ORIGINAL

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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SC Court of Appeals

Appeal from Spartanburg County

J. Derham Cole, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JAMES SCOTT MCABEE,

APPELLANT

APPLELLATE CASE NO. 2014-001528

FINAL BRIEF OF APPELLANT

LAURA R. BAER
Appellate Defender

South Carolina Commission on Indigent Defense
Division of Appellate Defense
PO Box 11589
Columbia, SC 29211-1589
(803) 734-1343

ATTORNEY FOR APPELLANT

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STATEMENT OF ISSUE ON APPEAL

I. Whether the trial court erred in allowing State's witnesses Belue and Habitzruther to testify, over defense counsel's timely objections, to moving to South Carolina because of hard economic times and other difficulties where such testimony was irrelevant and highly prejudicial because it was meant to garner sympathy in a very marginal prosecution?

STATEMENT OF THE CASE

On August 22, 2013, Appellant James Scott McAbee was indicted by the Spartanburg County Grand Jury for assault and battery third degree and carjacking. R.147 (Indictments).

On July 7-9, 2014, McAbee proceeded to trial before the Honorable J. Derham Cole and a jury. Tr. 1. Following jury selection but prior to the commencement of opening arguments, McAbee pled guilty to the charge of assault and battery third degree only.[1] R. 9, 24 – 15, 12. He proceeded to trial on the charge of carjacking. R. 9, 24 – 10, 3. McAbee was represented by Charles William Snyder, III (hereinafter "defense counsel") and the State was represented by Russell D. Ghent and Lindsey Kate Robinette. R. 1.

On July 9, 2014, the jury found McAbee guilty of carjacking. R. 142, 10-11. For assault and battery, Judge Cole sentenced McAbee to thirty days. R. 143, 22 – 144, 1. For carjacking, Judge Cole sentenced McAbee to fifteen years imprisonment, suspended upon service of ten years, followed by three years of probation. R. 144, 2-12.

Appellant timely filed and served his Notice of Appeal on July 16, 2014.

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[1] This charge related to McAbee's sneezing into and throwing a towel at a male nurse at the hospital where he was transported for treatment after the incident.

ARGUMENT

The trial court erred in allowing State's witnesses Belue and Habitzruther to testify, over defense counsel's timely objections, to moving to South Carolina because of hard economic times and other difficulties where such testimony was irrelevant and highly prejudicial because it was meant to garner sympathy in a very marginal prosecution.

Relevant Facts

On June 5, 2013, McAbee was a patron at bar called the Lake Bowen Country Club in Inman, South Carolina. R. 18, 22 – 55, 4. McAbee left the bar at the bartender's request and was heavily intoxicated.[2] R. 21, 15-17. McAbee testified that he unsuccessfully attempted to borrow a cell phone from another patron to call someone for a ride. R. 115, 2-8. He attempted to drive his vehicle but got it stuck in a grassy area off of the side of Highway 9. R. 21, 21 – 22, 2. McAbee "passed out" inside of his vehicle for a period of time. R. 22, 3-10.

McAbee later woke up and proceeded to the median of the road, where he admittedly urinated. R. 29, 1-4; R. 117, 21 – 118, 5. McAbee tried to get passing vehicles to stop for him by yelling and waving his arms. R. 116, 10. When this action was fruitless, he proceeded to step out into the road to try to get a vehicle to stop. R. 116, 22 – 117, 3. He hit the side view mirror of a silver SUV. The SUV turned around and approached McAbee. R. 117, 3-6; R. 117, 9-11. McAbee testified that when he saw the vehicle turn around and approach him, he thought someone was finally going to help him and approached to ask to

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[2] McAbee testified that he had approximately ten shots of vodka and ten beers at the bar. R. 114, 7-17. Witness Kaminski testified that McAbee was not served any alcohol at the bar but was heavily intoxicated upon his arrival at the bar. R. 20, 8-10. The blood alcohol test from the hospital confirms that at 10:55 p.m. on June 5, 2013, McAbee's blood alcohol content was .265, over three times the legal limit for driving. R. 132, 5-9; State's Exhibit 26 (Spartanburg Regional BAC test).

borrow a cell phone. R. 118, 10-13. The occupant of the SUV, John Habitzruther, rolled down his window and yelled "What the hell are you doing?"[3] R. 55, 14-15. Because of his inebriation and slick conditions, McAbee fell into the driver side door of the SUV. R. 118, 14 – 119, 11. McAbee is approximately 6'5" and 300 pounds, so his weight falling into the SUV caused the vehicle to shake. R. 119, 3-11. Within fifteen to twenty seconds of the initial strike of the side view mirror, Habitzruther shot McAbee in his right arm pit with a handgun. R. 118, 18-21; R. 120, 24 – 121, 2; Court's Exhibit 1 (CD of 911 calls). McAbee screamed: "What did you do that for? You shot me. You [fucking] shot me. Why did you do that?" R. 57, 17-18; R. 121, 22-25. He also kicked Habitzruther's vehicle after he pulled to the side of the road and continued screaming. R. 122, 16-19. When officers arrived on the scene, they were not sure who was the victim and who was the aggressor. They threatened to taser McAbee but then realized that he had been shot and provided medical treatment. R. 122, 24 – 123, 18.

Witness Belue

One of the State's witnesses was Kimberly Belue, who passed McAbee when he was attempting to flag down cars. R. 46, 16 – 75, 22. Belue turned around and pointed her headlights in McAbee's direction to determine if he needed help when she saw McAbee hit the SUV's mirror and the SUV driver turn around. R. 51, 21-25. Her testimony that she allegedly saw McAbee try to open the door of the SUV and believed that McAbee was attempting to pull Habitzruther from the vehicle supported the State's claim that McAbee intended to take Habitzruther's vehicle. She overheard some of the statements made by both

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[3] This statement seems inconsistent with Habitzruther's testimony at trial that he was unsure who was at fault and turned around out of concern for McAbee's well-being. See R. 94, 3-5; 99, 13-18; 100, 16-20.

McAbee and Habitzruther and, though she was not close enough to see their faces, she observed portions of their interaction. R. 55, 11 – 58, 20.

Assistant Solicitor Ghent elicited the following from witness Belue during direct examination: (1) her ten year old son Carter was in the car with her, crying and begging her to leave; (2) her husband is deceased; (3) she relocated to South Carolina from Rhode Island five years prior; (4) her relocation was economically related and "for a better life"; and (5) she has no other children. R. 60, 14 – 61, 24. Defense counsel objected on the ground of relevance after the solicitor's questions regarding Belue's deceased husband and her move from Rhode Island, but the trial judge overruled the objection. R. 61, 3-4. The Solicitor commented on the irrelevant testimony elicited from Belue during his closing argument, stating: "You've got to ask yourselves of all of the crimes that could be committed, of all of those people who could be vulnerable, who was with Kim Belue? Her child... Kim Belue moved from Rhode Island when that state went belly up." R. 138, 23-25; R. 139, 3-4.

Witness Habitzruther

The alleged victim, John Habitzruther, also testified at the trial. R. 88, 22 – 108, 5. Assistant Solicitor Ghent began his direct examination of Habitzruther with a similarly irrelevant colloquy, eliciting the following information: (1) he used to own a construction company in Michigan; (2) his business was affected by the housing crisis, which left Detroit bankrupt; (3) he relocated "for a better life" and a construction job in the Cliffs community; (4) South Carolina appealed to him because of the "basis of Christianity here" and "seemed like a peaceful place to live"; (5) he and his family are strong believers in Jesus Christ; (6) his construction work at the Cliffs "feel apart" between 2008 and 2010; (7) he filed bankruptcy; (8) he has now moved to Wyoming to manage a drilling operation; and (9) he is

making preparations to move his family from Spartanburg. R. 89, 6 – 90, 24; R. 92, 6-8; R. 92, 22-23; R. 93, 6-8. Defense counsel objected to the questioning on the ground of relevance and the trial judge overruled it. R. 89, 24 – 90, 3. The Solicitor capitalized on the admission of the irrelevant testimony by asking the jury to reward Habitzruther with a conviction of McAbee by stating during his closing argument:

> And congratulations to us as Spartans. We've lost somebody who moved a thousand miles to come here and work... We have got to do our job, do our duty as citizens in this community, to show that the conscience of the community and Spartanburg is a very good, fair, righteous but truthful statement of what this community believes in.

R. 139, 2-3, 6-9.

Habitzruther testified that he obtained a concealed weapons permit and carried a gun for safety, after wanting to get one for years. R. 91, 15-18. He testified that he was going to pay a storage fee when he saw McAbee on the road asking for help. R. 94, 9-12. Habitzruther stated that he was not sure whether he hit McAbee with the SUV or vice versa, and turned around because he "was concerned with Mr. McAbee's wellbeing."[4] R. 94, 3-5; R. 99, 13-18; R. 100, 16-20. Habitzruther testified that the hit caused his vehicle to swerve and end up sideways in the road. R. 99, 22 – 100, 4. He then turned around and approached McAbee, rolling down his window. Habitzruther stated that McAbee "got within about a foot of the car, and he [McAbee] just went into a rage," grabbing his left arm and almost ripping it off trying to pull him out of the vehicle. R. 94, 13-21; R.

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[4] There were several inconsistencies between Habitzruther's testimony at trial and the statements that he made to the 911 operator, including whether McAbee **hit his car or his car hit McAbee**, whether he was grabbed and/or pulled by McAbee, and the cause and severity of any injuries Habitzruther incurred. Compare R. 101, 17-18; R 102, 21-23; R. , 106 – 107, 25 with Court's Exhibit 1 (CD of 911 calls).

95, 4-9. Habitzruther reached for his gun and shot McAbee, causing McAbee to stumble backwards. R. 95, 10-15. Habitzruther testified that while he called 911, McAbee attempted to open the car door, and "beat" and kicked the SUV. R. 95, 19 – 96, 13. The first deputy to approach the SUV described Habitzruther as polite and calm despite the fact that Habitzruther told the deputy that "he was attacked and he shot somebody." R. 76, 2-7. Habitzruther testified that he was not threatened with being or actually charged in relation to the shooting of McAbee.[5] R. 92, 9-12.

Discussion

Assistant Solicitor Ghent wanted to admit irrelevant evidence because the alleged victim could have been charged himself in connection with his shooting of McAbee. The evidence regarding witness Belue's deceased husband, how many children she has, her son's reaction to events observed, and why she moved to South Carolina and the evidence regarding witness Habitzruther's relocation from Michigan to South Carolina, his financial difficulties, his religious values, and his plans to move his family to Wyoming were irrelevant and properly objected to by defense counsel. The admission was unduly prejudicial because it was intended to garner sympathy in this marginal case. The solicitor capitalized on the irrelevant evidence in his closing argument, in which he encouraged the jury to reach their verdict on an improper ground.

The trial judge is given broad discretion in ruling on questions concerning the relevance of evidence, and his decision will be reversed only if there is a clear abuse of

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[5] In response to the solicitor's question regarding whether Habitzruther was charged, Sheriff's Deputy Lachica testified that he did not believe the shooter was ever charged. R. 78, 8-9. Sheriff's Deputy Williams confirmed to the solicitor that the shooter, Habizruther, was not arrested at the scene and was never charged. R. 79, 12 – 80, 16.

discretion. "Relevant evidence" is defined as "evidence having any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence." Rule 401, SCRE; see also State v. Alexander, 303 S.C. 377, 380, 401 S.E.2d 146, 148 (1991) ("Evidence is relevant if it tends to establish or make more or less probable some matter in issue upon which it directly or indirectly bears."). "Evidence which is not relevant is not admissible." Rule 402, SCRE. "Evidence should be excluded if it is . . . irrelevant or unnecessary to substantiate the facts." State v. Stokes, 339 S.C. 154, 159, 528 S.E.2d 430, 432 (Ct. App. 2000) (quoting State v. Langley, 334 S.C. 643, 647, 515 S.E.2d 98, 100 (1999)). Courts must be extremely careful not to permit evidence of a tendency to excite or influence the resentment of jurors, and which does not tend to support the evidence or to connect the defendant with the commission of the crime. Id. (citations and quotations omitted).

A person is guilty of carjacking, as defined in S.C. Code Ann. § 16-3-1075, "who takes, or attempts to take, a motor vehicle from another person by force and violence or by intimidation while the person is operating the vehicle or while the person is in the vehicle." As the trial judge explained during the instructions to the jury, the State was required to prove beyond a reasonable doubt that McAbee did attempt to take a motor vehicle from Habitzruther, that the attempt to take the vehicle was accomplished by the use of force and violence or by intimidation, and that the attempt to take the vehicle occurred while Habitzruther was operating or in the vehicle. R. 140, 18 – 141, 5. "In order to constitute an attempt to commit a crime it is essential that coupled with the

[specific] intent to commit the crime there be some overt act in furtherance of the intent." R. 141, 13-22.

In the present case, the Trial Court erred in admitting irrelevant evidence over defense counsel's objection. The Trial Court allowed Assistant Solicitor Ghent to elicit testimony regarding Belue's deceased husband, how many children she has, her son's reaction to events observed, and why she moved to South Carolina. These questions have nothing to do with any fact of consequence to the determination of the action because they have no bearing on whether or not McAbee attempted to take a vehicle from another by force and violence or intimidation while the person was operating or in the vehicle. See S.C. Code Ann. § 16-3-1075. Neither Belue nor her son was in the vehicle where the alleged carjacking took place. Thus, evidence of the child's presence in her car and his reaction served "no legitimate evidentiary purpose." See Stokes, 339 S.C. at 159, 528 S.E.2d at 432. Additionally, Belue's status as a widow and relocation to South Carolina had no bearing on the facts to be decided in the case.

The Trial Court also allowed the solicitor to ask Habitzruther about when and why he moved from Michigan to South Carolina, his financial difficulties, his religious values, and his plans to move his family to Wyoming. R. 89, 4 – 93, 8. Habitzruther's background and relocation have nothing to do with the factual issues that the jurors had to decide as to McAbee's guilt. While the eventual questions about Habitzruther's employment as a bail bondsman were tangentially relevant to why he was armed, the copious preliminary questioning about his prior employment, bankruptcy, hope that South Carolina would be a Christian-like and peaceful place, and his relocation out of the State were not relevant.

The introduction of the irrelevant evidence was prejudicial to Petitioner because it encouraged the jury to render its verdict based on sympathy rather than the facts, as was argued by the Solicitor in his closing. In State v. Langley, 334 S.C. 643, 515 S.E.2d 98 (1999), the solicitor called the victim's sister to testify regarding the victim's family, how he acquired his nickname, where he attended high school, and that he was a drummer in the band. She also identified a photograph of the victim. 334 S.C. at 647, 515 S.E.2d at 100. The Court found that neither the testimony nor the photograph were relevant to proving Langley's guilt. Id. at 648, 515 S.E.2d at 100 ("We find Ms. Jones' testimony and the victim's photograph were not relevant to proving the guilt of appellant."). The Court rejected the State's argument that the evidence was relevant to the victim's identity, finding that identity was not at issue in the case. Id. Therefore, the only possible purpose was to attempt to distance the victim from the drug dealing occurring at the location he attempted to enter prior to his death and to neutralize testimony of other State's witnesses regarding the victim's drug use. Id. This character evidence was not proper when the defense had not attacked the victim's character. Id.

Similarly in the present case, the testimony presented by the State was not relevant to proving McAbee's guilt and was introduced for an improper purpose prejudicial to McAbee. Regarding Habitzruther, the State was attempting to garner sympathy for an unsympathetic "victim" who shot a severely inebriated individual who was seeking help. This was also an improper attempt to distance Habitzruther from any possible negative perception of his actions that night, which the jury could properly infer from Habitzruther's statement on the 911 call that he thought he shot McAbee in the mid-section, seeming dissatisfaction that McAbee is not more severely injured, and expression of an unreasonable

belief that his life was endanger while waiting for police to arrive. See Court's Exhibit 1 (CD of 911 calls). Regarding Belue, the State elicited irrelevant information in an attempt to garner sympathy from the jury for a widow, raising her only child and witnessing the alleged crime after moving to Spartanburg for a better life. The Solicitor capitalized on the admission of this irrelevant evidence in his closing argument, in which he stated:

> You've got to ask yourselves of all of the crimes that could be committed, of all of those people who could be vulnerable, who was with Kim Belue? Her child. Who was with Michael Arledge? His wife.[6] This man was alone that night. And congratulations to us as Spartans. We've lost somebody who moved a thousand miles to come here and work. Kim Belue moved from Rhode Island when that state went belly up.
>
> We have got to do our job, do our duty as citizens in this community, to show that the conscience of the community and Spartanburg is a very good, fair, righteous but truthful statement of what this community believes in.

R. 138, 23 – 139, 9; see State v. Davis, 239 S.C. 280, 122 S.E.2d 633 (1961) ("The solicitor should prosecute vigorously; he must prosecute fairly, for the concern of the state, whose representative he is, is not that a defendant shall be convicted, but that justice shall be done."); Jones v. Commonwealth, 196 S.E.2d 482, 486 (Va. 1954) ("During his examination of witnesses, and in his argument, [the prosecutor] should not resort to appeals to sympathy, passion or prejudice."); People v. Andre, 585 N.Y.S.2d 792, 793 (N.Y. App. Div. 1992) (finding that prosecutor's reference to People's key witness as a "brave young girl" during summation as "inflammatory and improperly appealed to the

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[6] Michael Alredge and his wife, Traci Alredge, were also bystanders who stopped to observe McAbee after seeing him flagging down vehicles. However, once the SUV turned around and approached McAbee, they could not see McAbee or Habitzruther from their vantage point.

sympathy of the jury"). The solicitor's statements encouraged the jury to render a guilty verdict because they felt sorry for Kim Belue and her "vulnerable" child, who were not even the alleged victims but rather bystanders parked safely up the road. The solicitor also encouraged a finding of guilt because McAbee's alleged crime drove Habitzruther away from Spartanburg, when he moved here to work.

Admission of the irrelevant testimony was not harmless because witnesses Belue and Habitzruther were the State's two key witnesses, both of whom testified that McAbee attempted to pull Habitzruther through the car window. Belue also testified that McAbee attempted to open the car door prior to being shot, though Habitzruther testified that the attempt to open the door was after the shooting. None of the other witnesses were at a vantage point where they could see the driver's side of the vehicle, thus it was Belue and Habitzruther's testimony alone that provided the evidence of the attempted taking and the use of force and violence. Therefore, the improper introduction of irrelevant evidence aimed at gaining sympathy for these witnesses was not harmless.

Moreover, there was not overwhelming evidence of McAbee's guilt. See Langley, 334 S.C. at 648, 515 S.E.2d at 100 ("Because the evidence of appellant's guilt was not overwhelming, we cannot find this irrelevant evidence did not affect the outcome of the trial under a harmless error analysis."). Here, the defense presented a legitimate theory that McAbee, in his drunken state, stumbled into the SUV and was clumsy rather than aggressive. The defense further presented evidence that Habitzruther approached McAbee because he was angry that McAbee hit his car, leading Habitzruther to exaggerate his story in an effort to justify his shooting a helpless, unarmed man.

McAbee's testimony that he was attempting to flag down a vehicle for help was supported by the testimony of all of the State's eye witnesses. R. 116, 20 – 117, 4, R. 118, 9-13, and R. 121, 7-9 (McAbee's testimony); R. 25, 10-16 (Robert Kaminski's testimony); R. 38, 8-10 (Michael Arledge's testimony); R. 44, 13-14 and R. 45, 16-23 (Traci Arledge's testimony); R. 67, 8-16 (Kim Belue's testimony); R. 94, 9-12 (John Habitzruther's testimony). McAbee testified that he fell into the vehicle due to the undisputed conditions of his intoxication and the slick ground. R. 118, 14-21, R. 119, 23 – 120, 3, and R. 124, 10-14 (McAbee's testimony); R. 27, 1-3 (Robert Kaminski's testimony "But he was still very, appeared very, intoxicated"); R. 29, 16-17 and R. 38, 15-18 (Michael Arledge's testimony "It appeared to me that he was very intoxicated..."); R. 101, 21-21 (John Habitzruther's testimony "It was dark, it was raining...). On cross-examination, Assistant Solicitor Ghent commented that McAbee's story left the jury with two things to decide, either he is "the unluckiest son of a gun in the history of Western civilization or [he] ain't telling the truth." R. 129, 9-14. However, defense counsel pointed to the consistency in McAbee's common sense explanation of events and emphasized that McAbee was "just drunk" and not trying to take the car as a repeated refrain during his closing. He argued that Habitzruther mistakenly believed McAbee was lunging at him. R. 133, 22 – 134, 2; R. 134, 12 – 136, 21.

The defense also drew out inconsistencies in Habitzruther's testimony. Habitzruther testified that he was unsure of whether McAbee hit his car or he hit McAbee, and turned around out of concern for McAbee. R. 94; 3-5; R. 99, 13-18; R. 100, 16-20; R. 101, 17-18; However, his statement to the 911 operator showed no

equivocation that McAbee was the one who hit the SUV.[7] Court's Exhibit 1 (CD of 911 calls). Additionally, Belue testified that Habitruther's said "What the hell are you doing?" when he approached McAbee. R. 71, 10-17. This statement appears inconsistent with Habitzruther's claim of concern and belief he may have been at fault in the contact between McAbee and the SUV. Habitzruther also testified that he wanted to get a concealed weapons permit "for years" because it was his right. R. 91, 7-16. Habitzruther seemed disappointed on the 911 call that McAbee was not more severely injured after the shooting. He also indicated on the call that he shot McAbee in the mid-section, which if true may indeed have yielded more severe injury to McAbee. Court's Exhibit 1 (CD of 911 calls). Thankfully for McAbee, Habitzruther shot him in the arm pit rather the mid-section that he intended. Habitzruther also seemed to exaggerate his injuries, claiming that his shoulders are uneven as a result of the incident, preventing him from exercise and causing tingling in his fingers even a year later. R. 94, 13-17; R. 107, 13-19. However, Habitzruther sought no medical treatment for these alleged injuries. R. 107, 23-25.

Defense counsel argued in closing that Habitzruther's testimony is based on a need to justify himself for shooting a helpless man and pointed to the changes and inconsistencies in Habitzruther's story. R. 130, 23 – 131, 14. The defense argued that Habitzruther was mad that McAbee hit his car and drove up with his gun drawn, accounting for the extremely brief time period before the shot. R. 131, 14-17; R. 134, 3-6. Conversely, Assistant Solicitor Ghent made clear to the jury that Habitzruther was

[7] Though he otherwise claimed to be unsure who hit whom, Habitzruther drifted from his new story of concern for McAbee once during his direct testimony, stating "And when he hit my car, he said I need some help." R. 94, 9.

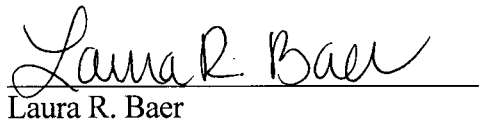
never charged in the case, implying that at least the police believed his story that he was justified in shooting McAbee. R. 78, 8-9 (Deputy Lachica testimony); R. 79, 12 – 80, 16 (Deputy Williams testimony); R. 92, 9-12 (John Habitzruther testimony). The solicitor argued in closing that Habitzruther was not "dying to use that gun" and has been so affected by the incident that he is moving. R. 137, 2-8. He argued that the reason Habitzruther stopped was because he's "a good individual" and "human nature is sometimes better in some people than others." R. 137, 18-21. The reason the solicitor was able to argue these irrelevant facts, was because the Trial Court erroneously admitted them into evidence. This was certainly not a case of overwhelming evidence of guilt, thus the admission of the irrelevant evidence was error, prejudicial to McAbee, and not harmless.

Therefore, the trial court erred in overruling defense counsel's relevancy objections to the solicitor's questions of witnesses Belue and Habitzruther that were not related to any fact of consequence to the case. The Solicitor's goal was to arouse sympathy in the jury, which he argued during his closing. Moreover, admission of the testimony was not harmless because there was not overwhelming evidence of McAbee's guilt.

CONCLUSION

For the reasons set forth herein, Appellant James Scott McAbee respectfully requests this Court to reverse his convictions and remand for new trial.

Respectfully submitted,



Laura R. Baer
Appellate Defender

ATTORNEY FOR APPELLANT

This 15th day of July, 2015

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Spartanburg County

J. Derham Cole, Circuit Court Judge

THE STATE,

RESPONDENT,

V.

JAMES SCOTT MCABEE,

APPELLANT

APPLELLATE CASE NO. 2014-001528

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the Final Brief of Appellant in the above referenced case has been served upon Megan Harrigan Jameson, Esquire, at Rembert Dennis Building, 1000 Assembly Street, Room 519, Columbia, SC 29201, this 15th day of July, 2015.

Laura R. Baer

Laura R. Baer
Appellate Defender
ATTORNEY FOR APPELLANT

SUBSCRIBED AND SWORN TO before me
this 15th day of July, 2015.

Bailey Wolf (L.S.)
Notary Public for South Carolina

My Commission Expires: October 24, 2021.