IN THE SUPREME COURT
STATE OF SOUTH CAROLINA

Appellate case no.
2024-001144

INDEX OF APPENDIX'S: WITH EXHIBIT'S IN SUPPORT OF THE EXPLANATION TO THE LOWER COURT'S ORDER OF DISMISSAL WILL BE LABELED AS THE COURT'S RECORD LABELED IT

(1) Exhibit # 1 Dr. Bennett's expert opinion

(2) Exhibit # 2 confession letter with initinal statement

(3) Exhibit # 3 State's witness Clemeticia Thomason affidavit dated September 24, 2019

(4) Exhibit # 4 Affidavit dated August 24, 2010

(5) Exhibit # 5 Affidavit of Petitioner

(6) Exhibit # 6 Rule 60 / Rule 29 motions

(7) Exhibit # 7 Letters to/from the Clerk of Court

(8) Exhibit # 8 Motion to Compel

(9) Exhibit # 9 Sled DNA TESTING

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11) Exhibit #11 Motion to Dismiss

12) Exhibit #12 Trial Transcript pages/Greenville News Document

13) Exhibit #13 SCDC form 19-11 REQUEST TO STAFF MEMBER

14) Exhibit #14 Direct Appeal of co- defendant King

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IN THE SUPREME COURT
STATE OF SOUTH CAROLINA

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SC SUPREME COURT

Patrick B. Walker, Petitioner	)	Explanation pursant to S.C.A.C.R. 243(c)
v.	)	Appellate case no. 2024-001144
State of South Carolina, Respondent	)	

Now into the Court comes the Applicant who respectifully represents the following:

SUMMARY OF CASE

The Applicant's first PCR 2006-CP-23-3331 was filed May 22, 2006 and denied on March 19, 2007. Subsequent to the denial of his first PCR Applicant discovered and obtained additional evidense as defined under the PCR statutes and case law. Applicant claims are based on the discovery of evidence, individually and cumulatively, such that the doctrine of equitable tolling should be applied to each to make his filing of the present action timely.

At trial there was testimony about a "confession letter" the alleged was written by Applicant. In 2010 Applicant obtained an opinion letter dated March 25, 2010 from handwriting expert Dr. Robert Bennett, Ph.D., R.Ph. In reviewing the "cofession letter" and known handwriting samples of applicant, Dr. Bennett noted significant differences that led Bennett to conclude: "The differences strongly indicate the evidence letter was not written by Patrick Walker." Shortly after discovering Dr. Bennett's opinion letter applicant discovered an affidavit of the states wittness "Clemeticia Thomason" dated August 24, 2010. Thomason indicated that although she had received the "confession letter" in the mail and given it to Investigator Silvaggio, she told Inv.

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Silvaggio that Walker could not have mailed that letter from jail Then in 2019 Applicant discovered an affidavit by Thomason admitting that she had forged the "confession letter" given it to Inv. Silvaggio because she was mad at Walker for not taking responsibility for their child.

APPLICANT'S DILIGENT ATTEMPS TO RAISE ISSUE OF NEWLY DISCOVERED EVIDENCE AND OBTAIN AN EVIDENTIARY HEARING THROUGH A SERIES OF PRO SE FILINGS

Pursant to S.C.A.C.R. Rule 221 The presentation of facts provided by the state to the court are clearly erronous, and does not reflect applicant's claims thru direct testimony nor exhibits provided to the court in support of testimony on the record Jan. 17, 2024. Applicant now invokes rule 201 S.C.R. of Evidence.

The amended order of dismissal simply states that a rule 60(b) motion,was filed on March 23, 2011. The order doesn't give any finding of fact to the Rule 60(b) All"Independent Action," Fraud Upon The Court, further no time limits apply. Applicant's testimony and Exhibit#6 at trial show that Applicant timely raised the newly discovered evidence issue based on the affidavit of the states wittness Clemticia Thomason Exhibit #4 dated August 24, 2010 supported by Dr. Bennett's March 25, 2010 opinion letter, Exhibit 1. To the extent March 23, 2011 Motion to Vacate or Set Aside Judgement and Order New Trial constitutes timely action. Pursant to S.C. Code Ann. § 17-27-45 (C); Pearson v. Harrison (C.A.4 (S.C.) 2001) 9 Fed. Aoox. 85, 2001 WL 427033; 17-27-80 Bannister v. State (S.C. 1998) 333 S.C. 298, 509 S.E. 2d. 807 Leamon v. State (2005) 363 S.C. 432,611 S.E. 2d. 494; F.R.C.P. 43 (e) Jones v. Bush 122 F. Supp. 2d. 713,715 (N.D. Tex. 2000. S.C.R. of Evidence Rule 201, U.S. v. Doe 4th cir 962 F.3d 139 (2020).

There has been no action taken by the State on Applicant's Rule 60. This was error as Applicant was entiled to have the circuit court interpret his Rule 60 motion based on newly discovered evidence as a post-conviction relief action. Hendricks v. State 387 S.C. 22#, 692 S.E. 2d 892 (2010). If Applicant's pro se motion had been properly construed as a second PCR action alleging newly discovered evidence, Applicant would have been entitled to appointment of counsel. McCray v. State, 2012-MO-008 (S.C.Apr. 11, 2012) S.C.R.C.P.Rule 71.1(d)

SUCCESSIVE

The lower Court held the application is impermissibly successive and Applicant's claims regarding expert testimony and recantation haven't been supported by evidence or testimony as to demonstrate why these claims were not raised in Applicant's first PCR action.

Holding Applicant has failed to present any reason why he could not have raised the current allegations in his previous post-conviction relief applications. In Aice v. State:"the court explain that every PCR applicant is entitled to a full adjudication on the merits"of the PCR which include the right to perfect a full appeal to the denial of PCR. There are two exception to a second or successive PCR, first S.C. Code Ann. 17-27-45(A) & 17-27-45(C) This exception is commonly known as "The Discovery Rule" Coats v. State,575 S.E. 2d.557 (S.C.2003); Odom v. State 523 S.E. 2d. 753, 755 (S.C.1999); C.F. Franklin v. Maynard; 558 S.E. 2d. 604, 606 N7 (S.C. 2003) per curim.

The Courts reasoning for its ruling is difficult to understand given that the newly discovered evidence was not discovered or asertained until 2010.

The fact critical to the present application and argument on timeliness and equitable tolling is that Applicant was never appointed counsel in the 2012 PCR or on any of his subsequent filings despite his due process right to counsel prusant to McCray v. State, 2012-MO-008 (S.C. Apr 11, 2012); Rule 71.1(d) S.C.R.C.P.

Applicant directs the Court's attention to testimony on the record, applicant stated with clarity the basis for filing his Rule 60(b)"Independent Action" Fraud Upon the Court! SEE: Exhibit # 4 affidavit of states wittness demonstrating the states knowledge and intent. SEE: Also Exhibit # 1 Dr. Bennett's opinion letter; Exhibit #2 alleged confession. Applicant through direct testimony notified the Court that the alleged confession letter was only the vehicle, and not the base for the claim of fraud "extrinsic". The State tried to deflect and misrepersent applicant's claim at the hearing. The Court's amended order has overlooked the facts provided to the Court through exhibits and direct testimony. F.R.C.P. 43(e) Jones v. Bush, 122 F. Supp.2d.713, 715(N.D. Tex. 2000); in Fiske v. Buder 125 F2d. 841; Robertson v. State (S.C. 2016) 418 S.C. 505, 795 S.E. 2d. 29

Applicant applied due diligents to seek his right to be heard on his March 23, 2011 Rule 60(b) "Independent Action" newly discovered claim refer to the record, entitled "Letter's to the Clerk of Court". Where the clerk, informed applicant they are just a filing office and does not set the docket."Please note any further action on the matter will come from the Solicitor's Office." Applicant amended the Rule 60(b) on 6/2/11. Later filing a 29(b) on March 28, 2012, this action does not appear in the judicial website records. The judicial website does not show any record of filing the Motion to Set Aside or Vacate.

However applicant provided a clocked copy of the motion to the Court. Shortly after filing the Motion to Set Aside and Vacate, Applicant filed a second PCR raising essentially the same issue newly discovered filed on March 23, 2011. In fact all filings by applicant pro se were an attempt to excersize due diligence. Not an attempt to mislead the Court, had the Circuit Court properly construed applicant's pro se Rule 60 motion allegeing newly discovered evidence, dated March 23, 2011 which constitute timely Pursant to S.C. Code Ann. 17-27-45(c). Given the new evidence "fraud" was not discovered until August 24, 2010. Wall v. Rasnick U.S. Court of App. 7/25/22 42 F.4th 214; Griffin v. Davis Dec. 11 2023 F.Supp.3d; Hohn v. US,262 F3d 811 (8th Cir. 2001). Counsel should have been appointed pursant to McCray V. State, 2012-MO-00 8(S.C. Apr 11,2012); rule 71.1 (d).

Motion to Compel a Ruling

The Court's amended order found Applicant fail to provide any evidence in support of his claim's. S.C. Code Ann. 17-27-80 Marlar v. State (S.C. App. 2007)373 S.C. 275, 644 S.E. 2d. 769 On September 12, 2012, Applicant specifically moved to have the circuit court make a ruling on his Rule 60 Motion filed on March 23, 2011, and amended on June 23, 2011. Applicant clearly stated he was seeking action on the March 23, 2011 newly discovered evid ence claim and that March 23, 2011 motion should be considered As the present and pending post-conviction relief action citing Hendricks v. State, 387 S.C. 221,692S.E.2d. 892 (S.C.2010). All subsequent pro se filings applicant's intention was to join the newly discovered evidence filed in the Rule 60, a clear reading of the Motion to Compel will demonstrate that fact. The Court's find ing is error.

finally a successive aplication may be permitted where the Court' refusal to hear the merits of the claim would constitute a gross miscarriage of justice. Aice v. State; 409 S.E.2d at 394 or where goverment interference, or the reasonabilable unavailability of the factual basis of the claim impeded counsel's ability to raise the claim , or where some other circumstance beyond applicant's control. SEE: McClesly v. Zant; 499 U.S.467,468 (1991). S.C. Code Ann. 17-27-90; Hilton v. State (S.C.2018)422 S.C. 204,S.E.2d 852; Whitehead v. State (1992)426 S.E. 2d. 315.

Application for Forensic DNA Testing (September 25, 2017)

Among other allegations this filing again raised the failure of the circuit court to recognize Applicant's prior Rule 60 and Rule 29 motions based on newly discovered evidence.

Motion to Dismiss (posted by prison mail room on February 22,2019

Applicant sought relief based on the State's failure to respond to his March 23, 2011 Rule 60 and Rule 29 motions based on newly discovered evidence. Applicant specifically alleged The State has with malice declined to address any motion filed pro se by petitioner."

Untimely

The lower Court ruled the present application is untimely pursant to S.C. Code Ann. 17-27-45 (A)&(C) is in error as the Court has misconstrued the facts, alleging the state's witness Clemeticia Thomason affidavit confessing to the forged confession is dated August 24, 2010. Instead this document demonstrate the state's knowledge and intent to comitt fraud. SEE:Exhibit #4 dated Aug. 24, 2010; SEE: Exhibit # 6 filed on March 23, 2011; Hazel Atlas Glass Co. v. Hartford Empire Co. 322 U.S. 238,88 L.E.D. 1250, 64 S. Ct. 997 (1944); Workman v. Bell 227,F.3d.331(6th 2000) "The failure to correct false evidence is as reprehensible as its

presentation," Riddle v. Ozmint 631 S.E.2d. 70(2006); Giglio v. U.S. 405 U.S. 150,92 S.Ct. 763,31 L.E.2d. 104(1972) SEE: Title 18 1622 "perjury" note 41 "New Trial"; Huges v. State (S.C.2011)346, S.C. 554 552 S.E. 2d 315; SEE: CJS Fed. Civ. P. 1260 fraud, perjury, misrepresentation or other misconduct.

The Court also held applicant's second PCR application was filed in 2012. Under subsection § 17-27-45(C). Holding applicant was indeed untimely prior to the filing of his second PCR application let alone his third. The court fail to consider the Rule 60(b) "Indepent Action" filed March 23, 2011 alleging newly discovered evidence pro se. There is no time limit for a claim of Fraud Upon the Court; Also the circuit court fail to construe applicant's Pro Se Rule 60(b) Independent Action as a second PCR. Hendricks v State,387 S.C.221,692S.E.2d 892(S.C.2010). The Court futher error holding there is no right to counsel in successive PCR applications. The Supreme Court held "that when the state moves for dismissal under section 17-27-45(A) and the PCR applicant raises an issue of material fact regarding the applicability of the one-year limitation, counsel should be appointed under Rule 71.1(d), SCRCP."McCray v. State, 2012-MO-008(S.C. Apr 11,2012).

Recantations Issue

THe Court find applicant has abandoned this claim. Stating Applicant did not reassert this claim in the amended Application filed December 5, 2022.Holding Applicant has not demonstrated that his claim is timely as undiscoverable until within one-year of the filing of his thrid PCR application, pursant to S.C. Code Ann.§ 17-27-45(C). In the first instance applicant's claim has never been that the co-defendant recanted this was a typographical error in the application dated April 5, 2022. The Court received direct testimony regarding this error, and were put on notice

To the proper claim is the state's witness "Clemeticia Thomason" that recanted SEE: Exhibit #3;#4; initial statement date 10/17/02 **ADDITIONAL "NEWLY DISCOVERED EVIDENCE" Affidavit of Clemeticia Thomason dated 092419**

Equitable Tolling

THE PRESENT PCR 2022-CP-23-01759

The Court's ruling this action is untimely, and applicant has not presented any evidence to why equitable tolling should apply is error. The Court fail to consider the facts,applicant provided to the Court in direct testimony. Applicant's family hired counsel William "Bill" Yarobourgh to file the action in 2019 counsel was provided an affidavit from Clemeticia Thomason "state's witness" dated September 24, 2019. Counsel was fired in March 2022 for his failure to file the present action timely. At the time former counsel filed the initial application on April 5, 2022 he was no longer on retainer to represent applicant; Harris v. U.S. RR Retirement BD 198 F3d. 139 (4th 1999); Generally held a blameless party can't be disadvantaged by procedural errors or neglect by his attorney; Spence v. Wingate 395 S.C. 148/ S.C.Supreme Ct. relationship may be breached even though the formal representation has ended; SEE: Jurprudence § 676 Its the attorney's duty and responsibility to present his clients claim to the court for adjucation. SEE: Exhibit #3; #4; initial statement dated 10/17/02 Also the circuit court's failure to construe applicant's Rule 60 filed March 23, 2011 alleging newly discovered as a second PCR HENDRICKS V. State, 387 S.C. 221, 692 S.E.2d 892 (S.C. 2010) The state's action or inactions to deny or impede ones right to be heard SEE: letters to the clerk; SEE:MOTION TO COMPEL; S.C. Code Ann. 17-27-90

To deny or impede ones right to be heard denies access to the co;urt's for review and amount's to a gross miscarriage of justice, so much so, that the state's corrective process may result in frustration of applicant's rights and render the process ineffective. SEE:Tarpley v. Allen County, Indiana 312 F.3d.895(7th cir 2007); Rand v. Rowland; 154 F. 3d. 952(9 cir 1998).
Applicant has presented procedural abnormalities, as well as circumstances beyond his control. Hilton v. State (S.C. 2018) 422 S.C. 204, S.E. 2d. 852; Whitehead v. State (1992) 426 S.E.2d 315
***To receive benefit of equitable tolling 1) party acted with due diligence in pursuit of his rights, 2) some extraordinary circumstance stood in his way!** S.C. Supreme Ct. Hooper 687 S.E.2d at 33
Plus the fact that applicant raised an issue of material fact regarding the applicability of the one-year limitation, counsel should be appointed under Rule 71.1(d), SCRCP."McCray v. State, 2012-MO-008(S.C.Apr 11,2012). Moss v. State(S.C.2017)420 S.C. 500 803 S.E.2d. 718. Further the initial application was filed by attorney Bill Yarobourgh on Apirl 5, 2022, undated, unverified, and not signed by Applicant. The Application is believed to have been signed by the formal attorney. Bah v. Enterprise Rent a Car Oct. 24, 2023 F.Supp.3d. S.C. Code Ann. 17-27-80 when reviewing the propriety of a summary dismissal of an application of PCR the Supreme Court must view the facts in the light most favorable to applicant. Leamon v. State (2005) 363 S.C. 432, 611 S.E.2d 494

THE APPLICANT IS ENTITLED TO PRESENT HIS ISSUES IN THE PRESENT PCR BASED ON THE DOCTRINE OF EQUITABLE TOLLING AND RIGHT TO COUNSEL IN A PCR ALLEGING NEWLY DISCOVERED EVIDENCE.

Legal Issues

The Court may have overlooked or misinterpted a critical legal point! In his 2011 and all subsequent filings Applicant appears to have sufficiently raised the issue of newly discovered evidence to allow the circuit court to appoint counsel and conduct an evidentiary hearing. Despite the allegation of newly discovered evidence applicant was never appointed counsel or any hearing granted. Applicant was never appointed counsel and none of his filings captioned under Rule 60 were converted or considered by the circuit court as post-conviction relief action. Prior to dismissal of applicant's second PCR the "Supreme Court held that when the State moves for dismissal under section 17-27-45(A) and the PCR applicant raises an issue of material fact regarding the applicability of the one-year limitation, counsel should be appointed under Rule 71.1(d),SCRCP."McCray v. State, 2012-MO-008 (S.C. Apr 11, 2012). Despite applicant's entitlement to counsel the second PCR was dismissed summarily without having the benefit of counsel. As a result applicant has never been afforded a full and fair opportunity to have counsel and present the issues involving the claim of fraud and the "confession letter". As illustrated by the procedural history as shown at trial through testimony and exhibits, the issues raised in the present action should be considered timely pursuant to the doctrine of equitable tolling in light of continuous efforts by Applicant combined with denial of counsel to which Applicant was entitled. SEE:McCray v. State, 2012-MO-008 (S.C.Apr 11, 2012). SEE: Exhibits #4;#6;#1;#2; #3; and #5 affdivait of petitioner. S.C. Code ANN. 17-27-45(C)

APPLICANT WAS PREJUDICED BY THE TESTIMONY REGARDING THE "CONFESSION LETTER".

At trial in front of the jury Investigator Paul Silvaggio testified that he was contacted by Clemeticia Thomason. T.222. Walker attorney immediately objected to Silvaggio testifying to anything Thomason said. T.222. The objection was sustained. T. 222-223. Silvaggio later testified in front of the jury that he made contact with "Mesha" (Clemeticia) Thomason, Walker's former girlfriend and secured a two-sided handwritten letter. 223. Silvaggio testified that Thomason was Walker's former girlfriend. T. 223 (This was done in a way that would convey to the jury that the letter was from Walker). Silvaggio testified that he collected the letter from Thomason and placed it in property and evidence. T. 223. Silvaggio testified that receiving the letter and talking with Thomason ended the investation of the case. T. 224,l. 2-6. (This was done in a way to convey that the letter from Walker conveyed sufficient evidence to believe Walker committed the crimes charged.) On the second day of trial the State intended to present as evidence. T. 339, Applicant's attorney objected to the introduction of the "confession letter". The matter was addressed outside of the presence of the jury with the court excluding the "confession letter" from evidence as to both defendants. T. 339-346; Ct. Ex. 3. The court of appeals subsequently reversed King's conviction based on the letter's exclusion as to King,(<u>state v.</u> King, 623 S.E.2d. 8115,367 S.C.131 (S.C. 2006). Despite its exclusion from evidence the State nevertheless conveyed to the jury the inculpatory nature of the letter and that it was written by Walker. Applicant was therfore unduly prejudiced by testimony relating to the forged letter. A statement not offered to prove fa asserted,contain info."Which must be proven" <u>Player v. Thompson</u> 193 S.E.2d.531; id. at 364-65,474 S.E.2d. at 815; SCRE 804(b)(3).

Notice to Court

The Court's Order of Dismissal further faults Applicant's failure to present the testimony of Clemeticia Thomason at the hearing. This is error as the hearing was not set nor intended as a full evidentiary hearing. The hearing was set on the State's motion to dimiss based on procedural grounds. Applicant sought to defend against the motion by establishing that his actions were timely given the discovery of new evidence and the actions he took as a result. Applicant sought to show that his actions were timely given the information he received, not whether the information was credible which would be determined at a full evidentiary hearing if the Applicant prevailed on the procedural issues. It was intended by the parties that the hearing being limited to the issue of timeliness and successive nature of the Applicant's claim, reserving the validity or credibility of the expert's opinion along with the testimony of Thomason for a full evidentiary hearing if the Applicant's evidence constitued newly discovered evidence and his actions timely. This was understood and intended between the parties to avoid having both parties be required at the motion hearing to produce expert and lay witnesses on the substantive issue of whether the Applicant actually wrote the "confession letter." As indicated in the Applicant's trial memorandum the Applicant sought to overcome the State's motion to dimiss and be granted a full evidentiary hearing to allow the testimony of Dr. Bennett on the issue of whether the "confession letter" was forged by Thomason. The Court's analysis should therefore be altered or amended to exclude any consideration as to whether Thomason testified at the motion hearing.
To the extent that this issue requires substantiating, Applicant

moves to be allowed to introduce correspondence between counsel as proof of same. The State's account of dates of disposition of motions filed by Applicant are erronous, applicant will attach to this explanation, SCDC form 19-11 "REQUEST TO STAFF MEMBER" from Perry Correction institution mail room dated March 25, 2024 as proof of the same. The lower Court can not except the State's account of facts as truthful. S.C. Code Ann. 17-27-80; Robertson v. State,(2016) 418 S.C. 505, 795 S.E.2d. 29. The lower Court's ruling is error as a material factual and legal matter was overlooked. Applicant established a factual basis by gathering valid evidence proof supported by objective truths and infallible proof to offer as the premise of my claim. SEE: Exhibit #4; #1; and Exhibit: #6; also see: Exhibit #2; & #3. Applicant gave direct testimony on the record to his claim of extrinsic fraud, SEE: motions to compel. A key legal point the Court fail to consider the circuit court fail to construe applicant's Rule (60) as a PCR Hendricks v. State, 387 S.C. 221,692 S.E.2d 892(S.C.2010). Counsel should have been appointed under Rule 71.1(d), SCRCP."McCray v. State, 2012-MO-008(S.C.Apr 11, 2012). Further the State impeded applicant's access to the court for review. SEE: letter's from the Clerk of Court; SEE:Tarpley v. Allen County; Indiana 312 F. 3d.895(7 cir 2007); Rand v. Rowland 154 F.3d. 952(9 cir 1998). Another key legal factor the lower Court fail to consider prior attorney Bill Yarbourgh deficient performance to file newly discovered evidence timely, SEE: Exhibit #3 Applicant's family hired counsel in October 2019 and provided affidavit of the State's wittness Clemeticia "Mesha" Thomason recanting. Applicant gave direct testimony to the circumstances surrounding the issue

The untimely filing of the April 5, 2022 Post-conviction relief application was undated, unverfied, and unsigned "it is generally preferred that a blameless party can't be disadvantage by procedural errors or neglect by his attorney." Harris v. U.S. Retirement BD 198 F3d.(4th cir. 1999). In accordence with SCARC 243(C) Applicant has provided to this Honorable Court factual evidence on the record that convincely demonstrate where the government interference, and the reasonabilable unavailability of the factual basis of the claim impeded the ability to raise the claim, as well as where some other circumstance beyond applicant's control occurred. SEE: McClesky v. Zant;499 U.S. 467,468(1991); Hilton v. State(S.C. 2018) 422 S.C. 204, S.E.2d. 852; Whitehead v. State (1992) 426 S.E. 2d. 315; S.C.Code Ann. 17-27-90 Aice v. State 409 S.E. 2d. at 394. Errors"so harmful to the cause of truth individualy or cumulatively make process fundamentally unfair" Bell v. Duckworth, 861 F2d. 169(7th cir. 1988). Williams v. State 583 S.E.2d. 52 S.C. (2003)."Four petitions didn't require restriction Applicant's subsequent petitions filed in the Court were not in bad faith, rather Applicant excersize of due diligence in pursuit of his right to be heard, access to the court! A standard required to receive benefit of equitable tolling.

Conclusion

Applicant is entitled to an order finding that his claims are timely under the Doctrine of Equitable Tolling and granting an evidentiary hearing to present additional evidence on the substantive issues as well as funding to allow Dr. Bennett's appearance to testify to the substantive issues involving his opinion. For the Facts, Reason, Principles of law and case law precedents citied within this Honorable Court should remand.

S.C.Code Ann. 17-27-60(2003); 17-3-50(B),(C) S.C.Gen. Assembly has allotted $500.00 for investigative and expert services (2003) Applicant respectfully has demonstrated false declarations by the State, and pray that this Honorable Court is not mired in the pas of Dredscott, but rather in the words of Dr. Martin King; Injustice any where is a threat to justice ever-where!

Wherefore, the Petitioner forever Prays...