

No. _____

In the
Supreme Court of the United States

ARTHUR LAWTON CLARK,
Petitioner,
v.

STATE OF GEORGIA,
Respondent.

**On Petition for a Writ of Certiorari
to the Supreme Court of Georgia**

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

WERE PETITIONER'S DUE PROCESS RIGHTS VIOLATED BY THE SUPREME COURT OF GEORGIA'S OVERLY BROAD APPLICATION OF THE "INTRINSIC EVIDENCE" RULE TO PETITIONER'S CASE?

SHOULD THIS COURT RESOLVE THE CONFLICT BETWEEN THE RULING BY THE SUPREME COURT OF GEORGIA IN PETITIONER'S CASE AND THE PRECEDENT OF THE D.C. CIRCUIT COURT OF APPEALS REGARDING THE APPLICABILITY OF THE "INTRINSIC EVIDENCE" RULE TO JUSTIFY ADMISSION OF PRIOR BAD ACT EVIDENCE THAT DOES NOT OTHERWISE QUALIFY AS 404B EVIDENCE ON THE GROUNDS THAT IT "COMPLETESTHE STORY OF THE CRIME"?

SHOULD THIS COURT RESOLVE THE SPLIT IN THE CIRCUIT COURTS OF APPEAL ON THE "INTRINSIC EVIDENCE" RULE AND ADOPT THE PRECEDENT ESTABLISHED BY THE D.C. CIRCUIT COURT OF APPEALS?

LIST OF PARTIES

The caption fully identifies each of the parties to this petition.

STATEMENT OF RELATED PROCEEDINGS

- State of Georgia v. Arthur Lawton Clark, No. 15R-8538 (Superior Court of Dodge County, State of Georgia) (conviction entered: October 14, 2016, Motion for New Trial denied: April 27, 2018).
- Arthur Lawton Clark v. The State, No. S19A0367 (Supreme Court of Georgia) (decided: June 10, 2019; Motion for Reconsideration denied: July 1, 2019).

There are no additional proceedings in any court that are directly related to this case.

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Petitioner Arthur Lawton Clark respectfully prays that a Writ of Certiorari issue to review the judgment of the Supreme Court of Georgia.

CITATIONS TO OPINIONS BELOW

Petitioner was convicted on October 14, 2016 of felony murder, aggravated assault and possession of a weapon by a convicted felon. He was sentenced to life imprisonment plus 20 years.

On June 10, 2019, the Supreme Court of Georgia affirmed Petitioner's convictions and sentences. *Clark v. State*, 306 Ga. 367 (2019). (Appendix "A"). On July 1, 2019, that Court denied Petitioner's Motion for Reconsideration. (Appendix "C").

JURISDICTION

The jurisdiction of this Court is invoked pursuant to 28 U.S.C. §1257 (a).

In a correspondence dated August 30, 2019, Justice Thomas extended the time for filing Petitioner's Petition for Writ of Certiorari through and including November 28, 2019.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

This case involves the Fifth Amendment to the Constitution of the United States, which provides in relevant part:

No person shall be held to answer for a capital, or otherwise infamous crime...nor be deprived of

life, liberty, or property, without due process of law.

This case also involves the Fourteenth Amendment to the Constitution of the United States, which provides in relevant part:

Nor shall any State deprive any person of life, liberty, or property without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

STATEMENT OF THE CASE

I. Course of Proceedings

Petitioner was tried by a jury in Dodge County, Georgia on charges of malice murder, felony murder, aggravated assault and possession of a weapon by a convicted felon. He was convicted on October 14, 2016 of voluntary manslaughter, felony murder, aggravated assault and possession of a weapon by a convicted felon.

Petitioner's case involved the fatal shooting of Petitioner's brother-in-law, Mr. Sonny Barlow, following an argument between Petitioner and Mr. Barlow. Petitioner contended that he acted in self-defense. The only eyewitness to the fatal shooting was the wife of Mr. Barlow, Petitioner's sister, Ms. Susan Barlow. Over defense counsel's objection, the prosecution was permitted at trial to introduce evidence of a prior physical altercation between Petitioner and Ms. Barlow which had occurred three years prior to the fatal shooting. (Appendix "B", App. 21-App. 23).

The trial court allowed the evidence of the prior physical altercation pursuant to O.C.G.A. § 24-4-404(b). (Appendix “B”, App. 23). However, the Supreme Court of Georgia affirmed the trial court’s admission of the evidence about the prior physical altercation on a different ground, concluding that the evidence was “intrinsic” evidence that was “necessary to complete the story of the crime for the jury.” (Appendix “A”, App. 13). Therefore, the Supreme Court of Georgia ruled, the evidence “was outside the reach of Rule 404(b).” (Appendix “A”, App. 13).

II. Statement of Facts

On May 12, 2015, Petitioner traveled to his elderly mother’s home with some food he had prepared for her. Mr. and Ms. Barlow had moved into the home, although the property belonged to Petitioner’s mother. When Petitioner arrived around noon that day, Petitioner’s mother was asleep, so he returned later in the day for a visit. Upon Petitioner’s subsequent arrival at the home, Mr. Barlow behaved in a belligerent manner and demanded that Petitioner leave the premises, which Mr. Barlow referred to as “his home.” Petitioner testified that Mr. Barlow struck and kicked him, resulting in fractured ribs for which Petitioner was treated after his arrest. Mr. Barlow then brandished a shotgun as he forced Petitioner out of the house. As Petitioner backed up through the door to the deck, he tripped and hurt his leg badly. He scrambled back on his feet and backed toward his car with Mr. Barlow in pursuit. A physical struggle ensued, during the course of which Petitioner drew a gun from his belt

and shot Mr. Barlow two times. Mr. Barlow fell over onto Petitioner in the yard near Petitioner's car.

The prosecution's only eyewitness to the incident was Ms. Barlow. She testified at trial that she had witnessed the fatal shooting from a glass sliding door onto the deck. However, she had previously given inconsistent statements about where she was when the fatal shooting occurred, telling numerous witnesses that she had been inside the house and *heard* the shots before running outside where she found Mr. Barlow sprawled on top of Petitioner.

Prior to trial, the prosecution announced its intention to introduce evidence of a physical altercation between Petitioner and Ms. Barlow which had occurred three years prior to the fatal shooting. Over defense counsel's objection, the trial court permitted the prosecution to introduce the evidence of the physical altercation as similar transaction evidence pursuant to O.C.G.A. § 24-4-404(b). (Appendix "B", App. 23). The trial court did not articulate any reason for finding the evidence to be relevant and did not engage in a balancing test to determine whether the probative value of the evidence substantially outweighed the prejudicial effect, as required by Georgia law. (Appendix "B", App. 23).

Petitioner appealed his conviction to the Supreme Court of Georgia, which affirmed his conviction. (Appendix "A"). The Supreme Court of Georgia ruled that the evidence of the physical altercation was not admissible as 404(b) evidence, but rather was "intrinsic" evidence that was "necessary to complete the story of the crime for the jury." (Appendix "A", App. 13).

REASONS FOR GRANTING THE WRIT

This case presents a question of a defendant's due process right not to have irrelevant, prejudicial and remote evidence of bad character admitted at his trial. This case also involves a conflict between a state court of last resort and a United States Court of Appeal with regard to a ruling on an important federal question, ie. the intrinsic evidence rule. Finally, this case provides this Court with an opportunity to resolve a conflict among the United States Courts of Appeal about the applicability of the intrinsic evidence rule.

I. Petitioner's right to due process was violated by the Supreme Court of Georgia's overly broad application of the intrinsic evidence rule to Petitioner's case, resulting in the admission at Petitioner's murder trial of evidence of a prior physical altercation involving someone other than the victim, which evidence was irrelevant, prejudicial and remote in time to the charged offense.

Due process prohibits the introduction of evidence of a defendant's "bad character" at a criminal trial. The reasons for restricting the wholesale admission of evidence from which a jury could infer that a defendant has a bad character are obvious and well-documented. In *Spencer v. Texas*, 385 U.S. 554, 572-73 (1967) (Warren, C.J., concurring in part and dissenting in part) (footnotes omitted), Chief Justice Warren discussed the due process implications of allowing evidence of prior bad acts by the defendant to be introduced at his trial: "While this Court has never

held that the use of prior convictions to show nothing more than a disposition to commit crime would violate the Due Process Clause of the Fourteenth Amendment, our decisions exercising supervisory power over criminal trials in federal courts, as well as decisions by courts of appeals and of state courts, suggest that evidence of prior crimes introduced for no purpose other than to show criminal disposition would violate the Due Process Clause.... A jury might punish an accused for being guilty of a previous offense, or feel that incarceration is justified because the accused is a 'bad man,' without regard to his guilt of the crime currently charged. Of course it flouts human nature to suppose that a jury would not consider a defendant's previous trouble with the law in deciding whether he has committed the crime currently charged against him." See also *Old Chief v. United States*, 519 U.S. 172, 180 (1997) ("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.").

Both Federal Rule of Evidence 404 and its Georgia counterpart O.C.G.A. § 24–4–404 have codified the prohibition against the introduction of "prior bad act" evidence for the sole purpose of injecting the defendant's character into a criminal trial, except when relevant to "proving motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake, or lack of accident." FRE Rule 404(b)(2). Accord O.C.G.A. § 24–4–404(b). Before any such evidence may be admitted under these rules, the trial court must balance the probative value of the evidence

against the prejudicial impact of the evidence in order to preserve the defendant's constitutional right to a fair trial. See *Old Chief v. United States, supra*, 519 U.S. at 172-173; See also *Jones v. State*, 301 Ga. 544 (2017); *Olds v. State*, 299 Ga. 65 (2016).

Petitioner asserted a self-defense claim at trial. He asserted that Mr. Barlow had assaulted him and had threatened him with a shotgun. Petitioner sustained injuries that corroborated his claim of self-defense. The only witness to refute Petitioner's account was Ms. Barlow, who gave inconsistent accounts of what happened. At a pretrial hearing in Petitioner's case, the trial court ruled that the State could introduce evidence of a physical altercation between Petitioner and Ms. Barlow from three years prior to the fatal shooting as 404(b) evidence. The trial court did not identify the permissible purpose for the admission of this evidence and did not engage in any balancing of the probative value of the evidence against its prejudicial impact on Petitioner.

The Supreme Court of Georgia ruled that the evidence was not admissible under 404(b), but rather was "intrinsic" evidence that was "necessary to complete the story of the crime for the jury." (Appendix "A", App. 13). The Supreme Court of Georgia reasoned that the evidence of the prior physical altercation "provided context for the charged offenses to explain why the Barlows were persistent in their requests that Clark leave; why Mr. Barlow did not want Clark at his residence; why Mr. Barlow did not feel comfortable taking a shower, leaving Clark alone in the room with his wife; and why Mr. Barlow followed Clark outside of

the home to ensure that he left.” (Appendix “A”, App. 13).

The Supreme Court of Georgia’s ruling was not based on any argument that had previously been made before the trial court or considered by the trial court. Without acknowledging that the trial court had failed to articulate any basis for admitting the evidence and had failed to engage in the required balancing test, the Supreme Court of Georgia concluded that the trial court had “not abused its discretion in finding that the probative value of the evidence was not outweighed by the danger of unfair prejudice.” (Appendix “A”, App. 13). Significantly, the Supreme Court of Georgia did not engage in its own balancing test of the probative value of the evidence against the prejudicial impact.

The irrelevant, prejudicial and remote physical altercation was in no way “necessary” to “complete the story of the crime.” The prior physical altercation involving Petitioner and Ms. Barlow had no relevance to the offense for which Petitioner was on trial. The physical altercation did not involve Mr. Barlow. The physical altercation did not involve Petitioner’s claim of self-defense. Rather, the evidence of the physical altercation, served the primary purpose of prejudicing Petitioner by portraying him as someone who had behaved violently toward Ms. Barlow years earlier. The evidence of the physical altercation did nothing more than impugn Petitioner’s character unfairly and make Ms. Barlow, the only eye witness to the fatal shooting, sympathetic and credible. Finally, and most importantly, the physical altercation occurred three

years prior to the offense for which Petitioner was on trial.

The Supreme Court of Georgia's application of the intrinsic evidence rule in Petitioner's case, given the circumstances in Petitioner's case, deprived Petitioner of his due process right to a fair trial.

II. This Court should resolve the conflict between the ruling by the Supreme Court of Georgia in Petitioner's case and the precedent of the D.C. Circuit Court of Appeals regarding the applicability of the intrinsic evidence rule to justify the admission of prior bad act evidence that does not otherwise qualify as 404(b) evidence on the grounds that it "completes the story of the crime".

The Supreme Court of Georgia relied on its own prior ruling in *Williams v. State*, 302 Ga. 474, 485 (2017) to decide that O.C.G.A. § 24-4-404(b) does not apply to prior bad act evidence that is "(1) an uncharged offense arising from the same transaction or series of transactions as the charged offense; (2) necessary to 'complete the story of the crime'; or (3) 'inextricably intertwined with the evidence regarding the charged offense.'"

The admission of prior bad act evidence under the guise of "completing the story of the crime" has been expressly repudiated by the D. C. Circuit Court of Appeals. In *United States v. McGill*, 815 F.3d 846, 879–80 (D.C. Cir. 2016), the Court stated,

[I]n defining the contours of intrinsic evidence that is not subject to Rule 404(b), we have rejected the rule embraced by some of our sister circuits that evidence is intrinsic if it ‘complete[s] the story’ of the charged crime. *Bowie*, 232 F.3d at 928 (citing *United States v. Hughes*, 213 F.3d 323, 329 (7th Cir. 2000); *United States v. Carboni*, 204 F.3d 39, 44 (2d Cir. 2000)). That is because ‘all relevant prosecution evidence explains the crime or completes the story’ to some extent, and the fact that ‘omitting some evidence would render a story slightly less complete cannot justify circumventing Rule 404(b) altogether.’ *Bowie*, 232 F.3d at 929. Instead, if the government wishes to introduce such ‘other crimes’ evidence, we ‘see no reason to relieve the government and the district court from the obligation of selecting from the myriad of non-propensity purposes available to complete most any story.’ *Id.*

See also *United States v. Lorenzana-Cordon*, 141 F. Supp. 3d 35, 39 (D.D.C. 2015) (“the D.C. Circuit has criticized the distinction between ‘intrinsic’ and ‘extrinsic’ evidence, commonly invoked to avoid the procedural requirements associated with introducing ‘other crimes’ evidence pursuant to Rule 404(b). *See Bowie*, 232 F.3d at 927. Notably, ‘intrinsic’ evidence of a charged offense will always satisfy the requirements of Rule 404(b), thus the distinction serves only to ‘relieve the prosecution of Rule 404(b)’s notice requirement and the Court of its obligation to give an appropriate limiting instruction upon defense counsel’s request’ ”). The Court further stated in *Lorenzana-*

Cordon, “evidence that is ‘intrinsic’ to the crimes charged is not subject to the limitations of Rule 404(b) because, by its very nature, it does not involve ‘other crimes, wrongs, or acts,’ and thus there is no concern that it might be used as improper character evidence. *United States v. Bowie*, 232 F.3d 923, 927 (D.C.Cir.2000).”

The precedent of the D.C. Circuit Court of Appeals correctly recognizes that evidence that is intrinsic to the crime charged is necessarily a *part* of the charged offense. If a prior bad act, or other uncharged conduct, is deemed to be necessary for proof of the charged crime, then by its very nature it will satisfy one of the 404(b) requirements. The evidence of the physical altercation admitted at Petitioner’s trial was in no way a part of the offense for which he was on trial. The application by the Supreme Court of Georgia of the intrinsic evidence rule to permit the admission of the evidence of the physical altercation at Petitioner’s trial directly contravenes precedent from the D.C. Circuit Court of Appeals on this important due process issue. This Court should grant this Petition for Writ of Certiorari in order to resolve the conflict between the Supreme Court of Georgia and the precedent of the D.C. Circuit Court of Appeals with respect to the intrinsic evidence rule.

III. This Court should resolve the split in the Circuit Courts of Appeal on the applicability of the intrinsic evidence rule and adopt the precedent of the D.C. Circuit Court of Appeals.

The D.C. Circuit Court of Appeals has established an appropriately restrained precedent for the admission of prior bad act evidence at a criminal trial. By refusing to recognize a vehicle for circumventing FRE Rule 404(b) for evidence that purports to “complete the story of the crime,” the D.C. Circuit Court of Appeals stands in contrast to many other Circuit Courts of Appeal. See, e.g., *United States v. Edouard*, 485 F.3d 1324, 1344 (11th Cir. 2007) (“Evidence, not part of the charged crime but pertaining to the chain of events explaining the context, motive, and set-up of the crime, is properly admitted if [it is] linked in time and circumstances with the charged crime, or forms an integral and natural part of an account of the crime, or is necessary to complete the story of the crime for the jury.”). See also *United States v. Wilson*, 578 F.2d 67, 72 (5th Cir. 1978):

Courts and treatise writers have come to recognize an exception to the general rule of inadmissibility, by allowing the introduction of evidence of other criminal activity in order to complete the story of the crime on trial. See, e.g., *United States v. Howard*, 504 F.2d 1281 (8th Cir. 1974); *United States v. Stubblefield*, 408 F.2d 309 (6th Cir. 1969); *United States v. Bucciferro*, 274 F.2d 540 (7th Cir.), cert. denied,

362 U.S. 988, 80 S.Ct. 1076, 4 L.Ed.2d 1021 (1960).

Accord *U.S. v. Guzman*, 926 F.3d 991 (8th Cir. 2019); *U.S. v. Carpenter*, 923 F.3d 1172 (9th Cir. 2019); *U.S. v. Sutherland*, 921 F.3d 421 (4th Cir. 2019) cert granted October 2, 2019; *U.S. v. Sabeen*, 885 F.3d 27 (1st Cir. 2018); *U.S. v. Brown*, 888 F.3d 829 (6th Cir. 2018); *U.S. v. Ceballos*, 789 F.3d 607 (5th Cir. 2015); *U.S. v. Robinson*, 702 F.3d 22 (2nd Cir. 2012).

The D.C. Circuit Court of Appeals has established the correct precedent: to be considered intrinsic, evidence must be (1) evidence of an act that is part of the charged offense; and (2) evidence of some uncharged acts performed contemporaneously with the charged crime [that] facilitate the commission of the charged crime. See *United States v. Lorenzana-Cordon*, *supra*, 141 F. Supp. 3d at 39–40. The D.C. Circuit Court of Appeals in *Bowie* stated: “[W]e are confident that there is no general ‘complete the story’ or ‘explain the circumstances’ exception to Rule 404(b) in this Circuit. Such broad exclusions have no discernible grounding in the ‘other crimes, wrongs, or acts’ language of the rule. Rule 404(b), and particularly its notice requirement, should not be disregarded on such a flimsy basis.” *Bowie*, *supra*, 232 F.3d at 929. This Court should grant this Petition for Writ of Certiorari in order to resolve the conflict between the precedent of the D.C. Circuit Court of Appeals and many of the other Circuit Courts of Appeal with respect to the intrinsic evidence rule.

CONCLUSION

The decision by the Supreme Court of Georgia allowing the admission of irrelevant, prejudicial and remote evidence by labeling it as intrinsic to the case violated Petitioner's right to due process and to a fair trial. This decision was in conflict with the D.C. Circuit Court of Appeals and warrants this Court granting the Petition for Writ of Certiorari pursuant to Supreme Court Rule 10(b). Additionally, the precedent of the D.C. Circuit Court of Appeals is in conflict with other Circuit Courts of Appeal.

For all of the reasons stated above, Petitioner respectfully requests that the Court grant the Petition for Writ of Certiorari in this case in order to review the judgment of the Supreme Court of Georgia.

Respectfully submitted,

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