



ALAN WILSON  
ATTORNEY GENERAL

April 28, 2014

**VIA HAND-DELIVERY**

The Honorable Jenny A. Kitchings  
Clerk of Court, S.C. Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**RE: State of South Carolina v. Donnie Thigpen, Jr.**  
**Appellate Case No. 2012-212391**  
**SUPPLEMENTAL CITATION**

Dear Ms. Kitchings:

I am writing to provide the Court with the following supplemental citation, pursuant to Rule 208(b)(7), SCACR, which is relevant to Issue II regarding the admission of Appellant's confession:

Colorado v. Connelly, 479 U.S. 157 (1986) (holding that coercive police activity is a necessary predicate to finding a statement not voluntary; absent this crucial element of state action, a court cannot conclude that a defendant's impaired mental condition alone rendered his confession involuntary).

Thank you for your attention to this matter, and please do not hesitate to contact me at (803) 734-3713 should there be any questions or concerns.

Sincerely,

Christina J. Catoe  
Assistant Attorney General

cc: Tommy A. Thomas, Esquire  
Post Office Box 88  
Irmo, South Carolina 29063

**RECEIVED**

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**SC Court of Appeals**