Mr. Norman Keith Burgess, #353672
Broad River Correctional Inst.
Murray Unit B-236
4460 Broad River Rd.
Columbia, SC 29210

Date: 6/21/2016

The Supreme Court Of South Carolina
The Honorable Daniel E. Shearouse,
Clerk Of Court
Post Office Box 11330
Columbia, SC 29211

Dear Mr. Shearouse:

Enclosed please find for filing and processing with the supreme court of South Carolina. The pro se brief response to be included with the petition filed by counsel, on June 6, 2016. I was requested to provide this court with any argueable issues I believe the court should consider in this appeal.

Sincerely,

S/ Norman K Burgess

STATE OF SOUTH CAROLINA)
COUNTY OF PICKENS)

NORMAN KEITH BURGESS, #353672)
APPLICANT,)

-VS-)
STATE OF SOUTH CAROLINA)
RESPONDENT.)

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT
CASE NO. 2016-000143

PRO SE RESPONSE BRIEF

Now comes the applicant, Norman Keith Burgess, #353672, into the court appearing through pro se representation who respectfully filed this response and raise all argueable issues that I believe the court should consider in this appeal.

Defendant's case is one of clear and plain manifest injustice not only of his trial but also there after to a gross degree. Defendant's trial was extremely, unfair or served any degree of justice as chief justice.

The court cannot any longer turn a blind eye to the injustices that the defendant has suffered due to gross incompetence, inability or plain out uncaring of the attorneys who represented defendant at trial and since. The court must ensure that the issues involved in this case are full aired out or admit that there is no justice for the unprivileged in South Carolina.

Did defendant receive ineffective assistance of counsel in accordance with the sith Amendment when his trial counsel contacted no exculpatory witnesses and did not do anything to refute the expert testimony proposed against him, so overall ineffectiveness requiring a new trial.

Counsel was ineffective overall, when he failed to properly prepare for trial, investigate all the elements of alleged crime, crime scene, and challenges to the sufficiency of the charged.

The counsel was ineffective in failing to object to williams being qualified as an expert in defendant's case. State v. Kromah 401 S.C. 340, 737 S.E. 2d 490 (2013). Williams subsequent testimony which mirrored exactly the claims of the complainant was an attempted end-run around this court's decision in Kromah and its predecessor cases. See State v. Douglas, 380 S.C. 499, 500,671 S.E. 2d 606 (2009); State v. McKerley, 397 S.C. 461, 464, 735 S.E. 2d 139, 141 (ct. App.2012). The only purpose of williams testimony was the improper invasion of the province of the jury. Kromah at 358, 737 S.E. 2d at 499-500. The only inference to be drawn from williams testimony was that the complainant was telling the truth. It was error to allow this testimony. Id. It impermissibly bolstered the state's case.

Defendant have suffered a miscarriage of justice and his conviction only stands due to severe denial of due process and equal protection in the state court, in multiple and gross violation of the United States Supreme Court precedents and the United States constitution, that constitutes an outrage of mockery of justice that the federal courts who sworn to uphold the United States constitution should not tolerets.

A criminal defendant is guaranteed the right to effective assistance of counsel under the sixth Amendment to the United States constitution. U.S. const. Amend. VI; Strickland v. Washington, 466 U.S. 668, 669 (1984). In a PCR proceeding, the burden is on the applicant to prove the allegations in his application. Ard v. Catoe, 372 S.C. 318, 331, 642 S.E. 2d 590, 596 (2007) (citation omitted). This court will uphold factual findings of the PCR court if there is any evidence of probative value to support them. Webb v. State, 281 S.C. 237, 238, 314 S.E. 2d 839, 839 (1984) (citation omitted). However, this court will not uphold the findings of a PCR court if no probative evidence supports those findings.

The defendant contends that counsel failed to notify witnesses of his PCR relief hearing when defendant went to court on December 14, 2015, at the Pickens county courthouse. And the court gave defendant a continuance to his case to December 16, 2015, by the time defendant went to his PCR hearing after the continuance it was December 16, they move the PCR Hearing to Greenville county courthouse, for the next PCR hearing. Which defendant were not allow to inform his family of the moving of his PCR hearing. Defendant informed his counsel to notify his witnesses and family of the change of the county, from Pickens county to Greenville county were his PCR hearing will be held on December 16, 2015, defendant was prejudice from having his witnesses at the PCR hearing to testify on his behalf. Please find enclosed documentations that will reflect that defendant wrote to his counsel informing him of the circumstances.

In order to prove trial counsel was ineffective, the PCR applicant must show, counsel's performance was deficient; and there is a reasonable probability that, but for counsel's errors, the result of the proceeding would have been different. Ard, 372 S.C. at 351, 642 S.E. 2d at 596 (citing Strickland, 466 U.S. at 687; Rhodes v. State, 349 S.C. 25, 30-31 561 S.E. 2d 606, 609 (2002).

Regarding the deficiency prong, the proper measure of counsel's performance is whether he has provided representation within the range of competence required by attorneys in criminal cases. McHam v. State, 404 S.C. 465, 474, 746 S.E. 2d 41, 46 (2013) (quoting Butler v. State, 286 S.C. 441, 442, 334 S.E. 2d 813, 814 (1985). Regarding the prejudice prong, the defendant will show there is a reasonable probability that, but for counsel's unprofessional errors the result of the proceeding would have been different. Hill v. Lockhart, 474 U.S. 52, 57 (1985) (citing strickland, 466 U.S. at 694). A reasonable probability is a probability sufficient to undermine confidence in the outcome of the trial. Strickland, 466 U.S. at 694.

Post-conviction relief counsel's failure to investigate potential witnesses was not a strategic choice that precludes claims of ineffective assistance. Applicant's counsel did not attempt to interview potential witnesses. Kemp v. Leggett, 635 F. 2d 453 (granting relief where counsel failed to interview single witness); Gaines v. Hopper, 575 F. 2d 1147 affirming relief where counsel failed to interview eye witnesses.

To prove prejudice, petitioner must show that there was a reasonable probability that for counsel's errors, the result of proceeding would be different. Cherry v. State, 300 S.C. 386 S.E. 2d 624 (1989). A reasonable probability "is simply a probability sufficient to undermine confidence in the outcome of the trial. Johnson v. State, 325 S.C. 182, 480 S.E. 2d 733 (1997). In addition, counsel must articulate a valid reason for employing a certain strategy to avoid a finding of ineffectiveness. Roseboro v. State, 317 S.C. 292, 454 S.E. 2d 312 (1995). Trial counsel can be found ineffective for failing to object to an improper jury instruction or in failing to request a jury instruction that should have been given. He can be held ineffective for failing to object to the improper admission of character evidence, or prior bad acts, or illegally obtained statement, confessions, or improper searches.

Shauna Galloway Williams, statements was improperly corroborated because she never were in the presence of the victim when she conducted her assessments. The South Carolina Supreme court has addressed the issue of improper corroboration testimony in criminal sexual conduct cases on many occasions resulting in a rule as a matter of Law that when the improper corroboration testimony is erroneously allowed in, it satisfies the prejudice prong of Strickland v. Washington, 466 U.S. 668, 104 S.Ct. 2052. In State v. Barrett, 299 S.C. 485, 386 S.E. 2d 242 (1989).

Tr. P. 195, lines 12-25. The forensic counseling interviews of child abuse Ms. Shauna Galloway Williams, stated that she never meet with the victim in this case. How is it possible she could make an assessment without interviewing the victim to find out what happened in this case. I see she had been counseling children and adults involved in sexual abuse a little over eleven years.

Tr. P. 179, 12-25. The defense counsel asked Ms. Williams, do you know why you're testifying here today? She stated I'm testifying as an expert witness to share information about the issues related to child abuse and sexual assault.
Q. okay. and who subpoenaed you?
A. the solicitor's office.
Q. okay. and are you being paid by our office to be here today?
A. she stated no.
Q. Have you ever had any contact with the victim in this case.
A. She stated no.
Q. where does your funding come from?
Tr. P. 180, lines 1-6
A. At the Center?
Q. At the Center?
A. The Julie Valentine Center is funded--about a third of our funding is United Way funding in Greenville county. another thrid of it is through federal grants, the violence against women act, VOCA, DHEC,

The children's trust fund. And the other third is made up of donations of fund raisers.

Tr. P. 180, lines 9-18. Okay. now, is that funding in any way, I guess, contingent upon what you say here today?
A. NO
Q. Now, you said you don't know the victim. You've never spoken to her, I take it?
A. no
A. no
Q. Have you ever viewed any of her written statement?
A. no
Q. Have you ever viewed her video recorded statements?
A. no.

Q. And other than the conversations you've had with me have you done any other investigatory work or looked into this case at all?
Ms. Williams stated no.
Tr. P. 196, lines 2-25. We're trying to determine whether someone is telling the truth or not. When we conduct a forensic interview we are trying to present the facts that the child is sharing But in this case it impossibly to testify about this child by not coming in contact with her.

Defendant was convicted of lewd act on a child, second degree criminal sexual conduct (CSC) and third degree CSC with a minor after a jury trial held before the Honorable G. Edward Welmaker on December 19, 2012 in Pickens county, consecutive respective sentences of 150 months, 200 months, and 100 months were imposed. John Abdalla, Esquire was trial counsel. Sam Tooker, Esquire was the solicitor. (App. P. 1-p. 427).

Petitioner appealed his convictions and the appeal was dismissed by the court of appeals on June 25, 2014, pursuant to Anders v. California, 386 S.C. 738, 87 S.Ct. 1396 (1967). Petitioner filed an application for post-conviction relief on July 29, 2014. (App. p. 428-p. 435). Respondent filed a return dated January 8, 2015. (App. p. 436-440) An evidentiary hearing was held on December 16, 2015, before the Honorable Perry H. Gravely. Petitioner was present and represented by Mills Arial, Esquire. Respondent was represented by Karen Ratigan, Assistant Attorney General. Both petitioner and trial counsel testified at the hearing. (App. p. 441-p. 470) On January 14, 2016, Judge Gravely issued an order denying and dismissing petitioner's application for post-conviction relief. (App. p. 471-477).

Did the PCR judge err in finding that petitioner's sixth and fourteenth Amendment right to counsel were not violated because defense counsel failed to sufficiently investigate, prepare and present the case? Petitioner claims that the PCR judge erred in finding that his defense counsel were not ineffective for failing to prepare and present the case as required under the sixth Amendment. The very promise of our adversary system of criminal justice is that partisan advocacy on both sides of a case will best promote the ultimate objective that the guilty be convicted and the innocent go free. Herring v. New York, 422 U.S. 853, 95 S. Ct. 2550, 2555, 45 L. Ed. 2d 593 (1975).

FALSE TESTIMONY

Conviction must be set aside if false testimony could have affected the judgment of the jury. Hernandez v. Estelle, 624 F. 2d 313 (5th cir. 1983). Especially if it was due to action of the prosecutor, and the prosecutor witheld any promise to victim. See Brady v. Maryland, 373 U.S. 83, 83 S.Ct. 1194, Moore v. Ill 408 U.S. 783, 93 S.Ct. 2562. It is the duty of counsel to bring out these things by putting the state's case to the proper adversary test, an accused is entitled to be assisted by an attorney,whether appointed who plays the Rule necessary to ensure the trial is fair. Avery v. Alabama, 60 S.Ct. 321, see also Strickland v. Washington, 104 S.Ct.2052.

When trial counsel fails to object to impermissible hearsay testimony as in Joll v. State, 314 S.C. 17, 443 S.E. 2d 566 (1994) and Sanchez v. State, 351 S.C. 270, 569 S.E. 2d 363 (2002) does such deficient performance satisfy Strickland's prejudice prong as a matter of Law, or can the "overwhelming evidence Rule still apply? The Supreme Court of South Carolina has addressed the issue of improper corroboration testimony in criminal sexual conduct cases on many occasions resulting in a rule as a matter of Law that when the improper corroboration testimony is erroneusly allowed in, it satisfies the prejudice prong of Strickland v.Washington, 466 U.S. 668, 104 S.Ct. 2052. In State v. Barrett, 299 S.C. 485, 486 S.E. 2d 242 (1989), the court ruled "improper corroboration testimony that is merely cumulative to the victim's testimony, however, cannot be harmless because it is precisely this cumulative effect which enhances

the devestaing impact of improper corroboration " Id. The court later cited this exact language in Joll. Each time the court has discussed improper corroboration testimony in criminal sexual conduct cases, it has cited the Jolly or Barrett decision in the portion of the opinion addressing the prejudice prong of Strickland. The court clearly states that the improper testimony cannot be harmless. See State v. Barrett, 299 S.C. 485, 386 S.E. 2d 242 (1989).
Jolly v. State, 314 S.C. 17, 443 S.E. 2d 566 (1994). Sanchez v. State, 351 S.C. 270, 569 S.E. 2d 363 (2002), Dawkins v. State, 345 S.C. 151, 551 S.E. 2d 260 (2001). In the 2002 case, Ingle v. State, 348 S.C. 467, 560 S.C. 467, 560 S.E. 2d 401, the court clearly addressed the issue and its application to the strickland prejudice prong.

As to the prejudice prong of the Strickland test. We reiterate that improper corroboration testimony that is cumulative to the victim's testimony is harmful since "it is precisely this cumulative effect which enhances the devastating impact of improper corroboration. Dawkins, Supra; Jolly, Supra. We hold trial counsel's deficient performances in allowing the hearsay testimony of both Ms. Shauna Galloway Williams, a forensic interviews and Rhonda Watson, Picken High School english teacher, and a journalism tescher. Clearly prejudiced petitioner.

The court, as in the other related cases on this, did not go through and analysis of the entire set of facts for each case in determining the prejudicial prong of Strickland. It simply stated the error cannot be harmless. Ingle v. State, 348 S.C. 467, 560 S.E. 2d 401 (2002).

In order to thoroughly analyze something that "cannot be harmless "one must define the term harmless the definition of "harmless error "is well setted in South Carolina as error which would not reasonably have affected the result of the trial. State v. Key, 256 S.C. 90, 180 S.E. 2d 888 (1971). Furthermore, for the error to be harmless, the court must determine beyond a reasonable doubt the error complained of did not contribute to the verdict obtained. Taylor v. State, 312 S.C. 179, 439 S.E. 2d 820 (1993) (citing Arnold v. State, 420 S.E. 2d 834, 839 (1992)).

Error that is "not harmless, or cannot be harmless would be considered harmful, meaning but for that error, there is a reasonable probability the result at trial would have been different. Strickland. The court has held that there can be error that is harmless in a case. In Geter v. State, 305 S.C. 365, 409 S.E. 2d 344 (1991), the court held that the trial counsel's deficient performance even if corrected would not have affected the outcome of the trial. This theory is referred to as the overwhelming evidence "theroy.

The Geter case is a good definition of "harmless error" in practice. In the Geter case, the court held that the trial counsel was deficient for not objecting to repeated references to the defendant's prior in carcerations Id. The court then went onto analyze the prejudice prong of Strickland, and how it applied to the facts. In the Geter case, there were four victims with one incident. All four victims provided admissible testimony about the details of the assault. There was also actually physical evidence found on three of the victims two days after the incident. Geter did not involve improper corroboration testimony which was cumulative with any of the victims testimony. Each victim was allowed to testify about the specifics of the assault because each victim was present at the incident. It is clear that, in some cases there can be overwhelming evidence to an extant that the prejudice prong cannot be met,however, if the deficiency of trial counsel involves not objecting to improper corroboration testimony that is cumulative to the victim the court has held that this error cannot be harmless. See State v. Barrett, 299 S.C. 485, 386 S.E. 2d 242 (1989), Jolly v. State, 314 S.C. 17, 443 S.E. 2d 566 (1994), Sanchez v. State, 351 S.C. 270, 569 S.E. 2d 363 (2002(, Dawkins v. State, 346 S.C. 151 S.E. 2d 260 (2001). Ineffect, the court holds that the error is so egregious that there is no amount of other evidence that can overcome this prejudice.

State has an obligation to ensure that on indigent defendant has a fair opportunity to present his defense, this includes the assistance of an investigator. To obtain the appointment of either an expert or an investigator, the defendant must file a motion contuining specific facts showing a particular need for their services. In United States v. Patterson, the court held that an expert should be appointed to assist the defendant when the government's case rests heavily on the theory presented by its own expert. In United States v. Durant, a case in which video tape, evidence was pivotal, the court held that an expert should have been appointed to educate defense counsel as to the technicalities of the video tape admitted so that his cross-examination could be more effective.

Where a state obtain a criminal conviction in a trial in which the accused is deprived of the effective assistance of counsel, the state unconstitutionally deprives the defendant of his Liberty, Cuyler, 446 U.S. at 343, 100 S.Ct. at 1175. The right to the effective assistance of counsel is recognized not for its own sake, but because of the effect it has on the ability of the accused to receive a fair trial. United States v. Cronic, 466 U.S.648, 658, 104 S.Ct. 2039, 2046 (1984).

Defendant contends that the prosecution withheld exculpatory evidence from his defense at trial. Because the defendant never had the opportunity to review the two late indictments that was Amended at his trial, the day before jury trial defendant where presented two more indictments.

It is impossible to proceed in a case without the benefit of discovery. An attorney or investigator should speak with the client and determine which items to request it should also be determined whichwitness to contact and interview. Prosectors have a habit of providing incomplete lists and latercalling the witness and claiming that they had not initially intended to call the witness.

An individual asserting a **Brady violation must demonstrate that evidence ;(1) favorable to the accused; (2) in the possession of** or know by the prosecution; (3) was suppressed by the state; and (4) was material to the accused's guilt or innocence or was impeaching. Kyles v. Whitley, 514 U.S. 419 (1995); Gibson, supra. If a Brady violation is found to have occurred, PCR must be granted.

Gibson, supra. Defendant points to one instances the two indictments coming against defendant day before his jury trial. Of alleged Brady violations. WE find it necessary to discuss only the facts the indictments came late.

Accused who was convicted of state crimes held to have presented to state trial court and the state's highest court federal constitutional claim under Brady v. Maryland, 373 U.S. 83 (1963), concerning state's alleged withholding of exculpatory evidence. Youngblood v. West Virginia, 547 U.S. 867 126 S.Ct. 2188 (2006).

STATE OF SOUTH CAROLINA)	STATE OF SOUTH CAROLINA
COUNTY OF PICKENS)	IN THE SUPREME COURT
)	CASE NO: 2016-000143
NORMAN KEITH BURGESS, #353672)	
APPLICANT,)	
)	
-VS-)	CERTIFICATE OF SERVICE
)	
STATE OF SOUTH CAROLINA)	
RESPONDENT.)	
)	

The undersigned, applicant, Norman Keith Burgess, # 353672, being sworn says that he have served the RESPONSE BRIEF, to the South Carolina Supreme Court. I have raise all argueable issues that I believe the court should consider in this appeal. The expiration of forty-five (45) days will be up July 21, 2016. And this RESPONSE BRIEF of Law in support in the above reference matter to be included with the petition for writ of certiorari indicating that this appeal is proper before the court. I do hereby under oath and penalt of perjury certify that I have serve copies of the documents upon the below parties upon this exact date.

S/ Norman K Burgess,
APPLICANT

cc: Karen Christine Ratigan, Esquire
Robert M. Pachak, Esquire

sworn to and subscribed before me
this 23rd day of June 2016
(L.S.)
Notary Public For South Carolina
My Commission Expires: ,

JANELLE Y. SPEARMAN
Notary Public-State of South Carolina
My Commission Expires
August 26, 2025

R. MILLS ARIAIL, JR.
ATTORNEY AT LAW

11 NORTH IRVINE STREET, SUITE 11 • GREENVILLE, SC 29601
PHONE 864.232.9390 • FAX 864.232.9392 • E-MAIL MILLS@RMALAWOFFICE.COM

November 19, 2015

LEGAL MAIL
Norman Keith Burgess SCDC# 353672
Broad River Correctional Institution
4460 Broad River Road
Columbia, South Carolina 29210

RE: Norman Keith Burgess vs. State of South Carolina
Case No: 2014-CP-39-0909

Dear Norman Keith Burgess:

I received your letter and I was unaware that you had filed an Amended PCR Application. From my review of your initial PCR Application, it seems that you have included all of the information that we need to proceed. If you would like to file an Amended PCR Application, please send me a copy of what you would like to file so it can be preserved by the Court.

Thank you for your consideration of this letter.

Sincerely,
LAW OFFICE OF R. MILLS ARIAIL, JR.
Attorney at Law

R. Mills Ariail

R. Mills Ariail, Jr.

RMAjr/dl

R. MILLS ARIAIL, JR.
ATTORNEY AT LAW

11 NORTH IRVINE STREET, SUITE 11 • GREENVILLE, SC 29601
PHONE 864.232.9390 • FAX 864.232.9392 • E-MAIL MILLS@RMALAWOFFICE.COM

December 8, 2015

LEGAL MAIL
Norman Keith Burgess SCDC# 353672
Broad River Correctional Institution
4460 Broad River Road
Columbia, South Carolina 29210

RE: Norman Keith Burgess vs. State of South Carolina
Case No: 2014-CP-39-0909

Dear Norman Keith Burgess:

Please be advised that your PCR hearing is scheduled for December 14, 2015 at 9:30 a.m. at the Pickens County Courthouse.

Thank you for your consideration of this letter.

Sincerely,
LAW OFFICE OF R. MILLS ARIAIL, JR.
Attorney at Law

R. Mills Ariail

R. Mills Ariail, Jr.

RMAjr/dl

1/23/15

Dear MR. ARial, I have Received A Notice From the Pickens County Clerk of Court today stating that you are to Represent Me in My Upcoming Post-Conviction Relief Hearing CA. No. 2014CP3900 I have several things I would like to have done to Prepare for this hearing, As My Future Freedom is Dependent on it. I'm sure you know more than I do about what all needs to be done to Prepare For this - These are just the things I've come up with on my own.

1. Amend P.C.R. Application to Include Failure of Counsel to Call An expert witness on My Behalf.
2. Amend P.C.R. Application to Include Failure of Counsel to Call Key Witnesses on My Behalf - Angela Tollison and Josh Mauldin.
3. Schedule A visit to BRCI to discuss case with me.
4. File Motion For Discovery
6. Have Angela Tollison and Josh Mauldin Subpoenaed As Key Witnesses
7. If Hearing Date is too Soon, File Motion For Continuance in order to Prepare Case
8. File A Motion For State to Pay For An expert witness on My Behalf

AS I Stated These ARe Just the things Ive thought of on My own and in our Limited LAW LiBrary time, I Pray that You CAN help me Straighten Out the Injustice that hAS Been Done to Me. I LooK FoRWARd to Meeting With you and working with you on this. I will INclude A FeW CASes Ive Found thAt MAY Be helpFul.

THANK-You & God Bless You-

Respectfully SuBmitted
/s/ Norman K Burgess
NORMAN Keith Burgess SCDC#353672
B.R.C.I. - MURRAY Dorm - Rm 144
4460 Broad River Rd
ColumBia, S.C. 29210

SWORN to AND SUBSCRIBed
Before Me this 23
dAY of JANUARY, 2015
Susan H. Frye
NotARy PuBlic For South CAROLina

My Commission Expires:

My Commission Expires
MAY 12, 2018

Dear Mr. Atrail Jr.,

You asked me why I believe it's benificial to have my wife, Angela Tollison, and Josh Maw (correct spelling of his last name) to be Subpoenaed as witnesses in my case.

My wife, Angela Tollison, can testify against the statement that I had any sexual relations of any type with Melaine Shelton during the ages 14-16. My wife worked at April Valley, an assistance living home for elderly folk, ~~home~~ and she only worked on the weekends, home Monday-Friday, and would take Melaine to work with her. So, there wasn't a time I was alone with Melaine to do these things I've been convicted of. Melaine also stated in Court that we had sex only once with her mother home, when she was 19, which is when her mother caught us.

Josh Maw could testify against the statement that Melaine states I was the only person she had sex with before the child was born. Josh was her boyfriend during the time period of Melaine's

[redacted]

years of age.

Make Sure you contact both Angela and Josh regarding this information stated in this letter. Upon speaking with these individuals you will see the truth. This is the reason it's imperative that Angela and Josh be ~~subb~~ subpoenaed.

Also, Angela said, before court, she would testify but my lawyer failed to subpoena her ultimently rendering him ineffective.

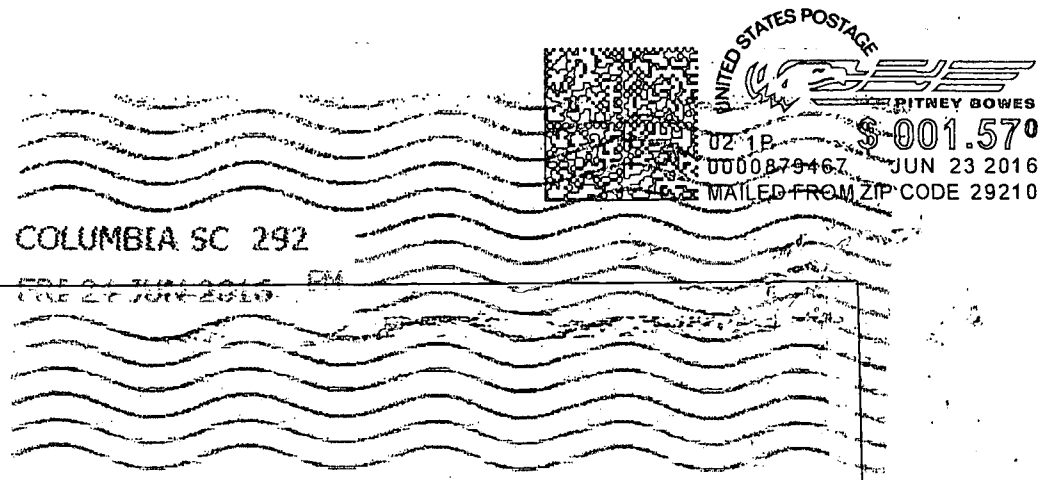
I need you to come and talk to me in person

Respectfully,
Norman Keith Burgess
Norman Keith Burgess

Sworn to and subscribed before me this 20 day of August, 2015

Notary Public for South Carolina
my Commission expires

Commission Expires
March 5, 2018



Mr. Norman Keith Burgess, #353672
Broad River Correctional Institution
Murry Unit B-236
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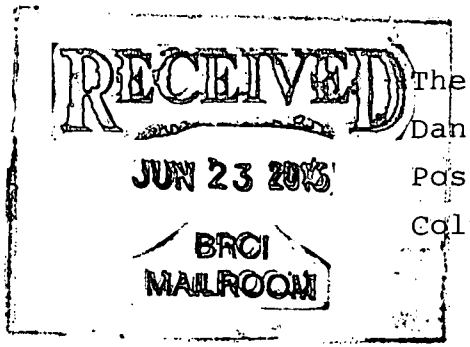

The Supreme Court Of South Carolina
Daniel E. Shearouse, Clerk Of Court
Post Office Box 11330
Columbia, South Carolina 29211

ATT: Daniel E. Shearouse,