

SUPREME COURT OF SOUTH CAROLINA
P.O. BOX 12159
COLUMBIA, S.C. 29211

RECEIVED

FEB 12 2015

S.C. SUPREME COURT

FEB. 9th, 2015

TO WHOM IS IN CHARGE AND CAN HELP ME GET THE RIGHT HELP, THIS LETTER IS TO INFORM SOMEONE OF MY SITUATION AT HAND. FIRST, I JUST CAME OFF A P.C.R., AND NOW I'M ON MY CERTIORARI AND I HAVE A GUY BY THE NAME OF JOHN STROM FROM THE OFFICE OF APPELLATE DEFENSE, I'VE ADDRESSED ISSUES WITH HIM AND HE DON'T WANT TO ADDRESS WHAT'S FACTS. NOW AS OF FEB. 5th, 2015 ANOTHER INMATE WAS HELPING ME WITH MY LEGAL WORK AND HE BRING TO MY ATTENTION THE MURDER ~~INDICTMENT~~ ^{INDICTMENT} IS INCORRECT, IT DO NOT STATE THE TIME AND PLACE OF THE VICTIM DEATH, BUT THE INDICTMENT STATES THAT THE VICTIM DIED IN BERKELEY COUNTY. WHICH IS NOT TRUE, BUT HE DID DIED IN THE [MEDICAL UNIVERSITY OF SOUTH CAROLINA, WHICH IS LOCATED IN CHARLESTON COUNTY IN THE OPERATING ROOM. NOW THAT COUNTY WHICH IS BERKELEY WHERE THEY CONVICT ME AT FOR THIS CRIME AND OTHER CRIME ON AUG. 27-30 OF 2007 IN A JURY TRIAL, DID NOT HAVE SUBJECT MATTER JURISDICTION, I'M REALLY JUST WANTING MY RIGHTS BY LAW TO BE UP HELD WITH THIS SITUATION. PLEASE COULD SOME ONE LOOK INTO THIS →

MATTER AT HAND. HERE IS A COPY OF THAT INDICTMENT AND
THE FORENSIC AUTOPSY FINAL REPORT... MY CASE NUMBER IS,
CASE NO: 2012-CP-08-2771 ~~APPEALING~~ FROM BERKELEY COUNTY
COURT OF COMMON PLEAS, HONORABLE STEPHANIE P. McDONALD, CIRCUIT
COURT JUDGE... I'M LOCATED AT PERRY CORRECTIONAL INSTITUTION
430 OAKLAWN RD. PELZER, SOUTH CAROLINA 29669. PLEASE HELP
ME OUT, FROM MY UNDERSTANDING SUBJECT MATTER JURISDICTION
CAN BE RAISE AT ANYTIME
THE INDICTMENT ONLY STATE THE TIME AND PLACE OF THE ASSAULT!

S/ Cary L. Grant
MR. CARY L. GRANT #280988
PERRY C.I. / C-4-2
430 OAKLAWN RD.
PELZER, S.C. 29669

SUBJECT MATTER JURISDICTION MAY BE RAISED AT ANY TIME, AND THUS, THE SUPREME COURT WAS ABLE TO REVIEW DEFENDANT'S CLAIM THAT TRIAL COURT LACKED SUBJECT MATTER JURISDICTION ON GROUNDS THAT INDICTMENT WAS INSUFFICIENT, EVEN THOUGH HE FAILED TO RAISE THE ISSUE UNTIL HIS PETITION FOR CERTIORARI. *HOOKS V. STATE* 353 S.C. 48, 577 S.E. 2D 211 (S.C. 2003) CRIMINAL LAW KEY 105, 1033.1.

LACK OF SUBJECT MATTER JURISDICTION, ON BASIS THAT INDICTMENT FAILED TO CONTAIN NECESSARY ELEMENTS OF CHARGED OFFENSE, WAS A JURISDICTIONAL DEFECT NOT COVERED BY THE STATUTE WHICH REQUIRED THAT OBJECTIONS TO INDICTMENTS BE MADE PRIOR TO SWEARING IN OF JURY. *HOOKS V. STATE*, 353 S.C. 48, 577 S.E. 2D 211 (S.C. 2003) INDICTMENT AND INFORMATION KEY 196(5)

IN *STATE V. GENTRY*, 610 S.E. 2D 494, OP. NO. 25949 (S.C. SUP. CT. FILED MARCH 7, 2005) WHICH EXPLAINS THAT INDICTMENTS ARE NOTICE DOCUMENTS, NOT DOCUMENTS REQUIRED TO CONFER SUBJECT MATTER JURISDICTION. A PRESENTMENT OF AN INDICTMENT OR A WAIVER OF PRESENTMENT IS NOT NEEDED TO CONFER SUBJECT MATTER JURISDICTION ON THE CIRCUIT COURT. HOWEVER, AN INDICTMENT IS NEEDED TO GIVE NOTICE TO THE DEFENDANT OF THE CHARGE(S) AGAINST HIM. S.C. CONST. ART. I § 11 ("NO PERSON MAY BE HELD TO ANSWER FOR ANY CRIME THE JURISDICTION OVER WHICH IS NOT WITHIN THE MAGISTRATE'S COURT, UNLESS ON A PRESENTMENT OR INDICTMENT OF A GRAND JURY OF THE COUNTY WHERE THE CRIME HAS BEEN COMMITTED..."); S.C. CODE ANN. § 17-19-10 (2003) ("NO PERSON SHALL BE HELD TO ANSWER IN ANY COURT FOR AN ALLEGED CRIME OR OFFENSE, UNLESS UPON INDICTMENT BY A GRAND JURY.")

SOUTH CAROLINA STATUTORY LAW PROVIDES THE FOLLOWING:

EVERY INDICTMENT FOR MURDER SHALL BE DEEMED AND ADJUDGED SUFFICIENT AND GOOD IN LAW WHICH, IN ADDITION TO SETTING FORTH THE TIME AND PLACE, TOGETHER WITH A PLAIN STATEMENT, DIVESTED OF ALL USELESS PHRASEOLOGY, OF THE MANNER IN WHICH THE DEATH OF THE DECEASED WAS CAUSED, CHARGES THAT THE DEFENDANT DID FELONIOUSLY, WILLFULLY AND OF HIS MALICE AFORE-THOUGHT KILL AND MURDER THE DECEASED. S.C. CODE ANN. § 17-19-30 (1985). THIS STATUTE IS CONSISTENT WITH STATUTES ENACTED IN 1880 AND AMENDED IN 1887. S.C. CODE ANN. § 17-19-30 (HISTORY). BASED ON CASE LAW INTERPRETATION AS DISCUSSED HEREIN, IT APPEARS THIS STATUTE CAN BE BROKEN DOWN AND

CONSTRUCTED AS (1) THE INDICTMENT MUST SET FORTH THE TIME AND PLACE "OF MURDER". ALTHOUGH THE WORDS "OF MURDER" ARE NOT PART OF THE STATUTE, CASE HAVE APPARENTLY READ THESE TERMS INTO THE STATUTE; (2) THE INDICTMENT MUST INCLUDE A PLAIN STATEMENT OF THE MANNER IN WHICH THE DEATH OF THE DECEASED WAS CAUSED; AND (3) THE INDICTMENT MUST CHARGE THAT THE DEFENDANT, WITH MALICE AFORETHOUGHT, MURDERED THE DECEASED.

TRIAL COURT LACKED SUBJECT MATTER JURISDICTION ON GROUNDS THAT THE MURDER INDICTMENT WAS INSUFFICIENT ON ITS FACE FOR FAILING TO SET FORTH THE TIME OF THE ASSAULT AND THE TIME OF DEATH, AS WELL AS THE PLACE OF THE ASSAULT AND THE PLACE OF DEATH IN THE BODY OF THE INDICTMENT, WHICH IS A NECESSARY ELEMENT OF THE OFFENSE OF MURDER. THE CRIME OF MURDER IS A COMPOSITE ONE AND THE STATE MUST PROVE NOT ONLY THE ASSAULT AND DEATH OCCURRING FROM IT, BUT THE TIME OF THE ASSAULT AND THE TIME OF DEATH, AS WELL AS THE PLACE OF THE ASSAULT AND THE PLACE OF DEATH. THESE NECESSARY ELEMENTS OF THE CRIME OF MURDER MUST NOT ONLY BE PROVED BEFORE THE ACCUSED MAY BE CONVICTED, BUT THEY MUST BE ALLEGED IN THE INDICTMENT RETURNED AGAINST ACCUSED BY GRAND JURY. STATE V. RECTOR, 155 S.E. 385 (1930). THE PROVISIONS OF THIS SECTION [CODE 1962 § 17-403] RECOGNIZE THAT INDICTMENTS FOR MURDER SHAN COMPLY WITH CONSTITUTIONAL REQUIREMENTS, FOR IN THIS SECTION [CODE 1962 § 17-403] IT IS STATED THAT AN INDICTMENT FOR SUCH CRIME SHAN SET FORTH "THE TIME AND PLACE" OF THE MURDER ALLEGED TO HAVE BEEN COMMITTED. STATE V. RECTOR, SUPRA.

IT IS ABSOLUTELY ESSENTIAL IN AN INDICTMENT FOR MURDER THAT THE PLACE OF THE DEATH OF THE PARTY KILLED SHOULD THERE IN, AND IN THE ABSENCE OF SUCH ALLEGATION INDICTMENT IS FATALY DEFECTIVE AND SHOULD BE QUASHED ON MOTION MADE. FURTHER MORE, SUCH A DEFECTIVE INDICTMENT IS BEYOND THE REACH OF AMENDMENT AS TO SUCH ESSENTIAL ALLEGATION. STATE V. BLAKENEY, 11 S.E. 637 (1890) IF AN INDICTMENT FOR MURDER IS DEFECTIVE IN FAILING TO STATE THE PLACE OF DEATH OF THE PARTY KILLED, ON APPEAL THE JUDGEMENT OF CONVICTION BELOW WOULD DEMAND REVERSAL. STATE V. BLAKENEY, SUPRA.

ISSUES RELATED TO SUBJECT MATTER JURISDICTION MIGHT BE RAISED AT ANYTIME. STATE V. SMALLS, 519 S.E. 2D 793 (CT. APP. 1999). THE ALLEGATIONS OF AN INDICTMENT AS TO THE PLACE OF AN ASSAULT AND THE PLACE OF THE DEATH ARE GENERALLY REGARDED AS ESSENTIAL ALLEGATIONS IN AN INDICTMENT FOR MURDER. STATE V. BOSTICK 131 S.E. 2D 841 (1963); STATE V. PLATT, 151 S.E. 206 (1930) SUCH ALLEGATIONS AFFECT THE JURISDICTION OR THE ESSENTIAL ELEMENTS OF THE CRIME. ID. THIS ISSUE HAS BEEN DETERMINED TO BE JURISDICTIONAL IN NATURE AND THUS WAS TIMELY RAISED BY THE APPLICANT.

SEE INDICTMENT FOR MURDER WHICH READS AS FOLLOWS:

THAT CARY GRANT DID IN BERKELEY COUNTY OR ABOUT THE 2ND DAY OF AUGUST, 2006, WHILE ACTING IN CONCERT WITH CO-DEFENDANTS, FELONIOUSLY, WILLFULLY AND WITH MALICE AFORETHOUGHT, KILL AND MURDER ON DEXTER PERRY, BY MEANS OF BLUNT FORCE TRAUMA TO THE HEAD AND/OR GUNSHOT WOUNDS AND DEXTER PERRY DID DIE, IN BERKELEY COUNTY AS APPROXIMATE RESULT THEREOF ON OR ABOUT AUGUST 2, 2006. THIS ACTION BEING IN VIOLATION OF § 16-3-10 OF THE SOUTH CAROLINA CODE OF LAW (1976) AS AMENDED.

FURTHERMORE, THE MURDER INDICTMENT WAS INSUFFICIENT AS WRITTEN, DUE TO THE FACTS, THAT THESE ALLEGATIONS WAS NOT ALLEGED, FACTS NOT FOUND, OR PRESENTED TO, OR RETURNED BY GRAND JURY THAT ~~INDICTMENT~~ INDICTED HIM BUT WAS REFERRED TO DURING TRIAL AFTER THE JURY WAS SWORN BY SOLICITOR AND DOCUMENTATION, WHICH DID NOT GIVE THE DEFENDANT ADEQUATELY NOTICE OF CHARGES.

THE PLACE OF ASSAULT: AGGRAVATED ASSAULT / SHOOTING 634 DUTCH FORK DR.
THE TIME OF ASSAULT AUGUST 2, 2006. SEE SUPPLEMENTARY REPORT OF REPORTING OFFICERS "SAMUEL GARCIA" ON 8-2-06. SEE ALSO SUPPLEMENTARY REPORT OF REPORTING OFFICER "CRYSTAL SPENCE" TIME OF ASSAULT 6:00 8-2-06 AND SEE TRANSCRIPT OF RECORD (TRIAL) PG. 537 LINES 21-23. THE PLACE OF DEATH: MEDICAL UNIVERSITY OF SOUTH CAROLINA, CHARLESTON COUNTY.
THE TIME OF DEATH: 4:10 AM. IN THE OPERATING ROOM. SEE PAGE 2 OF 11 FORENSIC AUTOPSY FINAL REPORT BY MUSIC ON PATIENT DEXTER PERRY JR.
DEXTER PERRY JR. WAS ASSAULT AT 634 DUTCH FORK DR. IN BERKELEY COUNTY AND DIE AT MEDICAL UNIVERSITY OF SOUTH CAROLINA IN CHARLESTON COUNTY AND NOT BERKELEY COUNTY AT 4:10 AM. IN THE OPERATING ROOM ON AUGUST 2, 2006.

THE FIFTH AMENDMENT OF THE UNITED STATES CONSTITUTION AND ARTICLE I § 11 OF THE SOUTH CAROLINA CONSTITUTION GUARANTEES THAT: "NO PERSON SHALL BE HELD TO ANSWER FOR A CAPITAL OR OTHER WISE INFAMOUS CRIME, UNLESS ON A PRESENTMENT OR INDICTMENT OF GRAND JURY"; S.C. CODE ANN. § 17-19-10 (1976) RESTATES THE RIGHT TO BE INDICTED BY A GRAND JURY.

THIS PROVISION HAS BEEN INTERPRETED TO MEAN THAT, IN THE ABSENCE OF AN INDICTMENT BY A GRAND JURY OR A VALID WAIVER OF PRESENTMENT, THE CIRCUIT COURT LACKS SUBJECT MATTER JURISDICTION OVER THE OFFENSE. CARTER V. STATE, 495 S.E. 2D 773 (1998). A CIRCUIT COURT HAS SUBJECT MATTER JURISDICTION TO CONVICT A CRIMINAL DEFENDANT IF: (1) THERE HAS BEEN AN INDICTMENT RETURNED TRUE BILL BY A GRAND JURY WHICH SUFFICIENTLY STATES THE OFFENSE; (2) THERE HAS BEEN A WAIVER OF PRESENTMENT TO THE GRAND JURY INDICTMENT; OR (3) THE CHARGES IS A LESSER INCLUDED CHARGE OF THE CRIME CHARGED IN THE INDICTMENT. CARTER V. STATE SUPRA.

A CIRCUIT COURT LACKS SUBJECT MATTER JURISDICTION AND MAY NOT ACCEPT A GUILTY PLEA IF THE INDICTMENT DOES NOT SUFFICIENTLY STATE THE OFFENSE. BROWNING V. STATE, 465 S.E. 2D 358 (1995) THIS COURT HAS HELD THAT AN INDICTMENT FOR MURDER IS SUFFICIENT "IF THE OFFENSE IS STATED WITH SUFFICIENT CERTAINTY AND PARTICULARITY TO ENABLE THE COURT TO KNOW WHAT JUDGEMENT TO PRONOUNCE, THE DEFENDANT TO KNOW WHAT HE IS CALLED UPON TO ANSWER AND IF AN ACQUITTAL OR A CONVICTION THERE ON MAY BE PLEADED AS A BAR TO ANY SUBSEQUENT PROSECUTION". JOSEPH V. STATE, 571 S.E. 2D 280, 283 (2002) (CITING STATE V. OWENS, 552 S.E. 2D 745, 751 (2001)). THE COURT MUST LOOK AT A MURDER INDICTMENT WITH A PRACTICAL EYE IN VIEW OF THE SURROUNDING CIRCUMSTANCES WHEN DETERMINING WHETHER IT IS SUFFICIENT AND GOOD IN LAW. WILSON V. STATE, 611 S.E. 2D 901 (2005). TRUE TEST OF SUFFICIENCY OF INDICTMENT IS NOT WHETHER IT COULD HAVE BEEN MORE DEFINITE AND CERTAIN, BUT WHETHER IT CONTAINS THE NECESSARY ELEMENTS OF THE OFFENSE INTENDED TO BE CHARGED AND SUFFICIENTLY APPRISES THE DEFENDANT OF WHAT HE MUST BE PREPARED TO MEET. CODE 1962 § 17-402; STATE V. HAM 191 S.E. 2D 13, 17 (1972).

THE JURISDICTION OF A COURT OVER THE SUBJECT MATTER OF A PROCEEDING IS FUNDAMENTAL. ANDERSON V. ANDERSON, 382 S.E. 2D 897, 900 (1989). "LACK OF SUBJECT MATTER JURISDICTION MAY NOT BE WAIVED, EVEN BY CONSENT OF THE PARTIES, AND SHOULD BE TAKEN NOTICE OF BY THIS COURT." ID. IT IS WELL SETTLED THAT ISSUES RELATED TO SUBJECT MATTER JURISDICTION MAY BE RAISED AT ANY TIME, INCLUDING FOR THE FIRST TIME ON APPEAL IN THIS COURT. CARTER V. STATE, 495 S.E. 2D 773 (1998); STATE V. FUNDERBURK, 191 S.E. 2D 520 (1972). FURTHERMORE, "[T]HE ACTS OF A COURT WITH RESPECT TO A MATTER AS TO WHICH IT HAS NO JURISDICTION ARE VOID". FUNDERBURK 191 S.E. 2D AT 522; BROWN V. STATE 540 S.E. 2D 846 (2001). A JUDGMENT BY A COURT CANNOT BE AFFIRMED WHERE THE COURT HAD NO RIGHT TO ACT, THE ACTIONS AND JUDGEMENT OF THE COURT IN THE ABSENCE OF SUBJECT MATTER JURISDICTION ARE VOID. ID., SEE ALSO, STATE V. SMYTHS, 519 S.E. 2D 793 (CT. APP. 1999) (GENERAL RULE THAT LACK OF SUBJECT MATTER JURISDICTION MAY BE RAISED AT ANY TIME SUPER SEDES S.C. CODE ANN. § 17-19-90). HERE THE LACK OF SUBJECT MATTER JURISDICTION IS A JURISDICTIONAL DEFECT NOT COVER BY THE STATUTE. HOOKS V. STATE, 577 S.E. 2D 211 (2003).

THE SUPREME COURT FURTHER STATED THAT BAIN'S ELASTIC CONCEPT OF JURISDICTION IS NOT WHAT THE TERM JURISDICTION MEANS TODAY; I.E. THE COURT'S STATUTORY OR CONSTITUTIONAL POWER TO ADJUDICATE THE CASE. ID. "THIS LATTER CONCEPT OF SUBJECT-MATTER JURISDICTION, BECAUSE IT INVOLVES A COURT'S POWER TO HEAR A CASE, CAN NEVER BE FORFEITED OR WAIVED. CONSEQUENTLY, DEFECTS IN SUBJECT MATTER JURISDICTION REQUIRE CORRECTION REGARDLESS OF WHETHER THE ERROR WAS RAISED [BELOW]." ID. U.S. V. COTTON, 122 S. CT. 1781 (2002); STATE V. GENTRY, 610 S.E. 2D 494.

TURNING TO SOUTH CAROLINA JURISPRUDENCE, WE NOTE THIS COURT HAS HELD THAT SUBJECT MATTER JURISDICTION IS THE POWER OF A COURT TO HEAR AND DETERMINE CASES OF THE GENERAL CLASS TO WHICH THE PROCEEDINGS IN QUESTION BELONG, PIERCE V. STATE, 526 S.E. 2D 222 (2000); THAT ISSUES RELATED TO SUBJECT MATTER - JURISDICTION MAY BE RAISED AT ANY TIME. BROWN V. STATE, 540 S.E. 2D 846 (2001). THE LACK OF SUBJECT MATTER JURISDICTION MAY NOT BE WAIVED, EVEN BY CONSENT OF THE PARTIES, AND SHOULD BE TAKEN NOTICE OF BY THIS COURT. ID., STATE V. GENTRY, SUPRA.

DOCUMENT NO. 2007-05-08-0014

BCSO, Merrithew

[Signature]

The State of South Carolina

County of Berkeley

COURT OF GENERAL SESSIONS

FEBRUARY TERM 2007

THE STATE

vs.

GARY GRANT

ARREST WARRANT NUMBER
K-107356

ACTION OF GRAND JURY

[Signature]
Foreperson of Grand Jury

VERDICT

Indictment for

MURDER

Foreperson of Petit Jury Date:

DATE 7/24/04
Mary P. Brown
CLERK OF COURT, C.P. & G.S.
BERKELEY COUNTY, SC

CERTIFIED TRUE COPIES OF RECORD
IN THIS COUNTY

14

07 FEB 12 PM 2:11

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FEB 12 2015

S.C. SUPREME COURT

14

STATE OF SOUTH CAROLINA)
)
COUNTY OF BERKELEY)

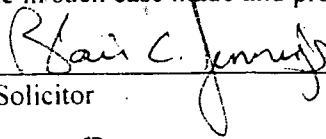
INDICTMENT FOR
MURDER

RECORDED

At a Court of General Sessions, convened on February 7, 2007, Grand Jurors of Berkeley County present upon their oath:

That Gary Grant did in Berkeley County on or about the 2nd day of August, 2006, while acting in concert with co-defendants, feloniously, willfully and with malice aforethought, kill and murder one Dexter Perry, by means of blunt force trauma to the head and/or gunshot wounds, and Dexter Perry did die in Berkeley County as approximate result thereof on or about August 2, 2006. This action being in violation of §16-3-10 of the South Carolina Code of Laws (1976), as amended.

Against the peace and dignity of the State, and contrary to the statute in such case made and provided.


Assistant Solicitor



MUSC
MEDICAL UNIVERSITY
OF SOUTH CAROLINA

Medical University of South Carolina
Department of Pathology and Lab Medicine
185 Ashley Avenue, Suite 309
PO Box 250908
Charleston, SC 29425

Patient: PERRY JR, DEXTER
Med Rec: PERRYDEXTER
DOB: 6/8/1986 Age: 20 years
Sex: Male Race: Black
ACCESSION: FA-06-00468
Date Received: 8/2/2006
Date Collected: 8/2/2006

Page: 2 of 11

F o r e n s i c A u t o p s y F i n a l
R e p o r t

← TIME + PLACE OF DEATH

NOT BERKELEY COUNTY

CHARLESTON
COUNTY
X

at gunpoint. The roommate fired a shot through the window without hitting anyone. At this point, the decedent ran and was shot three times in the back while attempting to escape. The decedent was transported to the Medical University of South Carolina where he underwent left thoracotomy and exploratory laparotomy for multiple gunshot wounds to the back, left shoulder, left axilla and both hands. He received multiple units of packed red blood cells and fresh frozen plasma for massive blood loss. Operative findings included profuse bleeding from left kidney and left axillary vessels. Left nephrectomy was performed. No bullets were found or removed. He died in the operating room at 4:10 a.m.

A complete autopsy is requested by Mr. Sam Tanner, Berkeley County Deputy Coroner, and is performed at the Medical University of South Carolina on August 2, 2006.

Please note that the description of the above events is that which was available at the time of this autopsy and is preliminary and subject to change pending receipt of additional data.

GROSS DESCRIPTION

EXTERNAL EXAMINATION

The body is that of a well-developed, well-nourished, adult black male, who weighs approximately 176 pounds, is 67.5 inches in length, and appears compatible with the stated age of 20 years. The body is identified by the coroner. An identification tag is around the right great toe. Identification bands are around each wrist. The body is cool to the touch. Rigor mortis is partially fixed in all extremities (2-3/4) and jaw (3/4). Livor is indiscernible. The scalp hair is brown and in locks, measuring up to approximately 6 inches in length over the crown. The irides are brown; the pupils are bilaterally equal. The corneae are transparent. The sclerae are anicteric. The conjunctivae are unremarkable. The nasal bridge is straight; the alae are broad. The nares are patent; the nasal septum is intact. The ears are not unusual. The left earlobe is pierced once. The lips are atraumatic. The upper and lower front teeth and incisors are yellow-metal; the other teeth are in good condition. The deceased has mustache and beard stubble. The neck is without masses, and the larynx is in the midline. The thorax is symmetrical with an anteroposterior/lateral ratio of about 1:2. The chest and abdomen are hair-bearing. The abdomen is flat. The penis is circumcised; the testes are bilaterally descended within the scrotum. The anus and back are unremarkable. The upper and lower extremities are well-developed and symmetrical, without absence of digits. Identifying marks and scars consist of the

Department of Pathology and Laboratory Medicine
Forensic Pathology

Chair: Janice M. Laga, M.D.

Director: Kimberly A. Collins, M.D.

Forensic Pathology Phone: 843-792-3500

Forensic Pathology Fax: 843-792-3537

GARY L. BEAULT #280988
PERRY C.I. / C.Y. 2
430 OAKLAND RD.
PULZER, S.C. 29669

ms

"URGENT"

ATTN: SUPREME COURT OF SOUTH CAROLINA
P.O. Box 12159
COLUMBIA, S.C. 29211

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FEB 09 2015

PCI Mailroom

*THOMAS
FRENCH
PULZER*

LEGAL MAIL

THE DEPARTMENT OF CORRECTIONS HAS
NOT INSPECTED OR CENSORED THIS ITEM.
THEREFORE, THE DEPARTMENT DOES NOT
ASSUME RESPONSIBILITY FOR ITS CONTENTS.
PERRY CORRECTIONAL INSTITUTION
SC DEPARTMENT OF CORRECTIONS