

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Orangeburg County  
Maite Murphy, Circuit Court Judge

JUN 29 2018

SC Court of Appeals

THE STATE,

RESPONDENT,

v.

MICHAEL LORENZO GREEN,

APPELLANT.

APPELLATE CASE NO. 2017-001240

PRO SE RESPONSE TO ANDERS BRIEF

Michael Lorenzo Green  
Appellant, Pro se

#200769

Lieber Corr. Inst. Stono B-23

P.O. Box 205

Ridgeville, SC 29472-0205

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APPELLATE DEFENSE

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## STATEMENT OF ISSUES ON APPEAL

1. Trial court failed to properly give instructions to the jury during the charges at the end of the trial regarding the redacted portions of the video statement given to law enforcement that was improperly shown to the jury.
2. The cumulative error of several instances of prosecutorial misconduct during the closing argument regarding improper vouching, attributing testimony to witnesses who did not testify, attributing words to Appellant that were never said by him, and improper inferences to Appellant's 5th Amendment right to remain silent, resulted in an unfair trial in violation of the 14th Amendment.
3. The trial court erred in denying Appellant's motion to voir dire two additional questions and denied the Appellant a fair trial and an impartial jury, in violation of the Sixth and Fourteenth Amendments.

## STATEMENT OF THE CASE

On June 15, 2016, an Orangeburg County Grand Jury indicted Appellant for murder. The State, represented by Ashley B. Cornwell, called the case for trial before the Honorable Maite Murphy and a jury. On May 22-24, 2017, R. 1. Minh Lee Wyman, Esquire, represented Appellant. R. 1. The jury found Appellant guilty as charged. R. 235, L. 22-25. Judge Murphy sentenced Appellant to life imprisonment without the possibility of parole. R. 242, L. 25-R. 243, L. 2; R. 248

On May 27th, 2017, Appellant timely served his notice of appeal.

On March 27, 2018, Susan B. Hackett, from the Division of Appellate Defense, submitted an Anders<sup>①</sup> Brief on the Appellant's behalf and requested to be relieved as counsel.

Appellant submits his Pro se Response to the Anders Brief

① Anders v. California, 386 U.S. 738 (1967)

## STATEMENT OF FACTS

Franklin Degree [victim] and Darlene Holmes were romantically involved for sixteen years. R. 85, LL. 1-6. Prior to and during that relationship, Ms. Holmes was arrested and convicted for fraudulent checks, a crime of dishonesty. R. 71, LL. 10-15. The two were renting a room from Ms. Salley Rivers. R. 85, L. 18-R. 86, L. 3; R. 96, LL. 12-18. Ms. Rivers had prior convictions for shoplifting and a span of 25 years of cocaine addiction resulting in two convictions for possession of cocaine. R. 70, LL. 23-R. 71, L. 9. At Appellant's trial, the State called both as witnesses, but at no point did the jury learn these facts of dishonesty, and were unable to conclude that their contradictory testimonies were incredible or inaccurate.

Appellant was friendly with Salley and visited often in her home. R. 86, LL. 9-12; R. 97, LL. 12-24. Ms. Rivers knew the Appellant since he was very young. R. 97, L. 16. Appellant was always welcome at her home. R. 98, L. 3. During these visits, Appellant and Darlene developed a friendship. R. 86, LL. 9-12.

One evening, Darlene heard an argument ensuing outside her home. R. 87, LL. 1-9. Darlene asked "Frank what's wrong?" He was so over-angry he couldn't speak at all. R. 88, LL. 3-4. While Darlene was in the bathroom and Salley was in her bedroom with her boyfriend "Priest" both allegedly

heard a gunshot. R. 88, L.L. 12-15; R. 98, L.L. 11-21; R. 104, L.L. 16-21. What is particularly strange and was never addressed at trial is the fact Salley does not know her boyfriend's real name who was alone waiting in her bedroom for her. Furthermore, there were several people in her house and she could not identify any of those visitors in her home by their actual names. R. 105, L.L. 3-5.

In contrast, Assistant Solicitor, Ashley B. Cornwell, stated:

"I could have brought in Fifi and Greek and New York and all of these other people that were allegedly at the house when this incident occurred." "Nobody else saw the shooting as it actually happened."

R. 203, L. 13-R. 204, L. 10.

The Solicitor explained she "could've easily subpoenaed all of them and brought them into Court and put them on the stand, but what good would that have done? Would that have proven anyone what happened to hear them say, yeah, I was at the house, but I didn't see it? There was no need to bring all these people and no need to waste your time with all-those-that testimony and to drag this case out any longer than it has to be." R. 204, L.L. 13-20,

### Arguments

Trial Court failed to properly give instructions to the jury during the charges at the end of the trial regarding the redacted portions of the video statement to law enforcement that was improperly shown to the jury.

### Relevant facts

Prior to trial, defense counsel moved to exclude Appellant's statements to law enforcement. R. 33, ll. 4-22. Judge Murphy took the matter under advisement to permit her to watch the video of the interrogation overnight. R. 35, ll. 16-17. The Court did find the statement is freely and voluntarily given in compliance with Miranda. R. 66, ll. 18-19. However, Judge Murphy ordered portions of the video interrogation to be redacted, finding the portions more prejudicial than probative because there has no evidence presented that it's actually connected to the crime for which he is on trial today. R. 67, ll. 8-12. So the attorneys were instructed to mute that portion of the DVD. R. 67, ll. 13-14.

The solicitor objected to the redaction, but the judge overruled the state's objection. R. 67, ll. 23-25. After argument the Court found it's not relevant to this case and it's more prejudicial than probative. R. 69, ll. 5-7.

When the state sought to introduce Appellant's statement into evidence during the trial, defense counsel renewed her objection. R.156, ll. 11-15. Nevertheless, the judge overruled the objection and permitted the jury to see and hear the interrogation. R.156, ll. 16-17; R.157, ll. 3-6. Despite the judge's earlier ruling to redact a portion of the video, to which the state objected, the jury saw the entirety of the video. R.157, ll. 3-19. The judge explained she would give an instruction to the jury during the charges at the end of the trial regarding the portions of the video improperly shown to the jury. R.157, ll. 12-19. During the charge the judge merely mentions to the jury "The fact that portions of some evidence may have been redacted or omitted should not be considered by you in any way." R.219, ll. 6-8. The judge completely fails to mention what evidence she is referring to specifically and was redacted not "may have been" redacted. Nowhere in the record could the jury infer what the overly broad and general charge was pertaining to leaving the highly prejudicial, irrelevant evidence regarding the threat to shoot a person unrelated to this case. This evidence

did not make the existence of any fact more or less probable than it would be without the evidence, Rule 401, SCRE. To the extent that the State can argue that it was probative in some way, the potential prejudicial effect highly outweighs any possible probative value as it easily creates unfair prejudice, confuses the issues and misleads the jury. Rule 403, SCRE.

#### Argument

The cumulative error of several instances of prosecutorial misconduct during the closing argument regarding improper vouching, attributing testimony to witnesses who did not testify, attributing words to Appellant that were never said by him, and improper inferences to Appellant's 5<sup>th</sup> Amendment right to remain silent, resulted in an unfair trial.

#### Relevant facts

In the states closing argument the solicitor's improper inference toward Appellant's decision to retain his Fifth Amendment right against self incrimination was violated.

Specifically, her sarcastic reference related to Appellant's opening statement, which she emphasized was not proven, was this: "A jealous boyfriend. An aggressive individual. That was the picture the defense painted for you at the beginning of this trial. It was dramatic. It was gripping. I was ready to sit back, grab my popcorn, and watch what was going to happen on the stand. But what the defense told you was going to happen -- that didn't come to fruition. R. 184, ll. 4-10. The solicitor made a conscious effort to encourage the jury to shift the burden of proof to the defense which is completely unreasonable and unfair.

Later in her closing argument she improperly vouched for two of the state's witnesses by stating "And while I don't believe anything that the defendant has said, I do think that what Salley Rivers told you is true and what Darlene Holmes told you is true," R. 199, ll. 7-9. Darlene Holmes told one officer a bunch of people were at the house, then, told another officer, no, there was no one else at home. Also she told officers Appellant had a gun, then, testified "I didn't see a gun." R. 208, ll. 21-25. Salley Rivers did the same thing about people at the house, then, no one was there. But

Salley took it to another level when she claims that the Appellant said "I told you I was going to kill someone." When would he have possibly said that based on the fact she didn't know he was there? R. 209, 7-14. Her vouching for these witnesses is unreasonable and unsupported by the record. The fact the solicitor's comments to the jury are inaccurate and prejudicial prove misconduct.

As detailed above in the statement of facts the solicitor claims she could have brought Fifi, Greek, New York and Priest in to testify that they never witnessed anything. How? Salley did not know her boyfriend's real name nor anyone else's, but, alas, the solicitor has some way to subpoena people by a single nickname. She also has some special powers that reveal what law enforcement would say if they took the stand. R. 203, 11. 13-25 - R. 205, 11. 5-10. When the Appellant declared, "I had to get my head straight" the solicitor began attributing her version to the jury as to what he meant by getting his head right. R. 194, 11. 3-6. It is unfair to allow the state to explain the meaning of a statement to the jury that was never said by the Appellant himself.

The Assistant Solicitor's comment during closing argument was improper and violated Appellant's constitutional right to remain silent. V and XIV amends. U.S. CONST.

It is improper for the State to refer to or comment upon a defendant's exercise of a constitutional right. State v. Johnson, 293 S.C. 321, 360 S.E.2d 317 (1987). Such comments may not be made either directly or indirectly. State v. Goolbsay, 295 S.C. 110, 268 S.E.2d 31 (1980), overruled on other grounds by State v. Torrence, 305 S.C. 45, 406 S.E.2d 315 (1991); State v. Rouse, 262 S.C. 581, 206 S.E.2d 873 (1974).

The Fifth and Fourteenth Amendments to the United States Constitution forbid comment by the prosecution on the accused's silence or failure to testify, as well as instruction by the Court that such silence is evidence of guilt. Griffin v. California, 380 U.S. 609 (1965); State v. Cockerham, 294 S.C. 380, 365 S.E.2d 22 (1988) (holding that prosecutor's indirect reference to defendant's silence and indirect comments on defendant's exercise of his right to counsel and jury trial violated defendant's due process rights and were reversible in murder

kidnapping trial). In State v. Hawkins, 292 S.C. 418, 423, 359 S.E.2d 10, 13 (1987) the South Carolina Supreme Court reversed Hawkins' conviction where prosecutor improperly commented upon Appellant's failure to testify and explaining that such a comment essentially is a comment upon defendant's right to testify, overruled by State v. Torrence, 305 S.C. 45, 406 S.E.2d 315 (1991).

The Assistant Solicitor improperly vouched for and bolstered the testimony of the State's witnesses and argued facts not presented to the jury, conveying the impression that there were evidence known to her but wasn't presented to the jury. Here the Solicitor essentially was telling the jury that the witnesses had testified truthfully and she had other non-testifying witnesses that would corroborate the State's theory and witnesses testimony.

Although a prosecutor may argue the credibility of a witness based on the record and its reasonable inferences, a prosecutor may not vouch for the credibility of a prosecution witness based on personal knowledge or other information outside

the record. Matthews v. State, 350 S.C. 272, 276, 565 S.E.2d 766, 768 (2002) (citations omitted). As explained by the South Carolina Supreme Court, "[v]ouching for a witness based on outside material conveys the impression to the jury that the solicitor has evidence not presented to the jury but known by the prosecution which supports conviction." Id. Generally, "[a] prosecutor improperly vouches for a witness' credibility and places the government's prestige behind a witness' credibility and places the government's prestige behind a witness by making explicit personal assurances, or indicating that information not presented to the jury supports the testimony." Vaughn v. State, 362 S.C. 163, 169, 607 S.E.2d 724, 738 (2004).

Here, the solicitor's argument was based upon her personal knowledge regarding the witnesses. The solicitor's improper vouching denied Appellant's due process right to a fair trial. See Humphries, 351 S.C. 362, 373, 570 S.E.2d 160, 166 (2002) ("The relevant question is whether the solicitor's comments so infected the trial with unfairness as to make the resulting conviction a denial of due

process. Appellant is accordingly entitled to a new trial.

Here, the solicitor's vouching for the witnesses' credibility invaded the jury's province and placed the government's prestige behind the witnesses.

Appellant's conviction and sentence should be vacated or, in the alternative, reversed and remanded for a new trial.

The trial erred in denying Appellant's motion to voir dire two additional questions and deny the Appellant a fair trial and impartial jury, in violation of the Sixth and Fourteenth Amendments.

### Relevant Facts

All criminal defendants have the right to a trial by an impartial. U.S. Const. amends. VI and XIV; S.C. Const. art. I, §14, State v. Woods, 345 S.C. 583, 587, 550 S.E.2d 282, 284 (2001). To protect both parties right to an impartial jury, the trial judge must ask potential jurors whether they are aware of any bias or prejudice against a party. State v. Kelly, 331 S.C. 132, 502 S.E.2d 99 (1998). "Through the judge, parties have a right to question jurors on their voir dire examination not only for the purpose of showing grounds for a challenge for cause, but also, within reasonable limits, to elicit such facts as will enable them intelligently to exercise their right of peremptory challenge. State v. Gullette, 277 S.C. at 370, 287 S.E.2d at 490.

During the jury voir dire, the trial judge asked the following questions:

- 1- Ladies and gentlemen of the jury panel, is anyone related by blood or marriage or has a close

personal or social relationship or has ever been represented in any capacity with anyone from the Solicitor's Office? If so, please stand.

(Several people stood) R. 37, L.L. 20-25.

2- ... Anyone related by blood or marriage or has ever been represented in any capacity by any member of the Public Defender's Office? If so, please stand.

(no one stood) R. 45, L.L. 12-17.

3- Ladies and gentlemen, this is Mr. Michael Green [Appellant] seated here at counsel table in the white shirt and the glasses. Anyone related by blood or marriage or has a close personal or social relationship or any acquaintance with Mr. Green? If so, please stand.

(one person stood) R. 45, L.L. 19-24.

4- Ladies and gentlemen, I'm going to read to you a list of potential witnesses in this case and, after I read this list of potential witnesses, I'll ask you the same question, if you're related by blood or marriage or have a close personal or social relationship with any of these potential witnesses. And if you're in the courtroom, if you would please stand so the jury can see you. And

5- Anyone related by blood or marriage or has a close personal or social relationship with any of potential witnesses that I just listed? If so, please stand.

(no one stood) R. 48, L.L. 6-12; 18-21.

6- Ladies and gentleman of the jury panel, is there any member of the jury panel who is a member or a contributor to any group which has as its primary concern for the promotion of law enforcement or victim's rights? These groups would include but are not limited to MADD, JADD, or Citizens Against Violent Crime. If so, please stand.

(No one stood) R. 48, L. 22-49, L. 3.

7- Ladies and gentleman of the jury panel, I have read to you my allegations in this case. Any member of the jury panel had -- heard anything about this case before today, either through news media or through any conversations or have any information about this case before today, or even in the court house this morning? If so, please stand.

(No one stood) R. 49, L. 4-10.

8- Is there any member of the jury panel who has formed or expressed any opinion about any issue or matter involved in this case? If so, please stand.

(No one stood) R. 49, L. 11-14.

9- Is there any member of the jury panel that was a member of the grand jury which issued the indictment in this case? If so, please stand.

(No one stood) R. 49, L. 15-18.

10- Ladies and gentlemen, I read to you again the indictment, which states the allegations in this case. Is there anything about this type of case, whether it's your previous experience or that of your close personal or family friends, that would cause you in any way to hesitate in your ability to be fair and

impartial to both the State and to the defense?  
If so, please stand.

(One person stood) R. 49, L. 19-50, L. 1.

11- Does any member of the jury panel know of any reason whatsoever why he or she should not serve as a juror in this case, with a particular emphasis on your ability to be fair and impartial to both the State and to the defense? If so, please stand.

(No one stood) R. 51, L. 7-12.

After seating the jury, R. 57-64 and, ruling on previous Jackson v. Denno hearing, R. 65, L. 9-69, L. 7. Trial counsel made a motion about the voir dire. R. 69, L. 9-12. The trial judge allowed defense counsel to put the motion in the record. R. 69, L. 13.

Counsel submitted a copy of additional requests for voir dire of two additional questions. The following questions were not asked during voir dire: (1) "Have you, any member of your family or any close friend ever been the victim of a crime?" and (2) "Does any member of the jury panel have any moral or religious opposition to the use of alcohol and drugs?" R. 69, L. 12-21.

Counsel argued that this process [voir dire] is about uncovering potential biases and that Appellant

believed we need to know if any of the members of the jury panel would have been one of those biased jurors. R. 69, L. 22-25.

The trial judge denied the motion to voir dire on the basis that the "questions that were asked encompassed those concerns of the defense. That it was a very broad question to the jury." And that she read the indictments and allegations and asked the jurors if anything whatsoever would cause them to hesitate based upon their prior experiences or that of their family members or acquaintances to be fair and impartial, and if they had any biases or prejudice towards either the State or any reason whatsoever why they could not sit fairly and impartially; that it was in the Court's discretion and that the Court adequately addressed those concerns as many of the jurors did come up and disclose such information during the voir dire process and denied motion. R. 70, L. 1-15.

The trial judge erred in failing to ask the two requested voir dire questions, denying the Appellant a fair trial and impartial jury.

Here, it was determined if the jurors understood such a broad question concerning their previous experiences or that of close personal or family friends, that would cause them to hesitate in their ability to be fair and impartial to both the State and to defense. The record certainly does not reflect any of the religious or moral beliefs of the jurors concerning the use of alcohol or drugs.

The jurors could not adequately answer the question, it being so broad concerning their experiences with crime and certainly could not answer a question not asked concerning their religious or moral beliefs on the use of alcohol and drugs.

The trial judge and defense counsel could not fulfill their duty to screen out biased jurors without accurate information. Kelly, 331 S.C. at 145, 502 S.E.2d at 106.

The Sixth Amendment guarantees a criminal defendant a verdict by impartial, indifferent jurors. The bias or prejudice of even a single juror would violate Appellant's right to a fair

trial. See, e.g., United States v. Hendrix, 549 F.2d 1225, 1227 (5th Cir. 1977). Voir dire is one important mechanism for assisting parties to probe potential jurors for prejudice. The jurors in this case could have forgotten incidents long buried in their minds, misunderstood a question and certainly could not answer a question never asked.

The Sixth and Fourteenth Amendments to the United States Constitution "guarantee to the criminally accused a fair trial by a panel of impartial and indifferent jurors. The failure to accord an accused a fair hearing violates even the minimal standards of due process." Irvin v. Dowd, 366 U.S. 712, 722 (1961).

Appellant's conviction and sentence should be reversed and remanded for a new trial.

### Conclusion

Prosecutorial misconduct is crystal clear in this case.  
When a solicitor's actions and statements contain the  
elements of deception, intended to undermine the out-  
come of a jury trial, should never be tolerated. To attempt  
to appeal to the juror's minds with speculative insight  
of what missing witnesses would have said had they  
took the stand, attributing words to the Appellant that  
were never said by him, bolstering witnesses credibility  
when their actual testimony is inaccurate or even fabricat-  
ed and finally, shifting the burden of proof to a defendant  
exercising his Fifth Amendment rights is so unfair  
that it is incurable and impossible to turn it into a fair  
trial.

This case is one that should be reversed in the  
interest of justice and remanded to the General Sessions  
Court for a new trial.

STATE OF SOUTH CAROLINA  
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Appeal from Orangeburg County SC Court of Appeals  
Maite Murphy, Circuit Court Judge

THE STATE,

RESPONDENT,

v.

MICHAEL LORENZO GREEN,

APPELLANT,

CERTIFICATE OF SERVICE

I, the undersigned, declare under the penalty of perjury and state that I served the original "Pro se Response To Anders Brief" on the Clerk of the South Carolina Court of Appeals by placing the same in a pre-paid envelope (first-class postage) addressed as follows: Honorable Jenny Abbott Kitchings, Post Office Box 11629, Columbia, S.C. 29211 and placing envelope and contents in the United States Mail at the Lieber Correctional Institution's mailroom on June , 2018.

*Michael L. Green*

Michael L. Green #200769  
Lieber Corr. Inst. Station B-23  
P.O. Box 205  
Ridgeville, SC 29472-0205

Dated this day of June, 2018  
Ridgeville, South Carolina

Michael L. Green # 200769  
Lieber Com. Inst. Stone B-23  
P.O. Box 205  
Ridgerville, SC 29472-0205  
June , 2018

Hon. Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, S.C. 29211

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JUN 29 2018  
SC Court of Appeals

Re: Pro Se Response to Anders Brief  
State v. Green  
Appellate Case No. 2017-001240

Dear Clerk,

Enclosed for filing with your Office, please find my  
pro se Response to Anders Brief.

Thank you for your assistance in this matter. Could not  
get to law library to get copy and we can not get to the  
law library but about an hour or two a week, if we get  
that.

Sincerely,

X  
Michael L. Green



# SCCID

SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

ORIGINAL

Division of Appellate Defense  
1330 Lady Street, Suite 401  
Columbia, South Carolina 29201-3332  
Post Office Box 11589  
Columbia, South Carolina 29211-1589  
Telephone: (803) 734-1330  
Facsimile: (803) 734-1397

Robert M. Dudek, Chief Appellate Defender  
Wanda H. Carter, Deputy Chief Appellate Defender

July 10, 2018

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SC Court of Appeals

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

Re: State v. Michael Lorenzo Green, Appellate Case No. 2017-001240

Dear Ms. Kitchings:

Please accept the pro se brief of appellant filed by the above named individual in response to the Anders brief I recently filed with the Court in the case. Appellant inadvertently mailed this to our office.

If you have further questions, do not hesitate to contact me.

Sincerely,

Susan B. Hackett  
Appellate Defender

SBH/sl

Enclosure

cc: Michael Lorenzo Green, 200769

Mich

#200769

Lieber Corr. Inst. Stano B-23

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