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SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

On Petition for Writ of Certiorari to
Court of Appeals
Appeal from Jasper County
Honorable Robert J. Bonds, Circuit Court Judge

Appellate Case No. 2026-000960

THE STATE,
RESPONDENT,

v.

JHARAUN M. WASHINGTON,
PETITIONER.

RETURN TO PETITION
FOR A WRIT OF CERTIORARI

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY JANE BROWN
Senior Assistant Deputy Attorney General

DANIELLE DIXON
Assistant Attorney General
S.C. Bar No. 73999

Post Office Box 11549
Columbia, SC 29211
(803) 734-3737

ATTORNEYS FOR RESPONDENT

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2. Because mutual combat is not a stand-alone crime but rather a theory of liability, and the State submitted evidence that the parties were engaged in mutual combat, this argument does not present a special and important reason for certiorari review.

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QUESTIONS PRESENTED

Petitioner's Questions

I. Did the Court of Appeals properly rule that trial counsel failed to raise absence of evidence regarding mutual animosity or ill-will between combatants as an essential element of mutual combat at the directed verdict phase and then waived any defect in such proof supporting the indictment by not objecting to the jury charge that allowed conviction on a basis other than mutual combat?

II. Should the Court of Appeals have reversed the trial court's denial of a directed verdict motion on the State's failure to produce any competent evidence of mutual animosity or ill-will as an essential element of the offensive use of mutual combat as a basis for the indictment of petitioner?

Respondent's Counterstatement of Questions

I. Did the Court of Appeals properly find the issue raised on appeal—whether the indictment enlarged the requisite elements the State had to prove for murder—was not preserved for appeal when Appellant's directed verdict argument never addressed the issue of enlargement of the indictment?

II. Because mutual combat is not a stand-alone crime but rather a theory of liability, and the State submitted evidence that the parties were engaged in mutual combat, does this argument present a special and important reason for certiorari review?

STATEMENT OF THE CASE

Petitioner Jharaun Washington is currently serving a cumulative thirty-nine-year sentence for murder; this charge arose following the fatal shooting of Donovan Hay (Victim) during a shootout between Petitioner and Xavier "Zay" Rivers. On February 24, 2022, the Jasper County grand jury indicted Petitioner for murder and possession of a weapon during a violent crime. (2020-GS-27-528, -79). Rivers was also indicted for murder, and Petitioner and Rivers proceeded to a joint jury trial before the Honorable Robert J. Bonds March 6-9, 2023. (R. 1). The jury convicted Petitioner but acquitted Rivers. Judge Bonds sentenced Petitioner to consecutive terms of thirty-four years for murder and five years for the weapon charge.

STATEMENT OF FACTS

On April 22, 2020, Victim was fatally shot in the head during a shootout. The shootout occurred in an apartment complex in broad daylight and was captured on surveillance video. Prior to the shootout, Victim drove his Chevy Malibu to the apartment complex to visit his sister; Rivers was a passenger (along with two others) and was seated in the back behind Victim. As Victim and his friends arrived, they saw Petitioner with a group of men outside. The men with Petitioner began looking into the Malibu and making gestures as if they were reaching for guns. One of the men later admitted he was armed with a 9mm pistol, which he turned over to police. (R. 54-67, 75-91, 114-43, 152-231, 244-307; 312-70; 373-91; State's Ex. 11-15). [1]

Upon seeing the men, one of Victim's friends became apprehensive that a shooting was about to occur, so he curled up in a ball in the back seat. As Victim and his friends passed the group, one of the men with Petitioner yelled, "that's Zay [Rivers] in the back seat." After the Malibu passed the men, Petitioner walked to a white Cadillac and retrieved a 9mm pistol. He then

[1] State's Exhibit 15 is a composite from several surveillance cameras captured at the same time.

positioned himself behind the open door of the Cadillac with the pistol pointed forward. As this occurred, the Malibu passed the men, turned a corner, and stopped behind two bushes. Rivers got out and retrieved an assault rifle from the trunk. As he did, one of the men with Petitioner yelled, "He's getting a chopper [or] a stick"—slang for a rifle. Petitioner remained behind the open door of the Cadillac with his pistol pointed toward the area the Malibu would travel. (R. 81-91, 114-43, 152-231, 244-307, 312-70, 373-91; State's Ex. 11-15).

Rivers got back in the Malibu with the rifle. As the Malibu drove, Rivers rolled down the driver's side back window and pointed the rifle out the window toward Petitioner. Petitioner remained in the doorway of the Cadillac with his gun visible and pointed toward the Malibu. Lucretia Jordan, who was driving by, saw Petitioner armed with a gun and heard her sister say, "They are about to shoot." Both Petitioner and Rivers began shooting at each other; this was captured on video. Jordan also testified she saw Petitioner shooting at the Malibu. (R. 81-91, 114-43, 152-231, 244-307, 312-70, 373-391; State's Ex. 11-15).

Based on the video, it appears Petitioner fired first. The Malibu stopped after Petitioner fired at it, and Rivers got out of the car and started shooting at Petitioner and his group. One of the bullets struck Victim in the head, killing him. Police recovered twenty-two fired shell casings from the area where Petitioner had been and five fired casings from the area where Rivers had been. Police recovered River's assault rifle from the woods where Rivers fled after the shooting, but they never recovered Petitioner's gun. Forensic testing concluded Victim was not killed by River's assault rifle. (R. 54-91, 94-105, 114-43, 145-231, 244-307; 312-45; 346-70; 373-401; State's Ex. 11-16).

<u>ARGUMENT</u>

1. The Court of Appeals properly found the issue raised on appeal—whether the indictment enlarged the requisite elements the State had to prove for murder—was not preserved for appeal when Appellant's directed verdict argument never addressed the issue of enlargement of the indictment.

In his Petition for Certiorari, Petitioner argues the Court of Appeals improperly found his appellate argument unpreserved. He further contends the Court of Appeals should have reversed based on the State's alleged failure to produce evidence of mutual animosity or ill will, which he maintains is an essential element of using mutual combat to convict him of murder. However, the Court of Appeals properly found the argument Petitioner advanced on appeal was not preserved. Further, where this Court has previously held that mutual combat is a theory of liability rather than a criminal offense, and where the State presented overwhelming evidence that the parties were engaged in mutual combat at the time Victim was fatally shot, the trial court properly denied Petitioner's motion for a directed verdict. Thus, this argument does not present a "special and important reason[]" for certiorari review. <u>See</u> Rule 242(b), SCACR (providing a writ of certiorari "will be granted only where there are special and important reasons").

a. The Court of Appeals properly concluded Petitioner did not raise an issue with the enlargement of the indictment on appeal.

After the State rested, Rivers moved for a directed verdict, arguing the State had not presented evidence of malice aforethought or that Rivers caused anyone's death. Rivers further argued "this is not a mutual combat case" because "[m]utual combat requires the mutual intent and willingness to fight acts of conduct of the parties, and circumstances leading up to the combat. There's no mutual intent to fight in this case." (R. 404-05). Rivers contended the State did not present evidence to identify *Petitioner* as a shooter and thus did not establish "who the mutual combatants are." (R. 404-05). He additionally averred mutual combat required prior ill-will, and

there was no evidence of bad blood or prior disagreement between Rivers "and any of these guys. (R. 405, 407-08). Rivers thus concluded the State had not proven the elements of mutual combat or murder. (R. 409).

In his motion for directed verdict, Petitioner first asserted the State did not produce a lay witness who identified Petitioner as a shooter.[2] (R. 409). Regarding mutual combat, he merely asserted:

> I think with respect to proving all of the elements of mutual combat, if that existed, and, again, I'm not gonna go back through all of the case law that [Rivers] has cited. I know there was no evidence of the disagreement or a pre-existing ill-will between the appellant and the victim in that case.

(R. 409-10). After recounting the evidence, Petitioner averred "[t]here's absolutely zero evidence of any prior difficulties between Mr. Washington and Mr. Rivers." (R. 410). He further contended the State did not present evidence of malice aforethought. (R. 411).

In response to Rivers' argument, the State asserted it had submitted evidence to support what was required by the indictment—i.e., evidence of mutual intent and willingness to fight. (R. 411-12). The Court inquired, "[D]o you have to prove mutual combat beyond a reasonable doubt, and that that mutual combat then, basically, resulted in the death of Mr. Hay; is that what you've got to prove, mutual combat?" The State responded, "That is what occurs when they are indicted for murder for engaging in mutual combat." (R. 413). The State asserted that evidence showing both men armed themselves after seeing each other was sufficient to show evidence of mutual intent to fight. (R. 413-15). The State maintained it did not have to prove "some positive agreement, or demonstration of a positive agreement between the participating parties to enter the

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[2] He acknowledged, however, that Agent Merrell identified Petitioner as a shooter from a surveillance video of the shooting.

combat. It is sufficient if they willfully enter into the conflict upon the impulse of the moment . . . ." (R. 415). The Court asked, "The animus or the bad blood or the—is that a requirement?" The State responded, "It is not." (R. 417).

After the State presented its argument, Petitioner challenged some of the evidence the State relied on. Although *Rivers* challenged the State's assertion that animus, bad blood, or prior ill-will was not required to prove mutual combat, Petitioner did not. (R. 419-26). Petitioner likewise did not argue the wording of the indictment enlarged the elements the State had to prove. The solicitor maintained that animus was not required. (R. 424). The Court determined mutual combat did not require the State to prove "a positive agreement between the participating parties to enter into combat"; rather, "It's sufficient if they willfully enter into conflict upon the impulse of the moment." (R. 426). The Court further concluded the State presented sufficient evidence of mutual combat as well as murder to survive the summary judgment motion.

On appeal, Petitioner argued for the first time that the wording of the indictment enlarged the elements the State was required to prove—i.e., Petitioner contended for the first time that because the State alleged the parties were engaged in mutual combat at the time of the fatal shooting, the State had to prove *all* the elements of mutual combat, including pre-existing dispute or ill-will between the parties. (App. Br. 7-13). The Court of Appeals properly recognized that "the specific issue of whether Washington's guilt was wholly dependent on a finding of mutual combat based on his indictment, as argued on appeal, was not raised to the circuit court." As noted by the Court of Appeals, the conviction of Petitioner for murder was not wholly dependent upon a theory of mutual combat; rather, under the facts and the charge, the jury could find Petitioner killed Victim with malice aforethought even without a finding of mutual combat.

This case is akin to State v. Williams, 439 S.C. 620, 889 S.E.2d 562 (2023). There, the

Court of Appeals reversed a conviction, finding "the trial court erred in not granting Williams' directed verdict motion as to the attempted murder of Ashley R. because the State relied on the doctrine of transferred intent to prove Williams had the intent to kill Ashley R," which the majority found did not apply to specific intent crimes. Id. at 622, 889 S.E.2d at 563. On certiorari, the South Carolina Supreme Court concluded Williams did not preserve this issue for appeal:

> Williams moved for a directed verdict on the sole ground that the State had not presented sufficient evidence as to the identity of the person who shot at Myers and Ashley R. The State responded that it had presented enough evidence to create a jury question as to whether Williams was the shooter. As to Ashley R., the State argued, "just specifically because he was not shooting directly at Ashley, I would point out that we're proceeding under transferred intent and we do believe that he was firing his gun with malice and the bullet struck Ashley R." The trial court denied the motion for a directed verdict, reasoning, in part, that the evidence supported the charges against Williams because there was testimony Williams was firing at Myers and–"by transferred intent"–Ashley R. After presenting his defense, Williams renewed his motion for a directed verdict "for the reasons I stated earlier." The trial court denied the renewed motion. The trial court later instructed the jury on transferred intent without objection.
>
> Williams never asserted there was insufficient evidence of intent or claim the doctrine of transferred intent did not apply to attempted murder as grounds for his directed verdict motion. Transferred intent was brought up only by the State and the trial court.

Id. at 622, 889 S.E.2d at 563.

Here, although the solicitor and the trial court discussed whether the indictment required the State to prove mutual combat, this precise issue was not raised by Petitioner or Rivers. Further, although *Rivers* challenged the State's assertion that animus or prior ill-will was not an element of mutual combat, neither party argued the indictment enlarged the elements that the State had to prove, and Petitioner did not join River's objection to the State's argument. (R. 419-26). Thus, the Court of Appeals properly found this issue was unpreserved. See id.

b. The Court of Appeals did not create a new waiver rule in finding this issue unpreserved.

In arguing this issue was preserved, Petitioner avers the Court of Appeals "improperly created a new issue preservation rule by finding trial counsel's failure to object to the jury charge amounted to a waiver of any appellate review of the state's failure to produce evidence of the elements of the crime charged to avoid a directed verdict." (Pet. 8). This argument, however, takes dicta from the Court of Appeals' opinion out of context. In finding the issue unpreserved, the Court of Appeals found Petitioner did not raise any argument about enlargement of the indictment to the trial court. This finding did not hinge on the jury charge. In noting Petitioner did not object to the charge, the Court of Appeals was not creating a new waiver rule; rather, it was simply noting that the absence of an objection here (as well as Petitioner's closing argument) supported its conclusion that Petitioner was not making the argument he subsequently raised on appeal. Here, where forensic evidence showed Rivers' gun did not fire the fatal shot, the State had to rely on a theory of mutual combat to convict *Rivers*. However, the State did not have to rely on mutual combat to convict Petitioner. Because Petitioner did not raise any argument regarding enlargement of the indictment to the trial court, the Court of Appeals properly found his appellate argument was not preserved.

2. Because mutual combat is not a stand-alone crime but rather a theory of liability, and the State submitted evidence that the parties were engaged in mutual combat, this argument does not present a special and important reason for certiorari review.

Assuming arguendo the issue of whether the indictment required the State to prove mutual animosity or ill-will as an element of mutual combat was adequately raised to the trial court, the trial court properly concluded the indictment did not require such evidence. Further—and critically—even if the indictment *did* require evidence of mutual animosity or ill-will as an element

of mutual combat, the State presented ample evidence from which the jury could infer mutual animosity or ill-will between Petitioner and Rivers. Thus, this argument does not constitute a "special and important reason[]" for certiorari review.

a. The indictment did not require the State to prove mutual animosity or prior ill-will as an element of mutual combat.

In State v. Young, 429 S.C. 155, 166, 838 S.E.2d 516, 522 (2020), the South Carolina Supreme Court concluded "that each participant who willingly engages in mutual combat may be held accountable for the death or injury of an innocent bystander resulting from that confrontation" under a theory of accomplice liability. Critically, the Court clarified that mutual combat is not a crime, but a theory of liability: "Of course, mutual combat is not a stand-alone crime in South Carolina. Rather, it is a theory of criminal liability that underlies a recognized crime such as murder or manslaughter." 429 S.C. at n. 1, 838 S.E.2d at n. 1. Because mutual combat is a theory of liability rather than a crime, it is not a required element of murder. Id.

Petitioner maintains that the indictment's inclusion of an allegation that Petitioner and Rivers engaged in mutual combat, which caused Victim's death, required the State to prove all the elements of mutual combat—which he contends includes evidence of a pre-existing dispute or ill-will. (Pet. 12-13, 16-18). In support, he relies on Bailey v. State, 392 S.C. 422, 709 S.E.2d 671 (2011). However, his reliance on Bailey is misplaced. In Bailey, a PCR case, the State alleged homicide by child abuse by specific injury to the child, but the trial judge charged neglect as a possible element of the offense as well. During deliberation, the jury informed the court it found no evidence Bailey intentionally injured the child as alleged in the indictment and asked if it could convict under neglect. Id. at 436, 709 S.E.2d at 678. The South Carolina Supreme Court concluded counsel was ineffective for not objecting to the *jury charge* on the basis it enlarged the indictment by instructing the jury on neglect as an element of the offense. Id.

Critically, Bailey addressed whether a jury charge enlarged an indictment—not whether the State's indictment, in and of itself, enlarged the elements the State had to prove. In other words, the inclusion of a specific injury in the Bailey indictment required the State to prove a specific injury rather than neglect—but the court's charge allowed the jury to convict based only on neglect. Bailey thus addressed counsel's failure to object to a jury charge—*not* counsel's argument on the motion for a directed verdict. Here, Petitioner does not raise any argument related to the jury charge; rather, he maintains the court erred in denying his motion for a directed verdict. His reliance on Bailey is thus misplaced.

For similar reasons, Petitioner's reliance on State v. Taylor, 356 S.C. 227, 589 S.E.2d 1 (2003) is misplaced. In Taylor, the defendant intervened in a fight between a man named Kevin and a woman named Myranda. The fight between Taylor and Kevin began as a fist-fight but escalated when Taylor pulled out a knife and stabbed Kevin fifteen times. On certiorari, the South Carolina Supreme Court considered whether the trial court erred in charging mutual combat as a bar to Taylor's claim of self-defense. After reviewing cases from other jurisdictions, the Court concluded that mutual combat requires (1) the fight to arise out of a pre-existing dispute and (2) the parties to be armed with deadly weapons. Id. at 233-34, 589 S.E.2d at 4. The Court found there was no evidence that (1) Taylor and Kevin had any animus or ill-will toward one another prior to Taylor intervening in the fight between Kevin and Myranda or (2) Kevin knew Petitioner was armed with a knife. Thus, the Court concluded no evidence showed the parties had a mutual willingness to fight. Id. at 234, 589 S.E.2d at 5.

Similar to Bailey, Taylor addressed the propriety of a jury charge. The issue in Taylor was whether the Court correctly charged mutual combat to negate self-defense—*not* whether the indictment required the State to prove additional elements of a crime. In fact, Taylor did not

consider the State's indictment or Taylor's directed verdict motion at all. Petitioner is attempting to use law related to the propriety of jury charges to persuade this Court to add elements to murder that were not actually indicted.

Petitioner has not cited any case that supports his contention that the indictment added elements to murder that were not stated in the language of the indictment itself. Although State v. Smith, 406 S.C. 215, 219-20, 750 S.E.2d 612, 614 (2013) considered what facts the State was required to prove under an indictment, Smith did not *add* additional elements to an indictment that were not plainly stated in the indictment—as Petitioner is now asking this Court to do. In Smith, the South Carolina Supreme Court held that an indictment for homicide by child abuse under section 16-35-85(A)(1) of the South Carolina Code (abuse or neglect causing death of a child) did not provide notice of a section (A)(2) charge (aiding and abetting abuse or neglect resulting in death of a child), which was a completely different crime. The Court did not add additional elements to the indictment or the charged offense; rather, it clarified that if the State alleged a specific subsection of an offense, it had to submit evidence to prove that specific subsection.

Similarly, State v. Dent, 446 S.C. 121, 136, 91 S.E.2d 394, 402 (2025) did not add additional elements to an indictment that were not plainly stated in the indictment. In Dent, the State indicted Dent for the sexual battery of fellatio. Although the State presented evidence of a multitude of sexual abuse committed by Dent, it failed to present evidence of fellatio. The South Carolina Supreme Court reversed the conviction, finding the indictment did not provide fair notice of the charge. The Dent holding was based on the actual language of the indictment—not an interjection of additional elements not mentioned in the indictment.

Here, the State presented evidence of the specific act—mutual combat—alleged in the indictment. Petitioner is attempting to interject an additional element into the offense—preexisting

ill-will—that is not included in the language of this indictment. At most, assuming the indictment enlarged the elements the State had to prove, it only required the State to prove (in addition to murder) that mutual combat that resulted in Victim's death. The language of the indictment required nothing more. Thus, the trial court's ruling in this regard was correct.

b. The State presented evidence to support mutual combat, including evidence from which the jury could infer prior ill-will.

Viewed in the light most favorable to the State, the State presented evidence of mutual combat. See State v. Harris, 413 S.C. 454, 457, 776 S.E.2d 365, 366 (2015) ("When reviewing a denial of a directed verdict, this [c]ourt views the evidence and all reasonable inferences in the light most favorable to the state."). Mutual combat requires "a mutual intent and willingness to fight, manifested by the acts and conduct of the parties and the circumstances attending and leading up to the combat." Young, 429 S.C. at 160, 838 S.E.2d at 518-19. "The State is required to prove the rival combatants were armed for the mutual combat with deadly weapons and each combatant knew the others were armed." Id. at 160, 838 S.E.2d at 519.

Here, the State presented evidence of a mutual intent and willingness to fight between Petitioner and Rivers. The State likewise presented evidence showing Petitioner and Rivers were armed for mutual combat with deadly weapons and knew the other was armed. The mutual combat arose after Victim and Rivers drove by Petitioner and a group of men, and one of the men with Petitioner recognized Rivers in the car. Thereafter, Petitioner and Rivers retrieved guns and prepared for battle: Petitioner took shelter in the doorframe of a Cadillac and pointed his weapon in the direction of the Malibu while Rivers rode by in then Malibu with an assault rifle sticking out the window. From the foregoing, the jury could easily infer Petitioner and Rivers had a mutual intent and willingness to fight and knew the other was armed with a deadly weapon.

Assuming *arguendo* the indictment required the State to prove pre-existing ill-will between Petitioner and Rivers—which the State does not concede—the State presented evidence from which the jury could infer pre-existing ill-will. Upon seeing each other, both men immediately and simultaneously armed themselves with dangerous semi-automatic weapons and engaged in a shootout in broad daylight. (State's Ex. 11-15; R. 316, ll. 4-25). From the foregoing the jury could easily infer the men had pre-existing ill-will, as no other explanation explains their actions. This isn't a situation where Petitioner sought to intervene in a fight between Rivers and another individual as occurred in Taylor. Further, this isn't a situation where the parties were unaware the other was armed, as the weapons were depicted in the surveillance video, someone in Petitioner's group yelled that Rivers was getting a gun, and Jordan testified she saw Petitioner armed with a gun and heard her sister say, "They are about to shoot."

Based upon the evidence and reasonable inferences therefrom and hviewed in the light most favorable to the State, the State presented evidence of a mutual intent and willingness to fight "manifested by the acts and conduct of the parties and the circumstances attending and leading up to the combat." Graham, 260 S.C. at 450, 196 S.E.2d at 495. Although the State did not prove the parties sat down and agreed to fight, it did not have to. See Young, 429 S.C. at 160–61, 838 S.E.2d at 518–19 ("[T]o constitute mutual combat, it is not necessary that there should be a positive agreement between the participating parties to enter the combat; it is sufficient if they [willfully] enter into the conflict, upon the impulse of the moment." (citing Brown, 108 S.C. at 499, 95 S.E. at 63)). The State presented evidence from which the jury could find Petitioner and Rivers willfully agreed to enter into the conflict upon the impulse of the moment. Additionally, the conduct of the parties upon seeing each other, arming themselves, and engaging in a shootout constituted

evidence from which the jury could infer a prior dispute or ill-will between Petitioner and Rivers. Thus, the trial court properly denied Petitioner's motion for a directed verdict.

CONCLUSION

Based on the foregoing, this Court should deny the Petition for a Writ of Certiorari.

Respectfully Submitted,

ALAN WILSON
Attorney General

DONALD J. ZELENKA
Deputy Attorney General

MELODY JANE BROWN
Senior Assistant Deputy Attorney General

DANIELLE DIXON, 73999
Assistant Attorney General

s/Daneille Dixon

OFFICE OF ATTORNEY GENERAL
Post Office Box 11549
Columbia, SC 29211
(803) 734-6665

ATTORNEYS FOR RESPONDENT

This 8th day of June 2026

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STATE OF SOUTH CAROLINA
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Appeal from Jasper County
Honorable Robert J. Bonds, Circuit Court Judge

Appellate Case No. 2026-000960

THE STATE,

RESPONDENT,

v.

JHARAUN M. WASHINGTON,

PETITIONER.

PROOF OF SERVICE

The undersigned certifies that pursuant to Rule 262(c)(3), SCACR and the Supreme Court order of April 24, 2024, the Return to Petition for Writ of Certiorari, along with the Proof of Service has been forward to Appellant's counsel, Gary H. Jonson, Esquire via email today June 8, 2026 to GHJohnson@sccid.sc.gov and his assistant, Dan Bast at DBast@sccid.sc.gov .

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

This is the 8th day of June 2026.

s/Danielle Dixon
Danielle Dixon
S.C. Bar No. 73999

Office of Attorney General
P. O. Box 11549
Columbia, South Carolina 29211
(803) 734-6305

ATTORNEY FOR RESPONDENT

Brandy Rankin

From:	Brandy Rankin
Sent:	Monday, June 8, 2026 12:45 PM
To:	Johnson, Gary
Cc:	Danielle Dixon; dbast@sccid.sc.gov
Subject:	The State v. Jharaun M. Washington - Appellate Case No. 2026-000960
Attachments:	Jharaun WashingtonRPWC (cert to COA).pdf; Return PWOC pos rpwoc.pdf

Dear Mr. Johnson,

Please find attached the Respondent's Return to Petition for Writ of Certiorari, together with the Proof of Service, in the above-captioned case. These documents will be filed with the South Carolina Supreme Court today, June 8, 2026, along with a copy of this email. Thank you.

Brandy Rankin

Brandy Rankin, Legal Assistant
Office of the Attorney General
Post Office Box 11549
Columbia, South Carolina 29211
803-734-6305

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