, all testified that in October 2010, Petitioner required the use of a cane. App. 599, l. 6 – 600, l. 23; App. 618, l. 22 – 619, l. 8; App. 645, l. 24 – 646, l. 6.

The state presented no forensic evidence linking Petitioner to the shooting of Harrison. The state's case against Petitioner was based solely on eyewitness identifications.

An Orangeburg County Grand Jury indicted Petitioner on March 16, 2011 for the offense of murder, and on April 11, 2012 for possession of a firearm by a person convicted of a violent crime. App. 1171-1174. His case was called to trial on May 22, 2012 before the Honorable Diane Schaffer Goodstein, and a jury. App. 1. Assistant Solicitor Donald Sorenson represented the state, and Bryon Gipson represented Petitioner. App. 1. At the conclusion of the trial, the jury found Petitioner guilty. App. 921, ll. 15-25. Judge Goodstein sentenced Petitioner to life without parole

for murder pursuant to S.C. Code Ann. § 17-25-45, and five years concurrent for the weapons offense. App. 941, ll. 2-20.

After his convictions and sentence were affirmed on direct appeal, Petitioner filed an application for post-conviction relief raising the claim argued in this petition. App. 993-1095. The state filed a return dated September 30, 2015. App. 1096-1102. An evidentiary hearing was convened on May 17, 2016 before the Honorable Benjamin H. Culbertson. App. 1103. Assistant Attorney General J. Clayton Mitchell represented the state, and Jonathan D. Waller represented Petitioner. App. 1103.

During the evidentiary hearing, Petitioner testified that the trial judge required him to wear shackles. He said the shackles were metal braces that were placed on his legs "under [his] pants" and were not visible to the jury. App. 1119, l. 7 – 1120, l. 23. Despite not being visible to the jury, the shackles made an audible noise whenever Petitioner walked or moved. Petitioner testified that if he attempted to stretch his legs out too far, the shackles locked and made an audible "click, click, click sound." App. 1119, ll. 12-17. He also maintained that when he walked as well as when he was stepping up to and later off of the witness stand during his testimony, the shackles made a "click, clicking" sound. They also made him walk "funny." App. 1119, l. 14 – 1120, l. 23. Petitioner noticed on multiple occasions several jurors looking at him puzzled during the trial because of the noise caused by the shackles and the way he was walking. He testified, "I seen one or two of them [the jurors] . . . leaning over . . . looking to see, 'What is that? What's is going on with you? What is that?' I mean, and I'm like I hope - - I'm saying to myself, 'I hope they [don't] think I'm planning no escape or nothing,' because it was, you know, strange." App. 1120, ll. 5-19.

Bryon Gipson, Petitioner's trial counsel, admitted the judge ordered Petitioner to wear shackles during the trial. He testified, "Judge Goodstein felt more comfortable in this case having

some type of shackles being on him . . . I'm not a big fan of them, but that was the [j]udge's decision and she said that's what's going to happen so that's what happened. The shackles were underneath the pants." App. 1140, ll. 12-21. Gipson said the shackles were not visible to the jury and further maintained that he did not recall hearing "the clicking" noise when Petitioner moved or walked. App. 1140, ll. 21-24; App. 1141, ll. 19-23; App. 1147, ll. 24-25.

The PCR court denied Petitioner relief. The court found Petitioner failed to prove counsel "was ineffective in failing to object to [Petitioner's] shackles allegedly being visible to the jury." App. 1167. The court maintained Petitioner's testimony that the jurors could hear "a clicking sound when he was walking into the courtroom and that the jurors may have noticed his unnatural gait" not credible. App. 1167-1168. However, even assuming Petitioner "was seen by the jurors with his movement restricted by the shackles," the court found "this worked to his advantage to support the argument that [Petitioner] could not have physically fought the victim nor committed the crime." App. 1168. The court concluded that Petitioner failed to prove any prejudice. App. 1168.

Because trial counsel provided ineffective assistance of counsel by failing to object when the trial judge ordered Petitioner to wear shackles during his entire jury trial without making a determination that their use was justified by a specific state interest in violation of Petitioner's state and federal constitutional rights to a presumption of innocence, to the assistance of counsel, to dignified and decorous judicial proceedings, and to not place his character in evidence, this petition for writ of certiorari follows.

ARGUMENT

Trial counsel provided ineffective assistance of counsel by failing to object when the trial judge ordered Petitioner to wear shackles during his jury trial without making a determination that their use was justified by a specific state interest in violation of Petitioner's state and federal constitutional rights to a presumption of innocence, to the assistance of counsel, to dignified and decorous judicial proceedings, and to not place his character in evidence.

Trial counsel provided ineffective assistance of counsel by failing to object when the trial judge ordered Petitioner to wear shackles during his jury trial without making a determination that their use was justified by a specific state interest in violation of Petitioner's state and federal constitutional rights to a presumption of innocence, to the assistance of counsel, to dignified and decorous judicial proceedings, and to not place his character in evidence.

The Sixth Amendment to the United States Constitution guarantees a defendant the right to effective assistance of counsel. U.S. Const. amend. VI; Strickland v. Washington, 466 U.S. 668 (1984). The United States Supreme Court has established a two pronged test to evaluate allegations of ineffective assistance of counsel. Petitioner must prove "that counsel's performance was deficient" and fell below reasonable professional norms, and the deficient performance prejudiced Petitioner. Strickland, 466 U.S. at 687. Under the second prong, Petitioner must show "there is a reasonable probability that, but for counsel's unprofessional errors, the result would have been different. Cherry v. State, 300 S.C. 115, 117-118, 386 S.E.2d 624, 625 (1989) (citing Strickland, 466 U.S. at 688). "A reasonable probability is a probability sufficient to undermine confidence in the outcome of the trial." Johnson v. State, 325 S.C. 182, 186, 480 S.E.2d 733, 735 (1997) (citing Strickland, 466 U.S. at 668).

In Illinois v. Allen, 397 U.S. 337 (1970), the United States Supreme Court examined the right of a criminal defendant to be present throughout his trial. The Court recognized the need to balance the defendant's right to be present with the need to maintain dignity, order and decorum in the courtrooms. Id. at 343-344. Although the Court recognized that in some situations, binding and gagging a defendant may be the fairest and most reasonable way to handle some disruptive defendants, the Court explained "even to contemplate such a technique, much less see it, arouses a feeling that no person should be tried while shackled and gagged except as a last resort." Id. at 344. The Court explained that the sight of the shackles and gags would likely have a significant effect on the jury's feelings about the defendant and the use of the restraints represented "an affront to the very dignity and decorum of judicial proceedings." Id. Further, a defendant's ability to communicate with counsel is greatly reduced when a defendant is restrained. Id. Almost two decades later, in Holbrook v. Flynn, 475 U.S. 560, 568-569 (1986), the Supreme Court explained that a defendant appearing in physical restraints before the jury is "inherently prejudicial."

In Deck v. Missouri, 544 U.S. 622, 626 (2005), the Court explained "the law has long forbidden the routine use of visible shackles during the guilt phase" of a criminal trial. The rule is deeply rooted in the common law. Id. (citing 4 W. Blackstone, Commentaries on the Laws of England 317 (1769)). Traditionally, courts have followed this rule. Id. at 626-627 (citing State v. Roberts, 206 A.2d 200, 203 (N.J. Super. Ct. App. Div. 1965); French v. State, 377 P.2d 501, 502-504 (Okla. Crim. App. 1962); Eaddy v. People, 174 P.2d 717, 718 (Colo. 1946)(en banc); State v. McKay, 165 P.2d 389, 405-406 (Nev. 1946); Blaine v. United States, 136 F.2d 284, 285 (D.C. Cir. 1943)(per curiam); Blair v. Commonwealth, 188 S.E. 390, 393 (Ky. Ct. App. 1916); Hauser v. People, 71 N.E. 416, 421 (Ill. 1904); Parker v. Territory, 52 P. 361, 363 (Ariz. 1898); State v. Williams, 50 P. 580, 581 (Wash. 1897); Rainey v. State, 20 Tex. Ct. App. 455, 472-473 (Tex. Ct.

App. 1886) (opinion of White, P.J.); State v. Smith, 8 P. 343 (Ore. 1883); Poe v. State, 78 Tenn. 673, 674-678 (Tenn. 1882); State v. Kring, 64 Mo. 591, 592 (Mo. 1877); People v. Harrington, 42 Cal. 165, 167 (Cal.1871)).

The Court explained that "a basic element of the 'due process of law' protected by . . . the Fifth and Fourteenth Amendments to the Constitution prohibit[s] the use of physical restraints visible to the jury absent a trial court determination . . . that [the restraints] are justified by a state interest specific to a particular trial." Deck, 544 U.S. at 629. The purpose of this prohibition is to give effect to three fundamental legal principles. First, the criminal justice system presumes a defendant is innocent until proven guilty. Id. "Visible shackling undermines the presumption of innocence and the related fairness of the factfinding process." Id. Second, physical restraints may interfere with a defendant's ability to communicate with his counsel and participate in his own defense. Id. at 631. Third, the use of shackles undermines the dignity and decorum of judicial proceedings, "which includes the respectful treatment of defendants, reflects the importance of the matter at issue, guilt or innocence, and the gravity with which Americans consider any deprivation of an individual's liberty through criminal punishment." Id.

The Court explained that the same "considerations that militate against the routine use of visible shackles during the guilt phase of a criminal trial apply with like force to penalty proceedings in capital cases." Id. at 632. Additionally, the Court recognized that when an offender appears before a jury in shackles, the impression for the jury is that "court authorities consider the offender a danger to the community." Id. at 633. The presence of the shackles negatively affects the jury's perception of the character of the defendant. Id. at 633. As courts throughout the country have held, the presence of physical restraints marks the person as violent, dangerous, and untrustworthy. See Ruimveld v. Birkett, 404 F.3d 1006, 1015-1016 (6th Cir. 2005); Duckett v.

Godinez, 67 F.3d 734, 748 (9th Cir. 1995); Spain v. Rushen, 883 F.2d 712, 720-721 (9th Cir. 1989); Harrell v. Israel, 672 F.2d 632, 635 (7th Cir. 1982); Woodards v. Cardwell, 430 F.2d 978, 982 (6th Cir. 1970); People v. Miller, 96 Cal. Rptr. 3d 716, 721 (Cal. Ct. App. 2009); Shultz v. State, 179 So. 764, 765 (Fla. 1938); Miller v. State, 852 So.2d 904 (Fla. Ct. App. 2003); McKenzey v. State, 225 S.E.2d 512, 514 (Ga. Ct. App. 1976); Stephenson v. State, 864 N.E.2d 1022, 1033 (Ind. 2007); State v. Anderson, 192 P.3d 673, 677 (Kan. Ct. App. 2008); Dickerson v. State, 269 S.W.3d 889 (Mo. 2008); Sanchez v. State, 223 P.3d 980, 992 (Okla. Crim. App. 2009); State v. Kessler, 645 P.2d 1070, 1072-1073 (Or. Ct. App. 1992); Davis v. Armenakis, 948 P.2d 327 (Or. Ct. App. 1997); Hardin v. Estelle, 365 F.Supp. 39, 45-46 (W.D. Tex. 1973); State v. Levy, 132 P.3d 1076, 1086 (Wash. 2006); State ex rel. McMannis v. Mohn, 254 S.E.2d 805, 810 (W.Va. 1979).

As an initial matter, the PCR court mischaracterized Petitioner's argument and testimony. The court characterized Petitioner's claim as alleging counsel "was ineffective in failing to object to [Petitioner's] shackles allegedly *being visible* to the jury." App. 1167 (emphasis added). The court further found Petitioner's testimony both not credible and "unsupported by any evidence before the court." App. 1168. This was error and unquestionably not true. Petitioner ***never alleged at any time*** *that the shackles were visible to the jury.* Instead, Petitioner maintained it would have been obvious to the jury that Petitioner was wearing shackles or some type of restraint system because of the "clanking" or "clicking" noise the shackles made when he walked or moved in the courtroom and his unnatural gait caused by the shackles when he walked.

In his PCR application, Petitioner specifically stated that the shackles were "not displayed" to the jury, but that the jurors undoubtedly could hear "the clanking noise" the shackles made when Petitioner moved or walked. App. 1007-1010. During his testimony at the evidentiary hearing, Petitioner stated that the shackles were metal braces that were placed on his legs "under [his] pants"

and were not visible to the jury. App. 1119, l. 7 – 1120, l. 23. He said if he attempted to stretch his legs out too far, the shackles locked and made an audible "click, click, click sound." App. 1119, ll. 12-17. He also maintained that when he walked as well as when he was stepping up to and later off of the witness stand during his testimony, the shackles made a "click, clicking" sound. They also made him walk "funny." App. 1119, l. 14 – 1120, l. 23. Petitioner noticed on multiple occasions several jurors looking at him puzzled during the trial because of the noise caused by the shackles and the way he was walking. He testified, "I seen one or two of them [the jurors] . . . leaning over . . . looking to see, 'What is that? What's is going on with you? What is that?' I mean, and I'm like I hope - - I'm saying to myself, 'I hope they [don't] think I'm planning no escape or nothing,' because it was, you know, strange." App. 1120, ll. 5-19.

Petitioner's testimony at the evidentiary hearing was supported and corroborated by the record at trial. Before *voir dire* and jury selection, Judge Goodstein stated:

> For the record, the reason that I have postponed the jury selection is because of the constraint issue regarding the defendant. The detention facility in Orangeburg has a different system . . . and what I should have done yesterday and failed to do yesterday was to ascertain and find out whether or not the detention facility folks here, the security people here in Orangeburg had the, the under the pant restraint system, which they do not, and I did not realize that until, thank goodness, Mr. Gipson [trial counsel] brought that to my attention just a few moments ago. What I have done is, I have asked the Dorchester County detention folks to have the under the pant restraint system sent from Dorchester County which will allow us to use that restraint system on the defendant in this case. It is unacceptable to me, obviously, I'm not going to have him in any kind of restraints which the jury could see **or hear**, and I don't think it's prudent particularly in a courtroom of this size, but there's got to be some restraint system in place. Therefore, I have sent the jury to lunch early, the jury panel, so that we can obtain and use the under the pant restraint system on the defendant.

App. 9, l. 3 – 10, l. 1 (emphasis added).

Trial counsel did not object when the judge ordered Petitioner to wear shackles in the courtroom or even request precautions be taken to prevent the jurors from hearing or noticing the shackles when Petitioner entered or exited the courtroom or moved in front of the jury.

At the conclusion of the second day of trial, after several witnesses had testified, the trial judge again brought up the issue of the restraints. She stated, "We're going to, we'll keep the restraints and they've confirmed, *see if you can please get Mr. Brown [Petitioner] up here and seated before the jury comes in*." App. 176, ll. 22-24. In response to the judge's comment, the assistant solicitor then asked to put on the record "what [he] had pointed out" earlier. The solicitor stated:

> I'm just afraid that some of **the jurors had the opportunity to observe Mr. Brown [Petitioner] walk in, and *it was pretty obvious that there was something going on with his legs. I mean, <u>it's clanking</u> and <u>he's walking like the tin man</u>.*** And my concern is that, you know, part of his defense I think is going to be that he had something wrong with his leg and couldn't have done this, and now we've got a bunch of jurors that have seen him, which obviously is not the condition that he is in. I mean, that bothers me a little bit now, I mean, you know, if he ultimately does start putting in stuff about his leg and couldn't have done this, that or the other, that **these jurors are going to have seen him walking and said, yeah, he does have something wrong with his legs, *he's got braces on* them or something.**

App. 177, ll. 3-20 (emphasis added).

Again, trial counsel did not object to the court's requirement that Petitioner wear shackles before the jury despite the fact that even the solicitor recognized the shackles were "clanking" when Petitioner walked or moved, and caused him to walk with an unnatural gait.

Based on this evidence from trial, which fully supports Petitioner's testimony during the evidentiary hearing and the allegations he raised in his application, the PCR court erred by finding Petitioner's "testimony not credible on this issue." App. 1168. The assistant solicitor's comments during trial corroborate Petitioner's statements that the shackles made a "clanking" or "clicking" noise when he walked or moved, and caused him to walk "funny." Consequently, there was ample

evidence in the record that supported Petitioner's testimony and the court erred by finding otherwise.

Based on the assistant solicitor's comments during trial and Petitioner's testimony during the evidentiary hearing, the jurors unquestionably heard the "clanking" and "clicking" noise made by the shackles when Petitioner walked or moved, and his unnatural gait. See 177, ll. 4-8 (the solicitor asserted "that some of the jurors had the opportunity to observe Mr. Brown walk in, and *it was pretty obvious* that there was something going on with his legs. I mean, *it's clanking and he's walking like the tin man.*") (emphasis added). Even though the shackles were not visible to the jury, the only conclusion the jurors could have reached was that Petitioner was wearing shackles or "braces" as the solicitor called them. See App. 177, l. 18.

Trial counsel's acquiescence in Petitioner appearing before the jury in shackles was deficient performance. Counsel should have objected when the judge required Petitioner to wear shackles throughout his trial, particularly when the judge never concluded there was any special need for the restraints or that use of the restraints was justified by a specific state interest. See Deck, 544 U.S. at 626-627 (holding the Constitution permits a state "to shackle a criminal defendant only in the presence of a special need" and that trial "courts may not shackle defendants routinely, but only if there is a particular reason to do so."). Based on her comments at the beginning of trial, it appears the trial judge routinely orders criminal defendants, like Petitioner, to wear shackles during trial without finding any special need to do so. The judge postponed *voir dire* and jury selection to allow officials in Orangeburg County where Petitioner was being tried to obtain shackles from Dorchester County, which is in the same circuit. Without providing any reason whatsoever, the judge stated "there's got to be some restraint system in place." App. 9, l. 3 – 10, l. 1.

During the evidentiary hearing, trial counsel testified that "Judge Goodstein felt more comfortable" with Petitioner wearing shackles, but he did not state why. App. 1140, ll. 15-17. Counsel should have objected. His failure to do so constitutes ineffective assistance of counsel. Significantly, trial counsel offered no strategic reason as to why he did not object. He admitted he was "not a big fan of them [the shackles]" but claimed it "was the judge's decision and she said that's what's going to happen so that's what happened." App. 1140, ll. 12-21. Counsel simply acquiesced in Petitioner appearing before the jury in shackles.

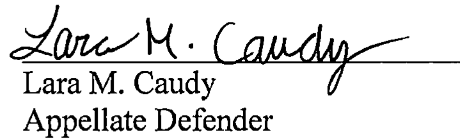
As explained in Holbrook, supra, shackling is inherently prejudicial. It undermines the presumption of innocence and the dignity and decorum of judicial proceedings. Deck, 544 U.S. 629. Trial counsel's deficient performance prejudiced Petitioner because the shackles conveyed to the jury that Petitioner was a dangerous and violent person. and negatively affected his character. Petitioner presented an alibi defense and testified at trial. His credibility was therefore crucial to his defense. If trial counsel would have objected when the judge required Petitioner to wear shackles, the outcome of his trial would have been different.

Respectfully, this Court should reverse the order of the PCR court and remand for a new trial.

CONCLUSION

Petitioner respectfully requests this Court grant the petition for writ of certiorari and permit full briefing on the issue presented. In the event this Court dispenses with further briefing, Petitioner respectfully requests this Court reverse the PCR court and remand a new trial.

Respectfully submitted,



Lara M. Caudy
Appellate Defender

ATTORNEY FOR PETITIONER

This 24th day of July, 2017.

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Orangeburg County

Honorable Benjamin H. Culbertson, Circuit Court Judge

ROMEO BROWN,

PETITIONER

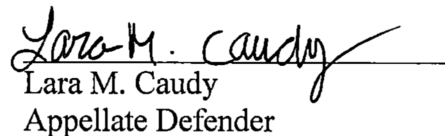
V.

STATE OF SOUTH CAROLINA,

RESPONDENT

CERTIFICATE OF SERVICE

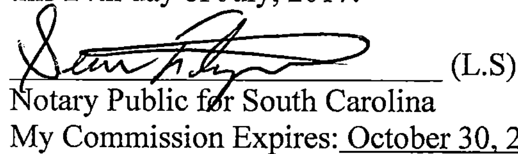
The undersigned hereby certifies that a true copy of the Petition for Writ of Certiorari and a copy of the Appendix in the above referenced case have been served upon Ruston Neely, Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201; and a copy of the Petition for Writ of Certiorari and a copy of the Appendix have been served upon Romeo Brown, #185544, at McCormick Correctional Institution, 386 Redemption Way, McCormick, SC 29899, this 24th day of July, 2017.



Lara M. Caudy
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 24th day of July, 2017.



____________________________ (L.S)
Notary Public for South Carolina
My Commission Expires: October 30, 2022.