STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Pickens County

Edward W. Miller, Circuit Court Judge

RECEIVED

May 04 2021

S.C. SUPREME COURT

JONATHAN MATTHEW HOLDER,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2021-000057

PETITION FOR WRIT OF CERTIORARI

Joanna K. Delany
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ISSUE PRESENTED

Whether the PCR court erred where it found trial counsel provided effective representation where counsel moved for a mistrial because the solicitor asked Petitioner if he was gay and if he was "interested in young boys," since the Court of Appeals procedurally barred the mistrial issue because counsel did not object the trial court's curative instruction or renew his mistrial motion?

STATEMENT

On May 12, 2015, a Pickens County Grand Jury indicted Jonathan Holder, Petitioner, for second degree criminal sexual conduct with a minor and third degree criminal sexual conduct with a minor. App. 623 – 626.

At the time of his trial, Petitioner was the thirty-three-year-old, married, father of five children. He had no criminal record. App. 224, ll. 5-16; App. 355, ll. 2-8. In 2012, Petitioner worked at the Hampton Psychiatric Residential Treatment Facility (the facility) in Pickens as "direct care staff." The facility was a place for mentally ill children who "are diagnosed with ODD, bipolar, you name it." App. 99, ll. 7-19; App. 141, ll. 3-11; App. 135, ll. 20-24.

A fifteen-year-old resident of the facility, Minor 1, was "dissatisfied" with his progress towards release. App. 75, ll. 18-25; App. 142, ll. 11-14. Minor 1 described living at the facility as being "like lockdown." App. 73, ll. 6-10. According to the Assistant Facility Director, Meghann Harvey, Minor 1 was "a handful." App. 100, ll. 7-11; App. 132, l. 7. Another staff member, Kevin Sowell, said Minor 1 was heard to say "that he knew what to do to get out." App. 142, ll. 6-10. Sowell explained that Minor 1 "would lie and manipulate at times." Sowell agreed that Minor 1 lied about staff persons on occasions and he said Minor 1 had admitted to Sowell "that he had lied about staff." App. 144, ll. 5-24.

In June of 2012, Minor 1 claimed that Petitioner sexually assaulted him at the end of May, in locations that were off-camera. Minor 1 claimed that while he was doing chores, Petitioner touched his genitals in the facility's laundry room and nurse's station, and performed oral sex on him in the library. Minor 1 alleged the library door remained cracked so that Petitioner could look out. According to Minor 1, Petitioner gave him pizza in exchange for letting "him see me play with myself." App. 78, l. 19 – 85, l. 7.

Meghann Harvey claimed that staff persons were told to remain on-camera at all times and she alleged that staying on-camera while with patients had been "an issue" with Petitioner in the past. App. 108, l. 21 – 109, l. 10. Video surveillance footage showed Petitioner and Minor 1 entering the library together on May 31, 2012, and footage also showed Petitioner and Minor 1 going to the laundry room. App. 125, ll. 7-1; App. 103, ll. 10-12; App. 109, l. 14 – 110, l. 13. Trial counsel would later testify that the video footage showed Petitioner step out of the library, "look both ways and then the door would close again." App. 519, ll. 12-15.

Petitioner was tried before the Honorable John C. Hayes, III, and a jury, from May 20 – 21, 2015. David Cantrell, Jr., represented Petitioner and Samuel Tooker represented the State. App. 1.

Petitioner testified that he had not touched Minor 1 and said he had done nothing "inappropriate" with Minor 1. App. 240, ll. 14-21; App. 257, ll. 10-20. Petitioner explained that his wife got him pizza and he shared it with other employees. Petitioner agreed he gave pizza to Minor 1 when Minor 1 asked for some. App. 246, l. 2 – 247, l. 20. Petitioner said he tried to stay on-camera while working at the facility, but he explained it was impossible to do so at all times. App. 231, l. 20 – 232, l. 19.

When his time came to cross-examine Petitioner, the solicitor improperly appealed to the prejudices of the jury by exploiting bias against homosexuals. The following exchange occurred:

BY MR. TOOKER:

Q. **So are you gay?**

A. **No.**

Q. **Are you interested in young boys?**

A. **No.**

MR. CANTRELL: Your Honor, again, I object.

THE COURT: I sustain the objection.

MR. CANTRELL: There's no foundation.

THE COURT: I sustain the objection.

App. 296, l. 22 – 297, l. 5 (emphasis added).

Trial counsel immediately moved for a mistrial. He argued the questioning was "prejudicial," "irrelevant" and "without foundation."

> [W]e don't know the predisposition of members of the jury. If there is no foundation for such a statement or allegation, we don't know the effect it could have. It was unnecessary. I believe its grounds for a mistrial. I'm not satisfied that Mr. Holder can get a fair trial . . . it would be prejudicial.

App. 297, l. 20 – 298, l. 18. "[W]hy ask that. It just serves to bring up issues that should not be brought up. There is no foundation for it. I think it can be prejudicial, and I don't think it can be undone at this stage." App. 298, l. 24 – 299, l. 5.

The solicitor responded,

> Mr. Cantrell elicited from the defendant that he's married, that he does have several children. He's expecting another child. Candidly, and this is just my personal theory in the case, but it seems to me like these things happen by virtue of some sort of repression.

App. 299, ll. 7-12.

THE COURT: Some sort of what?

MR. TOOKER: Repression. Repressed—if these things are true—and I'm not—

THE COURT: Well, you're not a psychiatrist or a psychologist.

MR. TOOKER: No, I'm not.

THE COURT: And have you had your theory [vetted] by someone who has expertise to tell you whether you are going down the right rabbit trail or not?

MR. TOOKER: Absolutely not, sir . . .

App. 299, ll. 13-22.

The court noted that the case must be "based on fact," and ruled:

> Well, I think—I think it was an inappropriate question, quite candidly, because there is nothing without foundation to throw that in. It is—it is just inappropriate. I'm not going to go any further than that. However, I do not feel that it manifests a necessity to grant a mistrial. I'm going to ask the jury to disregard that. If we – if we have another episode like that, then we will bring this two and a half day—or two day trial to a screeching halt. And I think I have said enough on that, too.
> . . .
>
> I will give, even though the defense has not requested it, I want the record to be clear that I'm doing this *sua sponte*, to give the correct—curative instructions and we'll proceed.

App. 300, l. 22 – 301, l. 14.

The court then instructed the jury,

> Members of the jury panel, shortly before you went out, the—Mr. Tooker asked the witness whether or not he was gay. That was not an appropriate question. There is no evidence in this record to support that question. The question is not relevant—the question nor the answer.
>
> So please disregard the fact that the question was asked. Mr. Holder answered it no, so you can disregard that, too. But just disregard—that's not an issue in this case to any degree whatsoever. So disregard the fact that that question was asked. You may proceed.

App. 301, l. 20 – 302, l. 6.

The solicitor returned to his "personal theory" that homosexuality was equated with pedophilia in his closing argument, when he claimed Minor 1 was credible since he admitted he ejaculated. The solicitor suggested that if Minor 1 had been lying, he would have spun the story to show that he was not gay. "If you're making this up, and you're a guy . . . You're going to say,

yeah, he tried to do these things to me. I was like, whoa, Bro, I'm not into that. That's not what I'm about." App. 332, l. 20 – 333, l. 5.

When the jury returned verdicts of guilt, the trial court expressed surprise, asking the clerk who read the verdict, "Are you sure that's what it says?"[1] App. 352, ll. 12-15. Petitioner was convicted as indicted and he was sentenced to concurrent ten year terms of imprisonment, with lifetime sex offender registry. App. 627 – 628; App. 358, ll. 21-25; App. 352, ll. 11-19.

On direct appeal, Petitioner argued, "The trial court erred in refusing to declare a mistrial after the solicitor asked, as the trial court called it, the 'inappropriate question' that was 'without foundation' of whether appellant was gay and 'interested in young boys' in a sexual abuse case." App. 361 – 380. However, the Court of Appeals affirmed Petitioner's convictions, finding the alleged error was unpreserved, since trial counsel did not object to the curative instruction or renew his mistrial motion:

> Affirmed pursuant to Rule 220(b), SCACR, and the following authorities: *State v. Rogers*, 361 S.C. 178, 183, 603 S.E.2d 910, 912–13 (Ct. App. 2004) (holding for an issue to be preserved for appellate review, it must be "(1) raised to and ruled upon by the trial court, (2) raised by the appellant, (3) raised in a timely manner, and (4) raised to the trial court with sufficient specificity" (quoting Jean Hoefer Toal et al., Appellate Practice in South Carolina 57 (2d ed. 2002))); *State v. George*, 323 S.C. 496, 510, 476 S.E.2d 903, 911–12 (1996) ("If the trial [court] sustains a timely objection to testimony and gives the jury a curative instruction to disregard the testimony, the error is deemed to be cured."); *id.* ("No issue is preserved for appellate review if the objecting party accepts the [trial court's] ruling and does not contemporaneously make an additional objection to the sufficiency of the curative charge or move for a mistrial."); *State v. Walker*, 366 S.C. 643, 658, 623 S.E.2d 122, 130 (Ct. App. 2005) ("A curative instruction to disregard incompetent evidence and not to

[1] A second judge, the PCR judge, would later observe that, "this was generally a weak case" against Petitioner. App. 587.

> consider it during deliberation is deemed to have cured any alleged error in its admission.").

State v. Holder, Op. No. 2017-UP-239 (S.C. Ct. App. filed June 7, 2017).

On May 15, 2018, Petitioner filed an application for post-conviction relief (PCR). App. 405 – 421. The State made its return September 7, 2018. App. 422 – 429. On October 25, 2019, a hearing was held on the matter before the Honorable Edward W. Miller. Mills Ariail, Jr., represented Petitioner. Taylor Smith represented the State. App. 430.

At the hearing, Petitioner provided the facts surrounding the mistrial motion and explained that the Court of Appeals found trial counsel's mistrial motion to be unpreserved. App. 455, l. 10 – 458, l. 23. Petitioner said there had been a noticeable reaction in the courtroom to the solicitor's "really shocking" questions and that "a couple of people kind of yelled out, my wife being one of them, you know." App. 478, l. 24 – 479, l. 3. "And [trial counsel] even was floored, the whole court, people were like, ah, you know, gasping that [the solicitor] said something this outlandish." App. 454, ll. 9-16. Petitioner said trial counsel subsequently told him the solicitor made "a fool out of himself" with the questions. App. 454, l. 17 – 455, l. 2.

David Alexander, who represented Petitioner on direct appeal, said that he briefed the mistrial issue because he thought it was a "winnable" issue. App. 483, ll. 11-19. "I thought the merits of it were strong." App. 484, ll. 1-2. Appellate counsel thought the merits of the issue were strong enough to "get past" any possible preservation problem. App. 483, ll. 16-17. Appellate counsel explained that there was no "valid reason" for the solicitor's questions about whether Petitioner was gay and liked young boys. App. 484, l. 23 – 485, l. 6.

Trial counsel told the PCR court that he moved for a mistrial because he thought the solicitor's questions were "egregious." However, trial counsel said he did not object to the sufficiency of the court's curative instruction because he believed it was an "appropriate curative

instruction." App. 506, ll. 8-22. "I just believed that was going to be the best that we were getting." App. 509, ll. 9-10.

The PCR court ruled that Petitioner *was* entitled to post-conviction relief based on trial counsel's failure to preserve his mistrial motion, as well as his failure to object to the jury instruction that a victim's testimony need not be corroborated in a criminal sexual conduct case. App. 529, ll. 13-24.

On July 16, 2020, the PCR court issued an order granting PCR.[2] App. 532 – 553. The court found, *inter alia*, "Trial counsel was constitutionally ineffective for failing to preserve for appellate review his objection to the State's questions about [Petitioner's] sexuality and his motion for a mistrial." App. 550. "Appellate counsel argued on appeal that Judge Hayes erred in denying trial counsel's motion, and the Court of Appeals affirmed, finding this issue had not been preserved for appellate review." App. 550. "The solicitor's comments, when considered in their totality, show that [Petitioner] was prejudiced by the exchange and that the result of the trial would have been different had trial counsel preserved the issue for appellate review." App. 551. "This Court finds [Petitioner] has demonstrated that trial counsel was constitutionally ineffective for failing to preserve the issue for direct appellate review and that [petitioner] is entitled to post-conviction relief."[3] App. 551.

On July 23, 2020, the State filed a motion to alter or amend the judgment in which it argued, *inter alia*, that the trial court's curative instruction prevented any prejudice to Petitioner. App. 554 – 565. On November 23, 2020, Petitioner filed his response to the State's motion. App.

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[2] The order was mistakenly titled, "Order of Dismissal." App. 532.

[3] The order further concluded that, "Trial counsel was constitutionally ineffective for failing to object when Judge Hayes improperly instructed the jury that the victim's testimony did not need to be corroborated." App. 547.

566 – 574. Petitioner argued the "fact that trial counsel believed the question prejudicial enough to [Petitioner] to move for a mistrial but failed to reserve such a major issue for appellate review" supported granting PCR. App. 573.

The parties reconvened for a hearing on the matter, via WebEx, on November 30, 2020. App. 575. The State argued the trial court's curative instruction was "[p]retty thorough," and that if the issue had been preserved, the case would not have been reversed on appeal. App. 585, ll. 5-17. PCR counsel countered that the improper questions prejudiced Petitioner. App. 590, ll. 2-5. The court took the matter under advisement and both parties submitted post-hearing briefs. App. 592, ll. 10-11; App. 595 – 601; App. 602 – 607.

On January 5, 2021, the court issued an order granting the State's motion to alter or amend the judgment. App. 608 – 622. The order stated Petitioner "is not entitled to post-conviction relief with respect to [Petitioner's] claim that trial counsel was constitutionally ineffective for not preserving for appellate review trial counsel's objection to and motion for a mistrial over the assistant solicitor's asking [Petitioner] on cross-examination whether [Petitioner] was gay and liked young boys." App. 614.

The order continued, "[Petitioner] has failed to prove that there is a reasonable likelihood that his convictions would have been reversed on appeal even if trial counsel had objected to the trial court's curative instruction on the basis that the instruction was inadequate to cure the prejudicial effect of the assistant solicitor's questions, thus preserving the issue for appellate review." App. 616. "The trial court's curative instruction cured any error or potential prejudice from the assistant solicitor's two, brief, successive questions . . . [Petitioner] has failed to show that the trial court abused its discretion in denying trial counsel's motion for a mistrial and that the appellate courts would have reversed had they reviewed the issue." App. 617. "Notably,

[Petitioner] believed the assistant solicitor's questions would have turned those in the courtroom against the State, not against [Petitioner] himself, because everyone recognized the questions were inappropriate." App. 617, n. 3.

The order also excused trial counsel's failure to object to the curative instruction: "It would have been merely an exercise in futility for trial counsel to press the issue, and such exercises are not required by the Sixth Amendment's guarantee of the effective assistance of counsel."[4] App. 617.

This petition for writ of certiorari follows.

[4] The order further concluded that Petitioner "is not entitled to post-conviction relief with respect to his claim that trial counsel was constitutionally ineffective for not objecting to the jury instruction that the victim's testimony did not need to be corroborated." App. 610. (*State v. Stukes*, 416 S.C. 493, 787 S.E.2d 480 (2016), was decided after Petitioner's 2015 trial took place). Finally, the order stated the court found that the "theory of cumulative error" was inapplicable here, in part because it found no error. App. 618 – 621.

ARGUMENT

The PCR court erred where it found trial counsel provided effective representation where counsel moved for a mistrial because the solicitor asked Petitioner if he was gay and if he was "interested in young boys," since the Court of Appeals procedurally barred the mistrial issue because counsel did not object the trial court's curative instruction or renew his mistrial motion.

The solicitor's questions were an irrelevant and improper appeal to the prejudices of the jury. They were not corrected by the court's curative instruction, particularly given that the instruction only addressed one of the two questions and given that this was a child sexual abuse case. Trial counsel was constitutionally ineffective when he failed to renew his mistrial motion or object to the sufficiency of the curative instruction.

Homosexual people have long been vilified, by the law and in society. *See Obergefell v. Hodges*, 576 U.S. 644, 660–61, (2015) (explaining that historically, the argument that "gays and lesbians had a just claim to dignity was in conflict with both law and widespread social conventions.") *Id*. In the 1980's, Chief Justice Burger wrote that, "Condemnation of [homosexual] practices is firmly rooted in Judeao-Christian moral and ethical standards." *Bowers v. Hardwick*, 478 U.S. 186, 196 (1986) (Burger, C.J., concurring), *overruled by Lawrence v. Texas*, 539 U.S. 558 (2003). In *Lawrence v. Texas*, 539 U.S. at 571, the Supreme Court explained that

> for centuries there have been powerful voices to condemn homosexual conduct as immoral. The condemnation has been shaped by religious beliefs, conceptions of right and acceptable behavior, and respect for the traditional family. For many persons these are not trivial concerns but profound and deep convictions accepted as ethical and moral principles to which they aspire and which thus determine the course of their lives.

"[D]ata suggest that compared to straight defendants, defendants perceived to be gay face unfair presumptions of guilt in child sexual abuse cases." Tisha R. A. Wiley, Bette L. Bottoms, *Effects of Defendant Sexual Orientation on Jurors' Perceptions of Child Sexual Assault*, 33 Law & Hum. Behav. 46, 55 (2009). "Surveys reveal that people presume a link between homosexuality and pedophilia." *Id*. at 47. "One stereotype about gay men generally is that they are oversexed, predatory child molesters who are drawn to boys in particular." *Id*. at 46.

However, evidence of homosexuality is not relevant to prove criminal sexual conduct with a minor. "[E]vidence of a man's homosexuality is irrelevant to whether he has a sexual interest in children." *Com. v. Christie*, 53 N.E.3d 1268, 1271 (Mass. App. Ct. 2016). "The belief that homosexuals are attracted to prepubescent children is a baseless stereotype." *State v. Bates*, 507 N.W.2d 847, 852 (Minn. Ct. App. 1993). *See also People v. Garcia*, 177 Cal. Rptr. 3d 231, 242 (Cal. App. 4th 2014) (in prosecution for sexual abuse of a child, evidence of defendant's homosexual orientation was irrelevant and potentially inflammatory).

Here, the solicitor attempted to exploit bias against homosexual persons with his improper questions. As seen, the solicitor told the trial judge it was his opinion that a person who molested a child did so because he was a "repressed" homosexual. Although counsel moved for a mistrial, the court denied the motion and gave the jury a curative instruction. Counsel did not object to the insufficiency of the curative instruction or renew his mistrial motion. However, the trial court's curative instruction did not correct the improper, inflammatory nature of the solicitor's questions, since the instruction did not get at the purported causal connection between homosexuality and child sexual abuse. The court instructed only that the jury disregard the first question and answer, of whether Petitioner was gay. It did not instruct the jury to disregard the

second question and answer, of whether Petitioner was interested in young boys. App. 301, l. 20 – 302, l. 6. As Petitioner observed, there was a noticeable reaction, even gasping heard in the courtroom when the improper questions were asked, a fact which exemplifies the magnitude of prejudice to Petitioner.

"[W]hether to grant or deny a mistrial is within the discretion of the trial court and will not be reversed on appeal absent an abuse of discretion." *State v. Herring*, 387 S.C. 201, 216, 692 S.E.2d 490, 498 (2009). "The grant of a motion for a mistrial is an extreme measure which should be taken only where an incident is so grievous that the prejudicial effect can be removed in no other way." *Id*. "Generally, a curative instruction to disregard the testimony is deemed to have cured any alleged error." *Id*.

"[A]n instruction to disregard objectionable evidence usually is deemed to have cured the error in its admission unless on the facts of the particular case it is probable that notwithstanding such instruction the accused was prejudiced." *State v. Hale*, 284 S.C. 348, 354, 326 S.E.2d 418, 422 (Ct. App. 1985). "Because a trial court's curative instruction is considered to cure any error regarding improper testimony, a party must contemporaneously object to a curative instruction as insufficient *or* move for a mistrial to preserve an issue for review." *State v. Walker*, 366 S.C. 643, 658, 623 S.E.2d 122, 130 (Ct. App. 2005) (emphasis in original). "Generally, the consideration of whether there was any prejudice requires that a motion for mistrial be made after the trial judge attempts to cure the error." *State v. Craig*, 267 S.C. 262, 268, 227 S.E.2d 306, 309 (1976). As seen, the issue of whether Petitioner was entitled to a mistrial was raised on direct appeal but the Court of Appeals found counsel did not preserve the issue.

Where trial counsel fails to preserve an issue for direct appeal, that issue may properly be raised as a post-conviction relief allegation of ineffective assistance of counsel. *McLaughlin v.*

State, 352 S.C. 476, 483, 575 S.E.2d 841, 844 (2003) ("Because this issue was found to be unpreserved on direct appeal, respondent may raise this issue in his PCR proceeding."). *See also Foye v. State*, 335 S.C. 586, 590, 518 S.E.2d 265, 267 (1999) ("counsel was deficient because he failed to adequately preserve this issue for review."); *McHam v. State*, 404 S.C. 465, 475, 746 S.E.2d 41, 47 (2013), *abrogated on other grounds by Smalls v. State*, 422 S.C. 174, 810 S.E.2d 836 (2018) ("This Court has previously held that an issue that was raised on direct appeal but found to be unpreserved may be raised in the context of a PCR claim alleging ineffective assistance of counsel.")

People in the courtroom noticeably reacted and gasped when the questions were asked. Counsel thought the questions were so improper that a mistrial was required. However, the Court of Appeals found the issue procedurally barred since counsel did not object to the adequacy of the curative instruction or renew his mistrial motion. This was ineffective assistance of counsel.

Whether the prosecution intentionally elicits inadmissible evidence is a factor the court considers in determining whether to grant a mistrial. *State v. Ferguson*, 376 S.C. 615, 619, 658 S.E.2d 101, 103 (Ct. App. 2008). Here, the solicitor intentionally posed the improper questions. The questions were, as the trial court correctly recognized, without foundation and irrelevant. However, the questions did appeal to a well-known prejudice, one common enough it was even shared by the solicitor—that gay men are child molesters. Juror prejudice is already problematic in child sexual abuse cases, even absent the additional prejudice baselessly injected by the solicitor here. The effect of these improper questions was not undone by the court's curative instruction.

The Sixth Amendment to the United States Constitution guarantees an accused the right to effective assistance of counsel. U.S. CONST. amend. VI; *Strickland v. Washington*, 466 U.S.

668 (1984). The United States Supreme Court has established a two-pronged test to evaluate allegations of ineffective assistance of counsel. A petitioner must prove "that counsel's performance was deficient" and fell below reasonable professional norms, and the deficient performance prejudiced the petitioner. *Id.* at 687.

To demonstrate prejudice, a PCR applicant "must show that there is a reasonable probability that, but for counsel's unprofessional errors, the result of the proceeding would have been different. A reasonable probability is a probability sufficient to undermine confidence in the outcome." *Strickland*, 466 U.S. at 694. Specifically, "[t]o prove prejudice resulting from counsel's failure to move for a mistrial, an applicant must demonstrate that, had counsel moved for a mistrial, the trial court's denial of the motion would have amounted to an abuse of discretion." *Earley v. State*, 418 S.C. 255, 266, 792 S.E.2d 226, 232 (2016).

Although the court instructed the jury to disregard the question of whether Petitioner was gay, the instruction was insufficient to fully mitigate the solicitor's linking of homosexuality with pedophilia in this child sexual abuse case. Petitioner established prejudice here—the result of the proceeding would have been different had counsel renewed his mistrial motion, because on these facts, the court's refusal to grant the mistrial motion would have been an abuse of discretion. *Strickland*, 466 U.S. at 694.

CONCLUSION

Based on the foregoing argument, Petitioner respectfully requests that a writ of certiorari be granted to allow full briefing on this issue.

s/ *Joanna K. Delany*
Joanna K. Delany
Appellate Defender

ATTORNEY FOR PETITIONER

This 4th day of May, 2021.

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May 04 2021

S.C. SUPREME COURT

CERTIFICATE OF COUNSEL

The undersigned certifies that to the best of her ability this Petition for Writ of Certiorari complies with Rule 211(b), SCACR, and the April 15, 2014 order from the South Carolina Supreme Court entitled "Revised Order Concerning Personal Identifying Information and Other Sensitive Information in Appellate Court Filings."

s/ *Joanna K. Delany*
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This 4th day of May, 2021.