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SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Chester County

Honorable Brian M. Gibbons, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

BRADLEY MARK CORLEW,

APPELLANT

APPELLATE CASE NO. 2021-000989

RECORD ON APPEAL

SUSAN B. HACKETT
Appellate Defender

ALAN WILSON
Attorney General

South Carolina Commission on Indigent
Defense
Division of Appellate Defense
PO Box 11589
Columbia, SC 29211-1589
(803) 734-1330

DAVID SPENCER
Senior Assistant Attorney General

Rembert Dennis Building
1000 Assembly Street, Room 519
Columbia, SC 29201
(803)734-3689

ATTORNEY FOR APPELLANT

RANDY E. NEWMAN, JR.
Solicitor, Sixth Judicial Circuit

PO Box 607
Lancaster, SC 29721-0607
(803) 416-9336

ATTORNEYS FOR RESPONDENT

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THE FOLLOWING EXHIBITS ARE ON FILE WITH THIS COURT:

State’s Exhibit #1 (interview of Minor 1); State’s Exhibit #2 (interview of Minor 2); State’s Exhibit #4 (phone dump); State’s Exhibit #6 (flash drive; contains defendant’s statements to law enforcement); State’s Exhibit #20 (questionnaire); State’s Exhibit #27 (photo); State’s Exhibit #28 (photo); State’s Exhibit #29 (photo); State’s Exhibit #30 (photo); and State’s Exhibit #31 (photo).

STATE OF SOUTH CAROLINA - COUNTY OF CHESTER
SIXTH JUDICIAL CIRCUIT

STATE OF SOUTH CAROLINA)
) Docket No.
Plaintiff,) 2019-GS-12-887
)
)
V.)
)
)
) PRETRIAL MOTIONS
BRADLEY CORLEW)
)
)
Defendant)

August 11, 2021
Chester, South Carolina

B-E-F-O-R-E:

THE HONORABLE BRIAN M. GIBBONS

A-P-P-E-A-R-A-N-C-E-S:

CANDICE LIVELY, ESQ.
Attorney for the State of South Carolina

WILLIAM FRICK, ESQ.
Attorney for the Defendant

JEFFREY DUNN, ESQ.
Attorney for the Codefendant

Maria DiScioscia, RPR
Official Court Reporter

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1 MR. DUNN: There is no evaluation records.
2 There's a conversation between myself and the doctor.
3 Your Honor, I don't think that whatever that
4 conversation is is protected under HIPAA. I think the
5 evaluation is protected under HIPAA and that asking a
6 doctor to then come testify or try to create a report
7 would be a violation of the HIPAA. And quite frankly,
8 I'm not sure that the doctor would even be comfortable
9 doing that for the medical reasons.

10 THE COURT: Yeah. Mr. Frick, I don't know if
11 I can order a doctor to do a report. I mean, certainly,
12 I can order a doctor to come testify but the doctor can
13 invoke whatever privilege the doctor wants to invoke.
14 But I'm not sure I can order somebody to put something
15 down in writing and then for me to determine whether or
16 not it's exculpatory and then for me to determine
17 whether or not you have access to it. You can certainly
18 cross-examine the doctor or call the doctor as a witness
19 if you wish to do that.

20 MR. FRICK: I understand. In reviewing the
21 situation, I have no case law to support what I have
22 because it seems to be a unique issue and as the
23 *Blackwell* case and everything that goes along with it
24 talks about -- everything specifically says "records."
25 And I'm kind of in that conundrum, too, of: Can a

1 record be ordered to be created? And I'm a at loss
2 quiet frankly.

3 THE COURT: Well, I make a finding that I
4 can't order that --

5 MR. FRICK: Okay.

6 THE COURT: -- you know, so you're protected
7 in the record. So that motions denied.

8 Going back to the motion to exclude the child
9 counselor records. Just for the purpose of this record,
10 that motion by the State is granted in part but denied
11 as to the bulk of the records. Just so we're all clear
12 on where we are.

13 MS. LIVELY: Yes, sir. I understood that.
14 But thank you for clearing that up on the record.

15 THE COURT: All right. So what's the next
16 motion to deal with?

17 MS. LIVELY: The State filed a res gestae,
18 common scheme or plan motion, as well as the defense
19 filed its motion for Jackson v Denno on two statements
20 made by the defendant including a handwritten statement,
21 as well as motion to quash indictments by defense.

22 THE COURT: Let's deal with one at time.

23 MS. LIVELY: Yes.

24 THE COURT: Let's deal with your res gestae,
25 common scheme or plan motion.

1 MS. LIVELY: Yes, sir, and If I may approach?

2 What I did to try to make it simpler was make
3 copies of the cases that are referenced in my motion and
4 I also have copies of the information regarding my
5 motion to amend the indictment, your Honor.

6 THE COURT: All right.

7 MS. LIVELY: And I've given the defense copies
8 of that.

9 THE COURT: All right.

10 MS. LIVELY: Thank you, your Honor. In
11 regards to the res gestae, common scheme or plan. I
12 actually even kind of hesitated to even file this
13 motion, but in an abundance of caution, I felt that I
14 should and bring all of it to the Court's attention in
15 order for us to have good clean slate whenever we go
16 into the courtroom. This case is just so multilayered
17 in regards to the type of abuse that was actually
18 suffered by all the children.

19 Your Honor, this was a situation where nine
20 children where living in the home along with the
21 defendant, Sarah Lacy, who had four of her own
22 biological children, then Bradley Corlew who have five
23 of his biological children. What ended up happening
24 was, when they moved to the Ella Street, E-L-L-A, in the
25 City of Chester, street house, it very clearly became a

1 sort of lifestyle to normalize sexual behaviors between
2 both of the defendants and their sexual activities, as
3 well as having the children join in on the sexual
4 activities as well.

5 So is this really a res gestae situation?
6 Clearly, this is something that the State would be
7 very -- it would tie our hands and be almost impossible
8 to divvy out the type of abuse that was going on with
9 each individual child because they were often. It was
10 all going on together. They were actually, your Honor,
11 material witnesses to the abuse that was being conducted
12 on one another. Typically sexual abuse happens in
13 private so we don't have that opportunity to say: This
14 child also witnessed the other child being sexual abused
15 by the defendant.

16 So what we have is a very unique situation.
17 That's why I said I hesitated to even call it res gestae
18 except that we do have, obviously, a lifestyle
19 normalizing sexual behavior that was going on that would
20 make it a -- it would really fracture the case for the
21 State if we had to just specifically talk about one
22 victim at a time. And the defense will know from having
23 looked at forensic interviews that clearly these
24 children were being abused in the presence of one
25 another. That was part of normalization of that

1 particular lifestyle that they choose to have with their
2 children. And I put all of that in my motion, your
3 Honor, because if you look at *State v Perry* and *State*
4 *versus Durant*. Clearly what *Perry* is looking at is, we
5 don't want to say that they're similar as in this person
6 preferentially liked a ten year old with blonde hair who
7 was living in his house and he liked to perform oral
8 sex. And he did the same thing to another ten year old
9 with blonde hair and same thing to another ten year old
10 with blonde hair. We don't have that. So what we have
11 clearly is the logical connection between the events of
12 sexual abuse that was going on between the children at
13 the hands of these defendants and they were also
14 material witnesses to one another's abuse.

15 So it clearly is one of these particularized
16 situations that is very unique, very specific by the
17 defendant, Corlew, and defendant, Lacy, in regards to
18 how these children were systematically abused on a daily
19 basis. So I'm bringing it to the Court's attention.

20 I don't necessarily think that it even gets
21 into necessarily a common scheme or plan because they
22 materially witnessed each other's abuse. But for the
23 purposes of Court to understand, this is what's going to
24 come out of the testimony, as well as forensic
25 interviews that the State is asking not be, you know,

1 blocked in any way, shape, or form as to what these kids
2 are going to testify too. Two victims are going to
3 testify to in regards to how they were victimized.

4 THE COURT: All right. Thank you.

5 Mr. Frick?

6 MR. FRICK: Your Honor, in looking at -- and I
7 know she just touched on the res gestae stuff, but it's
8 always been my contention that res gestae is nothing but
9 a back doorway to get to 404(b), which gets us to common
10 scheme or plan, which I believe is what they're really
11 talking about in this situation.

12 The State mentioned *Perry* case, which I
13 believe the Court has. And of course, in the *Perry* case
14 that came out last year, somewhere last year or so.
15 They said it's got to be -- similarity is not enough.
16 But that's all we got here is similarity. There's got
17 to be a logical connection and then it's still got to go
18 through the 403 analysis like everything else to
19 determine whether it is too prejudicial. Obviously, any
20 of it's going to be prejudicial but is it more
21 prejudicial than the probative value.

22 And Judge, looking at the rules of evidence,
23 I'm concerned. And the reason why I'm so concerned and
24 know this rule so well is because I screwed it up when I
25 was a solicitor a long time ago, is 801(d)1(d), which

1 says: "That a statement," that's obviously the hearsay,
2 that says under that Rule 801(d)1(d), "A statement that
3 is consistent with the declarants testimony in a
4 criminal sexual conduct case or attempted criminal
5 sexual conduct case where declarant is the alleged
6 victim and the statement is limited to time and place of
7 the incident."

8 Essentially, what that means is the other kids
9 who are material witnesses to the other kids -- to the
10 victim of each other's case can testify to what they saw
11 but can only testify as to time and place. And as you
12 will see or have seen in the forensic interviews and I'm
13 sure will come out in the testimony, they're going to
14 talk about what was done, which is not allowed by the
15 rule or allegations of what was done or what they talked
16 about. And I'm very concerned that there is, by
17 combining both of these cases, that we'll clearly
18 violate that right and I don't know how you stop it from
19 happening particularly and this bleeds into the forensic
20 interview part particularly as it comes in with forensic
21 interviews because the children are talking about what's
22 going on with them and the other children.

23 So short of just separating each of the cases,
24 having to do them separately and then redacting the
25 video if it's admitted, I don't know how we don't. One,

1 I don't know how it satisfies more than just this
2 similarities and not having the logical connection. It
3 is certainly problematic under 403, I believe, as being
4 former prejudicial in the probative value. And then, of
5 course, my big issue is going to be with the rule -- the
6 hearsay rule that strictly prohibits what a witness can
7 say in a CSC case.

8 THE COURT: What's the hearsay rule again, 801
9 what?

10 MR. FRICK: 801, little (d)(1), big (D).

11 THE COURT: Okay. Thank you.

12 Madam Solicitor, your reply?

13 MS. LIVELY: Yes, sir. I used to actually
14 have the benefit of training on that particular hearsay
15 section. What that -- the whole point of that hearsay
16 section is -- especially like with forensic
17 interviewers, law enforcement, whenever the victim
18 discloses what happened, the victim has to testify and
19 no one else can get up there and say, "she told me
20 this." All they can say is time and place.

21 So for jurisdictional purposes or just even a
22 temporal basis of the charge, that would be all they can
23 testify to. We don't have to worry about that here
24 because when Minor 2 was being sexually abuse, Minor 1 was
25 being sexually abused. They were always -- it was --

1 that's how this whole family dynamic took place, is that
2 they were always in the same room. The other children
3 were watching and they would have sex with one another,
4 "they" being the defendants. They would then have the
5 children join in, especially Minor 1 and Minor 2. who even
6 in the forensic interviews, which your Honors going to
7 have the benefit of having watched, you're going to hear
8 them talk about that. So that's the reason why that
9 does not fit that hearsay concern because these -- both
10 of these children experienced and personally witnessed
11 what the defendant was doing to each of them.

12 THE COURT: And can testify about that
13 personally?

14 MS. LIVELY: Yes, sir. They can testify about
15 what they saw. So that's the reason why that exception
16 does keep that information from being admissible.

17 THE COURT: Mr. Frick, anything else on that
18 issue?

19 MR. FRICK: Your Honor, I would just -- that
20 it didn't always occur at the same time. That's part of
21 the issue I've got with that. So trying to parse that
22 out, I don't know how you're going to do it, if you try
23 to put both of them together.

24 THE COURT: All right. Thank you. I'll take
25 that matter under advisement and I will rule next week

1 when we get together again for other pretrial issues.

2 The next motion is what?

3 MS. LIVELY: Your Honor, he's filed a motion
4 for a quash --

5 THE COURT: I have something called
6 "indictments." What's that?

7 MS. LIVELY: That's the research I have for
8 the indictments. He filed a motion to quash the
9 indictments, your Honor. So it would probably be easier
10 if he --

11 THE COURT: You want to deal with his motion
12 that has to do with that first?

13 MR. LIVELY: -- goes forward with his first.
14 And then I filed a motion today in regards to being
15 allowed to amend so -- which that will be a segue into
16 mine.

17 THE COURT: Are you okay to hear her motion to
18 amend today or you want to put that off until next week?

19 MR. FRICK: I mean, no, I'm fine with going
20 ahead and doing it today.

21 THE COURT: So we're going to deal with
22 defendant's motion to quash indictment. And do you have
23 a written copy of that by chance?

24 MR. FRICK: The motion?

25 THE COURT: Yes. I thought I had it, but I

1 Number 3: The motion for res gestae, common
2 scheme or plan evidence. That motion has been taken
3 under advisement. I will rule on that next Wednesday.

4 Next motion is motion to quash the indictment,
5 counts of the indictment. I've granted the defense
6 motion on that. And in conjunction with that, I've
7 granted the State's motion to amend the indictment.
8 Then I just denied the defense's motion to keep out any
9 alleged statement made by the defense.

10 Okay. That's it. Recess until next Wednesday
11 at 2:00 p.m. in Lancaster. Thank you.

12 MS. LIVELY: Thank you, your Honor.

13 MR. FRICK: Thank you, your Honor.

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1 STATE OF SOUTH CAROLINA
2 COURT OF GENERAL SESSIONS
3 COUNTY OF CHESTER
4 2019-GS-12-00887, 00954; 2020-GS-12-00974
5 State of South Carolina
6 Vs.
7 Bradley Corlew
8
9 Lancaster, South Carolina
10 August 18, 2021
11 Before the Honorable Brian M. Gibbons
12 APPEARANCES
13 For the State: Candice Lively
14 For the Defendant: William Frick
15
16 Reported by: Michael C. Watkins
17 Official Court Reporter
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1 MS. LIVELY: State of South Carolina versus Bradley
2 Corlew. There are multiple indictments, however I'm just
3 going to put the -- just the 2019-GS-12-887 indictment.
4 These all involve criminal sexual conduct with a minor first
5 degree, and criminal sexual conduct with a minor second
6 degree, and there's also a direct indictment of incest.
7 Your Honor, today we are handling the pretrial motion which
8 is the request by the State for the admission of forensic
9 interviews that were conducted on the two minor victims in
10 this case at Palmetto CASA back in 2019. The State filed a
11 motion for the Court to review those videos, there are
12 actually three. Two of them were from a victim by the name
13 of Minor 1 she was interviewed on September 12th,
14 2019, and then she had a follow-up interview on
15 September 25th, 2019. Margo Dixon handled both of those.
16 There's also the minor child, Minor 2 who was
17 interviewed on September 12th of 2019. Your Honor should
18 have had all three of those, two of them for Minor 1
19 was on the one zip drive, and Minor 2 was on the
20 separate zip drive. I put their names on them, Your Honor,
21 and they were in an envelope that was provided to your
22 office I guess maybe a week and a half ago.

23 THE COURT: And for the record I have reviewed those
24 videos along with those statements made by the children in
25 question. And Mr. Court Reporter, I'm going to hand these

1 to you and have these marked as Court's Exhibit 1 for the
2 purpose of this hearing, and then we'll -- just to keep a
3 good record. Now, before we go any further I did take one
4 matter under advisement from last week and I want to go
5 ahead and deal with that, that was the State's motion in
6 limine regarding admission of res gestae evidence or common
7 scheme or plan evidence. Do y'all -- either done of you
8 wish to be heard further on that?

9 MS. LIVELY: Your Honor, I submitted all of the
10 research that the State provided and had pulled in regards
11 to the res gestae, and I just wanted to remind Your Honor,
12 I'm assuming you're ready to actually make a ruling on that.
13 If Your Honor were to rule against the State my concern once
14 again would be the inability for me to actually present a
15 full picture to the jury because of the fact that the
16 children were material witnesses to one another's abuse, so
17 I would really under the circumstances believe that it
18 should come in. I think very clearly under Perry and the
19 most recent cases that there is that logical connection that
20 would -- it would meet the requirement of clear and
21 convincing evidence that that information should be allowed
22 in. But, Your Honor, that still is the position of the
23 State because it will be very difficult for us to present
24 that to a jury without it.

25 THE COURT: Mr. Frick, any further arguments on this

1 issue?

2 MR. FRICK: Nothing additional than what was stated
3 previously.

4 THE COURT: All right. I'm going to allow the evidence
5 in over the defense's position, you're protected in the
6 record, Mr. Frick. You know, if this matter does go to
7 trial obviously you can make your contemporaneous objection
8 without having to stand up every single time something is
9 said. I mean, you're protected in the record right now.
10 I'm allowing the State to go into that to establish that
11 what they call a common scheme and plan, but certainly
12 you're entitled to an objection as to under a 403 analysis
13 whether it's substantially more probative than prejudicial,
14 and, you know, you can simply do that at trial by just
15 noting your objection for the record to protect your client.

16 MR. FRICK: Yes, sir. Thank you.

17 THE COURT: All right. Thank you. All right. That
18 brings us to the issue today, which is a motion for
19 admission of out of court statements by a child pursuant to
20 SC code section 17-23-175. Madam Solicitor, I'll turn it
21 over to you.

22 MS. LIVELY: Yes, sir. Thank you, Your Honor. The
23 State would call Margo Dixon to the stand.

24 The witness, MARGO DIXON, was first duly sworn and

25 Testified as follows:

1 DIRECT EXAMINATION

2 BY MS. LIVELY:

3 Q Ms. Dixon, please state your full name for the record
4 as well as where you are currently employed.

5 A Margo Bernadette Dixon. I'm employed with Palmetto
6 Citizens Against Sexual Assault Children's Advocacy Center.

7 Q And is your occupation at -- I'm going to call it
8 PCASA, is that what it's normally called?

9 A Correct.

10 Q What is your position there?

11 A I'm the CAC director as well as the lead forensic
12 interviewer.

13 Q How long have you been in what's referred to as a
14 forensic interviewer, Ms. Dixon?

15 A Twenty-one years.

16 Q Would you say you've done hundreds or up to thousands
17 of forensic interviews?

18 A Well, over thousands.

19 Q Okay. Now, Ms. Dixon, you said you've been doing this
20 for 21 years. So whenever you conduct what's referred to as
21 a forensic interview, do you have specialized training in
22 that field?

23 A I do.

24 Q All right. Tell the Court, what is your specialized
25 training and how often you update that training.

1 A I was initially trained through Child First training,
2 which is a protocol that's used throughout the states. And
3 in that training we have -- it's used in 19 states and two
4 countries. And in that training we are taught that we don't
5 basically lead the child. We allow the child to use their
6 own verbiage when interviewing them and talking to them
7 about what took place during the interview.

8 Q Okay. And in conducting those type of interviews, what
9 is the focus -- and when you said getting them to respond
10 and not use leading questions, but what is your focus in
11 going into this interview to allow the child to do?

12 A We have protocols. We have standards and steps that we
13 have to take as far as building that rapport with them,
14 making sure that they're comfortable, learning their
15 language, they're verbiage, what they like. We have rules
16 within the interview room that we have to abide by, both the
17 child as well as myself.

18 Q And do you actually go through the rules that you
19 expect the child to follow at the beginning of the
20 interview?

21 A I do.

22 Q Do you also let the children know or the child know
23 that the interview is being recorded?

24 A Yes.

25 Q Is anyone sitting in the interview room with you other

1 than the child when you conduct the interview?

2 A Just the two of us.

3 Q Is that a part of the recommendations and the best
4 practices in conducting a forensic interview?

5 A Correct.

6 Q All right. Now, when you conduct a forensic interview,
7 do you -- sometimes does the type of questions you ask
8 depend on the age of the child?

9 A Yes, based on the child's developmental stage.

10 Q Okay. And do you determine that in the first part of
11 the interview when you're actually gaining rapport with the
12 child?

13 A We do.

14 Q And during that process if there is a concern about
15 whether the child may have some developmental delays or
16 issues like that, are you trained to actually deal with
17 those issues?

18 A Yes, we are.

19 Q And if you had specific training as to a child who may
20 have some delayed -- I won't say delayed disclosure, that's
21 not what I meant, some delayed response or maybe some
22 incapacities emotionally and mentally?

23 A Yes.

24 Q Now, whenever you conduct these interviews, you've
25 already said they were recorded, do you have an age limit as

1 to how old a child can be whenever you conduct these
2 interviews?

3 A The youngest child is three and the oldest is 17, 18 if
4 they're like a delayed child.

5 Q If they are a delayed child.

6 A Uh-huh.

7 Q Now, whenever a child comes to you, do you require an
8 intake form and information to provide you with knowledge as
9 to whether that child has possible delays?

10 A Yes, we do.

11 Q Okay. Who refers children to you for forensic
12 interviews?

13 A We take referrals from law enforcement as well as
14 Department of Social Services.

15 Q All right. And so when --

16 THE COURT: Let me interrupt real quick, I forgot to
17 ask this. Mr. Frick, I see your client is not present, do
18 you waive his presence here today for this hearing?

19 MR. FRICK: Yes, sir.

20 THE COURT: And also we're in Lancaster, last week we
21 were in Fairfield and this was all done by consent so we
22 could move forward with this matter for trial and not
23 belabor the actual start of the trial. Do you agree with
24 that?

25 MR. FRICK: I do. And just for the record I did

1 discuss with my client, earlier this week I believe we had a
2 phone call, that this would be taking place in Lancaster
3 today.

4 THE COURT: And he consents to any jurisdictional or
5 venue issues.

6 MR. FRICK: There was no issue raised, yes, sir.

7 THE COURT: No thank you very much. Sorry, go ahead.

8 MS. LIVELY: No. Thank you, your Honor, I didn't know
9 whether he may have walked in when I turned back around.
10 Thank you for handling that.

11 Q Now, Ms. Dixon, the reason why I was asking those
12 questions about the developmental delays or mental issues or
13 anything like that, would that possibly cause you to ask
14 more leading or more focused questions of a child?

15 A Yes. Because usually they're non-leading, open-ended
16 questions, but if there's an issue it may be a lead but it's
17 like we may ask the question but then say "Tell me about
18 it."

19 Q Okay. All right. So do you base that on the needs of
20 the child as well as your intention to let the child tell
21 the story?

22 A Yes.

23 Q All right. Now, do you know a child by the name of
24 Minor 1

25 A I do.

1 Q And when was she referred to your office for a forensic
2 interview, about when that was?

3 A If I can refer to my notes?

4 Q Sure.

5 A She was referred September 4th by Corporal Tobias, a
6 representative of the Chester City Police Department on
7 behalf of the Detective Brian Sanders and Nick Harris.

8 Q And how quickly were you able to actually make contact
9 and interview that child?

10 A Based off of the intake information, September the
11 12th.

12 Q September the 12th. All right. Now, Ms. Dixon,
13 whenever you received that intake information from law
14 enforcement, what information is provided to you for you to
15 know the parameters of what potentially the abuse was as
16 alleged in the particular case?

17 A Just the basics, basically a blind interview. We don't
18 have a lot of information to go off of.

19 Q And what's the purpose of that?

20 A Because we don't want it to be a leading or guided
21 interview. We want to get the child's story of whatever the
22 alleged story may be, or may not be.

23 Q Okay. So whenever you received this information, did
24 you have -- on Minor 1 did you have any idea as to
25 the possible types of abuse at that time?

1 A I did not.

2 Q All right. So whenever -- do you remember meeting with
3 Ms. Minor 1 on that date?

4 A I do.

5 Q And did you conduct a forensic interview of her on that
6 day?

7 A I did.

8 Q Was it pursuant to everything we talked about
9 previously in your testimony? Was it recorded?

10 A Yes.

11 Q Did you avoid leading questions?

12 A Yes.

13 Q When you talked to Minor 1 did she indicate or show
14 to you any type of disabilities or inability to understand
15 the rules of the interview?

16 A None whatsoever.

17 Q All right. Was she clear in her responses to you?

18 A Yes.

19 Q If you asked a question and she didn't understand, did
20 you notice if she actually asked you to repeat the question
21 or tell you that she didn't understand?

22 A As always with all of my children, yes.

23 Q And at any point in time, did you have concerns about
24 the flow of what she was telling you as in did it seem
25 unbelievable or cohesive?

1 A It didn't.

2 Q I'm sorry, I asked that badly. Did it seem
3 unbelievable to you? Was she giving you crazy scenarios?

4 A Based off what I heard, no.

5 Q Okay. All right. A better way to ask it was, was it a
6 cohesive statement which seemed to make sense based on
7 everything she was telling you?

8 A Yes.

9 Q All right. Was there at some point a disclosure of
10 types of abuse by Minor 1

11 A Yes.

12 Q All right. And based upon that information, did you
13 expound on the abuse and how long it had been going on?

14 A I did.

15 Q Now, after -- whenever you're doing that, do you have
16 an opportunity to step out and talk to possibly
17 investigators and DSS workers?

18 A I do.

19 Q You do? And whenever you step out to do that, is there
20 a particular reason why you may want to do that?

21 A Because they may have more information than I do.

22 Q Okay. All right. So in doing that, do you go back in,
23 does it change anything in regards to how you question the
24 child at that point?

25 A Not necessarily the manner in which I question them, I

1 may want a time frame where I may not have asked for one
2 prior to that.

3 Q Okay. All right. And the time frame for children
4 sometimes can be a difficult area to address, correct?

5 A Correct.

6 Q Was Minor 1 able to respond to your follow-up
7 questions?

8 A She was.

9 Q All right. At any point in time, did you have concerns
10 on that day with Minor 1 with any part of her -- the
11 information she was providing to you?

12 A I didn't. I felt like she wasn't being fully coming
13 forth with everything but it was her father and that's to be
14 expected. But I didn't.

15 Q You didn't at that time. And I'm just going to stick
16 with Minor 1 first since we've already talked about her
17 briefly. Did you actually have a follow-up interview with
18 Minor 1 ?

19 A I did.

20 Q You did. And do you remember when that took place?

21 A September 25th.

22 Q Okay. So about two weeks later.

23 A Yes.

24 Q And how did that come across your desk?

25 A Based off of the information I received from DSS and

1 law enforcement, Minor 1 had spoken with the person that
2 she -- that was taking care of her at the time and felt like
3 she had not been totally truthful in telling me everything
4 and she wanted to talk about it. At that point she was in
5 protective care. And so they contacted us the 24th, I
6 believe, which I have 24 hour contact access as far as law
7 enforcement and DSS is concerned, and I asked them to bring
8 her in the following day, that Monday.

9 Q And why do you move so quickly in regards to things
10 like that involving a child's disclosure?

11 A Because a lot of times based off of the situation a
12 child may be in a situation where they feel like they're
13 safe enough to tell and they want you to believe what they
14 have to say, and I had spoken with her earlier and I didn't
15 want to put her aside. Also it's just good to get it when
16 they're ready to talk about it, that's more important than
17 anything else. When they're ready to talk I should be ready
18 to listen.

19 Q Ms. Dixon, did you record that second interview with
20 Minor 1

21 A I did.

22 Q And how did you actually approach that particular
23 interview with her when she came to the room?

24 A It was just more of me -- just talking to her more
25 about, "Hey, I just saw you, how have things been going?"

1 It's good to see you again." Just reintroducing the
2 guidelines of the room as far as what is allowed and what is
3 not allowed. It's like she just opened up. Her demeanor,
4 her body language, everything was different, she just
5 decided to talk more.

6 Q And what did she tell you about the first time that she
7 had talked to you?

8 A She told me that she didn't tell me everything, you
9 know, and she expressed that she wanted to tell me
10 everything now. She wanted to be more open.

11 Q All right. And during that interview, at any point in
12 time did you feel like she was not telling you something
13 believable or something that had happened to her?

14 A I did not.

15 Q Okay. Was she able to give you details that were
16 details in regards to things that she felt on her body,
17 things she saw and other things that seemed to make sense in
18 regards to the allegations of sexual abuse?

19 A Yes.

20 Q All right. At any point in time, did she indicate to
21 you that she had been coached or told to say these things
22 about -- specifically about the defendant, Mr. Corlew?

23 A No.

24 Q And during that interview, did she seem to have any
25 hesitation or inability to discuss the sexual matters and

1 the sexual abuse that she had actually underwent?

2 A No. She was very open with me.

3 Q Okay. Now, after that interview -- once again, that
4 interview was recorded, correct?

5 A Correct.

6 Q And during that time, did she seem mentally capable to
7 understand everything that y'all were talking about?

8 A She did.

9 Q Now, as regarding Minor 1 were those the only
10 two interviews that you actually conducted with that
11 particular child?

12 A Yes.

13 Q Do you remember what her age was at the time that you
14 conducted that interview?

15 A Twelve. I can check my notes. Twelve. Because she
16 was born in 2007.

17 Q 2007. So she was actually -- she hadn't turned 12 yet,
18 she --

19 A She hadn't turn 12 yet.

20 Q So her birthday is I think --

21 A . So she hadn't turned 12 yet,
22 she was 11 at the time.

23 Q She was 11 at the time.

24 A Yes.

25 Q I'm going to switch now to Minor 2 Do you recall

1 getting a referral for a child by the name of Minor 2 to
2 be interviewed at the PCASA?

3 A I did.

4 Q And was that around the same time that you received the
5 request on Minor 1

6 A Correct.

7 Q When did you actually interview Minor 2

8 A I actually interviewed Minor 2 later that day, the
9 12th -- September the 12th also, 2019.

10 Q Okay. Now, just for purposes of the record, Ms. Dixon,
11 is Minor 2 biologically related to Minor 1

12 A She is not.

13 Q Okay. And for the record as well, do you recall the
14 name of her parent that was involved in this particular
15 case?

16 A Her mother's name was Sarah Lacy.

17 Q Okay. And then the biological parent of Minor 1
18 would be the defendant, Mr. Bradley Corlew, right?

19 A Correct.

20 Q Now, is Mr. Corlew, was he related in any form or
21 fashion to Minor 2

22 A He is not to my knowledge.

23 Q Thank you. Now, whenever you interviewed Minor 2
24 do you remember how old she was at the time?

25 A Minor 2 would have been about ten. She would have been

1 about ten. I believe she was like a year under Minor 1

2 Q And whenever you interviewed her, had you received any
3 information regarding any kind of mental or medical issues
4 that she may be suffering from?

5 A I understood that she had some medical issues but no
6 mental issues that would prevent her from participating in
7 the interview.

8 Q And whenever you actually started the interview with
9 Minor 2 was there anything that you noticed about her that
10 was different from maybe having interviewed Minor 1 and some
11 of the other kids?

12 A Minor 2 was more -- she was like a preteen but she was
13 more like a child. She was more childlike, more innocent,
14 you know. She was 11 but she still had the heart of like a
15 eight or nine year old, that's how I saw her.

16 Q And based upon your interaction with her, did you
17 differentiate your way of actually doing the interview in
18 any way in asking her questions?

19 A I didn't differentiate from that, I just -- we just --
20 we take it at the child's pace anyway, so her interview was
21 just a little bit slower than Minor 1's that's all.

22 Q Were there times with Minor 2 where she would start to
23 go on a path very quickly away from the interview and you
24 would have to bring her back?

25 A There would be times, yes.

1 Q Okay. And at any point in time when this was going on,
2 did you have any concerns about her not understanding the
3 rules of the interview itself?

4 A She was easily redirected, she came back to where she
5 needed to be so I knew she understood the rules once she was
6 redirected. It was just more concerns of just that
7 childlike mindset she had more so than she would normally
8 have as a child her age.

9 Q And did she give you in your questioning of her sensory
10 details that increased the credibility of the statements
11 that she was giving you?

12 A She did.

13 Q She did? And were these details that dealt with how
14 things felt and what she saw in regards to the allegations
15 of the sexual abuse?

16 A Correct.

17 Q And was she able to give you visual descriptions of
18 things like sexual toys and things that were allegedly being
19 used during the abuse?

20 A Very detailed, yes.

21 Q All right. So once again this was being recorded. And
22 was there anytime during the interview where you had
23 concerns that the child was either fantasizing or not giving
24 you information that appeared to be trustworthy?

25 A No.

1 Q And was her statement cohesive and did it seem to paint
2 a picture of the abuse that she actually suffered at the
3 hands of Mr. Corlew?

4 A Correct.

5 Q Did you at any point in time have a concern in regards
6 to her statement where it didn't seem to make sense in
7 regards to everything else that she had already told you?

8 A Based off the way she described her story, no.

9 Q Did you use anatomical diagrams during the interview
10 with her?

11 A I did.

12 Q Did that help you to redirect her in identifying body
13 parts and things like that as to where she was touched or
14 not touched?

15 A Correct.

16 Q And did that help you in keeping her focused in the
17 interview?

18 A It did.

19 Q And once again she was under the age of 12 at the time
20 the interview was conducted, correct?

21 A She was, correct.

22 Q Did she clearly state to you in the interview who the
23 perpetrator of the allegations of abuse would be against?

24 A She did.

25 Q All right. And who were those perpetrators?

1 A Corlew.

2 Q And what about her mother? Did she tell you anything
3 about Ms. Sarah Lacy?

4 A She spoke of instances where her mother was involved,
5 yes.

6 Q Okay. All right. And the one thing that I asked you
7 about Minor1 I'm going to ask you about as well about
8 Minor2 was there a time when you actually stepped out to
9 talk to investigators and caseworkers about the interview
10 and any additional information you needed to talk to the
11 child about?

12 A There was.

13 Q There was. And did you reenter the interview room at
14 that time?

15 A I did.

16 Q And once again it was just you and Minor2 in the room,
17 correct?

18 A Correct.

19 Q All right. Was there anything that gave you concern
20 when you went back in and talked to the child regarding her
21 response to you on those follow-up questions?

22 A No.

23 Q Was she still able to understand what it is you were
24 talking about and seemed clear and responsive to the
25 questions you were asking?

1 A She was.

2 MS. LIVELY: Thank you. Answer any questions that the
3 defense may have.

4 THE COURT: Mr. Frick?

5 MR. FRICK: Thank you, Your Honor.

6 CROSS EXAMINATION

7 BY MR. FRICK:

8 Q Ms. Dixon, when you interviewed Minor1 on the 12th you
9 were going to interview some other children in the case as
10 well, correct?

11 A Correct.

12 Q In fact, I think it was supposed to be a total of five
13 interviews; is that right?

14 A It was a total of four.

15 Q In fact, you decided not to talk to the final child,
16 correct?

17 A Correct.

18 Q What was your reason for not talking to the final
19 child?

20 A The child's age.

21 Q The child's age? Okay. Did you not have any concerns
22 about the children being coached?

23 A I did have concerns with the children being coached, I
24 did.

25 Q Okay. Tell me about that.

1 A I had concerns of the children being coached to the
2 sense of just them wanting to go home, that's just -- them
3 wanting to be with their parents. That's just a normal --
4 that's a concern that I carry with every interview, the
5 possibility.

6 Q Right. But in this particular circumstance it
7 concerned you greatly enough that you didn't have the final
8 interview.

9 A Correct.

10 Q Okay. And, in fact, I think you -- it's noted in some
11 DSS records, not your records, that you observed one of the
12 children talking to one of the parents; is that correct?
13 Or -- I think you said you saw Elaina (phonetically) talking
14 to Heather.

15 A They weren't talking -- they were talking to a
16 stepmother. Because the parents weren't allowed -- they
17 were the alleged perpetrators, so alleged perpetrators
18 aren't allowed on our site, so that was a concern of mine,
19 yes.

20 Q Were all of the children in the -- and I don't know
21 where everybody sits when they come in the room, the only
22 room I've ever seen is the interview room in a video, were
23 they all out in the same room while you were conducting the
24 interviews?

25 A They were separated.

1 Q They were separated?

2 A Yeah. They had a grandmother with them so everybody
3 wasn't together. There was DSS worker there as well, so
4 everyone wasn't together.

5 Q Okay. Now, your concerns about being coached, did that
6 extend to Minor 1's interview, the initial interview?

7 A Yes.

8 Q Okay. All right. So you do the second interview with
9 Minor 1 and you said that was referred to -- who told
10 you -- was it the parents -- or you said DSS, correct?

11 A Yes. I only take referrals from DSS and law
12 enforcement.

13 Q Okay. So DSS said, "Hey, she's talked to her foster
14 family," and you think maybe there needs to be another
15 interview?

16 A They spoke with law enforcement and law enforcement
17 spoke with me.

18 Q Okay. Is it normal to do a second interview?

19 A There's a possibility that the second interview has to
20 be done, yes.

21 Q What kind of leads you to believe I need to do a second
22 interview?

23 A Second interviews can be -- and done they're called
24 extended interviews, because a lot of times children don't
25 make initial disclosures. So disclosure may be made later

1 on; weeks later, days later. The disclosure can be made if
2 the children are removed away from the alleged perpetrators
3 or put in a different environment where they feel more
4 comfortable and ready to talk. There's various reasons as
5 to why we would do a followup interview, or an extended
6 interview.

7 Q Okay. What led you in this particular case?

8 A They were removed from their caregivers. They weren't
9 removed initially, they weren't put into protective care, so
10 when they were removed and put into protective care I had no
11 reason not to deny that investigator a second interview when
12 they said that Minor1 was more open and ready to talk.

13 Q Okay. And that interview took place on the 26th, so
14 about two weeks after the first interview.

15 A On the 25th, yes.

16 Q Okay. All right. Typically in one of these cases you
17 don't want the child to have been interviewed before they
18 talk to you initially, correct?

19 A Correct.

20 Q Like you don't want the case investigator to interview
21 the child about it and then send them to you, correct?

22 A Correct.

23 Q Okay. In this case you've interviewed the child
24 already about the subject and then they come in for a second
25 interview. How do you deal with your concerns about this

1 being a second interview? Obviously you've got to have some
2 concerns, so what do you do to safeguard against, I guess,
3 the suggestion that could be implanted from a prior
4 interview?

5 A Again, the rules are restated and they're reminded of
6 that. And then there's also the situation where -- when I
7 say coaching, the direction in which the coaching is coming
8 or what they're coming -- what they're saying when they're
9 coming into the room. So I look at every child is
10 different, you know, and I only take what they say to me.
11 I'm not the judge and the jury, I just take what they say.
12 I don't put anything in their mouth, and whatever they say I
13 take it and I look at it, and then law enforcement reviews
14 it and takes it to solicitors. I'm just the mediator that
15 let's it go through basically.

16 Q Okay. On the second interview with Minor 1 did you
17 have anymore concerns about coaching?

18 A I didn't.

19 Q Okay. And is it correct that one of your issues that
20 you had with the prior interview with the other children was
21 that they would tell you what the other kids were going to
22 tell you?

23 A The issue I had -- they would say exactly, yes, uh-huh.

24 Q So one would come in and say that this is what the
25 other -- essentially this is what the other one is going to

1 tell you, and that led you to believe that there was some
2 issues with the interviews that day?

3 A That day, yes.

4 Q Did you reinterview any of the other children in this
5 case?

6 A I did not.

7 Q So Minor1 is the only one that got reinterviewed.

8 A Correct.

9 Q Later that day is when you interviewed Minor2 correct?

10 A Correct.

11 Q She was not with that initial group.

12 A She was not.

13 Q Okay. When she was coming in, did you have any
14 concerns having already dealt with the other children that
15 morning about any coaching or anything like that?

16 A Again, coaching is always an issue that sits in the
17 back of my mind with all of my interviews, but to the degree
18 that those children were at, no, I didn't.

19 Q Okay. She was staying with different folks --

20 A Yes.

21 Q -- to your knowledge?

22 A She had already been removed from the environment.

23 Q Okay. All right. And you said she was, I guess, ten
24 or 11, she's got the heart of a eight or nine year old.

25 A Yes.

1 Q Is that to say that she was kind of developmentally
2 slower?

3 A She was more -- it didn't seem as big of a deal to her
4 as it did to the other ones. It didn't -- the abuse itself,
5 it was as though it was just that's what it was, that's how
6 she had to maintain. She had accommodated herself to deal
7 with whatever it was for her life at the time. So
8 considering the fact that she was more or less taking care
9 of herself and she had the medical issue, she was a
10 diabetic, it was just -- I just had to take it a little bit
11 slower with her, not so much as that she was totally
12 mentally delayed, but she just needed to be -- where
13 Minor1 for example, sat in the chair if you noticed. I'm
14 sure you watched the videos, Minor1 sat in the chair, sat
15 up like a preteen, as though she was ready to take on the
16 world. If you will notice that Minor2 sat at the table, and
17 that's where my little children sit. And I just had to take
18 it just a little bit slower with her.

19 Q Okay. Okay. All right. You said she would kind of
20 wonder off topic and you would have to bring her back on
21 topic, correct?

22 A Correct.

23 Q How do you -- how did you redirect her without leading
24 her?

25 A That's with any child. Okay? I know -- I listened to

1 what they have to say and then I say, "Okay. So can we go
2 back to what we were talking about originally?" And then it
3 could be the pictures or it could be whatever they were
4 talking about, and a child would just pick up from where
5 they are. I meet the child where they are.

6 Q Okay. In all of these instances, obviously you don't
7 know a whole lot about the case, don't want to know a whole
8 lot about the case before you talk to the kids. After you
9 talk to them for probably -- well, quite awhile and covered
10 most of the ground I would say, then you step out and talk
11 to the investigators on the case typically, correct?

12 A Correct.

13 Q Obviously the big concern is trying to lead them.
14 After you've already talked to the investigators and come
15 back in, how do you avoid leading at that point?

16 A Because all we're picking up is what they've already
17 put out. I don't go in -- I can't go in and ask them about
18 something that that investigator knows about and they know
19 not to tell me because that's leading. I can only talk
20 about what they have spoken about already.

21 Q So what is the purpose of going out and talking to the
22 investigator and then coming back in?

23 A Because if that's what they want -- like if the child
24 discloses a type of abuse quite naturally they need a time
25 frame, okay? So they'll say, "All right. I need a time

1 frame for that," and that's what we focus on, a time frame.
2 It's just -- and if a child is disclosing something that
3 they already know they already know it, but if they don't
4 know it then we focus on that. But I can't lead them. I'm
5 not going out and getting bites to go back in and try to
6 talk to them.

7 Q So you're not going out and they're going, "Okay. Ask
8 them about this specific situation," and then you come in
9 and ask about that specific situation.

10 A So if a child discloses something, an incident, let's
11 say an incident, and they'll say. "Okay. Well, we need a
12 little bit more about that." I will go in and say, "Can you
13 tell me a little bit more about that? I know you told me
14 this, but can you tell me a little bit more?" If there's
15 more to tell, they tell, if it's not I can't get it from
16 them.

17 Q Okay. So it's simply to expound upon what has already
18 been put out there.

19 A Correct.

20 Q Or to generate a time frame.

21 A Uh-huh.

22 Q Do you remember any specifics about these particular
23 interviews? And I'm specifically on Minor 2's interview.
24 Have you watched it recently or --

25 A To be honest with you I have not watched Minor 2's in

1 the last two weeks even though I know this was coming up,
2 because I just did 12 interviews in the last two days, so I
3 apologize. But is there something -- do I remember
4 specifics?

5 Q Yeah. And I'll ask you -- it's fine. I've dealt with
6 you a long time and you tell me if you know or you don't.

7 A Minor2 disclosed an episode with a sex toy where she
8 was able, I believe, to tell me the color of the toy.

9 Q Well, my specific question is, it's my understanding --
10 and I haven't reviewed, Ms. Boulware reviewed it for me, but
11 my understanding is that you looked at Minor2 and said, "Are
12 you telling me this because that's what happened or are you
13 just trying to get Brad in trouble?" Do you recall asking a
14 question --

15 A I will ask a question like that, yes, I will. That's
16 just the basic understanding that they know the difference
17 between the truth and a lie. Because it's hard for a child
18 to tell me, "Give me an example of a truth and a lie." In
19 going through the interview we will go back to the rules of
20 the truth and a lie, and she needs to understand that.
21 She's understanding that as we go along. So that is a
22 question that I will ask the child.

23 Q So that's part of your typical procedure to gauge
24 whether this person is telling you -- well, we can say it
25 today, the truth or not.

1 A Right.

2 Q Okay. All right. And again, on the second interview
3 with Minor 1 you didn't have anymore concerns about -- you
4 didn't have concerns about that interview as you did with
5 the first one?

6 A I didn't.

7 Q With Minor 2's interview you didn't have any concerns
8 with that one.

9 A I didn't.

10 Q And I know we're not necessarily dealing with this, but
11 the other children that you interviewed you had concerns
12 with them, their interviews, correct?

13 A Again, as with all children that I interview I have
14 those concerns. That's the probability with all children I
15 interview.

16 Q Right. But, I mean, you felt that their interviews had
17 been -- somehow been coached.

18 A Yes.

19 MR. FRICK: All right. Thank you. That's all of the
20 questions I have.

21 THE COURT: Any redirect?

22 MS. LIVELY: Just briefly Your Honor.

23 REDIRECT EXAMINATION

24 BY MS. LIVELY:

25 Q The younger children that you ended up having concerns

1 about that you didn't interview, one of them that came in
2 was Elaina. Do you recall making a comment to DSS that she
3 walked right in and said, "I'm here to tell you that Sarah
4 is bad?"

5 A Correct.

6 Q All right. So when you hear something that like as a
7 forensic interviewer, does that raise a little bit of a red
8 flag to you?

9 A Of a child being coached.

10 Q And that was the younger -- the much younger children,
11 correct?

12 A Yes.

13 Q Elaina (phonetically), Reagan and Paisley
14 (phonetically)?

15 A Yes.

16 Q Now, these children -- once again just because --
17 there's nine total children, correct?

18 A Yes.

19 Q All right. So the children that were Brad's kids,
20 those five, were they still in contact with the alleged
21 perpetrator, Bradley Corlew and his new wife, Heather Judd?
22 Do you know?

23 A At the time of the first interview?

24 Q At the time of first interview. Had they been removed
25 from that location at that time?

1 A They had not.

2 Q They had not. Okay. So Mr. Corlew had contact with
3 them even if it was supervised at that point?

4 A He ask.

5 Q Okay. Now, as for Minor 2 and the Lacy kids, they
6 had been removed completely from the codefendant, Sarah
7 Lacy, correct?

8 A Correct.

9 Q And you have already testified, you have had no
10 concerns about the disclosures or the interviews of those
11 children?

12 A I did not.

13 Q Now, when Minor 1 came to you for that second
14 interview, did she apologize to you?

15 A She did.

16 Q What did she apologize for?

17 A For her attitude for that day, our very first meeting,
18 and that she wasn't being truthful with me about what
19 happened.

20 Q Okay. And was it because it dealt with her dad?

21 A It was.

22 Q But was she able to finally talk to you about that
23 abuse.

24 A She was.

25 Q Did you have any concerns about what she was telling

1 you at that point in time?

2 A I didn't.

3 MS. LIVELY: That's all I have. Thank you.

4 THE COURT: Recross based on that?

5 MR. FRICK: No, sir, Your Honor. Thank you.

6 THE COURT: All right. Thank you, ma'am, you may step
7 down. Any further witnesses?

8 MS. LIVELY: No, Your Honor. That's all from the State
9 in regards to the 17-23-175 element.

10 THE COURT: All right. Let's hear argument.

11 MS. LIVELY: Yes, sir, Your Honor. In regards to the
12 video recordings of both Minor 2 as well as Minor 1
13 , I believe they clearly meet the requirements under
14 the Jesse's law, where we have an interviewer who is very
15 well with qualified in regards to the best practices in
16 conducting the interviews. She interviewed these children
17 in a neutral environment, which is child friendly. She
18 followed all of the protocol requirements, and obviously
19 she's done this over 1,000 times. These children are not in
20 a situation where they had outside influence at that time
21 during the interview. And their statements, Your Honor has
22 had the benefit of listening to them, were coherent,
23 cohesive, made sense. There was not fantastical ideas of,
24 you know, someone -- a spaceship coming down and touching
25 the child inappropriately. These were all statements that

1 seemed to actually be trustworthy in the way that they were
2 disclosed. The leading questions. They weren't leading
3 questions. If there was a question where she did have to
4 refocus Minor 2 because of her emotional youth, it was to
5 redirect her and to give her options, which that's what
6 Margo Dixon and other forensic interviewers are trained to
7 do. So I believe that she totally checks all of the spots
8 in regards to what the Court needs to look at and determine
9 whether or not these interviews were conducted appropriately
10 by someone who is well trained and that the child's
11 statements were cohesive and had guarantees and
12 trustworthiness. Also, Your Honor, both of the girls were
13 under the age of 12 at the time of the interviews, which
14 would mean that these interviews would be subject to being
15 admitted for a jury as part of evidence and an exception to
16 the hearsay rule. So we would just ask the Court to make
17 that finding, that they do come in at the time of the trial,
18 and -- that's it.

19 THE COURT: Thank you. Mr. Frick?

20 MR. FRICK: Well, Judge, of course, the statute says to
21 guarantee the -- particularized guarantees of
22 trustworthiness. I don't have any issue with anything that
23 Ms. Dixon did as the interviewer in this case. I think the
24 concern that I would have is the concern she expressed with
25 the first interviews where there was coaching in these --

1 cases. And then we have a child in Minor1's case who had
2 one of these interviews where there was that concern, and
3 then we come back two weeks later, which is a concern, I
4 mean, having been interviewed previously. I understand that
5 she expressed -- Ms. Dixon expressed no concern with that
6 second interview, but I would be concerned that we had the
7 prior interview that suggests the answers to the next
8 interview. Judge, as far as Minor2's , you know, I think it
9 satisfied the prongs, I would just only have the same
10 concerns about outside influence, but nothing as far as the
11 interview itself.

12 THE COURT: Essentially those are great credibility
13 arguments and things that you will be able to make at trial,
14 but I agree with the State, I do find these statements are
15 admissible. I will allow these statements to come in
16 pursuant to the statute and pursuant to the evidence and
17 arguments presented to the Court today. All right.
18 Anything further for the good of the cause today? Any other
19 issues we need to deal with?

20 MR. FRICK: Not today that I have.

21 MS. LIVELY: Let me just ask one thing, Judge.

22 (Break in proceedings.)

23 MS. LIVELY: I was just checking with him on the blind
24 expert issue, we're just going to obviously wait until the
25 Court will proffer her at the appropriate time at the trial.

1 THE COURT: Okay.

2 (End of the hearing.)

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1 STATE OF SOUTH CAROLINA
2 COURT OF GENERAL SESSIONS
3 COUNTY OF CHESTER
4 2019-GS-12-887, 952; 2020-GS-12-974

5 State of South Carolina

6 Vs.

7 Bradley Corlew

8

9 Chester, South Carolina

10 August 30 to September 2, 2021

11 Before the Honorable Brian M. Gibbons

12 APPEARANCES

13 For the State: Candice Lively, Kaitlyn Easler

14 For the Defendant: William Frick, Kay Boulware

15

16 Reported by: Michael C. Watkins

17 Official Court Reporter

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OPENING STATEMENTS

1 THE COURT: All right. All members of the jury are
2 present. We're having to do the modified seating, ladies
3 and gentlemen, you know, trying to space you out six feet
4 apart, y'all know -- as best we can in this old beautiful
5 courtroom, so bear with us. Thank you for understanding.
6 I'm going to have the clerk of court swear you in as the
7 trial jury and I'm going to talk to you briefly before we
8 start everything. Okay? Madam Clerk.

9 (The trial jury was sworn.)

10 THE COURT: Thank you very much, Madam Clerk. Ladies
11 and gentlemen of the jury, let me talk to you briefly and
12 then I'm going to let the lawyers make opening statements to
13 you if they wish to and we'll go through this process, I'll
14 explain to you how a trial proceeds. Let me tell you before
15 we even start the trial, let me speak to you briefly about
16 that this trial is going to be a lot different from what you
17 might expect, because many people don't have the chance to
18 attend actual court sessions and so -- much less participate
19 in them like you're doing right now, and those people tend
20 to think, just like maybe you did before you walked in here
21 this morning, that from watching stuff on TV and seeing
22 stuff on movies watching on Netflix, Amazon Prime or
23 whatever, that trials are always full of high drama, intense
24 action and riveting circumstances with music in the
25 background and everything. You know, while some of that may

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1 be true at some times, this trial, ladies and gentlemen, is
2 not for entertainment. Okay? It is a fundamental part of
3 our democracy in an effort to make sure that justice is done
4 between the parties before the Court. Making sure that
5 justice is done can often times be a slow, deliberate and
6 repetitive process, the opposite of what you may have seen
7 in media or in movies or on TV or have read in books. This
8 courtroom, this beautiful courtroom and this beautiful
9 courthouse, is a place of honor dedicated to the protection
10 and preservation of citizens' rights through what many have
11 called the greatest justice system ever created. Obviously
12 I know no justice system is perfect, but we've got the best.
13 Okay? The attorneys who are appearing before you are
14 advocates for the parties they represent. The solicitors,
15 they represent the State of South Carolina, but first and
16 foremost -- and, of course, the defense lawyers represent
17 the defendant -- but first and foremost, ladies and
18 gentlemen, they are officers of this Court sworn to uphold
19 the integrity and fairness of our judicial system and to
20 help you and guide you to reach a verdict. You should
21 expect them therefore to be professional, competent and
22 ethical in the representation of their client's interest.
23 Remember, you've just taken an oath to try this case and to
24 reach a verdict, you're also expected to act the same way.
25 Thank you, again, for accepting this important civic duty

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1 and civic responsibility. Let me tell you a little bit
2 about how a trial proceeds. First, the State will make an
3 opening statement to you, they'll do that through the
4 solicitor. An opening statement is not evidence, ladies and
5 gentlemen, it's simply an outline to help you understand
6 what that party expects the evidence will show. Okay? The
7 defendant can make an opening statement if he wants to but
8 he doesn't have to for reasons I'll get into later on.
9 Following opening statements that's when you'll start
10 hearing testimony and considering evidence which may be
11 introduced in this case. I know we've got these panels here
12 so I'm trying to make eye contact with you. Okay? This
13 will consist of testimony from witnesses who will come up to
14 this witness stand and testify, as well as any physical
15 exhibits which may come into the record in this case. I
16 have a court reporter seated below me, he's in charge of
17 making sure the exhibits are marked and everything, and when
18 they're entered into evidence you'll be able to consider
19 those in your deliberations. Okay? Following the
20 completion of testimony and the introduction of evidence,
21 after that's over with the attorneys will again have an
22 opportunity to speak directly to you by what's called
23 closing statements or arguments. Okay? That's an
24 opportunity for each of them to summarize the case from
25 their respective points of view and to try to get you to

OPENING STATEMENTS

1 reach a verdict. Okay? Again, closing arguments aren't
2 evidence. Remember, evidence is what people testify to and
3 what may come into evidence as the trial proceeds.
4 Following the closing statements, ladies and gentlemen,
5 that's when I'll again speak to you directly and instruct
6 you on the law of South Carolina as it relates to the issues
7 which have arisen in this case. After I've completed my
8 instructions to you, that's when you will take the law as I
9 give it to you and your view of the facts or the evidence
10 and start deliberating this case. That's the first time you
11 can start talking about this case amongst yourselves, ladies
12 and gentlemen, is when I tell you you can. Because from
13 starting right now until you've heard everything and I've
14 instructed you on the law, you cannot talk about this case
15 even on your breaks together, or especially when you go
16 home, and I'll get in that in a moment. Okay? This is a
17 criminal case that's been brought by the State of South
18 Carolina who has charged the defendant, Mr. Corlew, Bradley
19 Corlew, with criminal sexual conduct with a minor first
20 degree, criminal sexual conduct with a minor in the second
21 degree, and incest. The charges are contained in -- or
22 described and contained in what's called indictments.
23 Again, these indictments are not evidence of anything,
24 they're simply the description of the charges that the State
25 has made against the defendant. Now, the defendant has pled

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1 not guilty to these charges and is presumed innocent unless
2 and until proven guilty by the State beyond a reasonable
3 doubt. A reasonable doubt is that kind of doubt that would
4 cause a reasonable person to hesitate to act. All right? A
5 defendant has the right not to testify and never has to
6 prove innocence or present any evidence. The burden of
7 proof is always on the State of South Carolina. Now, it's
8 going to be your duty, ladies and gentlemen, to decide from
9 the evidence what the facts are. You and you alone are the
10 judges of the facts. You will hear everything, you will
11 decide what the facts are, and then you will apply those
12 facts that you decide to the law which I give to you, and
13 that's how you reach your verdict. You're the judge of the
14 facts, I'm the judge of the law. Okay? And in following
15 the law you must follow what I tell you whether you agree
16 with it or not. Please don't take -- because I'm the judge
17 of the law in this case, please don't take anything I may
18 say or do during the trial as indicating what you think I
19 think of the evidence. Okay? That's your job. You're the
20 ones who determine the evidence. Now, just like rules which
21 govern sports and other activities, okay, we have certain
22 rules of evidence which control what can come into evidence,
23 what you can consider. So when a lawyer asks something of a
24 witness or offers something into evidence that the lawyer on
25 the other side doesn't think is permitted by the rules we

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1 have, the rules of Court, that lawyer may object. Y'all
2 have all seen this on TV shows and in movies, you know, the
3 lawyer will stand and say "Objection." Okay? And then I
4 will make a ruling on that objection. That's a legal
5 ruling, it has nothing to do with you. Okay? Because
6 remember, you're the finders of the facts. Okay? I may
7 have the lawyers come up and argue the law to me on the
8 issue, or I may have y'all go back to your jury room while
9 the lawyers argue the law to me and then I'll make a
10 decision. If I sustain an objection that means the question
11 cannot be answered or the thing cannot come into evidence.
12 If I overrule an objection that means the question can be
13 answered or the thing can come into evidence. Now, you
14 know, if I sustain something you're not to sit there and
15 speculate about what the answer would have been or what the
16 thing would have shown because that will be going beyond
17 what your role is. Your role is to determine the evidence
18 in this courtroom, and if something doesn't come into
19 evidence that means you can't consider it. Okay? We're not
20 trying to keep anything from you, ladies and gentlemen, it's
21 just our role here is to determine -- as lawyers and as the
22 judge is to make sure that you have the best evidence
23 possible as you come up with whatever your verdict is going
24 to be in this case. Okay? Now, in deciding the facts of
25 this case, ladies and gentlemen, you may have to decide

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1 which witnesses to believe and which witnesses not to
2 believe. You can believe everything a witness says, only
3 part of it or none of it. Now, you're not going to be
4 allowed to take notes concerning the testimony of the
5 witnesses during this trial. For this reason, ladies and
6 gentlemen, I'll ask that you pay close attention to what the
7 witnesses testify to and how they testify so you will be
8 able to accurately discuss these facts during your
9 deliberations. Okay? And at the end of the trial you're
10 going to have to make your decision based on the evidence
11 that's been presented. You're not going to have a written
12 transcript of the trial to consult, and it's very difficult
13 and time consuming for my court reporter to read back or
14 play back lengthy testimony, so please pay attention as the
15 trial proceeds. Okay? Now, until I advise you to begin
16 your deliberations you must not and cannot discuss this case
17 with anyone including your fellow jurors, friends, family
18 members or anyone else involved in this case. When you
19 leave this courtroom you are not to do any independent
20 research on the matters involved in this case. Don't Google
21 names, don't look up stuff, don't go on social media and
22 talk about being picked to be a juror in a case. Okay? If
23 you do that you're violating your oath that you just took as
24 a juror to consider the evidence presented in this courtroom
25 and only this courtroom and to come up with your verdict.

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1 Okay? So for that reason I ask and I'm ordering that you
2 cannot talk about this case with anybody. Now, I'm not
3 naive. When you go home, you know, your significant other
4 may ask, "What are you doing? Well, I got picked for a
5 jury, I'm on the trial jury. Well, what's the case about?
6 Well, the Judge said it's about this but that's it, I can't
7 talk with you about anything else, the Judge said I can't do
8 it." Make me the bad guy. I'm used to being the bad guy.
9 Okay? No big deal. Okay? You just can't talk about it.
10 Okay? So the only people you can talk about what your
11 verdict is going to be is when I tell you you can at the end
12 of the case and that's going to be just between the 12 of
13 you. Okay? So I want to make sure we all understand that.
14 So don't listen to any news reports about it, don't read any
15 newspapers, don't do any independent research when you leave
16 or we go on recess. Okay? And if anyone continues to
17 attempt to try to talk to you after you've told them what I
18 just told you, let me know who they are and trust me, I'll
19 handle it. Okay? Now, it's very important, ladies and
20 gentlemen, as I finish and the lawyers start to talk to you,
21 that you keep an open mind and not decide any issue in this
22 case until all of the evidence has been submitted, the
23 parties have made their closing arguments to you and until
24 I've instructed you on the law of this case. It is your
25 solum responsibility to determine the guilt or innocence of

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1 the defendant, and your verdict must be based solely on the
2 evidence presented to you in this trial from this witness
3 stand and this courtroom and on the law as I instruct during
4 and at the close of the trial. At this time we'll proceed
5 with opening statements. Madam Solicitor?

6 MS. LIVELY: Thank you, Your Honor. A ten year old
7 little girl, she's already somewhat different, she has
8 cerebral palsy, she has diabetes, and she's the oldest of
9 her four children in her family. This ten year old little
10 girl when she was in Chester City during the time of
11 December 2018 until she turned 11 had her first sexual
12 experience with that man at ten years old. And the law in
13 South Carolina requires -- well, it's the requirement across
14 our great country, if you're accused of a crime, especially
15 one as heinous as this, you have a right to confront your
16 accuser. So that ten year old little girl, who is 13 now,
17 is going to come here, she's going to sit in this stand and
18 she's going to tell all of you about her first sexual
19 experience at the age of ten, how she would at night sit in
20 her bedroom hoping that it wasn't her turn, but she would be
21 called into the bedroom by that man. He would tell her,
22 "Get in the bed with us." And here is the sad thing, on top
23 of everything else that's sad, it's her own mother, Sarah
24 Lacy, his live-in girlfriend at the time, would be in the
25 bed with him with her own daughter while he penetrated her

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1 for his own sexual gratification. It didn't happen once, it
2 happened over and over, and the State has to show you that
3 by bringing the witness in here and have her testify to you
4 about her first sexual experience. But there's more. His
5 own daughter, her name is Minor 1 she's 11 years old living
6 here in Chester at Ella Street, the same rules apply to
7 her. She's got to get up here on this stand, face all of
8 you who are complete strangers to her, and she's going to
9 tell you about her sexual experiences at the hands of her
10 own biological father. This was happening in the City of
11 Chester, a sinister secret that the defendant convinced
12 those girls to never tell. So this went on and on and on.
13 I'm going to give you a little bit of the background so you
14 will understand how all of this came to be. The defendant
15 has five children of his own, the oldest one being Minor 1
16 who is the girl that I just now mentioned that he sexually
17 abused. He also has a son by the name of Bradley C.
18 who is a year younger than Minor 1 Then he has
19 Elaina (phonetically). Then he has I believe it's Paisley
20 (phonetically) and then Reagan (phonetically), who is the
21 youngest. Five children under the age -- or 11 and under.
22 At the time the mother of his youngest three children dies
23 in December of 2017, so he's looking for someone to help him
24 with his children. He goes to Florida, he has a family
25 member there, and when he's in Florida he meets a woman by

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1 the name of Sarah Lacy. Sarah Lacy has four children of her
2 own, the oldest being Minor 2 the ten year old with cerebral
3 palsy and diabetes that I just told you about when I first
4 started talking to you. She also has three other children;
5 Shawn L. she's got Bailey L. and then the youngest,
6 Emma L. They meet. They have some type of chemistry
7 that draws them together and come back to Chester, South
8 Carolina to live together, nine children and two adults.
9 Things start to go really wrong whenever they move from a
10 house that they were living in in Blacksburg (sic) and they
11 actually move -- or Blackstock, I'm sorry, and they actually
12 move here into the City of Chester at Ella Street. When
13 they move in there you will hear the testimony of not only
14 Minor 1 his own daughter, but also of Minor 2 the ten year
15 old, who's going to tell you they started having sex in
16 front of them; Brad, the defendant, and Sarah. It became a
17 way of life. She would leave -- Sarah would leave her sex
18 toys and dildos out, they used those on the children. It
19 was a way of life. It was a repetitive way of life. They
20 were isolated, they were under his control. They didn't go
21 to friends' houses, they didn't go to church, some of them
22 were kept out of school. They lived in that home on a daily
23 basis being exposed to all kinds of sexual acts. It became
24 normal. It became their way of life. And children are
25 resilient, they learn to live with it, but it's still a

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1 brutal crime. So after they're here for a period of time,
2 nine children in one house can be quite a bit, the house
3 becomes a problem. It's filthy. A part of, for some
4 reason, the pleasure, or whatever it may be, you don't have
5 to understand it, from the defendant and his girlfriend,
6 Sarah Lacy, was to make the children urinate on the floor
7 and not clean it up. It was just a part of the control,
8 ladies and gentlemen. And you'll hear all of that from the
9 mouths of the two children who were the oldest at the time
10 who can tell you what they lived through in that house of
11 horrors, and that's what it was. So at some point Sarah
12 starts to separate from the defendant. When she's able to
13 actually get away from him, take her children away, this is
14 when things start to unravel. This is when the police get
15 involved, Department of Social Services gets involved, and
16 then the entire house of horrors door becomes wide open.
17 The sinister secrets of that defendant and what he was doing
18 behind those closed doors, along with his girlfriend, Sarah
19 Lacy, who did not stop him, now is before all of you. So
20 what you're going to hear is important information about
21 what they lived through. What you're also going to hear is
22 that Sarah Lacy by turning in herself and giving a full
23 statement to police, she admits to everything that was going
24 on in that house of horrors. She said everything and she's
25 going to testify before you this week. And, yeah, the

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1 defense is going to bring up, "Oh, the State gave her a deal
2 so that she would come and testify." Okay. This is true.
3 But she had already confessed, number one, to everything
4 that happened, so she was already locked in whether I
5 offered her anything or not. By the time I offered to get
6 her to come up here and tell her story in front of all of
7 you, whether the humiliation of it, the embarrassment of it
8 or whatever, her statement was already locked in. She's not
9 doing me any favors. I didn't offer her something so she
10 would confess, she had already confessed. So think about
11 that when you think about her getting a special deal,
12 because she's not. If she doesn't fully cooperate and tell
13 all of you exactly what she's been telling everyone else
14 then that deal is gone and it will be her turn next time.
15 Here is the other thing: Children, whenever they -- these
16 type of allegations come about, they get interviewed by
17 people who are trained to interview children, because we
18 don't want people using leading questions, we want the
19 children to tell their experiences and what happened, we
20 record those interviews. You will be watching the
21 interviews of Minor 2 as well as Minor 1 close
22 in time to whenever all of this abuse was disclosed. You
23 will hear it not only from their recordings, but you're
24 going to hear it from them physically standing, sitting in
25 front of you and telling you what the defendant and Sarah

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1 Lacy did to them. You will see it for yourself. You will
2 hear it for yourself, and you're the only ones who can
3 decide the credibility of these children and whether or not
4 they're telling you experiences that they truly encountered.
5 **Minor 1** being the biological daughter of the defendant, had
6 two interviews. And I'm just going to tell you from the
7 very beginning she was still protecting her father, because
8 it doesn't matter often what a parent may do to you, you
9 love that parent. So in the first interview you will see
10 and hear for yourself where she does not point the finger at
11 her father, but she does at Sarah. She definitely does at
12 Sarah. Once **Minor 1** is removed from this defendant having
13 contact with her and she is put in emergency protective
14 custody and she has no contact with him, guess what? She
15 feels safe. And the evidence will show that she came to the
16 realization that what her father did to her was wrong, and
17 even though she may refer to him as a good man, she knew
18 what he did was wrong and she asked to be able to come back
19 and tell. You're going to see that second interview. So
20 ladies and gentlemen, there's going to be a lot of testimony
21 in this case. There's going to be interviews. You're even
22 going to hear from the defendant through his interviews. He
23 gets right to the edge. Oh, he'll tell you what Sarah did,
24 he'll tell you he knew about it, "Oh no, I'm not a monster,
25 I didn't do it." And that's where it's going to fall on all

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1 of you to figure him out to reveal his sinister secret and
2 to find him guilty at the end of this case. Sexual battery
3 doesn't mean he held somebody down and brutally beat them,
4 but it's no less brutal when it's a ten year old and you
5 penetrate her genital area, that is sexual battery. If you
6 have a child perform oral sex on you like the defendant did,
7 that is criminal sexual conduct with a minor. If you put
8 dildos inside of a child's vagina, that is sexual battery.
9 Ladies and gentlemen, that is what you're going to hear.
10 And if you do it to your own daughter, that's incest. And I
11 will be coming back in front of you asking all of you to put
12 all of that together and find him guilty of all three
13 charges. Thank you.

14 THE COURT: Thank you, Madam Solicitor. Mr. Frick?

15 MR. FRICK: Thank you, Your Honor. First and foremost
16 I want to thank all of y'all for being here today, this
17 week. This is going to be a difficult week, I think you
18 know that, you knew that when you heard the case called. I
19 like to look over at jury panels and when cases get called
20 and you can see the shock and surprise when they hear what
21 the allegations are, and you're going to hear some horrible
22 things this week. And you're going to hear some horrible
23 things happen to some young children from at least a person
24 who they should have trusted. And the allegations are that
25 Bradley Corlew did these things, and you're going to hear

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1 from a person who admits that they did this. It's a tough
2 thing. It's real, real easy to listen to the portrayal of
3 the case by the State and jump to a conclusion. See, these
4 are the type of cases that you hear about on the news, you
5 see them and you have an instant judgment because that's the
6 side of the story that they tell you. That's not how this
7 works. Mr. Corlew has been charged, yes, but that does not
8 mean he is guilty of a thing. As we're all aware in the
9 United States of America you are innocent until you are
10 proven guilty by the government. The government has to
11 prove with competent evidence, and what competent evidence
12 is is believable evidence. And what's believable? Well,
13 the solicitor can tell you all day long what somebody is
14 going to say from that stand, that's fine, but only you can
15 judge whether it's believable or competent evidence. And
16 you get to look at the people who get on this stand, whether
17 they're ten, 12 or 85, you can judge whether or not you
18 believe what they're telling you. Because guess what?
19 People have motives. People have reasons why they say what
20 they say. And it's your province and your province alone,
21 nobody in this room can take it away from you, to determine
22 whether there's any motive or bias or reason why somebody
23 says what they say. Are we going to talk about Sarah Lacy's
24 deal? You're darn right we are. You're darn right we are.
25 Because when she realized that she was in trouble she began

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1 to cut a deal with the State and threw Brad under the bus.
2 Is that important? Again, you'll hear the testimony and
3 you'll get to decide that. I submit to you it's very
4 important, and we'll get into that as it goes along. Look,
5 any cases that involves children, particularly children of
6 this age, it is very easy to let your emotions get in the
7 way, to let personal feelings get in the way. Any parent
8 has those personal feelings. I got children, I understand,
9 I know how I would feel, but that's not your job here today.
10 You're more than welcome when you walk in that final time in
11 the jury room to go deliberate to cuss about how disgusting
12 this whole situation is, but then you've got to put it aside
13 and get to the work that you've taken an oath to do this
14 week, which is to hold the State to their burden, meaning
15 they've got to prove these allegations that Bradley Corlew
16 did these horrible things to these children beyond a
17 reasonable doubt. And let's be clear what that is. The
18 Judge is going to tell you at the end what it is, I'm going
19 to tell you right now and I'm going to tell you in closing
20 again what I believe it is, it is there is no other
21 reasonable explanation but Bradley Corlew did what they say
22 he did. That's it. If after you've heard all of the
23 testimony you think, "Wow, I don't know, I've been looking
24 at him, I just don't like the shirt he's wearing or that
25 Gamecock mask, I think maybe he's guilty." That's not

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1 enough, ladies and gentlemen. If you probably think he did
2 it it's not enough. They've got to show to you beyond a
3 reasonable doubt that these things happened but that he did
4 them. They happened, I can't deny that, you're going to
5 hear what happened, but did Bradley Corlew participate.
6 That's what the charge is. So remember, I know it's tough,
7 it's real easy to get emotions in the way, but you took an
8 oath to uphold the constitution of our state and our country
9 to make sure that a person isn't convicted unless and until
10 the State has given you that competent evidence. And I
11 submit to you you're going to get frustrated, you're going
12 to get confused, you're going to get angry, but in the end
13 you must do your duty that you swore to do and uphold the
14 constitutional right to still be innocent until proven
15 guilty, and in the end I'll come back and ask you to render
16 a verdict as such. Again, thank you for your service.

17 THE COURT: Thank you, Mr. Frick. Ladies and gentlemen
18 of the jury, I'm aware of what time it is, it's almost
19 12:30, y'all have been here awhile already so let's go ahead
20 and take a lunch recess. I want you back in your jury room
21 at 2:00 p.m. Remember what I told you and instructed you
22 when you leave this courthouse, or even when you're back
23 there, you cannot start talking about this case until you've
24 heard everything, and do not talk to anybody about this case
25 or seek out any other information. We'll see you back at

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1 MS. LIVELY: Tomorrow morning.

2 THE COURT: Okay. What we're going to do by previous
3 pretrial hearing, I think I indicated to you, certainly as a
4 right of confrontation and I'm not going to disturb that
5 right, but I am going to modify it just a bit. Instead of
6 him sitting where he's sitting now I'm going to ask that he
7 have a seat where Investigator Reynolds is seated tomorrow
8 when the children testify. I think that would be, you know,
9 in the best interest of the children. That way he is able
10 to see and able to confront, in air quotes, as far as I'm
11 concerned and I think that's reasonable. Any objection to
12 that?

13 MR. FRICK: Your Honor, I would just say, the way the
14 table is twisted I can barely see the witness box from here.
15 I don't think he can be seen. In normal circumstances it's
16 hard to see the witness box. But we will keep him at the
17 end of the table, which is practically in the grand jury
18 box.

19 THE COURT: All right. Well, y'all look at it and
20 we'll make a determination. Madam Solicitor, you take a
21 look at it and see. If that's fine, that's fine, I don't
22 know, maybe -- Investigator Reynolds can you see the --
23 Kenny get out of the way -- can you see --

24 SPEAKER: There's a glare, I can't see, Your Honor.

25 THE COURT: Okay. What about where he is right there?

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1 SPEAKER: I can see.

2 THE COURT: You can see? Well, we'll just figure out
3 what we're going to do. I may have him seated over there to
4 the right of Mr. Nielson. And I've done it before, and I've
5 done it on cases that have gone up the appellate route, I've
6 had people turn around and look the other way. Okay. So I
7 think this is in my discretion so I may have him seated over
8 there where Kenny is standing. Okay? That way the children
9 don't have to make eye contact.

10 MS. LIVELY: Yes, sir, Your Honor. And I clearly think
11 that does not violate any form of confrontation.
12 Confrontation is his ability to, you know, talk to the
13 lawyer, assist with cross examination, he does not have to
14 be glaring into the eyes of the children.

15 THE COURT: Okay. We'll make that determination
16 contemporaneously but that's where I'm leaning toward, if
17 there's any other argument about that we can deal with that
18 at the time. I think right now I'm going to have him seated
19 two seats down from where Mr. Nielson is seated right there
20 right in front of -- right behind where Kenny is standing
21 right now, so --

22 MR. FRICK: Just when they testify, though, correct?

23 THE COURT: Just when the children testify, the rest of
24 the time he will be right there, and nobody will notice.
25 Okay?

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1 MR. FRICK: We'll argue further.

2 THE COURT: I understand. Thank you. We're down for
3 lunch, see y'all at 2:00.

4 (A lunch break was taken.)

5 THE COURT: Anything from the State before we bring the
6 jury out?

7 MS. LIVELY: Not from the State, Your Honor.

8 THE COURT: Anything from the defense before we bring
9 the jury out?

10 MR. FRICK: No, Your Honor.

11 THE COURT: All right. Let's bring them out.

12 (The jury returned to the courtroom.)

13 THE COURT: All right. All members of the jury are
14 present. Madam Solicitor, you may call your first witness.

15 MS. LIVELY: Yes, Your Honor, thank you. The State
16 would call Keesha Tobias to the stand.

17 The witness, KEESHA TOBIAS, was first duly sworn and
18 Testified as follows:

19 THE COURT: You can remove your mask since you're
20 behind the plexiglass if you don't mind. Solicitor?

21 MS. LIVELY: Yes, thank you, Your Honor.

22 DIRECT EXAMINATION

23 BY MS. LIVELY:

24 Q Ms. Tobias, please tell this juror where you work.

25 A Chester Police Department.

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1 Q And what are your job duties there?

2 A I'm a victim's advocate.

3 Q How long have you been in that position?

4 A I've been in the position for three years, I've been
5 with the city for 14.

6 Q For 14 years. And that's the city police department,
7 right?

8 A Yes.

9 Q And what are your job duties as a victim advocate?

10 A My job duties are to assist the victims in any
11 financial aspects, any educational aspects, to ensure their
12 safety if a crime has been committed against them.

13 Q And when you are responding to someone who presents
14 themselves as a victim, at that moment is that how you treat
15 them?

16 A Yes.

17 Q All right. And did you have an opportunity in August
18 of 2019 to be contacted by a potential victim in a case?

19 A Yes, ma'am.

20 Q Please explain to the jury exactly how this particular
21 case came to the city police department.

22 A This particular case came to the city by the way of
23 Rock Hill Police Department. They contacted us to state
24 that they had a potential victim who had some domestic
25 violence things that had happened in a home here in Chester,

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1 and we had to immediately establish jurisdiction for that,
2 and we did establish that it did happen in the City of
3 Chester at that time.

4 Q Do you recall what the address was in the City of
5 Chester that would have made it your jurisdiction?

6 A Ella Street.

7 Q And is that the street that's right across from the
8 maintenance -- I think it's like a fenced off area where
9 Ashford Street is in the city?

10 A It would be the cross street for our public works
11 building.

12 Q Public works. Thank you. All right. And you're
13 familiar with that particular area?

14 A Yes, ma'am.

15 Q All right. So when you got that original report from
16 law enforcement in Rock Hill, did you have the opportunity
17 to actually meet with the alleged victim?

18 A I did.

19 Q And what was her name?

20 A Her name is Sarah Lacy.

21 Q And what happened whenever you met with Sarah Lacy?

22 A I met with Sarah Lacy, I think the exact date was
23 August 22nd or 23rd. She came to my office with her
24 children, her minor children, with four children, and she
25 sat down with me and experienced (sic) to tell me how she

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1 was -- has been abused by her boyfriend/husband/lover with
2 her minor children in the home.

3 Q And did she provide a name of who this alleged abuser
4 was?

5 A She did. She said his name was Brad Corlew.

6 Q And did you know Mr. Corlew or had any dealings with
7 him in regards to this particular case prior to meeting with
8 her that day?

9 A No, ma'am.

10 Q Now, when was the -- when did she allege that something
11 had happened to her in Chester City at the hands of Mr.
12 Corlew?

13 A She alleged that on that date in August.

14 Q In August. All right. Was she still with the
15 defendant, Mr. Corlew, at that time?

16 A Yes and no.

17 Q Okay. What do you mean by that?

18 A So she said they were still in contact, so they were
19 still in contact by phone she stated, and that she was
20 trying to get away from him.

21 Q And did you actually -- when she was speaking with you
22 on that day, at any point did you have concerns about taking
23 her statement without giving her some type of, I guess,
24 instructions?

25 A I did. Initially when she came in she wanted to

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1 discuss domestic violence and I wanted to make sure she knew
2 her rights as a victim, because victims do have rights,
3 rights to be notified, so I wanted to make sure that she was
4 aware of her rights, and that a report would be done for
5 her. But I also wanted to make sure during that time that
6 she understood that the statements that she was making to me
7 was freely and voluntarily. The statements that she began
8 to make at a later time, approximately 15 or 20 minutes
9 later, became incriminating on her behalf. I had to stop
10 speaking with her and immediately left my office unattended
11 with her in it and went and spoke to an investigator.

12 Q Which investigator did you go and speak to?

13 A Lieutenant Brian Sanders and Sergeant Nicholas Harris.

14 Q And at that time when you described what had come out
15 during that sit-down with Ms. Lacy, what did y'all decide to
16 do -- or what did the investigators decide to do and you
17 also went along with?

18 A They decided for me to not continue to talk with her or
19 get anymore information about the domestic violence, and
20 decided to take her into our conference room in a larger
21 area where I could just kind of play with the kids, because
22 they were in the playroom next door to my office, monitor
23 them while they spoke to her.

24 Q I'm going to show you what's been marked as State's
25 Exhibit Number 14. I'm going to go ahead and show you 15,

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1 16 and 17, and just ask you if you recognize these four
2 forms?

3 A I do recognize all forms.

4 Q What are these forms for?

5 A These forms are our Miranda rights forms. Each time an
6 individual is questioned in our department or interrogated
7 they are to sign these forms freely and voluntarily, that
8 you can decide to sign them or not.

9 Q All right. And let's start with the very first one,
10 which would be State's Exhibit Number 14. Was that
11 particular Miranda form signed by Sarah Lacy?

12 A Yes. It was signed by Sarah Lacy on the 23rd,
13 August 23rd.

14 Q And were you a witness to that?

15 A I was.

16 MS. LIVELY: Your Honor, the State would move State's
17 Exhibit 14 into evidence.

18 MR. FRICK: No objection.

19 THE COURT: Without objection introduced.

20 MS. LIVELY: Thank you.

21 (The waiver form was received as State's 14.)

22 Q And you can just set it to the side? Thank you.
23 State's Exhibit 15 -- well, let me ask you this: On 14,
24 what's the date on that particular Miranda form?

25 A August 23rd, 2019, the date that she appeared in our

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1 office.

2 Q August 23rd. So that was your first contact with Ms.
3 Lacy.

4 A Uh-huh.

5 Q All right. So the next one, which would be State's
6 Exhibit Number 15, same question, is that the standard form
7 that you use for Miranda?

8 A Yes, it's the standard form.

9 Q And who signed and initialed that form?

10 A Sarah signed this form.

11 Q And what's the date on that particular one?

12 A August 26th of 2019.

13 Q All right.

14 MS. LIVELY: Your Honor, the State would move State's
15 Exhibit 15 into evidence at this time.

16 MR. FRICK: No objection.

17 THE COURT: Introduced.

18 (The waiver form was received as State's 15.)

19 Q And State's Exhibit Number 16. Okay. State's Exhibit
20 16. Is that the same document?

21 A Yes.

22 Q All right. Is it a different date?

23 A Different date, August 29th, 2019.

24 Q All right. And who was the person that signed waiving
25 her rights?

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1 A Sarah Lacy.

2 Q Who witnessed that?

3 A I did.

4 Q All right.

5 MS. LIVELY: Your Honor, we would move that one in,
6 State's Exhibit 16.

7 MR. FRICK: No objection.

8 THE COURT: Introduced into evidence.

9 (The waiver form was received as State's 16.)

10 Q And then finally, the last one, will you please tell
11 the jury, is that the same type of form?

12 A It is our standard Miranda rights form.

13 Q And did Ms. Lacy initial off of it and waive her rights
14 on that particular day?

15 A She did, September 16th, 2019.

16 Q Okay. September 16th of 2019.

17 MS. LIVELY: All right. Your Honor, we would move
18 State's Exhibit 17 into evidence at this time.

19 MR. FRICK: No objection.

20 THE COURT: Introduced.

21 MS. LIVELY: Thank you.

22 (The waiver form was received as State's 17.)

23 Q Now, Ms. Tobias, the purpose of the Miranda form, is
24 that important in order for you to show to not only the jury
25 but to anyone that she was told what her rights were at that

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1 time?

2 A Yes, ma'am.

3 Q Okay. And when she was there did she seem to want to
4 speak to you?

5 A Freely and voluntarily, openly.

6 Q Okay. Openly? Okay. Tell the jury, was there a time
7 that actually her -- she was given forms in which she could
8 write out a voluntary statement for your agency?

9 A Yes. So the day that she walked into the office and
10 began to make statements that would incriminate herself and
11 I stopped her from talking about all of the things that she
12 had began to speak of, it's that time that the voluntary
13 statement form that is presented through our department was
14 presented to her to begin to fill out from its entirety,
15 from the beginning to the end. She was presented with that
16 form on the 23rd, and she said that it would take her awhile
17 to get it completed.

18 Q So did she give it back to you on the 23rd of August?

19 A She did not.

20 Q And on that particular day, was anything else taken
21 from her in regards to a recorded statement?

22 A Yes. We had an audio/video statement that was
23 completed in our conference room at city hall with one of
24 our body cams.

25 Q And that was documented, correct?

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1 A That was documented.

2 Q Now, during the time that you had conversations with
3 Ms. Sarah Lacy on that day, the 23rd, were concerns raised
4 for you as to the safety of her four children?

5 A Yes.

6 Q All right. Tell the jury as an officer, not a police
7 officer, but a victim advocate, what your concerns were in
8 regards to the children being in her custody.

9 A My regards that particular day with her minor children
10 being in her custody was that one of her children was
11 suffering from some type of illness that day in regards to
12 needing her diabetic needles and she did not have the
13 medication on hand, we had to go and retrieve it. Also this
14 child has cerebral palsy and needed attention that Sarah
15 would need to give to her outside of writing that voluntary
16 statement. So the minor children were not -- they were not
17 able to communicate effectively with law enforcement of
18 their needs that day and wanted to know could they get food,
19 could they get water, and at that time is when I decided to
20 take those children into emergency protective custody and
21 call DSS.

22 Q And when the children were taken into emergency
23 protective custody that day, did you relay that information
24 to Sarah Lacy?

25 A I did. I did.

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1 Q And at that point in time did she still speak with you
2 and investigators that day?

3 A She did.

4 Q And during the conversations, was she able to disclose
5 any types of other abuse that were suffered by the children?

6 A Yes. She said sexual abuse had taken place against her
7 children, she, you know, openly admitted to that in a
8 statement form and verbally on body cam. She said that some
9 of her children and other children have been isolated in
10 rooms without food sometimes. Sexual abuse. Physical
11 abuse, attacking the children, beating the children for not
12 doing something.

13 Q Who was the person that she claimed was committing that
14 abuse?

15 A Brad.

16 Q Is that the defendant, Mr. Corlew?

17 A Yes.

18 Q So after she tells you all of this information -- and
19 remind me, that interview with Ms. Lacy was quite extensive,
20 wasn't it?

21 A It was over three hours.

22 Q It was over three hours. So after that additional
23 information came out to you at that time in that interview,
24 what is the next -- what is the next step in -- like a best
25 practices protocol that you should do in regards to getting

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1 these children -- getting statements from the children?

2 A Okay. The on-call DSS worker has to be called. We
3 have to contact our local dispatch office and the worker who
4 is on call, they have a number they call and they dispatch
5 them out to our location. They did show up, two van loads
6 of them came. Because I did tell them that it was four
7 children and they were minors, smaller children, and they
8 have to prepare to get car seats ready, whatever they're
9 going to need to help these children they have to be
10 prepared at that time, so we have to give them a little bit
11 of knowledge of what's happening. So we called them, and
12 then after that is when we go ahead and do our forensic
13 checklist interviews for PCASA and get those children
14 scheduled to go be interviewed by a specialist.

15 Q And let me just back up for a minute. When you say to
16 get the children interviewed at PCASA, tell the jury, what
17 does PCASA stand for?

18 A Palmetto Citizens Against Sexual Assault.

19 Q All right. And what do they do at Palmetto CASA?

20 A There are experts there who deal with children only and
21 they take the time to interview these children extensively
22 about what has happened to them; when, where and how it
23 happened. They get to know the kids, they establish a
24 rapport and a relationship.

25 Q I'm going to back up just a minute for purposes of a

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1 couple of things you've already mentioned. I'm going to
2 show you State's Exhibit Number 8, because you mentioned a
3 statement by Ms. Lacy. I'll ask you if you recognize this.
4 I believe it's a 16 page document.

5 A I do recognize this statement.

6 Q Okay. Who wrote that statement?

7 A Sarah Lacy.

8 Q Sarah Lacy? All right. And in that particular
9 statement, did she give that right back to you after you
10 gave it to her on the 23rd or --

11 A She did not.

12 Q What's the date on that particular statement?

13 A August 29th.

14 Q August 29th?

15 A Uh-huh.

16 Q I'm going to show you a couple more pictures, these are
17 marked State's Exhibits 11 and 12, and ask you if you
18 recognize what's in these two photos?

19 A Yes.

20 Q Okay. And tell the jury what you recognize that to be.

21 A This is the house where all of the allegations took
22 place.

23 MS. LIVELY: Let me show that to the defense real
24 quick. Again, this is State's 11 and 12. Your Honor, the
25 State would move in 11 and 12 at this time.

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1 MR. FRICK: No objection.

2 THE COURT: Without objection entered into evidence.

3 (The photos were received as State's 11-12.)

4 Q So this home, which is shown in 11 and 12, once again
5 you said that's the Ella Street house?

6 A Yes, it is.

7 Q Okay. And this is where the abuse took place?

8 A Yes.

9 Q According to Sarah Lacy.

10 A According to Sarah.

11 Q How many children were living in that home?

12 A Nine.

13 Q Nine. All right. How many biological children -- I
14 think you already said Sarah had four children, correct?

15 A She did, she had four. She has Minor 2 Shawn, Emma and
16 Bailey.

17 Q And were they all under the age of 11?

18 A Yes.

19 Q And were you aware of how many children the defendant
20 had?

21 A He has five.

22 Q He has five?

23 A Uh-huh.

24 Q And at some point did you have an opportunity to meet
25 his five children?

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1 A Yes.

2 Q But up until that time when you said that you made the
3 request for the interviews of those four children, those
4 were just Sarah's children at that time; is that correct?

5 A Correct. Those were just Sarah's children.

6 Q Okay. Now, was Sarah and the defendant, were they --
7 did they have any biological children together?

8 A No.

9 Q And were they married?

10 A No.

11 Q So at the time that you were starting this
12 investigation everything you're learning is from Sarah Lacy;
13 is that correct?

14 A That's correct.

15 Q At what point did you personally have an opportunity to
16 speak with the Defendant Corlew?

17 A Never.

18 Q Never. And at some point did you ever have the
19 opportunity to come into contact with his five children?

20 A I did.

21 Q You did? How did that happen?

22 A After Sarah's kids were submitted for a forensic
23 checklist we had to go find Mr. Corlew's children to find
24 out -- and that was because of the details that were
25 rendered during the Lacy children's interview. So DSS did

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1 make some efforts in finding and was unsuccessful at that
2 time, but a couple of days later they did find those
3 children, and they were also submitted for a forensic
4 interview. So those referrals were sent in September. So
5 they were also interviewed and I was able to meet with them
6 then.

7 Q All right. So whenever the children were actually also
8 being sent to PCASA was when you had the opportunity to make
9 contact with those five children.

10 A Yes.

11 Q All right. And who was the one that actually fills out
12 the referral forms so that PCASA will know how many kids
13 were coming to them on a particular day?

14 A Myself or either an investigator, and I filled those
15 forms out for that particular incident.

16 Q Okay. And so -- let's just step back for a minute.
17 Whenever Sarah after she had given you all of this
18 information, did she have other family or extended family in
19 the area that she could reach out to?

20 A No. She stated that her family lived out of state.

21 Q Did she have a job?

22 A No.

23 Q Did she have any money?

24 A No.

25 Q Did she have a place to stay?

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- 1 A She said not at the time.
- 2 Q So you took her children into emergency protective
- 3 custody. Do you know where Sarah went at that point?
- 4 A She went to a hotel she said in Columbia.
- 5 Q Did you maintain contact with Ms. Lacy at that point?
- 6 A I did.
- 7 Q All right. Now, whenever you made contact with the
- 8 defendant's children, was he still living with them at the
- 9 Ella Street location?
- 10 A No.
- 11 Q All right. Where were they?
- 12 A They were living in Chester County with another young
- 13 lady.
- 14 Q Do you remember by chance what her name was?
- 15 A Heather Judd.
- 16 Q Do you know where she's employed?
- 17 A Chester County Sheriff's Office.
- 18 Q And at the time whenever -- did you have any knowledge
- 19 as to what their relationship was at the time whenever you
- 20 learned that is who she was?
- 21 A No, ma'am.
- 22 Q All right. Did you ever actually speak with her and
- 23 him together at any point?
- 24 A No, ma'am.
- 25 Q Now, you've already got the Miranda warnings in, there

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1 were four of them total. The one on September the 16th of
2 2019, do you know whether or not that's the day that Sarah
3 Lacy was arrested?

4 A Yes. That is the day she was arrested.

5 Q Was she facing the same charges that the defendant,
6 Corlew, was facing?

7 A Yes.

8 Q Well, let me back up. In regards to the children being
9 sent for forensic interviews or just investigative
10 interviews at PCASA, did you get the opportunity to watch
11 any of those interviews?

12 A I did.

13 Q Okay. Which children did you get to watch?

14 A All of them.

15 Q All of them. All nine of them.

16 A Everyone but the two year old, Reagan, she just came in
17 for a few minutes, she didn't have a full interview because
18 of her age.

19 Q Because of the age.

20 A Uh-huh.

21 Q So whenever you actually do those -- when you observe
22 those interviews and you're there, are you given a copy of
23 the interviews once they're done?

24 A Yes.

25 Q All right. Did you provide copies of those interviews

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1 to the solicitor's office, myself, as evidence in this case?

2 A I provided it actually to the investigator and then
3 they provided it to the solicitor's office.

4 Q Okay. Whenever you made contact with the defendant and
5 Heather, were -- did he still have custody of his children?

6 A Yes.

7 Q He did. All right. So up until the time whenever the
8 children were referred to PCASA for their interview, were
9 they in DSS custody?

10 A No.

11 Q So he had access to his children?

12 A Yes. It was a safety plan -- against my better
13 judgment there was a safety plan put in place between
14 Heather Judd, Mr. Corlew's mom, Ms. Palmer, and he was not
15 to have any unsupervised visits but he was still in the
16 home.

17 Q And this -- was this despite what Sarah Lacy had told
18 in her interview?

19 A Yes.

20 Q So was he under arrest at that point prior to the
21 children's interviews?

22 A No.

23 Q So you go to the interviews. You said that you
24 reviewed them and they were actually audio and video
25 recorded, correct?

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1 A Yes.

2 Q So between the time that -- at the time of his
3 children's interviews, Defendant Corlew's children's
4 interviews, what happened to his children after the
5 interviews that happened on September -- I think it was
6 about September the 12th of 2019?

7 A Due to the statements during his children's interview
8 his children were also EPC'd at that time, placed into
9 emergency protective custody with DSS. DSS was called to
10 the scene to PCASA and was advised they were being placed in
11 emergency protective custody based off of the forensic
12 interviews of his children, and Heather Judd and Ms. Palmer
13 were notified because they were there present during those
14 interviews, they were notified at that time.

15 Q So at that point was Mr. Corlew allowed any contact
16 with his children?

17 A No, ma'am.

18 Q After Corlew and Lacy were arrested on September 16th,
19 2019, did you continue to have any type of role in what was
20 going on with the children in this case?

21 A Just making sure things were provided for them
22 financially, making sure they had clothes and were enrolled
23 in school.

24 Q And was there any updates in regards to Minor 1
25 Mr. Corlew's oldest daughter, during that time after he was

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1 arrested?

2 A Yes. Got a disturbing email back in September, I'm not
3 sure the correct date, but it was September of 2019, got an
4 email from DSS stating that Minor 1 made some statements to
5 her foster mom and that she --

6 MR. FRICK: Objection to hearsay, Your Honor.

7 Q Don't tell me --

8 THE COURT: Sustained.

9 Q Don't tell me what was said, but based upon that email
10 what ended up happening in regards to Minor 1

11 A Another interview took place.

12 Q Another interview took place.

13 A Uh-huh.

14 Q Did you get the chance to watch that one?

15 A I did.

16 Q And was that one performed at Palmetto CASA as well?

17 A It was.

18 Q Was it the same interviewer?

19 A Yes.

20 Q Do you happen to know the date of that follow-up
21 interview with Minor 1

22 A Approximately September the 25th, 2019.

23 Q And the first one you've already said was September the
24 12th of 2019.

25 A Correct.

KEESHA TOBIAS - CROSS

1 Q After that particular interview, was there anything
2 additional that you did other than just maybe following up
3 with the care of the children?

4 A Nothing additional. Just making sure that the children
5 were taken care of because they became the victims of these
6 crimes.

7 MS. LIVELY: Thank you. Answer any questions the
8 defense may have.

9 THE COURT: Mr. Frick, your witness.

10 MR. FRICK: Thank you, Your Honor.

11 CROSS EXAMINATION

12 BY MR. FRICK:

13 Q Ms. Tobias, was this report originally made in Rock
14 Hill?

15 A Yes.

16 Q Do you know the day of that?

17 A I do not.

18 Q Did you get an incident report from Rock Hill?

19 A I did not get a report from Rock Hill. One of our
20 local -- one of our investigators did, I didn't receive the
21 report.

22 Q But you didn't hear anything about that until the 23rd,
23 correct?

24 A Correct.

25 Q Okay. Would it be fair to say that she reported it in

KEESHA TOBIAS - CROSS

1 Rock Hill earlier than that?

2 A Possible.

3 Q Okay. Now, you testified that she said that the abuse
4 occurred that day. Did she not say it was over a period of
5 time?

6 A She did not.

7 Q She did not?

8 A She did not.

9 Q Okay. So if the incident report says it was, would
10 that be incorrect?

11 A I'm not sure.

12 Q Okay. Because you weren't part of that, correct?

13 A I was not part of Rock Hill's report.

14 Q Well, I'm talking about the Chester City.

15 A I was a part of Chester City's report.

16 Q Okay. She didn't say anything about it starting in
17 December and the last time was about a month before this
18 interview?

19 A I'm not sure. She might have made statements to that
20 concerning that, but at this moment I am not aware.

21 Q Okay. Because you didn't write that part of the
22 incident. You weren't the investigator on the case.

23 A Correct.

24 Q You're the victim advocate in the case.

25 A Correct.

KEESHA TOBIAS - CROSS

1 Q Your idea is "I've got a victim, I need to take care of
2 them," correct?

3 A Correct.

4 Q And then you had issues with children, correct?

5 A Correct.

6 Q And you wanted to make sure the children were safe.

7 A That is correct.

8 Q So as far as any facts in the case that wasn't your
9 department in this case, correct?

10 A Correct.

11 Q Okay. Now, you did end up getting involved because
12 Ms. Lacy kept coming back to the police department, right?

13 A Correct.

14 Q Came back and talked to y'all at least four times.

15 A Correct.

16 Q Did she talk to you any other times?

17 A Possibly. She was there probably a lot.

18 Q Do you recall if she gave you any phone calls?

19 A She may have.

20 Q Okay. You don't know specifically?

21 A No, I don't know specifically.

22 Q But it's possible.

23 A It's possible.

24 Q She was quite forthcoming with information.

25 A Yes, sir.

KEESHA TOBIAS - CROSS

1 Q Okay. And just to be on the safe side every time she
2 walked in the door y'all gave her a Miranda form.

3 A Yes, sir.

4 Q Okay. You said the interview on the 23rd was audio and
5 videotaped?

6 A Yes.

7 Q Okay. Now, the one on the 16th, September 16th, I'm
8 sorry, that was audio/videotaped as well, correct?

9 A I'm not sure. I was not involved in the actual
10 videoing of it, just that she was read her Miranda.

11 Q Got you. Okay. All right. How about when she came in
12 on the 26th, anything recorded on that? Anything written?

13 A Just the Miranda given by Lieutenant Sanders. Again, I
14 was present because at that time she's still the victim of
15 domestic violence.

16 Q And then going back to what's marked State's ID Number
17 8, this rather lengthy document that was her statement, she
18 had this to take home, correct?

19 A She did, she took it home. Because she said it would
20 take her awhile to fill it out and get everything and get
21 her thoughts together.

22 Q And so when they brought it back to you it was this
23 document, correct?

24 A Yes.

25 Q And you handed it to her -- what date did you give it

KEESHA TOBIAS - CROSS

1 to her?

2 A August 23rd at 2:23 p.m.

3 Q Okay. And when did it come back to you?

4 A August 29th, 2019.

5 Q Six days, right?

6 A That's correct.

7 Q Okay. To go home and write this.

8 A Correct.

9 Q Okay. And you said her children were EPC'd, emergency
10 protective custody, correct?

11 A On the 23rd.

12 Q DSS got involved, correct?

13 A Yes.

14 Q On the 23rd.

15 A Yes.

16 Q When did you say Mr. Corlew's children got EPC'd?

17 A I'm not sure the exact date, but it is the date of our
18 interviews, which would have been September 19th. I'm
19 sorry, September 12th.

20 Q Okay. I thought you said the 12th.

21 A The 12th.

22 Q I know it's a lot of dates --

23 A It is.

24 Q -- and it was confusing because there was a lot of
25 kids.

KEESHA TOBIAS - CROSS

1 A September 12th is when we had our interview.

2 Q Okay. And you said you didn't know where Mr. Corlew
3 was.

4 A No, sir.

5 Q Okay. And before you set up an interview, don't you
6 have a form you've got to fill out?

7 A You do.

8 Q Okay. And you've got to have the names and address of
9 the children, correct?

10 A Correct.

11 Q I'm going to show you what is marked as Defendants ID
12 Number 1.

13 A Uh-huh.

14 Q Do you recognize what that document is in general? Not
15 specifically.

16 A Yes.

17 Q What is that?

18 A That is our scheduled forensic checklist that we submit
19 to PCASA anytime we want a child interviewed.

20 Q All right. I'm going to ask a dangerous question, is
21 that your handwriting?

22 A Yes, it is.

23 Q Okay. Good. I didn't know the answer and you're not
24 supposed to do that. All right. So you filled out these
25 forms.

KEESHA TOBIAS - CROSS

1 A Yes.

2 Q Can you tell me just looking through them whose
3 children those were?

4 A Bradley Corlew.

5 Q Okay. And on that, do you have a name and address and
6 contact information for Mr. Corlew?

7 A I do.

8 Q Okay. If you couldn't get in contact with him, how did
9 you get contact information?

10 A Sarah provided those information to us.

11 Q Okay. And he's the contact person?

12 A Yes, he is their father.

13 Q All right. Do you have -- because I don't -- is there
14 date on any of that? I don't see one.

15 A No. They don't have a date of submission.

16 Q Okay. That's fine. So you collect this information
17 and then you send it on to PCASA, right?

18 A Yes.

19 Q And they scheduled the interview.

20 A Yes.

21 Q And they scheduled it for Brad's children, the Corlew
22 children, for September 12th.

23 A Uh-huh.

24 Q Okay. So you said you got all of that information from
25 Sarah?

KEESHA TOBIAS - CROSS

1 A Yes.

2 Q Okay. All right. You mentioned something about a
3 safety plan being in place --

4 A Uh-huh.

5 Q -- with the Corlew children?

6 A Yes.

7 Q When did that go into place?

8 A I am not sure, DSS put that in place.

9 Q But it was before the interview.

10 A That's correct.

11 Q Okay. And you said part it was he was to have no
12 unsupervised -- Brad was to have no unsupervised contact
13 with his children.

14 A Correct.

15 Q All right. Was that a court order?

16 A Not that I'm aware of.

17 Q Well, who made this ruling then?

18 A DSS.

19 Q DSS did.

20 A Yes.

21 Q Okay. All right. So DSS came up with the safety plan
22 and you have no idea what happened with that plan, correct?

23 A That's correct.

24 Q Okay. All right. Ms. Tobias, let me check on one
25 thing.

KEESHA TOBIAS - REDIRECT

1 A Okay.

2 MR. FRICK: Thank you, ma'am, that's all of the
3 questions I have.

4 THE COURT: Redirect.

5 REDIRECT EXAMINATION

6 BY MS. LIVELY:

7 Q Ms. Tobias, who was in charge of finding Mr. Corlew?

8 A Investigators.

9 Q So that's not your job.

10 A Not my job.

11 Q And were you -- did you become aware of them actually
12 locating Mr. Corlew?

13 A Yes. DSS and law enforcement connected with him.

14 Q And was Mr. Corlew actually interviewed as a result of
15 that by law enforcement?

16 A Yes.

17 MS. LIVELY: Okay. Thank you. No further questions.

18 MR. FRICK: Nothing further.

19 THE COURT: All right. Thank you, ma'am, you may step
20 down, you are free to leave. The State can call its next
21 witness.

22 MS. EASLER: State calls Trevor Smalls.

23 MR. FRICK: Your Honor, before we begin I think I have
24 a matter of law we need to take up outside of the presence
25 of the jury.

KEESHA TOBIAS - REDIRECT

1 have an objection under 801D1D.

2 THE COURT: Hang on. 801 -- I used to know these off
3 the top of my head. 801D -- yeah. 801D1 -- "consistent
4 with the declarant's testimony in a criminal sexual conduct
5 case where the declarant was the alleged victim." Okay.

6 MR. FRICK: My argument goes beyond time and place.
7 They're saying that **Minor 1** says specific X, names the
8 defendant and it goes beyond the time and place exception
9 that that rule allows.

10 THE COURT: All right. Well -- all right. So you're
11 saying that prior statement by a witness is hearsay.

12 MR. FRICK: Yes, sir.

13 THE COURT: You want to argue that?

14 MS. EASLER: Your Honor, we're not actually putting the
15 interview -- or the email in to prove the truth of the
16 matter asserted, we're putting it in for the purposes to
17 show that the email is what led to the follow-up interview.

18 THE COURT: Oh, okay. I understand. Anything else on
19 that?

20 MR. FRICK: Yeah. It says, "**Minor 1** stated," that's --

21 MS. EASLER: We can redact that, Your Honor.

22 THE COURT: Okay. Well, right now y'all are asking for
23 an advisory ruling, it hadn't been offered yet, so y'all get
24 it straight and then I'll issue a definitive ruling then.
25 But right now this witness can't testify as to that email

KEESHA TOBIAS - REDIRECT

1 because it's not in his official case file and it wasn't
2 addressed to him. Okay? So if y'all figure out where that
3 is then we'll address the issue of whether it's coming in or
4 not. Okay?

5 MR. FRICK: Thank you, Your Honor.

6 THE COURT: All right. Thank you. All right.

7 Anything else before we bring the jury back?

8 MR. FRICK: No, sir.

9 THE COURT: All right. Bring them back.

10 (The jury returned to the courtroom.)

11 THE COURT: I apologize for the interruption. Mr.

12 Witness, if you will stand up and raise your right hand.

13 The witness, TREVOR SMALLS, was first duly sworn and

14 Testified as follows:

15 THE COURT: All right. Madam Solicitor, your witness.

16 Pull that microphone to you, sir.

17 MS. EASLER: Thank you, Your Honor.

18 DIRECT EXAMINATION

19 BY MS. EASLER:

20 Q Can you state your name for the record?

21 A Trevor Smalls.

22 Q What is your job title?

23 A I am a family preservation supervisor at the Department
24 of Social Services in Chester.

25 Q How long have you been with DSS?

TREVOR SMALLS - DIRECT

- 1 A Six years.
- 2 Q What are your specific duties?
- 3 A We investigate child abuse and neglect.
- 4 Q Are you in investigations?
- 5 A Yes.
- 6 Q Do you do home visits?
- 7 A We do.
- 8 Q When you do home visits, do you document who you speak
9 to?
- 10 A We do.
- 11 Q Is your documentation reported in a system with DSS?
- 12 A Yes, it's called Case Dictation.
- 13 Q Did you document the investigation work you did
14 involving Sarah Lacy and Bradley Corlew?
- 15 A We did.
- 16 Q When did your investigation begin?
- 17 A The agency initiated its investigation on August 23rd
18 of 2019.
- 19 Q Who did you speak to first in regards to this
20 investigation?
- 21 A Ms. Sarah Lacy.
- 22 Q How many children did Ms. Lacy -- or how many children
23 did you investigate total?
- 24 A There was a total of nine children.
- 25 Q Were all of the children Sarah's?

TREVOR SMALLS - DIRECT

1 A No. Sarah had four of her own biological children and
2 Mr. Bradley Corlew had five biological children.

3 Q Did Sarah and Brad have any biological children
4 together?

5 A They did not.

6 Q Were they married?

7 A They were not.

8 Q At the time that you started your investigation, can
9 you tell the jury the names and ages of Sarah's children?

10 A Yes. Sarah's oldest child's name was Minor 2 and
11 there was Shawn L. Bailey L. and Emma L.

12 Q What were the names and ages of the defendant's
13 children?

14 A Mr. Corlew had Minor 1 who was 11 years old at
15 the time; Bradley C. who was ten; Elaina C.
16 who was seven; he had Paigely C.
17 who was three at the time; and Reagan C.
18 who was two.

19 Q At the time you interviewed Sarah, what kind of abuse
20 did she disclose to you in regards to the children?

21 A Sarah, she spoke about allegations of domestic
22 violence, physical abuse along with sexual abuse. She spoke
23 about threats of harm towards the children and isolation of
24 the children.

25 Q What, if any, concerns did you have regarding Sarah's

TREVOR SMALLS - DIRECT

1 daughter, Minor 2

2 A The agency was concerned that the child did have some
3 medical needs at the time. She was a severe diabetic, and
4 she was also diagnosed with cerebral palsy.

5 Q When you met with Sarah, what was her demeanor?

6 A Ms. Lacy was very emotional and distraught.

7 Q Did she ever tell you how she felt living with the
8 defendant?

9 A She did. She specified at the time --

10 MR. FRICK: Objection to hearsay.

11 THE COURT: Sustained.

12 A She did --

13 THE COURT: Don't answer.

14 Q Was she working at the time she was with Corlew?

15 A She was not.

16 Q Where was her family?

17 A Her family was residing in the State of Florida.

18 Q Did she have any friends?

19 A Not that the agency was aware of.

20 Q On the day you met Sarah, what happened to her
21 children?

22 A Given the circumstances surrounding the allegations and
23 the nature of those allegations, law enforcement believed
24 that the children at the time were in imminent danger, and
25 so the children were brought into emergency protective

TREVOR SMALLS - DIRECT

1 custody and then placed into foster care.

2 Q Can you tell the jury what emergency protective custody
3 actually means?

4 A Yes. It's when the children are in imminent and
5 substantial danger and law enforcement executes an EPC, and
6 those children are brought into the State's custody.

7 Q At the time was it only Sarah Lacy's four children that
8 were taken into emergency protective custody?

9 A Yes.

10 Q Where were the defendant's children?

11 A At the time the agency did not know the whereabouts of
12 Mr. Bradley Corlew nor his children.

13 Q Where had Sarah and the defendant last lived together?

14 A They resided together at Ella Street in Chester.

15 Q Was he still living in the house with his kids?

16 A He was not.

17 Q Was there any prior DSS history involving the defendant
18 and Sarah and their kids?

19 A There was a prior case, and that case dated back to
20 November of 2018. In it there were allegations of issues
21 with bed bugs and possible a scabies outbreak among the
22 children.

23 Q Were they living at Ella Street?

24 A They were.

25 Q So you have documentation that the defendant and Sarah

TREVOR SMALLS - DIRECT

1 were living in Chester with their nine children in November
2 of 2018?

3 A Yes.

4 Q What happened in that case?

5 A It was closed out.

6 Q So the next DSS involvement was this current case?

7 A Yes, ma'am.

8 Q After the first meeting with Sarah, when were you
9 finally able to make contact with the Defendant Corlew?

10 A The agency made contact with Mr. Corlew on
11 September 6th, 2019. Mr. Corlew and his minor children were
12 residing at 1759 Manor Court -- Manor Oak, I'm sorry, Drive
13 in Chester. He was residing there with his paramour at the
14 time, Ms. Heather Judd, and her children.

15 Q What action did DSS take at this point after making
16 contact with the defendant and his five children?

17 A The agency did implement a safety plan, it was an out
18 of home safety plan. In it we specified that Mr. Bradley
19 Corlew was to have supervised contact with his children, and
20 his children were then placed with his mother, the paternal
21 grandmother, on that same day.

22 Q So he was allowed to have contact but --

23 A Yes. He was allowed to have contact but it had to be
24 supervised.

25 Q Can you tell the jury what that means?

TREVOR SMALLS - DIRECT

1 A That means that any type of contact that Mr. Bradley
2 Corlew would have had with the children, the protector, Ms.
3 Laura Palmer, the paternal grandmother, was to be
4 supervising that contact, i.e., a telephone contact, an
5 in-person visit and things of that nature.

6 Q Can you tell the jury what a protector is?

7 A A protector is someone that the agency identifies as
8 able to protect the child, someone that in turn has a clear
9 background, someone that is intellectually and behaviorally
10 able to protect the child from any hurt, harm or danger.

11 Q Was he under arrest at that point?

12 A He was not.

13 Q Was he allowed to stay at the home with the five
14 children as long as he was supervised?

15 A He was to be supervised, yes, ma'am.

16 Q What was the next step on the process of the
17 investigation?

18 A The agency at that point in the investigation
19 coordinated with law enforcement and Palmetto Citizens
20 Against Sexual Assault to coordinate a forensic interview
21 for the minor children.

22 Q When were the forensic interviews done?

23 A It was scheduled for September the 12th of 2019.

24 Q After the forensic interviews were finished, did the
25 placement of any children change?

TREVOR SMALLS - DIRECT

1 A It did. The Corlew children at the time of that
2 forensic interview based on the disclosers and the things
3 that were provided in that interview, law enforcement at the
4 time believed that those children should not have any
5 contact with Mr. Bradley Corlew, and so the children at that
6 time were brought into emergency protective custody as well
7 and then entered foster care.

8 Q So at that point was Mr. Corlew allowed any contact
9 with his five children?

10 A He was not.

11 Q Over the next few days did you receive any updates
12 regarding any of the children in this case?

13 A Yes. The agency did receive an email from the minor
14 child, Minor1 Vaughn's, current foster parent --

15 MR. FRICK: Objection, Your Honor.

16 Q Overruled. You can answer.

17 A Yes, sir. And in it the current foster parent, she
18 specified that the child was opening up to her more --

19 MR. FRICK: Objection, hearsay.

20 THE COURT: Sustained on that. Just rephrase your
21 question, Madam Solicitor.

22 Q As a result of the email you received, did anything
23 happen in the course of the investigation?

24 A Yes. So after receiving the email update from the
25 current foster parent the agency did coordinate again with

TREVOR SMALLS - DIRECT

1 law enforcement to refer and schedule the child for a second
2 forensic interview.

3 Q Okay. What was the date of that interview?

4 A It was on August -- I'm sorry, September 23rd of 2019.

5 Q Did you attend that interview?

6 A I did not.

7 Q Where is Sarah's our kids now?

8 A Ms. Lacy's four kids are currently residing in the
9 State of Florida.

10 Q Where are the defendant's five kids now?

11 A Mr. Corlew's children are currently residing in the
12 State of South Carolina.

13 Q Have you had any further responsibilities in this case
14 other than assuring the kids' safety?

15 A I have not.

16 MS. EASLER: That's all of the questions I have for you
17 at this time. Please answer any the defense has.

18 THE COURT: All right. Mr. Frick?

19 CROSS EXAMINATION

20 BY MR. FRICK:

21 Q Do you know where Mr. Corlew is from? Isn't he from
22 Chester?

23 A From my understanding, yes, sir.

24 Q And isn't Ms. Lacy from Florida?

25 A Yes, sir, from the agency's understanding.

TREVOR SMALLS - CROSS

1 Q So they're with their family in their respective
2 states, correct?

3 A Yes.

4 Q Okay. You said you first talked with -- y'all started
5 on August 23rd when you got the call from the Chester Police
6 Department, correct?

7 A We started on August the 23rd, yes, sir.

8 Q Okay. And then you got in contact with Mr. Corlew on
9 September 6th, correct?

10 A Yes, sir.

11 Q Okay. And as a result of that contact you put a safety
12 plan in place, correct?

13 A We did.

14 Q And if you determined he violated that safety plan you
15 could take him to court, correct?

16 A Yes, sir.

17 Q Okay. And take further action, correct?

18 A Yes, sir.

19 Q Okay. Did y'all do that?

20 A We did not.

21 Q Okay. So -- and he was -- they were staying in
22 Chester. Did you meet with Mr. Corlew that day?

23 A On September 6th?

24 Q The 6th, yes.

25 A I did.

TREVOR SMALLS - CROSS

1 Q Okay. And you explained what the process was, correct?

2 A Yes.

3 Q All right. And then you told him about the safety
4 plan, correct?

5 A Yes, sir.

6 Q And supervised visitation means he couldn't be alone
7 with the minor children by himself, correct?

8 A Yes, sir.

9 Q Okay. All right. In the prior case you talked about
10 that occurred -- I can't remember exactly, it's not that
11 important, but you said it involved scabies and bed bugs?

12 A Yes, sir.

13 Q And you said that case was closed out.

14 A It was.

15 Q What does that mean? Y'all didn't take any action,
16 right?

17 A Yes.

18 MR. FRICK: Okay. Thank you. That's all the questions
19 I have.

20 MS. EASLER: Nothing redirect, Your Honor.

21 THE COURT: All right. Thank you, sir, you can step
22 down, you're free to leave. The State can call its next
23 witness.

24 MS. EASLER: The State calls Heather Judd.

25 THE COURT: Who?

HEATHER JUDD - DIRECT

1 MS. EASLER: Heather Judd.

2 The witness, HEATHER JUDD, was first duly sworn and

3 Testified as follows:

4 THE COURT: Have a seat there, and you may remove your
5 mask. Madam Solicitor?

6 MS. EASLER: Thank you, Your Honor.

7 DIRECT EXAMINATION

8 BY MS. EASLER:

9 Q Can you state your name for the record?

10 A Heather Judd.

11 Q Can you speak up a little.

12 A Heather Judd.

13 Q Where do you live, Heather?

14 A Chester, Manor Oak drive.

15 Q How long have you lived there?

16 A I've lived there for four years.

17 Q Are you employed?

18 A I am.

19 Q Where do you work?

20 A At the Chester County Detention Center.

21 Q How long have you worked there?

22 A Almost seven. Almost seven years.

23 Q Okay. Do you know the defendant in this case, Bradley
24 Corlew?

25 A I do.

HEATHER JUDD - DIRECT

1 Q How do you know him?

2 A We were married.

3 Q Are you related to him in any way?

4 A Other than marriage, no.

5 Q How long have you known him?

6 A In high school I knew him through mutual friends and a
7 acquaintances.

8 Q When was the first time he reconnected to you?

9 A Early June, 2019.

10 Q How did he reconnect to you?

11 A Through Facebook.

12 Q Were you in a relationship at the time he reached out
13 to you?

14 A I had just got out of a really abusive relationship at
15 the time, so no, I was not.

16 Q Do you have any children?

17 A I do.

18 Q How many?

19 A Three.

20 Q How old are they?

21 A Four, 11 and 13.

22 Q When you started talking to the defendant, did you know
23 that he had any children?

24 A I knew he had kids, yes.

25 Q Where was the defendant living with his children at the

HEATHER JUDD - DIRECT

1 time you reconnected with him?

2 A On Ella Street.

3 Q Were you aware of who all was living with him at that
4 home?

5 A At first I didn't know that Sarah stayed there. I knew
6 the kids stayed there.

7 Q When did you learn that Sarah was living there?

8 A A few weeks after we started talking, then he mentioned
9 to me that "By the way, my ex still lives there."

10 Q Did you know Sarah Lacy?

11 A I didn't.

12 Q How did the defendant describe his relationship with
13 Sarah when you first started talking to him?

14 A When I first started talking to him he described her
15 as, you know -- he wanted to help her. She didn't have
16 anywhere to go, that he didn't want to kick the kids out and
17 them have no place to go, so he was helping her. And that
18 he didn't have a babysitter, and so she would watch the kids
19 while he worked a lot.

20 Q Did your relationship progress and become more serious?

21 A It did. We talked a lot on the phone while he was
22 driving. That's what he did, he drove trucks.

23 Q At some point did you allow him and the children to
24 move in with you?

25 A The children started staying with me on and off while

HEATHER JUDD - DIRECT

1 he was working. They really bonded with me. And then after
2 a few more weeks they got an eviction notice on Ella Street
3 from what I understood, and so they went ahead and moved
4 their things into my house since Brad was gone most of the
5 time so I would keep the kids.

6 Q Why did you feel so comfortable having him move in so
7 soon?

8 A Everything that he portrayed was perfect to me, you
9 know. He painted himself to be a great person, a good
10 father.

11 Q About how long had y'all been talking at this point
12 when he moved in?

13 A Whenever he moved in about a month and a half.

14 Q Did you help him move out of the Ella Street house?

15 A I didn't. I offered to and he told me no.

16 Q Did you ever go into the Ella Street house?

17 A I walked in there once.

18 Q How would you describe it?

19 A It was terrible. You couldn't see a spot on the floor
20 at all. It was clothes, just mess everywhere.

21 Q When the defendant was working, did you watch the kids?

22 A I did.

23 Q In the beginning if you both had to watch the kids,
24 meaning if you or the defendant both had to work at the same
25 time, who would watch the kids?

HEATHER JUDD - DIRECT

1 A My family would watch my children and he would tell me
2 to drop them off with Sarah, his children. So I dropped
3 them off with Sarah and she would watch them while we were
4 both working.

5 Q Whose idea was it to allow his children to be watched
6 by Sarah?

7 A Brad's.

8 Q How did his children react when you left them with
9 Sarah?

10 A They cried. They didn't want to go. They said they
11 hated Sarah. They didn't want to be over there, they wanted
12 to stay with me, but I didn't really have a choice at the
13 time.

14 Q Did the kids ever tell you why they didn't want to stay
15 with Sarah?

16 A At first they --

17 MR. FRICK: Objection to hearsay.

18 THE COURT: Sustained.

19 Q Were you aware that on August 29th, 2019, Brad went in
20 for an interview with law enforcement?

21 A I was.

22 Q Did he tell you what he told law enforcement when he
23 was interviewed by them on August 29th of 2019?

24 A He didn't say a whole lot about it --

25 MR. FRICK: Objection, hearsay.

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1 THE COURT: That's overruled.

2 A He didn't tell me a whole lot about the interview. He
3 was just kind of distant and didn't want to speak about it,
4 but he said Sarah was making up a whole lot of lies on him,
5 that he was -- he just didn't know what to do, that Sarah
6 was going to cause him to get arrested and that he was
7 scared.

8 Q Was there a time when he told you what Sarah had done
9 to the kids?

10 A They had told me that she had hit Minor 1 --

11 MR. FRICK: Judge --

12 THE COURT: Hang on, ma'am. Listen to the question.
13 I'm going to sustain the objection. Repeat your question,
14 Madam Solicitor.

15 Q Was there a time when he told you what Sarah had done
16 to the kids?

17 THE COURT: All right. You can answer that question.
18 He being who?

19 MS. EASLER: The defendant.

20 THE COURT: Okay.

21 A Brad had told me that Sarah had punched Minor 1 at one
22 point. He also told me that she had pulled Elaina's
23 (phonetically) hair out at one point. Yes.

24 Q Did he ever tell you about any sexual abuse, he being
25 the defendant?

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1 A He did not.

2 Q Did the defendant ever tell you he knew about what was
3 going on, what she was doing to the kids?

4 A He said that he knew that she was being mean to them
5 but he didn't have anybody else to help with the kids with
6 babysitting. He didn't have a way out, that he didn't
7 have -- his parents wouldn't watch the kids. He had no
8 family, no one to babysit for him, so he had no choice.

9 Q Did the defendant explain to you why he didn't leave
10 sooner?

11 A Sarah -- he said that he didn't want her -- she would
12 have nowhere to go, that he didn't want to kick her and her
13 kids out on the street, that he needed to be able to take
14 care of them and not just throw them out.

15 Q Did the defendant tell you that he knew Sarah had gone
16 to the police and reported him?

17 A He did.

18 Q What exactly did he tell you?

19 MR. FRICK: Objection, Your Honor.

20 Q The defendant. What exactly did the defendant tell
21 you?

22 MR. FRICK: It's still hearsay.

23 THE COURT: Objection overruled.

24 A He told me that Sarah had went to the police and that
25 she was making up all of these lies on him, that she said

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1 that he was abusing her and the kids and hitting on them,
2 and he said he would never lay a hand on his kids and that I
3 knew that.

4 Q Was the defendant worried about it?

5 A He was really worried about it.

6 Q How did the defendant react to the fact that you worked
7 at the sheriff's office?

8 A He liked the fact that I worked at the sheriff's
9 office. He used to tell me, "Well, you can tell them that
10 I'm not a monster. You can tell them that I'm not a bad
11 person."

12 Q When did the defendant ask you to marry him?

13 A August 30th, 2019.

14 Q What was your answer?

15 A I said yeah. We were -- he was really worried about
16 what would happen to the kids if something happened to him.

17 Q Where did you go?

18 A We went to Gatlinburg, Tennessee.

19 Q Who all went with you to elope?

20 A Myself, Brad, and all the kids.

21 Q How long were you gone?

22 A We were gone -- we left the 30th, we were married the
23 31st, and we came back on the 1st.

24 Q Did any of the kids start calling you mom at any point?

25 A They did, the younger ones did.

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1 Q What about Minor 1

2 A Minor 1 really bonded with me, really connected with
3 me.

4 Q How was Brad when he returned from Tennessee?

5 A When we got back he was still really nervous. He was
6 really -- he said he wanted to be alone, he was going to go
7 live in his truck. So he took his stuff and he said he
8 didn't want to be around and cause anymore problems, so he
9 went and moved into his truck. He was really distant,
10 didn't say much after that.

11 THE COURT: Ma'am, you're going to have to speak up.
12 Okay?

13 THE WITNESS: Okay. Sorry.

14 Q What, if anything, did he tell you he was concerned
15 about when you both returned?

16 A He was worried that Sarah was going to cause him to get
17 arrested, that she was doing nothing but lying on him, that
18 she was making up all of this stuff, and that he just knew
19 that nobody was going to hear his side of the story, no one
20 was going to believe him.

21 Q Why was he concerned about what Sarah was saying?

22 A He was concerned I would say because it was -- those
23 were major, you know, major accusals.

24 Q What did he do after he told you about his concerns and
25 fears?

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1 A Can you repeat that?

2 Q What did he do after he told you about his concerns and
3 fears?

4 A That's when he was still -- he was still living out of
5 his truck. That's when he moved out, he didn't want to be
6 around us to cause any problems.

7 Q Did he leave at any point?

8 A Did he leave?

9 Q Yeah.

10 A He was in Columbia living in his truck.

11 Q Did he go and meet anyone while he was living in his
12 truck?

13 A That was later on.

14 Q Can you tell me about when that was?

15 A When he left the second time he went with Sarah. He
16 said he was going to go get his own proof and his own
17 evidence that she was lying on him.

18 Q And can you tell me about what date that was?

19 A That was after the DSS interview, I'm not sure of the
20 exact date.

21 Q Okay. Do you know how long he was gone?

22 A He was gone until he came back the day he got arrested
23 to my knowledge.

24 Q While he was gone did he post something that gave you
25 concern?

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1 A When he was gone he had talked about killing himself
2 quite a few times. His ex-wife, she had passed, he would
3 say things like, "I just want to go be with her," you know,
4 "I would be better off if I wasn't here." And then he made
5 a post on Facebook, pretty much his farewell post with
6 everybody.

7 Q Did he end up in the hospital?

8 A He did. He was committed to the hospital for an
9 evaluation.

10 Q Did the defendant ever tell you another story about why
11 he supposedly was going to kill himself?

12 A He said that he was either going to kill himself or go
13 on the run until all of this stuff with Sarah fizzled out.

14 Q Did the defendant have more than one cell phone?

15 A He had a lot of cell phones.

16 Q What did he do with them?

17 A I know of one that he turned into the thing, the
18 collection bin at Wal-Mart where you can trade it in for
19 money. It was like a newer I-phone, he said he needed the
20 cash. The other ones I don't know what all happened to
21 them. I know he turned like two over.

22 Q After DSS came by your house on 9/6 of 2019, what did
23 Brad do?

24 A That's when he left with Sarah. I came home -- I'm not
25 sure if I worked that night or the next night, but when I

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1 came home from work he was just gone.

2 Q How do you know who he was with?

3 A He had called me off of a number -- a random number and

4 he -- I answered, he was like, "Hey. You're not going to

5 like this but I'm with Sarah. Just believe me, I'm trying

6 to get my evidence to prove that she's lying. It will all

7 make sense soon." And then he sent me pictures. And also

8 on my Xbox at home his account was signed in and you could

9 see the -- it was like a chat, you could read the

10 conversation between him and Sarah.

11 Q Let me show you what has been marked as State's

12 Exhibit 3.

13 THE JUROR: Your Honor, may I approach the witness?

14 THE COURT: Yes.

15 Q Do you recognize this?

16 A Yes.

17 Q What is it?

18 A These are the screen shots from the Xbox. This is

19 their conversation.

20 Q What is it detailing?

21 A It says, "I wish you would have a conversation --

22 MR. FRICK: It hadn't been moved into evidence yet,

23 Your Honor.

24 MS. EASLER: The State moves State's Exhibit 3 into

25 evidence.

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1 THE COURT: Any objection?

2 MR. FRICK: I don't think they've been authenticated
3 under 901.

4 THE COURT: All right. Why don't you lay a proper
5 foundation and then I'll rule on it.

6 Q Did those pictures come off your Xbox?

7 A Yes, they did.

8 Q How did you document it?

9 A I took a picture of them.

10 Q On your phone?

11 A On my phone, yes, ma'am.

12 MS. EASLER: The State moves State's Exhibit 3 into
13 evidence.

14 MR. FRICK: Same objection, Your Honor.

15 THE COURT: All right. Objection overruled, admitted
16 into evidence.

17 (The photos were received as State's 3.)

18 Q Can you tell the State what -- or can you tell the jury
19 what that's detailing?

20 A It's a conversation between Brad and Sarah asking where
21 you are. It says he's been trying to help and tell her
22 things, not trying to fight, just trying to work with her.
23 They're trying to connect. They were sending numbers back
24 and forth. And also it was telling that they had her kids
25 and he said, "They have mine too now." And it was the road

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1 where he was at where she picked him up from and said, "Look
2 for the van."

3 Q So what was the purpose of him going with Sarah?

4 MR. FRICK: Objection to speculation.

5 MS. EASLER: Sustained.

6 Q He called you and told you what?

7 A That he was trying to get his own evidence and proof
8 that Sarah was lying.

9 Q At any point did you receive a picture?

10 A I did.

11 Q What was the picture of?

12 A Of Sarah.

13 Q Who sent you that picture?

14 A Bradley.

15 MS. EASLER: May the State approach the witness?

16 THE COURT: Yeah.

17 Q I'm going to show you what's marked as State's Exhibit
18 5. Do you recognize that picture?

19 A Yeah, I do.

20 Q Is that an accurate depiction of what the defendant
21 sent you?

22 A That's one of the pictures he sent me, yeah.

23 THE COURT: You've got to speak up, ma'am.

24 A That's one of the pictures he sent me, yes.

25 Q Can you tell the jury what that's a picture of?

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1 A This is a picture of Sarah driving. I guess he was
2 sitting beside her when he snapped the picture.

3 THE COURT: You move that in?

4 MS. EASLER: The State moves State's Exhibit 5 into
5 evidence.

6 THE COURT: Any objection?

7 MR. FRICK: No objection.

8 THE COURT: Introduced.

9 (The photo was received as State's 5.)

10 Q I'm going to take you back for a few minutes. After
11 DSS comes by your house, were the kids set up for interviews
12 at PCASA in Lancaster?

13 A They were. They were already placed with the
14 grandmother at the time when they were set up with the
15 interviews.

16 Q Who took the children to the interviews?

17 A Myself and Laura, the children's grandmother.

18 Q Did you stay with the kids the whole time?

19 A I did.

20 Q What did you tell the kids to say after the interviews?

21 A I told them to tell the truth, tell them everything
22 that they've told me about what Sarah has done, because they
23 started opening up to me a little bit. I told them to make
24 sure that they were just honest.

25 Q After the defendant left with Sarah, when did he come

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1 back?

2 A The day he was arrested, the 16th.

3 Q What day was it that he got back?

4 A That was the 16th, I believe.

5 Q September 16th of 2019?

6 A Correct, yes, ma'am.

7 Q Do you know what happened when he got back?

8 A He said that Sarah had dropped him off, he came in the
9 house, he took a shower, and then I dropped him off at city
10 hall.

11 Q After he was arrested, did you hear from him at all?

12 A He started writing letters everyday, then they kind of
13 just stopped after awhile.

14 Q I'm going to show you what has been marked as State's
15 Exhibit 9. Is this one of the letters Mr. Corlew wrote to
16 you?

17 A Yes, it is.

18 Q Is that an accurate depiction of it?

19 A Yes.

20 MS. EASLER: The State moves into evidence State's
21 evidence (sic) 9.

22 MR. FRICK: No proper foundation under 901, Judge.

23 THE COURT: All right. Lay another foundation and I
24 can rule on it.

25 Q Was that letter sent to your address?

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1 A Yes, ma'am, it was.

2 Q It was sent to you?

3 A Yes.

4 Q Was it signed by defendant?

5 A Yes, ma'am.

6 MS. EASLER: The State moves State's Exhibit 9 into
7 evidence.

8 THE COURT: Objection noted, overruled.

9 MR. FRICK: Thank you, Your Honor.

10 (The letter was received as State's 9.)

11 Q Now, Ms. Judd, I'm going to have you read portions of
12 the letter. Can you tell me what date that letter is dated?

13 A I can't read the postmark, but it's October of 2019.

14 Q Okay. Can you read --

15 MS. EASLER: May I approach, Your Honor?

16 THE COURT: Yes.

17 Q It's right here to about right here.

18 THE COURT: What page are you referring to?

19 MS. EASLER: It's page one, Your Honor.

20 THE COURT: Page one about a third of the way down.

21 MS. EASLER: It's the fourth line, second sentence.

22 THE COURT: All right, ma'am, you can go ahead and read
23 it.

24 A "Please don't lose faith in me. I am not a monster. I
25 am a good daddy. You've seen how I am. What you've seen is

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1 the real me. I treat my kids good and I spoil them. She
2 was the one doing all the foul shit. I really was trying to
3 leave for a long time, I just didn't have a way out. Please
4 don't hate me."

5 Q Can you flip to the second page for me?

6 A (Witness complies.)

7 Q It's almost to the bottom of the page.

8 A That line says, "I assure you that I'm not a monster, I
9 assure you of that."

10 Q Can you just keep reading?

11 A Uh-huh. "My lawyer is William Frick, you can talk to
12 them if you want. Please put money on my books. If you
13 don't want to talk to me or anything at least do that for
14 me, please. I'm not going to write you anymore after this
15 unless you write me first and let me know you want to talk
16 to me. Please help me, baby, I am a victim just like the
17 kids are. You have to believe that, please. If no one else
18 believes it I want you to. I want you to believe in me. I
19 tried to do the right thing. Wish you could get victim's
20 advocate to help me. She would hurt the kids anytime I
21 didn't give her what she wanted. I want to explain
22 everything in detail but would like some help first. Just
23 know that I'm not a monster, you seen that, you were there
24 firsthand. You seen that I got the kids away from her and
25 didn't take them back. You seen how I treated the kids. We

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1 were there for two months, how many times did you see me
2 hurt my kids or even raise my voice at them? If I liked the
3 shit Sarah was doing I would have just continued to stay. I
4 wouldn't have left her and got the kids away from it.
5 Please trust me. I love you. When I got with you I really
6 was just wanting you. I wanted you the whole time. I will
7 explain everything when you write back. I do love you, boo
8 thing. Please put the 2,000 on my books. I hope to hear
9 from you. Please -- I love you. Please forgive me and have
10 my back and believe in me. And if you don't want to talk to
11 me then send me your number so I can call you. Please put
12 the money on my books, though. I love you very much. All
13 of the feelings I said to you were real, everything I said I
14 wanted with you was real. I do love you very much. I have
15 family court October 16th in Chester, you should come.
16 Please don't hate me. I love you, baby. Love, Brad."
17 That's it.

18 Q Thank you. Now, did you receive another letter from
19 Brad?

20 A Yeah. I received multiple letters.

21 MS. EASLER: May I approach, Your Honor?

22 THE COURT: Yeah.

23 Q Can you tell us what that is?

24 A This is another letter.

25 Q Is it addressed to you?

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1 A It is.

2 Q Was it sent to your house?

3 A Yes.

4 Q Was it signed by defendant?

5 A Yes, ma'am.

6 MS. EASLER: The State moves to enter State's Exhibit
7 10 into evidence.

8 THE COURT: Any objection?

9 MR. FRICK: Same objection under 901.

10 THE COURT: All right. Objection overruled.

11 (The letter was received as State's 10.)

12 Q Can you tell us the date of that letter?

13 A This was October 17th, 2019.

14 Q And did the defendant send you that letter as well?

15 A Yes, ma'am.

16 Q Can you read that letter for us in its entirety?

17 A "To my dearest Heather. Hey, beautiful, I seen you in
18 court today. You look so good. I really do love you. Not
19 a moment has went by that I haven't thought of you. It
20 broke my heart when you told them that you were done with me
21 and had no intentions of getting back with me. I think
22 that's some of the worst words I've ever heard in my life.
23 I'm really sorry about all of this. I never meant for it to
24 go down this way. Everything I told you at the beginning
25 was true. You were my saving grace. I am not a monster, I

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1 was just with one. I wish you would believe me. I'm a
2 great daddy. Everything has just got out of proportion and
3 no one sees the truth. You seen how I was for two months
4 before all of this happened. I treated you and the kids
5 very well. I thought you were going to have my back in all
6 of this. You were my sunshine in a thunderstorm. I do love
7 you with all my heart. I never meant to hurt you. I only
8 wanted to have a great relationship with you and be a good
9 man to you and our kids. Listen, I want to tell you some
10 truth about shit. When I first got with you I had every
11 intention of being with only you. Sarah left and went to a
12 hotel in Columbia and I didn't care. I was happy she was
13 going. It broke my heart she was taking the kids but still
14 I didn't care. I had you and my way out. I didn't just
15 choose you as a way out either so don't think that, I
16 genuinely wanted to be with you. Anyway, Sarah called me
17 and said her parents wouldn't help her while she was at the
18 hotel, so being me with a big heart I told her to go back to
19 the house and I would help her. Well, that's all I planned
20 to do. I told her that all I would do was help her, that I
21 wouldn't fuck with her because I didn't want to do that to
22 you. Well, she got mad and said she wouldn't let me see the
23 kids so I broke. I had the best intentions for everything.
24 So I want to tell you some shit about mine and Sarah's
25 relationship. I hated her abusing the kids. I was always

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1 trying to find a way out, that's no joke. I broke up with
2 her in December because I met a girl named Skyler. I
3 thought me and her was going to pursue a relationship but
4 she changed her mind and she didn't want to leave her
5 trailer in the country or quit her job or help find a
6 sitter, so I had to get Sarah to come back. She went all
7 the way to Florida and I didn't cave until I needed help
8 again, then I told her to come back. Then just about every
9 month I was looking for a sitter. I posted it on Facebook
10 and I even talked with Stacy Patterson about doing it, you
11 can ask her, she will confirm it, she said she can't. Well,
12 she said she could but not on the schedule I needed so that
13 was a fail. I left her in April because she punched
14 **Minor 1** in the face and shit but had no help so I brought
15 her back. I talked to Katie Kimbrell for a month, too, was
16 going to pursue something with her, too, but then she showed
17 me her tits in front of her daughter and was talking about
18 sex with me in front of her so I didn't pursue it because I
19 felt like it was going to be the same as with Sarah. I felt
20 like she would talk like that and do shit like that with the
21 kids around just like Sarah so I didn't fuck with her. She
22 said that I wouldn't let her clean and that I wanted her to
23 abuse the kids and shit but it's untrue. I fought with her
24 and fought with her trying to get her to clean, she never
25 would, or she would get angry and then go yell at the kids

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1 and hit on them and make them clean telling them she's not
2 their fucking slave and shit and hurting them. So I did
3 begin to tell her not to clean unless I was home, then I
4 would tell her to and watch her. I told her not to because
5 I didn't want the kids to get hurt. Well, in the text I
6 would tell her that I liked for them to mess because she
7 wouldn't hurt the kids if she caught them messing, so I
8 began to tell her to let them mess and shit to keep her from
9 hurting them. For a little while the kids were telling me
10 she was hurting them and I would ask her about it and she
11 would yell at me and then hurt her for telling when I went
12 back to work. She would lie and say she didn't hurt them,
13 so I began to pretend to act like I liked her abusing them
14 so she would be honest with me about doing it. If she felt
15 like I liked it she would tell me, but I didn't like it. I
16 would come home and yell at her and shit for doing it. She
17 would tell me, 'You confuse me, you tell me you like it but
18 then you yell at me and shit about it.' I even told the
19 investigators this at the first interview. I hated all of
20 the shit she was doing, that's why I was always trying to
21 get out. I really had no choice. Everyone says I should
22 have left and shit but they weren't in my shoes or had to be
23 in that situation. How was I going to leave with five kids
24 and nowhere to go? How was I supposed to survive and take
25 care of them with no job? How was I going to pay \$4,000

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1 worth of bills a month with \$1,550 social security? I had
2 to work and I had to have help. Why can't people see the
3 truth? Why can't they say that I loved her and got the kids
4 away? If I like that shit then I wouldn't have left. I
5 begged for help, I begged to get out. She would want me to
6 do bad stuff to the kids. She would want to talk about it
7 and shit, I wouldn't want to. That's why I stayed gone so
8 much even on my off days. I tried not to be home much. I
9 would find other shit to do. I talked dirty with her
10 through texts and shit but that's all I would want to do.
11 She would want to have sex in front of the kids, I wouldn't
12 do it, though. That's why she was so angry on vacation
13 because she wanted to have sex in the hotel in front of the
14 kids and I wouldn't. She twisted my nuts because I wouldn't
15 let her suck it in front of them. She would text me and
16 tell me she wanted me to fuck her on the couch with the kids
17 around and I wouldn't. She even texted later that I must
18 not really like it because I wouldn't do it. Baby, you'll
19 have to believe me. I was always trying to get out. I
20 hated what she was doing and what she was in to, that's why
21 I left. You were my God send, I told you that and I meant
22 it. I never came at you with any shit like that. You know,
23 she was so worried when I left, she told me, 'Why would you
24 go take them and move in with the police? They're going to
25 tell on me," is what she would say, and they did. They told

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1 you for two months. If I was hurting them do you think they
2 would have been so happy to see me when I came home? I know
3 the shit I said after I was at the house to Sarah was fucked
4 up but I was just trying to keep her close for the kids. I
5 really didn't want her to take the kids away. I loved them.
6 Even the kids would say they loved them and missed them. I
7 just wanted to still be in their lives. She stayed at the
8 house begging me to come back for the whole two months but I
9 wouldn't. I was never going to leave you and go back. I
10 love you. I hate how I did you at the end because I do love
11 you, and I know that I would have never left or done
12 anything intentionally to hurt you. When we went to
13 Gatlinburg together it was so wonderful. I married you
14 because I wanted to, not just for you to have rights to the
15 kids, I truly wanted to be your husband. I really am a
16 victim too, baby. I was so scared and didn't know what to
17 do or how to get out of that situation. She would hurt the
18 kids when I didn't give her her way. She would threaten me
19 if I tried to leave. I never meant any of that shit I would
20 text her about. It was always her who would start talking
21 about the shit and I never really said much back. The shit
22 I would say was either to keep the kids from getting hurt or
23 to get her to be honest about shit. I told investigators
24 this the first interview. I really do love you. I wish you
25 could ride with me through this and help me get out of this

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1 mess. I have no one. It's killing me that you won't talk
2 to me and don't want to be with me. Did you not see the
3 pain in my eyes today? I wanted to break down when you said
4 that. It broke my heart that my mom wouldn't even look at
5 me. I'm not a monster, baby, I'm not. You know when I
6 asked you if I could pee on you and shit when we first
7 started talking? I was so relieved when you said you
8 weren't into shit like that. That's why I said I was going
9 to do it to see what you would say. I'm glad you said you
10 weren't. I was looking for the exact opposite of Sarah.
11 Please believe me. If they have mine and her texts then I
12 will build my relationship with them and paint a picture of
13 all of this I'm telling you. You told me you had my back.
14 Why? I never took you for someone who didn't keep their
15 word. Why do you think I got with you to start with? If I
16 was happy about the shit Sarah was doing and I liked it then
17 I wouldn't have tried to even get with you. I would have
18 just stayed. If that made me happy I would have stayed
19 where I was happy, but I wasn't happy, I was miserable. I
20 hated all of the shit. All I wanted to do was work and take
21 care of you and the kids. Don't leave me behind. Please
22 believe me. The only reason I went with Sarah was to get
23 the videos. I could have just stayed gone but I didn't. I
24 wanted to come fight for my family. I wanted to come get
25 the truth out, come get all of this out. It broke my heart

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1 that you didn't have your rings on. I'm really sorry for
2 how all of this happened. I cry everyday about you and the
3 kids. I really hope you will believe me about all of this.
4 I'm trying to tell the truth. I want people to know the
5 truth. I didn't let the kids watch porn, Sarah did. I came
6 in from work and saw them watching it so I took the DVD and
7 shit, Bradley will tell you that. It wasn't abuse. The
8 kids, I spoiled them. I spent \$22,000 on the kids just in
9 one year just to see them smile. I was the one trying to do
10 the right thing, baby, she was the monster. Please believe
11 me. It breaks my heart that you won't believe me,
12 especially because you've seen the real me for two months.
13 You seen how I treated the kids and how I spoiled them.
14 Like for real, you seen I never came off in any type of way
15 like that. I'm going to go. I really hope that you will
16 take this into consideration and help me be my rock. I
17 really need you and hope you still love me. I really do
18 love you with all my heart and was very proud to have you as
19 my wife and would marry you everyday and any day if I could.
20 I hope this touches your heart and you will trust me and
21 shit because it is the truth. I love you. Love, Brad."

22 Q Thank you. Now, after these letters, did you have
23 anymore contact with Brad?

24 A He continued writing letters and then slowly they just
25 started to where he wasn't writing anymore. I had no

HEATHER JUDD - DIRECT

1 contact with him, though.

2 Q Okay. Throughout these letters he continuously
3 referred to himself as something. What was that?

4 A He's not a monster.

5 Q About how many times did he refer to himself as that?

6 A At least five.

7 MS. EASLER: Thank you. No further questions.

8 THE COURT: Mr. Frick -- or -- yeah. All right. Your
9 witness.

10 MR. FRICK: Yes, sir.

11 CROSS EXAMINATION

12 BY MR. FRICK:

13 Q Ms. Judd, when did you meet Brad?

14 A We reconnected around the beginning of June, 2019.

15 Q Reconnected. Tell me what you mean by that.

16 A He reached out to me on Facebook. We went to school --
17 we were in school together, that's where I knew him from,
18 yes.

19 Q You knew him before he reached out to you on Facebook.

20 A Right.

21 Q He knew you were in law enforcement at the time.

22 A Correct.

23 Q Okay. Y'all hit it off.

24 A Right.

25 Q You liked him.

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- 1 A Uh-huh.
- 2 Q So much that within two months y'all are in Gatlinburg
- 3 getting married, correct?
- 4 A Yeah. In three month, yes, sir.
- 5 Q Three months? Okay.
- 6 A Uh-huh.
- 7 Q Moved into your home.
- 8 A Uh-huh.
- 9 Q Moved in and his children in, correct?
- 10 A They moved in first, yes, sir.
- 11 Q Okay. They moved in first.
- 12 A Uh-huh.
- 13 Q Do you know when they moved in?
- 14 A I would say around the middle of July.
- 15 Q Okay. And you said you and Minor 1 really bonded?
- 16 A Yes.
- 17 Q Y'all got pretty close.
- 18 A Yes, sir.
- 19 Q Y'all had good talks.
- 20 A Yeah. They always made me laugh.
- 21 Q All right. Now, I just want to clarify something.
- 22 We're all familiar with this case but folks around here
- 23 aren't necessarily, you said Brad at one point moved out and
- 24 was living in his truck.
- 25 A Correct.

HEATHER JUDD - CROSS

- 1 Q He was a truck driver, correct?
- 2 A He was a truck driver, yes, sir.
- 3 Q A big rig driver.
- 4 A Yes.
- 5 Q Okay. And did his truck have a sleeper in it?
- 6 A Yes, it did.
- 7 Q And it had like a little -- I guess like a little
- 8 galley or a refrigerator and a microwave or something?
- 9 A Yeah. Like I guess a TV and a little -- just like a
- 10 little sleeping area.
- 11 Q So he didn't go out and move into a Ram 1500, this
- 12 was --
- 13 A No, it was a sleeper truck.
- 14 Q Okay. One that he would stay in when he's on the road,
- 15 correct?
- 16 A Right, correct.
- 17 Q And you said this was after all of this investigation
- 18 stuff was going on, correct?
- 19 A Yes.
- 20 Q He's depressed?
- 21 A Right.
- 22 Q In fact, you said at some point he tried to hurt
- 23 himself.
- 24 A Correct.
- 25 Q And became detached from you.

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- 1 A Uh-huh.
- 2 Q And the family.
- 3 A Uh-huh.
- 4 Q And that's when he got in his truck and just kind of
- 5 went away.
- 6 A Correct.
- 7 Q Okay. Was he working as a truck driver when y'all were
- 8 together?
- 9 A He was.
- 10 Q Was he a long haul, or how much did he work?
- 11 A He'd be gone a lot. Sometimes they were shorter jobs,
- 12 shorter trips, sometimes they were longer, usually at least
- 13 two or three days at a time.
- 14 Q Okay. Do you know how long he had been doing that?
- 15 A I think he got his CDL's right before his wife passed,
- 16 so --
- 17 Q When was that, do you know?
- 18 A I think it was 2018, so --
- 19 Q Years before.
- 20 A Yeah. I think it was like he'd had -- I think it was
- 21 like at least a year before we met, yes.
- 22 Q Okay. All right. And to your knowledge during that
- 23 time he was working these routes?
- 24 A To my knowledge, yes.
- 25 Q And he's not home every night when he's doing this,

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1 correct?

2 A No.

3 Q And when he got home, would he get home early or get
4 home late?

5 A It differed.

6 Q When he got the message to come --

7 A Whenever he got through with his job then he could
8 leave basically.

9 Q Do you know where he had to go get his -- did he drive
10 his truck home every night?

11 A No. He left it at a yard.

12 Q Do you know where it was?

13 A The one that I know of was in Charlotte.

14 Q Charlotte?

15 A Uh-huh.

16 Q Okay. And that's -- he would have to go drive there
17 and pick up the truck.

18 A He would drive there, pick up the truck and then go
19 pick up his load, and then he would come back after he was
20 done and pick up his car, yeah.

21 Q Okay. And that was steady work?

22 A Yeah.

23 Q I mean, most days of the week?

24 A Yeah. He was gone a lot.

25 Q Okay.

HEATHER JUDD - CROSS

1 A To my knowledge, yes.

2 Q I remember in one of these letters they were talking
3 about some videos. Did you ever see a video that he sent
4 you?

5 A He sent me two videos that he said were proof that
6 Sarah was lying on him.

7 Q Did you look at them?

8 A I did whenever I first got them, yes.

9 Q Do you remember what they contained?

10 A It was just videos of -- one you couldn't see anything
11 and it sounded like him and Sarah having a conversation, and
12 then the other one was just a video of Sarah saying, "Yeah,
13 I told the kids to lie."

14 Q Okay.

15 A That was it.

16 Q And she said that on the video, correct?

17 A It looked like her, the tattoos matched and everything.

18 Q Okay. You mentioned something about going over to the
19 Ella Street house at some point and it was a mess.

20 A It was filthy.

21 Q About when did you do that?

22 A I'm not sure when it was, but I believe it was when he
23 referred to her as when she was staying in the hotel and he
24 was there by himself. I had dropped the kids off and I had
25 walked inside, because I had I would say the girls, I had

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1 some of the kids with me and went to drop them back off with
2 Brad and that's when I had walked in. But he didn't want me
3 to, of course, he didn't want me to see that.

4 Q I understand. I understand. But he was there taking
5 care of the kids by himself.

6 A Whenever I dropped them off with him, yeah.

7 Q When you saw him, was it all his kids and her kids?

8 A I didn't see her kids, no.

9 Q But his kids.

10 A His kids.

11 Q And he's got five?

12 A He has five.

13 Q And some young ones, too, correct?

14 A Yes.

15 Q Or at least they were pretty young at that point.

16 A They're still young, yeah, uh-huh.

17 MR. FRICK: Beg the Court's indulgence.

18 THE COURT: Yeah.

19 (Break in proceedings.)

20 Q Are you aware that he didn't have any other babysitter
21 options? I know you said that he had to go back to Sarah
22 because he didn't have anywhere else to go.

23 A He said he didn't have anywhere to go. He said nobody
24 else wanted anything to do with his kids and he had no other
25 choice.

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1 Q Okay.

2 A He said he reached out on Facebook and couldn't find
3 anybody.

4 Q Did he? Do you know?

5 A I ended up finding someone to watch them --

6 Q Okay.

7 A -- myself. After they started crying that they didn't
8 want to stay with Sarah, after a few weeks of that I went
9 ahead on my own and found someone to watch them.

10 Q Okay. All right. Did your sister help out some, too?

11 A She did.

12 Q Okay. All right. But everybody worked, too, right?

13 A Correct.

14 Q So everybody was kind of like y'all, they couldn't
15 always you do it, correct?

16 A Correct.

17 Q Okay.

18 A Yeah. She watched them whenever I was working, so --

19 Q Your sister?

20 A Yes.

21 Q All right. Hold on one second.

22 (Break in proceedings.)

23 MR. FRICK: No further questions.

24 THE COURT: All right. Any redirect?

25 MS. EASLER: Briefly, Your Honor.

HEATHER JUDD - REDIRECT

1 REDIRECT EXAMINATION

2 BY MS. EASLER:

3 Q So knowing Sarah abused them the defendant still had
4 you take the kids back to Sarah?

5 A He told me to drop them off with her when there was no
6 one else to watch them, yes.

7 MS. EASLER: No further questions.

8 MR. FRICK: Nothing further.

9 THE COURT: All right. Thank you, ma'am, you can step
10 down, you're free to leave. Ladies and gentlemen of the
11 jury, we'll take a brief recess and go have something to
12 drink, some water or something out there, we'll get you back
13 out here momentarily. Don't talk about the case.

14 (The jury left the courtroom.)

15 THE COURT: Anything for the good of the cause while
16 they're out?

17 (Break in proceedings.)

18 THE COURT: All right. We're down.

19 (A break was taken.)

20 (The jury returned to the courtroom.)

21 THE COURT: All right. Thank you, ladies and
22 gentlemen. The State can call its next witness.

23 MS. LIVELY: Thank you, Your Honor. The State will
24 call Margo Dixon.

25 The witness, MARGO DIXON, was first duly sworn and

MARGO DIXON - DIRECT

1 Testified as follows:

2 THE COURT: Thank you, ma'am. You can lower your mask
3 because you're behind barriers. Thank you.

4 DIRECT EXAMINATION

5 BY MS. LIVELY:

6 Q Ms. Dixon, please tell this jury where you're currently
7 employed.

8 A Palmetto Citizens Against Sexual Assault Children's
9 Advocacy Center.

10 Q All right. And we've actually -- I know you haven't
11 been in here, we've been referring to something by the name
12 of PCASA, is that the same place?

13 A It is.

14 Q Now, Ms. Dixon, what exactly do you do for PCASA?

15 A I'm the Children's Advocacy Center Director as well as
16 the lead forensic interviewer. I conduct forensic
17 interviews.

18 Q And what kind of educational background and training
19 have you had in regards to what's referred to as a forensic
20 interview?

21 A I have a BA in Criminal Justice as well as a MA in
22 Forensic Psychology. And I attended Child First. I've also
23 attended trainings in California as well as Alabama at the
24 Advocacy Center for child advocacy and child interviewing.

25 Q When you said you've been trained in Child First, what

MARGO DIXON - DIRECT

1 is that?

2 A Child First is a protocol that is used to interview
3 children for allegations of possible abuse.

4 Q All right. And about how many forensic interviews have
5 you conducted of children?

6 A Well over 3,000.

7 Q And so, again, how long have you been doing this, Ms.
8 Dixon?

9 A Including my internship, 21 years.

10 Q Twenty-one years. All right. Now, you've already
11 mentioned doing the Child First protocol. Is that the one
12 that you use on a regular basis in regards to the forensic
13 interviews conducted at the PCASA?

14 A It is.

15 Q Do you have to do follow-up training and educational
16 and peer review and things like that in order to make sure
17 you're up to date on all of the best practices in having
18 forensic interviews of children done?

19 A We do.

20 Q All right. And are you up to date on all of that?

21 A I am.

22 Q Okay. Now, what types of questions are you trained to
23 use when interviewing children?

24 A Non-leading and open ended questions.

25 Q Who actually leads the interview as it's conducted by

MARGO DIXON - DIRECT

1 you by a child?

2 A The child that I'm interviewing at the time.

3 Q All right. So whenever you -- when you conduct these
4 forensic interviews, is the purpose to actually get some
5 type of a disclosure by the child?

6 A If there is one to be given it is.

7 Q Okay. All right. Whenever you interview the child,
8 where is it -- what's the environment like at the Child
9 Advocacy Center?

10 A The Child Advocacy Center is actually a house, it's not
11 a business office or a business setting, it's a child
12 friendly atmosphere. We have paintings on the wall as
13 though you're going -- the interview room itself is though
14 you're sitting outside in your backyard.

15 Q Is it a neutral environment?

16 A It is a neutral environment for children.

17 Q And whenever you interview a child, where do you
18 actually take the child for that interview?

19 A I take them in a room away from everyone, just the
20 child and I are in that room at the time.

21 Q Prior to taking the child into that particular room, do
22 you document who has brought the child to that interview?

23 A I do.

24 Q Are they allowed to come into the interview room with
25 you and the child?

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1 A They're not.

2 Q And when you're taking -- when you're doing the
3 interview, is there a requirement as to how you document
4 that particular interview?

5 A Yes.

6 Q What do you have to do?

7 A We have to videotape it.

8 Q Do you tell the child that they're being videotaped?

9 A Yes.

10 Q All right. And whenever you're interviewing the child,
11 are there certain rules that you tell the child in regards
12 to what's supposed to be discussed during that interview?

13 A Yes. I give them guidelines for the interview.

14 Q All right. And do you make sure that the child follows
15 those guidelines during the interview?

16 A Yes.

17 Q If a child appears to be confused, do you allow them to
18 ask you to rephrase the question?

19 A I do.

20 Q Okay. All right. So let me ask you about a particular
21 case that came to you in September of 2019. Are you
22 familiar with the case involving children from the
23 defendant, Bradley Corlew, as well as defendant Sarah Lacy?

24 A I am.

25 Q And prior to coming here today, did we discuss this

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1 case and the fact that you were going to come testify here
2 at trial?

3 A We did.

4 Q All right. So where did you receive a referral for
5 interviews to be conducted involving these children?

6 A I received the referral from the City of Chester's
7 Police Department from the -- Officer Tobias on behalf of
8 Detective Sanders and Harris.

9 Q All right. And when you receive a referral such as
10 this, what type of information are you provided by either
11 DSS or a law enforcement agency?

12 A Very little, just the possibility of abuse.

13 Q A possibility of abuse. And why is that? Why is it
14 very little?

15 A I prefer to do blind interviews. I don't want anything
16 that could sway me left or right, only the child's
17 statement.

18 Q Only the child's statement. All right. So let me ask
19 you first of all, this -- just so that I can kind of keep
20 you in a lane, the case that we're dealing with here today
21 involves Minor 2 as well as Minor 1 Okay? So
22 we're just going to talk about those two children. Total
23 children, though, that were referred to you were how many?

24 A Nine.

25 Q Nine. All right. And did you actually interview all

MARGO DIXON - DIRECT

1 of those nine children?

2 A I did not.

3 Q Okay. All right. What about children who were very
4 young, is that a problem for you to interview sometimes?

5 A It is.

6 Q Okay. Were any of these children very young?

7 A Yes, they were.

8 Q As a result of that, were some interviews not
9 conducted?

10 A Correct.

11 Q How about a child by the name of Minor 2 Was an
12 interview conducted in regards to Minor 2

13 A I did interview Minor 2

14 Q And at the time of her interview what was her age?

15 A She was 11.

16 Q Eleven. All right. Now, did you recall interviewing a
17 child by the name of Minor 1

18 A I did interview Minor 1

19 Q What was her age at the time that you interviewed her?

20 A She was 11, also.

21 Q And did you know these children other than from the
22 referral of law enforcement?

23 A I did not.

24 Q And once again you said you had very little
25 pre-knowledge as to any type of allegations involving these

MARGO DIXON - DIRECT

1 children --

2 A Correct.

3 Q -- is that correct? Okay. So when you received a
4 referral -- and you've already said you get very little
5 information, did you know what type of abuse was being
6 alleged?

7 A I did not at the time, it was just potential abuse and
8 then it was later found out sexual abuse.

9 Q Okay. And did that come out during the interviews?

10 A Yes.

11 Q All right. Well, let me just step back for a minute.
12 You already testified that you did the protocol, which is
13 you used Child First; is that correct?

14 A Correct.

15 Q You recorded and preserved the interviews; is that
16 right?

17 A I do.

18 Q I'm going to show you what we've marked as State's
19 Exhibit Number 1 and State's Exhibit Number 2. In those
20 interviews when they're documented and saved, do you provide
21 those to law enforcement as well as the solicitor's office?

22 A We do.

23 Q All right. I'm going to show you first of all, and I
24 know you can't see what's specifically in there, but based
25 upon that conversation in regards to documenting,

MARGO DIXON - DIRECT

1 downloading and providing to the solicitor's office, is
2 State's Exhibit Number 1 the forensic interviews of Minor 1

3

4 A It is.

5 Q Okay.

6 MS. LIVELY: Your Honor, I would move State's Exhibit
7 Number 1 into evidence.

8 MR. FRICK: Previous objection as ruled upon.

9 THE COURT: Yeah. All right. Objection overruled.

10 MS. LIVELY: Thank you, Your Honor.

11 (The video disc was received as State's 1.)

12 Q I'm going to show you State's Exhibit Number 2, which
13 is identified as a forensic interview of Minor 2 Was
14 that interview also downloaded, copied and provided to law
15 enforcement and the solicitor's office?

16 A It was.

17 Q And is that what that flash drive is?

18 A It is.

19 Q All right. Thank you.

20 MS. LIVELY: State moves Number 2 into evidence at this
21 time as well, Your Honor.

22 THE COURT: Same objection?

23 MR. FRICK: Yes, sir.

24 THE COURT: Objection noted, objection overruled.

25 MS. LIVELY: Thank you, Your Honor.

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1 (The video disc was received as State's 2)

2 Q I'm going to ask you just a few questions about the
3 interviews so -- for purposes of the record. Once again,
4 who was in the interview -- let's start with Minor 2
5 Who was in the interview with you whenever you interviewed
6 her?

7 A Just she and I, both of us were in the room by
8 ourselves.

9 Q And who brought her to the interview, actually to the
10 child advocacy center?

11 A At that point in time Minor 2 had been EPC'd, which she
12 had been taken into the State's custody before she came to
13 my office, so she was brought to the interview by the
14 Department of Social Services.

15 Q All right. Okay. So did you ever meet her mother,
16 Sarah Lacy?

17 A I did not.

18 Q Now, during the interview, were there any interruptions
19 or outside interference of Minor 2

20 A There wasn't.

21 Q And was Minor 2 cooperative during the interview?

22 A She was.

23 Q Did she seem competent enough to respond to your
24 questions?

25 A Yes.

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1 Q Were there any concerns -- and let me just back up for
2 a minute. There's been some testimony earlier about her
3 having cerebral palsy as well as diabetes. Did you have any
4 concerns in the interview as to her ability to understand
5 your questions?

6 A I didn't.

7 Q During the interview with Minor 2 did you use any type
8 of documents to try to assist with understanding what she
9 was disclosing to you?

10 A I did have a clear understanding.

11 Q Okay. And were there any documents or pictures used so
12 that you could confirm things like what she was calling
13 certain body parts and that type of thing?

14 A Yes.

15 Q All right.

16 A I used a picture.

17 Q You did. And is that something that is established and
18 peer reviewed as being appropriate in an interview of a
19 child?

20 A It is so that we can understand their language better.

21 Q Okay. And so in doing so, what were the pictures that
22 you used during Minor 2's interview?

23 A A boy and girl anatomy.

24 Q Okay. And in the boy and girl anatomy, do you have the
25 originals that she actually -- that you used during her

MARGO DIXON - DIRECT

1 interview?

2 A I do.

3 Q All right. Will you please pull those out for me? If
4 I may retrieve those.

5 MS. LIVELY: May I approach, Your Honor?

6 THE COURT: Yeah.

7 Q Now, I'm going to -- I'm looking at two pieces of
8 paper. Would you please just describe to me these
9 anatomical drawings? Were they used specifically with the
10 child, **Minor 2** during the interview?

11 A It's the same picture that I used with all children but
12 these were used specifically with **Minor 2**

13 Q Okay. And there's some writing on these particular
14 anatomical drawings. Who put the writing on these drawings?

15 A I put the writing on the drawing as **Minor 2** spoke to me
16 telling me -- identifying what they were to her.

17 Q Okay. And the purpose of having her do that helps to
18 define what?

19 A How she identifies her body or the human body itself.

20 Q All right. And was she able to do that on both the
21 girl anatomical drawing as well as the male?

22 A She was.

23 Q Okay. These items have now been marked as State's
24 Exhibits 18 and 19. Ms. Dixon, when you were going through
25 this information with **Minor 2** did she provide you with

MARGO DIXON - DIRECT

1 the language of how you label these particular diagrams?

2 A Yes.

3 Q All right. And so is this a fair and accurate
4 representation of how she describes her body parts?

5 A Yes.

6 Q And also on State's Exhibit Number 19, there was --
7 there's a part of the male's body that is actually
8 identified and there's a writing on it. Was that your
9 writing on this particular piece of paper?

10 A It is.

11 Q And was it based on what she identified and what she
12 called that particular body part?

13 A Yes.

14 MS. LIVELY: All right. Your Honor, the State would
15 move State's Exhibit 18, which is the female drawing, and 19
16 into evidence at this time.

17 MR. FRICK: Objection under cumulative and 403.

18 THE COURT: All right. Objection overruled.

19 (The diagrams were received as State's 18 and 19.)

20 Q In State's Exhibit Number 18, Ms. Dixon, was she able
21 to identify her female private part?

22 A She was.

23 Q And what was the name for her female private part?

24 A Her vagina.

25 Q And as it relates to the State's Exhibit Number 19, was

MARGO DIXON - DIRECT

1 she able to give you and identify the male part?

2 A The penis.

3 Q The penis? She did identify that for you.

4 A She did.

5 Q Okay. And once again this is something that you do
6 when talking to children to clarify words that are being
7 used, is that a fair statement?

8 A Correct, yes.

9 Q All right. And once again she was 11 at the time when
10 she identified these things.

11 A She was.

12 Q All right. Now, I'm going to move on here to another
13 young girl that you interviewed by the name of Minor 1

14 we've already talked about that, and her interview
15 has actually been -- it's now in evidence. Are you -- do
16 you remember taking her statement and doing an interview on
17 her?

18 A I do.

19 Q And explain to the jury how that initial interview went
20 with -- you can't tell me what she said, obviously, but just
21 tell me how it went in regards to speaking with her about
22 what the allegations were.

23 A So I interviewed Minor 1 September the 12th. She came
24 into the room, we sat down, I gave her guidelines of the
25 interview, and as we were building our rapport with one

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1 another I noticed an outside -- basically I heard some
2 noise, and I kept hearing the noise like a clicking sound,
3 and when I went to the door and opened the door. We have an
4 outside door that leads to the outside so it's an emergency
5 exit if we were in that room and we had to get out of that
6 room, and when I opened the door her stepmother and her
7 sister were outside of the room as though they were
8 listening to what Minor1 and I were talking about.

9 Q What concerns did that give you in regards to what's
10 supposed to be a private interview?

11 A It causes me concern because it puts the child in the
12 position where they feel they are compelled to say things
13 they may feel or they may not feel. And then it also causes
14 concern because it's as though the parent or the guardian or
15 whoever is there is listening to see what would be said in
16 order to say something to someone else.

17 MR. FRICK: Your Honor, I'm going to object to this,
18 this is bolstering and this is in violation of the Kromah
19 Rule.

20 THE COURT: Objection overruled.

21 Q As it relates to the protocol Child First, is anyone
22 supposed to have any contact with the child in the interview
23 room other than the interviewer?

24 A No one is to have contact.

25 Q Is that why you had concerns?

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1 A This is why I had concerns.

2 Q Okay. So after you noticed this you just basically
3 took note of that, correct?

4 A Yes.

5 Q All right. Did you continue your interview with

6 Minor 1

7 A Yes. I did continue my interview with Minor 1

8 Q And as you continued to interview Minor 1 you asked
9 open-ended questions.

10 A I did.

11 Q And her interview was preserved on a recording as well,
12 correct?

13 A Correct.

14 Q And at the end of her interview at that point in time
15 who did you release her back into the custody of at that
16 point?

17 A Her grandmother and her stepmother, those are the ones
18 who brought her, because at that point in time they were not
19 taken into the custody of the state.

20 Q Okay. So Minor 2 Sarah's child, was in the
21 custody of the state, is that what you're saying?

22 A Yeah, she was.

23 Q And Minor 1 the defendants daughter, was with
24 his wife and paternal grandmother?

25 A Correct.

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1 Q And that was documented on the forms; is that correct?

2 A It was.

3 Q All right. Do you know the name of the stepmother or
4 his new wife?

5 A I know her first name was Heather, and the
6 grandmother's name was Laura Palmer.

7 Q All right. Now, one of the things that I failed to ask
8 and I want to just ask this real quick and then I'll be
9 done, is in the particular interviews with Minor 2 was she
10 able to provide you with a time and place of the alleged
11 assault?

12 A She was.

13 Q What was the time frame for when she was assaulted and
14 by whom? Or don't tell me by whom, I'm sorry. Tell me when
15 and where, not whom, I'm sorry.

16 A May I refer to my notes?

17 Q Oh, absolutely.

18 A I do recall that it was on Ella Street, and -- I'm
19 trying to find the right date. I have noted that she said
20 it happened on Ella Street here in Chester and it happened
21 multiple times.

22 Q Okay. Fair enough. If you don't have the exact
23 date --

24 A I don't have the exact date, I do apologize.

25 Q And the interview speaks for itself, correct?

1 A Correct.

2 Q How about Minor 1 was she able to provide you in this
3 particular interview a time and place of any type of alleged
4 sexual abuse?

5 A She said it happened multiple times here in Chester on
6 Ella Street.

7 MS. LIVELY: Thank you so much. Please answer any
8 questions that the defense may have.

9 THE COURT: Mr. Frick?

10 MR. FRICK: No questions for this witness, Your Honor.

11 THE COURT: All right. Madam Solicitor?

12 MS. LIVELY: Yes, sir, Your Honor. If the Court would
13 allow I would like to have this particular witness excused
14 and publish the first interview of Minor 1 to the
15 jury.

16 THE COURT: All right. Permission to publish granted.
17 Ma'am, you can step down.

18 (At this time the recorded interview of Minor 1
19 Was played.)

20 THE COURT: All right. Anything further from the
21 State?

22 MS. LIVELY: No, not today, Your Honor.

23 THE COURT: All right, thank you. Ladies and
24 gentlemen, we have come to the end of a long day. Thank you
25 for your patience, understanding and attention as well. I

1 THE COURT: All right. Ms. Boulware gets to pick
2 first -- no whoever gets -- all right. Whoever is pulled
3 out first is going to be the alternate is what I'm saying.
4 The defense gets to do that because the State made the
5 motion to relieve the juror. Okay. So I just -- Kaitlyn,
6 you look at what's happening, reach in the envelope, can't
7 see what's happening and read the number. What's the
8 number? Short means alternate one moves up in the seat.
9 Okay. So that's how we do it.

10 (Break in proceedings.)

11 THE COURT: Any objection to the procedure that we just
12 did to move up alternate one to the regular jury from the
13 defense?

14 MR. FRICK: Nothing.

15 THE COURT: From the State?

16 MS. LIVELY: Not from the State.

17 THE COURT: All right, perfect.

18 MS. LIVELY: And what's that juror's number?

19 THE COURT: That's juror number 93 that's now going to
20 be part of this jury. All right. Anything else before I
21 bring the jury out and read them this curative instruction?

22 MR. FRICK: Yes, the seating of my client.

23 THE COURT: Okay.

24 MR. FRICK: Judge, I can tell you, if you're in that
25 grand jury box it's elevated and you're going to be able to

1 see eye level. I'm telling you right now, if you sit in
2 that chair where he is as low as possible, or if you want
3 him to move a little bit further, we put Kenny in the box
4 and all I can see was the top of his head.

5 THE COURT: From where he was sitting. I don't care if
6 he sees, I don't want her to see.

7 MS. LIVELY: Your Honor, why don't we have him sit in
8 orange taped seat in the grand jury box, that way he's not
9 only blocked by, you know, just distance but also by your
10 bench.

11 THE COURT: That's what I was thinking about.

12 MS. LIVELY: Yes, sir, and I think that will take care
13 of it.

14 (Break in the proceedings.)

15 THE COURT: All right. So when the children testify
16 I'm going to have the defendant sit over there where the
17 orange tape is. Okay?

18 MR. FRICK: Can we just go ahead and do that?

19 THE COURT: Yeah, exactly. So Mr. Corlew, I need
20 you -- you can take whatever you're looking at and go sit
21 over there. Kenny, point to where the orange tape is.
22 Right there. Thank you, sir.

23 MS. LIVELY: And, Your Honor, I'm going to need about
24 ten minutes, I hate to do that, but I'm going to have to
25 explain to the children why they cannot leave after they

1 testify.

2 THE COURT: Okay. You want to do that right now?

3 MS. LIVELY: Yeah. I'm going to go do that right now
4 if we're done with everything else.

5 THE COURT: Okay. We're done with everything else.

6 (Break in proceedings.)

7 THE COURT: All right. Let's bring the jury out.

8 (The jury returned to the courtroom.)

9 THE COURT: All right. All members of the jury are
10 present. Thank you, ladies and gentlemen. Juror number 93,
11 Ms. Hoyle, where are you? If you'll occupy that space right
12 there, you have been moved up on the trial jury. Ma'am, if
13 you'll just move right in front of you. That's perfect.
14 Okay. Y'all don't have any reserved seat, just sit where
15 you want to. If you want to shake it up some during the
16 trial, that's fine. Typically I like the foreperson of the
17 jury to be seated like kind of in the front, so -- but
18 everybody else, you can be seated wherever you want to be
19 seated. Okay? Let me talk to you briefly before we start
20 this morning, ladies and gentlemen. This case includes
21 evidence which was documented and video recorded. Because
22 you remember I told you yesterday how this trial is probably
23 going to be different from what you might expect because
24 you've never -- you think trials are always like what you
25 see on TV and movies. Okay? Well, you know, that's usually

1 that you can accurately discuss and deliberate when you get
2 the case. By doing that you may avoid the necessity of
3 replaying everything, unless, of course, you determine
4 that's what you want to do. Okay? So everybody understand?
5 We all good? All right. Sounds good. Is the State ready
6 to proceed?

7 MS. LIVELY: The State is ready, Your Honor.

8 THE COURT: All right. Call your next witness.

9 MS. LIVELY: The state would call **Minor 1** to the
10 stand.

11 The witness, **Minor 1** was first duly sworn and

12 Testified as follows:

13 THE COURT: Now **Minor 1** I'm going to ask that you --
14 see that microphone right there in front of you? If you
15 could pull it towards you -- that's beautiful. Just try to
16 talk as loud as you can. Okay?

17 THE WITNESS: Uh-huh.

18 THE COURT: All right, sounds good. Madam Solicitor?

19 MS. LIVELY: Thank you.

20 DIRECT EXAMINATION

21 BY MS. LIVELY:

22 Q **Minor 1** tell us your last name and speak into the
23 microphone so we can hear you.

24 A .

25 Q . How do you spell that?

Minor 1

- DIRECT

1 A .

2 MS. LIVELY: Madam Jackson, will you please just push

3 it down to help her a little bit with that? Thank you.

4 Q All right. We just need to make sure we hear

5 everything you say. Okay? And also whenever you answer you

6 need to say yes or no because we can't take down you nodding

7 your head. Okay?

8 A Yes, ma'am.

9 Q All right. How old are you, Minor 1

10 A Thirteen.

11 Q And are you in school?

12 A Yes, ma'am.

13 Q Where are you at school?

14 A Fort Mill Middle.

15 Q Okay. You're going to have to talk louder.

16 A Fort Mill Middle.

17 THE COURT: That's beautiful.

18 Q That's great.

19 THE COURT: If you keep talking loud like that that'll

20 make it a lot easier. Thank you.

21 Q Yeah. That way we can get through all of these

22 questions. Okay? So just talk into that microphone. Now,

23 who are you living with right now?

24 A My grandparents.

25 Q Your grandparents. And tell us what your grandma's

1 name is.

2 A Laura Palmer.

3 Q What's your grandpa's name?

4 A Ray Palmer.

5 Q Ray Palmer. How do you like living with them?

6 A It's good. I like living with them.

7 Q And are your -- do you have any brothers or sisters?

8 A Yes, ma'am.

9 Q Tell all of these jury members who your brothers and

10 sisters are.

11 A Paigley (phonetically), Reagan, Elaina (phonetically),

12 and Bradley.

13 Q Paigley, Elaina, Bradley --

14 A And Reagan.

15 Q And Reagan. Reagan is the youngest, correct?

16 A Yes, ma'am.

17 Q All right. How old is Reagan now?

18 A I think he's four.

19 Q He's four? Okay. All right. So are you the big

20 sister?

21 A Yes, ma'am.

22 Q All right. Now, I'm going to ask you a little bit

23 about your family history. Okay?

24 A Uh-huh.

25 Q That's yes?

Minor 1

- DIRECT

1 A Yeah.

2 Q All right. Tell us the name of your dad.

3 A Bradley Corlew.

4 Q Bradley Corlew. All right. What is the name of your
5 mom?

6 A Amanda Vaughn.

7 Q Amanda Vaughn. All right. Do you have a relationship
8 with Amanda Vaughn?

9 A Not really.

10 Q Okay. All right. Does she live in South Carolina?

11 A No.

12 Q Now, how do you know a person by the name of Sarah
13 Lacy?

14 A Because of my dad.

15 Q Because of your dad? Was she your dad's girlfriend at
16 one time?

17 A Yes, ma'am.

18 Q Was there a time whenever you lived with your dad and
19 Sarah Lacy?

20 A Yes, ma'am.

21 Q Okay. Well, let me go back just a little bit. Was
22 there ever a time when there was another woman in your dad's
23 life that kind of acted as your mom?

24 A Yes, ma'am.

25 Q Who was that?

Minor 1

- DIRECT

1 A Samantha.

2 Q Samantha? What was her last name?

3 A Well, they were married so I'm assuming Corlew.

4 Q Okay. I know. Sometimes I'm going to ask you an easy
5 question. Okay? All right. What happened so Samantha
6 Corlew?

7 A She passed away in, I think, 2017.

8 Q How did that affect your family whenever Samantha
9 Corlew passed away?

10 A It hurt so we cried and stuff, so --

11 Q I understand. And I'm sorry, I didn't ask my question
12 very well. After she died, what did your dad do without
13 having someone to help him with all five kids?

14 A He moved to Florida.

15 Q All right. And at that time how old were you, do you
16 remember?

17 A I think I was like nine or ten. I don't really know.
18 I don't really remember.

19 Q That's fine. Was Reagan really small when y'all moved
20 to Florida?

21 A Yeah, he was like one.

22 Q Okay. So he was a baby.

23 A Yes, ma'am.

24 Q All right. So when y'all moved to Florida, who were
25 y'all going to see in Florida?

Minor 1

- DIRECT

- 1 A My Aunt Lori (phonetically.)
- 2 Q Your aunt Lori?
- 3 A I think that's her name.
- 4 Q Okay. And when you went there where -- did you live
- 5 with your Aunt Lori? Do you remember?
- 6 A We lived with her for a little bit.
- 7 Q Okay. All right. And while you were living down there
- 8 with your aunt and with your dad, at some point did he meet
- 9 someone?
- 10 A Yes, ma'am.
- 11 Q Okay. Who did he meet while y'all were in Florida?
- 12 A He met Sarah.
- 13 Q He met Sarah. Sarah Lacy?
- 14 A Yes, ma'am.
- 15 Q So after he met Sarah, tell the jury what happened with
- 16 their relationship. How did it change while y'all were
- 17 still in Florida?
- 18 A It started to get weird, I guess.
- 19 Q Started to get weird. Well, let me ask you this before
- 20 we talk about anything weird, okay, using your words, let's
- 21 just talk about, were they dating?
- 22 A Yeah.
- 23 Q They were dating. All right. And did she have any
- 24 children?
- 25 A Yes, ma'am.

Minor 1

- DIRECT

1 Q All right. Do you remember what their names are?

2 A Bailey, Shawn, Minor 2 and Emma.

3 Q Emma, Minor 2 Bailey and Shawn. So she had four kids
4 of her own.

5 A Yes, ma'am.

6 Q All right. So at some point did -- you said that they
7 started dating, Sarah and your dad, right?

8 A Uh-huh.

9 Q Is that yes?

10 A Yeah.

11 Q Okay. So was there a time whenever you moved back here
12 to South Carolina to live?

13 A Yes, ma'am.

14 Q All right. When you moved back to South Carolina, who
15 came with you?

16 A Sarah.

17 Q Sarah. Did her children come with y'all as well?

18 A Yes, ma'am.

19 Q So it was you -- and correct me if I am wrong. Okay?
20 So it was you, your four brothers and sisters, your dad,
21 Sarah and her four children; is that right?

22 A Yes, ma'am.

23 Q Okay. When you first moved back to South Carolina,
24 what area of -- well, did you come to Chester?

25 A Yes, ma'am.

Minor 1

- DIRECT

1 Q All right. What part of Chester did y'all live in
2 first?

3 A We moved into my great grandma's house.

4 Q Your great grandma's house. Okay. Is that where you
5 lived for most of the time when y'all came back to Chester,
6 or did y'all move to somewhere else?

7 A We moved somewhere else.

8 Q You moved somewhere else. All right. Where did y'all
9 move? Do you remember the name of the street?

10 A We moved to Blackstock.

11 Q Okay. You were in Blackstock. And then after
12 Blackstock where did you move?

13 A To Ella street.

14 Q Ella Street. Can you spell that for us?

15 A E-l-l-a.

16 Q E-l-l-a. Okay. When you moved to Ella Street,

17 **Minor 1** who all was living in that house on Ella Street?

18 A My dad, his girlfriend and her kids and his kids, my
19 siblings.

20 Q I'm sorry?

21 A My siblings.

22 Q Your siblings. So how many people were living in that
23 house at one time?

24 A There was nine kids and two adults.

25 Q Nine kids and two adults. All right. Now, was your

Minor 1

- DIRECT

1 dad working when y'all moved to Ella Street?

2 A Yeah, he was a truck driver.

3 Q He was a truck driver? And did you ever get to ride in
4 the truck with him?

5 A Yes, ma'am.

6 Q All right. And would he also take any of the other
7 kids in the truck with him sometimes?

8 A Sometimes.

9 Q Sometimes? All right. All right. Now, we're going to
10 just talk about Chester, okay, Minor 1 so that we can tell
11 the jury about what happened in Chester. Okay? All right.
12 Now, Minor 1 was there a time whenever you moved -- when
13 y'all were here in Chester that -- I think you mentioned the
14 word weird before -- where things kind of changed between
15 how your dad and Sarah acted towards you?

16 A Yes, ma'am.

17 Q All right. Tell the jury kind of the first thing that
18 happened in Chester between your dad and Sarah that was kind
19 of weird.

20 A Do I have to look at him or wait?

21 Q I'm sorry?

22 A Okay.

23 Q Did you understand my question? Do you want me to
24 repeat it?

25 A Oh, no, I understand.

Minor 1

- DIRECT

1 Q So when you're in Chester, what was something that kind
2 of happened that was weird that your dad and Sarah wanted
3 you to do?

4 A They were having sex on the couch and were asking me to
5 join in.

6 Q They were asking you to join in?

7 A Yes, ma'am.

8 Q All right. And what did you do?

9 A I said no.

10 Q You said no? Okay. How did that make you feel?

11 A I felt weirded out because it was my dad, you know.

12 Q Okay. I understand. So were there other things that
13 they were doing where they started to try to get you to be a
14 part of it?

15 A Yes, ma'am.

16 Q All right. Only you and the people involved know what
17 that is. Would you please tell the jury some of the things
18 that happened, Minor 1

19 A They would like be in the bed and they would like ask
20 me to get in the middle and they like were touching me and
21 stuff.

22 Q All right. So they would be in the bed and they would
23 ask you -- they -- would they call you into the room?

24 A Yes, ma'am.

25 Q They would ask you to get in the bed with them?

Minor 1

- DIRECT

- 1 A Yes, ma'am.
- 2 Q And when they asked you to get in the bed with them,
3 was it your dad and Sarah?
- 4 A Yes, ma'am.
- 5 Q Would they have on their clothes or not?
- 6 A Most of the time.
- 7 Q Most of the time they would have on their clothes?
- 8 A Yes, ma'am.
- 9 Q Okay. That's fine. And when you got into the bed with
10 them, what would happen?
- 11 A They would like touch me.
- 12 Q Okay. All right. There's touches that can be good,
13 there's touches that you might not like. What kind of
14 touches were you getting?
- 15 A Bad.
- 16 Q Bad? Okay. Will you please tell us exactly what those
17 touches were and where they were?
- 18 A They were touching me on my vagina and my boobs, I
19 guess.
- 20 Q And were your clothes on or off when that happened?
- 21 A Sometimes they were off, sometimes they were on.
- 22 Q What would they tell you while they were doing this?
- 23 A They were telling me to touch them, too.
- 24 Q And would you have to touch them, too?
- 25 A Yes, ma'am.

Minor 1

- DIRECT

- 1 Q Where would you have to touch them?
- 2 A On their private parts.
- 3 Q Tell us first about where you touched on your dad.
- 4 A His penis.
- 5 Q His penis? Where would you touch on Sarah?
- 6 A Her vagina.
- 7 Q Now, Minor 1 when they touched you on your vagina --
- 8 it's okay. When they touched you on your vagina, would it
- 9 be on the skin of your vagina?
- 10 A The first few times it was.
- 11 Q And was there times -- what did they do -- when they
- 12 were touching you -- I'm sorry, let's be real specific.
- 13 What part of their body were they using when they touched
- 14 you on your vagina?
- 15 A Their hands.
- 16 Q Their hands. When they touched you on your vagina with
- 17 their hands, where would their hands and fingers go?
- 18 A On my vagina.
- 19 Q Was there ever a time whenever their fingers would go
- 20 somewhere else? Is that a yes?
- 21 A Yes, ma'am.
- 22 Q Okay. Could you please tell us where that would be?
- 23 A Inside my vagina.
- 24 Q Did they ever put their fingers inside of any other
- 25 part of your body?

Minor 1

- DIRECT

1 A No, ma'am.

2 Q Now, Minor 1 you said that they would call you into
3 their room. Was this something that happened just one time
4 or would it happen more or a lot of times?

5 A It happened a few times when we were living in
6 Blackstock, and then when we moved to Ella Street they would
7 call me in like almost every night and everyday.

8 Q Okay. Almost every night and everyday?

9 A Yes, ma'am.

10 Q And let me ask you, was there anytime whenever y'all
11 were on Ella Street where anything other than their fingers
12 were placed inside of your vagina?

13 A Yes, ma'am.

14 Q Okay. Will you please tell us about that?

15 A My dad's penis.

16 Q What about your dad's penis?

17 A He put it inside my vagina.

18 Q How did that feel?

19 A It hurt.

20 Q What did you tell him?

21 A I tried telling him to stop.

22 Q What did he say?

23 A Sometimes he would stop, sometimes he didn't.

24 Q Did he ever say anything to you when he did that?

25 A I mean, he would get mad at me sometimes because I

Minor 1

- DIRECT

1 couldn't take it and he said that "You should be able to,"
2 and stuff like that.

3 Q So he would get mad at you whenever you couldn't take
4 it and said that you should be able to.

5 A Yes, ma'am.

6 Q Did he put his penis inside of your vagina on one or
7 multiple occasions?

8 A It happened a lot.

9 Q Did it happen -- when it happened, were you alone with
10 your dad or were you with -- or were other kids or Sarah in
11 the room?

12 A Sarah.

13 Q Sarah would be there?

14 A Yes, ma'am.

15 Q Okay. Was there a time when Sarah would do anything to
16 you other than using her fingers on you?

17 A Yes, ma'am.

18 Q Okay. Tell us what happened.

19 A They had like sexual toys.

20 Q Okay. All right. They had sexual toys. What did the
21 sexual toys look like?

22 A They were like different shapes, colors and sizes.

23 Q And what would Sarah do with those sex toys?

24 A She would put them inside of my vagina and sometimes in
25 my butt.

Minor 1

- DIRECT

1 Q So she would put them in your vagina and your butt? Is
2 that a yes?

3 A Yes, ma'am.

4 Q I'm sorry, I just have to get you to answer out loud.
5 Okay? How about your dad?

6 A He would do the same thing.

7 Q He would do the same thing? Okay. So he used the sex
8 toys on you, too?

9 A Yes, ma'am.

10 Q Now, Minor 1 whenever -- when these were happening, at
11 any point did you want to tell your grandma or somebody what
12 was going on?

13 A I didn't really think about it, because like the way my
14 dad made it sound was that it was like normal to do.

15 Q So your dad made it sound like this was normal.

16 A Yes, ma'am.

17 Q Okay. And did you believe your dad?

18 A Yeah, because he was my dad.

19 Q Now, were there times whenever this was going on
20 whenever maybe other children would be in the room?

21 A Well, it didn't really happen, but sometimes Minor 2 was
22 in there.

23 Q Okay. Sometimes Minor 2 And is Minor 2 is she the one
24 that's Sarah's daughter that's about the same age as you or
25 a little younger?

Minor 1

- DIRECT

1 A Yes, ma'am.

2 Q All right. So when Minor 2 would be in there, tell us
3 what would happen.

4 A My dad tried sticking his penis in her like one or two
5 times because like she couldn't take it, and then they would
6 like use sexual toys on her, too.

7 Q Okay. And let's just be clear, okay, so that the jury
8 doesn't know who they -- they could probably figure it out
9 but let's just --

10 A Yeah, my dad and Sarah.

11 Q Your dad and Sarah. Okay. So your dad did try to put
12 his penis in Minor 2 a couple of times that you know of?

13 A Yes, ma'am.

14 Q Okay. Were you there when that happened?

15 A Yes, ma'am.

16 Q And you said she couldn't take it?

17 A Yes, ma'am.

18 Q All right. Okay. And so instead -- I think you just
19 said, and correct me if I'm wrong, that instead they would
20 use sex toys on her.

21 A Yes, ma'am.

22 Q And when they used sex toys on her, where would they
23 put those sex toys, Minor 1

24 A In her vagina.

25 Q In her vagina? Okay. And you saw this?

Minor 1

- DIRECT

1 A Yes, ma'am.

2 Q All right. Now, were there -- and when this was
3 happening just to make sure we are clear, Minor 1 would
4 your clothes be off?

5 A Yes, ma'am.

6 Q At any point -- well, let me back up for a second. At
7 any point were you photographed by Sarah?

8 A Yes, ma'am.

9 Q And how would you be posed?

10 A She would like get the camera close up and like take
11 videos and pictures of my vagina.

12 Q Of your vagina. Do you know? Did she tell you why she
13 did that?

14 A Sometimes I think she was sending them to my dad.

15 Q Okay. Minor 1 was there anything else that your
16 dad -- you said earlier that your dad would have you touch
17 his penis. Did he ever have you do anything else with his
18 penis?

19 A Yes, ma'am.

20 Q Okay. Will you please tell us what that was?

21 A He had me put my mouth on it.

22 Q Okay. And when he had you put your mouth on his penis
23 what happened?

24 A He made me like suck on it.

25 Q He made you suck on it. Did you suck on it for a long

Minor 1

- DIRECT

1 time?

2 A Sometimes.

3 Q And when you did, was there anything that ever happened
4 to his penis when you sucked on it?

5 A It ejaculated sometimes.

6 Q It ejaculated? And when it ejaculated was there --
7 where did that go?

8 A Like in my mouth.

9 Q All right, Minor 1 Now, was there ever a time where
10 he would put his penis anywhere other than your vagina?

11 A In my butt.

12 Q How did that feel?

13 A It hurt.

14 Q It hurt? Okay. At anytime when you lived there on
15 Ella Street, Minor 1 were you able to do normal kid
16 things?

17 A No, ma'am.

18 Q How did that make you feel?

19 A I don't know because I was like used to it.

20 Q You were used -- you don't know because you were used
21 to it?

22 A Yes, ma'am.

23 Q All right. You've got to talk a little bit louder, I
24 know it's hard.

25 A Okay.

1 Q So did you ever have any friends spend the night?

2 A No, ma'am.

3 Q Did you ever get to go spend the night at anybody
4 else's house?

5 A No, ma'am.

6 Q Did y'all have friends over for birthday parties?

7 A No.

8 Q No. Were you kept out of school often?

9 A Sometimes.

10 Q How about the other kids, would they be kept out of
11 school? Do you know?

12 A Yes, ma'am.

13 Q Now, at any point in time while all of this was going
14 on, did you have any issues with physical abuse or physical
15 hits and things like that from your dad or Sarah?

16 A Yes, ma'am.

17 Q Okay. Tell us a little bit about that.

18 A I'll tell you like one of the times that I remember.

19 Q Okay.

20 A When we were in Virginia I was hungry and like I didn't
21 eat that day, so I like was in -- I was looking in Sarah's
22 purse and I grabbed like a few quarters because I was hungry
23 and I wanted to go to the vending machine to get me
24 something, and then my dad found out about it and like threw
25 me across the room and slapped me and stuff.

Minor 1

- DIRECT

1 Q Did you ever see your dad hitting Sarah?

2 A Yes, ma'am.

3 Q Would that happen -- did that happen once or would it
4 happen often?

5 A It would happen often.

6 Q And how did you feel when you would see your dad hit
7 Sarah?

8 A I don't know.

9 Q Did you become used to it?

10 A Yes, ma'am.

11 Q Was that also part of the normal in your house?

12 A Yes, ma'am.

13 Q Now, I believe that there -- in the house at Ella
14 Street, was there a problem with keeping it clean?

15 A Yes, ma'am.

16 Q Okay. Tell us who would actually clean the house on
17 Ella Street?

18 A Me and Minor 2

19 Q You and Minor 2 Why not Sarah?

20 A Because she would like lay around the house and not do
21 anything.

22 Q Okay. Were there any other things that she did that
23 kind of messed the house up?

24 A She would like poop and pee like on the floor.

25 Q She would poop and pee on the floor? Okay. And did

- 1 she say anything about why she was doing that?
- 2 A No.
- 3 Q Okay. Well, did y'all have bathrooms in the house?
- 4 A Yes, ma'am.
- 5 Q So did the bathrooms, the toilets, did they work?
- 6 A Yes, ma'am.
- 7 Q Okay. Did you see her peeing and pooping in the floor?
- 8 A Yes, ma'am.
- 9 Q Did anyone else in the house pee or poop on the floor?
- 10 A Yes, ma'am.
- 11 Q Who?
- 12 A All of us.
- 13 Q All of you? Okay. And why did you do that?
- 14 A Because they told us to.
- 15 Q They told you to. Was this also a part of the normal
- 16 that you were referring to earlier?
- 17 A Yes, ma'am.
- 18 Q Okay. Was there any time whenever y'all would pee or
- 19 poop somewhere else?
- 20 A No.
- 21 Q Did you ever see Sarah pee or poop on a person?
- 22 A Yes, ma'am.
- 23 Q Okay. Tell us about that.
- 24 A She peed on my brother like a few times.
- 25 Q And what about you? Did anybody ever pee or poop on

Minor 1

- DIRECT

1 you?

2 A Not that I remember.

3 Q That's fine. Okay. Did you ever pee or poop on
4 anybody?

5 A No.

6 Q So would anybody clean that up at any time?

7 A I mean it would stay there for like a few days or a
8 week, but they usually cleaned it up like when someone was
9 coming over.

10 Q Okay. So if they knew somebody was coming over that's
11 when they would clean it up.

12 A Uh-huh, yeah.

13 Q That's a yes? Okay. All right. Now, I'm going to
14 talk to you about some other things and kind of move away
15 from that just a few minutes. Okay? Do you remember a
16 woman by the name of Heather Judd?

17 A Yes, ma'am.

18 Q And who was Heather Judd?

19 A She's kind of like my step mom.

20 Q She's kind of like your step mom. Okay. Do you
21 remember -- okay. I'm going to try to help you timing wise.
22 Do you remember a time whenever you and your dad moved out
23 of that Ella Street house?

24 A I don't remember the exact dates, but my dad and Sarah
25 were like arguing.

Minor 1

- DIRECT

1 Q They were arguing? Okay.

2 MS. LIVELY: Your Honor, may I approach the witness?

3 There's something on this plexiglass and I don't want to

4 block the juror and think -- and I know that that's what I'm

5 doing now, I don't mean to.

6 THE COURT: Sure. Minor 1 you're doing good, just

7 keep trying to talk as loud as you possibly can. Okay?

8 THE WITNESS: Okay.

9 Q So Minor 1 you said that Heather Judd is kind of like
10 your step mom and your dad had kind of started dating her,
11 right?

12 A Yes, ma'am.

13 Q So Sarah and your dad were fighting, is that what you
14 said?

15 A Yes, ma'am.

16 Q All right. So when y'all left the Ella Street house
17 where did y'all go from there?

18 A To Heather's.

19 Q To Heather's. All right. And when you went to
20 Heather's, was it just you and your brothers and sisters?

21 A Yes, ma'am.

22 Q Okay. And where was Sarah at that point, do you
23 remember?

24 A I think she was staying in a hotel or something.

25 Q Okay. At any point after you moved in with Heather,

Minor 1

- DIRECT

1 did you have to still go back and stay with Sarah at any
2 point in time?

3 A Yes, ma'am.

4 Q How did that make you feel?

5 A We were crying because we didn't want to go back.

6 Q You were crying because you didn't want to go back?

7 A Uh-huh.

8 Q And did you tell your dad that?

9 A Yes, ma'am.

10 Q And what did he do?

11 A He still made us go because Sarah -- I mean, not
12 Sarah -- Heather and my dad had to work so Sarah had to
13 watch us.

14 Q Okay. Where was Heather working?

15 A She works in the jailhouse in Chester.

16 Q Okay. Now, while you were living with Heather, how
17 were things going with you and your dad?

18 A He wasn't like doing anything, he was acting normal.

19 Q He was acting normal? Okay. So did he do anything
20 sexual to you while you were at Heather's house?

21 A No, ma'am.

22 Q Now, at some point in time did you learn that Sarah had
23 talked to the police?

24 A Yes, ma'am.

25 Q Okay. Tell us about how you learned that and how your

Minor 1

- DIRECT

1 dad reacted. Okay? Tell us how you learned.

2 A I heard it from my dad because he was talking to

3 Heather about it, and then -- yeah.

4 Q Okay. So he was talking to Heather about it. And was

5 there anytime whenever he actually talked to you just one on

6 one about what was going to happen after Sarah had talked to

7 the police?

8 A Yes, ma'am. He brung me into the room by myself and

9 told me not to tell anyone because he didn't want to get in

10 trouble.

11 Q Okay. When he said not to tell anyone, what was he

12 talking about? Did he tell you?

13 A Uh-huh. About like the sexual stuff and everything

14 that he's done.

15 Q All right. So when he pulled you into that room, was

16 it --

17 THE COURT: Hang on a second.

18 (Sirens are sounding outside and it is hard to hear

19 The witness.)

20 THE COURT: All right. Go ahead, sorry.

21 MS. LIVELY: No, you're fine.

22 Q So when he pulled you into the room, were you alone

23 with your dad?

24 A Yes, ma'am.

25 Q And so he was talking just to you; is that right?

Minor 1

- DIRECT

1 A Uh-huh.

2 Q Is that a yes?

3 A Yes.

4 Q Okay. And he told you not to talk about the sexual
5 stuff?

6 A Yes, ma'am.

7 Q And how did you feel about that?

8 A I did it because I didn't want my dad to get in
9 trouble.

10 Q All right. So you didn't want your dad to get in
11 trouble, is that what you're saying?

12 A Yeah.

13 Q How did you feel about getting Sarah in trouble?

14 A I never really liked Sarah so I didn't really care
15 about getting Sarah in trouble. Because my dad, like I
16 just -- like my dad is like -- I've lived with my dad for a
17 long time so like I didn't want him to get in trouble.

18 Q Okay. And if your dad got in trouble where were you
19 going to live? Did you know?

20 A No.

21 Q Okay. If your dad went to jail would you -- what were
22 the options do you think? What about DSS?

23 A Yeah.

24 Q So at that time when your dad talked to you, did you do
25 what he told you to do?

Minor 1

- DIRECT

1 A Yes, ma'am.

2 Q Okay. And at that point, Minor 1 was there a time
3 whenever your dad and Heather took another step in their
4 relationship?

5 A Yeah. They did like an emergency like marriage or
6 something because like just in case something was to happen
7 she could like take us.

8 Q Okay. All right. So you called it an emergency
9 marriage.

10 A Yes, ma'am.

11 Q All right. And, I mean, did he talk to you about that
12 as to why he was marrying Heather?

13 A He didn't really talk to me about it, but like I heard
14 him like say that like just in case anything was to go like
15 sideways or something was supposed to happen then -- yeah.

16 Q Okay. So he was trying to have a plan for if something
17 were to happen that you would be able to stay with Heather?

18 A Yes, ma'am.

19 Q Okay. And do you know why he didn't have you stay --
20 and if you don't that's fine -- do you know why he didn't
21 have you stay with your grandma who you're living with now?

22 A No.

23 Q All right. So how did you like living with Heather?

24 A It was good.

25 Q Okay. So things were good at that point with Heather

Minor 1

- DIRECT

1 and your dad?

2 A Yes, ma'am.

3 Q All right. And was that the first time in a long time
4 that you've had some kind of stability in a house?

5 A Yes, ma'am.

6 Q Okay. So did you like it?

7 A Yes, ma'am.

8 Q And how about your brothers and sisters, how were they
9 doing living in that house with Heather?

10 A They were good.

11 Q They were good? Was there any abuse at all while you
12 were living at Heather Judd's house?

13 A No, ma'am.

14 Q Was there any domestic violence that you saw, meaning
15 any fights and hitting between your dad and Heather while
16 you were living there?

17 A No, ma'am.

18 Q Did you want that to stay that way whenever you were
19 living there with your dad and Heather?

20 A Yes, ma'am.

21 Q Okay. And did you feel safe at that point?

22 A Yes, ma'am.

23 Q Even though your dad was still around you felt safe?

24 A Yes, ma'am.

25 Q And Minor 1 you love your dad; isn't that right?

Minor 1

- DIRECT

1 A Yes, ma'am.

2 Q How old were you when you moved in with Heather in I
3 think it was some time in August or July of 2019? How old
4 were you?

5 A I think I was like 11 or something.

6 Q You were 11? Okay. I'm sorry, I might have asked you
7 this, I can't remember, what's your date of birth?

8 A .

9 Q 2007. Okay. So that makes you 13?

10 A Yes, ma'am.

11 Q Okay. All right. Did you ever tell Heather any of the
12 sexual abuse that your dad did to you?

13 A No, ma'am.

14 Q Did you want to tell her?

15 A Not really. Because like it's really hard to explain
16 because like I didn't want my dad to get in trouble.

17 Q Okay. And you wanted -- did you want to stay there
18 with Heather and your dad?

19 A Yes, ma'am.

20 Q If you told Heather -- were you worried if you told
21 Heather that that might not continue to happen?

22 A Yes, ma'am.

23 Q Okay. And do you remember, did y'all go out of town
24 for the emergency marriage?

25 A Yes, ma'am.

Minor 1

- DIRECT

1 Q All right. And when you got back what did your dad do?

2 A I think when we got back that's when DSS or something
3 showed up and then I think -- I don't really remember what
4 happened.

5 Q That's fine. At some point after DSS showed up, did
6 you have to go somewhere and talk to a person about all of
7 this stuff that supposedly had gone on at Ella Street?

8 A Yes, ma'am.

9 Q Do you remember the lady that you talked to?

10 A Ms. Markenson (phonetically) I think.

11 Q Okay. Ms. Margo Dixon?

12 A Yes.

13 Q Okay. You put her name together. Ms. Margo. Okay.

14 All right. When you went who took you?

15 A My grandma.

16 Q Your grandma. Was Heather there, too?

17 A Yes, ma'am.

18 Q All right. So Heather and your grandma were there, and
19 you went to talk to Ms. Margo; is that right?

20 A Yes, ma'am.

21 Q All right. And how many times did you actually go and
22 talk to Ms. Margo?

23 A Twice.

24 Q Twice? All right. So tell us the first time that you
25 went to talk to Ms. Margo, tell this jury what you told Ms.

Minor 1

- DIRECT

1 Margo.

2 A I told her like everything that happened to like --
3 that Sarah did because I didn't want my dad to get in
4 trouble and I was scared like -- I didn't want to like get
5 taken away by like DSS.

6 Q So did you say anything about what your dad was doing
7 at all to Ms. Margo that day if you remember? If you don't
8 remember that's fine.

9 A I think the only thing that I said was like about like
10 them fighting with like fists and stuff.

11 Q So you talked about the fighting, with them fighting,
12 but how about the sexual stuff? Did you say anything about
13 the sexual abuse your dad did to you to Ms. Margo on that
14 first interview?

15 A No, ma'am.

16 Q Okay. And Minor 1 just so you know we played that
17 first interview yesterday so the jury could watch it. So
18 around the end of the interview, do you remember Ms. Margo
19 explaining to you about what her job was and who she was?

20 A Yes, ma'am.

21 Q Okay. And at some point in time did you believe she
22 was with DSS?

23 A Yes, ma'am.

24 Q Okay. And why did you bring that up? What was the
25 problem with her being with DSS?

Minor 1

- DIRECT

1 A Because I didn't want her to take like me and my
2 siblings away.

3 Q Okay. So you thought she would take your siblings and
4 you away.

5 A Yes, ma'am.

6 Q Away from whom?

7 A My dad.

8 Q Your dad? Okay. And also you already testified your
9 dad had told you not to say anything he had done to you,
10 right?

11 A Yes, ma'am.

12 Q So after that interview that you had, Minor 1 what
13 ended up happening with yourself and your siblings anyway?

14 A We ended up going into like emergency foster care.

15 Q In emergency -- so you ended up going into foster care
16 anyway.

17 A Yes.

18 Q Okay. And when you went into foster care, do you
19 remember the lady or the family that you were placed with?

20 A That first night we were placed with this woman, and I
21 think my brother went to a different one, or either -- I
22 don't remember. But then we stayed there for one night,
23 then I moved in with Brittany.

24 Q With Brittany. I know it's cold in here. Can you just
25 pull that a little bit because now that you're all cozy in

1 your blanket I can't hear you.

2 A Yeah.

3 Q Okay. So you went to stay with Brittany. So your
4 brothers and sisters were nowhere near you, is that what
5 you're saying?

6 A Yes, ma'am.

7 Q Okay. So you weren't seeing them. What about your
8 dad? Were you having any contact with your dad?

9 A No, ma'am.

10 Q Were you having any contact with Heather Judd?

11 A No, ma'am.

12 Q Were you having any contact with your grandma, Laura
13 Palmer?

14 A No, ma'am.

15 Q So it was just you with a family you've never lived
16 with before.

17 A Yes, ma'am.

18 Q Okay. And how did that feel?

19 A It felt really weird and I didn't want to be there.
20 Because like it was weird, like you're just moved in to with
21 a random family.

22 Q Okay. All right. And at some point while you were
23 staying there with your foster family, did you start to
24 think about what had happened with your dad while you were
25 in Chester on Ella Street?

Minor 1

- DIRECT

1 A Yes, ma'am.

2 Q And did you talk about it with anybody?

3 A Not really. I didn't talk to Brittany about it much,
4 but I told her that I wanted to go back and talk to Ms.
5 Margo, and I did.

6 Q Okay. So you told her that you wanted to go back and
7 talk to Ms. Margo. Okay. Ms. Margo is the one that you
8 talked to the first time and you thought was DSS, right?

9 A Yes, ma'am.

10 Q Okay. But you learned she's not DSS, right?

11 A Yes, ma'am.

12 Q Okay. So you told your foster mom, and correct me if
13 I'm wrong if I'm understanding you, you told her that you
14 wanted to go back and talk to Ms. Margo; is that right?

15 A Yes, ma'am.

16 Q Did you go back and talk to Ms. Margo, Minor 1

17 A Yes, ma'am.

18 Q And when you went back and you talked to Ms. Margo
19 what -- if you remember, what's one of the first things you
20 said whenever you walked into that interview room?

21 A I told her that I was sorry for lying.

22 Q Okay. But now, Minor 1 did you lie about what Sarah
23 had done?

24 A No.

25 Q Okay. All right. So what was the thing that was not

1 the truth?

2 A I mean, I wasn't lying, I just didn't say anything that
3 my dad did.

4 Q Okay. It's not that you were lying, you were just
5 denying that you said anything that your dad did.

6 A Yes, ma'am.

7 Q So after you apologized to her, were you able to feel
8 comfortable enough to talk about what happened on Ella
9 Street?

10 A Yes, ma'am.

11 Q And when you did, did you talk about everything that
12 you could remember at that time about what your dad and
13 Sarah were doing to you?

14 A Yes, ma'am.

15 Q Okay. Is it possible you left some stuff out?

16 A Yeah. Because it was like too much to say all at one
17 time, so it is possible that like I didn't like say like
18 maybe like two or three things.

19 Q All right. So you might have left some things out.
20 And you had testified earlier that that had become normal,
21 was a daily thing or nightly thing.

22 A Yes, ma'am.

23 Q Okay. All right. So was it just too much, is that
24 what you're saying, it was just too much to remember
25 everything?

Minor 1

- DIRECT

1 A Yes, ma'am.

2 Q So during the interview with Margo, were you telling
3 her about things that were real and that happened to you by
4 your dad?

5 A Yes, ma'am.

6 Q And you've already testified about those but I just
7 need to be sure, did he actually put his penis inside your
8 vagina?

9 A Yes, ma'am.

10 Q Did he put his fingers inside your vagina?

11 A Yes, ma'am.

12 Q Did he have you perform -- put your mouth on his penis?

13 A Yes, ma'am.

14 Q And did these things happen more than one time?

15 A Yes, ma'am.

16 Q When he put his -- would he also use sex toys on you,

17 Minor 1

18 A Yes, ma'am.

19 Q Just give me one second. Okay? Do you need anything
20 to drink?

21 (Break in proceedings.)

22 Q Minor 1 Mr. Frick, I think, is the defense attorney,
23 he's going to ask you some questions. Okay? Do you want a
24 break before that happens or are you okay?

25 A I'm good.

Minor 1

- CROSS

1 Q You're good? Okay. All right. Well, I'm going to go
2 ahead and sit down then and Mr. Frick is going to ask you
3 some questions. Okay?

4 THE COURT: All right. Thank you, Madam Solicitor.
5 Mr. Frick?

6 MR. FRICK: Thank you Your Honor.

7 CROSS EXAMINATION

8 BY MR. FRICK:

9 Q Good morning, Minor 1

10 A Good morning.

11 Q And I want to say I'm sorry you have to be here today.

12 A It's okay.

13 Q Let's talk about the person you thought was your mom,
14 Samantha, real quick.

15 A Yes, sir.

16 Q How long did you know Samantha?

17 A I think they married -- I've known her for like five
18 years, I think.

19 Q Okay. Did you think she was your real mom?

20 A Yes, ma'am. I mean, yes, sir.

21 Q Don't worry about that. But she was not your
22 biological mother.

23 A Yes, sir.

24 Q How did you find out who your biological mother was?

25 A From Sarah.

Minor 1

- CROSS

1 Q Sarah told you?

2 A She didn't like really tell me, she just like -- I
3 don't know how we got to talking about it, but she was like
4 that that's not your real mom or something, and then my dad
5 was talking about hiding the birth certificates or
6 something. I don't really remember.

7 Q Do you know why your dad didn't want you to know who
8 your biological mother was?

9 A No.

10 Q Okay. Did he get mad at Sarah about doing that?

11 A Yes.

12 Q Did they get in an argument?

13 A Yes, sir.

14 Q When Sarah told you that, were you and Sarah in an
15 argument?

16 A No.

17 Q Okay. She just told you that?

18 A Yes, sir.

19 Q Okay. But you and Samantha, y'all got along pretty
20 well?

21 A Uh-huh.

22 Q You said she passed away you think about 2017?

23 A Yes, sir.

24 Q Okay. And then I guess around a year later y'all are
25 in Chester.

1 A Uh-huh.

2 Q Had you ever lived in Chester before?

3 A Yes, sir.

4 Q Okay. So y'all were here when you were living with
5 Samantha, correct?

6 A Yes, sir.

7 Q Okay. And then come back, I guess, home? Is Chester
8 home to you?

9 A Well, not anymore, but --

10 Q I understand. But it's what you knew at the time.

11 A Yeah.

12 Q Okay. And y'all were first at Blackstock, correct?

13 A Yes, sir.

14 Q And then moved to Ella Street.

15 A Ella Street.

16 Q Here in town? Okay. And that is with you, your dad,
17 all of your siblings, so there's five children, right?

18 A Yes, sir.

19 Q Y'all, y'all's children. And then Sarah and her
20 children.

21 A Yes, sir.

22 Q And I believe you said there was nine children and two
23 adults.

24 A Yes, sir.

25 Q Okay. Who did most of the cooking and cleaning in the

Minor 1

- CROSS

1 house?

2 A Me and Minor 2

3 Q Sarah didn't do that?

4 A No.

5 Q Who kind of took care of the younger children?

6 A Me and Minor 2

7 Q So y'all were big sisters who were helping out taking
8 care of everybody.

9 A Yes, sir.

10 Q Did Sarah do much around the house?

11 A No, sir.

12 Q In fact, when stuff got cleaned up around the house it
13 was you and Minor 2 who did it, wasn't it?

14 A Yes, sir.

15 Q Do you remember about when y'all were living over on
16 Ella Street?

17 A No, I don't remember dates anymore.

18 Q And you said your dad was a truck driver.

19 A Yes, sir.

20 Q Would you see him everyday?

21 A Sometimes. Like he would be gone for like two days at
22 a time. But like usually he was home, sometimes he wasn't.

23 Q Okay. Would he get home -- I mean, was it a 9:00 to
24 5:00 job? Would he be home at 5:00 everyday?

25 A I don't really remember, but he wasn't gone for like --

1 it was like an overnight sometimes.

2 Q Right. I mean, it wasn't long-haul. He wasn't going
3 out to California and gone for a week and a half, right?

4 A No.

5 Q But he would be gone and sometimes be gone for a couple
6 of days?

7 A Yes, sir.

8 Q And when he did shorter stuff he would get home that
9 night, but do you know what time he would get home?

10 A No, sir.

11 Q Okay. Would you already have been in bed?

12 A Sometimes.

13 Q Okay. Now, did you ever go on family trips?

14 A We went to Tennessee one time. I don't really remember
15 going on very many trips.

16 Q Did you ever go to Bush Gardens?

17 A Yeah, we went there.

18 Q In fact, that's where the issue with going into Sarah's
19 purse happened, wasn't it?

20 A Yes, sir.

21 Q That's when y'all were in Virginia, right?

22 A Uh-huh.

23 Q That was a family trip?

24 A Yes, sir.

25 Q Okay. Did you go to Carowinds with your dad?

Minor 1

- CROSS

- 1 A Yes, sir.
- 2 Q How many times you reckon?
- 3 A I think we went like every weekend.
- 4 Q Every weekend.
- 5 A Well, not every weekend, but it was almost like every
- 6 weekend.
- 7 Q A lot. I know. I drug my daughter there a lot, too, I
- 8 understand.
- 9 A Yeah.
- 10 Q Did he have a season pass?
- 11 A Yes, sir.
- 12 Q Now, you said you were kept out of school. Were you
- 13 going to school?
- 14 A Yeah, but I was kept out a lot.
- 15 Q But, I mean, you weren't being home schooled, correct?
- 16 A No.
- 17 Q What school were you attending at that time?
- 18 A Chester Middle School and Chester Elementary.
- 19 Q Okay. Did you ever get held back for missing days?
- 20 A No. Because I was probably close enough to it because
- 21 I was kind of behind.
- 22 Q Right.
- 23 A Uh-huh.
- 24 Q But did you ever have to go to court for truancy?
- 25 A No.

- 1 Q Okay. How were your grades at the time?
- 2 A I don't really remember.
- 3 Q That's fine. That's fine. And I think you said you
- 4 were in middle school right now, correct?
- 5 A Yes, sir.
- 6 Q Are you in the grade you're supposed to be in?
- 7 A Yes, sir.
- 8 Q You didn't get held back, correct?
- 9 A No, sir.
- 10 Q Good for you.
- 11 A Oh, yeah. When we were like kept out a lot we would
- 12 like go to the doctor a lot, so they would get like excuses
- 13 for us not going to school.
- 14 Q So y'all would go to the doctor?
- 15 A Yeah.
- 16 Q Did Sarah go to the doctor a lot, too?
- 17 A Well, she was the one that took us to the doctor.
- 18 Q Okay. But, I mean, do you know if she had her own
- 19 appointments?
- 20 A No.
- 21 Q Okay. You never went to any with her?
- 22 A No.
- 23 Q It was all y'all's?
- 24 A Uh-huh.
- 25 Q Okay. Did Bradley, Jr., ever get held out of school

Minor 1

- CROSS

1 because he was injured?

2 A Yes, sir.

3 Q Who injured him?

4 A My dad and Sarah.

5 Q Dad and Sarah?

6 A Uh-huh.

7 Q Now, let's -- do you remember when y'all left living
8 with Sarah? I know you said you don't remember days, I'm
9 not trying to pin you down to exact date and time, just do
10 you know how long y'all had been there?

11 A The whole time that we were living with Sarah?

12 Q Yeah.

13 A I believe it was like about a year and a half or
14 something, I don't really remember.

15 Q Okay. And then do you have any idea when y'all moved
16 in with Heather?

17 A It was some time during the summer.

18 Q During the summer? Okay. All right.

19 A And we were still -- I've already said this, but we
20 were still like staying with Sarah because my dad and
21 Heather had to work.

22 Q Sure. I understand. So when they need somebody to
23 watch the children and couldn't find anybody else you were
24 going over to Sarah's house.

25 A Yes, sir.

- 1 Q And you didn't want to go over there.
- 2 A No.
- 3 Q Because of what had happened with Sarah, correct?
- 4 A Yes, sir.
- 5 Q All right. Did Heather have any children?
- 6 A Yes, she had three.
- 7 Q Three?
- 8 A Yes, sir.
- 9 Q Boys? Girls?
- 10 A Two boys and one girl.
- 11 Q Two boys one girl. What were their ages, do you know
- 12 about?
- 13 A Jacoby is about my age. Jackson, I think he's like ten
- 14 now. And then I think her youngest is -- I think she's like
- 15 four now.
- 16 Q Four? Okay.
- 17 A Uh-huh.
- 18 Q Do you get along with Heather?
- 19 A Yes.
- 20 Q Did y'all bond?
- 21 A Yes.
- 22 Q Y'all could talk about things?
- 23 A Uh-huh.
- 24 Q And solicitor asked you about when the investigation
- 25 and all of this stuff is going on your dad was talking to

Minor 1

- CROSS

1 Heather about the investigation, correct?

2 A Yeah. But he was only talking about what Sarah was
3 doing.

4 Q Right. But you heard them talk about this, correct?

5 A Yes, sir.

6 Q And your concern at that point in time was you didn't
7 want to lose your family, correct?

8 A Yes, sir.

9 Q So you didn't talk to Heather about it because you
10 didn't want to lose your family, right?

11 A Yes, sir.

12 Q You didn't tell Margo about it because you didn't want
13 to lose your family, right?

14 A No, sir.

15 Q And then after that interview, the first interview with
16 Margo, you lost your family, didn't you?

17 A Yes.

18 Q And you ended up in -- I think you said you kind of
19 moved around a little bit, you were with one family and then
20 finally with Brittany?

21 A Yes, sir.

22 Q So you moved around a little bit. No contact with any
23 of your siblings, right?

24 A No.

25 Q That upset you, right?

Minor 1

- CROSS

1 A Yes, sir.

2 Q In fact, I think you told Ms. Dixon you didn't even
3 have a chance to say goodbye, do you remember that?

4 A No.

5 Q Is that correct?

6 A Yes, sir.

7 Q And that made you feel bad, right?

8 A Yes, sir. When I went there for the first interview I
9 didn't even know that I was going to be taken away. All I
10 know is that I had to talk to a woman, and then they never
11 even told us where we were going.

12 Q Right. And then after you were with that family for a
13 little while you opened up and said "I want to talk."

14 A Yes, sir.

15 Q And now you're back with your family, right?

16 A Yes, sir.

17 Q Minor 1 give me one more second, I may be done but I
18 may have a couple more.

19 A Okay.

20 Q Just hold on one second.

21 (Break in proceedings.)

22 MR. FRICK: Minor 1 thank you for answering my
23 questions. That's all I've got.

24 THE WITNESS: Thank you.

25 THE COURT: Hang on one second. Ms. Lively, any other

Minor 1

- REDIRECT

1 questions?

2 MS. LIVELY: Just a couple.

3 REDIRECT EXAMINATION

4 BY MS. LIVELY:

5 Q You're doing good, Minor 1 Are you okay?

6 A Uh-huh.

7 Q It's just a follow-up on a couple of things that Mr.
8 Frick asked you. Okay? All right. So you said you didn't
9 know when you went to that first interview that you were
10 going to get taken away from your family, right?

11 A Yeah, I did not know.

12 Q Okay. And so did you think by telling Ms. Margo in a
13 second interview what your dad was doing to you sexually,
14 that that was going to put you back with your family?

15 A Kind of.

16 Q It kind of did? Okay. So let's talk about that. So
17 you thought that by going and talking to Ms. Margo that you
18 were going to get back with who, your siblings?

19 A Yes, ma'am.

20 Q How about your dad?

21 A I didn't really think that I was going to be back with
22 him because of everything that I said.

23 Q Okay. All right. So when you went back and talked to
24 Ms. Margo about what happened to you, did you know that that
25 would keep your dad away from your siblings as well?

Minor 1

- REDIRECT

1 A Yes, ma'am.

2 Q Okay. And why is that, do you know?

3 A Because I finally figured out that it was wrong after
4 actually thinking about it. I mean, I still love my dad but
5 I figured out that it was wrong.

6 Q You figured out what was wrong?

7 A Everything that he's done to me.

8 Q And that means the sexual abuse?

9 A Yes, ma'am.

10 Q And so when you went back to talk to Margo, it
11 wasn't -- or was it? Was it to get your dad in trouble?

12 A No.

13 Q Okay. And by that point did you know where your dad
14 was by the time you went to that second interview?

15 A I didn't really know. I think he was in jail or
16 something.

17 Q He was already in jail.

18 A I don't know.

19 Q Okay. All right. If you don't know that's fine.

20 Okay.

21 MS. LIVELY: Thank you, Minor 1

22 THE COURT: Any follow-up with that, Mr. Frick?

23 MR. FRICK: No, sir, thank you.

24 THE COURT: All right. Thank you, Minor 1 you can
25 step out that door. Okay? All right. Let me see the

Minor 1

- REDIRECT

1 lawyers up here real quick.

2 MS. LIVELY: And, Your Honor, may Ms. Jackson step out
3 as well?

4 THE COURT: Yeah.

5 (A bench conference was held.)

6 THE COURT: Y'all want to take a brief recess? The
7 jury wants to take a brief recess. Don't talk about the
8 case at all. Go back to your jury room.

9 (The jury left the courtroom.)

10 THE COURT: What are we doing next?

11 MS. LIVELY: Yes, sir. We're going to do Minor 2 and I
12 need to check on her and make sure she's okay.

13 THE COURT: You go do that, we'll take a little break.
14 Anything before we take a break?

15 MR. FRICK: Judge, just for the record I let Ms.
16 Lively know that I do not intend on calling Minor 1 back to
17 the stand for any cross examination after the playing of the
18 video. Ms. Boulware is taking care of Minor 2 so I'll let
19 her address that.

20 THE COURT: Okay. And we'll deal with Minor 2 after --

21 MS. BOULWARE: Yes, sir. I'll wait until after we have
22 done all of that.

23 THE COURT: Sounds good to me.

24 MS. LIVELY: So I'm going to excuse Minor 1 at
25 this time based on the defense --

Minor 2 - DIRECT

1 MS. LIVELY: Thank you.

2 DIRECT EXAMINATION

3 BY MS. LIVELY:

4 Q Minor 2 what's your last name?

5 A Lacy.

6 Q How old are you?

7 A Thirteen.

8 Q When is your birthday?

9 A April.

10 Q All right. And are you in school?

11 A Yes.

12 Q Great. What is your favorite subject?

13 A My favorite subject is reading.

14 Q Reading. That's great. Are you a good reader?

15 A Yes.

16 Q All right. And who are you living with right now,

17 Minor 2

18 A My sisters and brothers and nana and papa.

19 Q Your nana and papa and your sisters and brothers. How
20 many sisters and brothers do you have?

21 A I have three.

22 Q All right. Are you the oldest?

23 A Yes.

24 Q So you're the big sister.

25 A Yes.

Minor 2

- DIRECT

1 Q Yes. Okay. Now, where is -- have you seen your mom in
2 awhile?

3 A No. I have seen her in summer break.

4 Q Okay. On summer break. Okay. Now, Minor 2 do you
5 have something special that you have to go and see the
6 doctor for?

7 A Diabetes.

8 Q Okay. And you've got this really cool patch on you,
9 don't you?

10 A Yes.

11 Q All right. If you need a break for any reason make
12 sure you let me know, just raise your hand and say "I need a
13 break," okay?

14 A Okay.

15 Q All right. Now, do you know somebody by the name of
16 Brad?

17 A Yes.

18 Q And at some point did you live in a house with a man by
19 the name of Brad?

20 A Yes.

21 Q Do you know if his last name was Corlew?

22 A Yes.

23 Q And when you lived in a house, was it here in Chester?

24 A Yes.

25 Q And when you lived in that house with Mr. Brad, did

1 things happen that you didn't like?

2 A Yes.

3 Q All right. Now, was your mom living there too?

4 A Yes, and also my brothers and sisters were.

5 Q Okay. So was it a house full of kids?

6 A Yes.

7 Q All right. Now, would you tell me some of the things
8 that Brad would do that you didn't like?

9 A He would touch me in my vagina and he would touch my
10 breasts. And he would -- yeah that's -- and he would like
11 rub my breasts and touch my -- he would put his finger --
12 try to put his penis up it.

13 Q Take a deep breath. It's okay. It's okay. All right.

14 A I'm really nervous.

15 Q Are you okay?

16 A Yeah. I'm --

17 Q It's all right. Now, Minor 2 you said he would put his
18 penis -- where would he put it?

19 A In my vagina.

20 Q What happened when he did that?

21 A There would be like white stuff trying to go in.

22 Q Did anything come out of your vagina?

23 A No.

24 Q Okay. So white stuff would come -- where would the
25 white stuff come from?

Minor 2

- DIRECT

1 A His penis.

2 Q His penis? Okay. When he did these things to you,
3 were your clothes on or off?

4 A Sometimes they would be on, sometimes they would be
5 off.

6 Q All right. And how would he get you to come and be
7 with him? Tell us kind of how that would happen.

8 A He would wake me up probably about 1:00 or 2:00 in the
9 morning, maybe 12:00 --

10 Q Okay.

11 A -- at the earliest and say, "Hey, Minor 1 and Bradley
12 are up. Do you want to come watch a movie with us?"

13 Q Okay. So he would say, "Hey, Bradley and Minor 1 are
14 up, do you want to come watch a movie with us?" And so what
15 would you do?

16 A I would -- I thought he was telling the truth but he
17 wasn't. He would turn the TV off like -- they were actually
18 watching a movie, but when I came out they -- he turned it
19 off.

20 Q And when he turned off the movie, what would he do
21 next?

22 A He would tell me to get undressed.

23 Q All right. Was your mom there?

24 A No. She was sleeping with the other kids. The other
25 kids are sleeping besides the other -- and Minor 1 left the

Minor 2

- DIRECT

1 room. And Bradley one time stayed and most of the time
2 Bradley didn't.

3 Q So this happened more than one time?

4 A Yes.

5 Q Okay. And when he had you undress, what did he do
6 next?

7 A He told me to lay down next to him.

8 Q Okay. Then what would he do?

9 A He would start like putting his finger up my like --
10 like in my hole in my butt.

11 Q Okay. And then what happened next?

12 A He would start telling me to lean over.

13 Q And when you would lean over what would he do?

14 A He would try to put his penis in my butt.

15 Q Okay. How did that feel, Minor 2

16 A I didn't like it. I don't --

17 Q Did he try to put his penis anywhere else, Minor 2

18 A Yes.

19 Q Where?

20 A My vagina.

21 Q Your vagina? And how did that feel?

22 A It didn't feel good.

23 Q Okay. Did anything ever happen to your body whenever
24 he put his penis in your vagina?

25 A Sometimes he would tell me -- I would bleed and then he

Minor 2

- DIRECT

1 would immediately tell me to just go take a shower.

2 Q Okay. So sometimes you would bleed and he would just
3 tell you to go take a shower.

4 A Yeah, and tell me not to speak of my mom.

5 Q Do you remember when you went and talked to Ms. Margo
6 that she showed you some pictures? Do you remember that?

7 A Yes.

8 Q Okay. And they've got little funny stickers on them
9 now, they're like red and we've got a 18 and a 19, you don't
10 need to worry about that. Do you sometimes have a hard time
11 seeing, Minor 2

12 A Yeah, at far distance.

13 Q At far distance? All right. Well, I'm going to get up
14 a little bit closer to you and just ask you on a little
15 girl, did you point out to Ms. Margo -- can you see that
16 okay?

17 A Yes.

18 Q Did you point out to Ms. Margo during that interview
19 where Mr. Brad put his penis?

20 A Yeah. I didn't remember all of them, but he touched me
21 right here and in my vagina.

22 Q And in your vagina.

23 A And my butt.

24 Q When I flip it over what about that? I think you've
25 already said that. What part of your body is that?

Minor 2

- DIRECT

1 A My butt.

2 Q And in your butt. All right. Now, I'm going to show
3 you what's -- I've written down as 19. I'm going to show
4 you this picture and what -- is that a boy or a girl?

5 A Boy.

6 Q It's a boy. Okay. Did you circle or have her circle
7 what part of his body went in your body?

8 A Yes.

9 Q What was that?

10 A Penis.

11 Q His penis. Okay. Did he ever use anything other than
12 his penis to put inside of your body, Minor 2

13 A He used like adult toys, like dildos and like they were
14 vibrating, some of them were vibrating. He had like --
15 sometimes he would try to cuff me or my mom, and my mom.

16 Q Okay. Do you know where they got the handcuffs and the
17 dildos from?

18 A Yeah. Most of them were from Adam and Eve.

19 Q Adam and Eve? What's that?

20 A A toy store for adults.

21 Q A toy store for adults. Okay. Did they ever put
22 anything on your body or on your vagina before putting
23 things inside of you?

24 A Like it was lubricant, I don't know what it was for.

25 Q Okay. It was lubricant.

Minor 2

- DIRECT

1 A Yeah.

2 Q Okay. And how did that feel?

3 A It felt nasty and disgusting. And going back to
4 earlier, he -- like he would do that to just make it like
5 his penis to go in easier.

6 Q Okay. I'm going to ask you about a couple of more
7 things and I'm going to let you talk to somebody else.
8 Okay?

9 A Okay.

10 Q Was the house clean or dirty?

11 A Mostly dirty. He wouldn't let us wash our clothes, so
12 when he was away on his truck job my mom tried to wash all
13 the clothes she could. And the clothes were all over the
14 floor, all over like the kitchen and stuff.

15 Q Okay. Where would y'all use the bathroom?

16 A In the toilet. And sometimes like he would get a
17 bucket because he would clog up the toilet and he would make
18 us use a bucket and not throw it out. He would throw it out
19 like once a month or two weeks later.

20 Q Okay. And was that kind of gross?

21 A Yes, very much.

22 Q Okay. Was there ever a time where he had you use the
23 bathroom anywhere else?

24 A No. I don't remember.

25 Q Okay. That's fine. Do you know if anyone else used

1 the bathroom somewhere other than in the bathroom and in the
2 bucket?

3 A Yes. I think it was like his little girl.

4 Q Okay. And where would she use the bathroom?

5 A She would use it on the floor sometimes, like it would
6 be on the floor.

7 Q And who would clean up the house?

8 A My mom and me, we would work long hours to clean the
9 house, and when he came up in the house he would just
10 destroy it.

11 Q Okay. Since you've been away from Brad how have you
12 been doing?

13 A I've been good. I've had a few memories but none that
14 would bring it back for a long time.

15 Q Okay. All right. When Brad would do these things to
16 you, what did he tell you about telling other people?

17 A He told me not to even tell me mom, just to say like
18 nothing about this or he would put me in the corner and make
19 me eat sardines with no sleep or really no bathroom.

20 Q And did he have any things that you were afraid of that
21 he showed you?

22 A Well, not really afraid, more likes disgusting. It was
23 like a DVD he got from one of the orders from Adam and Eve,
24 and he got this DVD where they were testing out these things
25 for like sex toys and stuff like that.

Minor 2

- DIRECT

1 Q And you mentioned that your birthday is in April. Is
2 it April the 22nd?

3 A Yes.

4 Q April the 22nd. When you were living there on Ella
5 Street there in Chester, did you live there for months or do
6 you remember? Was it a few days?

7 A Probably like a year or two.

8 Q Okay. So you remember being there. So it was a long
9 time.

10 A Yes.

11 Q And when you were living there, Minor 2 -- this is going
12 to be my last question -- did these things happen all the
13 time?

14 A Yes, almost always.

15 Q Almost always?

16 A Yes.

17 Q Okay.

18 MS. LIVELY: Thank you, Ms. Minor 2 Answer any
19 questions that Ms. Boulware has for you. Okay?

20 THE WITNESS: Okay.

21 MS. LIVELY: Thank you.

22 THE COURT: All right. Ms. Boulware?

23 CROSS EXAMINATION

24 BY MS. BOULWARE:

25 Q Hi, Minor 2

1 A Hello.

2 Q How are you today?

3 A Good.

4 Q Good. Just a few questions for you, we're not going to
5 keep you real long. Okay?

6 A Okay.

7 Q So you visited with your mom a little bit?

8 A Yeah, in the summer. I only got to spend like a few
9 hours with her. It was my sister's -- like they were doing
10 an earlier celebration for my sister, which is nice.

11 Q Okay. And when you lived with your mom you tried to do
12 what she said, what she asked you to do.

13 A Yeah. I knew like -- and stuff like Brad would do,
14 tell her to do, I had no choice to listen to her or me and
15 her would get seriously beat up.

16 Q Oh, okay. Okay. So you were 11 when you talked to
17 Ms. Margo; is that correct? Does that sound about right?

18 A Yeah. Ten or 11, yeah.

19 Q Okay. Because you used some real grown-up terms, I was
20 kind of impressed by that a little bit. Where did you learn
21 the word dildos?

22 A He just told me what they -- Brad told me what they
23 were.

24 Q Brad told you? Okay.

25 A And mom.

Minor 2

- CROSS

1 Q And your mom? Did your mom ever tell you about things
2 that Brad would do with -- I mean, I'm sorry, that your mom
3 would do with the other kids in the house?

4 A No.

5 Q Okay.

6 A Except for Minor 1 really.

7 Q That was all, just Minor 1 Okay. Did your mom, did
8 she apologize to you at some point?

9 A Yeah. She apologized right after she did it. She
10 always told me like, "Sorry, I didn't mean to. This is all
11 Brad's fault."

12 Q Okay. And you and your mom cleaned up the house
13 together?

14 A Yeah, almost always.

15 Q Did Minor 1 ever help you?

16 A Yeah, Minor 1 helped us a lot.

17 Q Okay. But it was you and your mom mostly?

18 A Yeah.

19 Q Okay.

20 A Sometimes it would just be her or sometimes we would
21 take breaks, me and Minor 1 and mom.

22 Q Okay. Did your mom ever have any boyfriends besides
23 Brad?

24 A No, but she talked to her friends. It wasn't really
25 intimate with others.

Minor 2

- CROSS

1 Q Did you guys ever live with anybody besides Brad?

2 A No, not that I remember, but nana and papa --

3 Q That's it. I've got it. Do you remember telling Ms.
4 Margo that Brad was dating somebody behind your mom's back?

5 A Yeah. I don't remember her name but it probably -- I
6 think it was a police officer or something --

7 Q Oh, okay.

8 A -- in that range.

9 Q How did you find that out?

10 A I just saw a police car and I was like, "Oh, no." I
11 figured out it was -- like I heard my mom and -- excuse
12 me -- Brad talking.

13 Q Okay. Were you able to talk to your mom -- and this
14 may be a long time ago and you might not remember, but were
15 you able to talk to your mom before you had your interview
16 with Ms. Margo?

17 A Yeah. We talked a little bit about stuff.

18 Q Okay. Do you remember maybe what you talked about?

19 A No, I don't.

20 Q That's okay. Not a problem. I'm going to ask you just
21 to hang on just one second. Okay? I'll be right back.

22 (Break in proceedings.)

23 MS. BOULWARE: Okay. Okay. Ms. Minor2 I think we're
24 finished so you can go on about your day. Okay?

25 THE WITNESS: Okay.

Minor 2

- CROSS

1 THE COURT: All right. Do you have any other
2 questions?

3 MS. LIVELY: Not from the State.

4 THE COURT: Thank you, Minor 2 take care. Is the State
5 ready to call your next witness?

6 MS. LIVELY: Your Honor, since the jury is in here I
7 will tell you what the State's intent was, at this point was
8 to play one of the videos. This one is about an hour long
9 involving Minor 1 I wanted to publish that to the
10 jury so --

11 THE COURT: That is the second interview?

12 MS. LIVELY: That's the second interview that followed
13 up the one that they watched yesterday, so if you want to
14 find out what their --

15 THE COURT: All right. Well, ladies and gentlemen, I
16 mean, it's 11:30 now, not quite 11:30, we can go ahead and
17 do that and then go to lunch, or we can take an early lunch
18 and start early this afternoon. Why don't you find out what
19 they want to do?

20 THE JUROR: Let's go ahead and watch it.

21 THE COURT: Okay. Watch it, let's do it. And this is
22 already in evidence?

23 MS. LIVELY: All of these interviews are in evidence,
24 Your Honor, yes, sir.

25 THE COURT: All right. Permission to publish granted.

1 MS. LIVELY: Thank you. We're going to hook it up,
2 Your Honor, just give us like three minutes.

3 THE COURT: Do y'all want to get some refreshments or
4 take a quick break while they set everything up or -- sounds
5 good. Remember what I instructed y'all on videos.

6 MS. LIVELY: Your Honor, for purposes of the record
7 we're publishing State's Exhibit Number 1, the second
8 interview of Minor 1 which happened on
9 September 25th of 2019.

10 THE COURT: All right. Permission to publish granted.

11 MS. LIVELY: Thank you.

12 (The video interview of Minor 1 was played.)

13 MS. LIVELY: That's it, Your Honor.

14 THE COURT: All right. Thank you. Ladies and
15 gentlemen, we'll go ahead and break for lunch, I want you
16 back in your jury room at 2:00 p.m. Don't discuss the case,
17 don't look up any information on the case while you're away
18 from the courthouse. Okay? Thank you very much, have a
19 good lunch.

20 (The jury left the courtroom.)

21 THE COURT: All right. Anything before we break for
22 lunch?

23 MR. FRICK: No, sir.

24 MS. LIVELY: Not from the State, Your Honor.

25 THE COURT: All right. See y'all back at 2:00. Thank

SARAH LACY - DIRECT

1 you.

2 (A lunch break was taken.)

3 THE COURT: All right. Bring the jury in.

4 (The jury returned to the courtroom.)

5 THE COURT: All members of the jury are present. Thank
6 you, ladies and gentlemen, I hope you had a good lunch, a
7 good break. We'll jump right into it this afternoon. Madam
8 Solicitor, you may call your next witness.

9 MS. LIVELY: Thank you, Your Honor. The State calls
10 Sarah Lacy to the stand.

11 The witness, SARAH LACY, was first duly sworn and
12 Testified as follows:

13 THE COURT: You can have a seat there, watch out for
14 the microphone. You can lower your mask since you're behind
15 barricades, and just make sure you speak loudly into the
16 microphone. Okay? All right.

17 DIRECT EXAMINATION

18 BY MS. LIVELY:

19 Q Sarah, where are you currently living? You don't have
20 to give me a street address.

21 A Kershaw.

22 Q In Kershaw County? All right.

23 A In Lancaster County.

24 Q I'm sorry?

25 A In Lancaster County.

SARAH LACY - DIRECT

1 Q Okay. Let's start over. Where are you living?

2 A In Kershaw in Lancaster County.

3 Q In Lancaster County. All right. And you have four
4 children; is that correct?

5 A Yes, ma'am.

6 Q Will you name them to the jury, please?

7 A Minor 2 Shawn L. Emma L. and Bailey L.

8 Q And were you in a relationship --

9 THE COURT: Let me pause you right there. See that
10 microphone? Grab it and move it up. Yeah, now move it
11 towards your face. Perfect. Thank you.

12 Q Were you in a relationship with the defendant, Bradley
13 Corlew, in -- some time in 2018 through 2019?

14 A Yes, ma'am.

15 Q All right. Where did you meet him?

16 A Online on POF.

17 Q On POF? In case the jury doesn't know what that is,
18 what's POF?

19 A Plenty of Fish.

20 Q Is that a dating website?

21 A Yes, ma'am.

22 Q And after you met him, did you end up moving to
23 Chester, South Carolina?

24 A We moved to Blackstock and then Chester.

25 Q And then Chester. Okay. And you're aware of what you

SARAH LACY - DIRECT

1 are here to testify about here today, correct?

2 A Yes, ma'am.

3 Q All right. And I'm just going to ask you real quick,
4 before we get into what happened in this particular case,
5 have you been offered a plea deal by the State in order to
6 testify here today?

7 A Yes, ma'am.

8 Q All right. And do you remember what that plea deal is
9 or do you need me to remind you?

10 A You can remind me.

11 Q Whenever you went to Chester PD -- I'm just going to
12 back up for a minute for timing -- do you remember when it
13 was that you first reported some type of abuse at the hands
14 of the defendant, approximately when that was?

15 A That would have been in Rock Hill probably the 20th.

16 Q I'm more interested in the month than the year if you
17 can remember.

18 A August.

19 Q August?

20 A I believe.

21 Q Okay. What year?

22 A 2019.

23 Q Okay. August of 2019. And after you made this report,
24 did you give a voluntary statement to law enforcement
25 regarding the allegations of abuse of the Corlew children as

SARAH LACY - DIRECT

1 well as some of your children?

2 A Yes, ma'am.

3 Q All right. Did you give a written statement as well as
4 a recorded statement?

5 A Yes, ma'am.

6 Q And at that time was the information you provided to
7 law enforcement, did it result in your arrest for multiple
8 charges?

9 A Yes, ma'am.

10 Q And do you remember the date you were arrested?

11 A I don't.

12 Q Okay. Was it -- if I told you it was September 16th of
13 2019, would you disagree with me?

14 A That sounds about right.

15 Q All right. And when you were arrested, did you go to
16 jail?

17 A Yes.

18 Q All right. At some point while you were in jail, did
19 you speak with your lawyer about an offer that was being
20 made by the State?

21 A Yes, ma'am.

22 Q Okay. And in that offer, what would you have to do in
23 order for you to get this offer from my office?

24 A Testify and cooperate.

25 Q Testify and cooperate. All right. Had you already, as

SARAH LACY - DIRECT

1 I stated before, given a full statement to law enforcement
2 about what had happened when you were with Bradley Corlew
3 and the children?

4 A Yes, ma'am.

5 Q Okay. Has any of that information that you gave back
6 in August of 2019, has any of that changed at all since what
7 you gave?

8 A No.

9 Q Is your testimony that you're going to provide today
10 anything different from what the information that was
11 provided in August of 2019?

12 A No.

13 Q When were you -- when did you actually accept the plea
14 deal?

15 A September 20th of 2019, I believe.

16 Q Okay. All right. If I show you --

17 A Or 20.

18 Q Okay. Take a deep breath. What year was it that you
19 got this plea offer? All right. I'm going to show you
20 something and ask if it refreshes your recollection. Will
21 you look at the date on this letter to your attorney and
22 tell me what month and what year that reminds you of?

23 A September 3rd, 2020.

24 Q Okay. So a year later you received an offer to
25 cooperate with the State; is that correct?

SARAH LACY - DIRECT

1 A Yes, ma'am.

2 Q All right. Do you remember what day you pled guilty to
3 certain charges before this Court?

4 A September 19th of 2020.

5 Q Okay. I'm going to show you this and ask you if this
6 refreshes your memory as to the date.

7 A September 10th.

8 Q Of what year?

9 A 2020.

10 Q And at that time did the State offer for you to plead
11 to charges that would not carry a potential life sentence?

12 A Yes.

13 Q All right. As a matter of fact you pled to criminal
14 solicitation of a minor; is that right?

15 A Yes.

16 Q And how much time does that carry?

17 A Ten.

18 Q It carries ten years. Then you pled to another
19 offense, was it unlawful conduct towards a child?

20 A Yes, ma'am.

21 Q And how many years was that?

22 A Five.

23 Q And is that going to run consecutive, meaning back to
24 back?

25 A Yes.

SARAH LACY - DIRECT

1 Q So a total of 15 years is what you're looking at.

2 A Yes.

3 Q And if you don't cooperate with the State based upon
4 that agreement, what happens to you?

5 A I get life.

6 Q Well, you get to possibly be in a courtroom and we
7 could be trying your case; is that right?

8 A Yes, ma'am.

9 Q And in pleading to that have you been sentenced yet?

10 A No.

11 Q All right. So you know that you still have that
12 hanging over your head.

13 A Oh, yes.

14 Q Okay. And once you're sentenced, are you going to be a
15 registered sex offender?

16 A Yes, I will be.

17 Q So is anything -- and by making this offer, has it
18 changed anything once again that you said when you talked to
19 the police the first time you reported this?

20 A No.

21 Q Okay. Now, Sarah, whenever you were living with Mr.
22 Corlew in Blackstock and then in the City of Chester, did
23 you participate in sexual acts with the children?

24 A Yes, ma'am.

25 Q All right. And I'm going to ask you specifically, tell

SARAH LACY - DIRECT

1 us what type of sexual acts you committed on Minor 1

2 A I used a dildo to penetrate her vagina.

3 Q Okay. Was that when you were alone with her or with
4 the defendant, or both?

5 A Both.

6 Q Both? Okay. And would you ever use your hands to
7 penetrate her?

8 A Yes.

9 Q And whenever you were doing this did the defendant join
10 in sometimes?

11 A Yes.

12 Q And whenever he joined in, please explain to the jury
13 what that meant. What did he do?

14 A He tried to penetrate her with his fingers, his penis.

15 Q And did you witness this?

16 A Yes.

17 Q And how about your own daughter, Minor 2 What
18 type of sexual acts did you perform on her?

19 A I had to use a dildo to open her up.

20 Q When you say use a dildo to open her up, what --

21 A To open her vagina so he could fit inside.

22 Q He could fit what inside?

23 A His penis.

24 Q Did you see him do this?

25 A Yes.

SARAH LACY - DIRECT

- 1 Q How many times did that happen? More than once?
- 2 A Multiple.
- 3 Q Multiple?
- 4 A Multiple occasions.
- 5 Q And that's Minor 2
- 6 A Minor 2 and Minor 1
- 7 Q And Minor 1 All right. Now, whenever these sexual
- 8 acts were taking place, at any point in time did you try and
- 9 stop the defendant?
- 10 A Yes.
- 11 Q You did? Okay. Why didn't you stop?
- 12 A Because it was at his request and I was afraid for the
- 13 children's and my safety.
- 14 Q Okay. How many months did this go on?
- 15 A For about I want to say a year.
- 16 Q About a year? So I'm going to go back and ask you some
- 17 questions that I have asked you before, but did you ever
- 18 personally witness Defendant Corlew getting oral sex from
- 19 Minor 1
- 20 A Yes, ma'am.
- 21 Q Was that on more than one occasion?
- 22 A Yes, multiple occasions.
- 23 Q Multiple occasions. Okay. Did you personally witness
- 24 Defendant Corlew getting oral sex from Minor 2
- 25 A Yes, ma'am.

SARAH LACY - DIRECT

1 Q And you said whenever the Defendant Corlew asked you to
2 use a dildo on Minor 2 it was to open her up, and that
3 happened on multiple occasions; is that correct?

4 A Yes, ma'am.

5 Q Did you ever witness your daughter bleeding as a result
6 of any of this --

7 A Once.

8 Q -- in her vaginal area?

9 A Once.

10 Q Did you take her to the doctor?

11 A No. We weren't allowed to go to the doctor unless if
12 it was under his okay.

13 Q What did you do for her bleeding vagina?

14 A I watched her and made sure it stopped, gave her a pad.

15 Q Okay. Were there certain bodily functions that you
16 would do with and on the children?

17 A I was told to pee on the children and they were told to
18 pee on me.

19 Q Okay. I need you to name who you peed on.

20 A Bradley, Minor 1

21 Q And who -- would any of those children then have to
22 urinate on you?

23 A Yes, ma'am.

24 Q Who?

25 A Bradley.

SARAH LACY - DIRECT

1 Q Was there a time when you actually recorded one of the
2 children urinating on the floor?

3 A Yes.

4 Q Why did you video that?

5 A At the request of Brad.

6 Q Brad? Well, tell me what -- you were the live-in
7 girlfriend, what was his sexual desires and gratifications?
8 What gratitude him?

9 A Being with kids. I found him multiple occasions having
10 sex with Minor 1 when I would come home from the store.
11 Bestiality.

12 Q Did you ever witness any of the bestiality?

13 A No.

14 Q So what do you mean bestiality?

15 A He liked to watch it on the internet.

16 Q All right. So you've actually seen that?

17 A Yeah. He showed me it.

18 Q He showed you? Okay. Did you watch pornography with
19 him?

20 A Yes.

21 Q And tell us about all of these toys that -- all of the
22 sex toys in the home. Where did you get those from?

23 A AdamandEve.com.

24 Q And would you have those delivered to the Ella Street
25 house?

SARAH LACY - DIRECT

- 1 A Yes.
- 2 Q Who was allowed to hold and touch these sex toys?
- 3 A Everyone was.
- 4 Q Everyone?
- 5 A The kids; Minor 1 Bradley, Minor 2 Shawn.
- 6 Q All right. And how about pornography? Who all was
- 7 allowed to watch pornography in the house?
- 8 A Bradley, Minor 1 Shawn.
- 9 Q What about Minor 2
- 10 A Minor 2 would watch it, too.
- 11 Q Minor 2 would watch it, too. All right. And were there
- 12 times whenever the defendant would request that you do
- 13 specific acts with the children?
- 14 A Yes.
- 15 Q Okay. Tell us about that.
- 16 A All of the time. He would want me to video myself or
- 17 the kids having sex with each other.
- 18 Q And did you do that?
- 19 A Yes.
- 20 Q And would he be working whenever this would happen?
- 21 A Working or in the other room, or right there in front
- 22 of him.
- 23 Q Or right in front of you. All right. And did -- at
- 24 any point in time whenever you were recording these videos,
- 25 did you save them on your phone?

SARAH LACY - DIRECT

1 A He had me delete some of them.

2 Q Okay. And you said that you would send them to him; is
3 that right?

4 A Yes.

5 Q All right.

6 A And then he would tell me to delete them.

7 Q Why did he tell you to delete them?

8 A So nobody got ahold of them.

9 Q And this might be an obvious question, but why didn't
10 you want anybody to get ahold of them?

11 A Because it's a bad thing to do.

12 Q It's an illegal thing to do.

13 A Yes.

14 Q Yes. Okay. Did you write a statement -- and I have
15 already kind of talked about this -- a 16 page statement to
16 law enforcement when you first reported the domestic
17 violence?

18 A Yes, ma'am.

19 Q Okay. And have you reread that statement?

20 A Yes.

21 Q Okay. And is everything in that statement -- and we've
22 actually marked it, it's not in evidence, but the statement,
23 is everything in it? Was it accurate?

24 A Yes, ma'am.

25 Q And as to what you're testifying here to today, is that

SARAH LACY - DIRECT

1 everything that you're telling us accurate?

2 A Yes.

3 Q Now, Sarah, after you went to law enforcement and you
4 made these statements, did you hear from the defendant, Mr.
5 Corlew, again?

6 A Yes.

7 Q All right. Tell the jury about that. Tell us kind of
8 how that unfolded.

9 A It was on the Xbox, and we talked, and at the time I
10 was not in a good mental state and I had him meet me. I was
11 planning to say my goodbyes and everything, and he told me
12 no, you need to get a break, you need to get a break. He
13 goes, "Let's go on a road trip."

14 Q Let me just stop you right there. He said you need to
15 go on a road trip. This was after you had already told
16 everything to the police; is that right?

17 A Yes.

18 Q Okay. And who reached out to who?

19 A He had pushed buttons and then I responded.

20 Q And that's my question, who reached out --

21 A He reached out to me.

22 Q Okay. Thank you. And did you agree to meet him?

23 A Yes.

24 Q Had he married Heather by that time?

25 A Not to my knowledge but I'm not positive. I'm not sure

SARAH LACY - DIRECT

1 when they married.

2 Q I understand.

3 A I wasn't apart of it.

4 Q I understand that. Were you aware that he married
5 Heather?

6 A Yes.

7 Q Okay. I wanted to make sure. So when you went on this
8 trip with Mister -- with the defendant, I mean, what were
9 y'all doing on this trip?

10 A Well, he started tossing phone evidence. He tried
11 having me say that I would, you know, undo everything, I did
12 everything. He would coerce me into saying things. And we
13 had sex.

14 Q Okay. And did you ever tell him that you would tell
15 the kids to lie?

16 A In one of the videos that he requested I say.

17 Q So were you doing what he wanted you to do?

18 A Yes.

19 Q And you had sex with him, correct?

20 A Yes, ma'am.

21 Q All right. So whenever you -- did you ever send him
22 any kind of a text message telling him he needed to kill
23 himself?

24 A No.

25 Q Are you aware of anything of that nature that happened

SARAH LACY - DIRECT

1 during this time?

2 A Yes. And I believe I'm the one that reported it to the
3 police.

4 Q What happened? What did you report?

5 A He had text me saying that he was -- had downed a
6 bottle or two of NyQuil and was going to kill himself, and
7 he was in the woods, and that he loved me, and everything
8 would come to an end.

9 Q All right. So what did you do?

10 A I notified Tobias.

11 Q Tobias? And that's the victim advocate at the city?

12 A Yep.

13 Q And when you notified her, do you know what happened
14 after that? If you don't, that's fine.

15 A As far as I'm aware they had a big manhunt looking for
16 him.

17 Q Okay. Did you see him again after that? I mean,
18 before you were arrested, okay, after y'all spent the time
19 together, had sex, threw away evidence.

20 A When we came back is when I was arrested.

21 Q Okay. All right. Thank you. So whenever you were
22 arrested, did you have anymore contact with the defendant?

23 A Yes.

24 Q Okay. Tell us about that.

25 A We wrote letters back and forth for awhile.

SARAH LACY - DIRECT

1 Q Were you aware that he was still also writing letters
2 to Heather?

3 A I found that after I got out.

4 Q And we've already got two letters that are in evidence.

5 MR. FRICK: I'm just going to approach. Your Honor, if
6 I may?

7 THE COURT: Sure.

8 Q I'm going to show you what's already in evidence,
9 Exhibit 9 and Exhibit 10. I think more so on Exhibit 10 you
10 can see this. Can you tell me what the postmark is on
11 these?

12 A It's October it looks like 10th to Heather Corlew.

13 Q Of 2019?

14 A Yes. And then October 17th, 2019, to Heather Judd.

15 Q All right. So he's sending these letters to his wife
16 and you said you didn't know about that, right?

17 A No, I did not, until after I got out of jail.

18 Q I'm going to show you what's been marked as State's
19 Exhibit Number 13. One moment.

20 MS. LIVELY: If I may approach, Your Honor.

21 THE COURT: Yeah.

22 Q I'm going to show you this letter. If you will look at
23 it and tell me, do you recognize that letter?

24 A I just saw this letter today.

25 Q Okay. All right. Well, let's back up for a minute.

SARAH LACY - DIRECT

1 That letter, who wrote that letter?

2 A Brad.

3 Q Okay. And who did he write it to?

4 A He wrote it to me.

5 Q He wrote it to you. And is that letter full of
6 information that only the two of you would know?

7 A Yes.

8 Q As in what happened between the two of y'all.

9 A Yes.

10 Q And if you would look --

11 MS. LIVELY: May I approach again, Your Honor? I
12 apologize.

13 Q I want you to look at the envelope.

14 A The envelope?

15 Q Yeah, the envelope within the envelope. Whose name is
16 on that?

17 A My name and Francis Langley.

18 Q Who is Francis Langley?

19 A His grandmother.

20 Q His grandmother? Okay. So that letter was originally
21 sent -- one envelope says your name, correct?

22 A Yes, ma'am.

23 Q And then the Francis Langley is his grandmother,
24 correct?

25 A Yep.

SARAH LACY - DIRECT

1 Q Is that how that letter was to get to you?

2 A Yep.

3 Q And so you reviewed that letter. Is that letter -- was
4 it signed by Mr. Corlew?

5 A Yes.

6 Q Okay.

7 MS. LIVELY: Your Honor, the State would move Exhibit
8 13 into evidence.

9 MR. FRICK: Your Honor, I would object. She said she
10 hadn't seen it before today, I don't think that establishes
11 the foundation.

12 THE COURT: Objection overruled, introduced into
13 evidence.

14 MS. LIVELY: Thank you.

15 (The letter was received as State's 13.)

16 Q So in regards to this letter --

17 THE COURT: What's the number of that?

18 MS. LIVELY: 13. Yes, sir.

19 Q All right. In regards to that particular letter you
20 said that you have read through it, correct?

21 A Yes, I read through it.

22 Q And in this letter clearly is he talking directly to
23 you?

24 A Yes.

25 Q All right. And I'm going to ask you -- I've got a copy

SARAH LACY - DIRECT

1 of it here, and we're not going to go through the whole
2 thing, but once again, what is the postmark on that letter
3 to you?

4 A October 28th, 2019.

5 Q October 28th. So that would have been -- let's do the
6 math. The ones from Heather were October 17th, so 11 days
7 later?

8 A Yep.

9 Q Okay. If you would read this highlighted portion close
10 to the top of that letter.

11 A "I love you so much. Please don't let them play us
12 against each other in Chester. Don't let them play you. I
13 love you and only you. If Heather tries to tell you I wrote
14 her she is telling you the truth."

15 Q Okay. All right. Hold on just a minute. All right.
16 So in regards to -- did you know that he was still wanting
17 to be with you?

18 A He told me in his letters repeatedly.

19 Q Okay. All right. And was this even after -- obviously
20 even after he had married Heather.

21 A Yes.

22 Q Okay.

23 A Even after we were both arrested he told me in letters.

24 Q And what is the highlighted portion close to the
25 bottom, Ms. Lacy?

SARAH LACY - DIRECT

1 A "You know I got your back, Baby. I barely said
2 anything about you in the interview."

3 Q Okay.

4 A "I have barely said anything at all about you doing
5 sexual stuff and I really do want to have your back. Please
6 don't make me break my loyalty."

7 Q I'm not going to have you read the bottom part, if you
8 will just read this one top sentence up here. What does
9 that say?

10 A "I really want us to work together. I think we can
11 beat this if we work together."

12 Q And while you were in jail, were you actually
13 communicating with him at all other than through letters?

14 A No.

15 Q Okay.

16 A Well, we did talk through the doors.

17 Q Through the doors. So y'all were talking through the
18 doors to one another.

19 A Yes.

20 Q At some point, did they have to move one of y'all to a
21 different detention facility?

22 A Yes. They moved me to Chester and he remained in
23 Fairfield.

24 Q All right. That was to separate y'all?

25 A They told me it was for medical reasons.

SARAH LACY - DIRECT

1 Q Okay. All right. I'm going to have you read this one
2 lower paragraph right above where his signature is. If you
3 would read that right there, please, highlighted.

4 A Yes, ma'am. "I hope you know I didn't say much about
5 you to the police. I lawyered up. I was going to put it
6 off on you when I first got here because McKenzie said you
7 were putting it off on me, but you wrote me and then I
8 realized it was all lies and I was like 'I'm not breaking my
9 loyalty to my baby,' and I was happy I didn't have to. I'm
10 writing in the dark."

11 Q All right. And then the last thing, Ms. Lacy, if I
12 could, at the -- this particular -- is the last page. There
13 are two ps's on that. Please tell us what that ps's say.

14 A "PS, the videos I took on our trip I didn't turn in, I
15 deleted them but Harris got my phone out of my property so I
16 don't know if he got them. But I didn't take any of you
17 saying anything incriminating so you're okay on that. Pps,
18 I don't think they have much evidence so don't say shit
19 about me or you and I won't either."

20 Q And then how does he it?

21 A "I love you, I swear on Bugs."

22 Q Who's Bugs? What does that mean?

23 A Bugs is his youngest son.

24 MS. LIVELY: Thank you. Answer any questions that the
25 defense may have.

SARAH LACY - CROSS

1 CROSS EXAMINATION

2 BY MR. FRICK:

3 Q Ms. Lacy, it's your testimony that the statement that
4 you gave -- well, your take-home homework statement that you
5 gave to law enforcement back in August of 2019 is still
6 accurate.

7 A Yes.

8 Q You didn't change a thing.

9 A He told me he wanted me to, but no, it's all accurate.

10 Q Okay. So did you go talk to DSS in September and say,
11 "I made it all up, I was off my medication?"

12 A That's because he told me to.

13 Q You said it though, right?

14 A Yes.

15 Q Was he with you at that time?

16 A No. He was supposed to meet me at the police station
17 later that day.

18 Q Okay. And did you have an interview with Chester
19 Police Department on September 16th?

20 A Yes.

21 Q Do you recall telling them, "I exaggerated a little
22 bit?"

23 A No.

24 Q You don't recall that?

25 A No.

SARAH LACY - CROSS

1 Q Do you recall telling them in that interview, "Brad
2 never did anything?"

3 A When he told me to tell them that.

4 Q Do you recall telling them that?

5 A Yes.

6 Q Do you recall telling them, "Minor 1 wanted what her
7 mom and I had that she couldn't have."

8 A Yes.

9 Q Do you recall telling them that you physically abused
10 Bradley, Jr.?

11 A Yeah. I was told to and forced to.

12 Q You were forced to. Was Bradley Corlew with you that
13 day?

14 A He was some days.

15 Q The day you walked into the police department when you
16 gave that video statement, was he with you?

17 A No, he wasn't.

18 Q No. No one was with you that day except law
19 enforcement, correct?

20 A He was with me earlier that morning.

21 Q Uh-huh. When you sat down and talked with them that
22 afternoon. No?

23 A He was there outside.

24 Q He was there outside. Were you communicating with him?

25 A No.

SARAH LACY - CROSS

1 Q Because they took your cell phone away from you, didn't
2 they?

3 A Yes.

4 Q Okay. And you do not remember saying, "I exaggerated
5 on that written statement?"

6 A Nuh-uh.

7 Q All right. Let's talk about your plea offer. Do you
8 know exactly what you were charged with originally?

9 A The same as he was.

10 Q The same as he was. Criminal sexual conduct with a
11 minor first degree, correct?

12 A Yep.

13 Q What sentence are you facing on that?

14 A I have no idea.

15 Q But you said you think --

16 A But I know it's life.

17 Q -- you're getting life, right?

18 A Yeah.

19 Q So it's a life sentence, right?

20 A Yeah.

21 Q How about criminal sexual conduct with a minor second
22 degree?

23 A I believe it's all life sentences.

24 Q Okay. So it's your understanding that if you don't
25 cooperate with the State today that you will receive a life

SARAH LACY - CROSS

1 sentence.

2 A Yes.

3 Q Okay. In fact, there's more to it than that, isn't
4 there?

5 A Yeah.

6 Q Don't you have some charges that are to be dismissed?

7 A Yes.

8 Q Do you know how many?

9 A They are all to be dismissed and then they changed it
10 to two she had mentioned in the beginning.

11 Q Some 60 charges; is that correct?

12 A Uh-huh.

13 Q You also got a bond out of the deal, didn't you?

14 A Yes, sir.

15 Q Because you had no bond before you entered this plea,
16 correct?

17 A Yep.

18 Q And you've been out on bond as part of this deal since
19 September 10th, correct?

20 A Yep.

21 Q Of 2020.

22 A Yep.

23 Q Additionally the sentence you get you are parole
24 eligible, aren't you?

25 A Yes, sir.

SARAH LACY - CROSS

1 Q Would you be on the criminal sexual conduct with a
2 minor?

3 A Nope.

4 Q It's a pretty good deal, don't you think?

5 A Yep.

6 Q Well, you did, you took it, right?

7 A Yeah.

8 Q It's also not your first rodeo, is it? Don't you have
9 a conviction out of Florida?

10 A No, it's not a convicted.

11 Q You don't have a conviction?

12 A They dropped the case.

13 Q All right. So let's talk about August 20th. You go to
14 the Rock Hill City Police Department, correct?

15 A Uh-huh.

16 Q And tell them, "Brad has been beating me."

17 A Which he had.

18 Q Okay. In Rock Hill?

19 A No. I went to Safe Passages.

20 Q Right. Okay.

21 A And they had me meet in Rock Hill --

22 Q Uh-huh.

23 A -- where they were working out of their office.

24 Q Okay. Isn't it true that you told them in Rock Hill
25 that the last time it happened is a month prior?

SARAH LACY - CROSS

1 A It probably was, but you do as Brad says or you get
2 beat.

3 Q Well, how did you get away from him that day then?

4 A I ran my ass off.

5 Q You ran your ass off. Didn't you have a doctor's
6 appointment in Rock Hill that day?

7 A My daughter did.

8 Q Didn't you want Brad to go with you to a doctor's
9 appointment that day?

10 A No.

11 Q And the reason why you went to Rock Hill City Police
12 Department is because you were mad because he didn't go to
13 that doctor's appointment?

14 A No.

15 Q You were supposed to be an OBGYN, weren't you?

16 A Yes.

17 Q With Brad, right?

18 A Yes.

19 Q And he didn't go.

20 A Neither of us went.

21 Q And you were mad at him.

22 A I had a doctor's appointment with my daughter.

23 Q You just said you had one at OBGYN.

24 A They were double booked.

25 Q They were double booked. And you were expecting Brad

SARAH LACY - CROSS

1 to go, correct?

2 A Not to the daughter's.

3 Q But to the OBGYN, right?

4 A Yeah.

5 Q So you ran your ass to Rock Hill with him?

6 A No. He was there, and when I learned that he was there
7 I turned my ass around.

8 Q Isn't it true you got mad, you didn't go to the OBGYN
9 appointment because you wanted to have another child.

10 A No. He threatened me and I went to Safe Passages.

11 Q Saying that he had beat you a month earlier.

12 A He was going to beat me that day, I put in a police
13 report.

14 Q Did you go home that day -- or stayed in Rock Hill,
15 right?

16 A I stayed in Rock Hill. I never went back home.

17 Q And then after you got back home where did you go?

18 A I never got home.

19 Q Where have you been since August 23rd of last year
20 then -- or of 2019?

21 A Living in hotels and in jail.

22 Q You never went back in the house on Ella Street?

23 A Not to my knowledge.

24 Q You did not just testify that you met with Brad --
25 what, were you down in Columbia at that time? You said he

SARAH LACY - CROSS

1 helped you, right?

2 A I had my kids' godfather with me. He and I both had
3 threats first thing that morning on my phone.

4 Q And your decision was, "I'll just meet with him."

5 A No. I never met with Brad that day.

6 Q You didn't meet with him that day.

7 A No. I went to Safe Passages.

8 Q Right.

9 A And then I stayed with Safe Passages.

10 Q Stayed with Safe Passages.

11 A And then I went to the Chester Police Department.

12 Q Right. And then what did you do?

13 A I didn't meet with him.

14 Q Okay. Where did you lay your head that night?

15 A In a hotel.

16 Q What hotel?

17 A Hotel down in Columbia that my kids' godfather had got.

18 I do not know the name.

19 Q So August 23rd until you got arrested you were in a
20 hotel in Columbia?

21 A Yeah. And then I did meet up with him after, like a
22 few weeks.

23 Q Uh-huh. And y'all went on a road trip.

24 A Yeah. It wasn't immediately.

25 Q And you came back with him.

SARAH LACY - CROSS

1 A Yeah, and I was arrested.

2 Q And at no point during this road trip did you jump out
3 and try to get help.

4 A No. I know what would happen.

5 Q And you continued to maintain everything in this
6 statement is true and deny that you said you exaggerated.

7 A I did not exaggerate it, everything in that is true.

8 Q And you deny that you said to Nick Harris with Chester
9 City Police Department on September 16th, "I exaggerated in
10 that statement."

11 A I don't recall saying that.

12 MR. FRICK: Your Honor, at this time I've got a part of
13 the video I would like to play.

14 THE COURT: All right.

15 MR. FRICK: I need a little bit of time to get it set
16 up.

17 THE COURT: All right. You want to take a brief
18 recess? We'll take a brief recess. Ladies and gentlemen
19 don't talk about the case while you're on break, okay?

20 (The jury left the courtroom and a break was taken.)

21 (The jury returned to the courtroom.)

22 THE COURT: All right. The jury is back.

23 MR. FRICK: Thank you, Your Honor. At this time I
24 would like to play a snippet of the video to refresh the
25 witness' recollection.

SARAH LACY - CROSS

1 THE COURT: Okay.

2 (The video clip was played.)

3 Q Does that refresh your memory, Ms. Lacy?

4 A Yes, sir.

5 Q So it's not true what you testified to today, you have
6 given different statements.

7 A When he asked me to.

8 Q Where is he?

9 A I was with him that morning.

10 THE COURT: Ma'am, I can't hear you, you need to move
11 that microphone.

12 A I said I was with him that morning.

13 Q You know you weren't going home that day, didn't you?

14 At the very end you knew you were going to jail.

15 A I knew we were both going to jail.

16 Q And he wouldn't get you. What were you scared of?

17 Nothing. And, in fact, isn't it true that the reason why

18 you made this deal to save yourself is because once you

19 found out how much trouble you were in you knew you had to

20 cut a deal, isn't that true? Isn't that exactly while

21 you're up here today?

22 A No.

23 MR. FRICK: No further questions, Your Honor.

24 THE COURT: All right. Redirect?

25 REDIRECT EXAMINATION

SARAH LACY - REDIRECT/RECROSS

1 BY MS. LIVELY:

2 Q When you were with the defendant on your adventure
3 before y'all went -- before you went to the police that day,
4 what was the plan for y'all during that week?

5 A He claimed it was just to get me away so I could get
6 myself under control, but I later learned that it was to get
7 rid of evidence.

8 Q Was it to change your mind about what you had said
9 earlier?

10 A I think part of it was. But then he told me that if I
11 don't change it then his girlfriend was going to have
12 somebody beat me in jail if I didn't recant everything.

13 MS. LIVELY: No further questions.

14 MR. FRICK: Very briefly.

15 RECROSS EXAMINATION

16 BY MR. FRICK:

17 Q But you did say on the video you told the children to
18 lie, correct?

19 A What you just saw on there I had to say.

20 Q I'm talking about on your trip you told Brad, "Yes, I
21 told the children to lie;" isn't that true?

22 A Yes, under his coercion (sic).

23 MR. FRICK: No further questions, Your Honor.

24 MS. LIVELY: I would just ask that she be allowed to
25 finish what she was saying.

SARAH LACY - REDIRECT/RECROSS

1 THE COURT: All right. Finish what you were saying.

2 THE WITNESS: I said under his coercion. He told me
3 to say it.

4 MS. LIVELY: Okay.

5 THE COURT: All right. Thank you, ma'am, you can step
6 down. State can call its next witness.

7 MS. LIVELY: Yeah. Your Honor, may we approach for a
8 minute?

9 THE COURT: Yeah.

10 (A bench conference was held.)

11 THE COURT: All right. Ladies and gentlemen, the
12 lawyers were just telling me kind of how this afternoon is
13 going to play out. There is another video statement of
14 **Minor 2** who testified here earlier today, her video statement
15 is going to be -- it's already in evidence, it's going to be
16 published to you, the jury. The question is do you want to
17 take a -- it's 49 minutes long is what I was told.

18 MS. LIVELY: Correct, Your Honor.

19 THE COURT: And that will be it for the day. The other
20 witnesses are under subpoena for tomorrow, tomorrow morning.
21 So the question is, do y'all want to take a break before
22 then or you just motor on through?

23 (Some jurors answered to keep going.)

24 THE COURT: Sounds good. We're getting it set up.

25 (Break in proceedings.)

1 (The video interview of Minor 2 was played.)

2 THE COURT: All right. Anything else from the State
3 today?

4 MS. LIVELY: Not from the State, Your Honor.

5 THE COURT: All right. Thank you. Ladies and
6 gentlemen of the jury, that will be it for today, we're
7 going to go ahead and recess a little bit early today. I
8 want you back in your jury room -- 9:30 is going to be fine?
9 What time is your witnesses coming?

10 MS. LIVELY: My first witness will be here ready to go
11 at 9:30, Your Honor.

12 THE COURT: Okay. Y'all be ready to roll at 9:30.
13 Okay? Remember what I told you about what to do when you're
14 away from the courthouse, don't discuss this matter with
15 anybody, don't go up looking information on it, your
16 decision has to be based solely from the evidence received
17 in this courtroom. Okay? Thank you very much, have a great
18 evening, see you tomorrow morning 9:30.

19 (The jury left the courtroom.)

20 THE COURT: All right. Anything else for the day?

21 MS. LIVELY: No, Your Honor, not from the State.

22 THE COURT: Mr. Frick?

23 MR. FRICK: Nothing for today.

24 (Court recessed for the day and resumed on Wednesday,
25 September 1, 2020, at 9:30 a.m.)

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1 (The jury returned to the courtroom.)

2 THE COURT: All right. Good morning, ladies and
3 gentlemen. All members of the jury are present. The State
4 can call its next witness.

5 MS. LIVELY: Yes, sir, Your Honor. The State would
6 call Paula Stevens to the stand.

7 THE COURT: All right.

8 The witness, PAULA STEVENS, was first duly sworn and
9 Testified as follows:

10 THE COURT: Just have a seat there, you can lower your
11 mask or take it off. That's good. Thank you. Speak loud
12 into the microphone.

13 DIRECT EXAMINATION

14 BY MS. LIVELY:

15 Q Good morning. Please state your name for the record.

16 A Paula Stevens.

17 Q Where do you work, Investigator Stevens?

18 A With the Fort Mill Police Department in Fort Mill,
19 South Carolina.

20 Q And what are your duties there?

21 A As a First Sergeant with the Fort Mill Police
22 Department I'm assigned to investigations, and I also am a
23 task force officer with the United States Secret Service
24 Cyber Fraud Task Force. Typically what I do is I
25 investigate digital forensics.

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1 Q All right. And how long have you been doing that,
2 Investigator Stevens?

3 A Since 2016.

4 Q And about how many -- and this can be just a major
5 ballpark figure, how many different phone extractions or
6 phone dumps, as we refer to them, have you probably done in
7 your career?

8 A I don't know specifically in phones, but I do all
9 digital devices, so that can be computers, it could be
10 surveillance cameras, it could be Go Pro's, so roughly 500
11 devices to date.

12 Q And do you get specialized training in order to do
13 those types of extractions from digital devices, phones,
14 computers, whatever it may be?

15 A I do.

16 Q All right. Please tell the jury what kind of
17 specialized training have you in that regard.

18 A Today I have roughly 1,170 hours of advanced forensics
19 training. As a part of my duties with the Secret Service
20 Task Force, they send me and sponsor me to the National
21 Forensics Computer Institute where I study both mobile
22 device examination, computer forensics. In addition to that
23 also the Federal Law Enforcement Training Center, they also
24 provide training there as well. So I've also been certified
25 in Cellbrite, XRY, Blacklight, most of the leading forensic

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1 data extraction devices.

2 Q And would you please describe to the jury kind of how
3 Cellbrite works as an example of one of the procedures or
4 one of the programs you use?

5 A Yes, ma'am. So to gain an extraction from a mobile
6 device we often times use different softwares, one of the
7 leading soft wears is Cellbrite. And depending on what type
8 of data we're trying to get from a mobile device, whether it
9 could be just pictures, it could be videos, it could be
10 something like a timeline, we will connect it to the device,
11 we will get an extraction. And it could be something that
12 we call logical, which is what you see directly on the
13 device when you open up a device and look at; or it could be
14 a physical or a full file system, which would be all of the
15 hidden data, the things that are in databases that you don't
16 particularly see when you open up the phone. For instance,
17 how many steps you were walking when you held the device.
18 Did you turn the device sideways or did it light up, all of
19 the biometric devices available then. So we usually do
20 logical or a physical depending on what type of
21 investigation requires.

22 Q And have you actually done phone extractions for
23 different agencies here in the Chester County area?

24 A I have. And as part of the task force I assist all
25 over the State of South Carolina.

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1 MS. LIVELY: Okay. All right. Your Honor, at this
2 time the State would offer Investigator Paula Stevens as an
3 expert in digital forensics.

4 MS. BOULWARE: No objection.

5 THE COURT: All right, without objection so qualified.
6 Ladies and gentlemen, normally when a witness testifies in
7 court they normally testify about what they saw, heard,
8 smelled or something of the like. However, when a witness
9 is qualified as an expert in a particular field because of
10 training, expertise, occupation, skill, then that person can
11 testify in the form of an opinion. Okay? Now, just because
12 an expert gives an opinion doesn't mean you have to accept
13 it. Okay? That's something that you'll determine when you
14 consider the weight and all of the evidence when you start
15 deliberating your verdict. Okay? So I have qualified
16 without objection this witness as an expert in the field
17 of --

18 MS. LIVELY: Digital forensics.

19 THE COURT: -- in the field of digital forensics, so
20 she may be able to testify in the form of an opinion. Okay?

21 MS. LIVELY: Thank you, Your Honor.

22 BY MS. LIVELY:

23 Q Now, Investigator Stevens, were you contacted by
24 Chester City PD from Investigator Brian Sanders regarding a
25 request to execute a search warrant on a phone involving a

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1 defendant by the name of Bradley Corlew?

2 A Yes, ma'am.

3 Q And whenever you received this information as well as
4 the phone, what is the first thing that you did in regards
5 to documenting what you received and what your next step was
6 going to be?

7 A Photographing the device, finding out if there was a
8 pass code provided, and whether or not we had authority to
9 make the extraction.

10 Q Okay. So is one of the things that you're referring to
11 whether or not you have the authority to begin the
12 extraction as to whether or not a legal search warrant had
13 been issued for the phone?

14 A Correct, or consent provided.

15 Q Okay. Or consent provided, thank you. All right. So
16 when you received an item from the Chester City Police
17 Department, I'm actually -- it's been opened with consent of
18 defense.

19 MS. LIVELY: If I may approach, Your Honor?

20 Q I'm going to have you look at this briefly. I know you
21 see a lot of phones, so if you recall if you received an
22 item such as this that was actually extracted by you per
23 request?

24 A Yes, ma'am.

25 Q All right. And what is that item?

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1 A This is a silver Apple I-phone Excess Max.

2 Q All right. At the time whenever you received that, and
3 if it assists you for me to provide you with a copy of the
4 search warrant, based upon the information that you had, who
5 was the owner of this I-phone?

6 A Bradley Corlew.

7 Q Bradley Corlew. All right. So once you were able to
8 document the phone, take pictures of it, what was the next
9 step that you did?

10 A A full file system extraction was obtained since the
11 device pass code was provided, it was connected and then an
12 extraction was obtained and then processed.

13 Q And whenever an extraction is obtained and processed,
14 where does that extraction go?

15 A To -- it's downloaded to my external drive and then
16 it's transferred to my computer where I analyze it.

17 Q All right. Okay. So once that extraction takes place,
18 do you need the phone anymore?

19 A I do not.

20 Q All right. So at that point, where is all of the
21 information that was extracted?

22 A In the zip file, which is the forensic copy of the
23 phone.

24 Q And once you have the zip file with the forensic copy
25 of the phone, what do you do in your expertise as a digital

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1 forensics analyzer to determine what is on there, if
2 anything?

3 A At that point depending on what we're looking for, I
4 generally utilize two different softwares, because software
5 competing companies, they don't necessarily always parse out
6 exactly the same thing, so you try to gather all of the
7 information. So I'll take that extraction, the zip drive,
8 I'll load it into the software. The first one I used was
9 Magnet Axiom. And it will parse that software, it will run
10 through and it will take all of the information that is
11 there and it will put it in a human readable format so an
12 investigator can come along and they can look and see
13 whether or not evidence is particularly relevant to what
14 their investigation is looking for. In addition to that I
15 uploaded it to Cellbrite and examined that same gold
16 standard forensic copy in a competing software to make sure
17 and validate the things that I'm finding were the same.

18 Q Okay. And in this particular extraction, did you use
19 that axiom process?

20 A Yes, ma'am.

21 Q And were you able to actually extract some information
22 that as a digital forensics expert, I guess, you deemed it
23 as being interesting or something for further analysis?

24 A Yes, ma'am. Based on just the limited information that
25 I have before the investigation I tagged it so that the

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1 investigating officer can review it.

2 Q All right. So in regards to that I'm just going to
3 back up, you said what limited information. You were not
4 actively involved in the actual investigation of this case
5 other than dumping the phone, correct?

6 A Correct.

7 Q All right. So did you know about the allegations
8 against Mr. Corlew other than just the broad allegations?

9 A No, ma'am, just what was stated in the search warrant.

10 Q Okay. All right. And in regards to that, was that how
11 you in your expertise determined what was an appropriate tag
12 for certain things that you did?

13 A Yes, ma'am.

14 Q And how many items did you tag, if you remember, from
15 the phone?

16 A In the Cellbrite extraction I know that there were two
17 different live video streams, so it would have been, I
18 think, four tags that needed to be reviewed.

19 Q Okay. And in doing so once again you downloaded that
20 information to a separate device that could be used by
21 investigators here from the city police department, correct?

22 A Yes, ma'am.

23 Q All right. And was that provided as a part of your
24 investigation into what is listed as crime evidence? And it
25 looks like this particular envelope came from -- it didn't

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1 come from you, it came from Investigator Sanders. Does this
2 look familiar?

3 A Yes, that's from me.

4 Q This is from you?

5 A Yes, ma'am.

6 Q All right. This is State's Exhibit Number 4. And it's
7 not actually in here right this second, but the flash drive
8 that you provided, was it a 64 megabyte bit drive that was
9 actually given to the State through Mr. Sanders that has
10 your extraction on it?

11 A Yes, ma'am.

12 Q And it would have been inside this envelope?

13 A Yes.

14 MS. LIVELY: At this time, Your Honor, the State would
15 move State's Exhibit Number 4, which is actually a zip drive
16 that I have in my computer right now, however because of the
17 issues with downloading and having to pull up I went ahead
18 and put it in the computer.

19 Q How long does it take for Cellbrite to get uploaded
20 into a computer so we can sometimes look at stuff?

21 A The larger the memory of the phone the longer it takes.
22 So it could take anywhere from an hour for it to boot up,
23 depending on the operating system of the computer that was
24 trying to open it.

25 Q Okay. All right.

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1 MS. LIVELY: So, Your Honor, at this time I would move
2 State's Exhibit Number 4 into evidence.

3 THE COURT: Any objection?

4 MS. BOULWARE: Your Honor, yes, we would object to
5 that. We're not sure exactly what's being moved into
6 evidence as far as what kind of images or pictures or
7 anything.

8 THE COURT: All right. Objection overruled.

9 MS. LIVELY: Thank you.

10 (The phone dump was received as State's 4.)

11 Q All right. So the State's Exhibit Number 4, then, your
12 extraction is into evidence at this time. So I'm going to
13 have you, if you would -- I'm going to try to pull it up,
14 but first I want to have you describe in what you found that
15 you tag those items, what were those items that you found?
16 And you can describe for the jury what it was that you saw
17 and why you tagged them.

18 A In the first grouping of photographs with Apple devices
19 when you take a picture, if you have live photographs turned
20 on it's not actually just a single frame, it's actually a
21 short video clip so that you can go through and edit your
22 picture by frame to decide what angle and lighting, you
23 know, as the picture is being taken is the best
24 representative photograph, so it's a small little video
25 clip. There were, I think, four initially in the first

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1 grouping of an erect penis and a flash, and there is a couch
2 in the background with what potentially could be a child's
3 face behind the couch. I tagged that for consideration for
4 an investigator to examine. As well as an additional, I
5 think, four photos that had an erect penis with a blanket
6 over it, and then with the time stamp of the next photograph
7 it was the same time period. There were two children
8 underneath a similar blanket at the same time that
9 photograph -- roughly the same time that photograph was
10 being taken. So I tagged that to be considered as well.

11 Q And to be clear, Investigator Stevens, you don't know
12 who's erect penis that was in the picture.

13 A Correct.

14 Q Okay. All right. So in your experience as an expert,
15 did you -- based on what you've been trained in, was this
16 the type of information you would tag as being either of
17 interest or investigative concern for the actual
18 investigating agency?

19 A Yes, ma'am.

20 Q Okay. So are you trained to draw conclusions about
21 what was going on in those particular images?

22 A No, ma'am, just basically the collection of the images
23 themselves.

24 Q Okay. So basically the image in what you observed,
25 however you draw no conclusion.

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1 A Right.

2 Q All right. Now, in regards to other information that
3 was on the phone, was there pornography on the phone?

4 A Yes, ma'am.

5 Q And was there pornography that involved bondage?

6 A Yes, ma'am.

7 Q All right. And in regards to the bondage photos, would
8 it be where females were the ones that were either tied up
9 or bound in some type of way during a sexual act?

10 A Yes, ma'am.

11 Q All right. Were there visual images and pornography of
12 very young looking women that -- where it would say teen
13 porn as kind of the dot com at the bottom.

14 A Yes, ma'am.

15 MS. LIVELY: Your Honor, I'm going to try to actually
16 publish a couple of things to the jury, I don't know if it's
17 going to work. I've talked to Investigator Stevens.

18 Q You've actually visually seen these, uploaded it and
19 tagged them yourself, correct?

20 A Yes, ma'am.

21 MS. LIVELY: And I'm going to try to do that, Your
22 Honor, at this time, if I may publish this.

23 THE COURT: Okay. Move the TV screen. And, Ms.
24 Boulware, do you want to come over here so you can see?

25 MS. BOULWARE: I will do that.

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1 THE COURT: And Madam Witness, if you need to get down
2 you can do that, but just hang on.

3 (Break in proceedings.)

4 Q And while he's doing that I do want to ask you a couple
5 of more questions just to clarify for the jury. In the
6 images that you tagged you said that it was like little
7 short clip live videos, so would that be something that was
8 downloaded from the internet or was that something that the
9 user of the phone actually would have recorded?

10 A That would have been a user generated image.

11 Q Okay. And then the other items I was talking to you
12 about in the regards to the bondage, pornography and just
13 other pornography, were those images that was downloaded
14 from the internet?

15 A Those were downloaded from a public facing pornography
16 website.

17 Q Okay. So in your expert opinion, then, items that you
18 tagged would have been from a user, not necessarily who was
19 using it, but the user of the I-phone at the time those
20 images were taken.

21 A Correct.

22 Q All right. Can you see that, Investigator Stevens?

23 A Yes, ma'am.

24 Q Okay. So the first thing I wanted to have you just
25 explain to the jury if you would, please, we're looking at

PAULA STEVENS - DIRECT

1 what the -- what pulled up whenever you first pull up the
2 items in Cellbrite; is that correct?

3 A Yes, ma'am.

4 Q All right. Now, whenever you're talking about tags
5 that you were able to actually document for the
6 investigation, please explain to the jury -- let me go back.
7 So when it first comes up, what is this home view of what
8 we're seeing?

9 A Would it be all right if I approached the screen and
10 point it out there?

11 MS. LIVELY: Absolutely, sure, please do. May she step
12 down, Your Honor?

13 THE COURT: Yeah. Wear your mask, though, and then
14 when you get up here you won't have to so you can talk
15 louder.

16 MS. LIVELY: Thank you, Investigator Stevens. Your
17 Honor, I'm going to move the microphone so that way she can
18 have that.

19 Q This will kind of help you to make sure the jury can
20 hear you.

21 A Okay. So when you first process an extraction that's
22 been collected and you put into Cellbrite you come to the
23 home screen, and it has worked through that whole extraction
24 and prepared it for you to examine. And the options that
25 you have you, you have your home screen. You have a

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1 timeline, which allows you to go in and actually look at the
2 device step by step, moment by moment. You have analyzed
3 data, which is your file system, you can go directly
4 in (inaudible.) You have Insight, which is Cellbrite's
5 version of Tips (phonetically), and you have tags. This is
6 where any information that I feel should be reexamined is
7 placed in the tag section. So you have the overall
8 extraction here, information about who did the extraction,
9 information about the device, and then you have information
10 from here on down about -- that you can click on and
11 visually examine where it could be call out, it could be
12 text messages, it can be photographs, any of those. All of
13 that information is presented for the investigator to
14 quickly access.

15 Q Okay. Thank you. And if you would, just so that I
16 don't mess this up, I would rather have you try to do it,
17 would you please in regards to where to go next where we can
18 actually pull up the tags that you provided to us in the zip
19 drive?

20 A So the tags are going to be in the tag folder right
21 here.

22 THE COURT: Madam witness, if you don't mind lowering
23 your mask so they can understand you better. The court
24 reporter has got to make a record, too, and he can't read
25 lips. Thanks.

PAULA STEVENS - DIRECT

1 A So I went to the tag section and I double clicked on
2 what was labeled as interesting, so something to be
3 considered. And these are the videos that are tagged, and
4 they're actually images that, as I said before, Apple
5 devices, when they are in the live photos they actually are
6 doing small video clips. So even though a photograph is
7 being taken it's storing it as a video.

8 Q And let me just ask you this, because obviously -- I
9 have an I-phone. So if I take a picture now one of the
10 newer things is is that you can take a picture but if I put
11 my finger on it and hold it it's kind of got like about a
12 three or four second movie.

13 A That's correct.

14 Q Okay. So that's what you're talking about?

15 A That's a live video.

16 Q Okay. So even though I'm not hitting a video there is
17 a small video that is taken.

18 A Correct.

19 Q All right. Thank you very much. So the next thing is
20 whenever you play these, the first grouping that you're
21 talking about, what was the first grouping? What did you
22 visually identify?

23 A That first grouping was the first one that I described
24 that was an erect penis with a couch in the background with
25 what appeared to potentially be a child's face behind the

PAULA STEVENS - DIRECT

1 arm of the couch.

2 Q Where would I click in order to have -- if we were
3 going to pull this up, would I click on this?

4 A Yes. You would double click the image.

5 Q Do you have to have a certain --

6 A It should be playing.

7 Q Okay.

8 MS. LIVELY: Your Honor, I may have to publish this at
9 a later time once I can figure it out. I don't want to
10 delay with the jury.

11 THE COURT: Okay. Just do --

12 MS. LIVELY: She's described it in her testimony and
13 that might be what I have to do.

14 THE COURT: Okay.

15 MS. LIVELY: Thank you.

16 THE COURT: All right.

17 Q Okay. If you want to -- thank you very much, if you
18 will go back to your seat. Now, Investigator Stevens, in
19 regards to the information that was pulled off of that
20 phone, if someone is, you know, pretty phone savvy, are they
21 able to delete some of the images from their phone?

22 A Yes.

23 Q And in situations especially with an I-phone, how
24 difficult is it to go back and try to retrieve that
25 information?

PAULA STEVENS - CROSS

1 A It varies. Sometimes when you delete photographs they
2 go into an actual deleted folder, they typically aren't
3 deleted until 30 days later, or you could go into that
4 folder and force delete it, and then once those videos or
5 images are deleted and written over you cannot recover them.

6 Q Okay. Thank you.

7 MS. LIVELY: Answer any questions that the defense may
8 have.

9 THE COURT: All right. Ms. Boulware?

10 CROSS EXAMINATION

11 BY MS. BOULWARE:

12 Q Good morning, Investigator Stevens.

13 A Morning.

14 Q So your job basically is to ID types of images such
15 as -- or types of files, excuse me, data such as images,
16 texts, videos, you say what kind of files they are; is that
17 correct?

18 A Yes, ma'am.

19 Q Okay. But you don't know who they are or the context
20 of the files.

21 A That's correct.

22 Q And you -- as the solicitor said, you didn't
23 investigate this case in any other way other than what
24 Chester City Police provided to you.

25 A Yes, ma'am.

PAULA STEVENS - CROSS

1 Q Okay. Have you ever failed to appropriately tag a file
2 or at some point inappropriately tag the file?

3 A No, ma'am.

4 Q Are you sure?

5 A I'm sure.

6 Q Okay. Even though you don't know the context of it.

7 A It's not my job to investigate what's relevant to a
8 particular investigation, it's my job to provide the data so
9 that the investigator has it so that they can investigate
10 it.

11 Q But you're making that decision.

12 A No, ma'am. I'm providing the data in a readable format
13 for the investigator.

14 Q But you're making the decision for them as to what's
15 relevant --

16 A No, ma'am.

17 Q -- I believe you testified.

18 A No. What I did is I tagged items for them to consider
19 during a cursory search.

20 Q By relevancy.

21 A It could potentially be relevant.

22 Q Okay. Let's talk about the teen porn website, the teen
23 fidelity. That's a brand trademarked by the federal
24 government, is it not, or regulated by the federal
25 government.

PAULA STEVENS - CROSS

- 1 A Yes, ma'am.
- 2 Q That's a legitimate website.
- 3 A It is.
- 4 Q It's not actual teens, it's just called teens.
- 5 A I don't have the ability to discern who is prepubescent
- 6 or not. But what I do say is where the image was downloaded
- 7 from, the web address that it came from and just any other
- 8 information regarding the digital data surrounding the
- 9 image.
- 10 Q But it's a legitimate website.
- 11 A It is a legitimate website, a public facing website.
- 12 Q Okay. You don't also know who had possession of the
- 13 phone at all times.
- 14 A Correct.
- 15 Q If he's had that phone for a year, there's no telling
- 16 how many months the phone has been in somebody else's hands.
- 17 Anybody could have downloaded those images on the phone.
- 18 A As long as they had access to his pass code.
- 19 Q Okay. It's possible to do that if you have access to
- 20 other people's accounts, iCloud accounts?
- 21 A Yes.
- 22 Q Yeah. So even though the name on the iCloud account is
- 23 Bradley Corlew, we don't know that he's the one that used
- 24 that account, do we?
- 25 A At that time I cannot say.

SUSAN LAMB, M.D. - DIRECT

1 MS. BOULWARE: Beg the Court's indulgence.

2 THE COURT: Yeah.

3 (Break in proceedings.)

4 MS. BOULWARE: No further questions.

5 THE COURT: All right. Any redirect?

6 MS. LIVELY: No, Your Honor. May this witness be
7 excused?

8 THE COURT: Thank you, ma'am, you can step down, you
9 can be excused. The State can call its next witness.

10 MS. LIVELY: The State calls Dr. Susan Lamb to the
11 stand.

12 The witness, SUSAN LAMB, M.D., was first duly sworn

13 And testified as follows:

14 DIRECT EXAMINATION

15 BY MS. LIVELY:

16 Q Good morning, Dr. Lamb.

17 A Good morning.

18 Q Please tell the jury what your -- where you're
19 currently employed.

20 A I'm Dr. Susan Lamb. I'm employed by Prisma Health
21 Midlands at the Children's Hospital.

22 THE COURT: Can you move that microphone up to you?

23 Q There you go. All right. And what are your job duties
24 there?

25 A So as a child abuse pediatrician there I evaluate

SUSAN LAMB, M.D. - DIRECT

1 children who are referred due to concerns of abuse or
2 neglect. I see children in clinic and in an outpatient
3 setting, and I also evaluate them when they're in the
4 hospital, either the emergency department or they've been
5 admitted.

6 Q Okay. And what is your educational background and
7 training in the -- specifically in child abuse and neglect
8 medical examinations?

9 A Certainly. So child abuse and neglect is a
10 subspecialty offer of pediatrics. So I did my medical
11 school training at the University of Virginia, and after
12 graduating there in 2009 I went on to a pediatric residency
13 and became board certified in pediatrics. Then I did a
14 three year fellowship in child abuse and neglect pediatrics
15 and became board certified in child abuse and neglect
16 pediatrics as well as my general pediatrics board
17 certification.

18 Q And is your board certification in pediatrics up to
19 date and still good here in the State of South Carolina?

20 A It is.

21 Q How about your board certification in child abuse and
22 neglect medical examinations?

23 A Yes, it is up to date as well.

24 Q And have you ever been qualified as an expert in the
25 field of child abuse and neglect medical examination?

SUSAN LAMB, M.D. - DIRECT

1 A Yes, I have.

2 Q About how many times?

3 A I stopped counting at 100.

4 MS. LIVELY: Your Honor, at this time the State would
5 offer Dr. Susan Lamb as an expert in child abuse and neglect
6 medical examinations.

7 MR. FRICK: No objection, Your Honor.

8 THE COURT: All right. Without objection, so
9 qualified. Ladies and gentlemen, remember what an expert
10 can testify to as to opinions.

11 MS. LIVELY: Thank you, Your Honor.

12 Q Let me just go over some brief overview as to what you
13 do involving a child in comparison to an adult when they
14 come in for a medical examination. So in a sexual assault
15 exam of an adult, don't go through the whole thing, but
16 basically what does that entail in regards to an adult being
17 examined?

18 A So when there's concerns of sexual abuse or sexual
19 assault the first thing we determine is whether evidence
20 needs to be recovered, so is it kind of in that time frame
21 where we could get DNA evidence from their body there. If
22 that is the case then special nurse examiners come in,
23 they're trained, they swab everything. It takes over four
24 hours to perform those evaluations, and then that evidence
25 is sent off to a lab, usually SLED here in South Carolina.

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1 You also get a history from the victim there, so they kind
2 of tell you what has gone on, what has occurred, that
3 directs where you're going to look. It also involves photo
4 documentation of any injuries, both in the genital portions
5 of the exam, but anywhere on their body. So if there's
6 suction marks, hickeys, bites, anything like that, that all
7 kind of goes in. And then with adults it's all about their
8 consent. So some victims don't feel comfortable going
9 forward with prosecution, and that's kind of up to them.
10 Some do feel comfortable, some kind of don't feel
11 comfortable right then but do later on. So it's a kind of
12 back and forth depending on what an adult victim feels
13 comfortable with or wants to do at that time. It always
14 involves law enforcement, you know, if there are charges or
15 things going on there. But that obviously differs when
16 you're talking about a child.

17 Q Okay. Thank you, Dr. Lamb. And now, in regards to a
18 child, let me just ask you legally and based upon your
19 medical training, can a child of the age of ten consent to
20 any kind of sexual act?

21 A No. So as far as a child's development, their ability
22 to understand what sexual contact means, what they are
23 consenting to, their brain is not developed to that extent.
24 They also have no context about what's going on, what
25 they're being asked to do or coerced to do. So that's why,

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1 you know, we have kind of -- legally they have ages of
2 consent, but we also look at each child and kind of their
3 development and such. And so at the age of ten they can't
4 understand what they're being asked to do.

5 Q Now, is there different types of equipment that you use
6 when you're doing a -- I'll call it a sexual assault
7 examination, but basically a forensic medical examination of
8 a child where there is an allegation of possible sexual
9 assault?

10 A So my exams, because there's some concern of
11 maltreatment before we get started, they're always head to
12 toe and include a genital exam. The only real difference
13 for us is we know that if there are any injuries or anything
14 that we're seeing we need to photo-document those so that
15 the child doesn't have to undergo multiple exams. It would
16 be very traumatic for a child to have to have several
17 sequential exams, and so we make sure that we take good
18 photo documentation of any injuries that we find, and also
19 document them in the medical report so that the children
20 aren't re-traumatized. But no other real special equipment
21 is needed. If you go to your pediatrician like the head to
22 toe physical exam, looking at all of the skin, looking at
23 the outside of their body, that's really what we're doing.
24 We're just taking our time and doing it more thoroughly and
25 making sure that we document to a higher kind of standard

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1 because of the allegations.

2 Q Okay. And what is a culpascope?

3 A So a culpascope is a piece of equipment that can be
4 used to do a genital exam. Essentially it's a giant light
5 and magnifying glass there, and so -- some of them are quite
6 bulky and large so sometimes we use camera equipment to
7 simulate that, but it's all under that area of culpascope.
8 Adult women, when they go see their OBGYN and they want a
9 real close-up picture, they use culpascope there. They can
10 be large, they can be small, but it's essentially just a
11 light source and a magnifying glass so that we can see any
12 injuries, any defects in the skin, kind of anything there.

13 Q Okay. And once that, you know, examination and the
14 light and magnification is on the genital area, what
15 specific parts of the genitalia for a female child are you
16 looking alternate?

17 A Certainly. So we're looking at kind of everything from
18 the outside in. We're looking at the labia majora, kind of
19 those outer lips; the labia minor, which are the smaller
20 ones that come together to form the clitoral hood; the
21 clitoris, looking at the urethral opening; and then the
22 vaginal opening, the tissue around there. We don't do an
23 internal exam, it's not necessary unless there's active
24 bleeding or you see something kind of in the vaginal
25 opening. We can just separate the labia majora, kind of

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1 those outer lips. And you can see the hymen rimming the
2 vagina, the vaginal opening and all of that tissue quite
3 easily without needing to insert anything into a female
4 child.

5 Q Okay. And what exactly is the hymen?

6 A So the hymen is something about which there's many
7 myths, so it's what people commonly think of as virginity.
8 So the hymen is a rim of tissue around the vaginal opening.
9 And so most people believe that it's like a covering over a
10 drum, and when you have your first sexual encounter, a penis
11 or something goes through it and it pops your cherry and
12 tears and you're no longer a virgin, but that's not true.
13 It's a thin rim of tissue around the vaginal opening,
14 there's always a hole there. Because if you didn't have a
15 hole there, the first time a female got her menses nothing
16 would be able to flow out, and so we would have to
17 surgically go in and create a hole so that she could have
18 her menses. And so that's an area of tissue that when
19 there's insertion into the vagina sometimes we're able to
20 see injuries, but it is very elastic and it's the same
21 tissue as the inside of your mouth, so it heals very rapidly
22 without scarring. I know you've all, you know, had that
23 time where you bite the inside of your mouth and it's
24 bleeding and it's painful, and then two days later it's gone
25 and there's no scar, no nothing there. And so it's a part

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1 that we look at for injury, but it's also a part of the body
2 that is made for kind of insertive penetration because
3 that's how you make babies, and then babies coming out, and
4 so it's very elastic and it heals very rapidly.

5 Q Okay. Now, when a child is actually referred to you at
6 the Metropolitan Child Advocacy Center, which is also what
7 you do with Prisma Health, what comes along prior to that
8 child actually walking into your office? What do you get
9 from investigators?

10 A Certainly. So we get referrals. They can come from a
11 variety of sources; DSS, law enforcement, the court systems,
12 a pediatrician's office, so where we get the referral from
13 kind of determines what information we have. Sometimes we
14 have an incident report, an interview of the child, like
15 lots of information. Sometimes we have two pages and two
16 lines. And so we just kind of go off of that information,
17 and then, of course, when they come we get much more history
18 from the caregiver from the child themselves.

19 Q And in when you received that information, does it help
20 you to know in regards to your requirements as the doctor
21 what somewhat of a medical history is for that particular
22 child?

23 A Sometimes it's helpful. So if there's allegations of
24 skin findings and we need to get pediatrician's records to
25 make sure that we know if the child has any medical issues.

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1 If there's concerns for a sexually transmitted infection
2 then we need to get those records. If there was law
3 enforcement involvement and we don't have the incident
4 report, we need to get that. So it helps kind of guide us
5 what pieces we're going to need to pull in outside of just
6 what we get from that medical visit with the caregiver and
7 the child.

8 Q And is the purpose of your examination still despite
9 the medical history to remain objective based upon what you
10 have to look for medically in examining the child?

11 A Certainly. So one of the reasons that we don't see
12 patients regularly, like I'm not their pediatrician, is
13 exactly so that we can base it on the science and be as
14 objective as possible about what's occurring. It's hard to
15 be objective when you know someone personally when you've
16 been their pediatrician or you've seen them, so we kind of
17 are set a part in our subspecialty so that we can be
18 objective. We also keep up to date on all the scientific
19 literature, everything going on in the field so that we can
20 make the best medical decision, medical diagnoses that we
21 can. That's kind of a cornerstone of our profession.

22 Q And since you are under that umbrella of child abuse
23 and neglect specialty, are you looking to specifically find
24 that abuse occurred, or are you objectively looking at what
25 you can see based upon your experience may have happened to

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1 the child?

2 A Certainly. So it's always, you know, a good day when
3 we find out that it's been an accident or it's a medical
4 cause or it's something else. This isn't a diagnosis that
5 we make lightly because we know everything that goes along
6 with it; implications for the family, for the community, for
7 the child themselves. So we keep statistics on this fact,
8 and we as a medical team, and then myself as one of the
9 providers, we average finding abuse or neglect about a third
10 of the cases that are referred to us. So if you flip that
11 around, about two-thirds of the cases we don't make that
12 diagnosis. There's some other cause or something --

13 MR. FRICK: Your Honor, I'm going to object to this as
14 bolstering.

15 THE COURT: Objection overruled.

16 Q Okay.

17 A -- in that case. So it's something that we take very
18 seriously.

19 Q Okay. And in regards to doing these medical exams of
20 the children, are you a mandated reporter of abuse?

21 A Certainly. So as a medical provider in the State of
22 South Carolina we're mandated reporters.

23 Q Okay. And so if you do in your expertise as a child
24 abuse neglect pediatrician and through your experience
25 determine that the injuries or what you're seeing with a

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1 child would have been inflicted, are you required to report
2 that?

3 A Yes, I am.

4 Q Now, let me go specifically to the -- to why you're
5 here today. Did you have the opportunity back in October of
6 2019 to see a child by the name of Minor 1

7 A So she was seen at our practice. She was seen by one
8 of our nurse practitioners who was training with me at the
9 time. So the nurse practitioner did the exam but I reviewed
10 everything and signed her note, looked at all of the images,
11 the history and such. So yes, we saw her. I personally was
12 not the one doing her physical exam.

13 Q Okay. I'm sorry, I did misspeak. I have it right here
14 that you weren't the medical provider, however you're the
15 supervisor. And is that standard procedure for you to --
16 can you do them all, Dr. Lamb?

17 A No. So we have a four person team there, and before
18 someone is allowed to do child abuse forensic evaluation; a
19 nurse practitioner, a pediatrician, they have to apprentice
20 with a child abuse pediatrician for 150 exams there, which
21 means that we're reviewing everything that we do. We're
22 looking at all documentation, we're reading all of their
23 assessments and plans and cosigning. So Shelby Brady, who
24 is the nurse practitioner, was in her apprenticeship with
25 us, so I was reviewing everything at that time. But no,

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1 there's unfortunately more work than I personally can see.

2 Q And is this a procedure that is used in the field and
3 is accepted in regards to how you review and supervise
4 someone who is underneath you?

5 A Yes. So for the whole State of South Carolina there's
6 an overarching body called the South Carolina Child Advocacy
7 Medical Response System, and this is mandated from kind of
8 the state legislature down, that this is how we train
9 providers and how they're allowed to practice if they aren't
10 specifically trained as a subspecialist in child abuse and
11 neglect.

12 Q Thank you, Dr. Lamb. Did you bring the reports with
13 you -- I'll just go ahead and jump to both of the children
14 involving a Minor 1 as well as Minor 2 that were
15 seen at the Metropolitan Children's Advocacy Center?

16 A Yes. I have the files with me.

17 Q Okay. I'm going to then refer you to one that I just
18 mentioned, a Ms. Minor 1 Can you please tell the
19 jury at the time -- first of all, what is her date of birth
20 and her age at the time whenever she came to your facility?

21 A And may I refer to my report?

22 Q Please do, yes.

23 A Okay.

24 Q And also I can show you what's been marked as State's
25 Exhibit 1, you can use it to refresh your recollection if

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1 you need to, as well as State's Exhibit 20, which I will ask
2 you about that as well in just a few moments.

3 A Okay. So Minor 1 came to our clinic, it was on
4 10/16/2019, her date of birth is , so she was 11
5 years old when she came to see us.

6 Q All right. And based upon the referral, what was it
7 that you were -- or was she to be evaluated for?

8 A So there were concerns for multiple forms of abuse and
9 neglect when she was referred to us. She was referred due
10 to concerns for physical abuse, neglect, emotional abuse and
11 sexual abuse. So the referral information that we had
12 received delineated that all of those were concerns
13 regarding Minor 1

14 Q All right. And if you could please tell the jury after
15 reviewing the report what the actual findings were in
16 regards to Minor 1

17 A So Minor 1 was diagnosed as having experienced
18 sexual abuse there and also being exposed to an environment
19 where there was physical abuse and other inappropriate
20 behaviors going on.

21 Q And once again from what you had testified to earlier
22 at the age of 11 was whether or not she was consenting to a
23 sexual act, was that something that you consider in these
24 particular cases?

25 A So at the age of 11, you know, she is not old enough to

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1 consent to a sexual encounter. We do perform an adolescent
2 questionnaire kind of based on if the children look like
3 they're kind of acting more like teenagers at that time, and
4 it does have questions about engaging in any consensual
5 sexual activity. So we did ask her about that.

6 Q Okay. And I'm actually going to refer you to, I
7 believe it's on the top, it's State's Exhibit Number 20 or
8 21.

9 A 20.

10 Q 20. All right. Don't read that out to me, but do you
11 recognize that questionnaire?

12 A Yes. So this is the adolescent questionnaire that we
13 give any of our teenagers.

14 Q Okay. And was that adolescent questionnaire, is it
15 documented that it was filled out by Minor 1

16 A Yes. So these are given to the teenagers to fill out
17 when they're back in the exam room by themselves, and
18 they're filled out only by themselves. If for some reason
19 there's a literacy concern or a child, you know, has trouble
20 writing, we write on the form if the questions are asked
21 verbally and someone else is filling it out for them. But
22 this is in her handwriting, she filled that out herself.

23 Q Okay.

24 MS. LIVELY: Your Honor, the State would move to
25 introduce State's Exhibit Number 21 into evidence at this

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1 time -- I'm sorry, 20.

2 MR. FRICK: Objection to be cumulative and under 403.

3 THE COURT: All right. I make the finding that it is
4 more probative than prejudicial under Rule 403 so I will
5 allow it in. Objection overruled.

6 (The questionnaire was received as State's 20.)

7 Q I apologize, what was the number again?

8 A It's 20.

9 Q It is 20.

10 MS. LIVELY: So that would be State's Exhibit Number 20
11 for the record.

12 Q And in regards to the questionnaire that she filled
13 out, would you please tell the jury what she disclosed in
14 regards to any potential sexual contact that she had had?

15 A Certainly. So our question reads, "Have you ever had
16 sex because you wanted to there?" And she circled -- it's a
17 yes or no, they can circle, so she circled no. But in the
18 line -- we always have a line so they can make comments
19 there, she stated, "But I have been sexually abused."

20 Q Okay. And I'm going to retrieve that from you. Now,
21 what were the actual -- I know you've talked about diagnoses
22 and things that you have to do as a medical doctor. In
23 regards to what you actually physically found with Minor 1
24 if you could please tell the jury what that was.

25 A So Minor 1 had a normal genital exam, normal physical

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1 exam. We did testing for chlamydia, gonorrhea, other
2 sexually transmitted infections, and all of that was
3 negative or normal as well.

4 Q And the fact that her genital exam was normal, how do
5 you reconcile that with the history that's provided about
6 possible repeated sexual penetration?

7 A So that is absolutely consistent with what she said and
8 what the findings were. In the field of child abuse we do a
9 lot of research. And so research has shown us that children
10 who report multiple penetrative acts -- so there's a study
11 of 500 girls reporting greater than ten penetrative acts,
12 penile vaginal penetration, and 86 percent of those children
13 had normal exams. So by and large the majority of children
14 will have normal exams even if they have experienced
15 repeated penetration. And that's, you know, because of what
16 the reasons that I alluded to before about the hymen and the
17 issues being elastic and healing so rapidly.

18 Q Now, let me move to the next child that was seen at
19 your agency, and that would be a Minor 2 Now, who was
20 the one that actually did her medical examination?

21 A So I did Minor 2's medical evaluation. I was the
22 medical provider that day.

23 Q Okay. I'm going to --

24 MS. LIVELY: May I approach, Your Honor?

25 THE COURT: Yes.

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1 Q Okay. I'm going to switch with you. This has been
2 marked as State's Exhibit 22 for ID purposes for you to
3 refer to in case you need to. Do you also have your reports
4 with you, Dr. Lamb?

5 A I do.

6 Q Thank you. Now, when did you get to actually see

7 **Minor 2**

8 A So **Minor 2** was seen on 9/6/2019.

9 Q Okay. Sorry, that's different than my record.

10 A I am sorry, that is the referral date. 10/3/2019.

11 Q Okay.

12 A Sorry, I've got a number of dates here.

13 Q That's fine. Thank you. And what's her date of birth?

14 A Her date of birth is , so she was 11 years old
15 when she came to see me.

16 Q Okay. So she was 11 years old. And just tell the
17 jury, do you remember after you started reviewing your

18 report of **Minor 2** do you remember who this child was?

19 A Yes.

20 Q Okay. Tell the jury, you know, what you remember about
21 **Minor 2**

22 A So **Minor 2** was very sweet. She was kind of a young 11
23 as opposed to 11 or 12 year olds that are kind of like
24 teenagers or acting like a teenager, she still was kind of
25 clearly a child there. And so, you know, very sweet but

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1 more childlike, more akin to like an eight or a nine year
2 old in the way she would describe things, the way she would
3 talk about things, her comfort level with sensitive topics
4 or questions there.

5 Q Okay. And I'm going to refer you back to **Minor 1**
6 in regards to the adolescent questionnaire that's in
7 evidence as State's Exhibit Number 20. Was **Minor 2** who was
8 also 11 when she came to you, was she provided with an
9 adolescent questionnaire to fill out?

10 A No. So 11, 12 -- we definitely give an adolescent
11 questionnaire from 13 and up, but at 11 or 12 we kind of
12 assess their development. And if they seem like they're
13 acting like a teenager, responding like a teenager, if
14 they're acting or responding more like a child the questions
15 just confuse them because this isn't even on their radar
16 there. So we may still ask them some verbal questions but
17 we don't provide them with a whole adolescent questionnaire.
18 It asks about drug use, posing for sexual videos, suicidal
19 ideation, sexual activity. So it's a lot of adolescent
20 issues that if they're acting more like a child just don't
21 compute for them and just confuse and upset them.

22 Q So she was not given one.

23 A No, she was not.

24 Q All right. And during the examination, please tell the
25 jury if you conducted the examination based upon how we were

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1 discussing earlier in regards to her genital and a full body
2 scan.

3 A Yes. So she had the full evaluation, she had a genital
4 exam performed and then photo documentation of her genital
5 exam.

6 Q And I forgot to ask you this, I apologize. In the
7 referral to the Metropolitan Child Advocacy Center for the
8 exam, what were the things that were triggered for you to be
9 looking for -- possibility of looking for in regards to her
10 medical exams?

11 A Certainly. So when we got this referral the concern
12 that was listed was sexual abuse. The referral source
13 stated that there had been -- that the mother of this child
14 had reported concerns of sexual abuse by herself, the
15 mother, as well as her fiance. And so that was kind of the
16 two lines we got about why there were concerns for this
17 child.

18 Q Okay. But you have no knowledge about who or what is
19 going on other than just the referral for medical purposes.

20 A Yes. So the medical referral that we got stated that
21 DSS and law enforcement were involved, that we knew that
22 there was concerns possibly for domestic violence
23 because mother -- the agency that kind of referred them
24 works with mothers of domestic violence, so we had that
25 knowledge going in. But all we were told were kind of the

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1 two lines that mother had made a statement to someone at
2 kind of the domestic violence shelter regarding sexual abuse
3 concerns of Minor 2 and her siblings.

4 Q All right. So at the time that you did your
5 examination of Minor 2 did you document and come up
6 with a medical finding in regards to her condition?

7 A Yes. So on Minor 2's exam as, you know, compared to
8 Minor 1's , she actually did have a healed injury that was
9 diagnostic of penetration into the vagina. So, you know, in
10 that 86 percent are normal, that also -- that leaves
11 14 percent that can have abnormal exams. If it's fresh
12 injuries it's bruises, it's lacerations, it's bleeding,
13 abrasions there. However, if it's a healed injury,
14 essentially what happens is there was a laceration through
15 the hymen, and then instead of coming back perfectly healed
16 together it gaps open like this, and so there's a little
17 piece of missing tissue that we can see there. And so in
18 Minor 2's case there actually was a piece of missing tissue
19 that is indicative of penetration into her vagina.

20 Q Okay. And based on your -- it being a child abuse
21 medical examination expert as well as a pediatrician, if a
22 child is missing a piece of their hymen at the time of the
23 penetrating injury, would the child -- is it likely that the
24 child would bleed?

25 A Yes. So for a piece to be missing it means that when

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1 that penetration occurred the hymen was lacerated all the
2 way through that tissue. And it's just like the tissue on
3 the inside of your mouth, like if you bite it and that
4 tissue is open it's painful and it's bleeding at the time.

5 Q And in this particular case with Minor 2 even though it
6 healed, there was medical evidence still remaining that she
7 had been penetrated in her vagina.

8 A Yes.

9 Q Is there any way to tell whether or not it happened
10 once or more than once?

11 A No. There's no way to tell. The only way we can tell
12 is unfortunately when we see kids when they've been abused a
13 second time, and so we have photos from the first and then
14 the second and you can tell that, you know, if there are
15 injuries both times they're in different places. But
16 because we were only seeing her in one time, you know, we
17 can't tell if there were multiple events or which event
18 would have resulted in this injury.

19 Q Okay. Can you tell how old the injury is?

20 A So I know it's greater than two weeks. We have good
21 data on how rapidly things heal there, particularly from
22 kids, teenagers, adults who come in with sexual assault. So
23 we see them in 24, 72 hours, then we follow them out and
24 make sure that things heal, so that's something we routinely
25 do. So we know that about by two weeks with all of the

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1 injury will have healed. But whether it's weeks, months, a
2 year or more, that I can't tell, I can just say that tissue
3 is missing and it's healed.

4 Q Yes, ma'am. Thank you. And when you see an injury, a
5 penetrating injury to the vagina, is there a possibility
6 that there could be history that would explain this other
7 than some type of a sexual assault?

8 A So it is possible. We have had some unusual cases, but
9 what has to occur is you have to have a history of a
10 penetrating injury to a child's genitals. And so these are
11 generally the cases that we see in the ER and the parent
12 comes in with some bloody object saying, "I know this sounds
13 crazy, but." An example would be a little girl who thought
14 she could extend the banister as she was sliding down it by
15 putting a pool cue, like you use for a pool table, onto it
16 and she literally slid herself directly onto the pool cue
17 there. And so, you know, she's screaming, she's bleeding,
18 911 is called, and we literally have the bloody pool cue and
19 the parent says, "I know this sounds crazy, but." So it has
20 to be that kind of direct penetration into the genitals to
21 reach the vaginal opening because it's kind of set back.

22 Q Okay. Thank you. So based upon no history of some
23 type of an emergency injury to Minor 2 and based upon
24 your experience and your expertise as a child abuse and
25 neglect medical examiner and pediatrician, what were your

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1 medical findings and conclusions and diagnosis of Minor 2

2

3 A Certainly. So she was diagnosed as having experienced
4 sexual abuse, specifically blunt penetrating force trauma to
5 her genitals.

6 MS. LIVELY: Thank you so much, Dr. Lamb. Please
7 answer any questions the defense may have for you.

8 THE COURT: Mr. Frick?

9 MR. FRICK: Thank you, Your Honor.

10 CROSS EXAMINATION

11 BY MR. FRICK:

12 Q Good morning, Dr. Lamb.

13 A Good morning.

14 Q So when you examined Minor 1 you used the scope that
15 you talked about?

16 A Yes, we did.

17 Q Okay. So it's a close-up examination.

18 A Yes.

19 Q It was a thorough examination.

20 A Yes.

21 Q And you didn't notice any evidence of injury, correct?

22 A Correct. She had a normal exam.

23 Q And, of course, that doesn't mean that nothing happened
24 but it doesn't mean that it didn't happen either, right? It
25 could be either way, correct? You didn't notice anything.

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1 A So a normal exam is not definitive of whether something
2 happened or not.

3 Q Right. And I think you said in regards to Minor2 two
4 weeks is kind of your time frame?

5 A Yes, greater than two weeks. So the injury would have
6 healed by then.

7 Q Okay. All right. And I believe you also said Minor1
8 did not have any STD's?

9 A No. Neither girl had any sexually transmitted
10 infection.

11 Q All right. And as far as Minor2 is concerned you did
12 note a healed injury, correct?

13 A Yes, I did.

14 Q So it's not a fresh injury, it's at least two weeks
15 old, right?

16 A Correct.

17 Q Okay. But other than that you can't say.

18 A No. I can't put a tighter conditions time frame on
19 that.

20 Q Okay. And you said your -- your diagnosis is based on
21 the history you're given, correct? Your diagnosis it's a
22 sexual abuse is based on the history you're given, correct?

23 A So which child are we referring to?

24 Q Well, based on either one of them, but I guess
25 specifically Minor2 on this one.

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1 A So for both children the children -- the girls made
2 disclosers to the medical providers in their medical exams.
3 So, yes, we're depending on a history as well as the
4 findings in the case of Minor 2 but we're taking that
5 history directly from the girls at the time of their
6 evaluation.

7 Q Right. So if Minor 2 had been the one that slid down
8 the banister onto the pool cue, your diagnosis would be
9 different.

10 A Yes.

11 Q Because that's the history you got.

12 A Yes. If that history was provided, and also if it was
13 an acute injury at the time. If, you know, I was coming in
14 and seeing a healed injury then I would be making a
15 different diagnosis because why didn't you seek medical care
16 with a bleeding child.

17 Q Right. All right. So you don't see an injury on
18 Minor 1 no STD's. A healed injury on Minor 2 and no STD's.

19 A Correct.

20 Q Is that a fair assessment?

21 A That is a fair assessment.

22 MR. FRICK: Thank you. That's all of the questions I
23 have.

24 THE COURT: Redirect?

25 MS. LIVELY: No, Your Honor. That's all of the

1 questions I have for this witness.

2 THE COURT: Thank you, ma'am, you may step down.
3 You're free to leave. All right. Let's take a midmorning
4 recess, ladies and gentlemen of the jury, please do not
5 discuss the case. All right?

6 (The jury left the courtroom.)

7 THE COURT: All right. Anything before we take a
8 recess?

9 MS. LIVELY: Just real quick, Your Honor, for purposes
10 of this afternoon. What I did -- and I haven't mentioned
11 this with Mr. Frick and I know he's probably going to ask me
12 this anyway, there's mention of his -- the prior record of
13 the defendant in his interviews. Okay? And there's also
14 mention of an offer for him to take a polygraph. So what I
15 did was is I've gone through all of those interviews and I
16 actually have spots where I know I need to hit mute, I'm
17 assuming he wants me to redact that.

18 MR. FRICK: Yes, sir, we would appreciate that.

19 MS. LIVELY: So I'm just being a little proactive here
20 so I've done that, but I don't have the capability of
21 redacting it like slicing the video.

22 THE COURT: I understand. But have you -- you can just
23 fast forward that spot. How long is each mute?

24 MS. LIVELY: I know. Well, that's what I'm going to
25 say, it's not very long, so it's easier for me to mute it.

1 Because if I start to try to jump forward then I might
2 not --

3 THE COURT: That's fine. They'll think it's a
4 technical issue.

5 MS. LIVELY: Well, there's a few technical issues then.
6 That's why I'm saying, does the Judge want to say there's
7 been some ruling that some portions of the video that -- I
8 mean, I don't want to draw --

9 THE COURT: I don't want to draw their attention to it
10 by doing that, we'll just mute it, you know.

11 MS. LIVELY: That's why I'm bringing it up. It doesn't
12 matter to me, I don't have a problem doing it anyway, but I
13 wanted to bring that to your attention because we'll
14 probably get into the videos I'm thinking after lunch.

15 THE COURT: All right. What do you think, Mr. Frick?

16 MR. FRICK: I think that's what we need to do at this
17 time.

18 THE COURT: I mean, do you think I should tell them
19 there's going to be areas with --

20 MR. FRICK: No.

21 THE COURT: That way they'll pay attention to what the
22 words and the lips are saying.

23 MS. LIVELY: Okay. They'll finally be really looking
24 at the videos, fine, I get that. I just want to be sure
25 that you knew that that's what I was doing.

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1 request a break for even a moment to stand and stretch. The
2 Court, I promise you, I'll accommodate your request in an
3 effort to ensure your ability to fully hear and retain the
4 information contained in these interviews. Now, please look
5 and listen carefully so that you can accurately discuss and
6 deliberate when you get the case so as to avoid the
7 necessity of replaying everything, unless you determine
8 that's what you want to do. Okay? Thank you. Your
9 witness.

10 MS. LIVELY: Thank you, Your Honor.

11 DIRECT EXAMINATION

12 BY MS. LIVELY:

13 Q Investigator Sanders, please tell the jury where you're
14 currently employed.

15 A With the Chester City Police Department.

16 Q And what is your actual title at the Chester City
17 Police Department?

18 A I am the lieutenant over investigations.

19 Q And so are you basically the lead on violent crime
20 investigations at the city?

21 A Yes.

22 Q And how long have you been -- in your career how long
23 have you been an investigator?

24 A A little over ten years.

25 Q And in doing -- in your career as an investigator and

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1 in your job as investigating violent crimes at the City of
2 Chester, do you have the opportunity to investigate
3 allegations of child sexual abuse, rape, murder, those types
4 of things?

5 A Yes.

6 Q All right. And in your capacity as lieutenant and
7 investigator, did you actually get some information from
8 another law enforcement agency in August of 2019 as to a
9 potential victim of domestic violence?

10 A Yes.

11 Q All right. Please tell the jury how this particular
12 case came to you which opened up the investigation on why
13 we're here today.

14 A I was contacted by Rock Hill Police Department in
15 reference to a domestic violence case. They did give me the
16 victim's name and phone number, at which time I did make
17 contact with Sarah Lacy on 8/22 via phone, got her
18 information and got the initial report of the domestic
19 violence itself that day.

20 Q Okay. Why was it sent to Chester instead of Rock Hill
21 Police Department moving forward with an investigation?

22 A They discovered that the incident actually took place
23 on Ella Street within the city limits of Chester.

24 Q All right. And in order for it to be properly
25 investigated, does the jurisdiction -- the law enforcement

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1 jurisdiction who actually is in charge of that particular
2 area, are you the ones who have to do the investigation?

3 A Yes.

4 Q And at the time whenever you spoke to her on
5 August 22nd, did you actually schedule a day and time for
6 her to come in to be interviewed?

7 A Yes. She did come down the following day and met
8 originally with my victim's advocate, Ms. Tobias, at city
9 hall at the police department.

10 Q All right. So on August 23rd, 2019, she met with
11 Keesha Tobias. Was Ms. Tobias the young lady who actually
12 testified first for us at the beginning of this trial?

13 A Yes, she was.

14 Q All right. So in that initial contact, was there
15 anything other than just an allegation of domestic violence
16 that you were aware of that Ms. Tobias had to look in to?

17 A Initially, no. But once she started talking to her she
18 started giving allegations about sexual assault to the
19 children at which time my victim's advocate contacted me.

20 Q And is that standard protocol if some other information
21 is coming out that she would want to have an investigator
22 present?

23 A Yes.

24 Q All right. And we've already got in evidence, I'm
25 going to mention them to you, State's Exhibit 14, 15, 16,

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1 and 17. I'm going to show these to you and ask you if you
2 recognize those four forms?

3 A Yes, ma'am.

4 Q All right. When Ms. Tobias realized there's more here
5 than someone that I'm going to deal with as a victim
6 advocate and she calls you in, is it standard protocol to
7 have that individual sign a waiver of rights?

8 A Yes.

9 Q All right. And at the time based upon you being the
10 investigator who was called into this case, did you believe
11 it was a good idea to read these rights to Ms. Lacy and have
12 her understand what was going to take place?

13 A Yes, it was.

14 Q All right. So each one of those, if you could just
15 remind the jury, because it's been awhile since Monday, if
16 you could just remind them the date that Sarah Lacy actually
17 made contact with the city police department and filled out
18 a Miranda form.

19 A The first one we met her in person was on 8/23/2019.

20 Q Okay. So that was the one that you were just referring
21 to, correct?

22 A Yes.

23 Q When was the next time that she came in and signed a
24 Miranda?

25 A The next one was on 8/26/2019.

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1 Q All right. When was the next time?

2 A 8/29/2019.

3 Q And the last one that you have, Investigator Sanders?

4 A Was on 9/16/2019.

5 Q On 9/16, 2019, do you know whether or not that was the
6 date when Sarah Lacy was actually arrested?

7 A Yes, it was.

8 Q All right. Prior to that time, was she coming in and
9 just being interviewed or talked to by investigators?

10 A Yes.

11 Q As well as Ms. Tobias.

12 A Yes.

13 Q All right. I'm going to retrieve those from you now.
14 During your investigation and as you started to learn
15 additional information, who became a person of significant
16 interest for you regarding the information that Sarah Lacy
17 was telling you?

18 A Brad Corlew.

19 Q Brad Corlew. And did you have any information at that
20 point in time as to where Mr. Corlew may be located?

21 A Not at that point in time, not yet.

22 Q Okay. So what did you do in talking to Sarah Lacy to
23 determine, you know, first of all where her children were
24 and the safety of her children?

25 A The first day that we spoke to Ms. Lacy her children

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1 were with her.

2 Q Okay. So she actually brought them with her to the
3 police department?

4 A Yes, ma'am.

5 Q All right. After you get the Miranda signed by Sarah
6 Lacy and you start to hear some of the allegations, what did
7 you decide to do as an investigator in this particular case
8 regarding the safety of her children?

9 A We went ahead and put the children into emergency
10 protective custody.

11 Q Okay. So when you take the children into emergency
12 protective custody, does she have the ability at that point
13 in time to take the children and leave?

14 A No, she did not.

15 Q All right. And who else do you call as an assisting
16 agency whenever you have children that are placed in an EPC?

17 A We went ahead and contacted the Department of Social
18 Services.

19 Q So on August the 23rd of 2019, how many children did
20 she bring in there with her?

21 A Four.

22 Q So her four children who came in with her were taken
23 into emergency protective custody at that time; is that
24 right?

25 A Yes, ma'am.

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1 Q And to your knowledge up until the time Sarah Lacy was
2 arrested on September 16th of 2019, did they remain in the
3 custody of the Department of Social Services?

4 A Yes, ma'am.

5 Q All right. Now, getting back to whenever Sarah was
6 being interviewed by yourself, who else was in the room
7 whenever you were interviewing Sarah Lacy?

8 A The initial one was myself and the victim's advocate,
9 Keesha Tobias.

10 Q And whenever you talked to her and you started to learn
11 these allegations, what all were the different allegations
12 of the types of abuse that you needed to investigate based
13 upon her statements?

14 A Physical abuse, domestic violence, sexual abuse,
15 threats made to family members, putting kids -- isolating
16 them in their rooms for hours at a time.

17 Q All right. So you receive all of this information.
18 What was the next thing -- and I know you said at the time
19 you didn't know where the person of interest, Mr. Corlew,
20 was. What did you do to try to locate Mr. Corlew at that
21 point?

22 A We was able to finally get in contact with him via
23 phone.

24 Q Via phone. All right. Who gave you that number, do
25 you recall?

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1 A I believe it was Ms. Lacy but I'm not for sure.

2 Q All right. Were you concerned about -- how many
3 children did she tell you he had?

4 A Five.

5 Q Five. All right. Did she mention to you at that time
6 what the ages of those children were?

7 A I don't recall if she told us the ages or not.

8 Q Okay. That's fine. Based upon the information that --
9 well, how old were her kids? Were they young?

10 A They were 11 and under.

11 Q Eleven and under. Okay. So did Ms. Lacy provide you
12 with information as to how long they had been living in that
13 location on Ella Street?

14 A Roughly about a year.

15 Q All right. And once again we're right at about
16 8/23/2019 that you're talking to her, correct?

17 A Yes.

18 Q Now, you said that you were able to make contact with
19 Mr. Corlew by telephone. Tell the jury when you were able
20 to make contact with him when you actually were able to
21 physically sit down and talk with Mr. Corlew?

22 A The initial, or first interview with Mr. Corlew was on
23 August the 29th, 2019, at the Chester County Law Enforcement
24 Center on Dawson Drive.

25 Q All right. And when he -- did he voluntarily agree to

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1 meet you at the law enforcement center on Dawson Drive?

2 A Yes, ma'am, he did.

3 Q Okay. And at the time whenever he showed up there, do
4 you know who he was with or who brought him?

5 A No, ma'am.

6 Q Okay. And whenever he got there, was he also read his
7 rights in regards to sitting down and talking to you that
8 day?

9 A Yes.

10 Q All right. I'm going to show you what's been marked as
11 State's Exhibit Number 24. Investigator Sanders, would you
12 please tell the jury what that document is?

13 A It's a Miranda rights form.

14 Q And in regards to the Miranda rights form, in the top
15 portion of that form, who was the person identified as
16 signing the forms?

17 A Bradley Corlew.

18 Q And in that particular information that's provided, is
19 there a date and time that the interview was actually going
20 to be conducted?

21 A Yes.

22 Q All right. And did he initial and sign that document
23 and waive his rights to speak with you on that day?

24 A Yes, he did.

25 Q All right. Will you please tell the jury --

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1 MS. LIVELY: The State would move State's Exhibit 24
2 into evidence, Your Honor.

3 MR. FRICK: No objection.

4 THE COURT: Without objection, introduced.

5 MS. LIVELY: Thank you.

6 (The Miranda form was received as State's 24.)

7 Q Would you please tell the jury the -- you've already
8 told us it was 8/29/2019. Will you tell the jury what time
9 of day it was whenever he came in?

10 A It was approximately 1:07 p.m.

11 Q 1:07 p.m. All right. At the time whenever he came in,
12 was he carrying anything with him?

13 A Just his cell phone.

14 Q All right. So at that point in time was he under
15 arrest?

16 A No, ma'am.

17 Q All right. Was he free to leave?

18 A Yes, ma'am.

19 Q And at that time, was the only information you had
20 based upon what Sarah Lacy had told you?

21 A Yes, ma'am.

22 Q And as of August 29, 2019, was she under arrest?

23 A No, ma'am.

24 Q Okay. No charges have been placed against her at that
25 point in time as well, correct?

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1 A No, ma'am.

2 Q All right. So going back to August 29th of 2019, when
3 you sat down and talked to Mr. Corlew, did he provide you a
4 statement that you audio and video recorded?

5 A Yes, ma'am.

6 Q And is that audio and video recorded statement, was it
7 actually downloaded and placed on a flash drive in order to
8 provide it as evidence in this case?

9 A Yes, it was.

10 Q Okay. All right. I'll ask you about that again in a
11 minute. All right. Now, let me get back to before you
12 actually met up with Mr. Corlew. When you were talking to
13 Sarah Lacy, what information did you have as to what their
14 relationship was?

15 A They were boyfriend and girlfriend.

16 Q All right. They were boyfriend and girlfriend. So at
17 that time when they were living together, did they have any
18 children that they had together?

19 A None.

20 Q All right. So all of the children that were in the
21 home -- what was the total children in the home?

22 A Nine.

23 Q Nine children. Did you ever have the opportunity
24 whenever she told you about some of the information that
25 gave you concern to be investigated, did you ever have the

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1 opportunity to go into that home at Ella Street?

2 A No, I did not.

3 Q All right. And tell -- explain to the jury why you did
4 not go into that home.

5 A At the time there was no one living there. He no
6 longer lived there and neither did she. She said they had
7 been evicted, I believe.

8 Q Okay. So they were no longer in that home.

9 A That's correct.

10 Q Okay. So based upon the fact that that house had
11 been -- was vacant then, where were you looking to in
12 regards to the evidence and things in this case? Was it the
13 witnesses themselves?

14 A Yes.

15 Q All right. So in talking to Sarah, did you talk to her
16 children on that day when they were there?

17 A About the case, no, we did not.

18 Q And why didn't you talk to the children at that time?

19 A We don't sit down and talk to juvenile children,
20 especially at that age. What we do is we get set up with
21 Margo at PCASA and we set up forensic interviews and let
22 them do it since they're trained in that.

23 Q And obviously those were the interviews that have
24 already been played in court involving Minor 2 and Minor 1
25 is that right?

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1 A Yes, ma'am.

2 Q Okay. So you did not interview Minor 2 let's just be
3 specific with her, even though she was there with her mother
4 on that day.

5 A No, we did not.

6 Q All right. Now, did Sarah tell you in specifics about
7 who was actually sexually assaulted or abused by the
8 defendant whenever she talked to you and gave you a
9 statement?

10 A Initially it was -- she informed us about Minor 1 as
11 well as Minor 2

12 Q And who was the perpetrator of the sexual abuse?

13 A Bradley Corlew.

14 Q Okay. Was she also a perpetrator of the sexual abuse?

15 A Initially she did not say she was. We found out later
16 that she was.

17 Q And clearly -- well, don't let me say that. As a
18 result of what you did learn in regards to her, you know,
19 involvement, she was also arrested, correct?

20 A Yes.

21 Q All right. Now, do you know where the defendant and
22 Sarah had met?

23 A Florida, I don't know exactly where.

24 Q And do you know whether or not she had any contacts or
25 family here in the Chester area whenever she came here with

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1 Mr. Corlew?

2 A No. All of her family was out of state.

3 Q Out of state. All right. And did you ever have any
4 contact with them for any reason?

5 A We initially spoke to her parents. They did come up
6 during those -- during the beginning of the interviews and
7 everything.

8 Q Okay. And do you know whether or not she worked or had
9 a job at the time whenever she came to you?

10 A She stated she did not work.

11 Q Did she indicate that she -- whether she was able to
12 work or she was on some type of disability or anything like
13 that?

14 A I cannot recall.

15 Q That's fine. Okay. Did she have any close friends or
16 anyone that came in with her whenever she came to talk to
17 you?

18 A The first day, no, ma'am.

19 Q All right. Okay. So on August 29th when you were
20 interviewing the defendant, were you able to determine where
21 his children were located?

22 A When we interviewed Corlew?

23 Q I'm so sorry, yes.

24 A Yes. He advised us where he was living and who he was
25 living with as well as the kids.

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1 Q All right. And you may have already said this, it was
2 not the Ella Street address.

3 A No, it was not.

4 Q Okay. So where did he tell you he was living?

5 A It was a road out in the county, I can't recall exactly
6 what it was, but it wasn't inside the city limits of
7 Chester.

8 Q Did he tell you who he was living with?

9 A Yes, ma'am. Heather Judd.

10 Q And did you happen to know who Heather Judd was?

11 A Yes, ma'am. Because she works at the Chester County
12 Detention Center.

13 Q All right. And did he tell you how long he'd been
14 living with her?

15 A I believe at the time it was just about a month or two.

16 Q About a month or two? Okay. And at that point in
17 time, do you know what the status of their relationship was?

18 A The only thing I knew is they were boyfriend and
19 girlfriend.

20 Q He didn't tell you they were married at that point.

21 A I don't believe they were.

22 Q And that was on August 29th of 2019?

23 A Yes.

24 Q Now, you said that it was -- the interview was
25 conducted at the law enforcement center on Dawson Drive.

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1 Did anybody sit with you during that interview?

2 A Yes. I had Chester County Detective Randy St. Clair
3 with me as well.

4 Q All right. And is it standard procedure to have
5 another officer in the room with you whenever you are
6 interviewing someone?

7 A Yes, it is.

8 Q But he's not with your police department, he's with the
9 sheriff's office.

10 A Yes, ma'am.

11 Q Okay. Do you often coordinate and assist one another
12 when needed?

13 A Yes, we do. And at the time we were using -- I was
14 using their building, so I went ahead and asked him if he
15 would assist me with it since we was using their audio
16 equipment as well.

17 Q Okay. So when we watched the video the other
18 individual that's in the interview, that would be
19 Investigator Randy St. Clair.

20 A Yes, ma'am.

21 Q All right. Did anyone else come into the interview
22 later on that the jury may want to know who that was?

23 A Yes. One of my investigators, Nick Harris.

24 Q Were those all of the people then that showed up in
25 regards to that interview on the 29th?

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1 A Yes.

2 Q So once again, you've already stated that you had him
3 sign a Miranda form. And did he seem at the time willing to
4 talk to you?

5 A Yes, ma'am.

6 Q Did you threaten him in any way, say, "If you don't
7 tell us what we need to know we're going to lock you up
8 right now," anything like that?

9 A No, ma'am.

10 Q All right. And so during that interview, I think you
11 may have already said, it was audio and video recorded,
12 correct?

13 A Yes, ma'am.

14 Q Do happen to remember how long the initial interview
15 was? If you don't that's okay.

16 A I believe the initial interview was close to possibly
17 almost two hours maybe.

18 Q And in regards to that first interview when it was
19 actually downloaded and placed into a flash drive, did you
20 alter, change it, modify it in any kind of way?

21 A No, ma'am.

22 Q All right. And I'll ask you if that's actually in
23 State's Exhibit Number 6. You've actually seen the flash
24 drive and both interviews are on this flash drive; is that
25 correct?

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1 A Yes, ma'am.

2 Q I'm going to ask you about that in a minute. So you've
3 only got the perspective of what Sarah Lacy has told you up
4 until the time that Mr. Corlew comes in in his interview on
5 August the 29th, correct?

6 A Yes, ma'am.

7 Q All right. So what during the interview as an
8 investigator did he provide to you that gave you concerns
9 about how much was going to need to be investigated in this
10 particular case?

11 A He advised us of physical abuse as well as sexual abuse
12 on -- from Ms. Lacy.

13 Q Okay. At anytime, did he actually tell you that he had
14 any sexual contact with any of the children?

15 A Not at that time, no, he did not.

16 Q All right. I just want to make sure we got that out
17 there. What did he tell you in regards to his knowledge of
18 Sarah's sexual interest and sexual contact with the
19 children?

20 A He stated that she would talk about touching kids in
21 general. She talked about role playing. She did -- he did
22 advise us at one point that about her touching, I believe,
23 her daughter.

24 Q And can you tell us the name of that daughter?

25 A Minor 2

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1 Q It was Minor 2 Okay. Was there any discussion about
2 sexual acts in front of -- by him and Sarah in front of the
3 children?

4 A Yes. He said that she tried -- she wanted to -- tried
5 to get him to have sex in front of the children on multiple
6 occasions, he stated he refused.

7 Q At what point in the interview was information provided
8 to you that gave you concerns about what may be on the phone
9 he had with him?

10 A He showed us -- he pulled his phone out and showed us
11 text messages and conversations of what she was sending him
12 and then what he was replying, as well as a couple of
13 videos.

14 Q Okay. And what kind of things was he telling you that
15 she was sending him?

16 A Everything about wanting to touch kids and have sex in
17 front of kids and stuff like that.

18 Q Okay. And were you actually trying -- was he trying to
19 show them to you on the phone or --

20 A Yes, he did. He pulled them up and showed them to us.

21 Q Okay. And was there other things that he was talking
22 to you about that was on the phone that gave you enough what
23 you believed probable cause to seek a search warrant for
24 that particular phone?

25 A He said that she would also send videos of at the time

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1 it was defecating on floors or in the toilet, stuff like
2 that. That was enough for us for child abuse as well as the
3 welfare inside the house.

4 Q All right. Was there ever any discussion about any
5 sexual acts she would do and record when the children were
6 present.

7 A I don't believe at the first interview there was, no.

8 Q Okay. Despite -- I mean, from what you're saying in
9 regards to some of the stuff that was being mentioned, did
10 you seek a search warrant for his phone on that day?

11 A Yes, I did. I went ahead and contacted Investigator
12 Nick Harris, advised him what we were told, and I advised
13 him to go ahead and type up a search warrant while we were
14 still interviewing Mr. Corlew.

15 Q And I'm going to show you what's been marked now as
16 State's Exhibit Number 26. I'm going to ask you if you
17 recognize this, and if that was the warrant that you
18 actually served on Mr. Corlew at the time of his first
19 interview?

20 A Yes.

21 Q Okay. And if you could just tell us, was it in
22 reference to the phone that he had in his possession at the
23 time of his interview?

24 A It was in reference to just taking the phone.

25 Q The phone. All right.

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1 MS. LIVELY: Your Honor, the State would move State's
2 Exhibit Number 26 into evidence at this time.

3 MR. FRICK: No objection.

4 THE COURT: Introduced.

5 (The search warrant was received as State's 26.)

6 Q And if you would -- I'm sorry, Investigator Sanders.
7 Just for purposes of the record, will you just tell the jury
8 the description of the type of I-phone and then the model
9 name? You don't have to give me anything else.

10 A It was a silver I-phone, the model name was I-phone XS
11 Max.

12 Q Okay. Thank you. So when that phone was actually
13 seized by you during the interview, where did you take that
14 phone?

15 A Into evidence.

16 Q Into evidence? I'm going to show you what has been
17 marked as State's Exhibit 23. And were you in here when
18 Investigator Stevens actually testified about the phone?

19 A Yes.

20 Q All right. Would you please look at the envelope on
21 that particular item and tell the jury what is contained in
22 that envelope?

23 A A silver I-phone XS Max.

24 Q Is that the one that's referred to in the search
25 warrant?

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1 A Yes.

2 Q Okay. And other than having opened the top, can you
3 look inside? Is that the phone that you retrieved from Mr.
4 Corlew on 8/29 of 2019?

5 A Yes, it is.

6 Q Okay.

7 MS. LIVELY: Your Honor, the State would move State's
8 Exhibit Number, I believe, 23 into evidence at this time.

9 MR. FRICK: No objection.

10 THE COURT: Introduced.

11 (The phone was received as State's 23.)

12 MS. LIVELY: Thank you.

13 Q All right. So after you do this interview with him,
14 was he under arrest at the end of the interview?

15 A No, he was not.

16 Q So he was free to leave. And did he leave?

17 A Once he gave us a -- we asked if he would give us a
18 written statement and he said yes.

19 Q Okay. So one more piece of information that was
20 gathered. Why did you have him -- if you sat there and
21 talked to him for almost two hours, why did you have him
22 write out a statement?

23 A Because it was a voluntary statement that he swore at
24 the end of it that it was true, so we went ahead and asked
25 him just to get both audio and we have a written as well.

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1 Q Okay. And having him actually sit there and write out
2 the statement, is that helpful for you to have just a
3 concise, you know, rendition of some of the stuff he'd told
4 you in the interview?

5 A Yes.

6 Q All right. So he did do that for you on August 29th of
7 2019?

8 A Yes, ma'am, he did.

9 Q All right. And I'm going to show you what's been
10 marked as State's Exhibit Number 7. Hand that to you.
11 Please tell the jury what that is in State's Exhibit Number
12 7.

13 A It is the voluntary written statement by Bradley
14 Corlew.

15 Q All right. And who witnessed that statement?

16 A I did.

17 Q You did. And is that on a standard form used by either
18 the sheriff's office or the city to have documentation by an
19 individual who's been Mirandized and gives a statement?

20 A Yes, ma'am.

21 Q All right. And were you standing over him forcing him
22 to make that statement?

23 A No, ma'am, I was not.

24 Q Okay. Was he actually willing -- whenever you asked
25 him if he would write it down, was he willing to do so?

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1 A Yes, ma'am, he was.

2 Q Okay. Did y'all interrupt him or bother him during the
3 time whenever he was writing the statement?

4 A No.

5 Q All right.

6 MS. LIVELY: Your Honor, at this time the State would
7 move State's Exhibit Number 7 into evidence.

8 MR. FRICK: No objection.

9 THE COURT: Introduced into evidence.

10 MS. LIVELY: Thank you.

11 (The statement was received as State's 7.)

12 Q Investigator Sanders, I'm going to need you, if you
13 would, please publish -- it's only like a page and a half,
14 correct?

15 A Yes. Yeah.

16 Q Okay. Would you please publish that statement on the
17 record to the jury?

18 A Yes. "Sarah would beat my kids. Punched Bradley in
19 the face, hog-tied him. Sarah punched Minor 1 in the face.
20 Sarah snatched out a fist full of hair out of Elaina's
21 (phonetically) head. Sarah would try to get me to have sex
22 in front of the kids. She twisted my nuts because I
23 wouldn't let her suck me in front of the kids. She would
24 shit and pee in the floor. She would never clean the house
25 and always left it dirty. She would touch herself in front

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1 of the kids, walk around naked in front of the kids. Sarah
2 bit a chunk out of Minor 1's leg. Sarah threw her" -- I
3 think it's Shawn -- "down and beat him all over. Sarah
4 punched Minor 2 in the face. Sarah hit Bailey in the face.
5 Sarah hit Brad multiple times. Sarah threw her phone
6 through the TV. Sarah broke her phone out of anger. Sarah
7 would" -- I believe that's scream and cuss -- "everyone out.
8 Sarah would go in the boys' room and beat them all over
9 their head and body. Sarah would get on top of Minor 1 and
10 beat her. Sarah would sit on top of Bradley and twist his
11 arm behind his back. She would beat them a lot. She would
12 talk dirty, then text role playing about sex with the kids
13 and things like that. I wanted to have a baby -- I wanted
14 to have a baby and she would scream and yell at me because I
15 didn't want to. She would yell at me because I didn't want
16 to whip the kids." That was it. That's all of it.

17 Q And he signed that?

18 A Yes. We have -- when I do a written statement -- when
19 I have people give me a written statement I usually have
20 them initial right in front of the first word of the
21 beginning as well as the last word at the end of that page,
22 and then what I do is the same thing on the next page. And
23 if there's any space open, what I do is I put an X through
24 it and I have them initial in each box and then they sign
25 it.

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1 Q And why do you do that?

2 A Just so nobody can say anything was added to it.

3 Q All right. Thank you, Investigator Sanders, I'll take
4 that from you. After the interview, you've already stated
5 that he was free to go on that particular day, who did you
6 interview next to gather some more information about where
7 he was living and what was going on with his children?

8 A We interviewed Heather Judd.

9 Q All right. And do you know whether or not what the
10 date was that you interviewed her?

11 A I'm not -- I can't recall.

12 Q Okay. Was it pretty soon after you interviewed Corlew?

13 A Yes.

14 Q All right. And whenever you interviewed Heather
15 Judd -- and she's already been here and she's already
16 testified, did you have any information -- you don't have to
17 tell me what she said, but did you have any information from
18 her that there had been any abuse she had witnessed?

19 A No.

20 Q Okay. All right. Did she confirm that Mr. Corlew and
21 his five kids were living with her?

22 A Yes.

23 Q All right. So on that day of August the 29th of 2019,
24 I know you're going to be asked about this, why did you not
25 EPC his children at that time regarding, you know, the stuff

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1 that you were hearing?

2 A We didn't have enough evidence to say that we could
3 actually EPC the children at the time. All we had was Ms.
4 Lacy's testimony, what he stated was everything that she
5 did, that he did not do anything. At the time they were no
6 longer living together and they were living out in the
7 county, so we didn't have enough to EPC them at that point.

8 Q Okay. So you did not -- and in order for law
9 enforcement to take someone's children they have to be in
10 imminent substantial danger; is that correct?

11 A Yes.

12 Q And you did not feel like you had that at that time.

13 A We did not.

14 Q Okay. Now, the next step that took place in regards to
15 the children, because you said that he was free to leave,
16 were the children actually scheduled for those interviews
17 you referred to?

18 A They did get scheduled.

19 Q All right. And did you tell Mr. Corlew that his
20 children were going to be interviewed by someone who
21 interviews children?

22 A Yes.

23 Q Okay. And was that during the first interview you had
24 with Mr. Corlew?

25 A Yes.

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1 Q All right. On August 29th of 2019.

2 A Yes.

3 Q And once again his children were not EPC'd at that
4 time, correct?

5 A No, they were not.

6 Q Okay. And were you aware of whether or not DSS was
7 involved or had had any contact with them at that point?
8 Were you aware?

9 A No, I was not aware.

10 Q All right. So at that point in time he was free to
11 leave, and as far as you knew to go back home to where he
12 was living with Heather and his five children.

13 A Yes.

14 Q And do you recall, and if you don't that's fine, about
15 how long it took for the kids to actually go in for their
16 interviews with Margo Dixon at Palmetto CASA?

17 A I do not recall the exact date. I know it was in -- I
18 believe it was in September.

19 Q It was in September. Okay. And when the children were
20 referred, was it his five children as well as Sarah's four
21 children?

22 A Yes.

23 Q And did that referral come from your agency at the city
24 police department?

25 A Yes.

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1 Q Did you go and actually observe any of those forensic
2 interviews?

3 A I did not.

4 Q You did not? Did someone else from your agency go and
5 observe those interviews?

6 A Yes.

7 Q Who was that?

8 A Our victim's advocate, Ms. Tobias.

9 Q Ms. Tobias who testified earlier.

10 A Yes.

11 Q Now, after those interviews -- now, I understand that
12 Sarah's children -- you already said y'all EPC'd her
13 children on August 23rd of 2019; is that right?

14 A Yes, ma'am.

15 Q Okay. So on the interviews that the children -- of the
16 Corlew children around the same time as the Lacy children,
17 were the children EPC'd on that day?

18 A Yes, they were.

19 Q Okay. At that time in order for you to EPC them from
20 what you've stated is that they were -- you were concerned
21 of imminent danger of the children.

22 A Yes.

23 Q Okay. And since you weren't there you don't know who
24 they are with or who brought them or anything like that.

25 A No.

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1 Q Okay. After the children were EPC'd, do you know
2 whether or not Mr. Corlew had any contact with them?

3 A Not that I'm aware of.

4 Q All right. Now, prior to the -- after the forensic
5 interviews of the children, did you have an opportunity to
6 interview the defendant, Mr. Corlew, a second time?

7 A Yes.

8 Q All right. And do you recall when that was?

9 A I believe it was September 16th, 2019.

10 Q Now, between the time whenever you interviewed him on
11 August 29th of 2019, up until September 16th of 2019, what,
12 if any, information did you have about what was going on
13 with Sarah and with Mr. Corlew?

14 A We wasn't aware -- as far as I know I believe we were
15 told that Sarah was staying in a hotel and Mr. Corlew was
16 still with Ms. Judd.

17 Q So the only -- well, let me ask you this: How many
18 times did you have contact with Mr. Corlew and discuss this
19 case?

20 A Only two times, the first interview and the second
21 interview.

22 Q In both of those interviews did you have him sign a
23 Miranda form and waive his rights?

24 A Yes.

25 Q Both of those times did you actually have his interview

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1 audio and video recorded?

2 A Yes.

3 Q Okay. I'm going to show you what has been marked as
4 State's Exhibit 25. Do you recognize this?

5 A Yes, ma'am.

6 Q All right. Please tell the jury what that is and when
7 it was actually signed.

8 A This is a Miranda rights form, it was signed
9 September 16th, 2019, at approximately 5:41 p.m.

10 Q Okay. And is the individual who actually waives his
11 rights in that form the defendant, Bradley Corlew?

12 A Yes, it is.

13 MS. LIVELY: Your Honor, the State would move State's
14 Exhibit 25 into evidence at this time.

15 MR. FRICK: No objection.

16 THE COURT: All right. Introduced.

17 MS. LIVELY: Thank you.

18 (The Miranda form was received as State's 25.)

19 Q Now, on that particular day where was the interview
20 conducted?

21 A It was at the Chester Police Department at 100 West End
22 Street.

23 Q Okay. So this is some place other -- is that the city
24 hall instead of where he was off Dawson Drive the first
25 time?

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1 A Yes, ma'am.

2 Q Do you know whether or not he voluntarily appeared for
3 that interview?

4 A He did.

5 Q He did. And whenever he got there on that particular
6 day, did you tell him whether or not he was going to be
7 under arrest or what was going on with the investigation at
8 that point?

9 A Not at the beginning, no.

10 Q Okay. At that point in time, was the intent that you
11 were going to have Mr. Corlew arrested on that particular
12 day?

13 A Yes.

14 Q All right. At that point had you already sought
15 warrants regarding the information that you had investigated
16 and gathered in this particular case?

17 A We had.

18 Q You had? All right. So when Mr. Corlew comes in there
19 and he signs a waiver, he understands he's waiving his
20 rights and that anything he says can be used against him,
21 correct?

22 A Yes, ma'am.

23 Q All right. And during that interview, were you able to
24 actually speak with him for a particular amount of time
25 before the interview ended?

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1 A Yes, we were.

2 Q Has that interview been altered, tampered with or
3 changed in any way?

4 A No, ma'am.

5 Q Was it downloaded and provided on a flash drive for the
6 solicitor's office as evidence for this particular case?

7 A Yes, ma'am.

8 Q I'm going to show you what's been marked as State's
9 Exhibit Number 6. If you will just take a look at it. Is
10 there a flash drive in that particular item?

11 A Yes, ma'am, there is.

12 Q Okay. And is that a normal procedure for these
13 statements to either be placed on a flash drive or a disc in
14 order to document and save the evidence for court?

15 A Yes, ma'am.

16 Q Once again you haven't changed those statements in any
17 way.

18 A No, ma'am.

19 MS. LIVELY: Your Honor, collectively in State's
20 Exhibit Number 6 we would ask that interview from 8/29/2019,
21 as well as the interview from September 16th of 2019, be
22 entered into evidence at this time.

23 MR. FRICK: No objection other than previously ruled
24 upon.

25 THE COURT: Yes. Objection noted, objection overruled.

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1 MS. LIVELY: Thank you, Your Honor.

2 (The flash drive was received as State's 6.)

3 Q Now, after that interview and the interview ended, what
4 ended up happening with Mr. Corlew on that day?

5 A We placed him under arrest.

6 Q You placed him under arrest. And after he was actually
7 arrested, did you receive any other updates in regards to
8 the children in this case or anything further in your
9 investigation?

10 A Yes. We was advised of an email that DSS had received.

11 Q Okay. All right. And who did it involve? Don't tell
12 me what it said, but who did the email involve?

13 A Minor 1

14 Q Minor 1 Okay. As a result of the email that
15 was received, what did you as a law enforcement officer and
16 DSS do?

17 A They advised us that they went ahead and set up for a
18 second forensic interview in Lancaster.

19 Q In Lancaster at Palmetto CASA?

20 A Yes.

21 Q And whenever that second interview was actually
22 scheduled, did -- and you said they notified you, is that
23 proper procedure as well?

24 A Yes.

25 Q All right. Do you remember what the date of that

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1 particular interview was?

2 A Not offhand.

3 Q Okay. It was after the defendant was arrested.

4 A Yes. It was in September but it was at the end of
5 September, I don't know the exact date.

6 Q That's fine. Did you attend that interview or did Ms.
7 Tobias?

8 A Ms. Tobias.

9 Q As a result of that particular interview, was there
10 anything additional other than collecting that as a part of
11 evidence that you did in regards to charges against Mr.
12 Corlew and Ms. Lacy?

13 A No. We had already collected -- we had already had all
14 of the charges, it just went into evidence.

15 Q Okay. All right. So as additional evidence in the
16 case.

17 A Yes.

18 Q Now, the phone that we've talked about just a little
19 bit in regards to Mr. Corlew, did you take it to
20 Investigator Paula Stevens for an extraction?

21 A I did not, Nick Harris did.

22 Q Nick Harris did. Okay. And were you in communication
23 with Investigator Stevens in regards to the extraction that
24 she did on that phone?

25 A Yes.

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1 Q All right. And did she provide you with the actual
2 flash drive and download of everything from the phone so
3 that you could have it for evidence in this particular case?

4 A Yes.

5 Q All right. And did you have the opportunity to review
6 some of that information and become familiar with what
7 evidence was on that phone?

8 A Yes, I did.

9 Q Okay. Was there anything that you actually saw that
10 gave you any kind of concern in regards to that phone?

11 A Several clips of pornographic material, as well as a
12 chart that I found of state of rape cases, and it was a bar
13 chart from, I believe -- I can't recall the exact years. I
14 believe it was beginning of 2000's until about 2017
15 referencing Chester versus the United States.

16 Q So what about any kind of -- you said that during the
17 interview 8/29 of 2019, the defendant was showing you text
18 messages and other information on the phone. Did you go
19 through text messages as well as web searches on the phone?

20 A We did.

21 Q And what, if anything, as an investigator did you find
22 of value that you saw on the phone?

23 A There were various text messages about role playing as
24 well as sexual -- I guess they call it sexting -- about
25 kids. But other than that I can't recall exactly some of

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1 the websites.

2 Q Okay. And that's fine. Was there any indication from
3 the phone from 8/29 of 2019 when you got the report that he
4 was trying to make contact with Sarah Lacy?

5 A We did see a couple -- I did see a couple of where he
6 was searching for hotels out of Columbia during the time
7 period that she was talking to us.

8 Q And was her name in any of those searches?

9 A I can't recall.

10 Q That's fine. That's fine. Okay. And after the phone
11 extraction and the arrest of Mr. Corlew, have you had any
12 other investigative work done in this particular case other
13 than coming here to testify in court?

14 A No.

15 MS. LIVELY: Okay. Thank you. Answer any questions
16 that the defense may have.

17 THE COURT: Mr. Frick?

18 MR. FRICK: Thank you, Your Honor.

19 CROSS EXAMINATION

20 BY MR. FRICK:

21 Q Investigator Sanders, do you recall when Sarah Lacy
22 went to Rock Hill Police Department?

23 A I don't know exactly what date she went to Rock Hill.
24 I know that we were contacted on August the 22nd.

25 Q 22nd is when --

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1 A Yes, sir. Because I made contact with her via phone to
2 do the initial report.

3 Q That's when you talked to her. So obviously she went
4 before then.

5 A Yes.

6 Q Okay. So somewhere around the 20th to the 22nd maybe?

7 A As far as I know the 22nd is my first date.

8 Q You don't have the Rock Hill report up there, do you?

9 A Let me look and check and see if I've got it with me.

10 Q What does that look like?

11 A That's the Rock Hill report that we got.

12 Q What's the date she went to the Rock Hill PD?

13 A 8/20. August 20th.

14 Q All right. And that was in reference to domestic --

15 A Domestic, yes, sir.

16 Q When she was initially being interviewed it was
17 supposed to be about domestic abuse, correct?

18 A Correct.

19 Q And then she started mentioning things about sex things
20 that was going on with the children, correct?

21 A Correct.

22 Q And y'all -- were y'all videoing it before she started
23 talking about that or do you know?

24 A No. I believe we didn't start videoing it until after
25 I came in the room.

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1 Q Okay. All right. And then at some point y'all
2 obtained a written statement, correct?

3 A Yes.

4 Q All right. And I think it has been marked for ID only
5 at this time Number 8. What is --

6 A That's Ms. Lacy statement.

7 Q It's a lot of pages to that statement, correct?

8 A Yeah, I believe about 16 or 17.

9 Q And you've been in law enforcement a long time, is that
10 a little longer than normal written statement?

11 A That's the longest one I've ever done.

12 Q And when was she given this paperwork?

13 A On the 23rd.

14 Q Okay. When did she turn in her homework?

15 A It was finished on the 29th.

16 Q 29th? Okay. And it was witnessed by Ms. Tobias.

17 A Ms. Tobias.

18 Q Okay. Now, the solicitor asked you about Bradley
19 Corlew's written statement, that's a sworn statement. Is
20 that a sworn statement?

21 A It is.

22 Q Okay.

23 A It's a voluntary sworn statement.

24 Q Got you. And that's why y'all get the written
25 statement like that because it's got the nice little thing

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1 at the bottom that says, "I swear I've read each page and it
2 contains the correct material."

3 A Yes.

4 Q Okay. Do you recall any of the details of that
5 statement?

6 A I know it was sexual allegations pertaining to Mr.
7 Corlew.

8 Q Right. Okay. And she at that time didn't say anything
9 about herself, correct?

10 A Correct.

11 Q Later she did, correct?

12 A Yeah, correct.

13 Q Was that at her interview on the 16th?

14 A That was her last interview, I believe it was the 16th
15 of September, yes.

16 Q She came in before Brad came in, correct?

17 A Correct.

18 Q Over here at city hall.

19 A Yes, sir.

20 Q So it's fair to say her second interview was different
21 than her first interview.

22 A I can't completely say that because I wasn't in the
23 second interview.

24 Q Okay. But based on that information y'all did obtain
25 warrants, correct?

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1 A Yes.

2 Q Okay. Now, the solicitor asked you about advising Mr.
3 Corlew that his children would be going to a forensic
4 interview at some certain date, I'm not worried about that.
5 Is that standard procedure, you tell the parent, "We're
6 scheduling this interview, you need to go?"

7 A We need somebody to get them there at that point in
8 time.

9 Q Okay. Would that have been the same case with the Lacy
10 children?

11 A By the time we set up the interviews for the forensic
12 interviews those children had already been taken into
13 emergency protective custody.

14 Q Right. But somebody has got to tell whoever --

15 A We advised DSS, and DSS was involved with us with the
16 forensics and they brought them there.

17 Q Got you. All right. But somebody has got to tell
18 them, "Hey, we've got to take these kids to the forensic
19 interview," correct?

20 A Yes.

21 Q Okay. And then the same procedure with Minor 1
22 correct?

23 A Yes.

24 Q She was in custody at foster care custody.

25 A The second time.

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1 Q Second time, that's what I'm getting at, right. So
2 somebody would have had to advise them that she's going to
3 an interview.

4 A Well, DSS was the ones that set up the forensic
5 interview, so --

6 Q Right. Okay. All right. And when you went to go talk
7 to Mr. Corlew the first time on the 29th --

8 A Yes.

9 Q -- did you contact him and say, "Hey, we need to talk
10 to you," or --

11 A I don't recall if I was the one that contacted him or
12 not.

13 Q Okay. Somebody from the city police department --

14 A Yes.

15 Q -- says "We've got -- we need to talk to you about it."
16 And he voluntarily came to the sheriff's department --

17 A Yes, sir.

18 Q -- and started pulling out his phone showing you stuff
19 on the phone?

20 A Yes, sir.

21 Q You didn't ask for that, right?

22 A No, sir.

23 Q He handed it to you.

24 A Yes, sir. He pulled the phone up and showed it to us.
25 I believe it stayed in his hand while I looked at it.

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1 Q I believe we may see that on this video later, too,
2 correct?

3 A Yes.

4 Q And he left that day.

5 A Yes.

6 Q All right. And then the case is continuing to be
7 investigated and y'all need to talk to him again on the
8 16th.

9 A Yes.

10 Q Contact him and he comes voluntarily to the police
11 department.

12 A Yes, sir.

13 Q No one picked him up and brought him there.

14 A No, sir.

15 Q Okay. And, of course, did not leave that day, he was
16 arrested that day.

17 A Correct.

18 MR. FRICK: Beg the Court's indulgence one moment.

19 THE COURT: Yes, sir.

20 (Break in proceedings.)

21 MR. FRICK: Thank you. That's all of the questions I
22 have.

23 THE COURT: All right. Any redirect?

24 MS. LIVELY: Just a few, Your Honor.

25 REDIRECT EXAMINATION

1 BY MS. LIVELY:

2 Q Now, Investigator Sanders, Mr. Frick asked you that Mr.
3 Corlew actually seemed very willing to show you videos and
4 text messages on his phone during that interview, didn't he?

5 A Correct.

6 Q Okay. And if you had found -- at that time if he'd
7 offered to show you some videos of his naked children, would
8 he have been arrested at that time?

9 A Yes.

10 MS. LIVELY: Thank you.

11 THE COURT: All right. Thank you, sir, you can step
12 down. Solicitor, any issues?

13 MS. LIVELY: Want me to approach, Your Honor?

14 THE COURT: Yeah.

15 (A bench conference was held.)

16 THE COURT: All right. Ladies and gentlemen, and I got
17 the lawyers up here to talk about the schedule for this
18 afternoon. What I want to do is go ahead and break for
19 lunch now and take a little bit earlier lunch but get you
20 back here earlier as well, get back at 1:30, we'll go ahead
21 and start. The statement, the recorded statements, which
22 have been introduced into evidence, are going to be
23 published for you this afternoon. Okay? That's why I read
24 this instruction to you again about watching and listening
25 to the statements. Okay? Now, so what we'll do is we'll

1 THE COURT: Yeah. Hang on one second, I'm reading
2 something.

3 (Break in proceedings.)

4 THE COURT: You both argued Chappell versus State of
5 South Carolina, apparently the most recent case involving
6 this issue. I will quote our supreme -- I'll quote the
7 Court of Appeals here on page 77 which stated "Since Brown
8 and Anderson our Supreme Court has considered whether the
9 testimony of an independent expert was improper bolstering,
10 and held that an independent expert does not improperly
11 bolster the victim's credibility by testifying to only
12 general behavioral characteristics of child abuse victims."
13 So, you know, Madam Solicitor, I mean, obviously you know
14 what you're doing and you need to just make sure you keep
15 the questions confined to general behavioral characteristics
16 of child sexual abuse victims so there won't be any issue
17 and we'll see where it goes. All right. Mr. Frick, you
18 were going to say something?

19 MR. FRICK: Yes, sir. I wanted to address the pictures
20 that the solicitor intends to publish this morning to the
21 jury.

22 THE COURT: Yes.

23 MR. FRICK: A couple of issues on that. One, I want to
24 clarify our objection yesterday. Our objection to the phone
25 dump as we did object to yesterday was, one, we weren't

1 entirely sure what was going to be presented. But we do
2 object to the pictures that she does intend to introduce
3 under 402 as irrelevant, and 403, more prejudicial than
4 probative in this matter. It's a picture of a penis.
5 There's allegations that he looked at pornography, and I
6 believe she's going to talk about a child that is in one of
7 these pictures where he is displaying his penis. To my
8 knowledge that child is not one of the children that is a
9 victim of the cases that we are trying so that is my
10 objection.

11 THE COURT: All right. Have you got -- can I see them,
12 the photos that you're wanting to offer?

13 MS. LIVELY: Yes, sir. I'm actually printing out a
14 couple more. Here is what I have done, I'll give you the
15 ones I have because, you know, we couldn't pull it up
16 yesterday. The issue is --

17 THE COURT: What I want you to do is mark them just
18 like we do crime scene photographs and I'll go through as
19 the gatekeeper and decide what can come in and what can't
20 come in based upon a 403 analysis. Okay?

21 MS. LIVELY: Yes, sir.

22 THE COURT: So we'll mark them as State's ID. Once you
23 get them all printed out just go ahead and mark them for ID
24 purposes and then I can either allow some of them in, allow
25 none of them in or allow all of them in.

1 MS. LIVELY: Yes, sir. And I was able to get it to
2 play yesterday and I did show the ones to Ms. Boulware that
3 I intended to use if we needed to. And also, Your Honor,
4 the argument that the State would make in regard is that
5 that in his own statements he made comments that he would
6 never do anything in front of any children, he wouldn't do
7 this. It was found on his phone, it was still saved on his
8 phone, and they can -- it goes to the credibility of what
9 the evidence is --

10 THE COURT: And plus your expert also testified that
11 these were photographs that he made --

12 MS. LIVELY: Correct.

13 THE COURT: -- as opposed to photographs uploaded from
14 the internet. I do recall that testimony. Anything else
15 from the defense for the record?

16 MR. FRICK: Just about the phone itself. Obviously the
17 entire phone has been introduced, there's a lot of stuff on
18 that phone. I think it's our intent that you all want --
19 the only things that are available to the jury are the
20 pictures and stuff that you talked about, correct?

21 MS. LIVELY: What I asked the expert on the stand would
22 be the only thing that I plan on putting on the record in
23 front of the jury unless the defendant does take the stand,
24 and if he does take the stand then I will go through
25 painstakingly every pornographic picture on his phone and

1 allow him to explain the bondage and other teen looking
2 pornography that is on his phone, Your Honor.

3 THE COURT: Okay.

4 MR. FRICK: I just want to clarify, because it is in
5 evidence and if the jury says, "Hey, can we look at the
6 phone dump?"

7 MS. LIVELY: No.

8 MR. FRICK: I don't think it's appropriate for them to
9 be able to sit back there and look at a hard drive --

10 THE COURT: We'll deal with that at the appropriate
11 time.

12 MS. LIVELY: Thank you, Your Honor. And I will get
13 these gathered and stapled and marked for you when we've
14 gotten everything. And I don't plan on doing that until
15 after our blind expert as well as playing that video, the
16 last video.

17 THE COURT: Right. And that's the last two things
18 we're going to do other than --

19 MS. LIVELY: Yes, sir.

20 THE COURT: Okay.

21 (Break in proceedings.)

22 THE COURT: All right. Anything else for the record,
23 Mr. Frick, while she has gone to get those?

24 MR. FRICK: I don't know if you want to address my
25 client.

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1 THE COURT: I can't until the State rests.

2 (Break in proceedings.)

3 (The jury returned to the courtroom.)

4 THE COURT: All right. Good morning, ladies and
5 gentlemen, I hope you had a restful evening. We will jump
6 right into this this morning. The State can call its
7 witness.

8 MS. LIVELY: Yes, sir, Your Honor. The State would
9 call Shauna Galloway-Williams to the stand.

10 The witness, SHAUNA GALLOWAY-WILLIAMS, was first duly
11 Sworn and testified as follows:

12 THE COURT: Ladies and gentlemen, what I was going to
13 tell you before the witness starts testifying so you can
14 plan accordingly at the next break or whatever, is I'm
15 having lunch provided for you today so we can move forward
16 and try to finish this case today. All right? And so I'm
17 trying to gage the timing of when I think it's going to be
18 but I wanted you to be aware of that, so if you need to call
19 somebody and make whatever plans you need to make for lunch
20 you won't be going to lunch, you'll be here and we'll be
21 providing you a meal. Okay? So thank you. All right.
22 Madam Solicitor, your witness.

23 MS. LIVELY: Yes, sir. Thank you, Your Honor.

24 DIRECT EXAMINATION

25

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1 BY MS. LIVELY:

2 Q Good morning, Ms. Galloway-Williams, how are you?

3 A Fine, thank you.

4 Q Are you -- do you actually work in the Chester County
5 area?

6 A I do not.

7 Q You do not. Where are you from?

8 A I actually work in Greenville at the Julie Valentine
9 Center, I'm the CEO there.

10 Q And please tell this jury what the Julie Valentine
11 Center is.

12 A We are the child abuse and sexual assault recovery
13 center that serves Greenville and Pickens County. That
14 means that we provide services to anyone who may have been
15 impacted by child abuse and sexual assault -- child abuse
16 and/or sexual assault. We provide 24 hour crisis
17 intervention services, prevention and education services, as
18 well as counseling services, and children's advocacy
19 services, which include interviews and exams.

20 Q And how long have you been in that position?

21 A I have been the CEO since 2009. Prior to that I served
22 as the clinical director, and prior to that I was employed
23 by the Department of Mental Health and worked as a
24 consultant providing interviews to the center.

25 Q And are you licensed in some field here in the State of

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1 South Carolina?

2 A I am. I've been licensed as a licensed professional
3 counselor in South Carolina since 2004.

4 Q What is the -- what is your educational background?

5 A I have a Bachelors Degree in Psychology from Winthrop
6 University, and a Master's Degree in Counseling from Clemson
7 University.

8 Q All right.

9 MS. LIVELY: Your Honor, at this time --

10 Q Well, let me just ask you this, too. Have you ever
11 been qualified as an expert witness in a court of law?

12 A I have.

13 Q All right. And about how many times?

14 A Over 50 times.

15 Q All right.

16 MS. LIVELY: Your Honor, at this time we would move to
17 have her qualified as an expert in the field of child sexual
18 abuse dynamics.

19 THE COURT: Any voir dire on her qualifications?

20 MS. BOULWARE: Judge, just objection as previously
21 ruled upon.

22 THE COURT: Okay. Objection noted, objection
23 overruled.

24 MS. LIVELY: Thank you.

25 Q Now --

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1 THE COURT: Hang on. She's qualified as an expert in
2 the field of child abuse dynamics.

3 MS. LIVELY: Child sexual abuse dynamics.

4 THE COURT: Child sexual abuse dynamics. Ladies and
5 gentlemen, rather, an expert can testify in the form of an
6 opinion unlike regular lay witnesses who can't offer an
7 opinion. It doesn't mean you have to accept the opinion,
8 it's something simply for you to consider when you consider
9 all of the evidence as a whole. Okay? All right.

10 MS. LIVELY: Thank you, Your Honor.

11 Q Now, do you mind if I call you Shauna?

12 A That's fine.

13 Q Is that fine? Thank you. I've known you for years so
14 I apologize for that, but -- and Ms. Shauna, do you know
15 anything at all about the particular case that we have been
16 trying here in Chester County this week?

17 A No.

18 Q And when you were called as a potential expert witness
19 to come to court here this week, were you provided any
20 documents, forensic interviews, pictures or anything at all
21 to review prior to your testimony here?

22 A No, I have not.

23 Q All right. So in South Carolina, what is that referred
24 to in our court of law in regards to what type of an expert
25 you are going to be here for the jury here today?

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1 A We refer to that as a blind expert.

2 Q Okay. And the information that you're going to be
3 providing to these jurors here today, is that based upon
4 your training in the field of child sexual abuse dynamics
5 and trauma and how children respond to abuse?

6 A Yes. My testimony is based on my education,
7 experience, research training, and continual training in the
8 field.

9 THE COURT: Ma'am, can you move that microphone to you,
10 please?

11 THE WITNESS: This one? Okay.

12 MS. LIVELY: Thank you.

13 Q So have you ever met the victims in this case?

14 A No, I have not.

15 Q Have you had any chance to counsel them or to read any
16 of their mental health records or medical records or
17 anything?

18 A No.

19 Q So when you said you literally have seen nothing in
20 this case, you have no idea whatsoever who the victims are
21 at all.

22 A That's correct.

23 Q Now, Let's talk about some -- just mention what some
24 dynamics of child sexual abuse that the jury may not be
25 familiar with that you've been trained in.

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1 A Okay. Well, one of the most common is in the area of
2 disclosure. Disclosure in child abuse dynamics refers to
3 when a child makes a statement or an outcry, or demonstrates
4 behaviors that may lead someone to be concerned that a child
5 may have been abused or neglected. And related to that is
6 the issue of the delayed discloser, which is very common
7 among children and adults who are survivors of child sexual
8 abuse. The vast majority of children who are abused don't
9 tell right away, and that disclosure could be days, weeks,
10 months, years, and many adults living to their adult life
11 without ever having told anyone about the abuse they might
12 have experienced as a child.

13 Q So in your experience then is it common for children as
14 well as adults to delay this disclosure of abuse?

15 A Yes, it's very common.

16 Q Please tell the jury, what are some things that may
17 cause or have an affect on the actual disclosure by a child
18 of sexual abuse?

19 A Yeah. One of the main reasons that children delay
20 disclosing is fear. Children are afraid of what's going to
21 happen to themselves. They're afraid of what's going to
22 happen to the person that may have done this to them.
23 They're afraid of what may happen to their family or even
24 their pets or other members of their immediate family or
25 their community. Children are often abused by someone that

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1 they know, they love and they trust. This person is often
2 someone that's known, loved and trusted by their family and
3 may be known, loved and trusted by the community. That
4 relationship dynamic in and of itself makes it difficult for
5 children to tell because they may have a complex
6 relationship with this person. A child may love the person
7 that's doing this to them but just dislike the behavior
8 that's happening. In the same way that many of us have
9 family members or friends that may have harmed us in some
10 way and yet we continue to have that relationship with them,
11 children who are being abused might also be experiencing
12 that as well.

13 Q And you mentioned whether it's a family member or
14 someone close to them or something like that, what about if
15 it's actually inter or intra-familial, if the person who is
16 actually committing the allegations of sexual abuse is a
17 family member or an authority figure in the family, how may
18 that affect a child's ability or willingness to disclose?

19 A Again, that's very difficult for children, because
20 children just naturally believe that adults have their best
21 interest in mind. Children are dependent on adults to take
22 care of them, they trust that adults are doing what's in
23 their best interest. So it can be very confusing for a
24 child when someone who they trust, who they love and who is
25 charged with caring for them might also be doing something

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1 that is harmful to them. It's difficult for a child to sort
2 that out.

3 Q Okay. What if a child, you know, the victim of abuse,
4 is being somewhat isolated from others in the community, how
5 may that affect the child's ability or willingness to
6 disclose any abuse?

7 A All right. So sometimes the delay in disclosure is
8 because there was no opportunity to tell someone. No one
9 asked. There was no one -- there was no trusted safe adult
10 outside of the child's circumstances for the child to tell,
11 and sometimes that opportunity is in a sense the child's
12 development. A child may not have the words or cognitive
13 skills or language to describe what's happening to them.
14 Sometimes when children are abused they don't have a sexual
15 frame of reference, they don't have the language, they don't
16 understand, and add that to the fact that someone that's
17 doing this to them may be someone who is also in a loving,
18 caring relationship with them, it becomes very difficult for
19 them to have the opportunity and or the knowledge to share
20 that information with someone.

21 Q Okay. And in a hypothetical setting, if a child who is
22 being sexual abused has a caregiver that they're going to go
23 and tell, if that caregiver hasn't protected them in the
24 past, how may that affect their willingness or ability to
25 disclose?

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1 A Yeah. So children, you know, they internalize how the
2 response may be when they tell someone something. And if
3 someone hasn't been protective of them, or if they witnessed
4 aggression or violence from these caring adults they may
5 internalize that that may be how they respond to them in any
6 situation, so they may not necessarily trust that this is a
7 safe person to tell.

8 Q How does the exposure to domestic violence affect a
9 child's, you know, willingness or ability to disclose, kind
10 of a segue to what you just mentioned.

11 A So another one of the reasons that children delay
12 disclosure is because of fear and threats. And sometimes
13 those threats are direct, where a child is told, "If you
14 tell this might happen." And sometimes those threats are
15 indirect in the sense -- or in the case of domestic
16 violence, that might be an indirect threat where a child is
17 witnessing this person who may be harming them also being
18 aggressive or hurtful to other people. And they may
19 internalize that if I tell or if I do something then that
20 may happen to me or -- and/or this may mean that something
21 would happen to the other person that may be harmed.

22 Q Let me talk to you a little bit more about the familial
23 link and an alleged perpetrator's access to a child in the
24 home. When it's a familial situation, and in your
25 experience if the person who is committing these acts

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1 actually present it as a normal behavior, how may that
2 affect a child's understanding of what's going on and
3 willingness to disclose?

4 A So abuse of any kind is confusing for a child,
5 particularly when it's committed by someone that they know,
6 they love and they trust. This may be done in the context
7 of caregiving, which may make that very confusing. So
8 behaviors that may occur at bedtime or during bath time, the
9 children that need more hands-on care or more direct
10 assistance, it becomes even more confusing. And especially
11 the fact that, again, children believe that their caregivers
12 have their best interest in mind and they're dependent on
13 them for their care, so that can be very confusing. At
14 times these behaviors are committed in a way to normalize
15 that for children, or essentially what we might consider
16 grooming where you're introducing a child to sexual
17 behavior, sexual knowledge over a period of time and that
18 may start through touching them during caregiving
19 progressing to other types of touching. It may involve
20 sexual jokes, sexual pictures, introducing children to
21 pornographic images, normalizing a behavior that essentially
22 wouldn't be normal for a child at that developmental age.

23 Q At the time whenever -- let's jump to now in your
24 experience a child makes a disclosure of sexual abuse. Is
25 the act of actually disclosing that sexual abuse something

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1 that can be as traumatizing as the abuse itself?

2 A Yes.

3 Q Okay. Please explain to them in your expert opinion
4 why that is.

5 A Yes. So at times when children disclose -- or not at
6 times, when a child discloses abuse that really changes
7 everything for that child and family. All the sudden their
8 family is requested -- they have to go to appointments, they
9 have to talk about what's happened to them. For some
10 children that means that they have to move or other family
11 members have to move. It may involve going to a different
12 school. It may involve sharing -- or it does involve
13 sharing intimate details about something that they may never
14 have intended or wanted to share with anyone. And so for
15 many children -- most children don't know what's going to
16 happen after they tell. Most children don't know what the
17 investigative process is like, they don't know about, you
18 know, talking to investigators and if their family is
19 involved with the Department of Social Services or if they
20 have to come to a center like the Julie Valentine Center
21 what's going to happen, and those experiences can be very
22 difficult. It also can be challenging for a child when the
23 person who may have done this to them is someone that's
24 close to them; their family, their community, because often
25 that divides families and communities. People might choose

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1 sides, they might start acting different around one another,
2 they may isolate or act different towards one another.

3 Q Okay. If the perpetrator of the abuse, the sexual
4 abuse on the child, still has access to the child up until
5 the time a child may be questioned about potential abuse,
6 how could that affect their disclosure?

7 A Well, multiple ways. One, it could create fear in the
8 child, and, you know, that child may be even more fearful to
9 share information about what's happened for fear of those
10 threats that we talked about previously, those indirect or
11 direct threats. But it may also, you know -- at times
12 children may disclose more information because they may see
13 this as an opportunity to do something about what's happened
14 to them. It could really go either way.

15 Q It could go either way. Fair enough. Please describe
16 to the jury, you know, after that initial disclosure what is
17 meant by a piecemeal disclosure by a child.

18 A So when we talk about disclosure we talk about that as
19 a process rather than a one time event. So what that means
20 is we don't expect that when a child describes the abuse
21 that they may have experienced that they're going to
22 describe every single detail about that the first time that
23 they tell someone. That's where the piecemeal part comes
24 in. What that means is that they may share certain details
25 with certain individuals depending on who that individual

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1 is, the type of questions that they're asked, the other
2 extenuating circumstances such as, you know, are they still
3 in contact with the person that may have done this to them,
4 and so they may not share every single detail of every
5 event. And for children who may have experienced more than
6 one incident of abuse, even more so we would expect that
7 they may not share all of those details about every single
8 incident the first time that they talk about it.

9 Q Okay. And based upon your experience in child sexual
10 abuse dynamics, is there a difference between a child's
11 ability to recall -- and I'm not asking whether any veracity
12 or credibility, what I'm asking is ability to just
13 understand if it is a one time acute event in comparison to
14 chronic multiple events, is it difficult for them to talk
15 about each event if it's chronic?

16 A Yes. It can be very difficult to talk about each of
17 those events and to provide specific details about each of
18 those events for a couple of reasons.

19 Q What are those reasons?

20 A Well, for one reason even if it's an acute event it may
21 be difficult. If it's a one time event it may be difficult
22 for a child to describe every single detail about that
23 event. Because child sexual abuse is a traumatic event. A
24 traumatic event just like a natural disaster, a car
25 accident, or something where you're out of control, you

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1 don't have control in this situation, you may even fear for
2 your life, right? So when we are experiencing trauma or
3 traumatic events, our ability to put things in sequence and
4 put things in order changes because we're in that situation.
5 Our ability to remember all of the external details, what
6 the room looked like, where we were, all of those things may
7 become very difficult because we are scared, we are
8 experiencing a lot of emotions at the time because it's a
9 traumatic event. So that's one of the reasons that it may
10 be impacted. The other is over a period of time multiple
11 incidents may be difficult to remember each individual
12 incident and each specific thing about that incident. In
13 the same way that if any of us were asked to describe every
14 single consensual sexual experience that we'd had in the
15 past ten years, and if we were asked to describe who that
16 was with, who initiated that, what room we were in, what
17 color the walls were, how our bodies were positioned, how
18 our clothes were, who took whose clothes off, what was said,
19 what was felt, what was smelled, we may have a difficult
20 time -- most of us would have a difficult time describing
21 all of those details in that way for each of those
22 incidents. And it's very similar when we're asking children
23 to describe nonconsensual traumatic instances of abuse as
24 well.

25 Q And in regards to what you just said when it's chronic

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1 abuse, meaning multiple events, how do children -- let's
2 just give a basic age frame, let's say between the ages of
3 eight to 12, how easy or how difficult is a child that age
4 for them to actually answer some of these when, where, how
5 often, what happened each time type questions?

6 A Yes. They just -- developmentally a child that age
7 doesn't really grasp and understand the concept of time.
8 Time is an abstract concept, and really until the age of
9 about 14 it's still really difficult for a child to put a
10 date, a day, a time. They might be able to describe what
11 grade they were in in school, what house they were living
12 in, who they were living with, and then we may be able to
13 figure out from that context what the time is. But to ask a
14 child and expect that they can give us a day, date and year
15 would be difficult, in the same way that it might be
16 difficult for us if we're describing all of those
17 experiences that I just referenced as well.

18 Q Exactly. So even for an adult that could be a very
19 difficult --

20 A Yes. But just developmentally time is difficult for
21 children to understand.

22 Q All right?

23 MS. LIVELY: Thank you so much, Shauna
24 Galloway-Williams, please answer any questions that the
25 defense may have.

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1 THE COURT: All right. Ms. Boulware, your witness.

2 MS. BOULWARE: Thank you, Judge.

3 CROSS EXAMINATION

4 BY MS. BOULWARE:

5 Q Good morning, Ms. Galloway-Williams.

6 A Good morning.

7 Q I won't try to say the whole name since I don't know
8 you personally.

9 A Thank you.

10 Q So in this particular case you never met the children.

11 A I have not.

12 Q Never reviewed any evidence, watch any interviews,
13 interviewed the children yourself.

14 A No, I have not.

15 Q Okay. And you were saying that often times there might
16 be delayed disclosure because of fear I think is what you
17 testified to?

18 A Yes. That's one of the number one reasons children
19 delay disclosure.

20 Q Okay. Is it fair to say that the opposite could be
21 true as well, that a child could also disclose sexual abuse
22 against a certain person that didn't happen out of fear nor
23 in order to please others?

24 A I'm not clear --

25 Q Is it fair the opposite of that could be true?

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1 A That a child would not delay disclosure or would --

2 Q Could possibly disclose sexual abuse against a person
3 who actually didn't abuse them out of fear, some type of
4 fear, I'm not sure what or -- to please others because it
5 would make someone else happy if they did that.

6 A I'm not sure I can answer the question the way that
7 you're asking me that question.

8 Q Well, I'll simplify it for you. If it can be one way
9 can it be the other as well?

10 A So what I'm testifying to is the fact that one of the
11 reasons that children delay disclosure, or don't tell, is
12 because of fear. Because, you know, most people would
13 assume that if a child is being harmed and if someone is
14 hurting them that they would tell someone right away. But
15 when we're talking about sexual abuse that's just not the
16 case because of all of these dynamics that I've just talked
17 about; the relationship to the individual, the fear of what
18 may happen, the threats.

19 Q Okay. But is it fair to say that some children
20 disclose sexual abuse that didn't actually happen for
21 various reasons?

22 A Are you -- I don't -- I can't answer your question the
23 way you're asking it. Because I think -- what you're asking
24 me is if children provide false allegations.

25 Q Does that happen sometimes?

1 MS. LIVELY: Your Honor, may we approach?

2 THE COURT: Yes.

3 (A bench conference was held.)

4 THE COURT: Objection overruled.

5 Q Ms. Galloway-Williams, you can't really tell the
6 children -- I'm mean, excuse me, tell the jury in this
7 particular case whether any of the children were sexually
8 abused, or particularly who may have sexually abused them.

9 A That's correct. I can't do that in this particular
10 case, and really in any particular case.

11 Q I understand. Okay.

12 MS. BOULWARE: Thank you. No further questions, Judge.

13 THE COURT: All right. Any redirect?

14 MS. LIVELY: No, Your Honor.

15 THE COURT: All right. Thank you, ma'am, you can step
16 down, you're free to leave. State can call its next
17 witness.

18 MS. LIVELY: Your Honor, at this time the State is
19 going to publish the final interview of the defendant that
20 was recorded on September 16th of 2019.

21 THE COURT: All right. Thank you. Ladies and
22 gentlemen, we're about to watch another video statement.
23 I'll ask you to remember what I instructed you several times
24 before on the importance of watching and listening to all of
25 the evidence, not just the video statements, but everything

1 of course, but make sure you watch the video. Let's do this
2 while Mr. Keith is getting everything set up, I've got to
3 run to the restroom, so let's take a little bit -- let's
4 take a quick recess. Because I think -- Madam Solicitor,
5 how long is this one?

6 MS. LIVELY: That was what I was going to talk to you
7 about, it's less than an hour but it may be even less than
8 that.

9 THE COURT: Forty-five minutes or so, let's go ahead
10 and take a break now. Don't talk about the case. Okay?
11 Thank you.

12 (The jury left the courtroom.)

13 THE COURT: I have looked at the photos and I'm not
14 going to let any of them in under a Rule 403 analysis. Does
15 the State wish to make any other argument?

16 MS. LIVELY: No, Your Honor, that's fine. I think that
17 the testimony of the digital forensic expert was enough, and
18 if the defendant decides to take the stand obviously that
19 may be something we can revisit.

20 THE COURT: Sure. Yeah. I think potentially -- at
21 this point in time I'm not going to let them in. I think if
22 the defendant does take the stand obviously those will
23 probably be allowed to come in because you'll be able to lay
24 more of a foundation with him, asking more specific about
25 each one of those individual photos. But as they are I just

1 don't, you know, looking at the long play here.

2 MS. LIVELY: No, sir, I understand.

3 THE COURT: All right. Thank you. That's the ruling
4 of the Court.

5 MS. LIVELY: And, Your Honor, just so -- for the record
6 what we've done is -- and I've talked to defense counsel --
7 is the very first part of the interview he admits to law
8 enforcement about his prior record, he hasn't been
9 Mirandized yet. So what we did is we started the interview
10 in at 17 minutes and about 31 and a half minutes (sic) and
11 it had played through, so that means it's going to be less
12 than an hour. And we've also at some point about 18 minutes
13 in I will have to hit mute, but it's only for a few seconds.
14 And then at the very end the defense has requested that I
15 end the interview prior to him asking for a lawyer and
16 showing him actually being arrested, which the State has
17 agreed to do. So those are the dynamics -- well, that's
18 what we're going to do.

19 THE COURT: And I'll tell them again -- I'll tell the
20 jury again that there will be excerpts of the video where
21 the lawyers agree are immaterial and we'll just either, you
22 know, mute those or just fast forward through those.

23 MS. LIVELY: Yes, sir, that's fine.

24 THE COURT: Anything else?

25 MR. FRICK: Sounds good.

1 MS. LIVELY: We're ready.

2 THE COURT: All right. Okay. Sounds good, let's do
3 it. Let's bring the jury in.

4 (The jury return to the courtroom.)

5 THE COURT: All right. All members of the jury are
6 present. Madam Solicitor, you may publish the, I guess,
7 second interview with the defendant, which has previously
8 been entered into evidence. Ladies and gentlemen, again,
9 remember what I told you about paying attention just like
10 you've been doing throughout the whole trial. Thank you
11 very much. In addition, there are several spots in this
12 video where the lawyers have looked over it and agreed that
13 there's stuff that's immaterial, so there will be spots
14 where it's either muted or fast forwarded so you'll see
15 what's relevant for you to see. Okay? Thank you. You may
16 publish.

17 (At this time the interview of the defendant was
18 Played.)

19 MS. LIVELY: That's the video, Your Honor. That's all.

20 THE COURT: All right. Thank you. All right. The
21 State can call its next witness.

22 MS. LIVELY: Your Honor, at this time the State rests
23 its case.

24 THE COURT: The State rests. All right. Ladies and
25 gentlemen, there's some matters of law that I need to take

1 up with the lawyers so I'm going to ask that you head back
2 to your jury room, again, don't talk about the case, we'll
3 get you out here just as soon as possible. Thank you.

4 (The jury left the courtroom.)

5 THE COURT: All right. Mr. Frick?

6 MR. FRICK: Thank you, Your Honor. At this time the
7 defense would request that Your Honor direct a verdict on
8 all charges. Taking the evidence in the light most
9 favorable to the State I believe this is an issue that can
10 be decided as a matter of law and there's not enough
11 evidence to go to the jury, so I would ask you to direct a
12 verdict on all three charges; criminal sexual conduct with a
13 minor first and second, and incest.

14 THE COURT: All right. I respectfully deny your
15 motion. I do find that there is enough evidence for the
16 case to continue to go forward. All right. Does the State
17 wish to be heard on that?

18 MS. LIVELY: No, sir.

19 THE COURT: Okay. All right. Anything else, Mr.
20 Frick?

21 MR. FRICK: Your Honor, at this time just renew all
22 objections and motions, pretrial motions.

23 THE COURT: Noted for the record, my rulings will
24 remain the same. All right. And now let me talk to you,
25 sir, if you don't mind standing, Mr. Corlew. I'm going to

CLOSING ARGUMENTS

1 phase of the trial. You will recall on day one when I told
2 you about how a trial proceeds, the next thing that's going
3 to happen is the attorneys will be able to speak directly to
4 you by what's called closing arguments. You'll recall in my
5 initial instructions to you I instructed you that closing
6 arguments are arguments, they're not evidence, but it's
7 simply the lawyers' chance to argue to you why you should
8 find a certain way. Okay? So I ask that you give your
9 undivided attention to the lawyers as they argue their case
10 to you. Following closing arguments, that's when I'm going
11 to speak directly to you as I'm doing now and instruct you
12 on the law as it pertains to the issues which have arisen in
13 this case. And after that, ladies and gentlemen, you can
14 enjoy some lunch, which I'm calling in for you, as well as
15 start talking about the case amongst yourselves and
16 deliberating your verdict. Okay? So please listen
17 carefully to the lawyers. Madam Solicitor?

18 MS. LIVELY: Thank you, Your Honor.

19 (Break in proceedings.)

20 MS. LIVELY: May it please the Court, Your Honor?

21 THE COURT: Yes, ma'am.

22 MS. LIVELY: Ladies and gentlemen, when I first started
23 talking to you earlier this week it was one of those things
24 that as a prosecutor, as an attorney in general, you always
25 kind of wonder how far should I go in talking about what

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1 you're going to hear and what you're going to see in the
2 case. Because if I cannot present you with that evidence
3 then I don't have any credibility with you, and at the end
4 of the case I would have to come up to you and say, "Well,
5 you know, I told you this was going to be said, I told you
6 this was going to be said, sorry, that evidence didn't come
7 out." I don't have that here. And I'm going to tell you
8 right now that -- and I don't know any other way to say it,
9 but I am sorry you had to hear what you heard this week.
10 Not because you don't have a job to do as jurors, as
11 citizens of this county, as human beings, but every bit of
12 what you heard was hard to hear. But the thing I want to
13 tell you and remind all of you, you never had to live it
14 like those children lived it everyday. And don't even be
15 somewhat fooled by the minimization and the attempts to put
16 it all off on Sarah Lacy by the Defendant Corlew. He was an
17 active, willing, knowing sexual abuser of not only his own
18 daughter, but of a ten year old disabled child who trusted
19 her mother who didn't protect her. I'm not making excuses
20 for her, and I would never makes excuses for what she did to
21 her child, but there's no excuse for what he did to his
22 child or her child. So that's why y'all are sitting in
23 those chairs today, that's why you have been sitting
24 intently to every single thing so that you can go in that
25 jury room, make your decision and end that house of horrors

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1 that these kids had to live through. His sinister lies,
2 that sinister secret I told you about probably didn't even
3 hit the tip of the iceberg as to the true level of sinister
4 that those children lived through. What I'm going to do,
5 because I know y'all have listened, I'm not going to sit
6 here at this point in time, I know with everything you've
7 heard, everything you've seen with the witnesses in that
8 witness stand, I watched each and every one of you and I
9 know you have heard it and you have taken it in, you're
10 going to have evidence with you. So all I'm going to do is
11 I'm just going to try to wrap it all up because if there's
12 anything that you may feel like you may not necessarily
13 remember, because it's a lot of information, and then I'm
14 going to sit down and Mr. Frick is going to get up and he's
15 going to talk to you. All I ask is that you never lose your
16 common sense about what's going on, what the motivations
17 are, the smoke and mirrors that the defense may put up in
18 front of you. Remember what you saw from that stand. All
19 right. So let me just go through some of this with you.
20 First of all the stuff is the legal stuff. Criminal sexual
21 conduct with a minor first degree and second degree.
22 Sometimes people are like, "Why is it first degree? Why is
23 it second degree?" You know, in some states we have murder
24 in the first, second, third, or murder in the second degree,
25 you know, these things, that's not how our law works. The

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1 second degree means the age of the child who was sexually
2 abused. So in CSC with a minor first degree, that means the
3 child had to have been under the age of 11 at the time of
4 the sexual battery. Sexual battery, the Judge is going to
5 tell you -- you know, when you hear battery you're thinking,
6 "Oh my God, horrible, forceful rape holding someone down,
7 beating them up." Battery is not that. It is but it's not
8 for child sexual abuse because children can't consent to
9 sex. Okay? So number one. So anyone who places some type
10 of an object or penetrates a child under the age of 11 in
11 either their anus, their vaginal opening by using a finger,
12 by using a dildo, by using their penis, that is sexual
13 battery. That's it. Okay? It's that simple. And it
14 doesn't have to be, "Well, he only put it in a little bit,"
15 it doesn't matter. Any intrusion however slight. Okay? So
16 that is all you have to find. You only have to find that
17 happened once. While **Minor 2** who was the child that was ten
18 until April 22nd of 2019, up until the time when they were
19 living on Ella Street, you have to find unanimously that
20 that defendant somehow placed some object, whether it was
21 his penis, his finger, a dildo or whatever, into her vagina,
22 into her butt, guilty. Okay? Then we've got CSC with a
23 minor second degree, that would be for **Minor 1**
24 turned 11 on December -- I believe her birthday is the 9th,
25 December the 9th, that would have been 2018. Once again,

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1 they're already living on Ella Street in Chester. And if
2 you remember the defendant said, "Yeah, we moved over to
3 Ella Street some time in November." That's why I had the
4 DSS agent who got up here, or my cocounsel did, asked him
5 when was that first little DSS intervention, they had
6 something about bed bugs, that's not even relevant, it
7 wasn't that. I wanted you guys to have a timestamp as to
8 when they moved to Ella Street because that's when the
9 jurisdiction matters. So some time in November to December
10 is whenever we know that the house of horrors that I've been
11 talking about, Ella Street, this is where the abuse was
12 going on where the normal for **Minor 1** was multiple accounts
13 of sexual penetration by her father. She was 11. So the
14 cutoff to be second degree is the age of 11 to 14. That's
15 why the charge for CSC with a minor second degree relates to
16 **Minor 1** from the time she turned 11 in December of 2018 up
17 until some time -- up until he decides that he finds another
18 woman, which I will go over that. Incest. He had sex with
19 his daughter. I mean, there is just no -- I don't think I
20 have to explain that to anyone of y'all. Okay? All right.

21 **Minor 2** So here is **Minor 2** She's ten at the time of the
22 sexual assault. All right? So you heard from her from the
23 stand, you heard what she had to say. She got up and told
24 you about her first sexual experience at the hands of the
25 defendant. I promised you before this case started that you

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1 would hear that. She got up there, told you what happened,
2 how it happened, how she bled, how her mom didn't protect
3 her, how her mom put a pad on her instead of taking her to
4 the doctor. There's no excuse for either one of them.

5 **Minor 1** 11 years old at the time of the sexual
6 assault. Oldest child. Loves her dad. Still didn't want
7 him to get in trouble. Still loves her dad even though he
8 sexually penetrated her with his penis over and over again.
9 All right. So timeline of events just to kind of wrap it
10 up. I don't know, it might be a little bit hard to see. So
11 we know that they meet May 2018 in the diaper aisle of
12 Wal-Mart. Okay? And they're on Plenty of Fish, they start
13 dating. They move to South Carolina about a month later or
14 some time in the summer, and they're in Blackstock because
15 there's a family member of the defendant's that was dying
16 from cancer. And so the thing that was really interesting,
17 and it's amazing because when you -- there's so much
18 information in this case and that's why I kind of wanted to
19 break it down for you, but I'll be completely honest, I was
20 listening to the defendant's statement again last night and
21 I was like, "Wait a minute, in his last statement on
22 September 16th of 2019 he admits that he walked in on Sarah
23 sexually abusing his (sic) daughter in Blackstock." I don't
24 know why that never hit me until last night. That would
25 have been when they first moved to South Carolina and it

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1 just dawned on me. And, I mean, I've gone through these
2 things, I've written them down, highlighted and everything,
3 and I'm thinking he from that point before they even moved
4 to Ella Street knew that this woman he was with is sexually
5 molesting her own daughter and he doesn't call the police?
6 He's like, "You know what? Let's just keep the family
7 together, let's move to another place." Because, you know,
8 Blackstock is when they were living with -- some of his
9 family members are close by. "Let's become even more
10 isolated, get this house on Ella Street and we'll see where
11 we can go from there." So November 8th of 2018 they moved
12 there, Ella Street, nine kids, two adults who obviously
13 have very deviant sexual desires. I don't think anybody can
14 argue about that. Then Minor 1's 11th birthday. Of course,
15 I have to prove beyond a reasonable doubt that by the time
16 that she was being sexually abused by the defendant -- and
17 let's just say, okay, Sarah sexually abused these kids. I
18 am not at all minimizing her role in this. All right? But
19 I am here for the State to prove beyond a reasonable doubt
20 that this defendant, he wasn't just an observer, he did it.
21 Now, April 14th, 2019. This is about around the time that
22 they went to Bush Gardens. You've heard all of this thing
23 about Bush Gardens. They were up in a hotel room and Sarah
24 supposedly got mad at Minor 1 said something smart
25 to her, and then there was a punching, there was a hitting,

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1 and then him being the brave "I'm going to protect my
2 daughter," because obviously that's what he's all about, he
3 says, "I grabbed Sarah and I pulled her up and I was like
4 'don't you ever hit my daughter like that again.'" Now,
5 let's think about that. You can send me text messages where
6 you want to sexually abuse my children. You can send me
7 videos of my child's vagina. You can send me other stuff
8 where I'm going to pretend to like it because when I'm not
9 home I'm worried if I don't act like I like it that you may
10 abuse my children. I can't even believe he has the ability
11 to try to say one thing like that and try to explain it with
12 a straight face when he's talking to the police. Supposedly
13 they broke up. Sarah goes to Florida and she's meeting with
14 her parents, then she says she doesn't want to be with her
15 parents, we love each other, bla, bla, don't break up the
16 family. Why doesn't he want to break up the family? He
17 will lose Minor 2 Remember, there was something in his
18 statement where he said, "You know, whenever we broke up
19 Sarah called and told me that Minor 2 wouldn't eat, like she
20 had to look for five different places for a couple of days
21 because she just couldn't eat because she missed me so
22 much." No. He missed the ability to have his toy, that's
23 where that came from. All right. So he starts messaging
24 her through Facebook. All right. So he knows her, they've
25 known each other for years, he's from Chester originally so

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1 he has some type of connection with her. So maybe he thinks
2 things are starting to kind of really fall apart with Sarah,
3 I don't know, I don't want to try to know what he's
4 thinking. So what we're going to do is we're just going to
5 look at this timeline so you can figure out where we are.
6 He -- and according to what Heather says, Corlew is
7 basically telling Sarah, "Hey, I'm going to leave. I'm
8 going to go live with Heather, this isn't working out, but
9 if you don't have anywhere to go or anything I still love
10 you, I will help you with the kids, I don't want you out on
11 the street. Even though you're sexually abusing your
12 daughter, you're sending me sexual text messages of my
13 children, you are taking pictures of my children's vaginal
14 areas, you're tying up Bradley, hogtying him, sitting on
15 him, twisting his arm and asking me to have sex with you in
16 front of my children." Ladies and gentlemen, within all of
17 those lies the seeds of the truth are your common sense.
18 Think about it. He was doing it. He wanted her there, he
19 wanted to control her, he wanted to control her children.
20 She was a willing participant, don't get me wrong, but
21 that's what was going on. Late July of 2019, Corlew moves
22 in with Heather. Sarah goes to Rock Hill, reports a
23 domestic violence incident. Who cares if she was mad
24 because he was leaving her for another woman. Does it
25 change the fact of all of the sexual abuse and the sexual

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1 acts and the pictures and the text messages and the domestic
2 violence? "She slaps me, I'm slapping her back, she knows
3 that. Heather knows that's how I am." That doesn't change
4 who he is and what's already happened. Who cares why she
5 told the police. Now, I know the defense is going to say,
6 "Well, this whole thing was brought up because she was
7 jealous, that she wanted her man back." So she goes and
8 meets, she talks to the victim advocate August the 23rd of
9 2019, domestic violence, she tells sexual physical abuse.
10 Well, guess what? She loses her kids, EPC'd. So then what
11 do we have? Interview with Corlew by Sanders. That's a
12 really interesting interview, because you can tell he's
13 feeling out the police just like they're feeling him out.
14 He, by that time -- why do you think he just willingly
15 offers up his phone? I'll tell you why. "To my sun, moon
16 and stars" -- y'all can read this for yourself. This is to
17 Sarah Lacy after he's been arrested. "PS. The videos I
18 took on her trip I didn't turn in, I deleted them. But
19 Harris got my phone out of property so I don't know if he
20 recovered them, but I didn't take any of you saying anything
21 incriminating. They don't have much evidence, let's stick
22 together. If we stick together we can beat this. I love
23 you." Oh, when did he send this? October the 28th, 11 days
24 after he had told Heather, "I love you. Why aren't you
25 supporting me? What's going on? Why isn't anybody standing

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1 beside me?" He's playing everyone. Don't let him play you.
2 Don't let him do it. All right. Blames all the abuse on
3 Sarah. What else can he do? If he doesn't blame it on her
4 he has to admit he's a monster. Okay? Because he was
5 telling Heather, "I'm not a monster. I'm not a monster. I
6 would never do these things." Why does he use that word?
7 Because he knows someone who would have sex with his
8 daughter, have sex with Minor 2 allow the kids to run around
9 with dildos and penetrate one another and have sex and
10 everything else that they were doing, only a monster would
11 allow that to happen. And he admits he knew it. He
12 admitted it in that first interview. And Sanders says, Hey,
13 we're going to interview your kids next week." He gets the
14 phone, he's not under arrest, the kids are still in his
15 custody, think about that, ladies and gentlemen. These kids
16 who have been terrified, who had no way out, they finally
17 get in the situation, not because the defendant is a nice
18 person, but because he decides he's found another woman he's
19 going to manipulate, that being Heather, he gets her there.
20 And remember what Minor 1 said? Things kind of got normal
21 for awhile, they get stopped. So then what happens is he
22 takes Minor 1 to the side, remember she told you, "He told
23 me not to say anything," because he knew they were going to
24 be interviewed. Now, did Minor 2 know that? No. Because
25 the kids were taken from Sarah the very first day she went

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1 to the police station, but Minor1 knew. And look at how
2 much more mature Minor1 is. So her dad is telling her,
3 "You better say everything was Sarah, because if you say
4 anything about me our family is going to be split up."
5 Remember what the expert said? That is another trauma these
6 kids have to go through. She didn't want that on her. He
7 put that guilt on her on top of everything else. Then he
8 says, "You know what? I've got a plan. If I ask Heather to
9 marry me and she does, then if something does happen my kids
10 can stay with her." I'm not asking you to understand how
11 this guy's mind works. As a matter of fact, I wouldn't try
12 to understand it if I were any of you jurors, but I can just
13 tell you, it speaks for itself with the evidence that's been
14 brought before you. He marries her. He comes back. Then
15 he decides, "I've got to leave for a few days, it's getting
16 a little too hot for me under the collar." He knows the
17 kids are going to be interviewed soon. September 5th, he
18 allegedly attempts suicide according to Heather, she told
19 you about that. It was just too much for him to handle.
20 September 6th. DSS goes there, they talk to him, they put a
21 safety plan in place. No offense to DSS, I still don't
22 understand how that happened. I mean, we're already hearing
23 information that these kids are being exposed to all kinds
24 of stuff, but for some reason they did not remove the
25 children at that time. That's not my decision, I have to

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1 live with what happened. So these kids are still being seen
2 by their father. Then before the kids go to the
3 interview -- it's hard to keep up with, that's why I put it
4 up here -- September 9th, he runs off with Sarah. Remember
5 the Xbox stuff, and you can see it when you go back there,
6 that Heather saying she was seeing? She's thinks he's going
7 on a trucker run because that's his job, and then he's
8 saying, "Why are you not convoing (phonetically) with me?
9 I'm just trying to help you and shit. I'm not trying to
10 fight, trying to work with you. They're taking my kids.
11 Give me a number." They meet, they go out of town, he's
12 already married to Heather, and they're making a plan to
13 hide or destroy evidence, which he confirms in his letter
14 after he's arrested. So now we get to kind of the end.
15 Forensic interviews with the children. Corlew children are
16 EPC'd. Then Corlew comes in for his second interview. He's
17 just gotten back from spending all this time with Sarah,
18 still going to stand behind his crazy explanations of
19 knowing sex is going on but still not actually technically
20 being involved, and he gets arrested. We have medical
21 examination of the kids. Statements by Corlew. Look, I
22 mean, I don't know how y'all can even erase all of that out
23 of your minds, but I just put it up here because here is the
24 thing. She abused kids, he stayed. Sarah wouldn't clean
25 the house, pooped in the floor, walked around naked,

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1 disgusting, he stayed. Then we get to a new level of abuse,
2 it kind of works us into it, she wanted to have sex in front
3 of the kids, sent videos of herself masturbating in front of
4 the kids. Let the kids play with dildos. Let the kids
5 watch porn. Touched the kids. Still, he stayed. This is a
6 father of five children. Why did he stay? Sexual
7 gratification, that's it. "So did she ever bring up sexual
8 things about the kids? Yeah, maybe to role play with them
9 and stuff." Role play? Let's talk about role play?
10 "Sarah, are you touching Minor1 right now? Yeah. How does
11 that make you feel? That turns me on. Great." I don't
12 know if that's what they said, I don't care to know if
13 that's what they said, but that's what role playing when you
14 are sexting means, it is for sexual gratification. "She
15 would talk about messing with kids and stuff like that and I
16 would try to ignore it." Oh, because you're a good dad. If
17 you ignored it it doesn't matter, you're still a good
18 father. Okay. "So then she talked about touching our own
19 kids, her nieces and stuff like that. When she talked about
20 her kids in a fantasy way," this is Nick asking, "Well what
21 would she say? Oh, she just wanted to touch them mostly
22 when I was out on the road." Because remember, he's working
23 hard for the money and so he's out there for the children,
24 that's what he's doing. "Did she have toys? Yes. Where
25 did she keep them? In the drawer. Oh, but you know what?

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1 Sometimes they were out and the kids would just run around
2 with them." Dildos, which we know were actually being used
3 on people's bodies. "I didn't want Sarah back, I wanted her
4 kids back." That's a little bit of a disturbing statement.
5 I'm just going to let that sit with you. Then she would
6 talk about the kids, messing with them. She's freaky. Piss
7 and shit on the floor. But he's not freaky. "Did she ever
8 send you a sexual video?" This is what got his phone taken,
9 because guess what? If you have someone sexually doing
10 something for sexual gratification in front of a minor it's
11 illegal. So, yeah, they took his phone. Now, here's the
12 thing that's interesting, he said, "I had nobody to help me.
13 My grandma wouldn't, my mom wouldn't," and all of this other
14 stuff. Grandma supposedly goes over there one day and Sarah
15 is walking around naked with the son in the house. Now, I
16 don't know where any red flags could have been brought up
17 any higher, bigger, waved any harder, I don't know why
18 someone didn't step in and do something for these children,
19 except for the fact that the defendant has a way of
20 manipulating the people around him. He manipulated Heather,
21 he manipulated Sarah. I mean, Sarah was a willing
22 participant, don't get me wrong, but don't let him
23 manipulate the evidence in this case and what you see.
24 Okay? "Are we going to find anything sexual on the phone?
25 Yeah. I talked dirty with her about the kids but I tried to

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1 avoid it. She did want me to have a baby so we could have a
2 toy." A child. And he even referred to it as it, "She
3 wanted us to have it for a toy." It. So anyway, "Brad
4 walked in, she was giving me a blow job. Sarah was loud
5 when we were having sex. I didn't want to do it in front of
6 the kids. She did." I mean, if you want to listen to it
7 all again we can play it back for you, but I think enough of
8 it sticks in all of your minds that you're probably never
9 going to forget it and you will see exactly what I'm talking
10 about in regards to who the perpetrator is in this case.
11 Okay? All right. In order to believe the defendant's lies
12 in his statement that, you know, it was all Sarah and that
13 all of this stuff was going on without his knowledge, or
14 otherwise he knew it but he was like, "I just didn't have a
15 babysitter so I had to let the kids stay there." Okay.
16 That's his rational. So in order to do that it would have
17 to be the most diabolical, complicated conspiracy by two 11
18 year old girls ever, one of them being disabled on top of
19 that. So they would have had to both remember to talk about
20 the online store, Adam and Eve. They would have both had to
21 remember, oh, the lubricant was used when they were being
22 sexually abused, and remember to say that there were
23 handcuffs used for sex toys. They would have had to say
24 there were several dildos different sizes and different
25 colors. These kids have not even been around each other for

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1 a couple of months, so they would have had to have been
2 somehow infiltrated by the defendant -- I mean, by Sarah to
3 get them to say that to remember that specifically so they
4 could say it during the forensic interview and then come in
5 front of all of you, a bunch of strangers, and then repeat
6 it to you. You would have to believe that's what happened.
7 A diabolical plan by Minor 1 and Minor 2 I'm not going to
8 go through all of the witnesses, you already know who they
9 are. I'm just going to hit some high points in regards to
10 this. You know what Ms. Tobias told you, how she got
11 involved. A lot of this I put up just to remind myself so I
12 apologize off the top. I've already told you about the DSS
13 worker. Heather Judd. She was just duped, ladies and
14 gentlemen, and no offense to her but that's exactly what
15 happened. Margo, her testimony. I think that's really
16 something I hope when y'all were listening to whenever --
17 when Minor 1 came back she was like, "I am so sorry I lied
18 to you about saying my dad didn't do anything." I mean, it
19 was almost like a breath of fresh air. She went in there,
20 she kept apologizing, she was like, "I want to tell you what
21 happened." He's not -- she still said, "My dad is a good
22 man." I mean, this is a child, ladies and gentlemen, all
23 right? It is not someone who is an adult who's trying to,
24 you know, get her dad in trouble. That is what she didn't
25 want to happen. All right? And then Minor 2 I think

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1 Minor 2 speaks for herself as well. So I've already told you
2 about the interview. Clearly in regards to what I have to
3 prove beyond a reasonable doubt there was vaginal penile
4 sex, there was penetration with dildos, there was
5 penetration with hands, so all of that's there. Guilty of
6 CSC with a minor second degree because of her age. She was
7 11. Minor 2 same thing. Sexually penetrated with her
8 vagina, penis, many times, penetrated her vagina. She would
9 bleed. Actually resulted in medical evidence of sexual
10 trauma to her hymen. That only happens in about 14 percent
11 of the cases, and she has scarring to her vagina. He also
12 showed her a pocketknife. Remember when she said something
13 that was kind of weird? She was saying he would pull out a
14 pocketknife and threaten me? Did you notice what Nick
15 Harris said in the last interview about, "Hey, I see that
16 pocketknife in your pocket. You know, I'm a cop, that makes
17 me weirded out, please take it out of your pocket." He had
18 a pocket knife on him all the time and he used that to
19 threaten those children. I told you about their testimony,
20 that was to make sure I didn't forget anything. Sarah. I'm
21 just going to go ahead and tell you, I made a deal with the
22 devil, I did. Hold that against me, don't hold it against
23 the children. These cases are not easy. These cases
24 involve children who have to get up and testify about these
25 horrible things that have happened in their lives. She

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1 already confessed. By the time that I got to her and by the
2 time she pled and entered into the deal a year later she had
3 already given up everything. I didn't need anything else
4 from her except for her to get on that stand and accept
5 responsibility, and that's what she did. And if she didn't
6 and she lied about anything, guess what? She can go over
7 there and it will be her turn next. Don't hold it against
8 these kids. You know about her statements. I wanted to
9 bring every bit of evidence to you in such a way to where
10 you would walk out of here with no doubt, not beyond a
11 reasonable doubt, no doubt as to his guilt. Expert digital
12 forensics. Look, she just tells you what she sees, she's
13 not going to sit here and give you an opinion. But she did
14 say she tagged items that had an erect penis being
15 stimulated and what appeared to be a child's face in the
16 background behind the couch. Then there's another one with
17 a timestamp with an erect penis and a bedspread showing
18 children in the bed where someone was stimulating their
19 penis sleeping at the same time. Okay. That's all she
20 does, she reads what's there. She said it was not an
21 embedded something pulled off the internet, it was a picture
22 that whoever had the phone took the picture. Well, maybe he
23 let someone else borrow his phone so they could record their
24 penis with his children, you can definitely believe that
25 happened. Dr. Lamb. I've already told you, Minor 1 no

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1 medical findings, which is actually normal. But Minor 2
2 unfortunately from the bleeding, from the penetration, she
3 does have some scarring. She was sexually penetrated.
4 There was no sliding down the banister and running into a
5 pool stick, this was sexual assault. All right. So here we
6 go. I'm sorry, I could talk for a long time because I want
7 to make sure y'all remember everything. I'm just going to
8 ask you to please take your time, think about everything.
9 Think about what's reasonable. Think about what those girls
10 tell you from the stand, which is direct evidence. Talk
11 about it. And when you do CSC with a minor first degree,
12 penetration, that's Minor 2 If you believe that -- you
13 believe what Dr. Lamb said in the physical evidence, if you
14 believe what they told you, what she told you, he is guilty.
15 Okay? Now, CSC with a minor second degree. Penetration.
16 Oh, and oral sex. We've got to bring up something else for
17 y'all to think about, but the oral sex. Minor 1 said he
18 made her perform oral sex on him. She demonstrated it, she
19 showed you how he would hold her head, she said he
20 ejaculated, and so did Minor 2 Okay? I forgot to say that
21 that would be another diabolical plan of 11 year olds to
22 remember how to talk about oral sex and what it was like and
23 what came out of the penis. So use your common sense.
24 Guilty. Incest: Guilty. Remember when he said he's not a
25 monster? I'm going to leave that up to all of you. Thank

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1 you, Your Honor.

2 THE COURT: Thank you, Madam Solicitor. Mr. Frick?

3 MR. FRICK: Thank you, Your Honor. I'm not used to
4 standing behind one of these podiums but I'm going to try to
5 do that today. I told you on Monday it was going to be a
6 long week, it was going to be a rough week, you're going to
7 hear a lot of stuff you didn't want to hear because we've
8 all lived with this case for a long time, and that's exactly
9 what happened. The only thing I will echo that the
10 solicitor said, I am sorry you had to hear all of this, too,
11 because stuff did happen in this case. Bad stuff happened
12 in this case, and it's stuff that shouldn't have happened,
13 but none of that means that Bradley Corlew is the person who
14 did it. Now, just going back through this -- y'all are the
15 judge of the facts. Y'all will very soon get what's been
16 put into evidence and you get to consider what you've seen,
17 what you've heard from the witness stand and you get to
18 weigh it and you get to determine what you want to believe
19 and what you don't want to believe. As you've been told and
20 you are going to be told again by the Judge and I always
21 echo, when a person gets on the stand puts their hand on the
22 Bible and swears to tell the truth, you don't have to
23 believe them because they do that. You get to determine
24 whether you want to believe them or not. And there's
25 several things that you can do in that, and I'm not telling

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1 you how to do it, but just reminding you what you can do.
2 You can look at their demeanor. You can see how they answer
3 questions. You can decide whether they had any bias or
4 motive to say what they said, and then you can decide
5 whether you want to believe anything they said, all of what
6 they said, or maybe you do believe part of what they said
7 but the other part of it was just junk. That's your sole
8 province. That's what y'all get to go back to that jury
9 room and do to hash that out. And I commend you. I've been
10 watching. As I sat over here and watching these long
11 interviews, y'all were very attentive so I know you will do
12 your job diligently. And I know I am just essentially
13 preaching to the choir when I say this but I have to tell
14 you all of this, they've got to prove to you beyond a
15 reasonable doubt that Bradley Corlew did these horrible
16 things to Minor 2 and Minor 1 Now, beyond a reasonable
17 doubt. Again, it's not, "I don't know, it's, you know --
18 they've got this stuff, it kind of looks like maybe he did
19 it so I think he did it." That's not enough. It's not
20 maybe, it's not even probably, it's got to be, "I don't have
21 any other reasonable explanation." And for this case in
22 particular I remind you, it's not because, "I just don't
23 like this case, it's nasty. I've been sitting here and I
24 listened to Bradley Corlew and he says nasty things
25 sometimes, used bad words, looks at porn on the internet,

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1 has nasty things on his phone. I don't like him." That's
2 not enough, ladies and gentlemen, that's not enough. It's
3 got to be have they proven with competent evidence that he
4 did what they say he did and there's no other reasonable
5 explanation. Again, don't let emotions get tied up in this.
6 It's easy. It's easy. I told you at the beginning I've got
7 a daughter, I know how I would feel, but ladies and
8 gentlemen, this is not what this is about. This is about
9 making sure that we apply the rules and the rights that we
10 all enjoy in this country, and that is to be innocent until
11 you're proven guilty. So remember your oath. You took an
12 oath at the beginning to do that. And again, I know I'm
13 preaching to the choir because I've watched you, you paid
14 close attention, I know you will all apply your oath. So
15 let's get to it. How did we get here? And the solicitor
16 was exactly right, I am going to blame Sarah because it's
17 her fault. That's how we got here. Sarah was angry,
18 jealous, and out of touch with reality. She goes to the
19 Rock Hill Police Department and tells this story. First of
20 all it's, "He beat me." That's it. She's not forthcoming
21 with these sexual allegations, she just tells them, "I'm a
22 victim of domestic abuse. It happened some time ago but I
23 thought I would come in here today in Rock Hill and tell you
24 about something that happened in Chester." And we'll get to
25 being in Rock Hill in just a second. And then she tells

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1 this incredible story when she gets to Chester, starts
2 disclosing this information. Then she confesses. Then she
3 realizes, "uh-oh, I'm in real trouble," and she did make a
4 deal. Let's go through Sarah a little more. On August 20th
5 she goes to the Rock Hill City Police Department to tell
6 them, "I'm a victim of domestic violence that happened
7 probably about a month ago or last time, but I just figured
8 I was up here in Rock Hill, I would stop by and tell you all
9 about it." She goes -- and she makes a big deal of -- I
10 believe her term was, "I ran my ass to Rock Hill to get away
11 from him." You also remember she said he was in Rock Hill
12 because we were supposed to go to a doctor's appointment.
13 Interesting. Anyway, eventually she ends up back here in
14 Chester and gives the first statement on the 23rd. And they
15 very nicely hand her a stack of papers and say, "Hey, write
16 this all down and just bring it back when you can," and she
17 does six days later. Not on the 26th when she stopped by,
18 you've got the Miranda form where she came by that day, too.
19 But she comes by six days later, wrote a 16 page statement,
20 and then comes back in and there's a subsequent interview
21 September 16th. She said on that witness stand, "Everything
22 I said on that statement," my take home statement that I
23 turned in on the 29th, "was true and accurate." It was a
24 sworn statement then, she came in this courtroom, sat on
25 that stand and said that's what happened. Even though when

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1 I reminded in her interview with Nick Harris at city hall on
2 the 16th she said, "I overexaggerated a little bit, it
3 wasn't all true," she admitted it. Even Brian Sanders says,
4 "Yeah. What she said on the 29th in that statement and what
5 she said on the 16th, not exactly the same thing." She's
6 already lied to you, folks. That's it. That's it. Okay?
7 Now, that's not the whole case, but she's already
8 established she's not very credible. She admits that she
9 committed sexual abuse on Minor 1 and Minor 2 She admits
10 she performed oral sex on Minor 1 and Minor 2 We then talk
11 about this isolation, couldn't go anywhere, couldn't do
12 anything. She said, "We weren't allowed to go to the
13 doctor." Yet the reason why she was in Rock Hill on
14 August 20th was for a doctor's appointment. Minor 1 told
15 you, "We went to the doctor a lot, for the kids, for her."
16 Then it's all Brad's fault. "Yeah. I mean, I used dildos
17 and sex toys and oral sex and rubbed them, Brad made me do
18 it. It's all his fault. He was coercing me." The man who
19 was in a truck 60 hours a week that he had to go get from
20 Columbia, an hour away, pick it up. You heard him today,
21 "4:00 in the morning I would leave Chester, pick up my
22 truck, go wherever I'm supposed to go that day, sometimes
23 didn't get home that night, stayed over a couple of nights."
24 All this coercion while he's in a semi hundreds of miles
25 away. Okay. Then she says when confronted about her

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1 statement on the 16, "Oh yeah, well, Brad made me do that."
2 You may recall, I did this for a particular reason, I
3 pointed to the screen and asked where Brad was in the room.
4 You may recall he was not there. It was Nick Harris, I
5 believe Keesha Tobias was there, and Ms. Lacy. Three people
6 in the room. She's in law enforcement. I don't know how
7 she's getting coerced, but okay, Brad coerced her. Fine.
8 And then I just put this out there. I found this
9 fascinating because she talked about it on the stand and she
10 talked about it in her take-home statement, Brad is in to
11 bestiality. Even the solicitor asked, "Did you ever see him
12 do anything? Well, no." Ladies and gentlemen, I don't know
13 what more you need on credibility of Sarah Lacy then any of
14 those issues. But there's one more thing, it's the fact
15 that once she found out how much trouble she was really in
16 she knew she had to save herself, and she did. She got a
17 great deal. Facing life she ended up making a deal where if
18 she cooperated and testified truthfully from that stand in
19 this trial, she's going to get a 15 year sentence total
20 where she's going to be parole eligible, and as she said,
21 "If I don't do it I'm going to get life." She made a
22 tremendous deal, and she kept up her end of the bargain, and
23 the end of the bargain is, "I've got to get on that stand
24 and say that everything I said in that take-home statement
25 was true." And she did it, I'll give her credit for that.

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1 It's not the truth but she did her end of the bargain. Now,
2 ladies and gentlemen, I mean, I apologized to Minor 1 and I
3 meant that, that was not a show for y'all. I am sincerely
4 sorry that these children had to get up here, just as I am
5 sincerely sorry that y'all had to sit and spend a week
6 listening to all of this stuff. These children suffered
7 real trauma and they are suffering and they're trying to
8 overcome it and hopefully they'll be successful and
9 hopefully they'll have productive lives and put this all
10 behind them. But folks, the fact that we know -- it's a
11 fact, I'm not escaping it, I'm not trying to say, "Oh, there
12 was no injury to Sarah (sic), oh, well the other" -- no.
13 These children were injured. They were sexually abused.
14 They were sexually abused by the person who said they
15 sexually abused them, Sarah Lacy. All of the that, all of
16 that does not mean that Bradley Corlew is the one who did
17 it. Now, Minor 2 God bless Minor 2 she has got -- she got
18 dealt a poor hand to start with. She has got cerebral
19 palsy, she's got diabetes, she's got learning disabilities.
20 She has got a tremendous amount of issues to already deal
21 with compounded by this horrible thing that's happened to
22 her at the hands of her own mother. But let's talk about
23 it, because this is the evidence in the case, because I'm
24 telling you, you can forget about anything Sarah Lacy told
25 you. It's going to come down to what the children said, so

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1 let's talk about what they said. And, again, remember, you
2 get to determine whether there's any motive, bias or any
3 other issues here. So what did Minor 2 do? She's on the
4 stand, a homeschooled child, homeschooled. Okay? Knows
5 some very adult terms. She knows what dildos are. She
6 knows what vibrators are. When she does the anatomical
7 dolls she doesn't use names like Minor 1 did like wiener or
8 Lucy, she says penis and vagina. Minor 2 who I think
9 everyone could see is the less mature of the two of them.
10 Even I think Margo said she acted more like an eight or nine
11 year old than a ten or 11 year old. She knows some very
12 grownup words for a young lady who doesn't leave the house.
13 She ain't playing ball and learning it in the locker room,
14 she ain't going to school and hearing it in the hallway.
15 Where did she learn it? Home is the only place she was.
16 How did she learn these words? She learned them from Sarah.
17 Sarah taught these to her. She even knows where Sarah
18 bought the toys from. Sarah said she got all of these sex
19 toys from Adam and Eve. Minor 2 knows exactly where that
20 website is. Again, this is a homeschooled child who is not
21 out there in the world getting information like maybe a lot
22 of us did from other kids at that age. Then in all her
23 statements she talks about the abuse and she leaves Sarah
24 completely out of it. Even though Sarah has admitted, "I
25 did these things to her," she says, "Brad told me not to

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1 tell my mom." That makes no sense. She even said, "My mom
2 apologized to me." I submit this poor young girl still does
3 love her mom. I submit her mom has some influence over her
4 because she depended on her when she's not with her anymore,
5 but she's still living with Sarah's family, who I can't
6 imagine had very good things to say about Brad. She has
7 even had visitation with Sarah, she said she had it this
8 summer. This is all more time to influence this poor young
9 girl who had this horrible thing happen to her. So, ladies
10 and gentlemen, I'm just telling you, her statement in and of
11 itself doesn't make sense. Even based on what her own mom
12 says she admits she did, Minor 2 just leaves her completely
13 out. Now it comes down to Minor 1 We make a big deal that
14 she's still with Heather and grandma, Brad's mom. You heard
15 Heather say, "We got a long well, bonded even." You heard
16 Minor 1 say, "I mean, I felt like she really was my step
17 mom, I kind of wanted to call her mom." She said, "We
18 bonded." They could talk. Heather is a law enforcement
19 officer. When they tell her to go into the interview they
20 say, "Tell the truth." A law enforcement officer is telling
21 this girl to go into this interview on September 12th and
22 tell the truth. There was a safety plan in place. Brad is
23 on the road working. It doesn't make sense that he has this
24 opportunity to pull her aside with a law enforcement officer
25 in the house and say, "Oh, shh, don't tell anything about

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1 me." Minor 1 also told you she didn't want to lose her
2 family. Well, guess what happened after that interview?
3 She lost her family. So she goes back for another
4 interview, tells them Brad did it, she's back with her
5 family. Now, I did find one very interesting thing about
6 our blind expert this morning, she said when children go in
7 for interviews they usually don't know what's going to
8 happen to them with those interviews, and I think that's
9 correct. Minor 1 knew. After the first one she knew what
10 was going to happen, and then when we had second one. See,
11 in her first interview, again, there's the safety plan
12 that's in place that would prevent Brad -- if he influenced
13 her in any way they could take him to court. He could be --
14 have whatever kind of trouble the Judge would dole out at
15 that point in violation of that order. She's told to tell
16 the truth. She talks about the physical abuse to the
17 children. She says Sarah would punch them, I think bit her
18 one time, pulled hair out, gave Bradley, Jr. the black eye.
19 Such physical abuse that he had to be held out of school.
20 In her second interview and now -- there we go -- the second
21 interview we're now in foster care and she's away from her
22 family. And Margo, whose job is to do these interviews
23 said, "I want them to come in with no information. All
24 right? I don't want anybody talking to them. I don't want
25 them to have any information and I don't want them to have

CLOSING ARGUMENTS

1 talked to a whole lot of people, preferably nobody except
2 me." Well, despite all of that, despite the prior
3 interviews we had the second interview, and in this one she
4 says there was a lot of abuse, it happened multiple times,
5 but there was still kind of a limited number. It was like
6 this happened three or four times and this happened three or
7 four times and this happened three or four times. Now, not
8 to minimize it, but she said it only happened this number of
9 times, whatever the abuse may be. She says, "My dad is a
10 good man but he did some bad things." She also said she
11 wanted to go home and then she tells Margo after asked, "Why
12 are you saying this now?" She said, "Well, everybody
13 already knows dad is already in trouble and in jail." Good
14 friend this morning was right on that, Minor 1 knew what was
15 going to happen. She knew when she told them before, "No,
16 my dad didn't do anything," that wasn't what they wanted to
17 hear so they took her away. She wanted to be back with her
18 family. She tells them Brad did it and she gets reunited
19 with her family. Now, I have a couple --

20 (Break in proceedings.)

21 (Part of Minor 1's interview was played.)

22 MR. FRICK: She very specifically says he was a good
23 man, he made mistakes.

24 (Part of Minor 1's interview was played.)

25 MR. FRICK: Basically the same thing again.

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1 (Part of Minor 1's interview was played.)

2 MR. FRICK: Interesting that it's the same words over
3 and over. Interesting that at one point she says, "He
4 doesn't deserve to go away -- well, he deserves" -- it's
5 like she's trying to remember what am I supposed to say.
6 Now, again, that's y'all's judgment but I'm telling you,
7 that looks a little suspicious.

8 (Part of Minor 1's interview was played.)

9 MR. FRICK: That's about the fourth time we've said the
10 same line, "My dad is a good man but he's done some bad
11 things." And then --

12 (Part of Minor 1's interview was played.)

13 MR. FRICK: She wanted to go home. And I can't blame
14 her for that one little bit. So she comes here for court
15 testimony, and we've added a little bit more to it. On the
16 stand she says, "Yeah, it was Sarah that punched Brad, Jr.
17 and Brad." Never said that before up there this week. She
18 also said about the abuse that she had had where she was
19 punched, you know, the story that the solicitor talked about
20 up here about at Bush Gardens where she gets punched, she
21 said that that was Brad who did that. All of the sudden
22 it's not Sarah anymore, "We were in Virginia and he punched
23 me." The story is changing. She was asked, "Well, you
24 don't get to do kid things," except they went to Carowinds a
25 lot, they had a season pass. They went to Bush Gardens, you

CLOSING ARGUMENTS

1 heard about that. She was going to school. She was
2 going -- you heard her testify, she, despite the days that
3 she missed, has been on task and is in the right grade, so
4 she was still going to school, and she was going to doctors
5 appointments. She's the one who said, "We used to go to a
6 lot of doctors appointments." And now instead of it being
7 limited abuse it's almost every day and almost every night.
8 She also said on the stand after the second interview, "I
9 thought I'd be back with my siblings," and she was. She
10 also said when asked how did it feel to be in foster care,
11 "It felt weird." Didn't want to be there. Again, don't get
12 me wrong, ladies and gentlemen, I'm not trying to minimize
13 anything that happened to these children, it was a horrible
14 thing, but you've got one who was just parroting what her
15 mom has told her, and you've got another one who learned the
16 lesson of, "If I don't tell them Brad did it then I won't
17 see my family. And dad is already in trouble so I just
18 can't do nothing about that anymore, but I want to get back
19 to my family so I'll tell them Brad did it." And it
20 continued even through this week the changing of the story,
21 the adding to it, the making the abuse even greater than the
22 original story. Let's talk about this for a second.
23 Because you've got pictures of a penis on your phone does
24 not mean you're a pedophile. I don't know why people do it,
25 it escapes me, but it's a thing that people do, and it's a

CLOSING ARGUMENTS

1 thing people have done probably since the second day there
2 was a camera there was a penis picture. Folks, we're weird
3 sometimes. Okay? We're all human, we all have our weird
4 little things, but there are penis pictures on his phone.
5 He looked at porn. Again, since the second day we probably
6 drew on the cave wall there's been porn. And it wasn't
7 kiddy porn he was looking at, he was looking at legal porn
8 that is registered with the federal government and
9 trademarked, it's a brand. I'm not asking you to like porn
10 or endorse porn or say it's good to look at, what I'm
11 getting you to understand, though, is it's not illegal.
12 Nothing he had was illegal as far as what he was looking at
13 on the porn, and it doesn't mean because you look at porn
14 you're a pedophile. He met a horrible, horrible person.
15 Why he moved in with her, why he stuck with her is beyond
16 comprehension, and he doesn't even really understand it to
17 this day himself. But because you've got yourself in a bad
18 relationship, that doesn't make you a pedophile. You move
19 out. And I do find it interesting. I mean, you know, it's
20 coercion, it's all Brad's fault, Brad made me do these
21 horrible things to my children, except one thing, **Minor 1**
22 said it didn't happen until we moved in with Sarah. Once we
23 moved back in with Heather nothing happened. If he's the
24 one doing it, why did it happen only when they were with
25 Sarah? Why did it stop when they left? Being accused --

JURY CHARGE

1 this goes back to what I was talking about, please, please,
2 please, keep emotion out of it. Again, go back there, cuss
3 about it. Say, "This is the most horrific thing I've ever
4 seen in my life," and it may be and it probably is and
5 probably should be because it is horrible what these
6 children went through, but again, that's not what this is
7 about. We're not weighing whether what happened to the
8 children was a bad or good thing or not. It's not. It was
9 horrible and it happened. What we're here for is did
10 Bradley Corlew do it. And I suggest to you when you weigh
11 all of the evidence, when you go back there and discuss it,
12 put emotion aside, apply the law as I know you will as good
13 diligent jurors I've watched all week, that you will surmise
14 the State has not met its burden and you will find Mr.
15 Corlew not guilty on all charges. Thank you very much for
16 your time, attention and service.

17 THE COURT: Thank you Mr. Frick. Let me have everybody
18 stand up real quick and stretch. I'm going to talk to you
19 now and give you the law. I want to make sure y'all listen
20 real good. Okay? And I'm coming down here because the
21 glare from these panels is annoying, but hopefully y'all
22 will be able to see and hear me better. Okay? Y'all can
23 sit down now. My instructions to you should take about 15
24 or 20 minutes. Are y'all okay with going forward now or you
25 want to take a quick restroom break? All right. Well

JURY CHARGE

1 Mr. Foreman, members of the jury, you have heard the
2 testimony, the evidence and the arguments of both the State
3 and the defense, I will now explain to you the law that
4 applies to this case. Now, under the constitution and laws
5 of South Carolina you are the finders of facts. I don't
6 have the right to pass upon the facts or even express any
7 opinion that I may have as to what the facts are, because
8 that's solely for you, the jury, to determine. As jurors
9 then it is your duty to determine the effect, the value, the
10 weight, and the truth of the evidence that's been presented
11 to you during this trial. Now, as the trial judge it has
12 been my responsibility to preside over the trial of this
13 case and to rule upon the admissibility of evidence offered
14 during the trial. Again, you are to consider only the
15 evidence which has been presented to you from this witness
16 stand together with any exhibits which have been made part
17 of the record, which will be available to you for your
18 review when you deliberate. I'm charging you the law
19 applicable to this case now, because as the Presiding Judge
20 I'm the sole judge of the law in this case and it's your
21 duty as jurors to accept as correct and to apply the law as
22 I now give it to you and use that to reach your verdict.
23 Now, the fact, ladies and gentlemen, that I may instruct you
24 on various subjects in this case must not be taken by you as
25 indicating what you think my opinion of the facts are.

JURY CHARGE

1 Okay? Because that's solely for you to determine. Finally
2 I charge you that you should not be concerned with what you
3 think the law ought to be, but rather what I charge you the
4 law is. Now, you're the judges, the sole judges of the
5 credibility, also known as the believability of the
6 witnesses who have testified in this case, and of the
7 evidence which has been presented to you during this trial.
8 In passing upon credibility you can take into consideration
9 many things such as the demeanor or the manner in which a
10 witness testified; whether or not a witness had reason to be
11 biased or prejudiced; whether or not a witness' testimony
12 was contradicted on the one hand, or supported and
13 corroborated, or corroborated on the other hand. See, all
14 of these things you will consider bearing in mind that you
15 should give the defendant the benefit of any reasonable
16 doubt. It becomes your duty as jurors to analyze and to
17 evaluate the evidence and determine that evidence which
18 convinces you of its truth. Now, there's two types of
19 evidence which are generally presented during a trial,
20 what's called direct evidence and what's called
21 circumstantial evidence. Now, I'm going to give you some
22 law school definitions, and I don't want your eyes to glaze
23 over so I'm going to explain it to you. Okay? Direct
24 evidence directly proves the existence of a fact and does
25 not require further deduction. Okay? That is like eye

JURY CHARGE

1 witness testimony or stuff like that. Okay? Now, we also
2 have this thing called circumstantial evidence. That's a
3 proof of a chain of facts and circumstances which indicate
4 the existence of a fact. Okay? For example -- let me give
5 you an example. It's hot now, of course it wasn't too bad
6 this morning. Okay? Hopefully it will stay that way this
7 weekend. But soon we're going to have winter, and before
8 you go to bed just assuming one night you look outside and
9 you see the brown grass on your front lawn, you go to bed,
10 you wake up the next morning and you see snow on your front
11 lawn and footprints through the snow. Well, first you can
12 infer that it snowed. Secondly, you can infer that somebody
13 has been walking on your lawn. Okay? See, these are things
14 you can infer without actually having seen it happen. Okay?
15 That's a good example of what circumstantial evidence is.
16 Okay? Now, crimes may be proven by circumstantial evidence,
17 and the law makes no distinction between the weight or value
18 to be given to either direct or circumstantial evidence.
19 However, to the extent that the State relies on
20 circumstantial evidence, all of the circumstances must be
21 consistent with each other, and when taken together point
22 conclusively to the guilt of the accused beyond a reasonable
23 doubt. If these circumstances merely portray the
24 defendant's behavior as suspicious, the proof has failed.
25 Now, the State has the burden of proving the defendant

JURY CHARGE

1 guilty beyond a reasonable doubt, and that burden rests with
2 the State regardless of whether the State relies on direct
3 evidence, circumstantial evidence, or some combination of
4 the two. Now, remember what I told you about expert
5 witnesses. Normally the rules of evidence don't permit
6 witnesses to testify as to opinions or conclusions. That
7 means normally when a person testifies they only testify
8 about what they saw, heard or sensed by smell or something
9 like that. However, when someone is qualified because of
10 education or particularized skill or experience they, if
11 qualified as an expert, can give an opinion if the Court
12 qualifies them that way. And, of course, we heard -- y'all
13 heard several expert witnesses in this case, and to give
14 opinion testimony doesn't mean you have to accept the
15 opinion, but it's evidence you can see in any way you see
16 fit as you weigh all the evidence. Okay? Now, there's been
17 evidence presented that witnesses may have made prior
18 statements which are not consistent with the witnesses'
19 present testimony and testimony in court. Now, you can use
20 this evidence to decide whether or not to believe the
21 witness. You can also use evidence of earlier contradictory
22 statements to determine the truth of those statements. It's
23 up to you to decide whether to believe the earlier
24 statements made or the testimony given at trial. Now, if a
25 witness has been shown to have knowingly testified

JURY CHARGE

1 untruthfully concerning any material matter you could
2 consider this in determining the credibility of that
3 witness' testimony. Okay? Now, a person who has a past
4 criminal record is competent to testify during a trial. A
5 past criminal record does not affect the ability of a
6 witness to testify. The past record may only be considered
7 by you, ladies and gentlemen, if at all, in determining that
8 witness' believability. Remember, you're the sole judges of
9 the facts in this case and of the believability of any and
10 all of the witnesses. Now, a statement made by the
11 defendant has been admitted into evidence in this case.
12 Okay? Y'all watched it. Okay? Now, while the Court --
13 while I have determined that the statement is admissible,
14 you must determine whether the statement made by the
15 defendant was voluntary and was of his own free will. This
16 means that the statement was not caused by pressure, force,
17 fear, threats, coercion or intimidation, or by hope of a
18 promise of any leniency or reward of any kind. Now, in
19 determining whether the statement was voluntary you should
20 consider both the characteristics of the defendant and the
21 details of the questioning. Some of the factors you can
22 consider are his age, his education or lack thereof, his
23 mental ability or capacity, his IQ or intelligence, his
24 background environment, the place and length of where the
25 statement was given, the nature of the questioning, how law

JURY CHARGE

1 enforcement questioned him, the advice or lack thereof to
2 the defendant to his constitutional rights, which include
3 but are not limited the right to remain silent. That any
4 statement can be used against him in a court of law. The
5 right to have a lawyer present, that if he could not afford
6 a lawyer, a lawyer would be appointed to represent him
7 without any costs. And that he could stop making a
8 statement at anytime. See, ladies and gentlemen, you're to
9 consider all of the surrounding circumstances before you
10 give any weight to a statement made by the defendant. Now,
11 the State has the burden of proving beyond a reasonable
12 doubt that the defendant's statement was voluntary. If you
13 determine it was you can give that statement any weight and
14 consideration you think is appropriate because you're the
15 judge of the facts. If you don't find that it was free and
16 voluntary then you shouldn't consider the statement at all.
17 Now, ladies and gentlemen, I instruct you and emphasize to
18 you the fact that the defendant did not testify is not a
19 factor to be considered by you in any way in your
20 deliberations and in your consideration on the question of
21 guilt or innocence. It must not be considered by you in any
22 manner whatsoever. A defendant has the constitutional right
23 to remain silent, and the assertion of this right must not
24 be considered by you in your deliberations. So I repeat,
25 under your oath, Mr. Foreman, you are to draw no conclusions

JURY CHARGE

1 whatsoever from the fact that the defendant in this case did
2 not testify. In fact, the fact that he didn't testify
3 should not even be discussed in the jury room. Now, the
4 burden of proof, as I've always stated to you, is on the
5 State of South Carolina. The defendant is not required to
6 prove innocence. The burden of proof remains on the State
7 to prove guilt beyond a reasonable doubt, and I'm going to
8 describe -- define reasonable doubt for you here in a
9 moment, and I'm getting to the end. All right? Now, the
10 indictments in this case allege several different offenses
11 against the defendant, and the charges are criminal sexual
12 conduct with a minor first degree; criminal sexual conduct
13 with a minor second degree; and incest. Now, each
14 indictment -- again, remember, an indictment is just a piece
15 of paper by which a case comes to court, it's a description
16 of the criminal offense charged, and he's presumed innocent
17 until proven guilty. So each indictment charges a separate
18 and distinct offense. You must decide each indictment
19 separately on the evidence and the law applicable to it
20 uninfluenced by your decision as to any other indictment.
21 The defendant can be convicted or acquitted on any or all of
22 the offenses charged, so you will be asked to write a
23 separate verdict of guilt or not guilty for each indictment,
24 and I'm going to go over that, Mr. Foreman, here in a moment
25 with you when I show you the verdict form. Okay? Let's

JURY CHARGE

1 talk about intent, criminal intent. In order to establish
2 criminal liability criminal intent is required. For
3 example, the mental state required to be proven by the State
4 for a particular crime may be purpose, intent, knowledge,
5 recklessness, or criminal negligence. Criminal intent must
6 be proven by the State beyond a reasonable doubt. Criminal
7 intent is always a matter that must be determined by you,
8 the jury, from the circumstances surrounding the situation.
9 There's no way to prove intent to a mathematical certainty.
10 There's no way that medical science can dissect a person's
11 brain and determine what that person had in mind. Okay? So
12 the law says that criminal intent may be inferred from the
13 circumstances which have been shown to have existed. That's
14 how you make a determination of whether or not the element
15 requiring intent was present. Now, it's not necessary to
16 establish intent by direct and positive evidence, but intent
17 may be established by inference in the same way as any other
18 fact by taking into consideration the acts of the parties
19 and all of the facts and circumstances of the case.
20 Criminal intent is a mental state, a conscious wrongdoing.
21 It's up to you to determine what the defendant intended to
22 do based upon the circumstances which have been shown to
23 have existed. Criminal intent can arise from action or a
24 failure to act. It can arise from negligence, recklessness,
25 or an indifference to duty or to consequences that are

JURY CHARGE

1 considered by the law to be the equivalent of criminal
2 intent. Let's talk about presumption of innocent. Now, the
3 defendant has pled not guilty, and that plea puts the burden
4 on the State of South Carolina to prove the defendant
5 guilty. A person charged with committing a criminal offense
6 is never required to prove innocence. I charge you, ladies
7 and gentlemen, that it is an important rule of law that a
8 defendant in a criminal trial no matter what the seriousness
9 of the charge may be will always be presumed to be innocent
10 of the crime for which the indictment was issued unless
11 guilt has been proven by evidence satisfying you of that
12 guilt beyond a reasonable doubt. Now, this presumption of
13 innocence does not end when you begin your deliberations,
14 but it accompanies the defendant throughout your
15 deliberations until you've reached a unanimous verdict of
16 guilt based upon evidence satisfying you of that guilt
17 beyond a reasonable doubt. Just imagine if you will the
18 presumption of innocence being like a robe, just like I'm
19 wearing, a robe of righteousness placed around the shoulders
20 of the defendant which remains with him until it's been
21 stripped away from him by evidence satisfying you of his
22 guilt beyond a reasonable doubt. This presumption of
23 innocence is not just a mere legal theory, it's not just a
24 legal phrase, it's a substantial right to which every
25 defendant is entitled unless you, the jury, are satisfied

JURY CHARGE

1 from the evidence of the defendant's guilt beyond a
2 reasonable doubt. So what is a reasonable doubt? A
3 reasonable doubt is a doubt which makes an honest, sincere,
4 conscientious juror in search of the truth to hesitate to
5 act. Now, proof beyond a reasonable doubt must therefore be
6 proof of such a convincing character that a reasonable
7 person would not hesitate to rely and act upon it in the
8 most important of his or own affairs. Proof beyond a
9 reasonable doubt can also be described as proof that leaves
10 you firmly convinced of a defendant's guilt. Now, ladies
11 and gentlemen, there's very few things we know in this world
12 with absolute certainty, and in criminal cases the law does
13 not require proof that overcomes every possible doubt. If
14 based upon your consideration of the evidence you are firmly
15 convinced that the defendant is guilty, then you must find
16 him guilty. If on the other hand you think there's a real
17 possibility that he's not guilty, you must give him the
18 benefit of the doubt and find him not guilty. First degree
19 criminal sexual conduct with a minor. The defendant is
20 charged with first degree criminal sexual conduct with a
21 minor. The State must prove beyond a reasonable doubt that
22 the defendant engaged in a sexual battery with the victim.
23 A sexual battery is defined as sexual intercourse,
24 cunnilingus, fellatio, anal intercourse or any intrusion,
25 however slight, of any part of a person's body or of any

JURY CHARGE

1 object into the genital or anal openings of another person's
2 body except when the intrusion is accomplished for medically
3 recognized treatment or diagnostic purposes. The State must
4 then prove beyond a reasonable doubt that the -- if you find
5 that the State has proven beyond a reasonable doubt a sexual
6 battery, the State must then prove beyond a reasonable doubt
7 that the victim was less than 11 years old at the time of
8 the sexual battery. Now, consent, willingness, indifference
9 or ignorance on the part of a minor, if any, as to what was
10 taking place does not in any way affect the charge of
11 criminal sexual conduct with a minor, because an unmarried
12 woman under the age of 14 cannot legally consent to sexual
13 intercourse. The defendant is charged with second degree
14 criminal sexual conduct with a minor. The State must prove
15 beyond a reasonable doubt that the defendant engaged in a
16 sexual battery with the victim. I've already described for
17 you and defined for you what a sexual battery means. If the
18 State proves a sexual battery as to that victim, the State
19 must also prove beyond a reasonable doubt that the victim
20 was at least 11 years old but not more than 14 years old at
21 the time of the sexual battery. Incest. The defendant is
22 charged within incest. The State must prove beyond a
23 reasonable doubt that the defendant had sexual intercourse
24 with his daughter. Now, let me say something -- I'm about
25 to wrap it up -- about deliberations, ladies and gentlemen.

JURY CHARGE

1 The word deliberation is defined as a careful consideration
2 weighing up with a view to a decision. See, the genius of
3 our jury system and our justice system is that it allows 12
4 good people, both men and women, from differing backgrounds,
5 life experiences, perspectives, to consider the evidence,
6 talk about it, and ultimately reach a verdict. Now, the
7 task of a juror is called deliberations for a reason. You,
8 the jurors, are to consider the evidence in this case
9 carefully and deliberately. Discuss it in a calm, thorough
10 and courteous manner. Remember, you're not partisans or
11 advocates for one side over the other, or for either side
12 over the other, you're judges of the facts. Your sole duty
13 is to sort through all of this information that you've heard
14 and seen this week and to find your verdict based upon the
15 evidence presented in this courtroom. The supreme law of
16 our land, our United States Constitution, affords everyone a
17 day in court and a fair trial, so this case is very
18 important to both sides because it is their day. I charge
19 you, ladies and gentlemen, to listen to the views of your
20 fellow jurors, carefully consider their viewpoints,
21 courteously discuss the evidence. Remember, you're doing
22 something deliberately, you're not in a big hurry, and
23 you're tasked with a duty of utmost importance. Your
24 verdict cannot be based on sympathy, passion, prejudice,
25 emotion, or any other consideration which is not in evidence

JURY CHARGE

1 in this case. And in conclusion, ladies and gentlemen,
2 you've been selected by both the State and the defendant to
3 be fair and impartial jurors. It is your duty then, your
4 deliberations, to determine your verdict in this case giving
5 the defendant the benefit of every reasonable doubt on these
6 charges, and from the facts which you determine to be
7 relevant to you and have weight, you take and apply the law
8 which I've just given you, and thus use that for your -- for
9 you to reach a verdict. Now, I've told you the standards
10 you must apply to the charges in the indictments, you've
11 heard the evidence, and ladies and gentlemen, you've now
12 heard the law. Now, whatever your verdict is as to each
13 indictment, guilty or not guilty, Mr. Foreman, you'll
14 indicate it by marking the jury's decision in the respective
15 blank on the jury form. Mark only one blank. You will then
16 sign and date the verdict form. When I say mark only one
17 blank, you mark only one blank underneath each indictment.
18 Okay? I'll go over it with you in a moment. Remember that
19 although the foreman is the only juror who writes the
20 verdict, it's not his verdict alone. The verdict has to be
21 unanimous, that means all 12 of you must agree and you can't
22 write on the verdict form until all 12 of you have agreed.
23 Okay? So the verdict form is quite simple, it simply says
24 as follows: It says, "The following is a unanimous verdict
25 of the jury. Number one, as to indictment" -- and it gives

JURY CHARGE

1 you the number -- "for criminal sexual conduct with a minor
2 first degree: We, the jury, unanimously find the
3 defendant," you mark either not guilty or you mark guilty.
4 Okay? And then you do the same thing for the second charge,
5 you do the same thing for the third charge and then you'll
6 sign it and date it. Okay? Ladies and gentlemen, I'm going
7 to send you to your jury room at this time, but do not begin
8 to discuss the case until you've received the exhibits as
9 well as this verdict form, when the bailiff knocks on your
10 door and hands you that that's your signal to start talking
11 about the case and deliberate. Okay? Now, as I
12 indicated to -- and once you start your deliberations you'll
13 continue to deliberate until you've reached a verdict at
14 which time you'll let the bailiff know and we'll bring you
15 out here to receive your verdict. So what we're going to
16 do, ladies and gentlemen, I have called in lunch for you and
17 the Clerk of Court, Ms. Carpenter, has graciously paid for
18 it as well, which is always wonderful, we're going to let
19 you go get your food first and just set up in the other jury
20 room, which used to be the main jury room before covid.
21 Okay? And you go get your plate, get whatever you want to
22 eat, and then go to your jury room and then you can start
23 deliberating once you get all of the evidence and the
24 verdict form. Okay? But don't talk about it until you
25 actually get into that room behind your closed doors with

VERDICT

1 your food. Okay? Any questions? All right. Thank you
2 very much, y'all head on back to your jury room. Madam
3 Alternate, wait for me. Okay?

4 (The jury left the courtroom except for the
5 Alternate.)

6 THE COURT: Any exception to the charge from the State?

7 MS. LIVELY: No, Your Honor.

8 THE COURT: From the defense?

9 MR. FRICK: None from the defense.

10 (The alternate was dismissed.)

11 (The jurors began deliberations.)

12 (A lunch break was taken.)

13 THE COURT: All right. We have a verdict. Let's bring
14 the jury in.

15 (The jury returned to the courtroom.)

16 THE COURT: All right. Let the record reflect that all
17 members of the jury are present. Mr. Foreman, it's my
18 understanding that the jury has reached a verdict.

19 THE JUROR: Yes, sir.

20 THE COURT: Is the verdict unanimous?

21 THE JUROR: Yes, sir.

22 THE COURT: All right. Hand that to my bailiff right
23 there, please, hand the verdict form -- you can be seated.
24 Thank you, sir. Madam Clerk, you may publish the verdict.

25 THE CLERK: Your Honor, this is the State of South

VERDICT

1 Carolina versus Bradley Corlew. The following was a
2 unanimous verdict of the jury. Number one, as to indictment
3 2019-GS-12-887 for criminal sexual conduct with a minor
4 first degree, we, the jury, unanimously find the defendant
5 guilty. Number two, as to the indictment 2019-GS-12-952 for
6 criminal sexual conduct with a minor second degree, we, the
7 jury, unanimously find the defendant guilty. As to
8 indictment 2020-GS-12-974 for incest, we, the jury,
9 unanimously find the defendant guilty. Signed Lauren J.
10 Acker on September 2nd, 2021. If this is your verdict
11 please say so by the raising of your right hands. Thank
12 you.

13 THE COURT: Thank you, Madam clerk.

14 (The jury was dismissed.)

15 THE COURT: Court will be in recess while you prepare
16 the sentencing sheets. We will proceed with sentencing
17 momentarily in about ten minutes.

18 MS. LIVELY: Yes, sir, Your Honor.

19 THE COURT: Have you got stuff ready?

20 MS. LIVELY: Yes, sir.

21 THE COURT: All right. Thank you. So y'all line up
22 whatever mitigation you want to go and be ready to go for
23 sentencing.

24 (A break was taken.)

25 THE COURT: All right. Madam Solicitor, as to

SENTENCING HEARING

1 sentencing I will be glad to hear from the State. Mr.
2 Corlew, I'll ask that you approach the bench with your
3 attorneys.

4 MR. FRICK: Judge, may I be heard on post-trial motions
5 at this time?

6 THE COURT: Oh, absolutely.

7 MR. FRICK: Your Honor, at this time the defense would
8 move for a --

9 THE COURT: I apologize. I should have done that when
10 I first came in but the jury had already been discharged.

11 MR. FRICK: That's not a problem. Judge, at this time
12 the defense would request a new trial based on our pretrial
13 motions and objections throughout the trial and request that
14 the Judge grant a new trial.

15 THE COURT: Thank you, sir. That motion is denied.
16 All previous rulings are reaffirmed and you're absolutely
17 protected in the record for any appellate review. Okay?

18 MR. FRICK: Thank you, Judge.

19 THE COURT: All right. Thank you.

20 MS. LIVELY: Your Honor, if I may approach.

21 THE COURT: Yes, ma'am.

22 MS. LIVELY: I'm going to hand you back the
23 indictments, I needed those for the sentencing sheets. Does
24 the defense counsel want to sign at this time?

25 MR. FRICK: I never sign.

SENTENCING HEARING

1 MS. LIVELY: Your Honor, first of all I just wanted to
2 thank the jurors for their attentive -- for all of the
3 attention they gave to this case. This honestly in my 25
4 years of practicing law was the hardest case I've ever had
5 to try, not because of complication of necessarily the
6 evidence but more so for the facts of the case and the
7 horrendous nature of it. Your Honor, I can just tell you
8 that having these victims come and testify in front of a
9 group of strangers, in front of Your Honor, in front of
10 everybody, was no less than just heroic on their part.
11 These young girls are not victims, they're survivors, and
12 I've told them that and encouraged them to remember that,
13 that nothing that happened at the hands of this man was
14 their fault. Your Honor, this defendant is a registered sex
15 offender. He has a conviction in North Carolina for
16 statutory rape with a minor. He has continuously been in
17 relationships with women who have vulnerable children, most
18 of all with Sarah Lacy and her children. This defendant, we
19 have listened to his jail calls, has a new girlfriend who
20 has a three year old child who he has been exposed to, which
21 I learned that this morning. Your Honor, this man is a
22 predator. He deserves to be in prison for the rest of his
23 life not only for what he's done to his own daughter or what
24 he's done to Minor 2 or what he's exposed the other
25 children to, but to protect the other children in our

SENTENCING HEARING

1 community as well as throughout any community he would be
2 in. He is truly a predator and a monster, and I am very
3 thankful to the jury for their attentive -- just everything
4 they did in listening in this case. It was a very difficult
5 case for all of us to sit through and listen to. He
6 definitely had a right to a trial, he had that right and,
7 Your Honor, I completely believe the verdict speaks the
8 truth and he is where he belongs, and that will be in
9 prison. I am asking this Court to impose the maximum
10 sentence, which is life.

11 THE COURT: What is the maximum sentence for second
12 degree?

13 MS. LIVELY: Twenty years. Incest is one to ten.

14 THE COURT: All right. I read that statute wrong.

15 MS. LIVELY: And, Your Honor, because of the verdict of
16 the jury, then the other 60 indictments for sexual
17 exploitation and dissemination of pornography to minors is
18 going to be dismissed by the State. Thank you.

19 THE COURT: Mr. Frick?

20 MR. FRICK: Thank you, Your Honor. Mr. Corlew is 33
21 years of age. He is from Chester. He attended Chester High
22 School but I don't think he got any further than the ninth
23 grade. Judge, this is -- I will echo what the solicitor
24 said, this has been a difficult case. In my 20 years of
25 practicing this is one of the more difficult cases I've

SENTENCING HEARING

1 dealt with just with the subject matter of it. Mr. Corlew
2 maintains his innocence in this matter, and with some
3 mitigation on that, Judge. He understands that his children
4 were exposed to this. He understands that he is very guilty
5 of neglectful behavior in not getting them out of the
6 situation sooner. However, I do think it's important to
7 note that there are no substantiated allegations prior to
8 this, and when he left this horrible relationship there were
9 no allegations of this behavior after that, so that's what
10 makes it problematic from my end with Mr. Corlew maintaining
11 he did not do this to these children. Judge, I think
12 there's a question of knowledge or whether it happened or
13 not, but I think it's fair to say he was just in a horrible,
14 horrible relationship. It should never have happened.
15 That's really where all of the problems happened here.
16 Judge, I do want to speak on his prior record. My
17 understanding is that's the only conviction he has is that
18 prior what they call in North Carolina statutory rape.
19 Since we're now in sentencing I would like to tell you a
20 little bit of factual basis on that. He was 20, the victim
21 in the case was 15 who snuck out of her house, went to his
22 house and they attempted to have sex. So while obviously
23 she's under age and could not consent under law, it was not
24 a rape situation. It was illegal, she could not consent.
25 So I disagree with the solicitor's assessment that Mr.

SENTENCING HEARING

1 Corlew is a predator. This is a man who was working. I
2 know the solicitor read through all of this because I read
3 through all of the messages, and what didn't truly come out
4 at the trial because it just wasn't relevant for trial
5 purposes is Brad's life before 2017 when his wife passed
6 away. I can tell you reading the day to day messages
7 between those two, she had him on a good track. He was
8 doing well. He was struggling, they were struggling, she
9 was working, he didn't have a job. He got himself this CDL
10 and was finally in a good paying job. He was out on the
11 road a whole lot, and I got all of the pay stubs and the
12 statements, which says how often he was out of town and it
13 was a daily basis. He was working providing for him family,
14 I do believe he loves his children very much. This is
15 unfortunate. I do not think that this is a man who deserves
16 a life sentence. And I do want to comment on the deal that
17 the State made with Ms. Lacy. Judge, if it were a
18 circumstance where both of them were given the same deal at
19 the same time and you didn't bite on it and she took the
20 deal and he was left out in the cold, I couldn't fuss about
21 that. That's not the way this went down. As soon as my
22 client bonded out, he was made bond and bonded out, they
23 made the deal with Ms. Lacy and we were offered no such
24 opportunity. She is getting a 15 year sentence and she
25 admitted to every horrible thing she did. I think in and of

SENTENCING HEARING

1 itself that deserves some kind of mitigating circumstance as
2 far as sentencing is concerned. Judge, I would ask for what
3 mercy you can show.

4 THE COURT: Thank you, Mr. Frick. Mr. Corlew, I'll
5 extend an opportunity for you to speak to me before I
6 sentence you if you want to. You don't have to.

7 THE DEFENDANT: Yes, sir. You know, I know I messed up
8 by staying with Sarah for so long. I would have taken 25
9 years for child neglect. I wasn't pleading guilty to CSC
10 when I didn't do it. I would have taken 30 years for child
11 neglect. I was not going to prison for saying I did
12 something I didn't do. I never hurt my kids. I tried so
13 hard to get away from Sarah but I just couldn't. I asked my
14 mom for help, I asked everybody for help and nobody would
15 help me, and I just had nowhere to go. I mean, I told them
16 every time they came to me with an offer I was like, "Is it
17 for child endangerment?" And he was, "No. They want to you
18 plead guilty to CSC." And I would tell him I'm not pleading
19 guilty to something I didn't do. I'll take 30 for child
20 neglect, I'll take the 25 for child endangerment and they
21 just wouldn't do it, so that's why I came here.

22 THE COURT: All right, sir. Anything else?

23 THE DEFENDANT: No, sir, not from me.

24 THE COURT: Mr. Corlew, I'm a man of few words, or at
25 least I try to be especially in a situation like this. I

SENTENCING HEARING

1 will say three things --

2 MS. LIVELY: Your Honor, I really apologize, I know you
3 were getting ready to -- I know, I'm sorry. Ms. Minor 1
4 does want to say something.

5 THE COURT: Oh, absolutely. I'll be glad to hear from
6 her. I didn't realize she was here.

7 MS. LIVELY: And I didn't realize she wanted to say
8 anything, I do apologize.

9 THE COURT: Okay. Let's have her stand right there.

10 Minor 1 what would you like to tell me, young lady?

11 THE SPEAKER: I'm to a point where I don't care if
12 y'all believe me or not, but I have no reason to lie. I
13 love my dad and I would never make something up like that.

14 THE COURT: Thank you, young lady. God bless you.
15 You're going to be fine. Thank you for being here and doing
16 what you did. All right.

17 MS. LIVELY: That's all Your Honor, thank you.

18 THE COURT: All right. Three things I wanted to say:
19 I am dismayed. I am disgusted. The jury has spoken. On
20 indictment 2020-GS-12-974, having been found guilty of
21 incest, the sentence of the Court is that you be confined to
22 the South Carolina Department of Corrections for a term of
23 ten years. Indictment 19-GS-12-952, having been found
24 guilty of criminal sexual conduct with a minor second
25 degree, the sentence of the Court is that you be confined to

SENTENCING HEARING

1 the South Carolina Department of Corrections for a term of
2 20 years consecutive to the previous indictment. As to the
3 lead indictment in the case, 19-GS-12-887, the sentence of
4 the Court, Mr. Corlew, is that you be confined to the South
5 Carolina Department of Corrections for the term of your
6 natural life. God have mercy on your soul. Good luck to
7 you. That's consecutive.

8 (End of trial proceedings.)

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Case #: _____

Page ____ of ____

Chester County Sheriff's Office

Voluntary Statement

Statement of: Bradley Corlew Age: 31 Date: 8/29/19

Address: _____

Phone #: 803-601-9121

Phone #: _____

^{B.C} Sarah would beat my kids ^{Sarah B.C} punched my ^{Bradley B.C} in the face, hit him, ^{Sarah B.C} Sarah punched ^{Minor 1} in the face, Sarah snatched a fist full of hair out of Alaynas head, Sarah would try to get me to have sex in front of the kids, She twisted my nuts because I wouldn't let her suck me in front of the kids, She would shit and pee in the floor, She would never clean the house and always left it dirty. She would touch herself in front of the kids, walk around naked in front of the kids, Sarah Bit a chunk out of ^{Minor 1} s leg, Sarah threw her ^{Minor 2} down and beat him all over, Sarah punched in the face, Sarah hit Bailey in the face, Sarah hit Brad multiple times, Sarah threw her phone threw the tv, Sarah Broke her phone out of anger, Sarah would scream and cuss everyone out, Sarah would go in the Boys Room and beat them all over there head and Body. B.C

I have read this statement consisting of 2 page(s) and I certify that the facts contained therein are true and correct. I further certify that I have made no request for the advice or presence of a lawyer before any part of this statement, nor at anytime before it was finished did I request that this statement be stopped. I also declare that I was not told or prompted what to say in this statement. This statement was completed at 3:30 a.m/p.m on the 29 day of Aug 20 19.

Witness [Signature]Signature of Person Making Statement [Signature]

Witness _____



Chester County Sheriff's Office

Voluntary Statement
Supplemental

Bradley Cortez

Continued Statement Of:

B.C. Sarah would get on top of Minor 1
and Beat her, Sarah would sit on
top of Bradley and twist his arm
behind his Back, she would beat them
alot, she would talk dirty thru text
Roll playing about sex with the kids
and things like that, wanted to have
a baby B.C. B.C. And she would scream
and yell at me because I didn't want
to, she would yell at me because I
didn't wanna whoop the kids. B.C.

B.C.

B.C.

B.C.

B.C.

Witness



Signature of Person Making Statement

Witness

STATE OF SOUTH CAROLINA	)	
COUNTY OF _____	)	Indictment #2019-GS-12-887 et. al.
STATE OF SOUTH CAROLINA	)	
	)	
vs.	)	<u>MOTION IN LIMINE</u>
	)	FOR ADMISSION OF
Brad Corlew,	)	<i>RES GESTAE</i> EVIDENCE AND
Defendant.	)	COMMON SCHEME OR PLAN

Now comes the State with notice to the defendant, by and through counsel for defendant, William Frick, Esquire, that the State of South Carolina moves to admit testimony by and through two of the victims in this case, Minor 1 and Minor 2 of the ongoing multiple acts of abuse perpetrated upon them and their siblings by the Defendant Corlew. It will also include abuse inflicted upon them by the co-defendant, Sarah Lacy. The purpose of this testimony is to assist the jury in understanding the context of the crimes for which the Defendant Corlew is charged. “The ‘res gestae theory’ recognizes that evidence of other bad acts may be an integral part of the crime with which the defendant is charged *or* may be needed to aid the fact finder in understanding the context in which the crime occurred.” *State v. Preslar*, 613 S.E.2d 381, 385, 364 S.C. 466 (S.C. 2005). The Supreme Court further held the accepted bases for the admission of this evidence is when it is “necessary to a full presentation of the case, or is so intimately connected with and explanatory of the crime[s] charged against the defendant and is so much a part of the setting of the case and its ‘environment’ that its proof is appropriate in order to ‘complete the story of the crime on trial by proving its immediate context or the ‘res gestae’”; *State v. Adams*, 322 S.C. 114, 122, 470 S.E.2d 366 (1996).

In the recent case of *State v. Perry*, 430 S.C. 24, 842 S.E.2d 654 (S.C. 2020), the Supreme Court addressed the issue of *Lyle* evidence and did an exhaustive opinion explaining when “evidence of other distinct crimes” will fit an exception and stated the “acid test is its logical relevancy to the particular excepted purpose or purposes for which it is sought to be introduced.” *Id.* At 33, 34, citing *State v. Lyle*, 125 S.C. 406, 118 S.E. 803 (1923). The Court goes on to state “if it is logically pertinent in that it reasonably tends to prove a material fact in issue, it is not to be rejected merely because it incidentally proves the defendant guilty of another crime.” *Id.*, citing *Lyle*, 125 S.C. 416-417. The Court further explained that when evidence is being presented to show a common scheme or plan that it must be more than repetition of similar acts or similarities in the crimes themselves, that Court contends to admit this evidence the State must show the logical connection between all the crimes/bad acts and that the defendant used the same unique method or pattern when committing the crimes. *Id.* at 41, citing, *State v. McClellan*, 283 S.C. 389, 323 S.E.2d 772 (1984)(“It would be difficult to conceive of a common scheme or plan more within the plain meaning of the exception than that presented by this evidence.”) In *McClellan*, the defendant developed a particularized plan for sexually assaulting his three daughters by using Bible verses to justify his sexual assaults and explaining how the children were to “honor him” as their father and he had the role of teaching them how to

be with their future husbands. *Id* at 391. The father's plan was unique in how he approached sexually assaulting each one of his daughters and the admission of this evidence had a logical connection to whether the crime was committed and who committed it." *Id* at 323.

The State would show that even if the Court decided the similarities alone regarding the types of sexual acts inflicted upon the child victims in the Defendant Corlew case wasn't sufficient to support admissibility of the *Lyle* testimony, the testimony still clearly establishes a logical relevance to the underlying crime(s). *Perry* at 43; citing, *State v. Durant*, 430 S.C. 98, 844 S.E.2d 49 (2020) ("we [the court] relied on the fact "the method of his attack was more than just similar," it was unique, and because of its uniqueness" "reasonably tended to prove a material fact in issue."") This issue was the common scheme or plan used by the *Durant* defendant, a pastor in a church, who used his authority and religion to gain access to multiple female victims to engage in sexual intercourse with them. *Id.* at 106. Defendant Corlew isolated the children from other family members and friends and exposed them all to sexual activity daily until the sexual activity became a normal occurrence in the home. He further "normalized" the watching of pornography by the children, posing for nude photos in sexual positions, and engaging in sexually dysfunctional activities, i.e., coprophilia and urophilia.

Application of *Lyle* – *Res Gestae* – Common Scheme or Plan

The multiple forms of abuse inflicted and participated in by the Defendant Corlew cannot be extracted from the totality of the crimes committed against all the child victims in this case. The Defendant Corlew had a particular plan he followed along with his co-Defendant Lacy, and that plan was designed to normalize the sexual acts by having all the child victims present when a sexual act was occurring. The plan would then progress to having the child victims join in on the sexual activities with both Defendants. Statements by both female victims ^{Minor 1} and ^{Minor 2} detailed how the Defendants would have sex in front of them, they would have them join in by allowing penetration with use of dildos on them by the Defendants and, eventually, the penetration of both ^{Minor 1} and ^{Minor 2} by Defendant Corlew. Both Defendants successfully manipulated their children into believing this behavior was normal and had them engaged in daily sexual activities to maintain the frequency which satisfied Defendant Corlew's sexual needs while also brainwashing the children into this lifestyle of open sexuality. Based upon this particularized plan concocted by Defendant Corlew, it would be impossible to extract the individual abuse of each child and still have the story of what was the Defendant's methodology of having multiple layers of abuse with all the children being involved to make their circumstances seem normal. To limit the admission of Defendant Corlew's plan would leave the jury with no context of the environment and lifestyle established by the Defendant Corlew for his sexual gratification. Furthermore, each of the children, including the two testifying victims, were material witnesses to one another's abuse and the sexual activities occurring amongst themselves at the hands of both Defendants in their home.

The multiple victims and methodologies (common scheme or plan) of abuse also goes to the identity of Defendant Corlew as being a perpetrator of these crimes. The

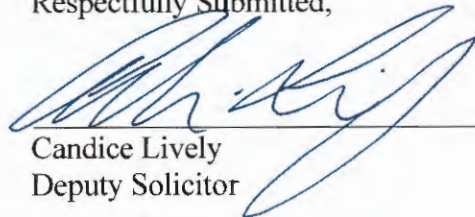
Defendant Corlew denied sexually abusing any of the children and claimed his co-Defendant Lacy was solely responsible for any and all sexual abuse. Minor 1 and Minor 2 will both testify as material witnesses to their own sexual abuse and in witnessing one another's sexual abuse. Their eyewitness testimony should be admitted to refute the material fact raised by Defendant Corlew that he was not the perpetrator of the sexual abuse. The issue of identity along with common scheme or plan when raised by the defense is another clear exception under *Lyle* which would allow for the crimes and bad acts committed by Defendant Corlew to be admitted at trial.

The State contends that this relevant evidence should be admitted against Defendant Corlew and that the probative value of this evidence far outweighs any prejudicial effect. The State will present the testimony of Minor 1 and Minor 2 as eyewitnesses to the sexual abuse they experienced at the hands of both Defendants. This evidence is probative to explain the unique common scheme or plan devised by Defendant Corlew to normalize daily sexual activities with all the children present and some actively participating when he required it.

The State contends that for a jury to understand the "lifestyle" of the Defendants and their children, they would need to hear all the bad acts and types of abuse inflicted upon these children daily. All these acts are essential to the State's case and should be admissible under the theory of *res gestae* and the *Lyle* exception of common scheme or plan. Furthermore, their probative value outweighs any prejudicial effect.

The State so moves.

Respectfully Submitted,



Candice Lively
Deputy Solicitor

Date: 8-9-2021

WITNESSES

 Sanders (CPD)

ARREST WARRANT NUMBER/DOA

 2019A1220100275 (DOA- 9/17/19)

ACTION OF GRAND JURY

TRUE BILL

Holly H. Holley

 Foreperson of Grand Jury

 Date: 12-17-19

VERDICT

 Foreperson of Petit Jury

 Date:

 DOCKET NO. 2019-GS-12-887

The State of South Carolina

 County of Chester

COURT OF GENERAL SESSIONS

 DECEMBER TERM 2019

THE STATE

vs.

BRADLEY MARK CORLEW

Indictment for
**Criminal Sexual Conduct with a Minor
First Degree**

SC Code: § 16-3-655(A)(1)

CDR Code: 0385

 Class: Felony, A (V)

STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHESTER)

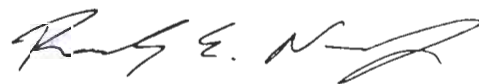
INDICTMENT

At a Court of General Sessions, convened on December 17, 2019, the Grand Jurors of Chester County present upon their oath:

CRIMINAL SEXUAL CONDUCT WITH A MINOR FIRST DEGREE

That Bradley M. Corlew did in Chester County on or about December 1, 2018, - April 21, 2019 willfully and unlawfully commit criminal sexual conduct with a minor first degree by engaging in sexual battery with a minor who was less than eleven years of age, to wit: K.L. (DOB) engaging in sexual intercourse and/or acts of sexual battery, in violation of § 16-3-655(A)(1) [formerly §16-3-655(1), *Code of Laws of South Carolina, (1976), as amended.*

Against the peace and dignity of the State, and contrary to the statute in such case made and provided.



Randy E. Newman, Jr., SOLICITOR

458

STATE OF SOUTH CAROLINA

COUNTY OF CHESTER

STATE

VS.

Bradley Mark Corlew

AKA:

Race: WHITE Sex: M Age: 33DOB: SS#Address: Ella StreetCity, State, Zip: Chester, SC 29706DL#: SID#:

IN THE COURT OF GENERAL SESSIONS

INDICTMENT/CASE#: 2019GS12887A/W#: 2019A1220100275Date of Offense: 12/1/2018S.C. Code § : 16-03-0655(1)CDR Code #: 0385

SENTENCE SHEET

*CDL Yes ☐ No ☐ CMV Yes ☐ No ☐ Hazmat Yes ☐ No ☐In disposition of the above indictment comes now the Defendant who was ☒ CONVICTED OF or ☐ PLEADSTO: Sex / Criminal sexual conduct with minor or Attempt - victim under 11 yrs of age - First degreein violation of § 16-03-0655(1) of the S.C. Code of Laws, bearing CDR Code # 0385☐ NON-VIOLENT ☒ VIOLENT ☐ SERIOUS ☒ MOST SERIOUS ☐ Mandatory GPS ☐ \$17-25-45
(CSC w/minor 1st or CSC w/minor 3rd)The charge is: ☒ As Indicted, ☐ Lesser Included Offense, ☐ Defendant Waives Presentment to Grand Jury. (def.'s initials)The plea is: ☐ Without Negotiations or Recommendation, ☐ Negotiated Sentence, ☐ Recommendation by the State.
ATTEST:Lively, Candice

SC Bar#

Defendant

Boulware, Kay
Attorney for Defendant

SC Bar#

SCB100816

WHEREFORE, the Defendant is committed to the ☒ State Department of Corrections ☐ County Detention Center,
for a determinate term of LIFE days/months/years/Time Served ☐ Youthful Offender Act not to exceed _____ years
and/or to pay a fine of \$ _____ provided that upon the service of _____ days/months/years/Time Served and or payment
of \$ _____ ; plus costs and assessments as applicable*; the balance is suspended with probation for _____
months/years and subject to South Carolina Department of Probation, Parole and Pardon Services standard conditions of
probation, which are incorporated by reference.

The sentence shall run

☐ CONCURRENT or ☒ CONSECUTIVE to sentence on: _____☐ The Defendant is to be given credit for time served pursuant to S.C. Code §24-13-40 to be calculated and applied by SCDO
_____ days/months☐ To include time spent on monitored house arrest prior to trial and sentencing.☐ The Defendant Shall be Released from County Detention Center.Pursuant to 18 U.S.C. § 922 and § 16-25-30 it is unlawful for a person convicted of a violation of § 16-25-20 or § 16-25-6
(Domestic Violence) to ship, transport, possess, or receive a firearm or ammunition.

STATE VS Bradley Mark Corlew INDICTMENT/CASE#: 2019GS12887**SPECIAL CONDITIONS:**☐ **PTUP** after _____ months/years**And Other Terms Listed Below:**

- ☐ Substance Abuse Counseling ☐ Completion of GED ☐ Random Drug/Alcohol testing
- ☐ Attend Voc. Rehab. or Job Corp ☐ No Contact with ☐ Domestic Violence Intervention Program
- ☐ Mental Health Counseling ☐ May serve W/E beginning : _____
- ☐ Sex Offender Registry pursuant to S.C. Code § 23-3-430 ☐ Public Service Employment 0 _____ days/hours
- ☐ Central Registry of Child Abuse and Neglect pursuant to S.C. Code §17-25-135.
- ☐ Other: _____

☐ **RESTITUTION:** ☐ **Deferred** ☐ **Def. Waives Hearing** ☐ **Ordered**

Total: \$ _____ plus 20% fee: _____ \$ _____

Payment Term _____ ☐ Set by SCDPPPS

Recipient: _____

***Fine:**

Fine may be pd. in equal, consecutive weekly/monthly pmts. of \$ _____ Beginning _____ \$ _____

§14-1-206 (Assessments 107.5 %)		\$
§14-1-211(A)(1) (Conv. Surcharge)	\$100	\$
§14-1-211(A)(2) (DUI Surcharge)	\$100	\$
§56-5-2995 (DUI Assessment)	\$12	\$
§56-1-286 (DUI Breath Test)	\$25	\$
§14-1-212 (Law Enforce. Funding)	\$25	\$
§14-1-213 (Drug Court Surcharge)	\$150	\$
§34-11-70(b)and(c), and 34-11-90(c)and(d) (Admin Fraud Check Court Costs)	\$41	\$
§50-21-114(BUI Breath Test Fee)	\$50	\$
§56-5-2942(J) (Vehicle Assessment)	\$40/ea	\$
3% to County (if paid in installments)	TBD	\$

☐ Appointed PD or appointed other counsel, Proviso requires \$500 be paid to Clerk during probation and shall be collected before any other fees.☐ § 17-3-30(B) Unpaid Application Fee to be paid to the Public Defender Fund**TOTAL**Clerk of Court/ Deputy Clerk: Sue H. CarpenterCourt Reporter: Mike WatkinsPresiding Judge: [Signature]Judge Code: 2108Sentence Date: 8/2/21

WITNESSES

Sanders (CPD)

DOCKET NO. 2019-GS-12-952

The State of South Carolina

County of Chester

COURT OF GENERAL SESSIONS

DECEMBER TERM 2019

ARREST WARRANT NUMBER/DOA

2019A122010037 DOA-10/01/19)

THE STATE
vs.

ACTION OF GRAND JURY

BRADLEY MARK CORLEW

TRUE BILL

Wally H Wally
Foreperson of Grand Jury
Date: 12-17-19

VERDICT

Foreperson of Petit Jury
Date:

Indictment for

Criminal Sexual Conduct with a Minor
Second Degree

SC Code: § 16-3-655(B)(1), (C)(3)
CDR Code: 0396
Class: Felony C

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHESTER)

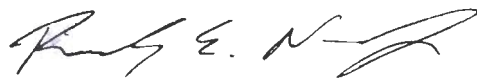
INDICTMENT

At a Court of General Sessions, convened on December 17, 2019, the Grand Jurors of Chester County present upon their oath:

CRIMINAL SEXUAL CONDUCT WITH A MINOR SECOND DEGREE

That Bradley M. Corlew did in Chester County, on or about December 1, 2018, through July 31, 2019, engage in sexual battery with S.V. (DOB), a minor 14 years of age or less but at least 11 years of age, in violation of Section 16-3-655(B)(1), (C)(3) of the Code of Laws of South Carolina.

Against the peace and dignity of the State, and contrary to the statute in such case made and provided.



Randy E. Newman, Jr., SOLICITOR

462

STATE OF SOUTH CAROLINA

COUNTY OF CHESTER

STATE

VS.

Bradley Mark Corlew

AKA:

Race: WHITE Sex: M Age: 33

DOB: SS#

Address: Ella Street

City, State, Zip: Chester, SC 29706

DL#: SID#

IN THE COURT OF GENERAL SESSIONS

INDICTMENT/CASE#: 2019GS1200952

A/W#: 2019A1220100374

Date of Offense: 12/1/2018

S.C. Code § : 16-03-0655(2)

CDR Code #: 0396

SENTENCE SHEET

*CDL Yes ☐ No ☐ CMV Yes ☐ No ☐ Hazmat Yes ☐ No ☐In disposition of the above indictment comes now the Defendant who was ☒ CONVICTED OF or ☐ PLEADS

TO: Sex / Criminal sexual conduct with minor, or Attempt - victim 11 to 14 yrs of age inclusive - Second deg.

in violation of § 16-03-0655(2) of the S.C. Code of Laws, bearing CDR Code # 0396

☐ NON-VIOLENT ☒ VIOLENT ☐ SERIOUS ☒ MOST SERIOUS ☐ Mandatory GPS ☐ \$17-25-45

(CSC w/minor 1st or CSC w/minor 3rd)

The charge is: ☒ As Indicted, ☐ Lesser Included Offense, ☐ Defendant Waives Presentment to Grand Jury. (def.'s initials)The plea is: ☐ Without Negotiations or Recommendation, ☐ Negotiated Sentence, ☐ Recommendation by the State.

ATTEST:

SCB100816

Lively, Candice

SC Bar# 12123

Defendant

Boulware, Kay
Attorney for Defendant

SC Bar#

WHEREFORE, the Defendant is committed to the ☒ State Department of Corrections ☐ County Detention Center,for a determinate term of 20 days/months/years/Time Served ☐ Youthful Offender Act not to exceed _____ years

and/or to pay a fine of \$ _____ provided that upon the service of _____ days/months/years/Time Served and or payment

of \$ _____ ; plus costs and assessments as applicable*; the balance is suspended with probation for _____

months/years and subject to South Carolina Department of Probation, Parole and Pardon Services standard conditions of probation, which are incorporated by reference.

The sentence shall run

☐ CONCURRENT or ☒ CONSECUTIVE to sentence on: 19-GS-12-887☐ The Defendant is to be given credit for time served pursuant to S.C. Code §24-13-40 to be calculated and applied by SCDO _____ days/months☐ To include time spent on monitored house arrest prior to trial and sentencing.☐ The Defendant Shall be Released from County Detention Center.

Pursuant to 18 U.S.C. § 922 and § 16-25-30 it is unlawful for a person convicted of a violation of § 16-25-20 or § 16-25-6 (Domestic Violence) to ship, transport, possess, or receive a firearm or ammunition.

STATE VS Bradley Mark Corlew INDICTMENT/CASE# 2019GS1200952

SPECIAL CONDITIONS:

☐ PTUP after _____ months/years

And Other Terms Listed Below:

- ☐ Substance Abuse Counseling ☐ Completion of GED ☐ Random Drug/Alcohol testing
- ☐ Attend Voc. Rehab or Job Corp ☐ No Contact with ☐ Domestic Violence Intervention Program
- ☐ Mental Health Counseling ☐ May serve W/E beginning : _____
- ☐ Sex Offender Registry pursuant to S.C. Code § 23-3-430 ☐ Public Service Employment 0 _____ days/hours
- ☐ Central Registry of Child Abuse and Neglect pursuant to S.C. Code §17-25-135.
- ☐ Other: _____

☐ RESTITUTION: ☐ Deferred ☐ Def. Waives Hearing ☐ Ordered

Total: \$ _____ plus 20% fee: \$ _____

Payment Term _____ | ☐ Set by SCDPPPS

Recipient: _____

*Fine:

Fine may be pd. in equal, consecutive weekly/monthly pmts. of \$ _____ Beginning _____

§14-1-206 (Assessments 107.5 %)		\$
§14-1-211(A)(1) (Conv. Surcharge)	\$100	\$
§14-1-211(A)(2) (DUI Surcharge)	\$100	\$
§56-5-2995 (DUI Assessment)	\$12	\$
§56-1-286 (DUI Breath Test)	\$25	\$
§14-1-212 (Law Enforce. Funding)	\$25	\$
§14-1-213 (Drug Court Surcharge)	\$150	\$
§34-11-70(b)and(c), and 34-11-90(c)and(d) (Admin Fraud Check Court Costs)	\$41	\$
§50-21-114(BUI Breath Test Fee)	\$50	\$
§56-5-2942(J) (Vehicle Assessment)	\$40/ea	\$
3% to County (if paid in installments)	TBD	\$

☐ Appointed PD or appointed other counsel, Proviso requires \$500 be paid to Clerk during probation and shall be collected before any other fees.

☐ § 17-3-30(B) Unpaid Application Fee to be paid to the Public Defender Fund

TOTAL \$

Clerk of Court Deputy Clerk: _____

Court Reporter: _____

Presiding Judge: _____

Judge Code: _____

Sentence Date: _____

WITNESSES

✓ Sanders (CPD)

ARREST WARRANT NUMBER/DOA

2020GS12-0974 DI

ACTION OF GRAND JURY

VERDICT

TRUE BILL

Foreperson of Petit Jury
Date:

DOCKET NO. 2020-GS-12-0974

The State of South Carolina

County of Chester

COURT OF GENERAL SESSIONS

OCTOBER TERM 2020

THE STATE
vs.

BRADLEY CORLEW

INCEST

SC Code:16-15-20
CDR Code:0090
Class:Felony Exempt

CLERK OF COURT
CHESTER CO S.C.

2020 OCT 27 PM 3:50

FILED

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHESTER)

INDICTMENT

At a Court of General Sessions, convened on OCTOBER 27, 2020, the Grand Jurors of CHESTER County present upon their oath:

INCEST

That BRADLEY CORLEW did in Chester County between on or about December 1, 2018, through July 31, 2019, being the biological father of S.V. (his female daughter under the age of 18), BRADLEY CORLEW did have carnal intercourse with ^{Minor 1} on multiple occasions, in violation of Section 16-15-20 of the *Code of Laws of South Carolina*.

Against the peace and dignity of the State, and contrary to the statute in such case made and provided.



Randy E. Newman, Jr., SOLICITOR

466

STATE OF SOUTH CAROLINA

COUNTY OF CHESTER

STATE

VS.

Bradley Mark Corlew

AKA:

Race: WHITE Sex: M Age: 33

DOB: SS#

Address: Ella Street

City, State, Zip: Chester, SC 29706

DL#: SID#

IN THE COURT OF GENERAL SESSIONS

INDICTMENT/CASE#: 2020GS1200974

A/W#: 2020GS1200974

Date of Offense: 12/1/2018

S.C. Code § : 16-15-0020

CDR Code #: 0090

SENTENCE SHEET

*CDL Yes ☐ No ☐ CMV Yes ☐ No ☐ Hazmat Yes ☐ No ☐In disposition of the above indictment comes now the Defendant who was ☒ CONVICTED OF or ☐ PLEADS

TO: Sex / Incest

in violation of § 16-15-0020 of the S.C. Code of Laws, bearing CDR Code # 0090

☒ NON-VIOLENT ☐ VIOLENT ☐ SERIOUS ☐ MOST SERIOUS ☐ Mandatory GPS ☐ §17-25-45

(CSC w/minor 1st or CSC w/minor 3rd)

The charge is: ☒ As Indicted, ☐ Lesser Included Offense, ☐ Defendant Waives Presentment to Grand Jury. (def.'s initials)The plea is: ☐ Without Negotiations or Recommendation, ☐ Negotiated Sentence, ☐ Recommendation by the State.

ATTEST:

Lively, Candice

SC Bar#

Defendant

Attorney for Defendant

SC Bar#

WHEREFORE, the Defendant is committed to the ☒ State Department of Corrections ☐ County Detention Center,for a determinate term of 10 days/months/years/Time Served ☐ Youthful Offender Act not to exceed years

and/or to pay a fine of \$ provided that upon the service of days/months/years/Time Served and or payment

of \$; plus costs and assessments as applicable*; the balance is suspended with probation for

months/years and subject to South Carolina Department of Probation, Parole and Pardon Services standard conditions of probation, which are incorporated by reference.

The sentence shall run

☐ CONCURRENT or ☒ CONSECUTIVE to sentence on: 19-GS-12-952☐ The Defendant is to be given credit for time served pursuant to S.C. Code §24-13-40 to be calculated and applied by SCDO: days/months☐ To include time spent on monitored house arrest prior to trial and sentencing.☐ The Defendant Shall be Released from County Detention Center.

Pursuant to 18 U.S.C. § 922 and § 16-25-30 it is unlawful for a person convicted of a violation of § 16-25-20 or § 16-25-6 (Domestic Violence) to ship, transport, possess, or receive a firearm or ammunition.

STATE VS

Bradley Mark Corlew

INDICTMENT/CASE#

2020GS1200974

SPECIAL CONDITIONS:☐ **PTUP** after _____ months/years**And Other Terms Listed Below:**

- ☐ Substance Abuse Counseling ☐ Completion of GED ☐ Random Drug/Alcohol testing
☐ Attend Voc. Rehab. or Job Corp ☐ No Contact with ☐ Domestic Violence Intervention Program
☐ Mental Health Counseling ☐ May serve W/E beginning _____

☐ Sex Offender Registry pursuant to S.C. Code § 23-3-430 ☐ Public Service Employment 0 _____ days/hours

☐ Central Registry of Child Abuse and Neglect pursuant to S.C. Code §17-25-135.

☐ Other: _____

☐ **RESTITUTION:** ☐ **Deferred** ☐ **Def. Waives Hearing** ☐ **Ordered**

Total: \$ _____ plus 20% fee: _____ \$ _____

Payment Term _____ ☐ Set by SCDPPPS

Recipient: _____

***Fine:**

Fine may be pd. in equal, consecutive weekly/monthly pmts. of \$ _____ Beginning _____	\$ _____
§14-1-206 (Assessments 107.5 %)	\$ _____
§14-1-211(A)(1) (Conv. Surcharge)	\$100 \$ _____
§14-1-211(A)(2) (DUI Surcharge)	\$100 \$ _____
§56-5-2995 (DUI Assessment)	\$12 \$ _____
§56-1-286 (DUI Breath Test)	\$25 \$ _____
§14-1-212 (Law Enforce. Funding)	\$25 \$ _____
§14-1-213 (Drug Court Surcharge)	\$150 \$ _____
§34-11-70(b)and(c), and 34-11-90(c)and(d) (Admin Fraud Check Court Costs)	\$41 \$ _____
§50-21-114(BUI Breath Test Fee)	\$50 \$ _____
§56-5-2942(J) (Vehicle Assessment)	\$40/ea \$ _____
3% to County (if paid in installments)	TBD \$ _____

- ☐ Appointed PD or appointed other counsel, Proviso requires \$500 be paid to Clerk during probation and shall be collected before any other fees.
☐ § 17-3-30(B) Unpaid Application Fee to be paid to the Public Defender Fund

TOTAL

\$ _____

Clerk of Court/ Deputy Clerk:

Lucy K. Carpenter
Mike Watkins

Court Reporter:

Presiding Judge:

Judge Code:

Sentence Date:

[Signature]
 2108
 9/2/21

Mar 13 2023

SC Court of Appeals

CERTIFICATE OF COUNSEL FOR APPELLANT

Counsel for appellant certifies that this Record on Appeal contains all material proposed to be included by any of the parties and not any other material and that this Record on Appeal complies to the best of my ability with the April 15, 2014 order from the South Carolina Supreme Court entitled "Revised Order Concerning Personal Identifying Information and Other Sensitive Information in Appellate Court Filings."

Respectfully Submitted,



Susan B. Hackett
Appellate Defender

South Carolina Commission on Indigent Defense
Division of Appellate Defense
PO Box 11589
Columbia, SC 29211-1589

ATTORNEY FOR APPELLANT

This 13th day of March, 2023.