

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM BERKELEY COUNTY  
COURT OF GENERAL SESSIONS

THE HONORABLE KRISTI LEA HARRINGTON, CIRCUIT COURT JUDGE

Case No. 2017-GS-08-1190

State of South Carolina,

Respondent,

v.

Lawrence Kelley, Jr.,

Appellant.

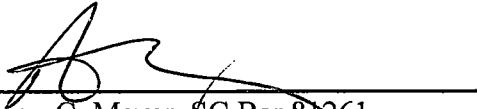
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MAR 12 2018  
SC Court of Appeals

NOTICE TO CURE DEFICIENCIES

Appellant pled guilty, it is true, to Assault and Battery, Second Degree, which did not require placement on the sex offender registry. Appellant asserts that the decision below is based on a flawed evaluation, conducted by a Helen Clark, Ph.D., using the "Abel Assessment," so named for the designer of the psychological evaluation measure. There are multiple problems with the Able Assessment, all of which were raised in the lower court. But the lower court relied on the Able Assessment, it seems from the order, as one of two major factors in making its decision.

The second factor on which the lower court relied was the mere appearance of a complaint against the Appellant by a DSS-style agency in Virginia, which was not sworn to and was not validated as reliable and authentic. The prior complaint of which Appellant was aware was long ago found to be "unfounded" and summarily dismissed as a result. Like the first issue, this one too was raised by Appellant in a written motion timely filed and ruled upon in the court below.

March 8, 2018  
Charleston, SC

  
\_\_\_\_\_  
Aaron C. Mayer, SC Bar 81261  
2000 Sam Rittenberg Blvd., Ste. 2011  
Charleston, South Carolina 29407  
(843) 225-7240  
Attorney for Appellant

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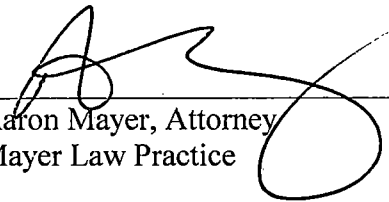
v.

Lawrence Kelley, Jr.,

Appellant.

PROOF OF SERVICE

I, Aaron Mayer, attorney below for the Appellant, certify that served the within Notice to Cure Deficiencies on March 8, 2018, by mailing, postage pre-paid, a copy of the same to Mary P. Brown, Berkeley County Clerk of Court, P.O. Box 6122 Moncks Corner, SC 29461, Anne Williams, Assistant Solicitor for the Ninth Judicial Circuit, P.O. Box 6122 Moncks Corner, SC 29461, South Carolina Attorney General Alan Wilson, Rembert Dennis Building, 1000 Assembly St., Room 519, Columbia South Carolina, 29201, and The Honorable Judge Kristi Lea Harrington, 300B California Ave., Moncks Corner, SC 29461.

  
\_\_\_\_\_  
Aaron Mayer, Attorney  
Mayer Law Practice

This 8<sup>th</sup> day of March 2018.  
Charleston, South Carolina



*Of the People, For the People*

Aaron Mayer, Attorney  
Mayer Law Practice  
2000 Sam Rittenberg Blvd., Ste. 2011  
Charleston, SC 29407  
aaron@mayerlawpractice.com

March 8, 2018

Jenny Abbott Kitchings, Clerk of Court  
The South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: Lawrence Kelley, Jr.  
Case: State v. Lawrence Kelley, Jr.  
Appellate Case No.: 2018-000364

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SC Court of Appeals

Dear Ms. Kitchings:

Enclosed are:

- 1) A corrected Proof of Service of the Notice of Intent in this matter;
- 2) A copy (redaction unnecessary in this instance) of the Order below; and
- 3) An explanation of the issues raised on appeal and the manner in which the same issues were raised and ruled on below.

By copy of this letter, I am also serving the following: Attorney General, Alan M. Wilson; Assistant Solicitor Anne Williams; care of Ninth Circuit Solicitor, Scarlett Wilson; Berkeley County Clerk of Court, Mary P. Brown; The Honorable Judge Kristi Lea Harrington.

Please call me anytime with any questions at all. With kindest regards, I am,

Sincerely,

  
Aaron C. Mayer

Licensed in: South Carolina  
North Carolina  
Florida

Enclosures

cc: Alan M. Wilson, Attorney General  
Assistant Solicitor Anne Williams, care of Ninth Circuit Solicitor Scarlett Wilson  
Mary P. Brown, Berkeley County Clerk of Court  
The Honorable Judge Kristi Lea Harrington  
Robert Dudek, Esq. (by email only)



Mayer Law Practice, LLC  
2000 Sam Rittenberg Blvd., Ste. 2011  
Charleston, SC 29407



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SC Court of Appeals

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