IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

STATE OF MISSOURI,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 16CR03006321-02
	)	
KEITH CARNES,	)	Division 13
	)	
Defendant.	)	

Suggestions in Opposition to Motion for New Trial

The State of Missouri hereby requests that this Court deny the motion for new trial filed in this cause because it is untimely, because this Court's jurisdiction over this case has expired, and because the claims are meritless.

Procedural Background

On October 6, 2003, two or more individuals chased after Larry White. At least one of these individuals shot at Larry White. The chase ended in the Fish Town parking lot at 2831 Prospect in Kansas City, Missouri. Witnesses identified Keith Carnes as the person who shot at White. On October 15, 2003, the State filed a complaint charging Mr. Carnes with murder in the first degree and armed criminal action. On October 17, 2003, a grand jury indicted Mr. Carnes on the same charges.

The first trial setting, October 24, 2004, was continued for a month on the State's motion in order to find essential eye witnesses. Those witnesses

did not appear for trial in November 2004. The State's next continuance request was denied. The State dismissed the case and refiled the charges.

The first trial began April 18, 2005 before Senior Judge William Mauer. It ended in a guilty verdict from the jury. The State was represented at trial by Assistant Prosecuting Attorneys Dawn Parsons and Brady Twenter. Mr. Carnes was represented by Willis Toney. Prior to sentencing, on defense counsel's motion, the trial court set aside that verdict and granted a new trial.[1]

Before the second trial, Mr. Carnes waived his right to a jury trial. Following a bench trial, in November 2005, Judge Gene Martin found Mr. Carnes guilty of murder in the first degree and guilty of armed criminal action. In March 2006, Judge Martin sentenced Mr. Carnes to concurrent life sentences to be served without parole or conditional release on the sentence for murder in the first degree.

After being granted leave to file an appeal out of time, Mr. Carnes filed his notice of appeal in September 2006. In January 2008, this Court received the mandate from the Missouri Court of Appeals affirming the judgment and

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[1] Witness Wendy Lockett was located only shortly after the jury was picked in the first trial. Defendant requested a continuance, but Judge Mauer denied it. Following the jury's conviction, the judge changed his mind and granted the new trial due to the witness timing issues.

sentence. *See State v. Carnes,* 241 S.W.3d 344 (Mo. App. W.D. 2007) (finding that the evidence was sufficient and rejecting a claim of improper evidence).

In February 2008, Mr. Carnes filed for relief under Rule 29.15. After counsel filed an amended motion, this Court conducted a hearing on that amended motion. In July 2010, this Court denied the amended post-conviction motion. Mr. Carnes then appealed the denial of his post-conviction claims. In May 2012, this Court received the mandate from the Missouri Court of Appeals affirming the denial of post-conviction relief. *See Carnes v. State,* 363 S.W.3d 45 (Mo. App. W.D. 2011).

On November 16, 2016, Mr. Carnes filed the present motion.

Analysis

I. The present motion is untimely and does not confer authority upon this Court to grant the requested relief.

This motion is untimely and a nullity for several reasons.

First, a trial court's authority over a specific case is limited.[2] In most cases, that authority ends when a judgment is entered. *See State ex rel. Zahnd v. Shafer,* 276 S.W.3d 368, 371 (Mo. App. W.D. 2009) (judgment is

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[2] In older cases, this authority is often referred to as jurisdiction. Given that this Court has subject matter jurisdiction over criminal cases and personal jurisdiction over the parties, the reference to jurisdiction may not be accurate. However, the gist of these cases is still accurate – namely that a court only has the authority to exercise jurisdiction while a case is still pending.

final when sentence imposed). Once a trial court has entered judgment, it may only exercise further authority – such as probation supervision or reduction of sentence – if that authority is granted by a statute or a rule. *State ex rel. Goldesberry v. Taylor,* 233 S.W.3d 796, 798 (Mo. App. W.D. 2007). As such, this Court's general authority to entertain motions for relief in this case ended when it imposed sentence in March 2006.

Second, Mr. Carnes filed a notice of appeal from this Court's decision. With limited exceptions, once a party files an appeal, authority over the case is transferred from the trial court to the appellate courts. When an appellate court affirms a final decision of the trial court, the trial court's continued authority over the case is generally limited to those orders necessary to carry out and execute the original judgment.[3] *Vanderford v. Cameron Mut. Ins. Co.,* 915 S.W.2d 391, 392-93 (Mo. App. W.D. 1996). Even when a case is reversed in whole or in part, the scope of the trial court's authority on remand is defined by the mandate. A trial court may not grant a new motion for new trial filed after the remand (unless such a motion is within the scope of the remand). *State v. Doss,* 2016 Mo. Lexis 1113 (Mo. App. W.D. November 1, 2016). As such, absent the Missouri Court of Appeals setting aside its

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[3] For example, if Mr. Carnes was on probation and his conviction was affirmed, the trial court would still have the authority to continue to supervise the probation. Similarly, the trial court would have authority to enter process in aid of the execution of the judgment for court costs.

mandate and remanding for a specific further proceeding, the current authority to take action on this case lies with the Missouri Court of Appeals.

Third, while certain rules and statutes create exceptions to the above two general principles, none of the rules or cases cited by Mr. Carnes create an exception that would authorize this Court to address this motion or permit Mr. Carnes to files this motion at this late date. He has suggested four separate sources of continued authority for this Court to grant the motion. None of these sources actually grants this Court the authority he suggests.

The first potential source is *State v. Terry,* 304 S.W.3d 105 (Mo. 2010). *Terry* concerned an appellate court's ability to grant relief for newly discovered evidence discovered after the time for filing a motion for new trial had expired (or not included in the motion for new trial). *Id.* at 108-11. In *Terry,* the Missouri Supreme Court noted that there was no authority in the rules to file a motion for new trial based on newly discovered evidence after the expiration of time for filing a motion for new trial. *Id.* at 108-09. Notwithstanding this lack of express authorization, the Missouri Supreme Court held that "an appellate court has the inherent power to prevent miscarriages of justice," and that the appellate court could exercise that power to remand a case to the trial court for a hearing on such newly discovered evidence. *Id.* at 110. In this case, as noted above, no appellate

court has exercised that inherent authority, and *Terry* does not recognize any authority in the trial court to hear such untimely claims.

The second alleged authority is *State v. Coffman,* 647 S.W.2d 849 (Mo. App. W.D. 1983). *Coffman* concerned whether a trial court could, prior to sentencing, grant a new trial if it found that a witness had committed perjury even if the claim of perjury was first raised after the time for filing a motion for new trial. *Id.* at 851. In particular, the Western District found that such relief was authorized by Rule 29.13(b) which permits a court, with the consent of the defendant, to order a new trial on its own motion prior to sentencing. As such, *Coffman* does not support any assertion that a trial court retains authority after sentencing to consider claims of perjury.

The third alleged authority is Rule 29.11. Rule 29.11 authorizes a trial court to grant a new trial for good cause shown (which would include a new trial based on newly-discovered evidence). Rule 29.11(a). However, Rule 29.11 requires the filing of a motion for new trial within twenty-five days (assuming the maximum extension is granted) of the finding of guilt. Rule 29.11(b). Further, other language in the rule makes it clear that the power to grant a new trial under Rule 29.11 is a pre-sentencing power. *See, e.g.,* Rule 29.11(c) (a court may not impose sentence until the time for filing a motion for new trial has expired and any motion for new trial has been overruled).

The last source of authority proffered by defendant is Rule 29.12. While Mr. Carnes does not specify which part of Rule 29.12 applies to his case, the only part that would arguably apply is Rule 29.12(b) covering plain error. Rule 29.12, however, does not authorize an independent post-sentencing motion for relief. *Harris v. State,* 48 S.W.3d 71, 71-73 (Mo. App. W.D. 2001).

Just recently, the Missouri Court of Appeals addressed the relationship between *Terry* and Rule 29.11. *See State v. Williams,* 2016 Mo. App. Lexis 1212 (Mo. App. W.D. November 22, 2016). In *Williams,* the Missouri Court of Appeals had set aside the sentence on the first appeal and remanded for a new sentencing hearing.[4] *Id.* at *4. On remand, the defendant filed a motion for new trial asserting the existence of newly discovered evidence. *Id.* at 4-5. The Western District held that the time limits contained in Rule 29.11 – requiring that a motion for new trial be filed within twenty-five days of the verdict – were mandatory and that there were no provisions of Missouri law authorizing the filing of an untimely motion for new trial in the trial court. *Id.* at *6-*7. Once the time for filing a motion for new trial has expired, the granting of a motion for new trial – under the authority recognized in *Terry* – is a matter of the appellate court's discretion upon a finding of manifest

[4] In *Williams,* the defendant had not challenged the finding of guilt on direct appeal. *State v. Williams,* 465 S.W.3d 516 (Mo. App. W.D. 2015).

injustice under the appellate court's authority to review for plain error. *Id.* at *7-*9.

Contrary to Mr. Carnes's claims, nothing in *Terry, Coffman,* Rule 29.11, or Rule 29.12 permits a defendant to file new claims for relief in the trial court after the direct appeal. As *Harris* noted, after a defendant has been sentenced and committed to the Department of Corrections, the sole authorized motion in the trial court is a motion under Rule 24.035 or Rule 29.15. 48 S.W.3d at 72. And as the Missouri Supreme Court has noted, once the time for filing a proper motion in the trial court – either a motion for new trial or a post-conviction motion has expired – the sole potential remedy is by writ of habeas corpus, but only if the person can meet one of the limited exceptions allowing the raising of an untimely claim. *State ex rel. Clemmons v. Larkins,* 475 S.W.3d 60, 76 (Mo. 2015); *Brown v. State,* 66 S.W.3d 721, 725-31 (Mo. 2002); *State ex rel. Nixon v. Jaynes,* 63 S.W.3d 210, 214-18 (Mo. 2001); *see also Ferguson v. State,* 325 S.W.3d 400, 406 (Mo. App. W.D. 2010) (proper forum for presenting new evidence discovered during post-conviction case was a habeas petition or a request for clemency).

Mr. Carnes suggests that he is entitled to choose this forum for relief because his claims are not cognizable in a habeas petition. There are two problems with this claim. First, *Lincoln v. Cassady,* 2016 Mo. App. Lexis 1006 (Mo. App. W.D. October 11, 2016), does not bar all forms of habeas relief

for a criminal defendant.[5] Instead, it simply declines to recognize an exception to the procedural bar for a free-standing claim of actual innocence in a non-capital case. *Id.* at *20-*25. If Mr. Carnes could reach a recognized exception – such as cause and prejudice or a gateway claim of actual innocence – he might be able to raise his claim of perjury in a habeas petition.[6] *Cf. id.* at *6-*8. The real problem for Mr. Carnes in this case is that his evidence is insufficient to meet either the cause and prejudice or gateway actual innocence prerequisites to review of his merits claim of perjury. But the fact that he is unlikely to meet his burden of proof in a habeas petition does not mean that this Court has authority to grant relief.

Second, there is no right to have Missouri create additional forums in which to raise claims when the time has expired to properly raise those claims and the claims raised are insufficient to entitle him to relief under the recognized procedures. As the Missouri Supreme Court has stated, the authorized avenues for raising claims were "not designed for duplicative and

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[5] Additionally, *Lincoln* is not yet a final opinion. According to Casenet, on December 7, Mr. Lincoln filed for transfer to the Missouri Supreme Court under Case Number SC96083. By contrast, according to Casenet, the mandates have issued in *Williams* and *Doss,* and they are final opinions.
[6] In fact, the Missouri Supreme Court recently issued a show cause order in *State ex rel. Robinson v. Cassady*, Case Number SC95892. Based on the documents on Casenet, Mr. Robinson appears to raise the same type of claims in his habeas petition that Mr. Carnes is trying to raise in his untimely and unauthorized motion for new trial.

unending challenges to the finality of judgment." *State ex rel. Simmons v. White,* 866 S.W.2d 443, 446 (Mo. 1993). "A person who has suffered criminal conviction is bound to raise all challenges thereto timely and in accordance with the procedures established for that purpose. *To allow otherwise* would result in a chaos of review unlimited in time, scope, and expense." *Id.* (emphasis added.) As the United States Supreme Court has noted, the essence of habeas review is "to ensure that individuals are not incarcerated in violation of the Constitution – not to correct errors of fact." *Herrera v. Collins,* 506 U.S. 390, 400 (1993) (declining to recognize a free-standing claim of actual innocence in a federal habeas petition). As the United States Supreme Court explained, the right to a new trial based on new evidence does not have long-standing historical roots and states have the right to impose reasonable time limits requiring that such claims be raised in close proximity to the trial. *Id.* at 408-11. To the extent that state or federal law provides no judicial forum for raising this type of claim at this time, the traditional avenue for relief is not a judicial remedy but rather the exercise of executive clemency. *Id.* at 411-16.

In summary, this Court's authority over this case expired when first the direct appeal and then the post-conviction appeals were affirmed by the Missouri Court of Appeals. None of the cases or rules cited by Mr. Carnes recognize any authority for the trial court to consider an untimely motion for

new trial after sentencing. While Mr. Carnes may correctly believe that a habeas court will find that he does not have a valid claim for relief, a state habeas petition is the only authorized remedy under state law at this date and time. The fact that a habeas petition might be legally frivolous does not make this motion meritorious. This Court should dismiss this motion.

II. Even if this Court could consider this type of claim on the merits, the petitioner's claims are legally insubstantial.

Post-conviction review of claims of actual innocence begin from the starting point that the original trial – whether to a judge or to a jury – is a decisive event in determining the guilt or innocence of the defendant. *Herrera,* 506 U.S. at 401. Once a defendant has been found guilty, the presumption of innocence disappears, and, in the eyes of the law, the defendant becomes a guilty person. *Id.* at 399-400.

In considering claims of actual innocence, courts must remember that, as the United States Supreme Court explained in *Herrera,* when a new trial is granted in a belated fashion, "the erosion of memory and dispersion of witnesses that occur with the passage of time" hinders the ability of a new trial to render a "reliable criminal adjudication." 506 U.S. at 403-04. As the United States Supreme Court recognized in *Herrera,* the passage of time since the original trial and the ease with which such affidavits can be obtained and abused factors against giving such affidavits significant weight.

Id. at 417-18. Similarly, in *Schlup v. Delo,* 513 U.S. 298 (1995), the United States Supreme Court emphasized that new evidence must be reliable such as "trustworthy eyewitness accounts." *Id.* at 324.

Both in the context of claims of actual innocence and claims of "newly discovered evidence" on direct appeal, Missouri courts have held that the defense team must not have known about the evidence at the time of trial and could not have discovered and presented the evidence through the exercise of due diligence. *Terry,* 304 S.W.3d at 109 (first two prongs of claim of newly discovered evidence are that the defense is unaware of evidence at time of trial and that the defense would not have discovered evidence through exercise of due diligence); *State ex rel. Nixon v. Sheffield,* 272 S.W.3d 277, 284-85 (Mo. App. S.D. 2008) (on actual innocence claim, evidence must have been unavailable at trial and could not have been discovered through due diligence). The Eighth Circuit has emphasized that evidence that was not introduced at trial due to the alleged incompetence of trial counsel to use due diligence to discover and introduce that evidence does not qualify as new evidence. *Osborne v. Purkett,* 411 F.3d 911, 920 (8th Cir. 2005).

In support of this motion, Mr. Carnes has attached fifteen exhibits. These exhibits fall into four categories.

In the first category is Exhibit 1 -- a newspaper story summarizing the allegations of Mr. Carnes and his supporters. The information in this story is

not evidence and does not demonstrate that any of the items mentioned within it could not have been discovered by the exercise of due diligence.

In the second category are items that either would have been actually available at the time of trial or refer to information that would have been available at the time of trial. Exhibit 4 and Exhibit 5 are police reports regarding the prior statements of Lorraine Morrow and Wendy Lockett who testified at trial. Exhibit 6 is a letter from the medical examiner who testified in this case expressing that, in hindsight, he did not adequately explain his findings at trial. Exhibit 8 is an affidavit from Vernita Bell who did testify at trial. In announcing his finding of guilt, Judge Martin stated that Ms. Bell was not credible, and nothing in the current affidavit offers any reason to believe that Ms. Bell has somehow become credible. Exhibit 13 is a police report from Detective Robert Blehm who testified at trial. To the extent that trial counsel failed to properly cross-examine Ms. Morrow and the medical examiner or examine Ms. Bell to bring out all exculpatory evidence, such a claim is not a claim of newly-discovered evidence but rather a claim of ineffective assistance of counsel which had to be raised in his Rule 29.15 motion.

In the third category are items related to witnesses who did not testify at trial. Three of the exhibits concern claims that were litigated in Mr. Carnes's post-conviction case. Exhibit 7 is a copy of the deposition of the

expert that trial counsel considered hiring but did not call at trial. Exhibit 14 is the affidavit of Margo Thomas, and Exhibit 15 is a copy of the police report on Ms. Thomas's statement. This Court has previously rejected the claim that counsel was ineffective for not calling the expert or Ms. Thomas to testify at trial.

Similarly, four of the exhibits are affidavits from people who lived in the community at the time of the offense or had connections to the community – Exhibit 9, Exhibit 10, Exhibit 11, and Exhibit 12. Exhibit 9 and Exhibit 10 demonstrate that Mr. Carnes should have been aware of the two witnesses who were interviewed by the police and that Carnes could have called these witnesses through the exercise of due diligence. For the two witnesses who did not talk to the police (Exhibit 11 and Exhibit 12), the facts contained in those affidavits demonstrate that a thorough canvass of those living near the crime scene would have led counsel to discover these two individuals as potential witnesses. Any failure of trial counsel to investigate and call these witnesses should have been raised and litigated in his Rule 29.15 motion. Nothing in the current motion suggests or would support a claim of abandonment or permit the filing of a successive post-conviction motion.

The final category of exhibits are affidavits from witnesses who testified on behalf of the State at trial. In Exhibit 2 and Exhibit 3, these

witnesses now claim – thirteen years after the fact – that their testimony was coerced by the initial prosecutor, Amy McGowan.[7] What these statements omit is that, by the time of Mr. Carnes's jury trial and then again with his bench trial in front of Judge Martin, Ms. McGowan was no longer the prosecutor because she had departed Jackson County for a new job in Douglas County, Kansas. From the police reports, Ms. McGowan was not involved in taking the initial statements. In addition, Ms. Lockett's affidavit makes the incredible claim that her memory of events is clearer today than at the time of the offense.[8]

Recantations are not automatically believable. *See Nix v. Whiteside,* 475 U.S. 157, 183 n. 3 (1986) (Blackmun, J., concurring in result). Indeed, as the Missouri Court of Appeals, Eastern District, has noted in denying a *Terry* motion "[r]ecanting testimony is exceedingly unreliable and is regarded with suspicion . . . ." *State v. Manley,* 414 S.W.3d 561, 566 (Mo. App. E.D. 2013).

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[7] Ms. McGowan was the initial prosecutor on the case, although she was replaced by APAs Dawn Parsons and Brady Twenter. Aside from being inconsistent with their trial testimony, these affidavits are also inconsistent with the police reports surrounding the original statements, which do not reflect any involvement by Ms. McGowan in the initial interviews. Exhibit 4; Exhibit 5. In any case, as Ms. McGowan was no longer the prosecutor at the time of trial, any allegation that Ms. McGowan coerced or suborned perjured testimony at trial is refuted by the record.

[8] In her trial testimony, Ms. Lockett stated that she did not use crack cocaine on the day of the homicide and was no longer using crack.

Even when timely made, federal and state courts have long held that – especially when a recantation is involved – motions for a new trial are difficult to win. *See United States v. Grey Bear*, 116 F.3d 349, 350 (8th Cir. 1997). "Motions for new trial based upon the alleged recantation of a material witness should be viewed with disfavor. . . ." *United States v. Coleman*, 460 F.2d 1038, 1040 (8th Cir. 1972). It is easy to understand why this should be so. *Grey Bear*, 116 F.3d at 350. The trial is the main event in the criminal process. *Id.* The witnesses are there, they are sworn, they are subject to cross-examination, and the jury determines whether to believe them. *Id.* The stability and finality of verdicts would be greatly usurped if courts were quick to credit purported revisionist testimony from witnesses who already have testified under oath at trial, subject to cross examination and penalties of perjury, but have since changed their minds, been coerced into recanting, or who otherwise claim to have lied at the trial. *Id.*

Out-of-court subsequent recantations frequently occur for a variety of reasons unrelated to the truth or falsity of the original testimony, including fading memories, pressure to recant by a defendant's friends or relatives, and general remorse for the role a witness's testimony played in achieving the resultant custodial sentence. "New trial motions based on recanted testimony are immediately suspect," *United States v. Provost*, 921 F.2d 163, 165 (8th Cir. 1990) (citing *United States v. Ward*, 544 F.2d 975, 976 (8th Cir.

1976)), because "where a witness makes subsequent statements directly contradicting earlier testimony the witness either is lying now, was lying then, or lied both times." *Id.* (citing *United States v. Bednar*, 776 F.2d 236, 238-39 (8th Cir. 1985)).

During Mr. Carnes's two trials, which were near the time of the underlying events, the witnesses *twice* testified under oath, subject to penalties for perjury, and subject to cross examination, about what they saw. Twice, a guilty verdict was subsequently rendered: first by a petit jury, second by a judge. Now, over a decade later, alleged recantations are offered to this Court concerning two of the State's witnesses. These alleged recantations were not subject to cross examination or penalties for perjury. They are far removed in time from the underlying events. And they are not corroborated by any substantial independent evidence or even a persuasive motive for the alleged perjury. As such, Mr. Carnes's current claims are underwhelming at best. But in any case, judicial comity and finality would be absurdly compromised if such naked, late-produced allegations, standing alone, were sufficient to merit the undoing of a final verdict and sentence. In the bigger picture, that is why the rules mandate that there is no relief in this forum available to Mr. Carnes on these claims.

In part, to bolster the significance of the alleged recantations, Mr. Carnes claims that the testimony of Ms. Morrow and Ms. Lockett was

inconsistent with the physical evidence. However, this Court and the Missouri Court of Appeals have already considered that argument in the context of defendant's post-conviction claim that trial counsel should have called an expert to point out those inconsistencies. In rejecting that claim, the Western District noted that the evidence at trial already demonstrated that the witnesses were probably not accurate in their testimony that the defendant also shot Mr. White while in the parking lot. *Carnes v. State,* Case No. WD72916, mem. op. at 8. The fact that, at a distance, Ms. Morrow and Ms. Lockett could not tell if the defendant shot Mr. White while standing over Mr. White in the parking lot, does not impeach their testimony that, at a substantially closer distance, they recognized the defendant as the person chasing after and shooting at Mr. White. Further, their testimony about the chase was consistent with the physical evidence.

Additionally, Mr. Carnes ignores the prior statement of Ms. Jones who, at the time of trial, claimed not to clearly remember what happened on the night of the shooting. Under Missouri law that statement qualifies as substantive evidence. § 491.074, RSMo. Ms. Jones has never recanted the accuracy of that statement in court on in any pleading filed with the court. Instead, she merely claimed, as of the time of trial, to no longer remember the details of that date.

Latahra Smith brought 71 new allegations to the Kansas City Police Department. She is apparently married to Mr. Carnes and is the person behind the Keith Carnes Freedom Project, or KC Freedom Project. Ms. Smith provided a binder of information to KCPD. KCPD took the allegations seriously and spent approximately six months investigating the claims made by Ms. Smith, including evaluating the alleged recantations and evaluating the original police investigation. KCPD found that Ms. Smith's assertions contain numerous leaps of logic and largely inaccurate and not factual information. KCPD found no indication of malfeasance. KCPD communicated the conclusion of its findings by letter to Ms. Smith on October 19, 2015.

In summary, defendant's allegations are a mix of an attempt to relitigate claims which were raised (or are similar to the claims that were raised) in the post-conviction case and belated alleged recantations that do not deserve any substantial weight. Even if this Court could grant relief, defendant's claims would not merit a hearing.

Conclusion

Missouri law does not permit a defendant to return to the trial court years after his trial to file a motion for new trial. Instead, any claims of newly discovered evidence are properly addressed by a petition for habeas relief (or, if a defendant lacks substantial grounds for a habeas petition, by an

application for clemency). Furthermore, even if this Court could address defendant's allegations, much of the evidence contained in his application was available at the time of trial (or could have been available by the exercise of due diligence) and therefore would not support a motion for new trial even if the motion were timely. The remaining new evidence is not credible under all of the circumstances of this case.

THEREFORE, this Court should deny defendant's untimely motion for new trial.

Respectfully submitted,
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