

SOUTH CAROLINA COURT OF APPEALS

State v. Mack Adams Gaines

Published Opinion No. 6142 (S.C. Ct. App. Mar. 25, 2026) · No. 2022-000567 · Decided March 25, 2026

SUMMARY

The South Carolina Court of Appeals affirmed Mack Adams Gaines's conviction and twenty-year sentence for abuse or neglect of a vulnerable adult resulting in death. The court held that sufficient evidence supported submitting to the jury whether the victim became a vulnerable adult after her fall and whether Gaines acted as her caregiver under the Omnibus Adult Protection Act.

CASE DETAILS

COURT	South Carolina Court of Appeals
WRITING FOR THE COURT	Thomas, J.; McDonald, J.; Turner, J.
JURISDICTION	South Carolina Court of Appeals
DECIDED	March 25, 2026
DOCKET	2022-000567
DISPOSITION	affirmed
PROCEDURAL POSTURE	Gaines appealed his conviction and twenty-year sentence for abuse or neglect of a vulnerable adult resulting in death after the circuit court denied his motion for a directed verdict.
STANDARD OF REVIEW	The denial of a directed-verdict motion in a criminal case is reviewed under the any-evidence standard. The court views the evidence and all reasonable inferences in the light most favorable to the State and asks whether any direct evidence or substantial circumstantial evidence reasonably tends to prove the defendant's guilt.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Mack Adams Gaines v. The State of South Carolina

TOPICS

- criminal procedure
- statutory interpretation
- appellate procedure
- standard of review
- preservation of error

PRACTICE AREAS

- criminal law
- criminal procedure
- vulnerable adult protection
- statutory interpretation
- appellate procedure

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to submit to the jury the question of whether the victim was a vulnerable adult under the Omnibus Adult Protection Act.
2. Whether the evidence was sufficient to submit to the jury the question of whether Gaines was a caregiver under the Act.

HOLDINGS

1. The evidence was sufficient to submit to the jury whether the victim was a vulnerable adult after her fall because her inability to get up or provide nourishment or heat indicated that her physical condition substantially impaired her ability to provide for her own care or protection.
2. The evidence was sufficient to submit to the jury whether Gaines was a caregiver because he provided care to the victim after her fall, even if without compensation and even if he was merely a roommate or household member.

KEY QUOTATIONS

“When reviewing a denial of a directed verdict, [the appellate court] views the evidence and all reasonable inferences in the light most favorable to the [S]tate. If there is any direct evidence or any substantial circumstantial evidence reasonably tending to prove the guilt of the accused, the [c]ourt must find the case was properly submitted to the jury.”

“The court held that “for a person to be deemed a vulnerable adult under the Act[,] the person's physical or mental condition, including advanced age, must cause a diminished ability to adequately provide for self-care or protection.””

FACTUAL BACKGROUND

Gaines lived with his ninety-two-year-old mother in her home. After she fell and remained on the floor for several days, Gaines offered her food and water, placed heaters near her, and left her there until calling 911 after she stopped communicating. Emergency personnel found her in severely neglected conditions; she developed serious medical complications, including gangrene and sepsis, and died approximately one month after the fall. Evidence also indicated that Gaines provided household assistance and was identified as the victim's primary caregiver.

PROCEDURAL HISTORY

A jury convicted Gaines in the Oconee County Circuit Court of abuse or neglect of a vulnerable adult resulting in death, and the circuit court sentenced him to twenty years' imprisonment. The court denied Gaines's directed-verdict motion challenging the sufficiency of the evidence that the victim was a vulnerable adult and that Gaines was a caregiver. The South Carolina Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Cain, 419 S.C. 24, 33, 795 S.E.2d 846, 851 (2017)
- State v. Weston, 367 S.C. 279, 292-93, 625 S.E.2d 641, 648 (2006)
- Doe v. South Carolina Department of Social Services, 407 S.C. 623, 635, 638, 757 S.E.2d 712, 718, 719-20 (2014)
- State v. Ladner, 373 S.C. 103, 120, 644 S.E.2d 684, 693 (2007)
- State v. Pinckney, 339 S.C. 346, 349, 529 S.E.2d 526, 527 (2000)
- Law v. State, 292 S.W.3d 277, 283-84 (Ark. 2009)
- State v. Boyd, 949 N.W.2d 540, 549-50 (Neb. Ct. App. 2020)

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