STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM THE STATE GRAND JURY
Court of General Sessions

The Honorable L. Casey Manning, Circuit Court Judge

Appellate Case No. 2014-001058
Lower Court Order No. 2014-GS-47-237

Ex parte: Robert W. Harrell, Jr,

Respondent.

v.

Attorney General of the
State of South Carolina,

Appellant,

In re: State Grand Jury Investigation.

REPLY BRIEF

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ATTORNEY GENERAL

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Summary of State's Reply to Respondent's Flawed Arguments

In his Brief, Respondent Harrell accuses the Attorney General of mischaracterizing Thrift and mischaracterizing the holding of the lower court that referral is a mandatory prerequisite to criminal investigation and prosecution. Both claims are not only untrue but surprising (or better yet, *telling*), given that Respondent spends the vast majority of brief arguing that Ethics Act violations are civil – while **never** once bothering to mention to this Court South Carolina Code § 8-13-1520, which states:

> (A) Except as otherwise specifically provided in this chapter [13], **a person who violates any provision of this chapter is guilty of a misdemeanor** and, upon conviction, must be fined not more than five thousand dollars or imprisoned for not more than one year, or both.
>
> (B) **A person who violates any provision of this Article 13 is guilty of a misdemeanor** and, upon conviction, must be fined not more than five hundred percent of the amount of contributions or anything of value that should have been reported pursuant to the provisions of this Article 13 but not less than five thousand dollars or imprisoned for not more than one year, or both.

(Emphasis added). Chapter 13 is the Ethics, Government Accountability, and Campaign Reform Act, and Article 13 of Chapter 13 is the "Campaign Finances" portion of the Ethics Act. A crime is a crime; Ethics Act violations can be criminal; and neither law enforcement nor the Grand Jury needs permission to investigate crime, much less the Attorney General permission to prosecute it.

Second, Respondent mischaracterizes or misapprehends Thrift when repeatedly arguing that Thrift held Ethics Act violations are civil. Conduct can at the same time be subject to civil regulation and criminal remedies -- this is fairly common in the law. Thrift merely held that while the statute allows the relevant ethics supervisory body to consider a complaint made to it before referring it the Attorney General, this does not

prevent the Attorney General from preceding on criminal prosecution of the same ethics violations prior to such a referral, because to conclude otherwise would make the referral provision result in an unconstitutional infringement on the powers of the Attorney General. Indeed, Thrift itself and other cases have allowed indictments and convictions for violations of the Ethics Act.

Third, Respondent is incorrect in trying to trying to frame the issue away from a conclusion that the lower court held an Ethics Committee referral is a mandatory prerequisite to criminal investigation, much less prosecution. However, that is precisely what the lower court held, concluding that the Ethics "Act's administrative remedies have not been exhausted", that "until the South Carolina House of Representatives Ethics Committee has either referred the matter to Attorney General Wilson or has otherwise acted on the complaint, exclusive jurisdiction resides solely with the [Ethics Committee]", that the State Grand Jury "lacks subject matter jurisdiction at the present time", and that "neither the State Grand Jury nor any other investigative agency shall take any further action concerning the ethics violations allegations discussed herein until such time as a final determination is made by [the Ethics Committee]". **(R. 252-54)**.

Indeed, while Respondent argues throughout his Brief that he does not ask for criminal immunity for legislators, that is precisely what he does as well. We need only examine Respondent's Brief at page 29, where he argues that "[t]he Attorney General is not authorized to investigate these civil matters, at least until the House Ethics Committee has acted and the administrative remedies have been exhausted." Respondent not only ignores the criminal penalties attached to Ethics Act violations, he seeks a form of criminal immunity from the Ethics Act itself.

In addition, Respondent incorrectly asserts that the Attorney General and the Chief of SLED acted on a citizen's complaint and that there were no allegations of criminality involved. This is based upon the fallacy that violations of the Ethics Act can not have both a civil and a criminal component, and ignores the fact that SLED conducted a ten (10) month criminal inquiry, after which both the Chief of SLED and the Attorney General asserted in the Petition to the Impaneling Judge that a State Grand Jury needed to be convened in order to investigate possible criminality.

Finally, Respondent contends that separation of powers renders the House Ethics Committee the exclusive body to review Ethics Act violations, and that the State Grand Jury possesses no subject matter jurisdiction in this matter. Such a reading of the Constitution is clearly wrong. By cloaking himself in the separation of powers mantle, Respondent seeks to give himself as a member of the legislative branch a form of immunity from investigation and prosecution, where none exists. However, case law clearly holds that separation of powers does not preclude such use of the criminal law against Respondent. Indeed, any claim that the House Ethics Committee is the exclusive forum for Ethics Act crimes, if adopted, would itself violate separation of powers.

I. Violations of the Ethics Act are not merely Civil, but are Criminal

Respondent's arguments regarding his shield from criminal investigation and prosecution are summarized in his Conclusion on pages 28 and 29 and are as follows:

- The citizen's complaint upon which the Attorney General is acting only alleges violations of the Ethics Act.
- The exclusive jurisdiction provided for in the Ethics Act has been held by this Court to be required by the doctrine of separation of powers.
- Violations of the Ethics Act have been unambiguously declared by the Court to be civil rather than criminal in nature.

- The lower court found that the "allegations of the citizens complaint were exclusively within the Ethics Code."
- The Attorney General on several occasions publicly stated that the citizen's complaint must, by law, be sent to the House Ethics Committee, and continued to characterize the complaint as "an ethics complaint" even after he referred the matter to SLED.
- The lower court found that "despite multiple requests, the Attorney General has failed to offer or present to the Court any evidence or allegations which are criminal in nature."
- The Attorney General had no constitutional or statutory authority or any factual basis to declare unilaterally that duly elected members of the House who swore to uphold the constitution would not do so in this case.
- In usurping the jurisdiction of the House Ethics Committee, the Attorney General ignored established precedent and violated state law.

Not once, except for a veiled reference in footnote 5 of his Brief, does Respondent acknowledge that each violation of the Ethics Act is a crime pursuant to § 8-13-1520(A). This provision states as follows:

> (A) [e]xcept as otherwise specifically provided in this chapter, a person who violates any provision of this chapter is guilty of a misdemeanor and, upon conviction, must be fined not more than five thousand dollars or imprisoned for not more than one year, or both.

(emphasis added). This provision could not be clearer. Violations of the Ethics Act can constitute crime.[1] And, in Pierce v. State, 338 S.C. 139, 148, 526 S.E.2d 222, 226 (2000), this Court explained the difference in criminal sanctions between the "old" Ethics Act and the 1991, far more comprehensive Ethics Act. The Pierce Court stated:

> [t]he Legislature did not decriminalize the offenses. "The 1991 Ethics Act reenacts in a different article a more comprehensive series of statutes which address in greater depth the conduct formerly violative of [the statute at issue]." State v. Thrift, 312 S.C. at 304, 440 S.E.2d at 353-54.

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[1] As was stated in Op. S.C. Atty. Gen., August 24, 2006 (2006 WL 2593082), "... we note that the State Ethics Act is a penal statute, attaching criminal penalties to any violation thereof. See, § 8-13-1520." (emphasis added).

II. *Thrift* and Other Cases Did not Hold Ethics Violations are Civil, but Instead Upheld Criminal Prosecutions under the Ethics Act

Peculiarly, Respondent argues that Thrift declares violations of the Ethics Act to be "civil" in nature. Thrift did no such thing.

Thrift involved use of the State Grand Jury's newly expanded public corruption jurisdiction. As the Court noted, "[o]n June 17, 1992, Attorney General Medlock filed a petition with the Presiding Judge of the State Grand Jury requesting authorization, in accordance with S.C. Code Ann. § 14-7-1630 to open the Thrift investigation. Authorization was granted and the State Grand Jury received the first presentation of the Thrift investigation in July 1992." 312 S.C. at 289, 440 S.E.2d at 345.

While Thrift addressed many issues, there is no doubt that the Court most certainly did not conclude that Ethics Act violations were "civil" in nature. Indeed, some of the indictments rendered in Thrift were based upon Ethics Act violations. The Court reversed the trial court which had dismissed indictments under the former Ethics Act on the basis that the 1991 Ethics Act repealed the former Act without a savings clause. Nevertheless, the Thrift Court reinstated those indictments, concluding that the "new" Ethics Act did not repeal the "old" Act, but simply amended it. The Court concluded:

> [i]n the case at bar, there has been no decriminalization; rather, the new statutory scheme sets out more focused provisions regarding what constitutes criminal conduct.

312 S.C. at 306, 440 S.E.2d at 356. Thus, any argument by Respondent that violations of the Ethics Act can not constitute crimes is completely misplaced.

Apparently, Respondent somehow erroneously gets the idea that Thrift deems Ethics Act violations to be "civil" in nature from the Court's discussion of Norman Reeves' argument that the Act required the "Ethics Commission to refer a complaint to

the Attorney General before any prosecution can be maintained." This Court recognized that any such interpretation of the Act would likely render such provision as violative of Art. V, § 24 of the Constitution, designating the Attorney General as the "chief prosecuting officer" of the State. Thus, as courts often do, the Court construed the Act so as to avoid the constitutional dilemma. According to the Court,

> [r]ecognizing the constitutional implications of the State's argument [of unconstitutionality], we note that the entire constitutional issue can be avoided by recognizing the civil nature of the Ethics Act complaint. The older scheme allowed for a civil evaluation by the Ethics Commission prior to criminal referral by the Ethics Commission; and with a narrow reading, the statute does not run afoul of the State Constitution. We accept this narrow construction.

312 S.C. at 307, 440 S.E.2d at 355.

However, this Court was very careful to avoid any room for confusion between the civil nature of any complaint before the Ethics Commission and the criminal nature if and when the Attorney General may decide to prosecute for an Ethics Act violation:

> ... the referral system only applies to civil complaints to the Ethics Commission which are referred by it to the Attorney General for criminal prosecution. The absence of a complaint to the Ethics Commission will never operate as an independent right to initiate a criminal prosecution.

Id. (emphasis added). Thus, as the Thrift Court concluded, "[t]he indictments against Respondents, Sam and Tom Thrift, N. F. Reeves, John Gilreath, and Joel Wilson, were properly brought under the 'old' Ethics Act and would remain viable, absent any other limitations, for prosecution." 312 S.C. at 307-08, 440 S.C.2d at 355; see also Pierce, 338 S.C. at 148, 526 S.E.2d at 226 (reinstating conviction under "old" Ethics Act); Matter of Ulmer, 315 S.C. 188, 432 S.E.2nd 481 (1993) (noting magistrate pled guilty to violation of Ethics Act); State v. James Faber, 1991-GS-40-6993 (accepting a House member's

guilty plea for violations of Ethics Act); Matter of Allen, 314 S.C. 563 431 S.E.2d 577 (1993) (nolo contendere plea to violations of S.C. Code Ann. § 8-13-490 (1986)).

The same reasoning applies to any complaint filed with the House Ethics Committee. While that complaint may be characterized as "civil" when a matter is before the Ethics Commission or Ethics Committee, in no sense is a violation of the Ethics Act "civil" when proceeded upon as a criminal matter by the Attorney General. The absence of a complaint to the Committee can never serve to limit the Attorney General's authority to prosecute an Ethics Act violation as a criminal matter.

Thus, Respondent's argument is nothing more than smoke. By no means did this Court characterize all violations of the Ethics Act as "civil." Those who wrote the 1991 Ethics Act would be shocked to think that all violations of the Act were merely "civil." Indeed, both Thrift and Pierce clearly conclude that the 1991 Act did not "decriminalize" Ethics Act crimes. Respondent's reading of Thrift turns the Ethics Act on its head.

III. Respondent's Argument, that the Attorney General did not Present Evidence of a Crime, is Patently Incorrect

Respondent also attempts to limit the basis "upon which the Attorney General is acting" only to the citizen's complaint forwarded to the Attorney General. Such is ridiculous. Respondent overlooks that the citizen's complaint resulted in a ten month SLED investigation, which then was presented to the acting Presiding Judge, who signed an Order convening a State Grand Jury. Section 14-7-1630(B) requires the Petition to the Presiding Judge to "allege the type of offenses to be inquired into ... by the State Grand Jury." Respondent cannot exploit the secrecy provisions of the State Grand Jury Act by arguing that because he is not privy to any potential criminal allegations then there are none. Moreover, Respondent again overlooks that a Grand Jury is but the beginning of

an investigation into possible criminal conduct, not an end. It does not have to be justified like verdict, much less even a warrant or an indictment.

Moreover, as Respondent's Brief acknowledges, the citizen's complaint enumerates a long list of Ethics Act violations, which, as noted before, all are covered by the criminal penalties in South Carolina Code § 8-13-1520. See Respondent's Brief at 13-14.[2] As stated earlier, each of those alleged violations carries a criminal penalty. Thus, to argue that there was nothing criminal presented either to SLED, the Attorney General or sufficient to convene a State Grand Jury is mere fantasy. Both the Attorney General and the Chief of SLED asserted there were allegations of crimes committed and the Presiding Judge, who must review the Petition, signed the Order convening the State Grand Jury.

IV. Respondent's Argument, that Separation of Powers Insulates him from Criminal Investigation, is Flawed

Respondent's arguments that the doctrine of separation of powers (Art. I, § 8) somehow insulates or immunizes him from criminal investigation or possible prosecution is without any legal foundation whatever. Simply put, there is no recognized criminal immunity for legislators in South Carolina. Art. III, § 14 applies only to civil process, not crimes. Eaddy v. Eaddy, 283 SC. 582, 324 S.E.2d 70 (1984); Williamson v. U.S., 207 U.S. 425 (1908). No decision of this Court has ever interpreted Art. III, §§ 11 or 12 as immunizing legislators from criminal investigation and prosecution. Rainey v. Haley does not come close to doing so.

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[2] Respondent leaves out of his citation that the complaint also cited S.C. Code Ann. § 14-7-1615(B), which defines the State Grand Jury's public corruption jurisdiction.

Neither the doctrine of separation of powers nor Art. III, §§ 11 or 12 immunize legislators from criminal prosecution or deprive the court of subject matter jurisdiction. In Anderson v. S.C. Election Comm., 397 S.C. 551, 725 S.E.2d 704 (2012), this Court rejected the argument that Art. III, § 11, empowering each house to judge elections and the qualifications of its members, deprived the court of subject matter jurisdiction to perform the inherently judicial function of interpreting the law. Likewise, such constitutional provision cannot strip the executive branch of the power to hear a criminal case. Art. III, § 11 or §12 in no sense trumps performance of functions by the Executive or Judicial Branch, such that legislators may not be subject to criminal investigation or prosecution. Likewise, such constitutional provisions cannot strip the Executive Branch of the power to investigate or prosecute a crime, nor can it strip the Judicial Branch's authority to hear a case.

In In re Investigation By Dauphin County Grand Jury, 2 A.2d 804, 808 (Pa. 1938), the Pennsylvania Supreme Court so concluded by finding that the power of impeachment, which rested exclusively with the House of Representatives, did not deprive an investigative grand jury or "the Court to continue the investigation in the existing proceeding of the crimes constituting misdemeanor in office." The Court noted that impeachment and criminal proceedings "are independent of each other ...." According to the Court in Dauphin County, "The power of the quarter sessions, acting by its grand jury, to inquire and to indict, and the power of the legislature to conduct and try impeachments, are independent powers that can be exercised independently and therefore must be so dealt with in order that full effect be given to every provision." Even though both proceedings could be conducted simultaneously, the Court was confident that those

carrying out each proceeding "will exercise such comity as will enable their respective duties to be performed without unnecessary friction."

Likewise, in United States v. Traficant, 368 F.3d 646 (6th Cir. 2004), the Sixth Circuit refuted the argument that it constituted a violation of the Double Jeopardy Clause to allow both Congress and the Executive "to bring an action against him." 368 F.3d at 650. Traficant contended that the Government had to choose between criminal prosecution by the Executive and expulsion by the House. However, the Sixth Circuit deemed such a choice between these proceedings as unwarranted, because they served different purposes, and each proceeding was constitutionally authorized:

> Traficant's argument – that the Double Jeopardy Clause applies across the branches – would implicate the Constitution's provisions for the separation of powers. Classifying the imposition of congressional discipline as a "jeopardy" would mean that merely by punishing (or contemplating punishing) one of its members for conduct that also violates federal law, the Legislative Branch could restrain the Executive Branch from fulfilling its constitutional responsibility to enforce federal law. Notwithstanding "the Executive Branch['s] ... exclusive authority and absolute discretion to decide whether to prosecute a case," United States v. Nixon, 418 U.S. 683, 693 ... (1974). Traficant's theory would shield would-be felons – who just so happen to sit in Congress – from criminal prosecution by the Department of Justice. Congress's slap on the wrist, or even its mere contemplation of a slap on the wrist, would forever tie the Executive Branch's hands.

On the other hand, the Third Circuit reasoned, "... under Traficant's argument, a representative's criminal prosecution by the Executive Branch would immunize that representative from discipline imposed by Congress .... Congress could be powerless to discipline the subset of representatives it would likely consider to be the most deserving of reprimand or removal: those convicted of federal crimes." Id. Thus, both the power of expulsion exercised by the Legislature and the power of prosecution by the Executive, each stands on its own constitutional footing, as neither interferes with the other.

And, in Burton v. United States, 202 U.S. 344 (1906), the United States Supreme Court found that a statute subjecting members of Congress to criminal liability for a violation of U.S. Rev. St. § 1782, making it a misdemeanor for the member of Congress to receive compensation for services rendered before any Department in relation to a proceeding in which the United States is a party or interested, is valid. Senator Burton, who was convicted for a violation of the statute, challenged its constitutionality under Art. I, § 5 which gives each house the power to judge the qualifications of its members, and to expel its members by concurrence of two thirds. These provisions of the federal Constitution are similar to South Carolina's Art. III, §§ 11 and 12. The Supreme Court, in upholding the validity of the statute, found that application of the criminal law to legislators does not trample upon the prerogatives of either house, stating as follows:

> [i]n our judgment, there is no necessary connection between the conviction of a Senator of a public offense prescribed by statute and the authority of the Senate in the particulars named. While the framers of the Constitution intended that each department should keep within its appointed sphere of public action, it was never contemplated that the authority of the Senate to admit to a seat in its body one who had been duly elected as a Senator, or its power to expel him after being admitted, should, in any degree, limit or restrict the authority of Congress to enact such statutes, not forbidden by the Constitution, as the public interests required for carrying into effect the powers granted to it. ... A statute like the one before us has direct relation to those objects, and can be executed without in any degree impinging upon the authority of the Senate over its members or interfering with the discharge of the legitimate duties of a Senator. The proper discharge of those duties does not require a Senator to appear before an executive department in order to enforce his particular views, or the view of others, in respect of matters committed to that department for determination. He may often do so without impropriety, and so far as existing law is concerned, may do so whenever he chooses, provided he neither agrees to receive nor receives compensation for such services.

202 U.S. at 366-367.

Thus, as leading scholars have recognized, only the President of the United States possesses a privilege from criminal prosecution until removal proceedings in the form of impeachment and trial are carried out. The President is unique because he "is a unitary executive." However, unlike a sitting President, "members of Congress, federal judges, Vice Presidents, cabinet officers, and governors can all be prosecuted." Amar and Kalt, "The Presidential Privilege Against Prosecution," 2SPG-NEXJOP 11, 12 (Spring, 1997). Such is the constitutional scheme in South Carolina as well.

Any remaining doubt about these various constitutional provisions depriving the State Grand Jury of subject matter jurisdiction is answered by Art. I, § 11 of the Constitution creating the State Grand Jury, Art. I, § 11 states that "[n]othing contained in this Constitution" was deemed to limit the State Grand Jury as created by the General Assembly. The Legislature possesses the power, pursuant to Art. I, § 11, to bestow upon the State Grand Jury "that other authority, including procedure as the General Assembly may provide." Of course, § 14-7-1630(A)(3) expressly gives the State Grand Jury subject matter jurisdiction over public corruption. The acting presiding judge deemed the requirements of § 14-7-1630(A)(3) to have been met when he signed the order convening this State Grand Jury investigation. Even assuming arguendo that a provision of the Constitution might somehow deprive the State Grand Jury of subject matter jurisdiction, it does not do so here in light of the terms of Art. I, § 11.

V. Any Claim that the House Ethics Committee is the Exclusive Forum for House Ethics Investigations, if Adopted, would Itself Violate Separation of Powers

Rather than separation of powers requiring that the State Grand Jury lacks subject matter jurisdiction, as the lower court concluded, here, the deprivation of subject matter

jurisdiction until the House Ethics Committee has acted or referred the matter to the Attorney General, itself violates separation of powers. As this Court has made clear, separation of powers mandates the Legislature "may not undertake to pass laws and execute them by bestowing upon its members functions that belong to other branches of government." Knotts v. S.C. Dept. of Nat. Resources, 348 S.C. 1, 8-9, 558 S.E.2d 511, 515 (2003). Here, that is precisely what the Legislature has done, if the order of the lower court is affirmed. To require referral from the House Ethics Committee, or that the Committee must first act prior to any investigation and prosecution, contravenes separation of powers because it represents a "bestowing upon the House's own members [prosecutorial] functions that belong to other branches of government," in this case, to the Executive Branch. In the words of the Sixth Circuit in Traficant, supra "it would thwart the constitutional separation of powers if [the Legislative Branch] ... could shield its members from criminal prosecution by the Executive Branch ...." 368 F.3d at 652. Like the Conflicts of Interest Law in State v. Gregorio, 451 A.2d 980 (N.J. 1982), the Ethics Act "is a general legislative enactment applicable to all state officers, employees and members of the Legislature." 451 A.2d at 989. In Gregorio, the defendant was "charged with commission of an offense [under Conflicts of Interest Law], not with violation of a legislative rule." Id. As a result, the Gregorio Court rejected the defendant's argument that separation of powers precluded a criminal prosecution. Id. In particular, the Court provided an example of how each branch of government's concurrent authority works in a given situation stating:

> For example, the exclusive authority to supervise and discipline attorneys rests with the Supreme Court. Nonetheless, no one currently disputes the power of the executive to prosecute an errant attorney whose conduct constitutes both an ethical violation and a crime. Nor could anyone

> reasonably contend that the courts are powerless to exact criminal penalties and to disbar such an individual simultaneously.

Id. at 984 (internal citations omitted). Here, as well, the State Ethics Act is a criminal statute, carrying criminal penalties, which may be prosecuted by the Attorney General as a criminal violation independent of the Ethics Committee's authority to investigate a civil ethics complaint. In short, neither separation of powers, nor Art. III, § 12 divests the State Grand Jury of subject matter jurisdiction, but instead shows that each of the coordinate branches of government have a distinct role in a situation such as this. See Id. (rejecting the argument that separation of powers must be construed a creating "three mutually exclusive watertight compartments" and adding "[s]uch a complete 'hermetic sealing off of the three branches' would render government unworkable.'") (internal citations omitted).

The reasoning of this Court's decision in State ex rel. McLeod v. McInnis, 278 S.C. 307, 295 S.E.2d 633 (1982) is equally applicable here. In McInnis, this Court reviewed a statute creating the Joint Appropriations Review Committee (JARC), composed of six members of the House and six Senators. According to the Court, the Legislature delegated to JARC "the power to control expenditure of state and federal funds." 278 S.C. at 317, 295 S.E.2d at 638. The provisions of the JARC statute, giving the Committee a veto over expenditure of funds appropriated, violated separation of powers in that "the powers assigned to JARC ... are executive in nature and are not reasonably incidental to the performance of any legislative duty." 278 S.C. at 317, 255 S.E.2d at 639. Here, as in JARC, a legislative committee (the House Ethics Committee) is empowered to veto the

carrying out of an executive function, that of criminal prosecution. While the facts of JARC are different, the constitutional principles are the same. If the Legislature wishes to exempt its members from prosecution under the Ethics Act, it should do so directly through the legislative process, rather than delegating the Executive function of prosecution to its Ethics Committees.

CONCLUSION

For all the foregoing reasons, it is respectfully submitted that this Court should reverse the Order of the Acting Presiding Judge of the State Grand Jury.

Respectfully submitted,

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June 6, 2014.

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Appellant,

In re: State Grand Jury Investigation.

CERTIFICATE OF COUNSEL

The undersigned certifies that the Reply Brief of Appellant complies with Rule 211(b), SCACR, and that the Brief also complies with this Court's Order of August 13, 2007.

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PROOF OF SERVICE

I certify that I have served the Reply Brief of Appellant, on Robert W. Harrell, Jr., by email and by depositing a copy of it in the United States Mail, postage prepaid, on June 19, 2014, addressed to his attorneys of record, Gedney M. Howe, III, Post Office Box 1034, Charleston, South Carolina 29402, and E. Bart Daniel, Post Office Box 856, Charleston, South Carolina 29402, and Robert R. Stepp, Robert E. Tyson, Jr., and Roland M. Franklin, Jr, PO Box 11449, Columbia SC 29211.

June 19, 2014

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