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November 26, 2019

Clerk of Court, South Carolina Supreme Court
Case # 2018-CP-14-0136

Roosevelt Sabb Jr, v State of South Carolina

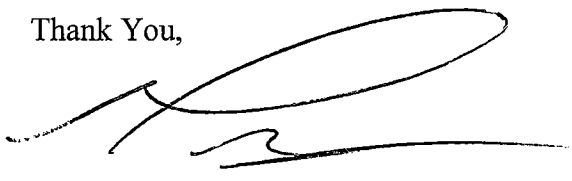
Please see the included Notice of Appeal. I have also forwarded by separate mail copies to:

The Clarendon County Clerk of Court
The Office of the Attorney General of South Carolina
SC Office of Indigent Defense / Commission of Indigent Defense
The Honorable Kristi F. Curtis

Please file the included NOTICE OF APPEAL for the case captioned.

Attorney Timothy L. Griffith was appointed as PCR Council and not retained and will not be handling the Appeal.

Thank You,



Timothy L. Griffith, Esquire

RECEIVED

DEC 05 2019

S.C. SUPREME COURT

**NOTICE OF APPEAL FROM A PCR DENIAL BY THE COURT OF
COMMON PLEAS**

THE STATE OF SOUTH CAROLINA
In Supreme Court of SC

APPEAL FROM CLARENDON COUNTY
Court of Common Pleas

KRISTI F. CURTIS, Circuit Court Judge

Case # 2018-CP-14-0136

RECEIVED

DEC 05 2019

S.C. SUPREME COURT

The State,

Respondent,

v.

Roosevelt Sabb Jr,

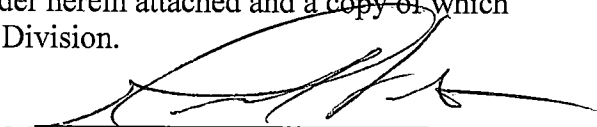
Appellant.

NOTICE OF APPEAL

Roosevelt Sabb Jr, appeals the decision of the Court, on March 27, 2019, where Mr. Sabb was denied his request for Post-Conviction Relief. Mr. Sabb was represented at the hearing by Timothy L. Griffith, Attorney at Law who files this notice on behalf of the Appellant. The order herein attached and a copy of which is also forwarded to the SCCID Appellate Division.

Dated

11/26/17


Timothy L. Griffith, Esquire
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Sumter, South Carolina 29150
Telephone: (803)607-9087
Attorney for Appellant (relieved)
Will not be representing on appeal

Other Counsel of Record:
Janell H. Gregory, Esquire
Senior Assistant Attorney Deputy General
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PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In the South Carolina Court of Appeals

APPEAL FROM CLARENDON COUNTY
Court of Common Pleas

KRISTI F. CURTIS, Circuit Court Judge

Case #2018-CP-14-0136

RECEIVED

DEC 05 2019

S.C. SUPREME COURT

The State,

Respondent,

v.

Roosevelt Sabb Jr,

Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on the Office of the Attorney General of South Carolina, PCR Division, by U.S. Postal Service, postage prepaid, to P.O. Box 11549, Columbia, S.C. 29211, on November 26, 2019

I received a copy of the Notice of Appeal
on this ____ day of _____, 2019

Office of the Attorney General
PCR Division



Timothy L. Griffith
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Attorney for Appellant

STATE OF SOUTH CAROLINA)
COUNTY OF CLARENDON)

IN THE COURT OF COMMON PLEAS
FOR THE THIRD JUDICIAL CIRCUIT

Roosevelt Sabb, Jr., #356248,)
Applicant,)

2018-CP-14-0136

v.)

ORDER OF DISMISSAL

State of South Carolina,)
Respondent.)

FILED FOR THE CLERK OF COURT
CLARENDON COUNTY SOUTH CAROLINA

This matter comes before the Court by way of an application for post-conviction relief filed on March 29, 2018, by Roosevelt Sabb, Jr. (Applicant). The State (Respondent) filed a Return on August 16, 2018, requesting an evidentiary hearing. An evidentiary hearing into the matter was convened on March 27, 2019, at the Sumter County Courthouse. Applicant was present at the hearing and represented by Timothy Griffith, Esquire. Assistant Attorney General Janell H. Gregory of the South Carolina Attorney General's Office appeared on behalf of Respondent. At the hearing, Applicant testified on his own behalf. Shaun C. Kent, Esquire (Counsel) also testified. After a review of the record and all evidence presented, this Court finds Applicant has failed to meet his requisite burden of proof and denies this application.

I. PROCEDURAL HISTORY

The records before this Court establish Applicant is incarcerated with the South Carolina Department of Corrections pursuant to the Clarendon County Clerk of Court's order of commitment. During the October 2014 term, the Clarendon County Grand Jury indicted Applicant for murder (2014-GS-14-0347). Assistant Solicitor Christopher DuRant of the Third Circuit Solicitor's Office prosecuted the case.

On October 3, 2017, Applicant appeared with Counsel before the Honorable George M. McFadden, Jr. and, pursuant to a negotiated plea, pled guilty to the lesser-included offense of voluntary manslaughter. Pursuant to the negotiation, Judge McFadden sentenced Applicant to fifteen years imprisonment. Applicant did not appeal his guilty plea or sentence.

II. SUMMARY OF FACTS

Applicant and Keith Allen Smith (Victim) were cousins. On July 5, 2014, Applicant and Victim were at their uncle's residence when they got into an argument. (GP Tr. 6.) There was a physical altercation in the yard, which was broken up by family members. (GP Tr. 6-7.) After the altercation, Victim went inside the residence and Applicant stayed outside. (GP Tr. 7.) When Victim went back outside, the uncle followed him. (GP Tr. 7.) As Victim was standing in the yard, Applicant, who was in his car, revved the engine and accelerated towards Victim hitting him and pinning him between a parked vehicle and Applicant's vehicle. (GP Tr. 7.) After striking Victim, Applicant drove his vehicle down the driveway and parked in a vacant lot across the street from the uncle's residence and waited for law enforcement to arrive. (GP Tr. 7.) Victim was pronounced dead at the scene. (GP Tr. 8.)

III. ALLEGATIONS RAISED

In his application for post-conviction relief, Applicant alleges he is being held in custody unlawfully for the following reasons:

1. Ineffective Assistance of Counsel:
 - a. "Counsel administered fallacious and erroneous advice"
 - i. "Three weeks before the plea date counsel called the applicant and said he had received discovery."
 - ii. "When Applicant called to schedule a meeting to discuss, Applicant was told to 'hold tight' by counsel and did not hear from counsel until a few days before the plea."
 - iii. "When Applicant returned to counsel's office [three days after their initial meeting] counsel wrote 'ten-twelve years' on a dry erase board and told Applicant that if he plead to fifteen years then he could be

- home in ten with good time.”
- iv. “Counsel informed Applicant that if he chose to go to trial it would begin the following day.”
 - v. “Counsel briefly went over partial discovery in the case.”
 - b. “Counsel failed to make a reasonable investigation in the Applicant’s case”
 - i. “Four days before the plea counsel informed Applicant that he had not spoken to the Solicitor or been given a plea offer.”
 - c. Counsel failed to subject prosecution’s case to meaningful adversarial challenge.
 - i. Counsel never discussed any mitigating facts.
 - ii. Counsel never discussed any possible defenses.
 - iii. Counsel never discussed any favorable witnesses.

An evidentiary hearing was held on March 27, 2019, Applicant proceed on the following grounds for relief:

- 1. Ineffective Assistance of Counsel
 - a. Counsel failed to meet with Applicant and review discovery;
 - b. Counsel failed to investigate Applicant’s case;
 - c. Applicant accepted the State’s plea offer because Counsel failed to prepare for trial.

III. TESTIMONY PRESENTED AT THE EVIDENTIARY HEARING

Applicant’s Testimony

At the beginning of the hearing, this Court reviewed with Applicant the consequences if post-conviction relief is granted in his case. This Court warned Applicant that he would be open to his original murder charge proceeding forward to trial and potentially being sentenced to thirty years to life in prison. Applicant testified he understood the risk and wanted to proceed forward with his post-conviction relief hearing.

During the evidentiary hearing, Applicant testified on his own behalf. Applicant testified he discussed the risks of proceeding with his post-conviction relief hearing with his attorney and told his attorney he wanted to go forward with the application. Applicant testified he was represented by Counsel from 2014 until he pled guilty in 2017. Applicant testified he did not meet with him at all and that he did not see Counsel for thirty-four months. Applicant testified

Counsel called him and told him to come and see him. Applicant testified during that meeting, Counsel showed him an animation produced by the State during discovery. Applicant testified he told Counsel the animation was not accurate and asked Counsel about a lesser charge. Applicant testified Counsel asked for permission to talk to the solicitor regarding a plea offer. Applicant testified Counsel met with Applicant the day before the plea offer and wrote "10-12 years" on the board. Applicant testified Counsel told him he would be home in ten years. Applicant testified Counsel explained the difference between murder and voluntary manslaughter. Applicant testified Counsel gave him no options other than to take the plea. Applicant testified he wanted to go to trial but Counsel was not prepared. Applicant testified Counsel told him they would play the animation over and over again and it would not be good. Applicant testified he would have gone to trial had he known the information Counsel gave him was not correct. Applicant testified Counsel should have challenged the animation because he maintained what occurred was an accident. Applicant testified Counsel did not hire an expert witness. Applicant testified he has met people in prison with less time for the same charge. Applicant testified Counsel told him the day before the trial started he had an option to take a plea or go to trial. Applicant testified Counsel was not prepared to go to trial. Applicant testified that had it not been for Counsel's bad advice and failure to file motions, he would have gone to trial.

On cross-examination, Applicant testified he recalled telling the plea judge he wanted to plead guilty. Applicant testified he recalled telling the plea judge he had time to talk to his lawyer about the case. Applicant testified he recalled telling the plea judge he did not have any complaints about his lawyer. Applicant testified he recalled telling the plea judge his attorney had done everything he wanted him to do. Applicant testified he recalled telling the plea judge he was

pleading guilty freely and voluntarily. Applicant testified he recalled waiving his constitutional rights.

Counsel's Testimony

Counsel also testified at the post-conviction relief hearing. Counsel testified he has been practicing law for twenty years and 80% of that has been in criminal law. Counsel testified he met with Applicant one time at jail prior to Applicant being released on bond. Counsel testified Applicant is a commercial truck driver and he was unable to meet with him because he was not in town. Counsel testified he did not believe the animation from the South Carolina Highway Patrol's Multi-disciplinary Accident Investigation Team (MAIT) animation would be admitted at trial. Counsel testified he took the animation to an expert in accident reconstruction and his opinion was the animation was accurate. Counsel testified Applicant's vehicle had an oil leak and the MAIT investigators were able to follow the oil leak to show Applicant's path of travel. Counsel testified the path of travel showed Applicant swerved in the direction of the victim. Counsel testified the incident occurred on a wet day, so the MAIT investigators were able to find acceleration marks and witnesses indicated Applicant revved his engine prior to hitting victim. Counsel testified because of the swerve marks and acceleration indicated it was not an accident. Counsel testified Applicant maintained it was an accident and they discussed that as a possible defense.

Counsel testified he reviewed discovery with Applicant and the discovery he reviewed with him was more than just the animation. Counsel testified Applicant appeared to understand the evidence against him and their conversations. Counsel testified he discussed with Applicant the uncle being a witness and, at the time prior to the plea, they discussed the uncle's mental stability because he was suffering from brain cancer and has since passed. Counsel testified he discussed the other two witnesses for the State who he felt were not that important. Counsel testified he met

with an expert witness regarding the MAIT investigator's findings and went to the scene himself with his investigator. Counsel testified he also met with the lead law enforcement investigator. Counsel testified his biggest concern was the testimony from the MAIT investigators.

Counsel testified he received a call from the solicitor indicating Applicant's case was being set for trial. Counsel testified he told Applicant he needed to come in because his case was coming up. Counsel testified he met with the solicitor and asked for a plea because he was fearful as to where the case would go. Counsel testified his notes indicate he needed to get murder off the table. Counsel testified Applicant could have entered a plea straight up before an unfavorable judge. Counsel testified it would have been a thirty year sentence for the straight up plea and that it is an 85% offense, so Counsel does not believe he told Applicant he would do ten years. Counsel testified the notes of the meeting were written by the assistant and the notes indicate he reviewed the difference between murder, involuntary manslaughter, and voluntary manslaughter. Counsel testified the notes indicate he told Applicant it was an 85% charge. Counsel testified Applicant and his family met with him and asked Counsel to go back and get a better deal. Counsel testified he was trying to get a 12-13 year offer and testified he may have asked for a ten year offer. Counsel testified he met with the solicitor again and was given a twenty-five year offer, which Applicant declined.

Counsel testified he received a negotiated fifteen year offer for Applicant from the solicitor's office after the investigator on the case passed away. Counsel testified he discussed the fifteen year negotiated offer with Applicant and Applicant did not want it. Counsel testified Applicant wanted a better offer, but that was the best he could do. Counsel testified he believed it was in Applicant's best interest to take the offer because the facts were so bad and the science was

on the State's side. Counsel testified it was Applicant's decision to plead guilty. Counsel testified if Applicant had wanted to proceed to trial he would have taken his case to trial.

On cross-examination, Counsel testified he asked the solicitor's office for involuntary manslaughter and he was shut down quickly. Counsel testified he has a lot of notes indicating Applicant reviewed all of the discovery. Counsel testified Applicant even said he reviewed the discovery with Counsel during the plea colloquy. Counsel testified he believed Applicant would lose at trial and be convicted of murder. Counsel testified he makes it very clear to each client that it is their choice whether to proceed to trial or plead. Counsel testified he agrees with Applicant that they did not meet often, but that was because Applicant was out of state due to his job. Counsel testified he had phone conversations with him and when he met with him in person the meetings lasted three to four hours. Counsel testified he was still working Applicant's case from 2014 until the plea in 2017, but during most of that time there was no movement on the case. Counsel testified as soon as the case was noticed for trial, he told Applicant he needed to come home.

IV. APPLICABLE LAW

In a post-conviction relief action, the applicant bears the burden of proving the allegations in his or her application. Butler v. State, 286 S.C. 441, 334 S.E.2d 813 (1985). Where the application alleges ineffective assistance of counsel as a ground for relief, the applicant must prove that "counsel's conduct so undermined the proper functioning of the adversarial process that the trial cannot be relied upon as having produced a just result." Strickland v. Washington, 466 U.S. 668 (1984); Butler, 286 S.C. 441, 334 S.E.2d 813.

The proper measure of performance is whether the attorney provided representation within the range of competence required in criminal cases. The courts presume that counsel rendered adequate assistance and made all significant decisions in the exercise of reasonable professional

judgment. Strickland, 466 U.S. 668. Applicant must overcome this presumption in order to receive relief. Cherry v. State, 300 S.C. 115, 386 S.E.2d 624 (1989).

Courts use a two-pronged test in evaluating allegations of ineffective assistance of counsel. Id. at 117, 300 S.C. 115. First, the applicant must prove counsel's performance was deficient. Id. Under this prong, courts measure an attorney's performance by its "reasonableness under prevailing professional norms." Id. (citing Strickland, 466 U.S. at 688). Second, any deficient performance must have prejudiced the applicant such that "there is a reasonable probability that, but for counsel's unprofessional errors, the result of the proceeding would have been different." Id. at 117-18, 300 S.C. 115. With respect to guilty plea counsel, the applicant must show there is a reasonable probability that, but for counsel's alleged errors, he would not have pled guilty and would have insisted on going to trial. Hill v. Lockhart, 474 U.S. 52, 59 (1985).

FINDINGS OF FACTS AND CONCLUSIONS OF LAW

This Court viewed the testimony presented at the evidentiary hearing, observed the witnesses presented at the hearing, passed upon their credibility, and weighed the testimony accordingly. Further, this Court has reviewed the Clerk of Court records regarding the subject convictions, the plea transcript, and Applicant's records from the South Carolina Department of Corrections, the application for post-conviction relief, and the legal arguments made by the attorneys. Set forth below are the relevant findings of fact and conclusion of law as required by S.C. Code Ann. § 17-27-80 (2003).

Ineffective Assistance of Counsel

This Court finds Applicant has failed to meet his burden of proving he is entitled to post-conviction relief on any of his allegations of ineffective assistance of counsel. Applicant has failed to prove both deficiency on the part of Counsel and any prejudice therefrom. Moreover, this Court

notes the record reflects the knowing and voluntary nature of Applicant's guilty plea. Furthermore, after observing the witnesses and passing on their credibility, this court finds Counsel's testimony to be credible. By contrast, this Court finds Applicant's testimony lacks credibility.

Counsel failed to meet with Applicant and review discovery

Applicant testified Counsel failed to meet with him for the thirty-four months before the guilty plea. Applicant testified he met with Counsel the day before the guilty plea and Counsel wrote "10-12 years" on the board. Applicant testified he only reviewed partial discovery with Counsel, which included the MAIT animation.

However, Counsel testified he could not meet with Applicant in person because Applicant was a commercial truck driver and constantly out of town. Counsel testified he did communicate with Applicant over the phone while the case was pending. Counsel testified when he was provided notice that Applicant's case was coming up for trial, he called Applicant and told him to come home. Counsel testified there was little movement on his case from 2014-2017, but he was still working it during that time. Counsel testified he met with Applicant to discuss his case and get Applicant's consent to approach the solicitor for a plea. Counsel testified the meetings he had with Applicant lasted three to four hours. Counsel testified he reviewed all of the discovery with Applicant, which included more than the animation. Counsel testified he has notes indicating Applicant received all of the discovery Counsel had in the case.

This Court finds Counsel's testimony with respect to this allegation very credible, whereas Applicant's testimony is not credible. Based on the foregoing, this Court finds Applicant has failed to establish Counsel was deficient or any resulting prejudice from Counsel's alleged deficiency. Therefore, this allegation is denied and dismissed with prejudice.

Counsel failed to investigate Applicant's charge

Applicant contends Counsel was ineffective for failing to investigate. "Criminal defense attorneys have a duty to undertake a reasonable investigation, which at a minimum includes interviewing potential witnesses and making an independent investigation of the facts and circumstances of the case." Edwards v. State, 392 S.C. 449, 456, 710 S.E.2d 60, 64 (2011) (citations omitted). "Although counsel should conduct a reasonable investigation into potential defenses, Strickland does not impose a constitutional requirement that counsel uncover every scrap of evidence that could conceivably help their client." Tucker v. Ozmint, 350 F.3d 433, 442 (4th Cir. 2003) (quoting Green v. French, 143 F.3d 865, 892 (4th Cir. 1998)). "In any ineffectiveness case, a particular decision not to investigate must be directly assessed for reasonableness in all the circumstances, applying a heavy measure of deference to counsel's judgments." Strickland, 466 U.S. at 691; Wiggins v. Smith, 539 U.S. 510, 521-22 (2003). Moreover, "failure to conduct an independent investigation does not constitute ineffective assistance of counsel when the allegation is supported only by mere speculation as to result." Porter v. State, 368 S.C. at 385-86, 629 S.E.2d at 357, abrogated on other grounds by Smalls, 422 S.C. 174, 810 S.E.2d 836 (citing Moorehead v. State, 329 S.C. 329, 334, 496 S.E.2d 415, 417 (1998)).

Here, Counsel testified he went to the scene with his investigator and met with the lead investigator from the law enforcement agency that was assigned to Applicant's case. Counsel testified he consulted with an expert in accident reconstruction regarding the MIAT investigator's animation and findings and the consultation confirmed the MAIT investigator's animation and findings were accurate. Counsel testified Applicant could not maintain the incident was an

accident because of the swerve marks and the engine revving. This Court further finds there was no reasonable basis for Counsel to believe any additional investigation would have been beneficial.

This Court further finds Applicant has failed to establish any resulting prejudice from the alleged deficiency. Applicant failed to testify as to what additional investigation Counsel should have conducted or what benefit he could have realized from any additional investigation. Applicant's bare assertions, without more, do not give rise to the level of proof required for Applicant to meet his burden. See Porter, 368 S.C. at 385-86, 629 S.E.2d at 357 ("Failure to conduct an independent investigation does not constitute ineffective assistance of counsel when the allegation is supported only by mere speculation as to result."). Accordingly, this allegation must be denied and dismissed with prejudice.

Applicant accepted the State's plea offer because Counsel failed to prepare for trial.

Applicant alleges Counsel did not prepare his case for trial and that led to Applicant accepting the State's plea offer. Specifically, Applicant alleges Counsel did not meet with any witnesses, or evaluate any possible defenses or mitigating factors in his case. Applicant testified he had to accept the State's plea offer because he did not feel Counsel was prepared for trial. As an initial matter, this Court finds Counsel's testimony with respect to this issue very credible, whereas Applicant's testimony is not credible.

This Court finds Applicant has failed to establish Counsel was deficient. "There is a strong presumption counsel rendered adequate assistance and exercised reasonable professional judgment in making all significant decision in the case." Ard v. Catoe, 372 S.C. 318, 331, 642 S.E.2d 590, 596 (2007). Moreover, when there is evidence that counsel met with Applicant in preparation for trial and there is no evidence additional preparation on the part of counsel would have affected the outcome at trial, counsel cannot be said to have been ineffective. See Harris v. State, 377 S.C 66,

659, S.E.2d 140 (2008), abrogated on other grounds by Smalls v. State, 422 S.C. 174, 810 S.E.2d 836 (2018). To establish counsel was inadequately prepared, an applicant must present evidence of what counsel could have discovered or what other defenses could have been pursued had counsel been more fully prepared. Jackson v. State, 329 S.C. 345, 495 S.E.2d 768 (1998).

Here, Counsel testified, although he was unable to meet with Applicant in person while the case was pending due to Applicant's job, he was able to discuss Applicant's case with him over the phone. Counsel also testified when Applicant's case was noticed for trial, he met with Applicant multiple times and those meetings lasted three to four hours. Counsel testified he reviewed Applicant's charges with him and discussed the MAIT report and the findings of his accident reconstruction expert. Counsel testified based on his investigation, Applicant would not have been successful at trial with the defense that the incident was an accident. Counsel testified he was not able to locate any favorable witnesses to testify on Applicant's behalf at trial. Counsel testified it was Applicant's decision to plead guilty and he believed that was in Applicant's best interest. Counsel testified had Applicant wanted to proceed to trial, he would have taken the case to trial.

This Court finds this allegation is without merit, and Applicant has failed to carry his burden of proving that Counsel was deficient in preparing his case for trial. This Court finds Applicant entered his guilty plea freely and voluntarily. This Court also finds Applicant has failed to establish any resulting prejudice from the alleged deficiency. "A guilty plea generally acts as a waiver of all non-jurisdictional defects and defenses." State v. Thomason, 341 S.C. 524, 526, 534 S.E.2d 708, 710 (Ct. App. 2000) (citing State v. Munsch, 287 S.C. 313, 338 S.E.2d 329 (1985)). Additionally, Applicant waived his right to a jury trial, his right to remain silent, and his right to put up a defense to this charge. (GP Tr. 5.) Applicant indicated he understood his constitutional

rights and, understanding those rights, still wanted to enter a guilty plea. (GP Tr. 6.) Applicant further testified Counsel had answered all of his questions, reviewed discovery with him, and had done everything Applicant wanted him to do during his representation. (GP Tr. 4.) Based on Applicant's solemn admission of guilt at the plea, this Court finds Applicant has failed to establish any resulting prejudice from this alleged deficiency. Accordingly, this allegation must be denied and dismissed with prejudice.

CONCLUSION

Based on the foregoing, the Court finds and concludes Applicant has not established any constitutional violations or deprivations that would require this Court to grant his application. Therefore, this application for post-conviction relief must be denied and dismissed with prejudice.

The Court notes Applicant must file and serve a notice of appeal within thirty days from post-conviction relief counsel's receipt of written notice of entry of judgment to secure the appropriate appellate review. See Rule 203, SCACR. Pursuant to Austin v. State, 305 S.C. 453, 409 S.E.2d 395 (1991), Applicant has a right to appellate counsel's assistance in seeking review of the denial of post-conviction relief. Rule 71.1(g), SCRCR, provides that if Applicant wishes to seek appellate review, post-conviction relief counsel must serve and file a notice of appeal on Applicant's behalf. Applicant is directed to South Carolina Appellate Court Rule 243 for appropriate procedures for appeal.

IT IS THEREFORE ORDERED THAT:

1. The application for post-conviction relief is denied and dismissed with prejudice; and
2. Applicant will remain in the custody of the South Carolina Department of Corrections to complete service of his sentence.

AND IT IS SO ORDERED this 17th day of May, 2019.

Kristi Curtis
KRISTI F. CURTIS
Presiding Judge
Eighth Judicial Circuit

Sumter, South Carolina

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Supreme Court of South Carolina
P.O. Box 11330
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