STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2016-000670

RECEIVED
MAR 24 2017
SC Court of Appeals

THE STATE,

Respondent,

v.

JAMES ARCHIE CREWS, IV,

Appellant.

INITIAL BRIEF OF RESPONDENT

ALAN WILSON
Attorney General

MEGAN HARRIGAN JAMESON
Assistant Attorney General
S.C. Bar No. 100108

Post Office Box 11549
Columbia, South Carolina 29211
(803) 734-3727

DAVID M. PASCOE, JR.
Solicitor, First Judicial Circuit

140 N. Main Street, Suite 102
Summerville, South Carolina 29483
(843) 871-2640

ATTORNEYS FOR RESPONDENT

TABLE OF CONTENTS

TABLE OF AUTHORITIES ii

STATEMENT OF ISSUES ON APPEAL 1

STATEMENT OF THE CASE 2

STATEMENT OF FACTS 3

ARGUMENT 7

Following our Supreme Court's decision in State v. Stukes, 416 S.C. 493, 787 S.E.2d 480 (2016), which was reached after Appellant's trial, any error stemming from the trial court charging the jury pursuant S.C. Code Ann. § 16-3-657 regarding non-corroboration was an insubstantial error not affecting the result of Appellant's trial and is therefore harmless. 7

CONCLUSION 14

TABLE OF AUTHORITIES

Cases

Calderon v. California, 525 U.S. 141 (1998) 13
State v. Bailey, 298 S.C. 1, 377 S.E.2d 581 (1989) 10
State v. Cheeks, 401 S.C. 322, 737 S.E.2d 480 (2013) 12
State v. Collins, 266 S.C. 566, 225 S.E.2d 189 (1976) 12
State v. Fletcher, 379 S.C. 17, 664 S.E.2d 480 (2008) 9, 12
State v. Haselden, 353 S.C. 190, 577 S.E.2d 445 (2003) 9
State v. Jenkins, 412 S.C. 643, 773 S.E.2d 906 (2015) 12
State v. McBride, 416 S.C. 379, 786 S.E.2d 435 (Ct. App. 2016) 8, 9, 11
State v. Northcutt, 372 S.C. 207, 641 S.E.2d 873 (2007) 9
State v. Rayfield, 369 S.C. 106, 631 S.E.2d 244 (2006) 7
State v. Schumpert, 312 S.C. 502, 435 S.E.2d 859 (1993) 7
State v. Stukes, 416 S.C. 493, 787 S.E.2d 480 (2016) ..... i, 1, 7, 8, 12
State v. Tench, 353 S.C. 531, 579 S.E.2d 314 (2003) 12
State v. Thorne, 237 S.C. 248, 116 S.E.2d 854 (1960) 12
State v. Wiley, 387 S.C. 490, 692 S.E.2d 560 (Ct. App. 2010) 10
State v. Wyatt, 317 S.C. 370, 453 S.E.2d 890 (1995) 13
United States v. Hastings, 461 U.S. 499 (1983) 13

Statutes

S.C. Code Ann. § 16-3-657 ..... i, 1, 4, 5, 7, 9
S.C. Const. art. V, § 21 ..... 8, 11

Rules

Rule 601, SCRE 11

Other Authorities

32 S.C. Jur. Witnesses § 6 11

STATEMENT OF ISSUES ON APPEAL

Following our Supreme Court's decision in State v. Stukes, 416 S.C. 493, 787 S.E.2d 480 (2016), which was reached after Appellant's trial, any error stemming from the trial court charging the jury pursuant S.C. Code Ann. § 16-3-657 regarding non-corroboration was an insubstantial error not affecting the result of Appellant's trial and is therefore harmless.

STATEMENT OF THE CASE

During its December 2015 term, the Dorchester County Grand Jury indicted Appellant James Archie Crews, IV for first-degree criminal sexual conduct with a minor following an investigation into allegations he orally and anally penetrated his nine-year-old stepson (Victim). On March 14, 2016, Appellant proceeded to a jury trial in the Dorchester County Court of General Sessions with the Honorable Diane S. Goodstein, circuit court judge, presiding. On March 18, 2016, the jury convicted Appellant as indicted. Judge Goodstein sentenced Appellant to life imprisonment. Thereafter, Appellant filed a timely notice of appeal.

STATEMENT OF FACTS

In November of 2013, Victim's mother and Appellant were experiencing marital discord over Appellant's desires to dress as a woman and had recently separated while still living in the same home. (Tr. 227-29, 235). On November 12, 2013, Appellant asked Victim's mother if she would be willing to work on their marriage and then left the home to go to school. (Tr. 138, 227-29). Once Appellant left, Victim, who was nine years old at the time, approached his mother and asked to speak with her. (Tr. 138, 228-29). Victim revealed to his mother Appellant had been sexually assaulting him; specifically, Appellant had been orally and anally penetrating him with his penis. (Tr. 138, 229). Victim's mother began crying and called the police along with Victim's father. (Tr. 138, 229-30, 235). She next took Victim and his older sister to the Summerville Police Department. (Tr. 230, 235).

Two days later, Victim, accompanied by his father, went to the Dorchester County Children's Center for a physical examination and a forensic interview. (Tr. 139). Victim's physical examination was performed by Ashleigh Benda, a register nurse practitioner with specialized training in child abuse pediatrics. (Tr. 245-50). Victim's father gave Benda her son's medical background before she started her physical examination of Victim. (Tr. 250-51). During the physical examination, Benda noted Victim was very shy, nervous, and timid and wanted to keep his body covered. (Tr. 252). Victim initially reported that Appellant had touched him inappropriately, but eventually told Benda that Appellant had orally and anally penetrated him. (Tr. 253-54). Benda did not find any physical signs of sexual abuse, which is common for juvenile male victims of sexual assault—especially if the last instance of abuse was more than seventy-two hours prior to the examination . (Tr. 253-57).

On November 14, 2013, Victim also participated in a forensic interview at the Dorchester County Children's Center with Millicent Walker. (Tr. 320, State's Ex. No. 4). During this videotaped forensic interview, Victim disclosed Appellant had orally and anally penetrated him several times, with the last instance of abuse occurred on October 31, 2013. (State's Ex. No. 4). Victim described some of the instances of abuse to Walker, including where in the home the abuse occurred and Appellant's conduct before, during, and after the abuse. (State's Ex. No. 4).

Appellant was arrested and indicted for first-degree criminal sexual conduct with a minor. Appellant proceeded to a jury trial on March 14, 2016. Victim testified Appellant had been sexually abusing him multiple times a week for as long as he could remember. (Tr. 133, 157). Victim testified Appellant would frequently orally and anally penetrate him with his penis, as well as occasionally have Victim perform oral and anal sex on him. (Tr. 122-25, 147, 164). Victim reported that the abuse happened when his mother was not home and typically occurred in his sister's bedroom, which faced the driveway, but also happened on the living room couch, in the shed, and once in the bathroom while Appellant was taking a bath. (Tr. 122, 131-33). Victim also recounted that Appellant wore a short, cheetah-pattered dress-type garment during some of the sexual encounters. (Tr. 137-38). Appellant told Victim to keep it a secret, and Victim complied and participated in the abuse out of fear. (Tr. 125, 155). Victim testified his sister often saw the abuse. (Tr. 164). However, his sister was not called as a witness at trial.

At the conclusion of the evidentiary portion of the trial, the State requested a non-corroboration jury charge pursuant to Section 16-3-657. (Tr. 338). Appellant objected to the instruction and the trial court instructed Appellant to object after the charge was given to preserve the issue for appellate review. (Tr. 338).

During its jury charge, the trial court gave the following instruction pertaining to how the jury should evaluate the credibility of juvenile witnesses:

> Now, during this trial you heard testimony from a child.[1] Where a witness is a child you must determine as with any witness whether that testimony is believable. In deciding believability you may consider not only matters that I have already discussed with you, but you may also consider the age of the child, the child's ability to observe and remember facts and the child's ability to understand and answer questions. Because young children may not fully understand what is happening here, it is up to you to decide whether the child understood the seriousness of appearing as a witness at this criminal trial, whether the child understood the questions, whether the child has a good memory, and whether the child understands the difference between lying and telling the truth.
>
> In addition, young children may be influenced by the way the questions are asked. It is up to you to decide whether the child understood the questions asked.

(Tr. 396-97).

Immediately after that instruction was given, the trial court instructed the jury regarding non-corroboration of a victim's testimony pursuant to Section 16-3-657:

> Now, ladies and gentlemen, I further charge you that the testimony of the victim need not be corroborated in prosecutions under Sections 16-3-652 through 16-3-658 and I further charge you that this offense is alleged to be a violation of Section 16-3-655.

(Tr. 398).

Following the conclusion of all jury instructions, Appellant objected to the non-corroboration charge, arguing it would confuse the jury. (Tr. 406-07). The trial court denied Appellant's objection. (Tr. 407). Thereafter, deliberations began at 12:12 p.m. (Tr. 407-08).

After nearly forty minutes of deliberation, the jury sent the trial court a note inquiring as to whether either the State or defense counsel could have called Victim's sister as a witness. (Tr.

[1] Notably, the only juvenile witness who testified during trial was Victim.

408, Court's Ex. No. 4). The trial court responded the jury had all the information necessary to make its decision. (Tr. 408, Court's Ex. No. 4). The jury next asked to watch the forensic interview again and the jury was called back into the courtroom to watch the video. (Tr. 408-10, Court's Ex. No. 5). The jury reached its verdict at 2:26 p.m., convicting Appellant of first-degree criminal sexual conduct with a minor. (Tr. 411-12).

ARGUMENT

Following our Supreme Court's decision in State v. Stukes, 416 S.C. 493, 787 S.E.2d 480 (2016), which was reached after Appellant's trial, any error stemming from the trial court charging the jury pursuant S.C. Code Ann. § 16-3-657 regarding non-corroboration was an insubstantial error not affecting the result of Appellant's trial and is therefore harmless.

During its jury charge, the trial court instructed the jury that the victim's testimony in a first-degree criminal sexual conduct with a minor case need not be corroborated.[2] Specifically, the trial court charged:

> Now, ladies and gentlemen, I further charge you that the testimony of the victim need not be corroborated in prosecutions under Sections 16-3-652 through 16-3-658 and I further charge you that this offense is alleged to be a violation of Section 16-3-655.

(Tr. 398). At the time of Appellant's trial, this particular jury instruction had been deemed an appropriate charge consistent with the legislature's remedial intent pursuant to the Supreme Court's decision in State v. Rayfield, 369 S.C. 106, 117-18, 631 S.E.2d 244, 250 (2006).

Less than two months after Appellant's trial, the Supreme Court determined the statutory non-corroboration charge was confusing and unconstitutional in State v. Stukes, 416 S.C. 493, 787 S.E.2d 480 (2016). In that case, the trial court instructed the jury on the statutory non-corroboration language from S.C. Code Ann. § 16-3-657. During its deliberations, the jury sent the trial court a note, asking: "[T]he South Carolina law that the victim's testimony in CSC . . . does not need to be corroborated, . . . does that law imply that the victim's testimony must be accepted as being true?" Rather than respond directly to the jury's question, the trial court recharged the general law on credibility. The jury immediately returned a guilty verdict. Stukes, 416 S.C. at 497, 787 S.E.2d at 482. On appeal, the Supreme Court concluded the non-corroboration charge was "confusing and violative of the constitutional provision prohibiting

[2] S.C. Code Ann. § 16-3-657 provides: "The testimony of the victim need not be corroborated in prosecutions under §§ 16-3-652 through 16-3-658." Instructing the jury on this statute was first found acceptable in State v. Schumpert, 312 S.C. 502, 435 S.E.2d 859 (1993).

courts from commenting to the jury on the facts of a case." Id. at 493, 787 S.E.2d at 483 (citing S.C. Const. art. V, § 21 ("Judges shall not charge juries in respect to matters of fact, but shall declare the law.")). The Court further instructed:

> [I]t is not within the province of the court to express an opinion to the jury on its view of the facts. By addressing the veracity of a victim's testimony in its instructions, the trial court emphasizes the weight of that evidence in the eyes of the jury. The charge invites the jury to believe the victim, explaining that to confirm the authenticity of her statement, the jury need only hear her speak.

Id. The Supreme Court observed "it is inescapable that this charge confused the jury" as "illustrated by the jury's query as to whether our law implies a victim's testimony **must** be accepted as being true." Id. at 499, 787 S.E.2d at 483 (emphasis in original).

Addressing the trial court's reaction to the jury note, the Supreme Court explained, "In our view the trial court's decision to merely recharge credibility, as opposed to answer the question in the negative, did nothing to inform the jury on this issue." Id. Reviewing for harmless error, the Supreme Court found the instruction was prejudicial because "th[e] case hinged on credibility. [The v]ictim said it was rape; [the defendant] said it was consensual." Id.

Weeks later, this Court addressed the propriety of the statutory non-corroboration charge in State v. McBride, 416 S.C. 379, 394, 786 S.E.2d 435, 442 (Ct. App. 2016). Referencing the Supreme Court's recent decision in Stukes, this Court agreed the charge was erroneous. Id. However, this Court found the error harmless beyond a reasonable doubt and declined to grant McBride a new trial. Id. This Court reasoned:

> "[u]nlike the situation in Stukes, there was corroborating evidence in this case. The victim's mother testified she smelled men's cologne and saw the stain on the victim's shirt. The mother's sister testified she confronted McBride and he said he did not mean to do it, and "tr[ied] to compromise with [her]." The sister described it as McBride's confession. Thus, although the jury was erroneously

> charged section 16–3–657, we find the error was harmless beyond a reasonable doubt.

Id.

In the present case, Appellant asserts the trial court's non-corroboration charge is unconstitutional in light of Stukes and constitutes reversible error entitling him to a new trial. Appellant argues this error cannot be harmless because the State's case hinged entirely on the minor victim's credibility without any corroborating evidence. Furthermore, Appellant contends the minor victim's trial testimony "differed significantly" from his prior sworn testimony and forensic interview, thereby heightening the prejudicial effect of the trial court's erroneous charge. Appellant concludes the jury was left with only one option—to convict Appellant of first-degree criminal sexual conduct with a minor—based on the trial court's non-corroboration charge. While the State is not disputing Appellant's assertion that the trial court's jury instruction was erroneous in light of the subsequently-issued Stukes decision, under the specific facts and circumstanced of Appellant's case, any error that resulted from the presentation of the non-corroboration charge was harmless beyond a reasonable doubt and did not render Appellant's trial so fundamentally unfair as to warrant a new trial.

Importantly, after an error is discovered, an appellate court must determine whether the error was harmless before reaching a decision in a criminal appeal. See State v. Northcutt, 372 S.C. 207, 217, 641 S.E.2d 873, 878 (2007) ("Determining the trial judge committed error is the first step of our analysis. Next we must determine whether the error was harmless."). An error is considered to be harmless beyond a reasonable doubt if it does not contribute to the verdict. State v. Fletcher, 379 S.C. 17, 25, 664 S.E.2d 480, 484 (2008). The harmlessness of an error generally depends on the materiality of the error in relation to the case as a whole. State v. Haselden, 353 S.C. 190, 196, 577 S.E.2d 445, 448 (2003). "No definite rule of law governs this finding; rather,

the materiality and prejudicial character of the error must be determined from its relationship to the entire case." State v. Wiley, 387 S.C. 490, 497, 692 S.E.2d 560, 564 (Ct. App. 2010). Critically, appellate courts will generally not set aside a judgment based on insubstantial errors not affecting the result. State v. Sherard, 303 S.C. 172, 176, 399 S.E.2d 595, 597 (1991); see State v. Bailey, 298 S.C. 1, 5, 377 S.E.2d 581, 584 (1989) ("When guilt has been conclusively proven by competent evidence such that no other rational conclusion can be reached, the Court should not set aside a conviction because of insubstantial errors not affecting the result.").

Here, any error resulting from the trial court's decision to instruct the jury on the statutory non-corroboration language was harmless because it could not have had any impact on the verdict. Initially, the jury's inquiry as to whether Victim's sister would or could have testified establishes the jury was considering (and perhaps searching for) corroboration to support Victim's testimony, which demonstrates the jury thoroughly evaluated the credibility of the Victim's testimony—including in regard to whether it was sufficiently corroborated—even after being presented with the non-corroboration charge. See Court's Ex. No. 4. In light of that fact, it is illogical to assume that the non-corroboration charge would have resulted in the jury's guilty verdict. Beyond that key factor, the present case is highly distinguishable from Stukes, where the jury was clearly confused and appeared to "inescapably" misunderstand the instruction based on its note to the trial court. Unlike the jury in Stukes, the jury in Appellant's case did not send a question expressing confusion over the non-corroboration instruction, but rather, appeared to ignore the instruction altogether based on the jury note it did submit, which appeared to question the absence of testimony that could have potentially corroborated Victim's claims of sexual abuse. Similarly, aspects of Victim's testimony were corroborated, including Appellant dressing in female clothing. Moreover, aside from the testimony and evidence presented by the State,

Appellant—unlike the defendant in Stukes—elected **not** to testify in his own defense during his trial, did not refute Victim's testimony about what had occurred, and did not offer any explanation or theory in regard to why Victim would fabricate a claim of repeated sexual assaults. Therefore, in this case, unlike in Stukes, the non-corroboration charge was harmless beyond a reasonable doubt and reversal is not warranted. See McBride, 416 S.C. at 394, 786 S.E.2d at 442 (finding any error in the trial court's non-corroboration charge was harmless).

Furthermore and most importantly, any purported prejudice Appellant suffered from the trial court's non-corroboration instruction was significantly outweighed and effectively eliminated by the enormous benefit Appellant derived from the trial court's presentation of an extensive improper charge on evaluating the credibility of juvenile witnesses, which encouraged the jury to give heightened scrutiny to the testimony of Victim, who was the lone juvenile witness to testify during trial. This improper charge, which the trial court gave **directly before** the non-corroboration charge, singled out Victim and conveyed to the jury that his testimony should be more heavily scrutinized than all the other witnesses who testified at trial. In particular, this charge suggests juvenile witnesses are less likely to remember things accurately, are less likely to know the difference between a truth and a lie, are less likely to appreciate the seriousness of the proceedings, and are more easily lead. This charge is a misleading and incorrect statement of law as these are issues that could potentially plague all witnesses regardless of their age.[3] Moreover, by commenting on the veracity of juvenile witnesses, the trial court erroneously gave an impermissible and unconstitutional charge on the facts that invaded the province of the jury. See S.C. Const. art. V, § 21 ("Judges shall not charge juries in respect to

[3] Notably, juvenile witnesses are presumed to be competent like any other witness in South Carolina unless a showing to the contrary is made. See Rule 601, SCRE ("Every person is competent to be a witness except as otherwise provided by statute or these rules."); see also 32 S.C. Jur. Witnesses § 6 ("Under the current rule, children are presumed to be competent unless it is shown otherwise.").

matters of fact, but shall declare the law."); Stukes, 416 S.C. at 499, 787 S.E.2d at 483 ("[I]t is not within the province of the court to express an opinion to the jury on its view of the facts. By addressing the veracity of a victim's testimony in its instructions, the trial court emphasizes the weight of that evidence in the eyes of the jury."); State v. Cheeks, 401 S.C. 322, 329, 737 S.E.2d 480, 484 (2013) ("[W]e hold that the 'strong evidence' charge is improper as an expression of the judge's view of the weight of certain evidence."); State v. Collins, 266 S.C. 566, 225 S.E.2d 189 (1976) ("Any further instruction on [whether the witness is fearful of retribution or has any hope of leniency from the prosecution] might have invaded the province of the jury to draw inferences from the evidence."); State v. Thorne, 237 S.C. 248, 251, 116 S.E.2d 854, 855 (1960) ("The Judge must be careful to avoid expressing, or even intimating, any opinion, as to the facts, and if he does so, whether intentionally or unintentionally, a new trial must be granted. Under our Constitution the jury is the exclusive judge of the facts, and the true meaning and real object is that the jury must be left to form its own judgment, unbiased by any expressions, or even intimations, of opinion by the Judge."). In light of the vast benefit Appellant received from the trial court's unconstitutional charge pertaining to the credibility of juvenile witnesses, any error stemming from the court's non-corroboration charge is harmless beyond a reasonable doubt.

Accordingly, based on the foregoing, the trial court's presentation of a jury instruction on the statutory non-corroboration language could not have had any impact on the outcome of Appellant's case. See Fletcher, 379 S.C. at 25, 664 S.E.2d at 484 ("Error is harmless beyond a reasonable doubt where it did not contribute to the verdict obtained."); see also State v. Tench, 353 S.C. 531, 537, 579 S.E.2d 314, 317 (2003) ("Given the abundant evidence of Tench's guilt, we find any error in admission of the seized items clearly harmless beyond a reasonable doubt."); cf. State v. Jenkins, 412 S.C. 643, 651-653, 773 S.E.2d 906, 910-911 (2015) (concluding any

error resulting from the admission of DNA evidence linking Jenkins's to a sexual assault to be entirely harmless and rejecting a conclusion "the case boiled down to a credibility contest" in light of the fact the victim's account of the sexual assault was supported by abundant independent evidence, including testimony regarding the victim's injuries, the presence of semen in the victim's body, the condition of the victim's home following the reported assault, the fingerprint evidence connecting Jenkins to the victim's home, the discovery of Jenkins in close proximity to the victim's home, and the victim's positive identification of Jenkins as her attacker). As a result, any error in the presentation of the recently-invalidated statutory non-corroboration jury instruction was entirely harmless in Appellant's case, and Appellant did not sustain actual prejudice from its presentation to the jury such that the harsh remedy of a reversal of his convictions was warranted on appeal. See United States v. Hastings, 461 U.S. 499, 509 (1983) ("[T]he [United States Supreme] Court has consistently made clear it is the duty of a reviewing court to consider the trial record as a whole and to ignore errors that are harmless, including most constitutional violations[.]"); see also Calderon v. California, 525 U.S. 141, 146 (1998) ("The social costs of retrial or resentencing are significant. . . . The State is not to be put to this arduous task based on mere speculation that the defendant was prejudiced by trial error; the court must find that the defendant was actually prejudiced by the error." (citations omitted)); State v. Wyatt, 317 S.C. 370, 372, 453 S.E.2d 890, 891 (1995) ("While we agree there was error, appellant cannot show sufficient prejudice from it to warrant reversal."). Appellant's convictions should be affirmed.[4]

[4]If this Court should grant Appellant a new trial based on the unconstitutional nature of the non-corroboration charge, this Court should also declare the trial court's credibility of juvenile witnesses unconstitutional and bar its use during Appellant's retrial or any other future trials.

CONCLUSION

For all the foregoing reasons, this Court should affirm the judgment and conviction of the lower court.

Respectfully submitted,

ALAN WILSON
Attorney General

MEGAN HARRIGAN JAMESON
Assistant Attorney General
S.C. Bar No. 100108

DAVID M. PASCOE, JR.
Solicitor, First Judicial Circuit

140 N. Main Street, Suite 102
Summerville, South Carolina 29483
(843) 871-2640

BY: Megan Harrigan Jameson
Megan Harrigan Jameson

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

ATTORNEYS FOR RESPONDENT

March 24, 2017

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2016-000670

RECEIVED
MAR 24 2017
SC Court of Appeals

THE STATE,

Respondent,

v.

JAMES ARCHIE CREWS, IV,

Appellant.

PROOF OF SERVICE

I, Megan Harrigan Jameson, certify that I have served the within Initial Brief of Respondent and Designation of Matter on Appellant by depositing two copies of the same in the United States mail, postage prepaid, addressed to:

Susan B. Hackett, Esquire
S.C. Commission on Indigent Defense – Appellate Division
PO Box 11589
Columbia, South Carolina 29211

I further certify that all parties required by Rule to be served have been served.

This 24th day of March 2017.

Megan Harrigan Jameson

Megan Harrigan Jameson
Assistant Attorney General
S.C. Bar No. 100108

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

ALAN WILSON
ATTORNEY GENERAL

March 24, 2017

RECEIVED
MAR 24 2017
SC Court of Appeals

Susan B. Hackett, Esquire
S.C. Commission on Indigent Defense – Appellate Division
PO Box 11589
Columbia, South Carolina 29211

RE: State v. James Archie Crews, IV – Appellate Case No. 2016-000670

Dear Ms. Hackett:

I am enclosing two copies of the Initial Brief of Respondent and Designation of Matter in the above-referenced case.

Sincerely,

Megan Harrigan Jameson
Assistant Attorney General
S.C. Bar No. 100108

MHJ/

Enclosures

cc: The Honorable Jenny A. Kitchings (original and one enclosed)
Victim Services