

SUPREME COURT OF MARYLAND

John Orlando Satterfield v. State of Maryland

Satterfield v. State, Misc. No. 10, Sept. Term, 2022 (Md. Apr. 24, 2023) · No. Misc. No. 10, September Term, 2022 · Decided September 5, 2023

SUMMARY

The Supreme Court of Maryland affirmed the denial of John Orlando Satterfield’s petition for post-conviction DNA testing under Maryland Criminal Procedure § 8-201. The Court held that testing a cigarette butt found near the crime scene did not have a reasonable probability of producing exculpatory or mitigating evidence. The Court also held that the circuit court was not required to hold a hearing or permit a reply to the State’s answer, although it did not comply with one procedural rule and remand would have been futile.

CASE DETAILS

COURT	Supreme Court of Maryland
WRITING FOR THE COURT	Hotten, J.; Fader, C.J.; Watts, J.; Booth, J.; Biran, J.; Gould, J.; Eaves, J.
JURISDICTION	Maryland
DECIDED	September 5, 2023
DOCKET	Misc. No. 10, September Term, 2022
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from the Circuit Court for Baltimore County's denial, without a hearing or explanation, of a petition for post-conviction DNA testing under Maryland Code, Criminal Procedure § 8-201.
STANDARD OF REVIEW	The Court reviews de novo the legal standard used by the circuit court and interprets the post-conviction DNA testing statute and rules de novo. It reviews the circuit court's determination that a reasonable probability exists that DNA testing could produce exculpatory or mitigating evidence for clear error.
PRECEDENTIAL VALUE	published and precedential
PARTIES	John Orlando Satterfield v. State of Maryland

TOPICS

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QUESTIONS PRESENTED

1. Whether Satterfield demonstrated a reasonable probability that DNA testing of the cigarette butt had the scientific potential to produce exculpatory or mitigating evidence under Criminal Procedure § 8-201(d)(1)(i).
2. Whether the circuit court was required to hold a hearing before denying the petition under Maryland Rule 4-709.
3. Whether the circuit court was required to await or consider a petitioner's response to the State's answer under Maryland Rules 4-707 and 4-708.
4. Whether the circuit court's failure to provide written reasons for denying the petition without a hearing required remand under Maryland Rule 4-709(e).

HOLDINGS

1. A petitioner seeking post-conviction DNA testing must demonstrate a reasonable probability that the requested testing has the scientific potential to produce evidence tending to clear the petitioner of guilt, establish innocence, or mitigate the conviction or sentence. Satterfield failed to make that showing because a match to either witness would not tend to disprove his guilt or negate his presence at the crime scene.
2. The circuit court was not required to hold a hearing before denying the petition because, as a matter of law, the facts alleged did not entitle Satterfield to relief under § 8-201.
3. Maryland Rules 4-707(a) and 4-708 do not require a circuit court to await or consider a petitioner's response, or the expiration of the response period, before denying a petition when the Rule 4-707(a) grounds for denial are satisfied. The petitioner therefore was not entitled to submit a response before the circuit court ruled.
4. Although the circuit court failed to comply with Maryland Rule 4-709(e)'s requirement that an order denying a petition without a hearing state why no hearing is required, remand was unnecessary because it would be futile.

KEY QUOTATIONS

“The results need not exonerate the petitioner or prove that someone else committed the crime.” (at 10-11)

“We hold that Petitioner has failed to establish that a reasonable probability exists that the DNA testing of the cigarette butt has the scientific potential to produce exculpatory or mitigating evidence.” (at 30)

FACTUAL BACKGROUND

Satterfield was convicted of participating in a 2006 home-invasion robbery during which Eric Fountain was shot and killed and Randy Hudson was injured. A cigarette butt recovered with other trash and debris in an alley near the victims' home contained female DNA, excluding Satterfield as the source; Satterfield sought additional testing to determine whether the DNA belonged to witnesses Tori Kucz or Chalene Smith and thereby impeach their credibility. The record also contained eyewitness testimony, testimony placing Satterfield with the participants, a firearm and ammunition linked to the shooting, cell-phone evidence, and Satterfield's DNA on a hat recovered from the property.

PROCEDURAL HISTORY

Satterfield was convicted in the Circuit Court for Baltimore County of fourteen offenses, including first-degree murder, and received a sentence of life imprisonment plus 150 years. The Appellate Court of Maryland affirmed his convictions in 2010, and his later petition for ordinary post-conviction relief was denied. In 2022, he filed a petition seeking DNA testing of a cigarette butt recovered near the crime scene; the circuit court denied it without a hearing, denied reconsideration, and the Appellate Court transferred the appeal to the Supreme Court of Maryland.

DISPOSITION

affirmed

CASES CITED

- Edwards v. State, 453 Md. 174, 185, 188-200, 160 A.3d 642, 649, 651-57 (2017)
- Jackson v. State, 448 Md. 387, 399, 408-11, 139 A.3d 976, 983, 988-90 (2016)
- Fuster v. State, 437 Md. 653, 663-68, 671, 89 A.3d 1114, 1120-24 (2014)
- Givens v. State, 459 Md. 694, 705-17, 188 A.3d 903, 909-16 (2018)
- Beaman v. State, 453 Md. 407, 420-22, 162 A.3d 864, 872-73 (2017)
- Wallace v. State, 452 Md. 558, 578-79, 158 A.3d 521, 532-33 (2017)
- Simms v. State, 445 Md. 163, 167, 126 A.3d 25, 28 (2015)
- Blake v. State, 418 Md. 445, 15 A.3d 787 (2011)
- Blake v. State, 395 Md. 213, 222-24, 909 A.2d 1020, 1025-26 (2006)
- Gregg v. State, 409 Md. 698, 717, 976 A.2d 999, 1009 (2009)
- Arey v. State, 400 Md. 491, 506-07, 929 A.2d 501, 510 (2007)
- Administrative Office of the Courts v. Abell Foundation, 480 Md. 63, 83, 86-87, 279 A.3d 976, 987, 989-90 (2022)
- Elsberry v. Stanley Martin Companies, LLC, 482 Md. 159, 179, 190, 286 A.3d 1, 12, 19 (2022)
- State v. Weems, 429 Md. 329, 337, 55 A.3d 921, 926 (2012)
- State v. Johnson, 415 Md. 413, 422, 2 A.3d 368, 373 (2010)
- Lowery v. State, 430 Md. 477, 496, 61 A.3d 794, 806 (2013)
- Hurst v. State, 400 Md. 397, 417, 929 A.2d 157, 168 (2007)

- Burson v. Simard, 424 Md. 318, 324, 35 A.3d 1154, 1157 (2012)
- Long v. State, 343 Md. 662, 668, 684 A.2d 445, 448 (1996)
- Green v. State, 456 Md. 97, 141, 171 A.3d 1162, 1187 (2017)
- State v. Matthews, 415 Md. 286, 298, 999 A.2d 1050, 1057 (2010)
- District Attorney's Office for the Third Judicial District v. Osborne, 557 U.S. 52, 62, 129 S. Ct. 2308, 2316 (2009)

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