THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

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SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Letitia H. Verdin, Circuit Court Judge

C.A. No.: 2016-001058

Justin T., a minor, by and through his parent,
Caren D. Taylor .....Appellant(s)

v.

Richland County School District One,
and Percy Mack..... Respondent(s)

FINAL BRIEF OF RESPONDENTS

CHILDS & HALLIGAN, P.A.

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I. STATEMENT OF ISSUES ON APPEAL

Issues presented by this Appeal from the order of the Honorable Letitia H. Verdin are:

1. Whether Appellant's mother may represent Appellant although she is not an attorney;
2. Whether the Circuit Court properly determined that this action should have been dismissed for lack of subject matter jurisdiction;
3. Whether the Court of Appeals should entertain Appellant's argument that the Circuit Court erred by granting Respondents' Motion to Dismiss for lack of subject matter jurisdiction without a record on appeal having been filed;
4. Whether it was Appellant's burden to provide a record on appeal;
5. Whether a certified record on appeal is necessary to the assessment of jurisdiction; and
6. Whether the Circuit Court erred by using a form order to grant Respondents' Motion to Dismiss for lack of subject matter jurisdiction.

II. STATEMENT OF THE CASE

The Respondents, Richland County School District One ("District") and former Superintendent Dr. Percy Mack, in his official capacity, respectfully submit this brief requesting the Circuit Court's order in favor of the Respondents be affirmed.

This case evolved from an expulsion hearing before the District's hearing officer on November 25, 2013. The hearing officer determined that Appellant, Justin T., violated the District's Discipline Code and, in lieu of expulsion, placed him at the Richland One Evening High School. Appellant and his family appealed the decision to the District Board of Trustees ("Board"). The Board heard the appeal on January 14, 2014, and voted to uphold the hearing officer's decision to place Appellant in Richland

One Evening High School. By letter, Appellant was notified of the Board's decision. On February 19, 2014, Alex Thomas Postic, Esq., attorney for Appellant, filed a Notice of Appeal and Certificate of Service in the Richland County Court of Common Pleas. (Notice of Appeal at R. pp.3-5.) On March 4, 2014, Mr. Postic filed an Amended Notice of Appeal. (Am. Notice of Appeal at R. pp. 6-8.)

On March 11, 2014, the Respondents filed a Motion to Dismiss pursuant to Rule 12(b)(1) and (6), SCRCP, on the grounds that the Circuit Court lacked subject matter jurisdiction over the claim. Specifically, the South Carolina Supreme Court has held that S.C. Code Ann. § 59-63-240, which allows appeals of decisions of a school board to the circuit court, only applies in cases where the decision of the Board is an actual expulsion. (Mot. to Dismiss at R. pp. 9-11.)

A hearing on the Respondents' Motion to Dismiss was heard on April 15, 2016, before the Honorable Letitia H. Verdin. Judge Verdin dismissed the claim pursuant to Rule 12(b)(1) and (6), SCRCP, because Appellant was assigned to the high school's evening program and not expelled; therefore, the court lacked subject matter jurisdiction. (Mot. To Dismiss Hearing Transcript at R. pp. 12-18.) Judge Verdin signed a form order on April 15, 2016, dismissing the appeal for lack of subject matter jurisdiction. (Order at R. p. 2.) The present appeal was filed on May 31, 2016.

III. STATEMENT OF FACTS

This matter began as a recommendation for expulsion based on Appellant allegedly committing a violation of the District's Discipline Code, Section IV (I) *Sexual Misconduct*, which includes consensual intercourse, sexual harassment, groping or indecent exposure. Appellant was charged with simple assault by the Forest Acres Police Department for the incident that occurred at A.C. Flora High School on November 19,

2013.

Further, Appellant was suspended and recommended for expulsion on November 20, 2013, by Richard McClure, Principal of A.C. Flora High School, as a result of his violation of the District's Discipline Code. The expulsion hearing before the District's hearing officer was held on Monday, November 25, 2013. The hearing officer placed Appellant at Richland One Evening High School in lieu of expulsion.

IV. STANDARD OF REVIEW

Upon review of a dismissal of an action for failure to state a claim, the appellate court applies the same standard of review implemented by the trial court. *Capital City Ins. Co. v. BP Staff Inc.*, 382 S.C. 92, 99, 674 S.E.2d 524, 528 (Ct. App. 2009); *Ashley River Properties I, LLC v. Ashley River Properties II, LLC*, 374 S.C. 271, 278, 648 S.E.2d 295, 299 (Ct. App. 2007). A motion to dismiss under Rule 12(b)(6), SCRCP for failure to state facts sufficient to state a cause of action "'is directed to the factual and legal sufficiency of the complaint . . . .'" *Woodell v. Marion School Dist. One*, 414 S.E.2d 794 (Ct. App. 1992). The circuit court may dismiss a claim when the defendant demonstrates the plaintiff's failure to state facts sufficient to constitute a cause of action in the pleadings filed with the court. *Hambrick v. GMAC Mortg. Corp.*, 370 S.C. 118, 634 S.E.2d 5 (Ct. App. 2006).

The appellate court must always take notice of the lack of subject matter jurisdiction. *Town of Hilton Head Island v. Godwin*, 370 S.C. 221, 223, 634 S.E.2d 59, 61 (Ct. App. 2006). A court's subject matter jurisdiction is that court's power to hear and determine cases of the general class to which the proceedings in question belong. *Linda Mc Co., Inc. v. Shore*, 390 S.C. 543, 703 S.E.2d 499 (2010). Every court has the power and duty to determine whether it has subject matter jurisdiction. *Bridges v. Wyandotte*

Worstead Co., 132 S.E.2d 18 (S.C. 1963). The burden rests upon Plaintiff to establish that a Court has subject matter jurisdiction to adjudicate the claims raised. *Richmond, Fredericksburg & Potomac, R.R. Co. v. United* States, 945 F.2d 765, 768 (4th Cir. 1991). The lack of subject matter jurisdiction may be raised at any time. *State v. Richburg*, 304 S.C. 162, 403 S.E.2d 315 (1991) When the court lacks subject matter jurisdiction, it must dismiss the case. Rule 12(h)(3), SCRCP.

South Carolina appellate courts have repeatedly held that subject matter jurisdiction may not be assumed to be inherent in the courts, but rather that it "depends upon the authority granted to the court by the constitution and laws of the State [and]...cannot be waived or conferred by consent." *Paschal v. Causey*, 420 S.E.2d 863, 865 (S.C. App. 1992). The question of subject matter jurisdiction is a question of law. *Chew v. Newsome Chevrolet, Inc.*, 315 S.C. 102, 431 S.E.2d 631 (Ct. App. 1993).

V. ARGUMENTS

A. Appellant's Mother May Serve As Next Friend For Her Child Justin T., But May Not Represent Justin T. And Litigate His Claims Without Counsel Because She Is Not A Licensed Attorney.

Under South Carolina law, a person may prosecute or defend "his own cause, if he so desires." S.C. Code Ann. § 40-5-80. However, no "person may either practice law or solicit the legal cause of another person or entity in this State unless he is enrolled as a member of the South Carolina Bar." S.C. Code Ann. § 40-5-310.

Under these statutes, the Supreme Court of South Carolina has held that a non-lawyer cannot represent a corporation in circuit or appellate courts. *Renaissance Enters., Inc. v. Summit Teleservices, Inc.*, 334 S.C. 649, 515 S.E.2d 257 (1999) (holding that non-lawyer president and shareholder of corporation cannot represent the corporation *pro se* in circuit or appellate courts). The Supreme Court has also held that a non-lawyer

executor or personal representative cannot represent an estate in legal matters. *Brown v. Coe*, 365 S.C. 137, 616 S.E.2d 705 (2005). The Supreme Court explained that the "goal of the prohibition against the authorized practice of law is to protect the public from incompetent, unethical, or irresponsible representation." *Renaissance Enters, Inc.* 334 S.C. at 652, 515 S.E.2d at 258. Specifically, the prohibition against the unauthorized practice of law protects the public "from the potentially severe economic and emotional consequences which may flow from the erroneous preparation of legal documents or the inaccurate legal advice given by persons untrained in the law." Brown, 365 S.C. at 139, 616 S.E.2d at 707.

While a parent may assert claims on behalf of his or her minor child as next friend, Rule 17(c), SCRCP, a non-lawyer parent serving as next friend cannot litigate a minor child's claim without legal counsel. *Meyers v. Loudoun County Pub. Sch.*, 418 F.3d 395, 400 (4th Cir. 2005) (non-attorney parent of minor children not authorized to litigate *pro se* the claim of his minor children); *Blue v. People*, 585 N.E.2d 625, 626 (Ill. Ct. App. 1992) ("A next friend is not a party to a suit but represents the real party, who, as a minor, lacks the capacity to sue in his own name."); *Yulin Li v. Rizzio*, 801 N.W.2d 351, 360 (Iowa Ct. App. 2011) (Rule authorizing father "to bring suit on behalf of his son as next friend, did not authorize [father] to advocate his son's claim before the district court without the aid of counsel."). Courts have repeatedly held that a non-lawyer parent or guardian cannot sue on behalf of his or her minor child without securing legal counsel. *Meyers v. Loudoun County Pub. Sch.*, 418 F.3d 395, 399-401 (4th Cir. 2005); *Booker v. Sullivan*, No. 8:11-1131-HMH-JDA, 2011 WL 3555718 (D.S.C. July 21, 2011); *Foley v. Town of Nichols*, No. 4:09-1217-TLW-TER, 2010 WL 424142 (D.S.C. Feb. 1, 2010); *Bardes v. Magera*, No. 2:08-CV-487-PMD-RSC, 2009 WL 3163547 (D.S.C. Sept. 30, 2009); *Cheung v. Youth Orchestra Found. of Buffalo, Inc.*, 906 F.2d 59 (2d Cir. 1990);

Osei-Afriyie v. Med. Coll. of Pa., 937 F.2d 876 (3d Cir. 1991); *Shepherd v. Wellman*, 313 F.3d 963 (6th Cir. 2002); *Navin v. Park Ridge Sch. Dist. 64*, 270 F.3d 1147 (7th Cir. 2001); *Johns v. County of San Diego*, 114 F. 3d 874 (9th Cir. 1997); *Meeker v. Kercher*, 782 F.2d 153 (10th Cir. 1986); *Gallo v. United States*, 331 F. Supp. 2d 446 (E.D. Va. 2004); *Brown v. Ortho Diagnostic Sys., Inc.*, 868 F. Supp. 168 (E.D. Va. 1994); *A ex rel. F.P.J. v. Davis*, 86 So. 3d 394 (Ala. Ct. App. 2011); *Byers-Watts v. Parker*, 18 P.3d 1265 (Ariz. Ct. App. 2001); *Lowe v. City of Shelton*, 851 A.2d 1183 (Conn. Ct. App. 2004); *Blue v. People*, 585 N.E.2d 625 (Ill. Ct. App. 1992); *Yulin Li v. Rizzio*, 801 N.W.2d 351, 360 (Iowa Ct. App. 2011); *Goodwin v. Hobza*, 762 N.W.2d 623 (Neb. Ct. App. 2009); *Chisholm v. Rueckhaus*, 948 P.2d 707 (N.M. Ct. App. 1997); and *In re D.L.*, 937 N.E.2d 1042 (Ohio Ct. App. 2010).

The purpose of the rule prohibiting non-lawyers from representing others has been explained in detail:

> The near uniform proscription on non-lawyers representing others in court is soundly based on two separate, but complementary policy considerations. First, there is a strong and compelling state interest in regulating the practice of law. Regulation that excludes non-lawyers from representing others reflects that the conduct of litigation by a nonlawyer creates unusual burdens not only for the party he represents, but also for his adversaries and the court. The lay litigant frequently files pleadings that are awkwardly drafted, motions that are inarticulately presented, [and] proceedings that are needlessly multiplicative. In addition to lacking the professional skill of a lawyer, the lay litigant lacks many of the attorney's ethical responsibilities, including, importantly, the duty to avoid litigating unfounded or vexations claims.
>
> ...
>
> The second reason unlicensed laymen are not typically permitted to represent others in court concerns the importance of what is at stake for the litigant, and the final nature of the adjudication of the rights in question. Thus, a

> party may be bound, or its rights waived, by its legal representative. When that representative is a licensed attorney there are grounds to believe that the representative's character, knowledge, and training are equal to the responsibility. In addition, remedies and sanctions are available against the lawyer that are not available against nonlawyers, including ethical misconduct sanctions and malpractice suits.

Brown v. Ortho, 868 F. Supp. at 171-72 (citations and footnotes omitted).

In this case, Appellant Justin T. was previously represented by legal counsel in the Circuit Court proceedings. However, Caren Taylor, Justin T.'s mother, has appealed to this Court *pro se.* Ms. Taylor has brought this underlying action solely in a representative capacity; she has not raised any claims of her own. Accordingly, the party in interest in the underlying action and the aggrieved party to this appeal is Appellant Justin T., not his mother. Ms. Taylor, by whom this suit was brought by and through, is neither technically nor substantially the party to this proceeding. It is Respondents' understanding that Ms. Taylor is not an attorney licensed in South Carolina, and thus, lacks the authority to litigate Justin T's claims without legal counsel.

B. The Circuit Court Properly Granted Respondents' Motion To Dismiss For Lack Of Subject Matter Jurisdiction.

Under well-established South Carolina law, student suspensions are not subject to appeal to Circuit Court. The South Carolina Supreme Court considered this particular issue in *Davis v. School District of Greenville County.*, 374 S.C. 39, 43, 647 S.E.2d 219, 222 (2007). With regard to appeals of transfers to alternative schools in lieu of expulsion, the Court held that transfers of students are governed by S.C. Code Ann. § 59-63-250, which provides:

> The Board or a designated administrator may transfer a pupil to another school in lieu of suspension or expulsion

> but only after a conference or hearing with the parents or legal guardian. The parents or legal guardian may appeal a transfer made by an administrator to the board.

The limited appeal provisions of *Davis* apply despite the fact that the matter began as a recommendation for expulsion. In *Davis*, the student was also initially recommended for expulsion. The District ultimately decided to assign the student to an alternative school in lieu of expulsion, as was done with Appellant in this matter. In response to *Davis*, the Court held:

> Respondent contends, however, that because the proceedings began as expulsion proceedings, and the procedure initially followed by the District was pursuant to the expulsion statute, *see* § 59-63-240, he retains the full appellate rights outlined in that statutory section. Respondent further maintains that because the statutory language provides that the 'action of the board may be appealed to the proper court'-without regard to whether the action resulted in an actual expulsion-the circuit court properly found it had the power to review the Board's action in this case. We disagree.

Similarly, in this case, although the Appellant's case began as a recommendation for expulsion, because that recommendation ultimately was rejected, the decision to transfer him in lieu of expulsion is not appealable.

The court in *Davis* further held that:

> Section 59-63-250 expressly provides for discipline in the form of a transfer 'in lieu of suspension or expulsion'; therefore, it plainly envisions the possibility that the student may be involved in expulsion proceedings prior to being transferred. The statute then specifically provides for only one level of appeal. Had the Legislature intended for a transferred student to have all the rights outlined in the expulsion statute, it could have provided specifically for that procedure in section 59-63-250. We therefore hold the Legislature intended that when a student is merely transferred, and not expelled, the review of the decision ends with the Board. See §59-63-250; *Hodges v. Rainey,*

> *supra* (the cardinal rule of statutory construction is to ascertain and effectuate the intent of the Legislature).
>
> Indeed, a contrary interpretation would create a significant conflict between sections 59-63-240 and 59-63-250, allowing further appellate review of a transfer if the proceedings were initiated under the expulsion statute, but not of a transfer initiated under the transfer statute. *Hodges v. Rainey, supra* (statutes should be harmonized whenever possible to prevent an interpretation that would lead to a result that is plainly absurd); *see also Aledo Indep. Sch. Dist. v. Reese*, 987 S.W.2d 953, 958 (Tex. App. 1999) (where the court held that a student's transfer to an alternative education program was not an expulsion, in part because the applicable statutes provided no district court review for alternative placements but allowed further court review for expulsions). Thus, once the hearing officer rejected expulsion and imposed the sanction of transfer, the transfer statute became applicable. That section's appellate procedure simply does not provide for appeal of the Board's decision to the circuit court. *See* 59-63-250. Accordingly, the circuit court lacked subject matter jurisdiction to review the Board's decision.

For the above-stated reasons, Respondents submit that the Circuit Court lacked subject matter jurisdiction in this matter, and accordingly, the order dismissing the appeal was proper. Further, to the extent this Court's jurisdiction derives from the Circuit Court, where the Circuit Court does not have jurisdiction to determine the merits, the Court of Appeals likewise does not have jurisdiction to reach the merits and this appeal should be dismissed.

C. Appellant's Arguments Were Not Raised In Circuit Court And Cannot Be Raised For The First Time On Appeal.

As an initial matter, Appellant failed to argue in the lower court that: (1) the Respondents failed to file a certified record on appeal; (2) that the Respondents had a mandatory duty to certify and file the original record from the Board to the Richland County Clerk of Court; and (3) the Appellant's right to due process of law under the

Fourteenth Amendment to the United States Constitution was violated when the Respondents failed to certify the record on appeal and file it in the Circuit Court. These arguments may not be raised for the first time on appeal. Specifically,

> An issue cannot be raised for the first time on appeal, but must have been raised to and ruled upon by the trial judge to be preserved for appellate review. An issue is not preserved where the trial court does not explicitly rule on an argument and the appellant does not make a Rule 59(e) motion to alter or amend the judgment.

Jones v. State Farm Mut. Auto Ins. Co., 364 S.C. 222, 612 S.E.2d 719 (Ct. App. 2005); *Floyd v. Floyd*, 365 S.C. 56, 73, 615 S.E.2d 465, 474 (Ct. App. 2005) ("[W]hen a trial judge makes a general ruling on an issue, but does not address the specific argument raised by the appellant and the appellant does not make a motion to alter or amend pursuant to Rule 59(e), SCRCP to obtain a ruling on the argument, the appellate court cannot consider the argument on appeal."); *Noisette v. Ismail*, 304 S.C. 56, 58, 403 S.E.2d 122, 124 (1991) (holding that where a trial court does not explicitly rule on an argument raised, and appellant makes no Rule 59(e), SCRCP motion to obtain a ruling, the appellate court may not address the issue).

This well-settled rule establishes that questions presented for this Court's review that were not raised and ruled upon in the trial court should not be considered on appeal. Accordingly, Appellant's arguments, including but not limited to, the absence of certified record on appeal should be disregarded because the issues were neither raised before nor ruled upon by the Circuit Court, and accordingly, it should not now be addressed by this Court. *See USAA Property and Cas Ins. Co. v. Clegg*, 377 S.C. 643, 660, 661 S.E.2d 791, 800 (2008); *Food Mart v. South Carolina Dept. of Health & Envtl. Control*, 322 S.C. 232, 234, 471 S.E.2d 688, 689 (1996); *Kiawah Resort Assc. v. South Carolina Tax*

Com'n, 318 S.C. 502, 505, 458 S.E.2d 542, 544 (1995).

D. Appellant Had The Burden To Certify The Record On Appeal.

As a general rule, Appellant bears the burden of presenting an appellate court with an adequate record. *Johnson v. Sam English Grading, Inc.*, 412 S.C. 433, 454, 772 S.E.2d 544, 555 (Ct. App. 2015); *Solley v. Navy Federal Credit Union, Inc.*, 397 S.C. 192, 213, 723 S.E.2d 597,609 (Ct. App. 2012); *McCall v. Ikon*, 380 S.C. 649, 663, 670 S.E.2d 695, 703 (Ct. App. 2008). South Carolina courts have held that it is an Appellant's burden to include in the record on appeal such parts of the proceedings as he deems necessary. *Town of Winnsboro v. Wiedeman-Singleton, Inc.*, 303 S.C. 52, 61, 398 S.E.2d 500, 505 (Ct. App. 1990); *Cogdill v. Watson*, 289 S.C. 531, 347 S.E.2d 126 (Ct. App. 1986); *Hamilton v. Greyhound Lines East*, 281 S.C. 442, 316 S.E.2d 368 (1984).

In this instant case, the burden was upon Appellant, who appealed the Board's decision to the Circuit Court, to furnish a record on appeal to the Circuit Court. Further, Appellant is required to provide a record on appeal to this Court; however, the record shall not include matters which were not presented to the lower court. Rule 210(c), SCRCP Record on Appeal provides:

> [t]he Record on Appeal shall include all matters designated to be included by any party under Rule 209 and shall comply with the requirements of Rule 267. The Record shall not, however, include matter which was not presented to the lower court or tribunal.

As set forth above, Appellant had the burden of providing the record on appeal to the Circuit Court. Appellant failed to meet the burden and has attempted to shift that burden upon Respondents. Further, to the extent Appellant failed to certify a record on appeal to the Circuit Court, Appellant may not now include in the record matters which

were not presented to the Circuit Court. Rule 210(c) and (h), SCRCP.

Overall, because Appellant created the procedural defect in the appeal, the Circuit Court's Order granting the Motion to Dismiss should not be disturbed and Appellant's argument that his constitutional right to due process was violated when the Respondents failed to certify the record on appeal and file it with the Circuit Court should be disregarded.

E. The Record On Appeal Is Not Necessary To The Assessment Of Jurisdiction.

As a matter of law, lack of subject matter jurisdiction can be raised at any time, even for the first time on appeal, by a party or by the court. *Ex parte Cannon*, 385 S.C. 643, 654, 685 S.E.2d 814, 820 (Ct. App. 2009). Generally, in considering a Rule 12(b)(6), SCRCP motion, the trial court must base its ruling solely upon allegations set forth in the Complaint. *See Flateau v. Harrelson*, 355 S.C. 197, 201, 584 S.E.2d 413, 415 (Ct. App. 2003). Assuming, *arguendo*, that Respondents were required to provide a certified record on appeal, a certified record on appeal is not necessary to determine lack of subject matter jurisdiction. When a defendant challenges subject matter jurisdiction via a motion to dismiss for lack of subject matter jurisdiction, the district court may regard the pleadings as mere evidence on the issue and may consider evidence outside the pleadings without converting the proceedings to one for summary judgment. *Velasco v. Gov't of Indonesia*, 370 F.3d 392, 398 (4th Cir. 2004); *Evans v. B.F. Perkins Co. a Div. of Standex Intern Corp.*, 166 F.3d 642, 647 (4th Cir. 1999). Affidavits and other evidence outside of the pleadings may, in certain circumstances, be considered in support of a motion to dismiss based on a lack of subject matter jurisdiction. *Baird v. Charleston Cnty*, 333 S.C. 519, 529, 511 S.E.2d 69, 74 (1999). As such, the Circuit Court was not

required to review the record on appeal to ascertain jurisdiction. Rather, the Circuit Court had the discretion to make its decision based on the information provided to the court during the motions hearing. Therefore, Appellant's argument that the Circuit Court erred by granting Respondents' Motion to Dismiss in the absence of a record on appeal is misguided.

F. The Circuit Court's Use Of A Form Order Was Proper.

Appellant argues that the Circuit Court erred by using only a form order to set forth its judgment. However, this Court has held that

> Not all situations require a detailed order, and the trial court's form order may be sufficient if the appellate court can ascertain the basis for the trial court's ruling from the record on appeal; there is no blanket requirement that the trial court set forth a separate explanation on all of its rulings.

Porter v. Labor Dept., 372 S.C. 560, 567, 643 S.E.2d 96, 100 (Ct. App. 2007).

The Circuit Court's form order ruling that it lacked subject matter jurisdiction in this case was proper because the student had not been expelled. The Court generally does not intervene in school decisions; however, based on the arguments made by counsel during the motions hearing, it was able to perform its designated duty, and thus, a detailed order was not required.

Assuming, *arguendo*, that this Court cannot determine whether granting the Motion to Dismiss was appropriate because the Circuit Court's order fails to articulate its reasoning for granting the motion to dismiss, the Circuit Court articulated its decision during the Motion to Dismiss hearing and can be reviewed in the hearing transcript. The hearing transcript also provides this Court with a foundation for confirming the Circuit Court's basis for granting Respondents' Motion to Dismiss.

VI. CONCLUSION

For the foregoing reasons, Respondents respectfully request the Court to affirm the judgment of the Circuit Court.

Respectfully submitted,

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By: _____

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CERTIFICATE OF COUNSEL

The undersigned certifies that this Final Brief complies with Rule 211(b), SCACR.

January 25, 2017

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served Respondents' Final Brief by depositing a copy of the same in the U.S. Mail service, postage prepaid and addressed as follows:

Ms. Caren D. Taylor
2139 Oak Street
Columbia, SC 29204

This 25 day of January, 2017.

CHILDS & HALLIGAN, P.A.

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