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**May 14 2021**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
The Honorable Robin B. Stilwell, Trial Judge  
The Honorable Frank R. Addy, PCR Judge

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Appellate Case No. 2018-001120

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LEVITICUS D. YOUNG,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

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**BRIEF OF RESPONDENT  
PURSUANT TO WHITE V. STATE**

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## **ISSUES PRESENTED**

The trial judge properly allowed admission of a surveillance video showing Appellant and his codefendant entering and exiting the scene of the assault and armed robbery for which he was charged.

## STATEMENT OF THE CASE

In March of 2015, the Greenville County Grand jury indicted Appellant<sup>1</sup> for first-degree assault and battery, armed robbery, and possession of a weapon during the commission of a violent crime. On January 11, 2017, Appellant proceeded to a jury trial before the Honorable Robin B. Stilwell on the assault and battery and armed robbery charges. Assistant Solicitor Mark Moyer, Esquire, represented the State; Lauren Taylor, Esquire, represented Appellant. The jury found Appellant guilty as charged, and he was sentenced to concurrent terms eighteen years' incarceration for armed robbery and ten years' incarceration for first-degree assault and battery. On January 26, 2017, Appellant filed a pro se notice of intent to appeal. The South Carolina Court of Appeals sent a deficiency letter to counsel on February 8, 2017, and dismissed the appeal on May 5, 2017, for the defense's failure to properly serve the notice.

On August 7, 2017, Appellant filed an application for post-conviction relief (PCR). The State filed a return on March 9, 2018. On April 19, 2018, an evidentiary hearing was held before the Honorable Frank Addy. Assistant Attorney General Kelly Oppenheimer, Esquire, represented the State; R. Mills Ariail, Esquire, represented Appellant. On June 6, 2018, Judge Addy filed a written order denying relief and dismissing the application. A timely notice of intent to appeal was served and a petition for a writ of certiorari was filed on January 25, 2019. On May 22, 2019, the Supreme Court of South Carolina transferred the case to the Court of Appeals pursuant to Rule 243(l), SCACR. On February 17, 2021, this Court granted a belated appeal and requested briefs. Appellant filed his brief pursuant to White v. State, 263 S.C. 110,

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<sup>1</sup> Because briefing in this matter is pursuant to White v. State and no other matters remain in the petition for a writ of certiorari, the State will refer to Petitioner as "Appellant" throughout this brief.

208 S.E.2d 35 (1974) and Davis v. State, 288 S.C. 290, 342 S.E.2d 60 (1986) on April 14, 2021.

This brief of respondent follows.

### **Trial Evidence**

Victim testified he was working alone at Poinsett Tire on June 6, 2014, when two men pulled up to the shop around 6:00 p.m. and acted as if they were interested in buying cars. At that point, the codefendant Steven Williams demanded money while Appellant held a stun gun. The two men pushed Victim towards the back of the store, at which point Williams aimed a revolver at Victim's head and said, "Give me the fucking money." Fearful, Victim took \$150.00 from his front pocket and threw it up into the air. Williams began picking up the money, but Appellant pushed Victim and began hitting him. Williams joined the skirmish and hit Victim in the head with the revolver. Appellant also tasered Victim. Williams ran to the car first. As Appellant tried to leave, Victim was able to pick up a piece of metal and hit him. Appellant eventually made it to the vehicle, at which point the two men fled from the scene. Due to the attack, Victim was unsure of where his cell phone had ended up. Determined to not let the men escape with the money, he jumped into his own vehicle and began pursuit. (App.p.174, line 16–App.p.189, line 24)

Victim was able to catch up to the black Mercedes and at one point stopped to ask a woman he recognized for help before restarting his pursuit. The men realized they were being followed and began driving much faster. Victim also accelerated and was able to ram the back of the Mercedes. At this point Appellant, now holding a gun, fired a shot which Victim was able to avoid by swerving. Williams attempted to accelerate even more and get away, but lost control of the vehicle and hit a telephone pole. Victim stopped and watched Appellant exit the vehicle and attempt to quickly escape the scene while Williams remained in the vehicle. Confused as to

what his next act should be, Victim decided to drive to a nearby shopping center to find a phone with which he could contact law enforcement. Victim found a friend and convinced him to contact police. Victim noticed that at that point police had arrived and were in the street, so he went over to them and informed them about the assault and robbery. (App.p.189, line 25–App.p.198, line 21)

As officers were taking him back to Poinsett Tire, Victim saw Williams and identified him to police. (App.p.198, line 22–App.p.199, line 8)

Darwin Shaw, a forensics officer with Greenville County's Department of Public Safety inspected the various crime scenes. He inspected Victim's vehicle and found evidence that it had impacted another vehicle, along with finding some blood within the vehicle. At Poinsett Tire, he found a stun gun and observed loose cash around the scene, including bills on top of a shelf and behind a fan. Shaw also met up with Victim at this location and photographed his various injuries, including various marks, abrasions, and blood over his head, back, and sides. When Shaw was able to inspect the Mercedes, he confirmed that it had impacted a utility pole. (App.p.64, line 17–App.p.88, line 11)

Mac McBryde, an employee of a mulch yard located on the same property as Poinsett Tire, confirmed that his business had several security cameras which recorded events on the property, with two of the cameras pointed at Poinsett Tire. He confirmed the video recording possessed by the State was recorded by his cameras and that he provided the footage to officers during their investigation. (App.p.94, line 20–App.p.103, line 12)

Robert Cullum was grilling in his backyard on the day in question when, at approximately 6:15, he heard gunshots. He looked up and saw a Mustang chasing a Mercedes and saw the two vehicles collide before the latter ran into a telephone pole. After telling his

family to call the police, he ran to the Mercedes to see if its occupants were in need of medical attention. He saw a man exit the passenger side of the vehicle and take off running from the scene. The passenger ran past him and refused to stop despite Cullum's repeated requests to do so. Cullum identified Appellant as that man. (App.p.104, line 20–App.p.114, line 25)

After making his way to the Mercedes, Cullum helped the driver exit the vehicle. The driver was disoriented, so Cullum tried to keep him calm and advise him that paramedics were on the way to the scene. Cullum identified the driver as Williams. (App.p.115, line 1–App.p.116, line 19)

Karen Brown, Cullum's mother, also heard the commotion and followed behind him to the crashed Mercedes. She also observed a man flee from the vehicle. She identified Appellant as that man. When she looked into the Mercedes, she saw a gun sitting on the front seat. She also saw Cullum helping the driver of the vehicle, a man she identified as Williams. (App.p.129, line 18–App.p.137, line 8)

Stephanie Bishop was outside on June 6, 2014, when she saw two cars barreling down her road. The first one, a black Mercedes, sped past, but the second one, a Mustang, stopped and its driver asked her to call 9-1-1. She identified that driver as Victim. The Mustang sped off, and Bishop called 9-1-1. (App.p.143, line 16–App.p.153, line 7)

Deputy Mark Husk of the Greenville County Sheriff's Office was responding to a civil matter unrelated to Appellant's case when Victim approached him. Deputy Husk immediately observed that Victim was excited, upset, and had blood on his face and neck. Once he was able to calm Victim down, he was able to understand Victim had been robbed at his tire shop and that he had chased the perpetrators. Deputy Husk transported Victim to the location of the accident, where he identified the Mercedes as the vehicle he had chased and Williams as one of the men

who robbed him. Williams was speaking with officers at that time, so Deputy Husk transported Victim to Poinsett Tire. Deputy Husk confirmed the stun gun and scattered money were at the location when he arrived. (App.p.156, line 1–App.p.163, line 10)

Deputy Chris McAlmont of the Greenville County Sheriff's Office was the first officer to arrive at the scene of the Mercedes crash. He found Williams at the scene sitting in the driver's feet, but with his feet resting outside the vehicle. Deputy McAlmont was also aware of the reported robbery at this time, and separated Williams from the car. After having another deputy handcuff Williams, Deputy McAlmont peered into the car and saw a revolver sitting in plain sight. (App.p.220, line 20–App.p.234, line 2)

Dana Lewis, an employee of the Greenville County Detention Center, was at the facility when Williams was brought to the facility later that day. \$130.79 in cash was found on Williams despite the fact that no wallet was in his possession. (App.p.251, line 17–App.p.258, line 16)

#### **Admission of the Surveillance Video**

Prior to trial, counsel for Appellant moved to exclude a video surveillance recording taken from outside Poinsett Tire, the location where Appellant assaulted and robbed Juan Cabrera (Victim). The recording showed two men arrive outside the business in a black Mercedes, exit the vehicle, and go inside the business. Later, the men are seen running out of the business, chased by Victim. Trial counsel objected to the recording, claiming that Appellant and his codefendant could not be identified in the recording and that it did not show the armed robbery or assault and battery at issue; counsel claimed these facts demonstrated admission of the video was more prejudicial than probative. The State countered by arguing the men fleeing from the business chased by Victim was probative because it corroborated Victim's description of events, which was the basis for Appellant's charges. The trial judge determined he would not

exclude the evidence at that point in time, noting that based on the parties' descriptions of the recording "it [wa]sn't prejudicial at all." The trial judge emphasized that his decision was not a final ruling and trial counsel could renew his objection once the State sought to introduce the video. (App.p.5, line 7–App.8, line 11)

During the trial, the State moved to admit the recording through Victim, who explained the video was recorded by surveillance cameras from the business next door to Poinsett Tire, and that he was seen waving his hands in the recording because he was trying to get help. Appellant renewed his pre-trial objection, which was overruled by the trial judge. Following this, Victim explained some of the other events in the video, such as it showing him getting into his own vehicle and chasing after the men. (App.p.190, line 15–App.p.193, line 1)

Appellant did not present any evidence at trial. The defense's strategy was to argue no robbery took place, but that Appellant and Williams attacked Victim because the group of men had an altercation a week or two before the incident. (App.p.52, line 17–App.p.53, line 11; App.p.301, lines 13–24)

## STANDARD OF REVIEW

In criminal cases, the appellate court sits to review errors of law only. State v. Wilson, 345 S.C. 1, 5, 545 S.E.2d 827, 829 (2001). Appellate courts are bound by the trial court's factual findings unless they are clearly erroneous. State v. Quattlebaum, 338 S.C. 441, 453, 527 S.E.2d 105, 111 (2000). In reviewing findings on admissibility of evidence, appellate courts are limited to determining whether the trial judge abused his or her discretion, and whether that abuse of discretion has prejudiced the defendant. State v. Scott, 405 S.C. 489, 497, 748 S.E.2d 236, 241 (Ct. App. 2013) ("appellate courts recognize that the trial judge has considerable latitude [in the admissibility of evidence] and will not disturb such rulings absent a prejudicial abuse of discretion"). In criminal cases, appellate courts do not reevaluate the facts based on their view of the evidence, but merely determine whether the trial judge's ruling is supported by any evidence. Wilson, at 6, 545 S.E.2d at 829; State v. Mattison, 352 S.C. 577, 575 S.E.2d 852 (Ct. App. 2003). "If there is any evidence to support the admission of the bad act evidence, the trial judge's ruling will not be disturbed on appeal." State v. Mathis, 359 S.C. 450, 462, 597 S.E.2d 872, 878 (Ct. App. 2004) *citing* State v. Wilson, 345 S.C. 1, 545 S.E.2d 827 (2001).

"The admission of evidence is within the discretion of the trial court and will not be reversed absent an abuse of discretion." State v. Taylor, 396 S.C. 193, 720 S.E.2d 522 (Ct. App. 2011); State v. Kirton, 381 S.C. 7, 23, 671 S.E.2d 107, 114 (Ct. App. 2008). Abuse occurs when the determination of the trial court lacks factual support or is controlled by an error of law. Id. Evidence is deemed relevant and admissible if "it logically or reasonably tends to prove or disprove a crime charged or any fact material to the issue." State v. Tillman, 304 S.C. 512, 405 S.E.2d 607, 611 (1991). Evidence which is logically relevant to a material element of the offense will not be excluded because it may also show guilt of another crime. Id. If the proffered

evidence is determined to be relevant pursuant to Rule 401, SCRE, then the trial court must then consider whether the bad act evidence falls within an exception of Rule 404(b), SCRE. State v. Wallace, 384 S.C. 428, 433, 683 S.E.2d 275, 277 (2009).

## ARGUMENT

**The trial judge properly allowed admission of a surveillance video showing Appellant and his codefendant entering and exiting the scene of the assault and armed robbery for which he was charged.**

Appellant argues the trial judge erred in allowing the State to introduce the surveillance recording showing Appellant and his codefendant entering and exiting Poinsett Tire. The State disagrees with this allegation of error. The video was relevant to the State's case because it corroborated the Victim's testimony about the events surrounding the assault and robbery. Further, the evidence was not unfairly prejudicial to Appellant because it did not suggest his guilt on any improper basis. Finally, even if the trial judge erred in admitting the video, any alleged error was harmless given the remainder of the evidence of the State which demonstrated Appellant's guilt.

Pursuant to Rule 401, SCRE: "'Relevant evidence' means evidence having any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence." Additionally: "All relevant evidence is admissible, except as otherwise provided by the Constitution of the United States, the Constitution of the State of South Carolina, statutes, these rules, or by other rules promulgated by the Supreme Court of South Carolina. Evidence which is not relevant is not admissible." Rule 402, SCRE. "Although relevant, evidence may be excluded if its probative value is **substantially** outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury, or by considerations of undue delay, waste of time, or needless presentation of cumulative evidence." Rule 403, SCRE (emphasis added).

"Probative" means "[t]ending to prove or disprove." Black's Law Dictionary 1323 (9th ed. 2009). "Probative value" is the measure of the importance of that tendency to the outcome of

a case. State v. Gray, 408 S.C. 601, 609–10, 759 S.E.2d 160, 165 (Ct. App. 2014). “It is the weight that a piece of relevant evidence will carry in helping the trier of fact decide the issues.” Id. at 610, 759 S.E.2d at 165. “[T]he more essential the evidence, the greater its probative value.” Id. (quoting United States v. Stout, 509 F.3d 796, 804 (6th Cir.2007)) (internal quotation marks omitted). “Thus, a court analyzing probative value considers the importance of the evidence and the significance of the issues to which the evidence relates.” Gray, 408 S.C. 610, 759 S.E.2d 165.

“Unfair prejudice means an undue tendency to suggest decision on an improper basis.” State v. Wiles, 383 S.C. 151, 158, 679 S.E.2d 172, 176 (2009). “Unfair prejudice does not mean the damage to a defendant’s case that results from the legitimate probative force of the evidence; rather it refers to evidence which tends to suggest decision on an improper basis.” State v. Gilchrist, 329 S.C. 621, 630, 496 S.E.2d 424, 429 (Ct. App. 1998) (quoting United States v. Bonds, 12 F.3d 540, 567 (6th Cir.1993)). “[A]ll evidence is meant to be prejudicial; it is only unfair prejudice which must be avoided.” United States v. Rodriguez–Estrada, 877 F.2d 153, 156 (1st Cir.1989). “The term ‘unfair prejudice,’ as to a criminal defendant, speaks to the capacity of some concededly relevant evidence to lure the factfinder into declaring guilt on a ground different from proof specific to the offense charged.” Old Chief v. United States, 519 U.S. 172, 180 (1997).

In the instant case, admission of the recording was probative. It bolstered Victim’s testimony about the crime, including his identification of Williams and Appellant as the men who attacked him and fled from Poinsett Tire. See Rule 401, SCRE (“‘Relevant evidence’ means evidence having any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the

evidence.”) Because identification of the perpetrators of the assault and robbery was the central issue of Appellant’s trial, admission of the video was unmistakably relevant evidence. See id.

Further, the surveillance recording was not unfairly prejudicial to Appellant. Notably, the video was entirely consistent with trial counsel’s theory of the case: the defense did not dispute that Appellant and Williams were at Poinsett Tire or that they assaulted Victim. In fact, trial counsel’s admission that Appellant and Williams were present at the scene and attacked Victim contradicted the only grounds upon which he objected to the recording’s admission: that you could not see the faces of the men and that the recording did not show the crime itself. Because the evidence was not unfairly prejudicial, the trial judge properly allowed its introduction at trial. See Rule 403, SCRE (saying relevant evidence may be excluded only if its probative value is **substantially** outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury . . . .)

#### **Harmless Error**

Even if the admission of the recording was improper, its admission was harmless error. The evidence presented at trial left no room for doubt as to his guilt.

Generally, appellate courts will not set aside convictions due to insubstantial errors not affecting the result. State v. Bryant, 369 S.C. 511, 518, 633 S.E.2d 152, 156 (2006); State v. Heller, 399 S.C. 157, 171, 731 S.E.2d 312, 320 (Ct. App. 2012). Thus, an insubstantial error not affecting the result of the trial is harmless where a defendant’s guilt has been conclusively proven by competent evidence such that no other rational conclusion can be reached. Bryant at 518, 633 S.E.2d at 156. “A harmless error analysis is contextual and specific to the circumstances of the case: No definite rule of law governs a finding of harmless error; rather the materiality and prejudicial character of the error must be determined from its relationship to the

entire case. Further, it is well settled that the admission of improper evidence is harmless where it is merely cumulative to other evidence.” Heller, 399 S.C. at 171, 731 S.E.2d at 320

In the instant case, admission of the surveillance recording, if improper, was undoubtedly harmless error. As argued by trial counsel, the video did not show the faces of the two men who entered and left Poinsett Tire. However, multiple witnesses, including Victim, identified Appellant as one of the men who committed the crime. Victim’s testimony was also corroborated by several witnesses, including police officers, who saw him during and immediately after the events of the car chase. Additionally, evidence of the robbery was confirmed by the large amount of cash on Williams and scattered around the crime scene. The State also takes exception to the fact that Appellant’s conviction was “elevated” based on the presence of the armed robbery: independent of the evidence of armed robbery, the evidence supported finding Appellant guilty of first-degree robbery. Section 16-3-600 provides:

(C)(1)A person commits the offense of assault and battery in the first degree if the person unlawfully:

(b) offers or attempts to injure another person with the present ability to do so, and the act:

(i) is accomplished by means likely to produce death or great bodily injury.

S.C. Code Ann. § 16-3-600 (C) (Supp. 2011). The statute defines “great bodily injury” as “bodily injury which causes a substantial risk of death or which causes serious, permanent disfigurement or protracted loss or impairment of the function of a bodily member or organ.”

S.C. Code Ann. § 16-3-600 (A)(1) (Supp. 2011). Notably, the men attacked Victim with a gun and stun gun inside Poinsett Tire. During the chase, Appellant fired a bullet at Victim. None of

these claims were disputed by the defense and each of these events justified a finding of guilt for first-degree assault and battery independent of robbery.

Accordingly, the error alleged by Appellant is harmless. See Bryant at 518, 633 S.E.2d at 156.


**CONCLUSION**

For all the foregoing reasons, it is respectfully submitted that the judgment and conviction of the lower court be affirmed.

Respectfully submitted,

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May 14, 2021.

STATE OF SOUTH CAROLINA  
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APPEAL FROM GREENVILLE COUNTY  
The Honorable Robin B. Stilwell, Trial Judge  
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Appellate Case No. 2018-001120

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LEVITICUS D. YOUNG,

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STATE OF SOUTH CAROLINA,

Respondent.

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**PROOF OF SERVICE**

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Pursuant to the Supreme Court's Order "RE: Operation of the Appellate Courts During the Coronavirus Emergency," dated March 20, 2020, the undersigned hereby certifies a true copy of the Brief of Respondent pursuant to White v. State has been served upon opposing counsel by sending to opposing counsel's primary e-mail address as listed in the Attorney Information System (AIS):

Kathrine H. Hudgins, Esquire  
khudgins@sccid.sc.gov

This 14th day of May, 2021.



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**May 14 2021**

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SC Court of Appeals

**Caroline Collins**

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**From:** Caroline Collins  
**Sent:** Friday, May 14, 2021 11:24 AM  
**To:** Hudgins, Kathrine  
**Cc:** Stock, Chris; Bill Schumacher  
**Subject:** Leviticus Donyaski Young v. State of South Carolina (2018-001120)  
**Attachments:** YOUNG Leviticus - Representation Letter - 2018-001120 (02579162xD2C78).PDF; YOUNG Leviticus - Brief of Respondent - 2018-001120 (02579165xD2C78).PDF

Good Morning Ms. Hudgins,

Attached please find a copy of a representation letter and the Brief of Respondent in Leviticus Donyaski Young v. State of South Carolina (2018-001120). These documents will be submitted to the Court of Appeals today via the AIS One Drive System.

If you will, please reply to this email to confirm receipt.

Thank you!

*Caroline Collins*

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