

SUPREME COURT OF SOUTH CAROLINA

State v. Bryant, 390 S.C. 638

704 S.E.2d 344 (2011) · No. No. 26906 · Decided January 7, 2011

SUMMARY

The Supreme Court of South Carolina affirmed Stephen Corey Bryant’s convictions and sentences, including a death sentence for murder committed during an armed robbery. The court held that excluding testimony from Bryant’s aunt about her own sexual abuse did not warrant reversal because experts had presented evidence of the intrafamilial abuse, and it upheld the sentence after mandatory proportionality review.

CASE DETAILS

COURT	Supreme Court of South Carolina
WRITING FOR THE COURT	Justice Pleicones; Chief Justice Toal; Justice Beatty; Justice Kittredge; Justice Hearn
JURISDICTION	South Carolina
DECIDED	January 7, 2011
DOCKET	No. 26906
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from convictions and sentences entered after a capital guilty plea, consolidated with mandatory proportionality review.
STANDARD OF REVIEW	The evidentiary ruling was reviewed for abuse of discretion. Reversal additionally required a showing of prejudice; the court held that any error was harmless because the substance of the excluded evidence was presented through expert testimony.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Court of South Carolina.
PARTIES	Stephen Corey Bryant v. State of South Carolina

TOPICS

- evidence
- relevance
- standard of review
- harmless error
- sentencing

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by refusing to allow Bryant's aunt to testify that she had been sexually abused by Bryant's grandfather as part of Bryant's mitigation evidence.
2. Whether Bryant's death sentence was arbitrary, capricious, or the product of passion, prejudice, or another arbitrary factor under mandatory proportionality review.

HOLDINGS

1. The trial court did not abuse its discretion in excluding the aunt's direct testimony concerning her own abuse because the evidence was irrelevant to Bryant's mitigation case, and Bryant was not prejudiced because his mental-health and social-history experts were permitted to testify about the intrafamilial sexual abuse underlying their opinions.
2. The death sentence was not imposed as a result of passion, prejudice, or another arbitrary factor, and was neither arbitrary nor capricious.

KEY QUOTATIONS

"Accordingly, even if that ruling were error, appellant could not demonstrate prejudice warranting reversal."
(643)

FACTUAL BACKGROUND

Bryant committed a series of offenses over approximately eight days in October 2004, including three murders, burglaries, armed robbery, arson, and assault. He later threatened and seriously injured correctional officers. At sentencing, Bryant presented evidence of childhood sexual abuse, mental-health diagnoses, developmental difficulties, and substance abuse; his aunt sought to testify that she too had been sexually abused by Bryant's grandfather, but the trial court excluded that testimony as irrelevant to Bryant.

PROCEDURAL HISTORY

Bryant pleaded guilty to multiple offenses arising from a crime spree that included three murders and received a death sentence for the Tietjen murder, along with other prison sentences. During sentencing, the trial court sustained an objection preventing Bryant's aunt from testifying directly that she had been sexually abused by Bryant's grandfather. The Supreme Court of South Carolina reviewed the evidentiary ruling and conducted mandatory proportionality review.

DISPOSITION

affirmed

CASES CITED

- State v. Winkler, 388 S.C. 574, 698 S.E.2d 596 (2010)

- State v. Mercer, 381 S.C. 149, 672 S.E.2d 556 (2009)
- State v. Wyatt, 317 S.C. 370, 453 S.E.2d 890 (1995)
- State v. Shuler, 344 S.C. 604, 545 S.E.2d 805 (2001)

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