STATE OF SOUTH CAROLINA
In The Supreme Court

On Writ of Certiorari to the Court of Appeals
Appeal from Richland County
Honorable DeAndrea G. Benjamin, Circuit Court Judge

Appellate Case No. 2018-000737

Opinion No. 2018-UP-031 (S.C. Court App. Filed January 17, 2018)

THE STATE,

Respondent,

vs.

ARTHUR WILLIAM MACON,

Petitioner.

RETURN TO PETITION FOR WRIT OF CERTIORARI

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ATTORNEYS FOR RESPONDENT

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STATEMENT OF THE CASE

In January 2013, the Richland County Grand Jury indicted Petitioner for one count of armed robbery and four counts of kidnapping. On September 29-October 3, 2014, a jury trial was held in the Richland County Court of General Sessions with the Honorable DeAndrea G. Benjamin presiding. Petitioner was represented by Kristy G. Goldberg, Esq. The Respondent (the State) was represented by Assistant Solicitors Richard Cathcart and Jeremiah Shellenberg of the Fifth Circuit Solicitor's Office. At the conclusion of trial, the jury acquitted Petitioner of each kidnapping count, but convicted him of armed robbery. Following the verdict, the trial judge sentenced Petitioner to twenty three years' imprisonment.

On appeal, the Court of Appeals issued an unpublished opinion affirming Petitioner's conviction. State v. Macon, Op. No. 2018-UP-031 (Filed January 17, 2018). Thereafter, Petitioner filed a petition for rehearing with the Court of Appeals on February 16, 2018. The petition for rehearing was denied on March 22, 2018. Petitioner filed a Petition for a Writ of Certiorari with this Court. This Return on behalf of the State now follows.

STATEMENT OF FACTS

On August 30, 2012, Jason Colon entered the TD Bank branch on Farrow Road in Richland County and robbed it with a plastic pistol that was altered to appear authentic. (R. 133). Colon absconded with $6,000 and retreated to the Hilton Garden Inn across the street from the bank. After noticing police cars surrounding the TD Bank parking lot, Diana Williams saw a man running from that parking lot through the woods towards the parking lot of a Hilton Garden Inn. (R. 42). This man was later identified as Jason Colon. Thinking Colon looked suspicious, Williams called 911 as she followed him in her car. (R. 43). Once Colon reached the Hilton, Williams observed him speaking with another man who wore a collared yellow shirt. (R. 44). The man in yellow gestured toward the back of the parking lot "as if he was telling [Colon] to go back that way." (R. 44). The man in yellow then drove away in a black truck. (R. 46). As he backed out, he nearly struck Williams' vehicle and she was able to observe his face. (R. 45–46).

Williams remained on the phone with 911 during this time, giving details of what occurred and a description of the truck and its driver. (R. 51). Because the tailgate of the truck was down, Williams was only able to give a partial plate number. (R. 46). Based on Williams's description, Officer Frieda Wyatt eventually pulled over the black pickup truck. (R. 75). Wyatt identified Petitioner as the driver. (R. 76). Williams, still in her car, drove past where the black pickup was pulled over. (R. 88–90). After observing him, Williams identified Petitioner as the man she had seen speaking with Colon in the parking lot of the Hilton Garden Inn. (R. 55). Petitioner was placed under arrest for driving under suspension and was later charged with one count of armed robbery and four counts of kidnapping.

Investigator Jason Williams interviewed Colon upon his arrest. Williams expressed how distressed Colon appeared and explained the interview "took kind of a while because it seemed

like he wasn't all the way there." (R. 106). Williams explained Colon was "a little mentally challenged," but he was eventually able to get Colon's statement, in which he confessed to committing the robbery. (R. 106). Williams searched Petitioner's truck after it was impounded and discovered a police scanner tuned to the same channel used by Richland County Sheriff's deputies. (R. 104). Specifically, it was set to broadcast transmissions in the region where the TD Bank was located. (R. 105).

Investigator Kerry Johnson interviewed Petitioner after his apprehension. Initially, Petitioner explicitly informed Johnson he did not have anyone with him while he was driving around that day. (R. 152). However, after Johnson told Petitioner that Colon had identified him as his cousin who dropped him off outside the bank, Petitioner modified his statement. Petitioner claimed Colon was with him earlier in the day because Colon wanted a ride to "his homeboy's house" but Petitioner instead just dropped him off at a bus stop—which happened to be near the TD Bank. (R. 154).

At trial, the State sought to offer the testimony of Colon's father, Ricky Woodberry. Petitioner objected and the State proffered Woodberry's testimony outside the presence of the jury. (R. 113). Petitioner initially objected to Woodberry's testimony regarding how his son suffered a head injury during a shooting because Woodberry was not present when Colon was shot and therefore any statement he offered was hearsay. (R. 119). Petitioner additionally objected to the remainder of Woodberry's testimony—that Colon is "easily led" and "passive"—as improper character evidence designed to bolster Colon's testimony "making it seem more or less likely that [Colon] may be passive, may be cooperative with the police, may be telling the truth." (R. 120). Petitioner further argued the evidence was irrelevant. (R. 120).

After the proffer, the trial court ruled it would preclude Woodberry from mentioning that

his son is "easily led" or usually says yes, but would allow him to testify as to how Colon was injured and that Colon is passive. (R. 126). Woodberry then testified before the jury that his son was shot in the head by a stray bullet while they were living in Brooklyn, New York. (R. 128). Petitioner objected, saying "Your Honor, I would renew my previous objection." (R. 128, lines 15-16). The trial court sustained the objection; however, Petitioner did not move to strike and lodged no further objections[1]. (R. 128). Woodberry continued to discuss how the bullet entered Colon's temple and went through his frontal lobe. (R. 128). According to Woodberry, Colon was subsequently diagnosed with schizophrenia. (R. 129). Woodberry further attested that his son began talking to himself and became passive. (R. 129). Colon improved some with medication, but Woodberry testified he retained the mind of a thirteen-year-old. (R. 129).

Colon then testified.[2] Colon explained he went to the TD Bank the day of the robbery to cash his unemployment check. (R. 132, 140). However, Colon then testified Petitioner gave him a toy gun and told him to go into the bank and demand money. (R. 133). Colon explained Petitioner colored in part of the gun to make it look real. (R. 133). Colon testified that after the robbery he was supposed to meet Petitioner in front of the hotel and get into the bed of the truck. (R. 134). On cross examination, Colon indicated he and Petitioner discussed the robbery months prior, and that was when Petitioner gave him the gun. (R. 141). However, on redirect, Colon

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[1] The record is unclear as to what Petitioner is objecting to at this point as well as what objection the trial judge is sustaining. It is possible that Petitioner is merely renewing his previous objections made *in limine* in the presence of the jury, or perhaps Petitioner was objecting on different grounds. Petitioner's statement "Your Honor, I would renew my previous objection" seems to indicate that Petitioner is placing his previous objection on the record. Accordingly, it is possible that by sustaining Petitioner's objection the trial judge was reaffirming her previous ruling that Woodberry would be precluded from testifying that Colon is easily lead or usually says yes, or the trial judge could have been sustaining an entirely new objection. In either event, Petitioner did not move to strike Woodberry's testimony, nor did Petitioner object any further and Woodberry continued to testify unabated.

[2] Although it appears Colon had reached a plea deal with the State, no evidence of that was offered before the jury. (R. 7).

suggested he received the gun on the day of the robbery. (R. 142). The jury ultimately found Petitioner guilty of armed robbery. He was sentenced to twenty-three years' imprisonment.

ARGUMENT

In Petitioner's petition for a Writ of Certiorari, Petitioner alleges the Court of Appeals erred for three reasons. First, Petitioner alleges the Court of Appeals erred in finding that Woodberry's testimony was not improper character evidence and did not constitute bolstering. Secondly, Petitioner alleges the Court of Appeals erred in finding that Woodberry's testimony was so insignificant overall that it did not prejudice Petitioner and any error in its admission was harmless. Finally, Petitioner contends that his argument regarding Woodberry's testimony being outside the scope of a lay witness was properly preserved for appeal. Petitioner's arguments are meritless. Furthermore, the facts of this case do not feature any of the considerations governing review by this Court under rule 242 SCAR. Most significantly, there was no dissent in the decision of the Court of Appeals, and the decision of the Court of Appeals is not in conflict with a prior decision of this Court. Petitioner's request for a Writ of Certiorari should be denied.

I.

The Court of Appeals correctly determined Ricky Woodberry's testimony was not improper character evidence and was not bolstering.

Petitioner contends the Court of Appeals erred by finding that Woodberry's testimony was not improper character evidence and did not constitute bolstering. In support of that contention, Petitioner maintains the Court of Appeals improperly applied the law to the facts in this case. Specifically, Petitioner alleges the purpose of Woodberry's testimony was to bolster the testimony of Colon by suggesting that he was incapable of planning a robbery because of his medical condition. Petitioner's argument is without merit. The Court of Appeals properly affirmed the trial court's judgement, because Woodberry's testimony did not vouch for Colon's credibility or indicate that he was telling the truth.

In criminal cases, appellate courts sit to review errors of law only. State v. Baccus, 367 S.C. 41, 48, 625 S.E.2d 216, 220 (2006). "The admission or exclusion of evidence is left to the sound discretion of the trial judge, whose decision will not be reversed on appeal absent an abuse of discretion." State v. Black, 400 S.C. 10, 16, 732 S.E.2d 880, 884 (2012). An abuse of discretion occurs when the conclusions of the trial court either lack evidentiary support or are controlled by an error of law. State v. Holder, 382 S.C. 278, 293, 676 S.E.2d 690, 698 (2009). An appellate court will not reverse based on the erroneous admission or exclusion of evidence unless prejudice has been shown. State v. Taylor, 333 S.C. 159, 172, 508 S.E.2d 870, 876 (1998). "The prohibition against bolstering is for the purpose of preventing a witness from testifying whether another witness is telling the truth and to maintain 'the assessment of witness credibility within the exclusive province of the jury.'" State v. Taylor, 404 S.C. 506, 514-515, 745 S.E.2d 124, 128 (Ct. App. 2013) (quoting State v. McKerley, 397 S.C. 461, 464, 725 S.E.2d 139, 141 (Ct. App. 2012)). "What commonly is called 'character evidence' is only such when 'character' is employed as a synonym for 'reputation'." Michelson v. U.S., 335 U.S. 469, 477, 69 S.Ct. 213, 219 (1948).

To determine whether the Court of Appeals erred in holding that Woodberry's testimony was properly admitted, it is instructive to review the relevant portion of the testimony. The following testimony was presented before the jury during the State's direct examination of Woodberry:

Q: Okay. And how long had y'all been in Brooklyn?

A: All our life until we came here.

Q: Okay. And what if anything occurred that made y'all come here?

A. My son was shot in the head.

Q. Okay. How did that occur?

A. He was standing in front of the building where we resided at, and two gentlemen came running through the building, you know, one was chasing the other, and they were shooting at each other. And my son happened to be standing there, and he caught a stray bullet.

MS. GOLDBERG: Your Honor, I would renew my previous objection.

THE COURT: All right. Objection sustained.

BY MR. CATHCART: And where did the bullet exactly hit him?

A: In his temple in his head, frontal lobe.

Q: Okay. And when -- did the bullet stay in there?

A: No, it went in and came out the other side.

Q: Through the temple lobe?

A: Yes.

Q: Frontal lobe?

A: Yes.

Q: So he basically got a lobotomy from a bullet?

A: Yes.

Q: Did the doctors indicate -- well, did that change him in any way?

A: Yes, it did.

Q: Okay. Did it make him in what way? How -- did he become what?

A: He was diagnosed with schizophrenia. He started talking to hisself [sic]. He became passive.

Q: Did the doctors indicate his mind would be that of what?

A: A 13-year-old.

Q: Okay. And he is how old now?

A: He is 28.

Q: And has he improved in the past couple of years?

A: No. No. While he is on medication he has gotten a little better.

Q: Okay. But he still has the mind of 13-year-old?

A: Yes, he does[3].

(R. 128-129).

Petitioner argues Woodberry's testimony served only as character evidence that Colon is "easily led by others" and therefore "has a propensity to act as instructed by others." (Petition for Writ of Certiorari p. 5, 7). This argument is misleading as it is premised on testimony that was expressly excluded by the trial judge following the proffer. Woodberry indicated outside the presence of the jury that his son is easily led and most of the time he will say yes when asked to do something. (R. 116). However, prior to Woodberry presenting his testimony to the jury, the trial judge ruled it would "not allow in the testimony about [Colon] being easily led" or "usually saying yes." (R. 126). Woodberry complied with this restriction and never testified before the jury that Colon was easily led or usually says yes. Thus, the portion of Woodberry's testimony about which Petitioner complains was not presented to the jury. The jury merely heard

[3] Arguably, Petitioner has not preserved any challenges to this testimony. During direct examination, Petitioner renewed his previous objection, which the trial court sustained. He did not move to strike any of the testimony, offered immediately before the objection, nor did he request a curative instruction. Therefore, he failed to preserve any issue for the court's review because he received no adverse ruling to appeal. See State v. Patterson, 324 S.C. 5, 18, 482 S.E.2d 760, 766 (1997) ("The trial judge ruled in appellant's favor and appellant failed to move to strike or request a curative instruction. Therefore, this issue is not preserved for review."); State v. Wilson, 389 S.C. 579, 583, 698 S.E.2d 862, 864 (Ct. App. 2010) ("When an objecting party is sustained, the trial court has rendered a favorable ruling, and therefore, it becomes necessary that the sustained party move to cure, or move for a mistrial if such a cure is insufficient, in order to create an appealable issue."). Furthermore, if we assume the trial judge sustained the objection to testimony it had previously ruled to allow in the proffer, Appellant lodged no further objections to Woodberry's testimony. There is, therefore, no preserved contemporaneous objection for the Court to review.

Woodberry testify his son was diagnosed with schizophrenia, was passive, and had the mind of a thirteen-year-old. None of these descriptions vouch for Colon's credibility or indicate whether he is telling the truth. Furthermore, these descriptions do not reference Colon's reputation. Woodberry's testimony that his son was diagnosed with schizophrenia and has the mind of a thirteen-year-old describe Colon's medical difficulties. Woodberry's personal knowledge of these difficulties are based on his acquaintance with his son's health. Additionally, the word "passive" does not refer to Colon's credibility or reputation. Even assuming for the sake of argument that the word passive does refer to Colon's character, Woodberry used the word to describe his son in the context of his son being diagnosed with schizophrenia and talking to himself. Therefore, the jury was unlikely to draw any inference that Colon being passive relates in any way to his credibility or reputation. The jury was more likely to conclude Colon was a physically and mentally damaged person because of an unfortunate event from his childhood. Therefore, Woodberry's testimony does not constitute bolstering or improper character evidence. Petitioner's request for a Writ of Certiorari should be denied.

II.

The Court of Appeals correctly determined that although Ricky Woodberry's testimony was hearsay, any error was harmless and did not prejudice Petitioner.

Next, Petitioner argues the Court of Appeals erred in holding that Woodberry's testimony, while constituting hearsay[4], was insignificant in relation to the case overall and therefore any error was harmless. In support of this claim, Petitioner argues Woodberry was unqualified to provide medical testimony about the effect of Colon's previous injuries on his

[4] The State disagrees with the Court of Appeals finding that Woodberry's testimony was hearsay. Woodberry's statements were not offered to prove the truth of the matter asserted. The State did not offer Woodberry's testimony to prove that Colon was shot while standing outside of his apartment building in Brooklyn, New York. Woodberry's statements were offered to prove Colon suffered from mental deficiencies because of an injury he suffered during childhood, not to prove the specific details regarding how Colon was shot.

mental status. Petitioner maintains the effect of this testimony was to suggest that Petitioner controlled Colon. Petitioner's argument is without merit. The Court of Appeals properly affirmed the trial court's judgement, because any error in the admission of Woodberry's testimony was harmless and did not prejudice Petitioner.

"Whether an error is harmless depends on the circumstances of the particular case." Thompson, 352 S.C. 552, 562, 575 S.E.2d 77, 83 (Ct. App. 2003). "No definite rule of law governs this finding; rather, the materiality and prejudicial character of the error must be determined from its relationship to the entire case." State v. Mitchell, 286 S.C. 572, 573, 336 S.E.2d 150, 151 (1985). "An appellate court generally will decline to set aside a conviction due to insubstantial errors not affecting the result." State v. Black, 400 S.C. 10, 27, 732 S.E.2d 880, 890 (2012). "Error is harmless when it could not reasonably have affected the result of the trial." Mitchell, 286 S.C. at 573, 336 S.E.2d at 151 (quoting State v. Key, 256 S.C. 90, 180 S.E. 2d 888 (1971)). To warrant reversal, the admission of evidence must not only be in error, but also result in prejudice to the appellant. State v. Gault, 375 S.C. 570, 574, 654 S.E.2d 98, 100 (Ct. App. 2007). Accordingly, an appellant must demonstrate "there is a reasonable probability the verdict was influenced by the challenged evidence." Id. The introduction of inadmissible evidence is harmless when the evidence is merely cumulative to other evidence presented without objection. State v. Kirton, 381 S.C. 7, 37-38, 671 S.E.2d 107, 122-23 (Ct. App. 2008).

As an initial matter, Woodberry's statements were not hearsay. Woodberry's description of his son's shooting and subsequent health difficulties were not offered to prove Petitioner committed the alleged robbery, nor were they offered to prove that Colon was schizophrenic. Woodberry's testimony was offered to show that Colon suffered from a mental defect because of a gunshot wound he suffered when he was a child. This was relevant evidence because it assisted

the jury in understanding Colon's difficulties expressing himself on the witness stand. Woodberry's testimony thereby helped to contextualize Colon's testimony.

To the extent Woodberry's testimony contained any hearsay, it indicated no more than Colon suffered from a mental defect, which already was attested to without objection by Investigator Williams. Investigator Williams explained three separate times Colon was "a little mentally challenged." (R.106.) Accordingly, Woodberry's testimony was cumulative to evidence that was already presented to the jury without objection. Additionally, Woodberry's testimony was an insignificant detail in relation to the case overall. Woodberry's statements regarding Colon's mental condition did not implicate Petitioner as a participant in the robbery nor did they vouch for Colon's credibility. If anything, Woodberry's statement that Colon was schizophrenic may have detracted from Colon's credibility. Therefore, any error in the admission of Woodberry's testimony was harmless.

Moreover, Petitioner did not suffer any prejudice from Woodberry's testimony. Not only was Petitioner not prejudiced by Woodberry describing Colon's medical condition, Petitioner used the testimony he previously sought to exclude - that Colon was easily led and usually says yes - to his advantage in closing argument. Petitioner argued in closing:

> I don't think there is evidence of [Petitioner's] guilt. I think there is either clear evidence that he is not guilty or there is really no evidence as to what happened because we don't know what Mr. Colon is really saying. He just agrees with whatever anyone tells him to say.

(R. 200, lines 10-16). The trial judge ruled prior to Woodberry's testimony that he could not testify Colon was easily led or usually says yes. Woodberry complied with that restriction and yet Petitioner attacked Colon's credibility with the same testimony he sought to exclude. (R. 126). Therefore, even if Woodberry was permitted to tell the jury that Colon was easily led,

Petitioner was not prejudiced because he used the same facts to his advantage. Petitioner's request for a Writ of Certiorari should be denied.

III.

The Court of Appeals correctly determined Petitioner did not preserve his argument for appeal that Ricky Woodberry's testimony was outside the scope of lay witness testimony.

Petitioner contends the Court of Appeals erred in holding his argument regarding Woodberry's testimony being outside the scope of a lay witness was not preserved for appeal. On the contrary, the Court of Appeals correctly held Petitioner failed to preserve this argument for appeal because it was not raised to the trial court. Even assuming for the sake of argument that Petitioner did raise an objection on the grounds of improper lay witness testimony, Petitioner did not ask for a curative instruction after Woodberry's testimony, nor did he move for a mistrial. Perhaps most significantly, Petitioner did not object any further as Woodberry continued to testify about Colon's medical condition.

"In order for an issue to be preserved for appellate review, it must have been raised to and ruled upon by the trial judge. Issues not raised and ruled upon in the trial court will not be considered on appeal." State v. Dunbar, 356 S.C. 138, 142, 587 S.E.2d 691, 693 (2003). A party may not argue one ground at trial and an alternate ground on appeal. State v. Prioleau, 345 S.C. 404, 548 S.E.2d 213 (2001). "Our law is clear that a party must make a contemporaneous objection that is ruled upon by the trial judge to preserve an issue for appellate review." State v. Sheppard, 391 S.C. 415, 420-21, 706 S.E.2d 16, 19 (2011). A party need not use the exact name of a legal doctrine in order to preserve it, but it must be clear that the argument has been presented on that ground. State v. Russell, 345 S.C. 128, 546 S.E.2d 202 (Ct. App. 2001). "When an objecting party is sustained, the trial court has rendered a favorable ruling, and therefore, it becomes necessary that the sustained party move to cure, or move for a mistrial if such a cure is

insufficient, in order to create an appealable issue." State v. Wilson, 389 S.C. 579, 583, 698 S.E.2d 862, 864 (Ct. App. 2010).

To determine whether Petitioner properly preserved his argument for appeal, it is instructive to review the objection that Petitioner placed on the record. Petitioner summarized his objection as follows: "So I guess to summarize, my grounds would be hearsay, improper character evidence of a witness, and relevance." (R. 120, lines 10-12). Petitioner did not cite improper lay witness testimony as one of his grounds for objection. Therefore, this particular ground for objection was not raised to or ruled upon by the trial court and thus is not preserved for consideration on appeal. Petitioner did lodge a general objection during Woodberry's direct testimony that was sustained. The record is unclear as to exactly the basis of Petitioner's objection. Petitioner's statement: "Your Honor, I would renew my previous objection" would seem to indicate that Petitioner was objecting on the aforementioned grounds of hearsay, improper character evidence, and relevance. (R. 120, 128). Even assuming for the sake of argument that Petitioner was objecting on the basis of Woodberry's statements being outside the scope of proper lay witness testimony, Petitioner did not object to Woodberry's continued testimony on the subject of his son's health. Furthermore, Petitioner didn't move to strike any testimony, ask for a curative instruction, or move for a mistrial. Therefore, there is no appealable issue preserved for this Court to consider.

Even if Petitioner had appropriately preserved this issue for appeal, Woodberry's statements about his son's health were not medical testimony. Woodberry was not offering a professional diagnosis of Colon's schizophrenia. Woodberry was offering a description of Colon's mental defects that were rationally based on his observations of his son. The Court of

Appeals correctly ruled that this issue was not properly preserved for appeal. Petitioner's request for a Writ of Certiorari should be denied.

CONCLUSION

For all the foregoing reasons, it is respectfully submitted that the Petition for a Writ of Certiorari should be denied.

Respectfully submitted,

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PROOF OF SERVICE

I, Sally Ellison, certify that I have served the within Return to Petition for Writ of Certiorari on Petitioner by sending two copies of the same to:

R. Bentz Kirby, Esquire
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I further certify that all parties required by Rule to be served have been served.
This 29th day of May, 2018.

Sally Ellison

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