THE STATE OF SOUTH CAROLINA
In The Supreme Court

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S.C. SUPREME COURT

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G. Thomas Cooper, Circuit Court Judge

Appellate Case No. 2019-001063
Trial Court Case No. 2016-CP-40-06960

Dennis J. Powell, Jr., Respondent,

v.

Mark Keel, Chief, State Law Enforcement Division, and the State of South Carolina Appellants.

RETURN TO PETITION FOR REHEARING

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QUESTION PRESENTED

SHOULD THIS COURT REHEAR THIS APPEAL AND RECONSIDER ITS OPINIONS THAT LIFETIME REGISTRATION FOR ALL LEVELS OF OFFENDERS WITHOUT AN OPPORTUNITY FOR JUDICIAL REVIEW TO ASSESS RISK VIOLATES DUE PROCESS, AND THAT THE FINDINGS OF THE CIRCUIT COURT JUSTIFIED RESPONDENT'S REMOVAL FROM THE REGISTRY?

Respondent respectfully submits his Return and requests Appellants' Petition for Rehearing be denied.

Petitions for Rehearing must be based upon points overlooked or misapprehended by the Court. Rule 221(a), SCACR. This Court did not overlook or misapprehend any material fact or principle of law.

Appellants' Petition includes three broad contentions concerning the Court's unanimous opinion in this matter. First, they contend the Court should "follow its own longstanding precedent" and revisit its decision in this case in order to "reaffirm…decades of jurisprudence and find that South Carolina's uniform treatment of all sex offenders is not arbitrary nor unconstitutional." (Petition for Rehearing, 3, 7). Second, Appellants contend this Court wrongly acted "to essentially re-write the South Carolina Legislature's stated purpose of SORA." (*Id.* at 5). Third, Appellants argue this Court should not have found that the circuit court proceedings in this case were an "acceptable process for removal from SORA" and that the lower court erred in its findings regarding risk of recidivism. (*Id.* at 7, 8).

I. Presumption of Constitutionality and Precedent

As to their first contention, Appellants fail to state how the Court overlooked or disregarded the presumption of constitutionality of a statute. This Court did not overlook this. To the contrary, the Court specifically utilized this standard for its review in this case, referencing *Curtis v. State*,[1]

[1] 345 S.C. 557, 569, 549 S.E.2d 591, 597 (2001), cited in both Final Briefs

("This Court has a limited scope of review in cases involving a constitutional challenge to a statute because all statutes are presumed constitutional and, if possible, will be construed to render them valid,") and *Joytime Distribs. & Amusement Co. v. State*[2] ("A legislative act will not be declared unconstitutional unless its repugnance to the constitution is clear and beyond a reasonable doubt."). The presumption of statutory constitutionality undergirds the Court's opinion in this case as it has in its previous SORA cases. Indeed, the Court affirms its prior holdings in a fairly long line of cases that the "State has a legitimate interest in requiring sex offender registration." *Powell v. Keel*, Op. No. 28033 p. 7 (Shearouse Adv. Sh. No. 19).

In their argument that the Court overlooked controlling precedent, Appellants re-cite previous SORA cases.[3] None were overlooked by the Court. Each was cited by the circuit court in its Order, by both parties on brief, and by this Court in its opinion. As to precedent, the Court did not reverse prior holdings related to the rational relationship analysis, which the Court expressly cites. This opinion was limited to the due process challenge. The Court did not address Respondent's Equal Protection, Eighth Amendment, or Ex Post Facto clause challenges (*Powell* at 13, n.5). To the extent *Powell* conflicts with *Hendrix v. Taylor*, decided in 2003, the Court overruled it. (*Powell* at 8, n.1). In so doing, Respondent submits the Court carefully analyzed the questions presented and cited its prior opinions for support throughout its opinion in *Powell*. (e.g.: p.7 "Indeed, a likelihood of re-offending lies at the core of South Carolina's civil statutory scheme." *Dykes*, 403 S.C. at 507, 744 S.E.2d at 510; "This Court has previously recognized the State's

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[2] 338 S.C. 634, 640, 528 S.E.2d 647, 650 (1999), cited in Final Brief of Appellants.

[3] *State v. Walls*, 348 S.C. 26, 31, 558 S.E.2d 524, 526 (2002); *Hendrix v. Taylor,* 353 S.C. 542, 579 S.E.2d 320 (2003); *In re Ronnie A*., 355 S.C. 407, 585 S.E.2d 311 (2003); *State v. Dykes*, 403 S.C. 499, 744 S.E.2d 505 (2013); *In re Justin B*., 419 S.C. 575, 799 S.E. 2d 675 (2017).

legitimate interest in requiring sex offender registration. *See In re Justin B.*, 405 S.C. 391, 408, 747 S.E.2d 774, 783 (2013)).

Appellants fail to state accurately the Court's limited holding or show how the Court misapprehended its authority to make a due process analysis. Nor do they explain how the next step in the Court's reasoning misapprehended the standard governing the presumption of constitutionality. Based in part on its precedent from *State v. Dykes*, that lifetime sex offender registration with ancillary burdens and consequences "implicates a protected liberty interest to be free from permanent, unwarranted governmental interference,"[4] the Court applied the rational relationship test. That analysis was expressly guided by precedent: implicating a protected liberty interest requires the statute to bear a reasonable (rational) relationship to a legitimate government interest.

Applying the rational relationship test to the SORA, as amended, and its implementation, this Court found that lifetime registration *without any opportunity for judicial review* is not rationally related to the legislature's stated purpose. (*Powell* at 7, emphasis added). "SORA's lifetime registration requirement without any opportunity for judicial review to assess the risk of reoffending is arbitrary and cannot be deemed rationally related to the legislature's stated purpose of protecting the public from those with a high risk of re-offending. Indeed, "a likelihood of re-offending lies at the core of South Carolina's civil statutory scheme." *Dykes*, 403 S.C. at 507, 744 S.E.2d at 510; *see* S.C. Code Ann. § 23-3-400 (2007 & Supp. 2020) ("Statistics show that sex offenders often pose a high risk of re-offending.").

Rather than disregarding precedent, the Court relied on its precedential finding of the implication of a liberty interest in its due process analysis of the statute. Here's the irony:

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[4] *Id.* at 506, 744 S.E.2d at 509.

Appellants tout the (Court-recognized) legitimacy of the stated purposes of the statute itself. But, they expect this Court to ignore any review of purpose-related outcomes reviewable from successive decades of implementation of sex offender registration in South Carolina and across the nation. That experience includes statutory changes, advances in technology, research, and multi-jurisdictional jurisprudence, which this Court did not overlook, but instead recognized and referenced (*See Powell* at 4, 7, 8, 11, 12, n.3, n.4.).

Stare Decisis, Appellants contend, binds this Court to ignore inconvenient truth that did not exist or was not brought forward in previous SORA cases. That the record in this case includes information from nationwide sources and other cases on the changing nature of sex offender registration but is devoid of state statistics from SORA's 1994 implementation over time seems lost on Appellants. Appellants even secured and presented testimonial evidence to the circuit court from the Major of the SLED Criminal Justice Information System that operates and maintains the Sex Offender Registry. (R. pp. 245-247). Still, nothing in the record or on appeal included statistical or other evidentiary support regarding a link between sex offender registration and crime prevention because all sex offenders have "statistically higher rates" of re-offense. The circuit court found "[N]o evidence has been presented indicating all sex offenders reoffend at the same rate; nor has any statistical evidence been presented... The State has offered no evidence that the SORA has reduced sex offenses overall in South Carolina…" (R. p. 19).

Appellants' pull language from Chief Justice Roberts's concurrence in *June Med. Servs. L.L.C. v. Russo*[5], citing the *Federalist Papers* for the proposition that this Court is barred from revisiting a ripe constitutional challenge to a state statute, while ignoring (1) this Court's own

[5] 140 S.Ct. 2103, 2017 L.Ed. 566 (2020); Petition for Rehearing, 4.

precedent[6], (2) U.S. Supreme Court precedent[7], and (3) our state Constitution. This Court's own rules permit argument against precedent and Respondent was granted permission to do so in this case. Rule 217, SCACR. Civil Rights in this country have historically been protected by thoughtful constitutional judicial review of legislation, particularly involving less popular individuals or groups with little power. This is the heart of the role of this Court. *See* S.C. Const. Art. I, Sec. 8 *Separation of Powers*. In the same concurrence cited by Appellants, Chief Justice Roberts says "stare decisis requires us, absent special circumstances, to treat like cases alike." *June Med. Svs. L.L.C. v. Russo* at 2134. This case is not "like" the others. And, notably, the issue in *June Med. Svs.* did not involve a protected liberty interest. In *Ramos v. Louisiana*, 140 S.Ct. 1390, 1405, 206 L. Ed. 2d 583 (2020), which did involve a liberty interest, the U.S. Supreme Court held "no one on the Court today is prepared to say [the case being overturned, regarding life sentences for juveniles] was rightly decided, and stare decisis isn't supposed to be the art of methodically ignoring what everyone knows to be true. Of course, the precedents of this Court warrant our deep respect as embodying the considered views of those who have come before. But stare decisis has never been treated as an "inexorable command." And the doctrine is "at its weakest when we interpret the Constitution" because a mistaken judicial interpretation of that supreme law is often "practically impossible" to correct through other means."" *Id.* at 1405[8].

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[6] *Paradis v. Charleston Co. School District*, Op. No. 28030 (Shearouse Adv. Sh. 19) (not a constitutional case); *Elam v. Elam*, 275 S.C. 132, 268 S.E.2d 109 (S.C. 1980) ("While this Court adheres to the principle of stare decisis, it should not be applied to "effect a petrifying rigidity" in common law.").

[7] *E.g. Brown v. Board* of Education *of Topeka*, 347 U.S. 483 (1954); *Miller v. Alabama*, 567 U.S. 460, 132 S.Ct. 2455, 183 L.Ed.2d 407 (2012); *Jones v. Mississippi*, 141 S.Ct. 1307 (2021)

[8] Citing *Agostini v. Felton*, 521 U. S. 203, 235 (1997). *Payne v. Tennessee*, 501 U. S. 808, 828 (1991) (internal quotation marks omitted). *Franchise Tax Bd. of Cal. v. Hyatt*, 587 U. S. ___ (2019) (slip op., at 17).

This Court decided this case unanimously. It involved a protected liberty interest and was decided on a constitutional claim. Mr. Powell's case is unlike other SORA cases brought before this Court, both related to his offense, his sentence, and the implementation of the SORA to him. *Walls* was decided on Eight Amendment grounds. *Hendrix* involved an out of state conviction and was overruled to the extent it conflicts. *Justin B.* and *Ronnie A.* were juveniles. *Dykes* involved electronic monitoring. About *Dykes*, Appellants erroneously state "This specific [identical due process] claim was rejected in the 2013 Dykes case." (Petition for Rehearing, 7). But, *Dykes* was a sexually violent predator satellite monitoring case. (In that case, however, and as cited in *Powell*, this Court first recognized the implication of a liberty interest implicating due process.). All of the previous cases involved actual crime victims. And, SORA has morphed since 1994 due both to amendments, to technology, and to SLED's implementation. The Court now knows there is no data to support a reasonable relationship between the SORA's lifetime requirement for all offenders without opportunity for judicial review and the liberty interests implicated for 100% of all registrants.

Respondent, the facts of his case, the circuit court, and relevant judicial opinions placed all of this squarely before this Court. Contrary to Appellants' contention, the Court's opinion in this case is consistent with even the most restrained understanding of the role of our judicial branch.

Likewise, to the extent Appellants contend this Court misapprehended due process analysis, they seem to object to this Court's research into, and consideration of, the laws of the other forty-nine states and the Congress. But Appellants are wrong. First, such arguments were raised and preserved in this case. Second, consideration of the view of other arbiters of constitutional norms is not mere windvaning. It is structuralism. Most simply put, structuralism assumes that the other branches also have a duty to adhere to the constitution. Appellate courts

routinely employ structuralism. See Brandon Murrill, *Modes of Constitutional Interpretation,* Congressional Research Service, March 15, 2018; and Casey L. Westover, *Structural Interpretation and the New Federalism: Finding the Proper Balance Between State Sovereignty and Federal Supremacy*, 2005 Marquette Law Review 693, at 695. In this instance, fifty executive branches, fifty legislative branches, the U.S. Congress, and a host of judicial branches have reached the conclusion that lifetime registration for all with no meaningful path off of a sex offender registry runs afoul of constitutional norms.

Having failed to allege how any step in this Court's due process analysis, including the application of the rational relationship test, misapprehended the standard governing the presumption of constitutionality of state statutes, Appellants' contention fails.

II. The Court as Super-Legislature

Appellants' second contention, that this Court usurped legislative power and acted to "essentially re-write" the SORA, also fails. Far from engaging in law-writing, this Court's decision was restrained and deferential. "We recognize the development of a judicial review process is a matter best left to the General Assembly… [W]e are confident in the General Assembly's ability to fulfill our request to fashion the particulars of the hearing process." *Powell* at 8, 9.

First, the Court exercised judicial restraint, carefully avoiding unnecessary or extraneous issue or arguments, and ruling on constitutionality on one basis alone. Second, recognizing that the lower court's order would have effectively ended internet publication of the registry immediately, this court deferred to the other branches when it preserved Appellants' statutory interpretation and practice by upholding internet publication, despite the fact that a majority of jurisdictions "specifically require dissemination of sex offender registry information on the internet by statute" and South Carolina does not. *Powell*, n.4.

Additionally, Appellants cite *Hodges v. Rainey*[9] for the premise that "courts are bound to give effect to the expressed intent of the legislature," and argue the Court misapprehended legislative intent. "Notably absent from [the] espoused purpose is any language that could be construed as legislative intent limiting this purpose or the need to protect the public from only individuals determined to have a high risk of re-offending," they argue. (Petition for Rehearing, 5).

The Court overlooked nothing here. The SORA explicitly states "Statistics show that sex offenders often pose a high risk of re-offending." S.C. Code Ann. § 23-3-400 (2007 & Supp. 2020). In *Dykes*, which Appellants argue involved "this specific claim"[10] this Court found "a likelihood of re-offending lies at the core of South Carolina's civil statutory scheme." *Id., supra.* at 507. Precisely tied to the express legislative language, this Court concluded "Because SORA does not provide a mechanism to evaluate a registrant's individual risk of recidivism, it "is not tied to the relative public safety risk presented by the particular registrants and is excessive with respect to the purpose for which it was enacted." (*Powell* at 8, internal citation omitted).

Finally, as other courts have done, this Court might have suggested or even mandated a specific remedy or rewrite of the statute. This Court might have explained the approaches of other states. The Court might have reviewed the model federal act, discussed tiering of offenses, suggested a judicial review process, or detailed constitutionally acceptable potential remedies. Instead, and in keeping with Justice Few's concurrence in *Buchanan v. S.C. Prop. & Cas. Ins. Guar. Ass'n*,[11] cited by Appellant ("if…courts have the authority to interpret statutes according to a sense of justice and right, then courts would have the power to rewrite statutes to suit their own

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[9] 341 S.C. 79, 85, 533 S.E.2d 578, 581 (2000).
[10] It did not.
[11] 424, S.C. 542, 553, 819 S.E.2d 124, 130 (2018).

personal preferences, regardless of legislative intent. Courts do not have that power,") this Court deferred to the elected branch. Respondent submits such deference is not the work of a court bent on super-legislating. For these reasons, Appellants' second contention also fails.

In reality, Appellants' first two arguments suggest a misunderstanding of the bases for rehearing. They do not state how the court overlooked or misapprehended the presumption of constitutionality or the doctrine of *stare decisis.* Indeed, these same arguments were put forward at the trial level, at briefing, and at oral argument. With few exceptions, the same cases cited in the Petition for Rehearing were already reviewed and cited by the circuit court, both parties, and this Court. Regardless of the facts of each case, the arguments, the legal issues, the evidence properly before the court, and the limited issues raised and decided by the previous courts, Appellants argued and continue to argue the registry-related opinions of this Court preclude meaningful review in any subsequent case and are permanently binding on this court. But while it may be convenient for Appellants to pretend that CSC 1st degree on a five-year-old child (*e.g., Justin B.*) is factually identical to solicitation of a minor when the "minor" was a police officer running an internet sting, this Court is not bound to so recklessly conflate such divergent sets of facts in a constitutional analysis of a rational relationship between legislative intent and protected liberty interest. *Justin B.* did not present a due process challenge to this Court, instead pursuing arguments centered around his status as a juvenile. However, once raised and preserved by Respondent and the circuit court, this Court was not free to summarily dismiss the evidence he submitted to the trial court and his legal arguments, regardless of how nuanced, simply because they were not raised in or not applicable to the previous cases that Appellants find so broad and canonical.[12]

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[12]Appellant asks this Court to "accord this decision with [its] prior decisions," and after rehashing everything but the facts, issues, and holding of *Justin B.* writes "this decision simply cannot be reconciled with the Court's decision." Petition for Rehearing, 4, 6. Yet, footnote 1 of

Appellant's final *Justin B*-focused contention is "absolutely nothing changed" since 2017. (Petition for Rehearing, 7). This fails for two reasons. First, courts are not free simply to weigh in as things change. Courts can only speak on issues and facts properly raised and submitted. Instead, when reviewing the constitutionality of a statute, the appropriate time frame to consider is the period between implementation of a statute and the case under consideration. That is exactly what this Court has done. Second, this contention fails because much has changed since this statute's implementation in 1994, since *Hendrix* in 2003, and even since *Justin B*. Society has changed, technology has advanced, statistics and evidence have been gathered, studies have been conducted, scholars have published, elected branches have changed and amended, and courts have weighed in. Additionally, though it may not concern Appellants, Respondent has been regularly impacted by the registry while living an offense-free, commendable life. Much indeed.

Appellants suggest this Court opposes uniformity, in contravention of the State's will. Contrary to Appellants' allegations, the Court has not held that "uniform" lifetime registration is unconstitutional. That is a misunderstanding of the opinion. The Court cited earlier cases approving lifetime registration and limited its conclusion to "SORA's lifetime registration requirement *without any opportunity for judicial review to assess the risk of reoffending* is arbitrary and cannot be deemed rationally related to the legislature's stated purpose of protecting the public from those with a high risk of re-offending." *Powell* at 7, emphasis added. The opinion does not preclude the state from maintaining uniform lifetime registration, as long as all have meaningful access to judicial review. That might not have been Respondent's preference or the most elegant

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Powell overrules conflicting portions of *Hendrix v. Taylor*, *supra*. *Hendrix* predated *Justin B*, which relied in limited respects on *Hendrix*. While *Hendrix* has other descendants, they are short of a gaggle. Appellants have a host of lawyers at their disposal and can certainly figure out the impact of this Court's limited ruling on the limited progeny of *Hendrix*.

path forward, but this Court's decision would not preclude such an approach. Similarly, Appellants know a tiered system, where varying levels of offenders would be removed after specified years of good behavior, like most states have adopted, would also be uniform and in compliance with the opinion if coupled with judicial review. Whether intentional or not, it is unsettling to read Appellants' implication the Court is opposed to a "uniform" system if that is what the elected branch wants. Such terminology mischaracterizes the Court's restrained ruling.

III. Risk and Removal

Appellants' final contention - that this Court should not have found that the circuit court proceedings supported Respondent's removal and that the lower court erred by finding he had "zero" risk of reoffending - is perhaps the most disingenuous. (Petition for Rehearing, 7, 13).

The first prong of Appellants' final contention—that this Court found the procedure in this case was acceptable process for future cases—is accurate but incomplete. This Court found Respondent was afforded a hearing, during which the circuit court assessed Respondent's risk of reoffending. This Court's only characterization of that hearing was that it was sufficient to satisfy due process and while acceptable it was not the only acceptable process. This Court specifically left to the elected branches the establishment of such a process going forward.

The second prong of Appellant's final contention—that evidence is not "actual" evidence—is dizzying. (Petition for Rehearing, 8). At the trial level, the court assessed Respondent's risk of reoffending. Appellants argue "no actual evidence was submitted into the evidentiary record." The record in this matter reveals that after Respondent filed his Petition, Appellants moved for Summary Judgment. During the course of competing motions and hearings, each party offered affidavits, records, transcripts, documents, and proposed stipulations. They

were all admitted as evidence before the circuit court because there was universal agreement. Not a single offering was rejected or contested by either party. Contrary to Appellants'' new position, all documents were in fact evidence before the circuit court at the request of, or with the consent of, Appellants. As a matter of fact and in the record in this case, Respondent provided sworn affidavit testimony and a great deal of evidence to the circuit court, admitted without objection (R. pp. 82-98, 117-144, 182, 184-185, 258-271, 374-376). Appellants had actual hearings, before an actual court, and were never denied any request to offer evidence, actual or otherwise.[14] Appellants contend "no testimony was taken, no documents were authenticated, and no *actual* evidence was submitted." Petition for Rehearing, 7-8, (emphasis added). Then, they turn around and allege that the "circuit court did not view the evidence in the light most favorable to...the non-moving parties,... [and] completely disregarded the actual affidavits and medical records." Petition for Rehearing, 8. After the hearings, and consideration of the evidence before it, the circuit court ordered SLED to remove Respondent from the registry.[15] That parties agreed to evidence admitted by the court for its consideration does not make it non-evidence.

In summary, the first two prongs of Appellants' final contention fail because the record reveals two sets of counsel not willing to waste time and resources arguing over evidence that was not in dispute and/or ultimately admissible. In reality, Appellants were the most experienced counsel in handling registry cases and, as their entire case has made clear, were confident that *stare*

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[14] Suppose the elected branches adopt some version of the federal model, with tiering and a judicial review process requiring courts to consider factors such as: criminal record, work record, behavior since conviction, opinion of any experts offered by either party, outcome of a validated risk assessment instrument as administered to the registrant, testimony of any victim(s) and of the applicant. Appellants seem to argue even if *all of this* was before the trial court in such a case, as in this case, a full-blown trial would still be necessary, relegating to impertinence the rules of procedure, rules of evidence, res judicata, and judicial economy. Respondent disagrees.

[15] Initially stayed, pending appeal.

decisis absolutely precluded any and all meaningful review, regardless of facts, regardless of arguments, regardless of law, and regardless of history and years of experience. Appellants did not seek a trial or any additional formal hearing precisely because they are experienced in such cases and because they had no doubts. In Appellants' view, *Justin B.* was the final chapter and the canon was closed forever.

The third prong of Appellants' final contention, that the trial court erred by finding that the Respondent's recidivism rate is zero percent, is wrong, though perhaps unintentional. Throughout these proceedings, Appellants have been fixated on this finding. Appellants contend the trial court's findings about Respondent's recidivism risk amounted to "reversible error" contradicted by the record, which this Court "authorized." (Petition for Rehearing, 8). "The trial court inexplicably found that the Respondent was no risk of reoffending and that his recidivism rate is zero percent," they argue.

Appellants are mistaken because they conflate recidivism rate with recidivism risk. Recidivism rate is historical, knowable, and measurable for any group or individual over a specific time period. The closest thing to national standard is three years from release from custody, but recidivism rate can be measured for any time period. So, Respondent's recidivism rate from the date of his conviction until now, over thirteen years later, is in fact zero. The circuit court got that right. However, recidivism risk is a predictive term. As this Court's opinion implicitly acknowledges, criminogenically predictive factors, decades of study, validations against actual outcomes, and accurate statistics and analysis have made predicting recidivism risk more science than guesswork. And that is true for sex offenders. However, in part because past criminal conduct never goes away, it is also true that no validated risk assessment instrument will ever conclude that any living offender is mathematically zero risk to reoffend. Effectively zero, yes. Absolutely zero,

no. The trial court understood this and simply did not find "Respondent was of no risk of reoffending." Regarding recidivism risk, the court expressly cited findings from Dr. Thomas V. Martin's affidavit in its order: "Plaintiff's registration is detrimental and he is of **low risk** to re-offend." (R.p.3, emphasis added). The trial court stated "it is uncontested that Plaintiff's recidivism **rate** is zero percent." (R.17, emphasis added). Likewise, this Court's opinion acknowledges, "SORA does not provide a mechanism to evaluate a registrant's individual risk of recidivism." (*Powell* 8). Neither the trial court nor this Court have misapprehended or conflated recidivism risk with recidivism rate; only Appellants continue on that path.

For all of these reasons, the Petition for Rehearing should be denied.

Respectfully submitted,

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