RECEIVED
Jun 22 2026
S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA

IN THE SUPREME COURT
APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
The Honorable Marvin Dukes, PCR Action Judge
2020-CP-10-05357

JEROME CURRY,

Petitioner,

v.

STATE OF SOUTH CAROLINA,

Respondent.

NOTICE OF APPEAL

Jerome Curry appeals the denial of his post-conviction relief application. The post-conviction relief action was heard and denied by the Honorable Marvin Dukes, circuit court judge, on August 4, 2025, and was denied by written order issued filed on May 18, 2026. Applicant received notice of the judgement on May 18, 2026.

/s Chelsey F. Marto
Chelsey F. Marto, Esquire
Attorney for the Applicant
The Law Office of Chelsey F. Marto, LLC
P.O. Box 8795
Columbia, SC, 29201
(864)-404-5583

Other Counsel of Record:
Danielle Dixon, Esquire
Office of the Attorney General, State of SC
P.O. Box 11549
Columbia, SC, 29211-1549

STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON	)	COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT
Jerome Curry, Applicant, v. State of South Carolina, Respondent.	)	Case No.: 2020-CP-10-05357 **ORDER OF DISMISSAL**

FILED
2026 MAY 18 AM 11: 2?
JULIE J. ARMSTRONG
CLERK OF COURT

This matter is before the Court by way of post-conviction relief (PCR) applications filed by Jerome Curry (Applicant) on December 4, 2020 (2020-10-CP-4357) and November 30, 2022 (2022-CP-10-5515). On April 3, 2023, Respondent filed a return, motion to merge, and motion to dismiss, asserting the action was untimely and successive, and Applicant did not make a prima facie showing of newly-discovered evidence. On May 18, 2023, the Court issued a Conditional Order of Dismissal, provisionally dismissing the action but providing Applicant twenty days to respond and set forth reasons the action should not be dismissed.[1]

Prior to the issuance of a Final Order, concerns were raised about Applicant's competency in a different PCR action pending in this Court. As a result, Denise Swope, Esquire, was appointed as counsel for Applicant in this action on January 23, 2024. On May 29, 2025, she was relieved at Applicant's request, and Chelsey Marto, Esquire, was appointed to represent Applicant. On August 4, 2025, an evidentiary hearing convened before the Honorable Marvin H. Dukes, III.[2] Applicant

[1] The Court also merged the 2022 action into the 2020 action.

[2] Prior hearings were scheduled but continued for various reasons in April 2023, June 2023, March 2024, September 2024; December 2024; and May 2025. On March 15, 2024, the Court issued an order requiring the Department of Mental Health to conduct a competency to stand trial evaluation. On December 19, 2024, following a status conference, the Court issued an order holding the matter in abeyance pending Applicant's restoration to competency. On July 30, 2025, the matter was restored to the docket with the consent of the parties because there was no indication Applicant's competency would be restored soon, and Applicant had

was present and represented by Ms. Marto. Assistant Attorney General Danielle Dixon represented Respondent. At the hearing, Applicant testified on his behalf. Respondent did not call any witnesses. Following a thorough review of the records before this Court, this Court finds Applicant has not set forth a basis for an evidentiary hearing. Thus, Respondent's motion to dismiss is granted, and this application is dismissed with prejudice.

PROCEDURAL HISTORY

Applicant is NOT presently confined in the South Carolina Department of Corrections.[3] In May 2011, the Charleston County Grand Jury indicted Applicant for indecent exposure (2011-GS-10-2820). On May 8, 2012, Applicant appeared before the Honorable Michael G. Nettles and pled guilty as indicted. Cantrell M. Frayer, Esquire, represented Applicant, and Assistant Solicitor Chad Simpson represented the State. Judge Nettles sentenced Applicant to 90 days' detention (time-served) and ordered him to register on the sex offender registry. Applicant did not appeal.

On March 14, 2013, Applicant filed his first PCR application (2013-CP-10-1540), raising the following grounds for relief (verbatim):

1) Ineffective assistance of counsel.
    a. Did not advise he had to register on sex offender registry;
    b. Stated he would receive time-served;
    c. Failed to use mental health disorder and incompetence as a defense;

---

clearly indicated his wish to proceed with the merits of his PCR action. See Council v Catoe, 359 S.C. 120, 129, 597 S.E.2d 782, 787 (2004) ("[A] petitioner's mental incompetency does not impede his ability to assert his meritorious PCR claims. Therefore, we hold that a petitioner cannot delay his collateral review proceedings due to his incompetency. If, at a future date, the petitioner regains his competency and discovers that at his original PCR hearing, his incompetency prevented his ability to assist his counsel on a fact-based claim of ineffective assistance of counsel, he may then raise that claim in a subsequent proceeding.").

[3] Applicant has completed the sentence for the conviction he is challenging. He was arrested on new charges on January 6, 2026, and is currently detained at Charleston County Detention Center. See Charleston County Sheriff's Office Inmate Report, https://inmatesearch.charlestoncounty.org/PrintInmateDetails.aspx?BookingID=26000179&Status=CURRENT&InmateNumber=&BookingStatus=CURRENT&HashCheck=isQqOh0Xl4EvIrtGH0D32a6H1gg= (last visited April 24, 2026).

d. Failed to obtain a plea of nolo contendere.
e. Failed to give him copy of his mental health results prior to plea.

On May 21, 2014, the PCR court convened an evidentiary hearing before the Honorable Deadra L. Jefferson. Applicant was represented by James Falk, Esquire. Assistant Attorney General Ashleigh Wilson represented the State. Despite proper notice, Applicant failed to appear. On May 21, 2014, Judge Jefferson issued an order dismissing the action for failure to prosecute.[4] Applicant did not appeal.

CURRENT APPLICATION

On December 4, 2020, Applicant filed this PCR application (2020-CP-10-5357) alleging:

1) Ineffective Assistance of Counsel
   (a) "Counsel failed to advise me and the court that I was incompetent at time of offense and should have charges dismiss due to me being incompetent mentally ill."
   (b) Failure to advise Applicant that "I would be on sex offender list if I plead guilty if I had known that I would not plead guilty."
2) Newly Discovered Evidence
   (a) "Newly discovered evidence of mental incompetent at time of offense never brought to judge or me. Held by lawyer."

On November 30, 2022, Applicant filed his third PCR application,[5] alleging:

Ineffective assistance of counsel:

a. "Failure to request competent hearing as required by S.C. Code Ann. §§ 44-23-430, failure to advise court I was mentally ill at time of arrest."
b. "Failing to advise me that if I pled guilty I would have to register. If I had known all this I would have never pled guilty only on advise of counsel I pled guilty."
c. "Based upon after discovered evidence. I discovered evidence on 10/3/22 counsel failed to request hearing to

[4] On June 25, 2014, Judge Jefferson issued a formal order denying Applicant's motions for continuance and recusal that were raised at the PCR hearing.

[5] Applicant also filed a motion for summary judgment raising similar allegations.

determine if I should register."

On April 3, 2023, Respondent filed a return, motion to merge the 2022 action into the 2020 action, and motion to dismiss. On May 18, 2023, this Court issued a Conditional Order of Dismissal provisionally dismissing the application but providing Applicant twenty days to set forth reasons it should not be dismissed.

On April 10, 2023, Applicant served on Respondent "Response to State's Order Granting Respondent's Motion to Merge and Conditional Order of Dismissal/Motion to Strike State's Sham Return Order of Dismissal/Order Granting Applicant's Summary Judgment Motion& Motion for Relief from Void Judgment."[6] In this document, Applicant alleged/requested:

> 1. Respondent's return should be stricken as containing sham defenses that were manifestly false;
>
> 2. Respondent failed to address argument raised in the November 30, 2022 motion for summary judgment;
>
> 3. Claims raised in the application that were not objected to in the State's return are deemed admitted;
>
> 4. "[F]rom the time of the guilty plea till after guilty plea and first PCR hearing I was in and out of mental hospitals I further was incompetent to bring forth any legal action at that appointed time such as PCR or Appeals";
>
> 5. Plea counsel was ineffective for not requesting a valid Blair hearing;
>
> 6. Applicant only pled guilty because counsel advised him to plead guilty;
>
> 7. Applicant would not have pled guilty had he known he would have to register as a sex offender;
>
> 8. Counsel failed to request a hearing to determine "my risk factor to reoffend before judge could have entered judgment ordering me

[6] This was not filed with the circuit court but was served on Respondent and provided to the Court as part of the Court Packet. Although this was served prior to the issuance of the Conditional Order of Dismissal, this Court construes it as a Response to the Conditional Order of Dismissal.

to register thus violation of equal protection of the laws, due process violation and cruel punishment";

9. Thie judgment void under Rule 60(b)(4), SCRCP, in which there is no statue of limitation on void judgment;

10. Applicant's "newly and after discovered evidence was based upon the findings in the Soutth Carolina Supreme Court case of Powell v. Keel, 433 S.C. 457, and Wiseart v. Stewart, 665 S.E.2d 187, in which this case came out (19) years after guilty plea and first PCR hearing," and this claim is thus not time-barred;

11. Respondent is in default for not timely responding to the application and not responding to the motion for summary judgment;

12. Applicant is prejudiced by the State's delay because he is required to register as a sex offender.

On March 31, 2025, Applicant filed a "Motion to Amend PCR Petition and Motion to have PCR Counsel and Court Appointed GAL removed due to Fraud Upon the Court." In this Motion, he alleged his attorney and GAL (appointed in a different PCR matter) violated Rules of Professional Conduct. He also raised allegations related to prison conditions and the calculation of a sentence he was serving on a different conviction.[7]

[7] In addition to the foregoing, Applicant filed several pro se motions, including:

- Motion for Default Judgment (May 19, 2023);
- Petition for Writ of Certiorari in United States Supreme Court (Jul. 14, 2023);
- Motion to Alter & Amend PCR judgment held March 13, 2024 by the Honorable Judge Walton McLeod as pursuant to SCRCP Rule 59(e) (Apr. 4, 2024);
- Motion to Appoint Counsel Denise Swope as Standby Counsel in other PCR action (Apr. 4, 2024);
- Motions to Compel Attorney to produce Client's File Attorney General for Mandamus Filed Oct. 20, 2024 & Petition for Writ of Certiorari for review of PCR Judge the Honorable Walton McLeod's Order dated March 13, 2024, as well as for Civil Rights Lawsuit case no. 0:23-cv-03255-JDA; Petition for Writ of Certiorari & Motion to Compel Attorney General to produce file PCR transcripts of PCR hearing dated March 13, 2024, April 19, 2023, June 27, 2023, as well as any and all documents filed and not filed pro [se] proposed orders in relations & connections with above-entitled cases (Apr. 5, 2024);
- Motion to Relieve Counsel (Apr. 5, 2024);
- Motion to Change Venue & Entry of Default Judgment (Jun. 13, 2024).

Applicant filed the following *pro se* after the hearing in this matter:

- Motion to Relieve Counsel Marto (Sept. 26, 2025);

<u>**MOTION TO DISMISS**</u>

On May 18, 2023, this Court issued an order provisionally granting Respondent's motion to dismiss this application as untimely and successive, and for failing to set forth a prima facie showing of newly-discovered evidence. This Court finds Applicant has not set forth a sufficient basis for an evidentiary hearing. This Court will address Applicant's claims below:

Statue of Limitations

This Court finds this application is barred by the statute of limitations, and Applicant has not set forth a valid reason for tolling the statute. Applicant alleges, "from the time of the guilty plea till after guilty plea and first PCR hearing I was in and out of mental hospitals I further was incompetent to bring forth any legal action at that appointed time such as PCR or Appeals." He thus contends the statute of limitations does not apply to this action. This Court disagrees.

When a PCR "applicant demonstrates the failure to timely file for PCR was due to mental incompetency, the statute should be tolled." <u>Ferguson v. State</u>, 382 S.C. 615, 619, 677 S.E.2d 600, 602 (2009). Here, however, Applicant timely filed a PCR application in 2013, and he was appointed counsel to represent him in that proceeding. Because he timely filed an application, he cannot demonstrate that his failure to timely file the current PCR application was due to incompetency. Thus, <u>Ferguson</u> does not provide a basis for setting aside the statute of limitations.[8]

- Letter requesting filings (Feb. 2, 2024);
- Motion/Support of Motion/Alter Amend PCR Judgement Pending (Feb. 13, 2026);
- Supplemental Pleadings (Feb. 13, 2026);
- Motion/Alter & Amend PCR Judgement (Mar. 2, 2026);
- Motion to Compel Judgement (Mar. 2, 2026);
- Motion Production of Docs, All orders, pro se filings (Mar. 17, 2026);
- Motion to Compel Judgement in pending PCR case (Apr. 1, 2026).

[8] This Court incorporates its analysis of the next section herein and finds those reasons provide an additional basis for not setting aside the statute of limitations.

Successive

This Court further finds this application is successive, and Applicant has not demonstrated a sufficient reason to allow this successive action to proceed.

The PCR statute "forbids a successive PCR application unless an applicant can point to a 'sufficient reason' why the new grounds for relief he asserts were not raised, or were not raised properly." Aice v. State, 305 S.C. 448, 450, 409 S.E.2d 392, 394 (1991). "[A]s long as it was possible to raise the argument in his first PCR application, an applicant may not raise it in a successive application." Id. at 450, 409 S.E.2d at 394. However, a petitioner who is incompetent at the time of his PCR hearing and later regains competency may subsequently raise fact-based claims for which "his incompetency prevented is ability to assist his counsel." Council v Catoe, 359 S.C. 120, 129, 597 S.E.2d 782, 787 (2004) ("[A] petitioner's mental incompetency does not impede his ability to assert his meritorious PCR claims. Therefore, we hold that a petitioner cannot delay his collateral review proceedings due to his incompetency. If, at a future date, the petitioner regains his competency and discovers that at his original PCR hearing, his incompetency prevented his ability to assist his counsel on a fact-based claim of ineffective assistance of counsel, he may then raise that claim in a subsequent proceeding.").

To the extent Applicant contends his incompetency prevented him from attending his first PCR hearing, this Court finds Applicant did not prove he was incompetent at the time of the 2014 PCR hearing. At the 2025 PCR hearing, Applicant testified as follows:

> Q. So what happened with your first application? Why weren't you present?
>
> A. All I remember, like, you can see (indecipherable) records and my mental health evaluation, Your Honor. I'm not on medication, not being treated, in and out the mental hospital over 30 times. Its impossible for me to even present any case like that.

(PCR 99-100). Later, the following exchange occurred:

> Q. So you don't, you were in the hospital when the last hearing was—
>
> A. I was in the hospital many times. And I black—I don't, even can recall how many times I've been in the hospital or anything like that.
>
> Incompetent over three times. It's impossible for me to keep track of things like that. And I moved forward with the case under those circumstances. I was incompetent.
>
> Q. Why did six years pass between when—
>
> A. I mean—
>
> Q. –the last hearing was and when you filed this?
>
> A. That's why I really want to (indecipherable) because I was one of them, and I was staying with them at the time. And he was also working on this with me, the chief public defender, about this. He was trying years ago to get me off this registry because he know it was not right. And actually, it was, I didn't even do whatever they're saying what took place at all. But that's another issue. We're not addressing that right now, but I'm just saying that to say this right here.
>
> He even had to ride me around and get me a place to stay, and give me money, like that, because I could not get a job, a place to stay, nothing because of this offense. And I never raped or did nothing to nobody in my life. And everybody know that, he even know that. But he couldn't at the time, find no kind of avenue or anything like that to bring it back to court to be heard again. And I found it and I discovered it while studying for this case right her now.

(2025 PCR 102-03). Although Applicant generally referenced his prior hospitalizations and mental health conditions, he did not specifically indicate or provide evidence that he was hospitalized at the time of the 2014 PCR hearing.

Further, the Order from the 2014 PCR hearing indicates Applicant did not attend that hearing due to transportation issues.[9] Specifically, the Order states:

---

[9] Applicant did not appeal this order or request a belated appeal of this order.

> The Applicant's counsel represented to the Court that the Applicant was not present for his earing due to transportation issues; Counsel represented that the Applicant did not have the funds for bus fare from West Ashley to the courthouse downtown. Further, Counsel represented that the Applicant just got out of jail and was trying to obtain a new job. Counsel represented that the Applicant told him he was fearful of losing his job if he appeared at his hearing. However, counsel was unable to confirm or provide proof that the Applicant in fact had obtained new employment. a different reason for Applicant's absence.

The contemporaneous evidence shows Applicant did not appear due to transportation issues and concerns about missing work—*not* because his mental capacity prevented him from attending.

Assuming arguendo Applicant was incompetent at the time of his 2014 PCR hearing, this Court finds he has not raised a fact-based claim for which his competency was necessary to assist PCR counsel. Applicant essentially raised three claims related to his underlying plea: (1) he was incompetent at the time of the plea, (2) he was not aware he would have to register on the sex offender registry, and (3) he lacked criminal capacity at the time of the offense. However, the plea transcript directly refutes the first two allegations. First, the Court conducted a Blair[10] hearing; after reviewing Dr. Allison Knight's report dated April 19, 2012, which found Applicant was competent, the plea court found he was competent to proceed. (Pl 8-10). Second, Applicant informed the Court that he understood "the collateral consequence if [the court] put him on the sex offender registry." (Pl. 5). Further, Applicant knowingly and voluntarily entered this plea after being advised of the sentence he faced and the constitutional rights he was waiving. (Pl. 4, 10-11). By pleading guilty, Applicant waived any affirmative defenses he may have had. See State v. Lewis, 328 S.C. 273, 277-78, 494 S.E.2d 115, 117 (1997) ("Insanity is an affirmative defense to a prosecution for a crime."). Based on the foregoing, Applicant has not set forth any fact-based claim for which his competency was necessary to aid PCR counsel at his first PCR hearing and has not

[10] State v. Blair, 275 S.C. 529, 273 S.E.2d 536 (1981) (remanding for a competency to stand trial hearing).

shown a basis for a hearing on this successive application.

Newly-Discovered Evidence

Applicant's raises two allegations of newly-discovered evidence: (a) "Newly discovered evidence of mental incompetent at time of offense never brought to judge or me. Held by lawyer."; and (b) Applicant's "newly and after discovered evidence was based upon the findings in the Soutth Carolina Supreme Court case of Powell v. Keel, 433 S.C. 457, and Wiseart v. Stewart, 665 S.E.2d 187, in which this case came out (19) years after guilty plea and first PCR hearing," and this claim is thus not time-barred. This Court finds the foregoing does not meet the threshold of newly-discovered evidence.

> [W]hen a PCR applicant seeks relief on the basis of newly discovered evidence following a guilty plea, relief is appropriate only where the applicant presents evidence showing that (1) the newly discovered evidence was discovered after the entry of the plea and, in the exercise of reasonable diligence, could not have been discovered prior to the entry of the plea; and (2) the newly discovered evidence is of such a weight and quality that, under the facts and circumstances of that particular case, the "interest of justice" requires the applicant's guilty plea to be vacated.

Jamison v. State, 410 S.C. 456, 470, 765 S.E.2d 123, 130 (2014).

Here, Applicant's mental capacity was addressed at the plea hearing, and the plea court found he was competent to proceed. This Court finds the issue of his criminal capacity at the time of the offense—which is *not* the same thing as competency—is something that Applicant, once competent, would have been aware of in the exercise of reasonable diligence.

Further, his reliance on Keel is misplaced. Although Keel held the *lifetime* registration requirement without any opportunity for judicial review violated due process, it allowed the Legislature to revise the law to correct that provision. 433 S.C. at 472, 860 S.E.2d at 351-52. Thereafter, the Legislature enacted sections 23-3-462 and -463 of the South Carolina Code, which

established a procedure for terminating the registry requirements once certain requirements are met. Thus, Applicant will have an opportunity to petition to be removed from the sex offender registry once he has met the requirements of section 23-3-462.[11] Applicant has not made a prima facie showing of newly-discovered evidence and is thus not entitled to a hearing.

Void Judgment

Applicant next alleges his conviction is void. At the PCR hearing, he asserted "[a] void judgment is any judgment entered without due process, personal jurisdiction, or subject matter jurisdiction." (PCR 101). He alleged his conviction was void

> because I was not entitled to mandatory due process hearing on a risk factor with mental health to see if I was required to register on the sex offender registry for life. Because they said that's cruel punishment and violation of equal protection for me to register for something like that, and I haven't raped nobody or anything like that.

(PCR 103-04). Applicant did not prove this ground.

"A judgment of a court without subject matter jurisdiction is void and constitutes grounds for the court to vacate the judgment under Rule 60(b)(4)." Gainey v. Gainey, 382 S.C. 414, 424, 675 S.E.2d 792, 797 (Ct. App. 2009). "Circuit courts obviously have subject matter jurisdiction to try criminal matters." State v. Gentry, 363 S.C. 93, 101, 610 S.E.2d 494, 499 (2005). "Consonant with the modern understanding, we reiterate that defects in an indictment charging a recognized crime do not deprive a circuit court of its subject matter jurisdiction over a case." State v. Sweet, 446 S.C. 356, 365, 919 S.E.2d 909, 914 (2025).

---

[11] Applicant alternately relies on Wiseart—a 2008 opinion that predated his 2011 plea and thus cannot form the basis of newly-discovered evidence. Notwithstanding this, Applicant's reliance on Wiseart is misplaced. Wiseart merely held a provision of the Act (requiring a person convicted of indecent exposure to register *only if* the trial court made a specific finding that he should register) was retroactive. 379 S.C. at 300, 665 S.E.2d at 187. Here, the plea judge specifically found Applicant should register; his registration was not based on a prior provision requiring automatic registry. Thus, Wiseart is inapplicable.

Here, the circuit court had jurisdiction to accept his guilty plea. Much of Applicant's argument here relates back to the requirement that he register sex offender registry—which he contends violated due process. As set forth in the prior section, his reliance on Keel is misplaced because the Legislature has enacted legislation to remedy the constitutional issue that was addressed in Keel. Applicant has not demonstrated a due process violation, nor has he shown his conviction is void. This claim is thus denied.

Motions

For the reasons set forth herein, Applicant's motion for summary judgment is denied. Applicant's motion to strike Respondent's return and motions for default are denied. See Guinyard v. State, 260 S.C. 220, 195 S.E.2d 392 (1973) (holding the statutory time for filing a return in a PCR action is not mandatory but discretionary with the circuit court, and the circuit court may extend the time for filing a return); Rule 55(e), SCRCP ("No judgment by default shall be entered against the State of South Carolina or an officer or agency thereof . . . unless the claimant establishes his claim to relief by evidence satisfactory to the Court.). Applicant's post-hearing motions to relieve counsel and appoint new counsel are denied. Applicant's pre-hearing motions to amend are granted, and this Court has incorporated those allegations into this order. However, to the extent Applicant's post-hearing motions to amend raise new allegations, they are denied as untimely. Applicant has not set forth a valid basis to change venue (which is proper), and his motions to change venue are denied. Applicant's motions to compel production of discovery and compel judgment are denied as moot, and the motions to alter or amend filed before this order are denied as premature.

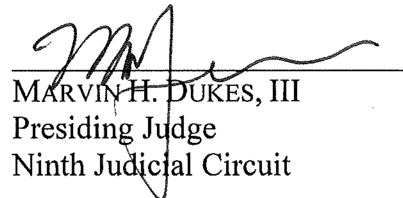
CONCLUSION

Based on the foregoing, this Court concludes Applicant has not set forth a valid basis for an evidentiary hearing. Thus, Respondent's motion to dismiss is granted, and this application is dismissed with prejudice. Should Applicant wish to appeal, he must file and serve a notice of appeal within thirty days of receipt by counsel of written notice of entry of judgment. See Rule 203, SCACR. Applicant has the right to an appellate counsel's assistance in seeking review of the denial of PCR. Austin v. State, 305 S.C. 453, 409 S.E.2d 395 (1991). If Applicant wishes to seek appellate review, PCR counsel must serve and file a notice of appeal on applicant's behalf. Rule 71.1(g), SCRCP. Attention is directed to Rule 243, SCACR, for appellate procedures.

IT IS THEREFORE ORDERED:

1. This application for PCR is dismissed with prejudice; and
2. Applicant shall be remanded to and remain in the custody of the State.

AND IT IS SO ORDERED THIS 5 day of May, 2026.



MARVIN H. DUKES, III
Presiding Judge
Ninth Judicial Circuit

_________, South Carolina

ALAN WILSON
ATTORNEY GENERAL

May 13, 2026

The Honorable Julie J. Armstrong
Charleston County Clerk of Court
100 Broad Street, Suite 106
Charleston, South Carolina 29401

Re: **Jerome Curry v. State of South Carolina**
Case No.: 2020-CP-10-05357

Dear Ms. Armstrong:

Enclosed please find the original Order of Dismissal signed by the Honorable Marvin H. Dukes, III, in the above-captioned case, for filing in your office. Please forward a time-stamped copy back to our office for our file.

Sincerely,

Danielle Dixon
Assistant Attorney General

DD/vh
Enclosure

cc: Chelsey Faith Marto, Esquire