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SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court Of General Sessions
The Honorable H. Steven DeBerry IV, Circuit Court Judge

Appellate Case No. 2023-000868

THE STATE, Respondent,

v.

DRISCOLL RIGGINS, JR., Appellant.

FINAL BRIEF OF RESPONDENT

ALAN WILSON
Attorney General

ANDREW D. POWELL
Assistant Attorney General

Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

JIMMY A. RICHARDSON
Solicitor, Fifteenth Judicial Circuit
P.O. Box 1688
Georgetown, SC 29442

ATTORNEYS FOR RESPONDENT

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APPELLANT'S STATEMENT OF ISSUES ON APPEAL

I. The trial court erred in ruling appellant was at fault in bringing on the confrontation with McCray by imposing a duty to retreat on appellant when despite appellant walking down a public street as the only means of travel from his place of employment following a full workday.

II. Since appellant was acting lawfully, and in a place he had a right to be, the trial court erred in failing to grant immunity under the Protection of Persons and Property Act based upon the court's finding that appellant was reasonably in fear for his life from the actions of McCray.

III. The lower court erred in admitting the written statement of a witness who could neither recall the events from the statement nor recall providing the statement to law enforcement.

COUNTERSTATEMENT OF ISSUES ON APPEAL

I. Under Davis, a grant of immunity requires the defendant to establish, by a preponderance of the evidence, he was without fault in bringing on the difficulty. Did the court err in determining Appellant was not without fault where Pyatt credibly testified Appellant shot Victim without difficulty to avenge the death of his friends was deemed credible?

II. Under Rule 613, SCRE extrinsic evidence of a prior inconsistent statement is admissible if the witness is advised of the statement, the time and place it was made, the person to whom it was made, and given the opportunity to explain or deny the statement. Did the court err in admitting evidence of Cano's prior written statement where Cano was unable to recall writing that Appellant paid her to notify him when Victim left the restaurant?

STATEMENT OF THE CASE

A Horry County Grand Jury indicted Appellant Driscoll Riggins, Jr. for murder, possession of a weapon during a violent crime, and unlawful possession of a firearm. He proceeded to a jury trial on May 15-19, 2023, before the Honorable Steven DeBerry, IV. Appellant was convicted of voluntary manslaughter and possession of a weapon during the commission of a violent crime. Appellant pleaded guilty to unlawful possession of a firearm[1]. Appellant was sentenced to twenty-five years' imprisonment for voluntary manslaughter, five years' concurrent imprisonment for possession of a weapon during the commission of a violent crime, and seven-hundred- and twenty-days' time served for unlawful possession of a firearm. This direct appeal follows.

[1] Because of this plea, immunity is irrelevant to this conviction. See State v. Sims, 423 S.C. 397, 402, 814 S.E.2d 632, 634 (Ct. App. 2018).

STANDARD OF REVIEW

The admission or exclusion of evidence is a matter addressed to the sound discretion of the trial court and its ruling will not be disturbed in the absence of a manifest abuse of discretion accompanied by probable prejudice. State v. Douglas, 369 S.C. 424, 429, 632 S.E.2d 845 (2006). "A claim of immunity under the Act requires a pretrial determination using a preponderance of the evidence standard, which [an appellate court] reviews under an abuse of discretion standard of review." State v. Jones, 416 S.C. 283, 290, 786 S.E.2d 132, 136 (2016). An "abuse of discretion" occurs when the conclusions of the trial court lack evidentiary support or are controlled by an error of law. Douglas, 369 S.C. 429, 632 S.E.2d 845.

STATEMENT OF FACTS

Appellant and Victim knew each other growing up. (R. p. 400). Appellant testified that the two grew apart over time. (R. p. 400-401). Notably, Appellant stated in 2020 two of his friends were killed in a shooting. (R. p. 401). Appellant testified he did not think Victim shot them and that Victim was not charged with the offense. (R. p. 402). Nonetheless, Appellant stated that Victim's social media indicated to him that Victim was involved. (R. p. 402). Appellant stated that more shootings ensued, resulting in Appellant being shot in the leg by Victim. (R. p. 410-411).

On the evening of May 21, 2021, Appellant was working his shift at Captain Archies in North Myrtle Beach. (R. p. 398-400). Appellant clocked in for his shift at around 3:00 PM. (R. p. 399). That evening McCray (Victim) and his girlfriend, Pyatt, went to Captain Archies to watch a basketball game. (R. p. 205). Victim and Pyatt noticed a fellow acquaintance, Sinclair, at the restaurant and sat with him for a while. (R. p. 205).

Appellant's coworkers made him aware of the fact that Victim was at the restaurant. (R. p. 416). One coworker made a statement to Detective Bellamy that Appellant offered her a hundred dollars to tell him when Victim left the restaurant.[2] (R. p. 245-246). Pyatt testified that the group discussed going to another bar, but decided they were too tired and decided to go home. (R. p. 207). McCray and his girlfriend went to the parking lot while Sinclair went in another direction. (R. p. 208). She testified that as they were walking to the vehicle a man crashed into the dumpster while driving a moped. (R. p. 209). She stated several people gathered, and that Sinclair reappeared in his vehicle. (R. p. 210). She further testified that a guy walked up and said "this is for my ni*****" and that a shooting ensued. (R. p. 212). She testified that the

[2] The coworker testified that the statement consisted of her handwriting but that she was unable to confirm her statement due to alcohol abuse. (R. p. 246).

man walked up from the direction of the restaurant. (R. p. 212). She stated that Victim went to the hospital at this time. (R. p. 214).

Sinclair testified that he left the group because he parked in a different area but drove to the dumpster when he noticed the group gathered. (R. p. 90-91). He testified that he probably got out of his vehicle for a second or so but not for a long period of time. (R. p. 92). Sinclair stated that he did not remember a commotion or anything other than Victim and his Girlfriend checking in on the man that had crashed. (R. p. 94). He stated that when he got back into his vehicle, he heard a gunshot. (R. p. 92). Sinclair testified that at this point he did not know where the shots were coming from. (R. p. 93). Victim got in the car and they went to the hospital. (R. p. 93).

Appellant testified he clocked out at around 11:40 PM and left to walk to his grandmother's house. (R. p. 419-420). Appellant stated he walked through the parking lot and stopped by the car that Victim was in. (R. p. 421). Appellant testified that they exchanged words.[3] (R. p. 424-425). Appellant further stated that he shot Victim because he thought Victim was reaching for a gun. (R. p. 424-425).

Dr. Richards testified that Victim suffered from approximately eight gunshot wounds. (R. p. 192). She described that the wounds were to Victim's head, right side of chest, back, and wrist. (R. p. 192-193). Dr. Richards concluded that the gunshot wounds caused Victim's death. (R. p. 197). Dr. Richards was able to remove the projectiles from Victim's body. (R. p. 195).

Pyatt and Sinclair met with Detective Bellamy and gave descriptions of the shooter. (R. p. 271-272). Pyatt was able to identify Appellant as the man that shot Victim. (R. p. 217). The

[3] Pyatt testified that the group did not exchange words with the man that walked up and shot Victim. (R. p. 212).

timestamped video shows Appellant left the restaurant at 11:43 PM and depicts the reaction from the incident at 11:44 PM. (State's Exhibit 7). Police subsequently arrested Appellant in Marion, SC. (R. p. 262). When arrested, Appellant was in possession of a pistol. (R. p. 311).

Paul Green, a SLED firearms examiner, testified that all of the cartridge cases he received were fired from the weapon retrieved from Appellant. (R. p. 311; 346; 363). Green also testified that he was able to match five projectiles that were fired from Appellant's gun.[4] (R. p. 363).

[4] Some of the items were not suitable for identification due to damage. (R. p. 363-364).

ARGUMENT

I. Under Davis, a grant of immunity requires the defendant to establish, by a preponderance of the evidence, he was without fault in bringing on the difficulty. Did the court err in determining Appellant was not without fault where Pyatt credibly testified Appellant shot Victim without difficulty to avenge the death of his friends was deemed credible?

The trial court properly found Appellant was not without fault in bringing on the difficulty, because Pyatt credibly testified Appellant walked up and shot Victim to avenge his friends, video evidence established the shooting occurred mere seconds after Appellant left the restaurant, and Dr. Richards testified Victim's wounds were to the back, side, head, and wrist.

Relevant Facts

After evidence was presented at trial, the court heard arguments relating to the immunity offered by S.C. Code Ann. § 16-11-420. (R. p. 477). Ultimately, the court did not grant immunity on the basis that Appellant was not without fault in bringing about the difficulty. (R. p. 490). Appellant argued that he was rightfully at work, believed he was going to be murdered, and tried to stay out of the way. (R. p. 477-478). The State argued that Appellant unlawfully was carrying a firearm, testimony from Pyatt indicated he caused the difficulty, and Sinclair's testimony did not support the idea that Victim contributed to difficulty. (R. p. 482-483). The court found Appellant was not without fault in bringing about the difficulty because Appellant left the restaurant shortly after Victim, the witnesses were credible, and video evidence corroborated testimony that showed Appellant leaving the restaurant. (R. p. 490).

Discussion

Under S.C. Code Ann. § 16-11-440 (hereafter "Act"), any law-abiding person who uses deadly force in a manner permitted by the provisions of the Act is immune from criminal prosecution for the use of deadly force. S.C. Code Ann. § 16-11-450(A); see S.C. Code Ann. §

16-11-420(B) ("[I]t is proper for law-abiding citizens to protect themselves, their families, and others from intruders and attackers without fear of prosecution ... for acting in defense of themselves and others."). In carrying out that intention, the legislature instructed:

> A person is presumed to have a reasonable fear of imminent peril of death or great bodily injury to himself or another person when using deadly force that is intended or likely to cause death or great bodily injury to another person if the person:
>
> (1) against whom the deadly force is used is in the process of unlawfully and forcefully entering, or has unlawfully or forcibly entered a dwelling, residence, or occupied vehicle, or if he removes or is attempting to remove another person against his will from the dwelling, residence, or occupied vehicle; and
>
> (2) who uses deadly force knows or has reason to believe that an unlawful and forcible entry or unlawful and forcible act is occurring or has occurred.

S.C. Code Ann. § 16-11-440(C). Additionally, the legislature further instructed:

> A person who is not engaged in an unlawful activity and who is attacked in another place where he has a right to be, including, but not limited to, his place of business, has no duty to retreat and has the right to stand his ground and meet force with force, including deadly force, if he reasonably believes it is necessary to prevent death or great bodily injury to himself or another person or to prevent the commission of a violent crime as defined in Section 16-1-60.

S.C. Code Ann. § 16-11-440(C).

Pursuant to the Act, the burden is on the defendant to establish his entitlement to immunity. State v. Andrews, 427 S.C. 178, 181, 830 S.E.2d 12, 13 (2019). To meet the burden in establishing entitlement to the immunity the defendant must prove all necessary elements of self-defense by a preponderance of the evidence. State v. Glenn, 429 S.C. 108, 118, 838 S.E.2d 491, 496 (2019). If so, the defendant would be entitled to a grant of immunity. Id. at 117-118, 838 S.E.2d at 496; see State v. Scott, 424 S.C. 463, 473, 819 S.E.2d 116, 120-121 (2018) ("Self-

defense is the classic provision of law that justifies the use of deadly force. It was clearly the Legislature's intent that if a person seeking immunity under subsection 16-11-450(A) could prove the elements of self-defense in an immunity proceeding, immunity must be granted.").

Regarding self-defense, the following four elements must be present in order for that particular defense to be established in South Carolina:

> *First, the defendant must be without fault in bringing on the difficulty.* Second, the defendant must have actually believed he was in imminent danger of losing his life or sustaining serious bodily injury, or he actually was in such imminent danger. Third, if his defense is based upon his belief of imminent danger, a reasonably prudent man of ordinary firmness and courage would have entertained the same belief. If the defendant actually was in imminent danger, the circumstances were such as would warrant a man of ordinary prudence, firmness and courage to strike the fatal blow in order to save himself from serious bodily harm or losing his own life. Fourth, the defendant had no other probable means of avoiding the danger of losing his own life or sustaining serious bodily injury than to act as he did in this particular instance.

State v. Davis, 282 S.C. 45, 317 S.E.2d 452 (1984) (emphasis added).

As entrenched in the elements, self-defense is "based upon necessity[.]" State v. Osborne, 202 S.C. 473, 25 S.E.2d 561, 563 (1943). Correspondingly, a person may not employ deadly force unless there is a reasonable necessity to kill. State v. Harvey, 110 S.C. 274, 96 S.E. 399, 400 (1918). And, significantly, if even one of the requisite element is lacking, "[i]t is an axiomatic principle of law that the defense has not been established[.]" State v. Bixby, 388 S.C. 528, 554, 698 S.E.2d 572, 586 (2010).

Our Supreme Court found intentionally bringing a loaded unlawfully possessed pistol to a drug transaction contributed to bringing on difficulty and thus barred an individual from asserting self-defense. State v. Williams, 427 S.C. 246, 830 S.E.2d 904 (2019). The Court noted defendant's pistol "was not simply a convenience for him so he could protect himself just in case

violence arose". Williams, 427 S.C. 251, 830 S.E.2d 907. The Williams Court reasoned that the defendant illegally armed himself before he entered a situation that he understood to be unlawful and likely violent. Williams, 427 S.C. 254, 830 S.E.2d 908.

Similarly, in Slater, our Supreme Court found defendant's approaching an altercation that was already underway with a loaded gun supported the trial courts finding that defendant was not entitled to a self-defense charge. State v. Slater, 373 S.C. 66, 71, 644 S.E.2d 50, 53 (2007).

Appellant could not have been without fault for the difficulty as a matter of law because he readily contributed to and provoked the confrontation with Victim that led to the supposed need to use deadly force. Pyatt testified that Appellant walked up to Victim as he was standing in a parking lot and shot him without confrontation. (R. p. 209-212). Sinclair testified he did not remember a commotion or anything other than Victim checking in on the man that crashed. (R. p. 421). Video evidence shows the shooting occurred mere seconds after Appellant left the restaurant.[5] See State v. Bryant, 336 S.C. 340, 345, 520 S.E.2d 319, 322 (1999) ("Any act of the accused in violation of law and reasonably calculated to produce the occasion amounts to bringing on the difficulty and bars his right to assert self-defense as a justification or excuse for a homicide."); see also State v. Council, 129 S.C. 116, 123 S.E. 788, 789 (1924) ("A man may deprive himself of the right of self–defense by words as well as by acts[.]"); Howard v. United States, 656 A.2d 1106, 1111 (D.C. 1995) ("a defendant is not entitled to a self-defense instruction if he deliberately places himself in a position where he has reason to believe his presence would ... provoke trouble."). And, since Appellant did not establish self-defense's without fault element, he was not entitled to immunity. cf. Bryant, 336 S.C. 340, 345-346, 520

[5] The timestamped video shows Appellant left the restaurant at 11:43 PM and depicts the reaction from the incident at 11:44 PM.

S.E.2d 319, 322 (1999) ("[Bryant]'s statements fail to establish the elements of self-defense entitling [Bryant] to a self-defense charge. . . . Accordingly, [Bryant] was not entitled to a self-defense charge and the trial judge correctly refused the charge.").

Appellant failed to establish that he was without fault in bringing about the difficulty, because he, by his own admission, deliberately placed himself with a weapon in a place where his presence would provoke trouble. Further, the court found the testimony of Pyatt and Sinclair to be credible. (R. p. 490). Because the testimony of Pyatt and Sinclair clearly supports a finding that Appellant contributed to the difficulty the court's finding should not be reversed. See State v. Johnson, 413 S.C. 458, 467, 776 S.E.2d 367, 371 (2015) ("Credibility findings are treated as factual findings, and therefore, the appellate inquiry is limited to reviewing whether the trial court's factual findings are supported by any evidence in the record."). Appellant has failed to meet his burden in establishing he was without fault.[6] This Court should affirm.

[6] If the court erred in finding Appellant contributed to bringing on the difficulty, a remand is proper to analyze the remaining elements. See State v. McCarty, 437 S.C. 355, 360, 878 S.E.2d 902, 905 (2022) ("[w]e emphasize that a circuit court, as the designated fact-finder in this matter, must provide adequate findings to support its decision so an appellate court can perform its role of reviewing the ruling under an abuse of discretion standard.").

II. Under Rule 613, SCRE extrinsic evidence of a prior inconsistent statement is admissible if the witness is advised of the statement, the time and place it was made, the person to whom it was made, and given the opportunity to explain or deny the statement. Did the court err in admitting evidence of Cano's prior written statement where Cano was unable to recall writing that Appellant paid her to notify him when Victim left the restaurant?

Cano's statements were properly admitted as evidence of a prior inconsistent statement because she was advised that the statements were made on the day after the shooting at the police station, that the statement was made to Detective Bellamy, was unable to recall the substance of the statement, and was able to authenticate the statement as her own.

Relevant Facts

Cano was working with Appellant at the restaurant on the night of the shooting. (R. p. 243). She testified that she went to the police station and gave a statement to Detective Bellamy on the day after the incident at around 1:25 PM. (R. p. 244-245; 254). When asked whether she remembered telling Detective Bellamy that Appellant gave her a hundred dollars to tell him when Victim left, Cano stated she did not remember. (R. p. 245-246). Cano explained that due to alcohol abuse she could not remember what she told Detective Bellamy. (R. p. 246). Nonetheless she testified "I know I wrote that statement, and it is my handwriting." (R. p. 246). Before offering the statement into evidence, Cano examined the document and confirmed her handwriting and that she wrote the statement for Detective Bellamy on May 22. (R. p. 247). Detective Bellamy confirmed he arranged an interview and that Cano gave a written statement. (R. p. 297).

Appellant first objected to the line of questioning as leading. (R. p. 245). The State responded by explaining "I'm impeaching her with a prior statement." (R. p. 245). Appellant objected to the admission of this statement arguing Cano did not remember its truthfulness, that it was not corroborated, and that it could have been coerced. (R. p. 249-250). The State argued

Cano testified she wrote the statement and that it was truthful at the time written. (R. p. 250). The court admitted the document on the basis that Cano authenticated it as her handwriting. (R. p. 250). During the examination of Detective Bellamy, Appellant objected stating "I object. Renewing my objection to the statement as Ms. Cano already stated that she doesn't know if she wrote that." (R. p. 297). The court overruled this objection. (R. p. 297).

First, Appellant's issue is not preserved. In order for an issue to properly be preserved for appellate review, the issue must be: (1) raised to and ruled upon by the trial court; (2) raised by the appellant; (3) raised in a timely manner; and (4) raised to the trial court with sufficient specificity. State v. Rogers, 361 S.C. 178, 183, 603 S.E.2d 910, 912-913 (Ct. App. 2004). An argument not raised and ruled on by the trial court is not preserved for appeal. State v. Nichols, 325 S.C. 111, 120, 481 S.E.2d 118, 123 (1997) (objection must be entered on a specific ground at trial to preserve an appeal); Humbert v. State, 345 S.C. 332, 548 S.E.2d 862 (2001).

Here, Appellant's objections did not specify hearsay to sufficiently bring attention to the relevant issue. Cano's ability to determine the statement's truthfulness is immaterial in determining whether the statement qualifies as a recorded recollection. Cf. State v. Byers, 392 S.C. 438, 446, 710 S.E.2d 55, 59 (2011) ("An objection should be addressed to the trial court in a sufficiently specific manner that brings attention to the exact error.").

Here, the statement's admission was not supported by Rule 803(5) but rather supported by Rule 613(b). Cano's statement to Officer Bellamy is admissible as a prior inconsistent statement. Extrinsic evidence of a prior inconsistent statement is admissible if the witness is advised of the substance, time and place of the statement and either denies making the statement, states she does not fully recall, or does not unequivocally admit he made the statement. State v.

Blalock, 357 S.C. 74, 591 S.E.2d 632 (Ct. App. 2003); State v. Bottoms, 260 S.C. 187, 195 S.E.2d 116 (1973).

In State v. Miller our Supreme Court found no error in the admission of extrinsic impeachment evidence where a witness was unable to recall his previous statement. State v. Miller, 262 S.C. 369, 204 S.E.2d 738 (1974). In Miller, the co-defendant was called as a witness and asked whether he remembered making a statement to law enforcement. Miller, 262 S.C. 371, 204 S.E.2d 738-9. The co-defendant responded, "I don't remember." Id. The Miller Court found that the co-defendant's prior written statement was admissible to impeach his testimony.

Prior inconsistent statements can be used as substantive evidence as well as for impeachment purposes if the declarant testifies and is subject to cross-examination. State v. Copeland, 278 S.C. 572, 300 S.E.2d 63 (1982).

Here, Cano was made aware of her prior statement and was unable to fully recall what she told police. Cano's testimony that she did not recall her prior statement, like the codefendant in Miller, was not an unequivocal admission. See Blalock, 357 S.C. 74, 80, 591 S.E.2d 632, 636 (Ct. App. 2003) ("Generally, where the witness has responded with anything less than an unequivocal admission, trial courts have been granted wide latitude to allow extrinsic evidence proving the statement."). Her statement was properly admitted as both impeachment and substantive evidence. Her inability to recall the statements does not inhibit the admission of extrinsic evidence.

Regardless, any error in the admission of this statement is harmless. See State v. Haselden, 353 S.C. 190, 196–97, 577 S.E.2d 445, 448–49 (2003) (finding an admission of improper evidence is harmless when the evidence is merely cumulative to other evidence). Here, Cano's statement was offered for the purpose of showing Appellant's interest in knowing the

whereabouts of Victim. Appellant's animosity and interest in Victim were also demonstrated by other testimony relating to the deterioration of the relationship, video evidence that established Appellant left shortly after Victim left the restaurant, and testimony from Pyatt that Appellant killed Victim to avenge his friend's death.

Further, the State produced sufficient evidence to support a conviction. The State elicited testimony from Pyatt who stated the shooter announced "this is for my ni****'s" right before Victim was shot.[7] (R. p. 212). Ballistic evidence established the weapon found on Appellant was used at the scene. (R. p. 363). Appellant's testimony placed himself at the scene and established him as the shooter. (R. p. 424-425). Video evidence shows Appellant leaving the restaurant and the reaction to the shooting shortly thereafter. Lastly, Dr. Richard's testimony shows Victim's wounds were to his head, back, wrist, and side. (R. p. 192-193). Under such circumstances, the error in admission of this statement is harmless. This Court should affirm.

[7] Appellant stated that in 2020 two of his friends were killed in a shooting. (R. p. 401).

CONCLUSION

For all the foregoing reasons, it is respectfully submitted that the judgment and conviction of the lower court be affirmed.

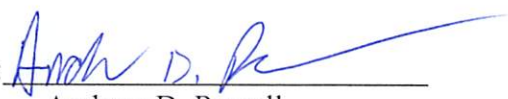
Respectfully submitted,

ALAN WILSON
Attorney General

ANDREW D. POWELL
Assistant Attorney General

JIMMY A. RICHARDSON
Solicitor, Fifteenth Judicial Circuit

P.O. Box 1688
Georgetown, SC 29442

BY: 
Andrew D. Powell
Bar # 106415

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

ATTORNEYS FOR RESPONDENT

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THE STATE, Respondent,

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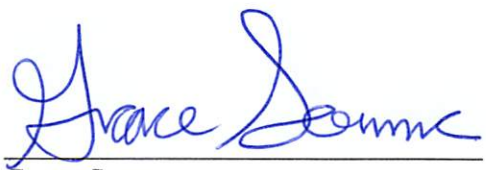
DRISCOLL RIGGINS, JR., Appellant.

PROOF OF SERVICE

I, Grace Sommer, certify that I have served the within Final Brief of Respondent on Gary Johnson, II, Esquire, counsel of record for the Appellant, by electronic mail to the address listed for counsel in AIS.

I further certify that all parties required by Rule to be served have been served.

This 6th day of August, 2024.



Grace Sommer
Legal Assistant

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

Grace Sommer

From: Grace Sommer
Sent: Tuesday, August 6, 2024 2:47 PM
To: Johnson, Gary
Cc: Warren, Kaylynn; Andrew Powell
Subject: The State v. Driscoll Riggins, Jr. (2023-000868)
Attachments: RIGGINS Driscoll - FBOR (03658130xD2C78).PDF

Good Afternoon Mr. Johnson,

Attached please find a Final Brief of Respondent in The State v. Driscoll Riggins, Jr. (2023-000868). This Brief will be filed today with the Court of Appeals via the AIS OneDrive System.

If you will, please confirm receipt of this email.

Thank you!

Grace Sommer, Legal Assistant
South Carolina Attorney General's Office
Criminal Appeals | Office 803-734-3835 | gracesommer@scag.gov
P.O. Box 11549 | Columbia, SC 29211
scag.gov