STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Richland County

Honorable Jocelyn J. Newman, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

DARIUS WALKER,

APPELLANT

APPELLATE CASE NO. 2017-002559

INITIAL BRIEF OF APPELLANT

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STATEMENT OF ISSUE ON APPEAL

Did the trial judge abuse her discretion by refusing to admit a letter written by Appellant's codefendant, Latrell Strong, in which Strong exculpated Appellant and admitted his own guilt for the burglary and larceny for which Appellant was indicted and tried, where this letter was properly authenticated pursuant to Rule 901, SCRE, and admissible as an out of court statement against interest pursuant to Rule 804(b)(3), SCRE, and as evidence of third party guilt?

STATEMENT OF THE CASE

A Richland County Grand Jury indicted Appellant on December 15, 2015 for first degree burglary, grand larceny, and possession of a stolen vehicle. R. *. His case was called to trial on October 16, 2017 before the Honorable Jocelyn Newman, and a jury. Tr. 1. Assistant Solicitors Richard Cathcart and Jeremiah Shellenberg represented the state, and Aimee Zmroczek represented Appellant. Tr. 1.

On October 18, 2017, the jury found Appellant guilty as indicted. Tr. 375, ll. 11-23. He was sentenced to thirty-six years for first degree burglary, five years consecutive for grand larceny, and thirty days consecutive for possession of a stolen vehicle. Tr. 389, ll. 1-8. The aggregate sentence was forty-one years and thirty days imprisonment.

This appeal follows.

STANDARD OF REVIEW

"The admission of evidence is within the discretion of the trial court and will not be reversed absent an abuse of discretion." State v. Hatcher, 392 S.C. 86, 91, 708 S.E.2d 750, 753 (2011) (quoting State v. Pagan, 369 S.C. 201, 208, 631 S.E.2d 262, 265 (2006)) (internal quotation marks omitted). "An abuse of discretion occurs when the conclusions of the trial court either lack evidentiary support or are controlled by an error of law." Id. (quoting Pagan, 369 S.C. at 208, 631 S.E.2d at 265) (internal quotation marks omitted); see also State v. Brockmeyer, 406 S.C. 324, 340, 751 S.E.2d 645, 653 (2013).

ARGUMENT

The trial judge abused her discretion by refusing to admit a letter written by Appellant's codefendant, Latrell Strong, in which Strong exculpated Appellant and admitted his own guilt for the burglary and larceny for which Appellant was indicted and tried, where this letter was properly authenticated pursuant to Rule 901, SCRE, and admissible as an out of court statement against interest pursuant to Rule 804(b)(3), SCRE, and as evidence of third party guilt.

Facts at Trial

Around one o'clock on the afternoon of July 21, 2015, Julie Rieger was driving her young daughter in a golf cart to the pool at the Rockbridge Country Club, which was about a mile away from their home. Tr. 18, l. 1 – 19, l. 14. As they passed by their next door neighbor's house, Rieger saw a car in the driveway that she had never seen before. She also saw two young black males walking onto the neighbor's "stoop." The men opened the screen door, looked around, and began knocking on the front door. Their behavior "registered as strange" and "raised the hairs on the back of [Rieger's] neck." Tr. 23, ll. 1-20. No other vehicles were in the driveway except for this "odd, unusual car" and Rieger knew her neighbors, the Johnsons, were not home. Tr. 23, l. 21 – 24, l. 2.

After passing the Johnsons' house, Rieger called her husband, told him what she saw, and asked him to call the Forest Acres Police Department to "come check it out." Tr. 24, ll. 3-11. After speaking with her husband, Rieger turned around and drove back by the Johnsons' house. The two men were no longer standing on the "stoop." However, Rieger noticed that the gate on the left side of the house, which led to the backyard, was open. Tr. 25, ll. 1-7. The unusual vehicle was still in the driveway. Tr. 25, ll. 8-9.

When Rieger returned to her house, her husband was standing in the driveway and was on the telephone. Tr. 26, l. 24 – 27, l. 11. Rieger then called her other neighbor, Sally Metts, who also lived next door to the Johnsons, told her what she observed, and asked her to "go to the back room of her house and see if she could see anything going on in the backyard." Tr. 27, ll. 15-23.

After speaking with Rieger, Sally Metts went into her backyard and walked to the fence that separated her yard from the Johnsons' yard. Through the bushes, Metts saw two black males coming out of the back of the Johnsons' house carrying a large flat screen television. Tr. 48, l. 4 – 49, l. 19. She then went back inside her house to a room with a window that faces the side of the Johnsons' house. From there, she saw two black males "going past [her] fast with a TV." They were holding the television at the bottom, walked through the gate at the entrance of the backyard, and eventually "threw" the television into the backseat of the car that was parked in the driveway. Tr. 50, l. 20 – 52, l. 13.

As the men were getting into the car to leave, Detective Baxter, who at the time was assigned to the patrol unit with the Forest Acres Police Department, pulled into the Johnsons' driveway, blocking in the car that was parked there. Baxter saw two black males standing by the car. When the men saw Baxter, they took off running into the Johnsons' backyard and ultimately "hopped the fence." Tr. 53, ll. 2-19; Tr. 76, ll. 3-9.

For the next forty-five minutes numerous officers with the Forest Acres Police Department and the Richland County Sheriff's Department, along with a K-9, chased the two black males until they were ultimately apprehended. Tr. 96, l. 16 – 100, l. 20; Tr. 108, l. 2 – 114, l. 12; Tr. 121, l. 7 – 128, l. 20; Tr. 136, l. 5 – 139, l. 22; Tr. 176, l. 10 – 181, l. 10. Appellant was caught in the backyard of a residence and held at gunpoint until he was handcuffed. Tr. 127, l. 6

– 128, l. 3; Tr. 137, l. 23 – 139, l. 10. His codefendant, later identified as Latrell Strong, was apprehended by K-9 Indy hiding under a car parked in front of the house where Appellant was arrested. Tr. 128, ll. 4-13; Tr. 139, ll. 14-18; Tr. 140, l. 23 – 141, l. 13; Tr. 180, l. 13 – 181, l. 17.

The car parked in the Johnsons' driveway was reported stolen earlier that morning. Tr. 96, ll. 8-14. On the backseat of the car, officers found two flat screen televisions, two laptops, two iPhones, an iPad, two iPhone cases, headphones, and other electronic accessories. Christopher Johnson identified these items as being stolen from his home. Tr. 154, l. 7 – 157, l. 22. Latrell Strong's DNA, and that of an unidentified second person, was found on several of the stolen electronics. However, Appellant was excluded as a possible contributor to this DNA. Tr. 227, l. 10 – 228, l. 13; Tr. 232, l. 21 – 233, l. 10.

Julie Rieger and Sally Metts were both shown two photographic lineups by law enforcement. In the first lineup, Rieger identified Latrell Strong as one of the individuals she saw at the Johnsons' residence. In the second lineup, she identified a second person she believed was involved in the burglary. While Appellant's photograph was included in this second lineup, Rieger identified another male as being involved. Tr. 37, l. 12 – 39, l. 15. Sally Metts could not identify anyone in either lineup. Tr. 54, l. 19 – 55, l. 1; Tr. 60, l. 2 – 61, l. 11; Tr. 292, l. 1 – 295, l. 6.

Appellant's defense at trial as to the burglary and larceny was that he was an accessory after the fact. He argued Latrell Strong and a second individual, who Rieger identified in the lineup and who possibly contributed to the unidentified DNA that was found on the stolen electronics, committed the burglary and called Appellant for a ride after the fact. Tr. 84, ll. 1-4 (October 16, 2017); Tr. 341, l. 15-22. Appellant admitted to being guilty of possession of a stolen vehicle. Tr. 337, l. 24 – 338, l. 3. His DNA was found on the steering wheel and gearshift

of the stolen vehicle as well as on a drink bottle found inside the car. Tr. 225, l. 1 – 226, l. 18; Tr. 228, l. 21 – 229, l. 1.

How the Issue was Presented Below

During his presentation of evidence, Appellant sought to introduce a letter written by his codefendant, Latrell Strong, in which Strong exculpates Appellant and maintains Appellant was an accessory after the fact. Tr. 34, l. 15 – 37, l. 8 (October 16, 2017); Tr. 241, l. 24 – 243, l. 6; See R. * (Defense Exhibit No. 20 – Letter and Envelope). The undated letter was postmarked on September 7, 2016 and mailed to Appellant's defense counsel. The envelope lists the return address as Latrell Strong, #608448, A.S.G. Detention Center, 201 John Mark Dial Dr., Columbia, SC 29209. R. * (Defense Exhibit No. 20 – Letter and Envelope). The letter reads:

> I Latrell Strong is writeing this letter on the behalf of the defendant Darius Walker [Appellant] witch is my co-defendant of a burglary 2nd that he knew nothing about until after the fact. The burglary 2nd was my (Latrell Strong) doing. I simply called the defendant Darius Walker for a ride. When he came to pick me up I still did not say anything about what I had done until the police car pulled up to the residence. By then it was fare to late. I am just writeing this letter to own up to my actions like a man and put all this behind me. If you would like to get in contact with me the address to where I am being held is on the front of this letter.

R. * (Defense Exhibit No. 20 – Letter and Envelope).

Appellant attempted to admit the letter by calling Strong as a witness. However, Strong invoked his Fifth Amendment right to remain silent and refused to answer any questions. Tr. 244, l. 17 – 246, l. 12. Since Strong was an unavailable witness, Appellant then proffered several witnesses to authenticate the letter and envelope.

Christina Metze, defense counsel's paralegal at A.J.Z. Law Firm, testified *in camera* that she obtained Defense Exhibit No. 20, the letter and envelope from Latrell Strong, from the

office's PO box. She opened the letter, scanned the document, and made a note in the case file. Tr. 259, l. 5 – 260, l. 10.

Washava Moyd, the division manager of operations at the Alvin S. Glenn Detention Center (ASGDC), testified *in camera* that Latrell Strong's inmate number was 608448, which matched the inmate number listed on the return address. Tr. 263, l. 15 – 264, l. 10. She also testified that Strong was incarcerated at the ASGDC from July 21, 2015 until March 27, 2017 and, therefore, was incarcerated on September 7, 2016, the date the letter was postmarked. Tr. 264, l. 11 – 265, l. 1. She further explained the process by which inmates at the ASGDC send mail. Specifically, an inmate would give the mail to a unit officer, who in turn would give it to a mail clerk, who stamps the back of the envelope indicating that it came from the ASGDC and then takes it to the post office. Tr. 265, ll. 2-17. Moyd identified Defense Exhibit No. 20 as coming from the ASGDC based on the stamp on the back of the envelope. Tr. 265, l. 18 – 266, l. 3. She also clarified that inmates receive pre-stamped envelopes, meaning all of the envelopes come with a stamp already on them. Tr. 266, ll. 4-19.

Lastly, Investigator John Carwell identified the DNA consent to search form and the advice of rights form, that were marked as Defense Exhibit Nos. 18 and 19, respectively, that were signed by Latrell Strong during the course of law enforcement's investigation. Carwell testified that Strong signed these documents in his presence. Tr. 271, ll. 6-21.

Defense counsel argued, based on this evidence, that Appellant had sufficiently authenticated the letter and envelope, marked as Defense Exhibit No. 20, pursuant to Rule 901, SCRE. She emphasized subsection (b)(3) of Rule 901 in support of her argument and asserted the jury could compare the known signature of Latrell Strong on Defense Exhibit Nos. 18 and 19 with the signature that appeared on the letter. Counsel also cited to subsection (b)(4) and argued

the substance of the letter, along with its appearance and other distinctive characteristics, including the use of a pre-stamped envelope, the ASGDC stamp on the back of the envelope, the use of Strong's inmate number, the fact that it was postmarked while Strong was incarcerated, and the actual content of the body of the letter, established its authenticity. Counsel concluded that it was ultimately a jury question. Tr. 280, l. 4 – 282, l. 14.

The trial judge ruled the letter was inadmissible because it was not properly authenticated. While she acknowledged Strong's signature on Defense Exhibit Nos. 18 and 19 "appear[s] to be similar to" the signature on the letter, she stated the "problem is the signature and the letter appear to be in different handwriting. And the court has heard no testimony from any witness regarding the printed portion of this letter and any attempt to authenticate the printed portion of the letter." The judge asserted Appellant failed to authenticate the content of the letter "because for all anybody knows, his [Strong's] signature is on a blank piece of paper and somebody fills it [in] and mails it from the jail." Tr. 282, l. 15 – 283, l. 14. Consequently, based on the totality of the circumstances, the judge concluded Defense Exhibit No. 20 was not sufficiently authenticated and, therefore, not admissible. Tr. 283, ll. 15-22.

Discussion

The trial judge abused her discretion by refusing to admit Defense Exhibit No. 20, the letter and envelope from Latrell Strong in which Strong exculpates Appellant and admits his own guilt, since this exhibit was properly authenticated pursuant to Rule 901, SCRE, and was admissible pursuant to Rule 804(b)(3), SCRE, and as evidence of third party guilt.

Authentication

"It is black letter law that evidence must be authenticated or identified in order to be admissible." State v. Brown, 424 S.C. 479, 488, 818 S.E.2d 735, 740 (2018) (citing State v.

Rich, 293 S.C. 172, 173, 359 S.E.2d 281, 281 (1987) (noting prior to the adoption of the rules of evidence that an exception to the hearsay rule does not "absolve the offering party from the usual requirements of authentication"). "Upon adoption of the South Carolina Rules of Evidence, this common law rule was codified at Rule 901, SCRE." Id. (citing State v. Anderson, 386 S.C. 120, 128-132, 687 S.E.2d 35, 39-41 (2009)).

Rule 901(a), SCRE, states, "The requirement of authentication as a condition precedent to admissibility is satisfied by evidence sufficient to support a finding that the matter is what its proponent claims." Although not exhaustive, Rule 901 further provides examples of authentication or identification which conform with the requirements of the rule. Rule 901(b), SCRE. Relevant here are subsections three and four. Subsection three states, "Comparison by Trier or Expert Witness. Comparison by the trier of fact or by expert witnesses with specimens which have been authenticated." Rule 901(b)(3), SCRE. Subsection four states, "Distinctive Characteristics and the Like. Appearance, contents, substance, internal patterns, or other distinctive characteristics, taken in conjunction with circumstances." Rule 901(b)(4), SCRE.

"The proof of authenticity required preliminary to the introduction of an instrument in evidence need not be direct proof. Authenticity of documentary evidence may be shown, so as to render it admissible in evidence, by indirect or circumstantial evidence." Winburn v. Minnesota Mut. Life Ins. Co., 261 S.C. 568, 576-577, 201 S.E.2d 372, 376 (1973) (citing State v. Wilson, 246 S.C. 580, 145 S.E.2d 20 (1965)). "A writing may possess certain distinguishing characteristics which, coupled with circumstances, are sufficient to identify its source or author." § 17:6. Authentication by circumstantial evidence: Distinguishing characteristics, Trial Handbook for South Carolina Lawyers § 17:6 (citing State v. Wilson, 246 S.C. 580, 145 S.E.2d 20 (1965)). "For example, a letter indicating it is in reply to a letter from its addressee is

generally deemed to be sufficiently authenticated." Id. (citing Leesville Mfg. Co. v. Morgan Wood & Iron Works, 75 S.C. 342, 55 S.E. 768 (1906)). "Likewise, if the contents of a letter reference matters which only the person signing it would have reason to know, that is ordinarily sufficient proof of authorship." Id. (citing State v. Hightower, 221 S.C. 91, 69 S.E.2d 363 (1952) and McCormick, Handbook of the Law of Evidence (2d ed.) § 225).

"[T]he burden to authenticate . . . is not high" and requires only that the proponent "offer[] a satisfactory foundation from which the jury could reasonably find that the evidence is authentic." Deep Keel, LLC v. Atl. Private Equity Grp., LLC, 413 S.C. 58, 64-65, 773 S.E.2d 607, 610 (Ct. App. 2015) (quoting United States v. Hassan, 742 F.3d 104, 133 (4th Cir. 2014)) (alternations in original).

Here, Appellant presented sufficient evidence to authenticate the letter and envelope marked as Defense Exhibit No. 20 for its admissibility. Pursuant to Rule 901(b)(3), the jury could have compared the signature on Defense Exhibit No. 20 with the known signature of Latrell Strong on the DNA consent to search form and the advice of rights form, that were marked as Defense Exhibit Nos. 18 and 19, respectively. It was up to the jury to determine whether the signature on the letter was that of Latrell Strong based on its own comparison with these documents. The trial judge abused her discretion by ruling Appellant failed to authenticate the "printed portion of the letter" because Appellant did not introduce any testimony or documentary evidence of Strong's known "printed" handwriting as opposed to his signature. Even if Strong did not write the printed portion of the letter, his signature at the bottom of the letter indicated he adopted or approved of the contents of the letter, just as law enforcement officers often write out a statement for a witness and the witness adopts the statement by signing the bottom. This was a factual issue for the jury to determine.

Additionally, pursuant to Rule 901(b)(4), the appearance, contents, substance, and distinctive characteristics of the letter and envelope established its authenticity. The body of the letter identified Appellant as Strong's codefendant and discussed Strong's own guilt for the burglary and larceny for which he and Appellant were both charged. The envelope was identified as a pre-stamped envelope inmates at the Alvin S. Glenn Detention Center are given and was stamped by the mail clerk at the Alvin S. Glenn Detention Center with the facility's disclaimer. Furthermore, the letter was post-marked while Latrell Strong was incarcerated at the ASGDC and noted his correct inmate number. Therefore, Appellant met the low burden of proof necessary to authenticate Defense Exhibit No. 20. The trial judge erred by finding otherwise.

Hearsay

In State v. Doctor, 306 S.C. 527, 413 S.E.2d 36 (1992), our Supreme Court first adopted the rule that out of court statements against penal interest made by an unavailable declarant are admissible at trial. State v. Kinloch, 338 S.C. 385, 388, 526 S.E.2d 705, 706 (2000). "However, if offered to exculpate the accused in a criminal trial, they are admissible only if corroborating evidence **clearly** indicates the trustworthiness of the statements." Id. (emphasis in original); See State v. Forney, 321 S.C. 353, 468 S.E.2d 641 (1996).

Rule 804(b)(3), SCRE, codified this exception to the hearsay rule. State v. Cooper, 334 S.C. 540, 514 S.E.2d 584 (1999). Rule 804(b)(3) provides:

> **Statement Against Interest.** A statement which was at the time of its making so far contrary to the declarant's pecuniary or proprietary interest, or so far tended to subject the declarant to civil or criminal liability, or to render invalid a claim by the declarant against another, that a reasonable person in the declarant's position would not have made the statement unless believing it to be true. A statement tending to expose the declarant to criminal liability and offered to exculpate the accused is not admissible unless corroborating circumstances clearly indicate the trustworthiness of the statement.

In Kinloch, our Supreme Court asserted that the party offering the statement bears a "formidable burden" in meeting the requirements of Rule 804(b)(3), SCRE. Kinloch, 338 S.C. 385, 388, 526 S.E.2d 705, 706-707 (citing United States v. Lowe, 65 F.3d 1137, 1146 (4th Cir. 1995)). The Court explained, "[T]he rule does not require that **the information within the statement** be clearly corroborated, it means only that there be corroborating circumstances which clearly indicate the trustworthiness of the statement itself, i.e., that the statement was actually made." Id. at 389, 526 S.E.2d at 707 (emphasis in original). "The corroboration requirement is a preliminary determination as to the statement's admissibility, not an ultimate determination about the statement's truth." Id. (citing 5 Weinstein's Federal Evidence, § 804.06(5)(a) (2d Ed.1999)).

Here, Appellant presented sufficient evidence to establish "the statement was actually made." The same evidence used to authenticate Defense Exhibit No. 20 established the letter was written by Latrell Strong, whether its content was true or not. Again, the bottom of the letter contained Strong's signature and there was evidence from which the jury could have concluded this was in fact Strong's signature. See Defense Exhibit Nos. 18 and 19. The return address on the envelope contained Strong's correct inmate number and indicated he was incarcerated at the ASGDC. Moreover, Appellant presented evidence Strong was incarcerated at the ASGDC on the date the letter was postmarked and that the envelope was a pre-stamped envelope given to inmates at the facility and was stamped on the back with the facility's disclaimer. These are corroborating circumstances that clearly indicate the trustworthiness of the statement.

Not only did Appellant establish the trustworthiness of the statement, he also presented evidence Strong was an unavailable witness because he invoked his Fifth Amendment right to remain silent and that the statement itself was against Strong's penal interest since in the letter

Strong admitted sole guilt for the burglary and larceny for which he and Appellant were charged and exculpated Appellant.

Consequently, Defense Exhibit No. 20 was admissible under Rule 804(b)(3), SCRE, and the trial judge abused her discretion by refusing to admit it for the jury's consideration.

Third Party Guilt

The admissibility of evidence of third party guilt in South Carolina is governed by the rule set forth in State v. Gregory, 198 S.C. 98, 16 S.E.2d 532 (1941). In Gregory, our Supreme Court stated:

> [T]he evidence offered by accused as to the commission of the crime by another person must be limited to such facts as are **inconsistent with his own guilt**, and to such facts **as raise a reasonable inference or presumption as to his own innocence**; evidence which can have (no) other effect than to cast a bare suspicion upon another, or to raise a conjectural inference as to the commission of the crime by another, is not admissible.... But before such testimony can be received, there must be such proof of connection with it, such a train of facts or circumstances, as tends clearly to point out such other person as the guilty party. Remote acts, disconnected and outside the crime itself, cannot be separately proved for such a purpose.

198 S.C. at 104-105, 16 S.E.2d at 534-535 (internal citations omitted) (emphasis added); See State v. Burgess, 391 S.C. 15, 22-23, 703 S.E.2d 512, 516 (Ct. App. 2010).

Once properly authenticated pursuant to Rule 901, SCRE, which Appellant did, the letter and envelope marked as Defense Exhibit No. 20 were admissible pursuant to the doctrine on third party guilt. In the letter, Strong admits sole responsibility for the burglary and larceny for which Appellant was indicted and tried. Again, the letter reads:

> I Latrell Strong is writeing this letter on the behalf of the defendant Darius Walker [Appellant] witch is my co-defendant of a burglary 2nd that he knew nothing about until after the fact. The burglary 2nd was my (Latrell Strong) doing. I simply called the defendant Darius Walker for a ride. When he came to pick me up I still did not say anything about what I had done until the police car pulled up to the residence. By then it was fare to late. I am just writeing this letter to own up to my actions like a man and put all this behind me. If you would

like to get in contact with me the address to where I am being held is on the front of this letter.

R. * (Defense Exhibit No. 20 – Letter and Envelope).

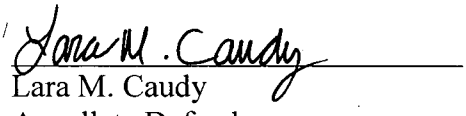
Strong clearly states Appellant was merely an accessary after the fact in that he came to the scene after Strong had already committed the burglary because Strong called Appellant for a ride. This evidence is inconsistent with Appellant's guilt for the indicted offenses and raises a reasonable inference that he is innocent. It was up to the jury to determine the credibility of this evidence.

Because the trial judge abused her discretion by refusing to admit Defense Exhibit No. 20, Appellant respectfully requests this Court reverse his convictions and sentence and remand for a new trial.

CONCLUSION

Based on the foregoing argument, Appellant respectfully requests this Court reverse his convictions and sentence and remand for a new trial.

Respectfully submitted,



Lara M. Caudy
Appellate Defender

ATTORNEY FOR APPELLANT

This 21st day of December, 2018.

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Richland County

Honorable Jocelyn J. Newman, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

DARIUS WALKER,

APPELLANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the Initial Brief of Appellant and Designation of Matter in the above referenced case has been served upon J. Benjamin Aplin, Esquire, at the Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201; and a copy of the Initial Brief of Appellant and Designation of Matter has been served upon Darius Walker, #355319, at McCormick Correctional Institution, 386 Redemption Way, McCormick, SC 29899, this 21st day of December, 2018.

Lara M. Caudy
Lara M. Caudy
Appellate Defender

ATTORNEY FOR APPELLANT

SUBSCRIBED AND SWORN TO before me
this 21st day of December, 2018.

Scott Lerette (L.S)
Notary Public for South Carolina
My Commission Expires: September 27, 2028.