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Jul 27 2020

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Greenville County
The Honorable Alexander S. Macaulay, Circuit Court Judge

THE STATE,

Respondent,

v.

BRADFORD HESTER WILLIAMS,

Appellant.

Appellate Case No. 2017-001753

BRIEF OF RESPONDENT

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STATEMENT OF ISSUE ON APPEAL

Whether the trial judge erred in denying a directed verdict motion based on substantial circumstantial evidence?

STATEMENT OF THE CASE

Appellant was charged with two counts of murder and two counts of possession of a weapon during the commission of a violent crime. (2015-GS-23-2941 & 2018-GS-23-2942). (R. p. 7, lines 4-8). On August 8, 2015, Appellant proceeded to a jury trial before the Honorable Alexander S. Macaulay. Assistant Solicitors Jonathan M. Gregory and L. Mark Moyer prosecuted the case on behalf of the State. Scott D. Robinson represented Appellant at trial. (R. p. 1). At the conclusion of the trial on August 9, 2018, the jury found Appellant guilty on all charges. (R. p. 514, line 24 through p. 515, line 23). Judge Macauley sentenced Appellant to two life sentences for the murder charges, and two 5 year sentences for the weapons charges, to run concurrently. (R. p. 530, line 15 through p. 531, line 17).

Counsel for Appellant served a timely notice of intent to appeal on August 18, 2017. On October 10, 2018, appellate counsel filed a brief pursuant to *Anders v. California*, 386 U.S. 738, 87 S.Ct. 1396 (1967), indicating counsel did not find meritorious grounds for appeal and requested the court relieve her as counsel. As part of the *Anders* brief, counsel raised the singular issue that the trial judge erred in refusing to direct a verdict of acquittal when the State's circumstantial evidence was not substantial and merely raised a suspicion of guilt.

Pursuant to this Order dated February 14, 2020, the South Carolina Court of Appeals denied counsel's motion to be relieved as counsel under *Anders* and directed the parties to brief the following issue:

Whether the trial judge erred in denying a directed verdict motion
based on substantial circumstantial evidence?

Counsel for Appellant filed the Brief of Appellant on March 13, 2020, and Respondent hereby submits its Brief of Respondent.

STATEMENT OF FACTS

The Crime

Quante Jamar Davis (hereinafter “Quante”) is the former friend of Appellant. According to Quante, the fallout with Appellant occurred in the Fall of 2014. Quante testified that the dispute arose when Appellant asked him to hold onto and dispose of a gun for him. Quante did so by selling the gun. However, soon after, Appellant demanded that Quante give him the gun back, but Quante was unable to do so. (R. p. 225, lines 1-18). According to Appellant the dispute arose because Quante broke into his hotel room and stole 32 grams of “hard” and five pounds of marijuana. (State’s Exhibit 53, at 10:59-11:12). Regardless of the reasons, the friendship dissolved. Quante testified that his dispute with Appellant resulted in Appellant frequently riding around looking for him and making threats against him. Quante felt that Appellant was out to get him. This went on for about a month leading up to the time of the shooting. (R. p. 225, line 15 through p. 227, line 1).

The case at hand involves the murder of Quante’s friend, Jamal Justice¹ (hereinafter “Jamal”), and Quante’s cousin, Sylvester Fuller² (hereinafter “Vess”). On November 26, 2014, the night before Thanksgiving, Quante, Vess, and Jamal visited the Bugatti Grand private club. (R. p. 227, lines 2-13). This was Quante’s normal hangout that he would visit three to four times a week. In contrast, Appellant seldom went out clubbing and Quante had never seen Appellant at the Bugatti Club. (R. p. 235, line 17 through p. 236, line 10).

While inside the club on the early morning of Thanksgiving, Quante saw Appellant enter the club. (R. p. 235, lines 8-16). Quante proceeded to point Appellant out to Vess and Jamal. His friends already knew that he had a bad relationship with Appellant, but Jamal had never met

¹ Jamal Justice is often referred to as by his nickname “Wolf” in the record.

² Sylvester Fuller is often referred to by his nickname “Vess” in the record.

Appellant and Vess had only met Appellant recently. (R. p. 229, lines 2-9). Quante then walked outside with Vess and Jamal so that he could explain to them who Appellant was and explain that they needed to be careful. (R. p. 237, line 9 through p. 238, line 2). After having the discussion with the victims, Quante walked around the building to make a phone call to a friend to express his concern about Appellant's presence. (R. p. 238, lines 2-17).

During that time Vess and Jamal confronted Appellant in the parking lot. (State's Exhibit 53, at 8:30-8:58). An argument ensued, and as a result of the argument Appellant drew his .380 caliber pistol and shot at both Victims three times each. (State's Exhibit 53, at 8:58-9:28). Forensics show that Jamal was struck three times, Vess was struck twice, and both individuals died shortly after as a result of their wounds. (R. p. 168, lines 6-7; p. 175, lines 1-8).

Evidence Presented At Trial

Quante identified Appellant and placed him at the club immediately prior to the shooting. (R. p. 235, lines 8-16). During his phone call to a friend concerning Appellant's presence, Quante heard gunshots and immediately ran back around to the front of the club. (R. p. 238, lines 2-17). Quante testified that the amount of time between first hearing the gunshots and seeing Appellant at the murder scene was only ten seconds. (R. p. 265, lines 6-10). He saw both Vess and Jamal were lying on the ground and he saw Appellant in his 2005 light grey Cadillac in reverse gear trying to flee the scene. (R. p. 239, lines 6- 18). Quante testified that he was with Appellant when he purchased the Cadillac and had seen Appellant drive the vehicle many times. (R. p. 240, line 8 through p. 241, line 6). The State also admitted photographs of Appellant with his Cadillac. (R. p. 241, line 18 through p. 242, line 16). Quante ran inside the club to have someone dial 911, but he could not stay at the scene due to his own warrant for arrest. (R. p. 247, lines 10-24; p. 249, lines 19-25). Quante left the scene and walked to Vess's wife's home. He

told her what happened, but as a result of the night's events Quante suffered from a panic attack and had to call an ambulance. He testified that both the police and EMS responded and he told authorities what had happened at the club. However, police were already searching for Quante for a probation violation and he was arrested at that time. (R. p. 249, line 24 through p. 252, line 26).

Witness Jessie Barksdale was in the parking lot at the time of the shooting, she ducked until the shooting ended and then saw a silver Cadillac backing out and leaving from the front of the club. She noted that it seemed like the driver was in a hurry and initially could not get the car in gear. Once the car was in gear, it sped out of the parking lot in front of her. (R. p. 205, lines 1-4). She described the Cadillac as a "big Cadillac", possibly a DTS model, with a "bigger body, a square body." (R. p. 208, lines 4-19). Witness Bobby Snoddy also saw the confrontation between two men standing at the car, and saw a four door Cadillac hurriedly leaving the scene. He believed the car to be tan in color. (R. p. 212, line 8 through p. 218, line 12).

Forensic evidence demonstrated that five separate projectiles were recovered from the bodies of the victims. They were all .380 caliber ammunition. (R. p. 189, lines 12-24). Three of these projectiles were conclusively determined to have been fired from the same firearm. The remaining two projectiles were not inconsistent with being fired from the same firearm as the other three. However, the remaining two projectiles did not have sufficient microscopic marks to allow for conclusive ballistic identification. (R., p. 189, line 12 through p. 190, line 22). One other suspected projectile was also recovered. (R. p. 102, lines 15-20). A total of six .380 shell casings were recovered.³ (R. p. 187, line 21 through p. 188, line 7; p. 324, lines 1-6). The .380

³ A WIN .9 millimeter shell casing and two .40 Smith and Wesson caliber shell casings were found near the roadway entrance to the parking. These were not near the location of victim's bodies and the .380 caliber casings.

shell casings were found clustered together in front of the building. (R. p. 104, lines 12-15).

The state also introduced the recorded interview conducted with Mitchel Sloan. (State's Exhibit 53). Investigator Fortner testified that he was contacted by Lieutenant Hawk who informed him that an inmate named Mitchel Sloan had information he wanted to share regarding the homicide at Club Bugatti. (R. p. 321, lines 6-16). Mr. Sloan testified that he was arrested on a bench warrant, held at Oconee Detention Center, asked to speak with Investigator Fortner to discuss Appellant's actions, and gave an interview to Investigator Fortner on December 8, 2014. (R. p. 275, line 2 through p. 277, line 3). In Mr. Sloan's interview he conveyed substantial information regarding victims' murders, and correctly identified Appellant in a photographic lineup. (R. p. 326, lines 19-24; State's Exhibit 53, at 1:15-3:13).

During his interview Mr. Sloan informed Investigator Fortner that he had known Appellant (aka "Blackloke") for six or seven months.⁴ (State's Exhibit 53, at 0:50-1:00). On the night before Thanksgiving he was up late cleaning chitlins for the holiday meal. (State's Exhibit 53, at 3:15-3:40). He received a phone call from Appellant who said he had an emergency and asked if Mr. Sloan had spoken with his brother, "Big bro". Mr. Sloan asked Appellant what was wrong. Appellant responded that "some shit just went down", but did not want to discuss it over the phone. (State's Exhibit 53, at 4:00-5:20). Mr. Sloan also testified that Appellant was using multiple cell phone numbers to contact him at that time. (State's Exhibit 53, at 15:20-16:45). Mr. Sloan ended his first call with Appellant and received another phone call from a man named Tony Scott, who asked if he had spoken to Appellant to see if Appellant was ok. Tony Scott then mentioned that two people had been shot at the Bugatti and that Appellant and two others had gone out there just before the shooting happened. (State's Exhibit 53, at 5:30-6:30).

⁴ Investigator Chris Hammett was also present during the interview. (R. p. 324, lines 18-20).

Mr. Sloan stated in his interview that Appellant came over to his home on Thanksgiving Day. He and Appellant ate food and smoked a blunt together. (State's Exhibit 53, at 7:10-7:35). During that time Appellant confessed that he was at the club looking for a certain person, but Mr. Sloan could not remember the name that Appellant mentioned. Appellant then explained that the individual he was looking for ended up having some kind of panic attack or medical issue the next day and had to go to the hospital. Appellant told Mr. Sloan that the individual was then arrested while at the hospital. (State's Exhibit 53, at 7:35-8:30; at 10:30-11:00). Appellant informed Mr. Sloan that this individual had previously broken into his hotel room and stolen 32 grams of "hard" and 5 pounds of marijuana. (State's Exhibit 53, at 10:59-11:12).

Appellant continued by explaining to Mr. Sloan that he was in the Bugatti club and drinking when he saw two individuals looking at him "all crazy." He got a bad feeling and decided to leave the club. (State's Exhibit 53, at 8:30-8:45). As he was leaving those two individuals confronted him at his car and said that he better leave "such in such" alone, because if something happens to him, something was going to happen to Appellant. An argument started and one of the other individuals asked a girl to go get his gun. (State's Exhibit 53, at 8:45-8:58). When Appellant heard this he reached out the window and shot both individuals three times each and then sped out of the parking lot. (State's Exhibit 53, at 8:58-9:28; at 16:48-16:52). Appellant informed Mr. Sloan that he used his .380 caliber gun and not his .45 that Mr. Sloan knew Appellant had recently purchased. Mr. Sloan informed Investigator Fortner that Appellant had already disposed of the .380 gun, but did not know where or how Appellant had disposed of it. (State's Exhibit 53, at 12:20-12:51; at 15:00-15:13).

Mr. Sloan stated that Appellant was driving a grey Cadillac at the time, and that he had since gotten rid of the car. Mr. Sloan did not have details regarding how or where Appellant

disposed of the car. He told authorities that after getting rid of the Cadillac, Appellant had switched to driving a green Crown Victoria sedan. Mr. Sloan explained that he knew this because the car belonged to his brother. (State's Exhibit 53, at 9:28-10:20).

Mr. Sloan confirmed that he sought out Investigator Fortner to discuss Appellant, but at the time of trial Mr. Sloan had become an uncooperative witness. (R. p. 274, line 20 through p. 285, line 3). At trial, Mr. Sloan claimed he could not remember the contents of his interview with police. After having the interview played for him outside the presence of the jury in an effort to refresh his memory, Mr. Sloan pivoted to claiming he was pressured. Mr. Sloan then pivoted to claiming that the entire statement was false and based on rumors from the street. (R. p. 276, lines 24-25; R. p. 283, line 6 through p. 284, line 18). The interview was admitted into evidence as State's Exhibit 53 and played for the jury; Mr. Sloan's testimony continued to shift between feeling "pressured" to give a statement, making the statement up, or basing his statement on rumors he claims to have heard on the street. (R. p. 298, line 17 through p. 300, line 8; p. 303, line 4 through p. 307, line 25).

Investigator Fortner testified that his investigation into the murder developed certain information that was purposefully not made known to the public. Mr. Sloan's interview statement contained some of that unreleased information. Mr. Sloan's accurate knowledge regarding the number of shots fired and the caliber of weapon used was of significance to Investigator Fortner's investigation and he signed the warrants against Appellant after concluding the interview with Mr. Sloan. (R. p. 323, line 19 through p. 325, line 12). Investigator Fortner testified that after Mr. Sloan was released they had Mr. Sloan call Appellant in an effort to extract a confession, but were ultimately not successful. (R. p. 325, line 16 through p. 326, line 6).

Additional evidence was presented regarding how Appellant was located and arrested. Appellant was originally believed to be staying at the Savana Suites hotel. (R. p. 319, lines 13-19). Officers learned that Savannah Suites had a room registered under the name Bradford Williams, but that Appellant checked out of that room at 11:00am Thanksgiving morning, November 27, 2014. (R. p. 319, line 25 through p. 320, line 4). This was approximately 9 hours after the Bugatti shooting occurred. Also, Investigator Fortner testified that it was interesting to see that Appellant had checked out of the Savannah Suites hotel room despite having prepaid for the room through December 1, 2014. (R. p. 320, lines 18-19).

Officers obtained the license plate information for the green Crown Victoria they learned Appellant was driving. (R. p. 267, lines 7-12). The car was registered to a Ms. Tiara Washington, and owned by a Lauren Buckco. (R. p. p. 329, lines 2-4). On December 11, 2014, Officer Terrence Lenarde Bowers was patrolling his beat area. He located a vehicle that matched the description of the green Crown Victoria sedan at the local Quality Inn. (R. p. 378, lines 4-8). Upon further investigation, Officer Bowers confirmed that the license plate matched and he called for backup. A perimeter was established around the motel. (R. p. 267, line 2 through p. 268, line 7).

The hotel had a room registered under the name Tiara Washington and officers obtained a search warrant for that room. (R. p. 269, line 3-7; p. 327, line 23 through p. 328, line 2). Tiara Washington was the woman Appellant was dating at the time. (R. p. 382, lines 14-15; p. 242, lines 3-12). Officers found Appellant in the room and arrested him. In the room officers found six different cell phones and a .45 caliber pistol. (R. p. 372, lines 5-22; p. 387, lines 3-13; p. 328, lines 10-12).

ISSUE AS IT WAS PRESENTED AT TRIAL

At the close of the state's case-in-chief Defense Counsel Robinson moved for a directed verdict of acquittal. He argued that the State failed to present any evidence of Defendant's guilt for the crime. Defense Counsel Robinson did not elaborate further. (R. p. 342, line 24 through p. 343, line 8). The State responded by arguing that there was evidence of guilt presented through the testimony of Quante Davis and the statement of Mitchel Sloan. (R. p. 343, lines 12-16). Judge Macaulay articulated that for purposes of directed verdict, the court is not concerned with the weight of the evidence, only whether there is sufficient evidence to proceed. Based upon that standard, Judge Macaulay concluded that there was sufficient evidence to proceed and denied the motion. (R. p. 343, lines 17-20)

STANDARD OF REVIEW

"When ruling on a motion for a directed verdict, the trial judge is concerned with the existence of evidence, not its weight. When this Court reviews the denial of a motion for a directed verdict, it views the evidence in the light most favorable to the non-moving party, and if there is any direct or substantial circumstantial evidence which reasonably tends to prove the guilt of the accused or from which guilt may be fairly and logically deduced, refusal by the trial judge to direct a verdict is not error." *State v. Long*, 325 S.C. 59, 62, 480 S.E.2d 62, 63 (1997).

ARGUMENT

The trial court did not err in denying the directed verdict motion. The State introduced extensive circumstantial evidence of guilt against Appellant, but also admitted direct evidence of guilt against Appellant. In light of the evidence presented, the court did not err in denying the motion for directed verdict and did not err by applying an improper standard of review to the motion.

Pursuant to South Carolina Rule of Evidence 613(b) the court admitted the audio recording of Mitchel Sloan's interview with Investigator Fortner after Mr. Sloan stated he could not remember the interview.⁵ (R. p. 299, line 7 through p. 300, line 8; p. 285-300). The evidence would also have been admissible under Rule 801(d)(2) as a statement by party opponent, which was referenced by the trial court during the parties' discussion of the legal matter outside the presence of the jury. (R. p. 292, lines 2-18; p. 286, lines 11-13). In his interview with Investigator Fortner, Mr. Sloan discussed with law enforcement the explicit and detailed confession that Appellant gave him on November 27, 2014. Specifically, Appellant told him that an argument broke out and that he pulled out his .380 caliber pistol, shot each victim three times, and then fled the scene. Testimony of a prior inconsistent statement is admissible as substantive evidence when the declarant testifies at trial and is subject to cross examination. *State v. Copeland*, 278 S.C. 572, 581, 300 S.E.2d 63, 69 (1982). Mr. Sloan testified at trial and was subject to cross examination. As such, Mr. Sloan's interview was admitted as a State's Exhibit 53 and was available to the jury as evidence of Appellant's guilt.

Moreover, there is no inference needed on the part of the jury in which to derive the evidence of guilt against Appellant. They need only judge the credibility of Mr. Sloan's statements to police.⁶ *State v. Rogers*, 405 S.C. 554, 564, 748 S.E.2d 265, 270 (Ct. App. 2013)

⁵ Mr. Sloan initially began with the statement that he remembered participating in the interview, but could not recall the interview. Over the course of his testimony he dodged, equivocated, and otherwise denied the content of his interview in numerous ways. Ultimately, after the audio was played for the jury and questioning of Mr. Sloan resumed, he conceded that he made the statements, but that such statements were false or based upon rumors on the street. In light of his concession to the interview, the interview would again be substantively admissible, not just admissible for purposes of impeachment.

⁶ The State did not rely solely upon Appellant's confession to Mr. Sloan to prove his guilt for murder. They also have the testimony of Quante Davis and the corroborative forensics. The collective evidence presented by the State more than satisfies *corpus delicti* of the crime of murder. *State v. Osborne*, 335 S.C. 172, 178-81, 516 S.E.2d 201, 204-05 (1999).

(holding “direct evidence is that which requires only the factfinder's determination that the evidence is credible before it may find the existence of a disputed fact. Circumstantial evidence, on the other hand, requires the factfinder not only to determine that it believes the evidence, but also to make at least one additional inference from the evidence before concluding the fact has been proven.”); See also *State v. Gilmore*, 396 S.C. 72, 82, 719 S.E.2d 688, 693 (Ct. App. 2011). In addition to Mr. Sloan’s statements to police giving a direct evidence basis for guilt via Appellant’s confession, the caliber of bullet and the specific number of shots fired is compelling and credible evidence that linked directly to Investigator Fortner’s investigation of the crime scene. Mr. Sloan’s statement to Investigator Fortner was consistent and corroborative to the many other details described in Quante’s testimony, and it made connections to the reason the shooting occurred, the green Crown Victoria sedan, the Cadillac, the .45 caliber pistol, and the multiple cell phones.

In addition to the Appellant’s confession to Mr. Sloan, the State presented substantial circumstantial evidence of guilt in its case-in-chief. Primarily, Quante Davis puts Appellant at the scene of the crime mere seconds after the shooting. Quante saw Appellant and witnessed him flee the scene in his silver Cadillac; Quante was even present with Appellant when he purchased the car. The fact that the Cadillac was fleeing the scene was circumstantial evidence supported by two additional witnesses. The State provided circumstantial evidence in the form of Appellant immediately moving to a new hotel, despite it being Thanksgiving Day, and despite having prepaid for five additional days at the Savannah Suites. This behavior was also important considering Appellant’s Savannah Suites room was registered under his name, and his new hotel room at the Quality Inn was under his girlfriend’s name.

The court did not err in denying the directed verdict on the basis of the lack of substantial

circumstantial evidence. Defense counsel did not raise issue with the court's ruling on the basis of a substantial circumstantial evidence standard, and most importantly, the record contains direct evidence of Appellant's guilt. The court is concerned only with the existence or nonexistence of evidence of guilt, not its weight. *State v. Gaster*, 349 S.C. 545, 555, 54 S.E.2d 87, 92 (2002). The record clearly demonstrates evidence of Appellant's guilt and the court was correct to deny the directed verdict motion.

CONCLUSION

For all of the foregoing reasons, it is respectfully submitted that the judgments, convictions, and sentences of the trial court should be affirmed.

Signature on Following Page

Respectfully submitted,

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BRADFORD HESTER WILLIAMS,

Appellant.

Appellate Case No. 2017-001753

PROOF OF SERVICE

I, Donna D'Alessio, am an employee of the Respondent, hereby certify that as per the March 20, 2020 Order of the Chief Justice, the Brief of Respondent and Proof of Service have been forwarded to Appellant's counsel, Kathrine H. Hudgins, Esq., via email today, July 27, 2020 to KHudgins@sccid.sc.gov, and to her assistant cstock@sccid.sc.gov and by depositing one copy of the same in the United States mail, postage prepaid, and addressed to his attorney of record: Kathrine H. Hudgins, Esq., SCCID/Division of Appellate Defense, 1330 Lady Street, Suite #401, Columbia, South Carolina 29201.

I further certify that all parties required by Rule to be served have been served.

This 27th day of July, 2020.



Donna D'Alessio,
Legal Assistant to W. Joseph Maye
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Subject: Williams, Bradford H. - Appellate Case No. 2017-001753 - Brief of Respondent - 7-27-2020
Attachments: Williams, Bradford Hester - Appellate Case No. 2017-001753 - Brief of Respondent 7-27-2020 (02336263xD2C78).pdf

Dear Ms. Hudgins:

Attached is a scanned copy of the Brief of Respondent, and Proof of Service regarding the above matter. A paper copy is being mailed to you this afternoon. The Brief and supporting documents are being submitted to the South Carolina Court of Appeals through e-filing, along with a copy of this email.

Hope you are well, and thank you.

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