STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of General Sessions
The Honorable Bentley Price, Circuit Court Judge

Appellate Case No. 2019-000825

THE STATE, ...RESPONDENT,

v.

YOLANDA SHATTEN,.....APPELLANT.

INITIAL BRIEF OF RESPONDENT

ALAN WILSON
Attorney General

WILLIAM F. SCHUMACHER, IV
Assistant Attorney General

Post Office Box 11549
Columbia, SC 29211
(803) 734-3713

BYRON E. GIPSON
Solicitor, Fifth Judicial Circuit

Post Office Box 192
Columbia, SC 29202
(803) 576-1800

ATTORNEYS FOR RESPONDENT

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STATEMENT OF ISSUE ON APPEAL

The trial judge properly denied Appellant's motion to reopen the record where Appellant failed to present the requested material during trial and never demonstrated its relevance to her defense. Additionally, even if relevant, the materials are inconsequential to Appellant's conviction because the overwhelming evidence proved her guilt of the charged offenses

STATEMENT OF THE CASE

Appellant was indicted by the Richland County Grand Jury for two counts of forgery, value of less than $10,000 and one count of the unauthorized practice of law. On May 6–7, 2019, Appellant proceeded to a jury trial before the Honorable Bentley Price. Assistant Attorney Generals Joel Kozak, Esquire, and James Haarsgaard, represented the State; Joseph Henry, Esquire, represented Appellant. The jury found Appellant guilty as charged on all counts and the trial judge sentenced her concurrent sentences of five years' incarceration, suspended to five years' probation terminable upon payment after the first year.

Appellant timely filed a notice of appeal and brief. This brief of Respondent now follows.

STATEMENT OF FACTS

Around November/December of 2014, Victim noticed a Zillow listing for the sale of a home located at 608 Wildewood Avenue in Richland County, SC. Interested in home, Victim reached out to Appellant, the listed contact in the listing. Appellant informed Victim she was the real estate agent, and they began corresponding via text messaging and electronic mail. The two began negotiating a sales price for the property, and settled on the asking price, $95,000. In February 2015, Victim met with appellant and provided her with a cashier's check for $5,000 after signing the Intent to Purchase document. Victim signed the document a single time and claimed the initials/additional signature did not belong to her. She never received the Lease with Purchase Option, and accordingly never signed or initialed any page of the document. Further, despite claims that work on the home would be complete shortly after the closing, utilities for the home were never transferred into Victim's name and the home did not have hot water or heating. In April, Appellant gave Victim a copy of the Quit Claim deed, along with the closing statement. On April 30, 2015, a "closing" occurred at the home, with only Appellant and Victim present. Victim's partner paid the costs of the "closing," totaling $3,940. No witnesses were present at the time, and only Victim signed the deed before Appellant departed. After the closing, Victim made two monthly payments to Appellant, both of which were referred to as mortgage payments during their correspondence. (Tr.p.99, line 6–Tr.p.118, line 19; State's Exhibits 1–2, 4, 6–7, 9–11)

Victim stopped making mortgage payments to Appellant when the latter refused to give her receipts or other documentation showing how her payments were being applied to the principle amount of the mortgage. After legal proceedings began, Victim discovered Appellant had removed her possession from the house and sold them without judicial approval and that

Appellant had never attempted to transfer the utilities to Victim. (Tr.p.118, line 20–Tr.p.125, line 18)

During cross-examination, Victim testified that at the time of this property dispute, she worked part-time for Carnival Cruise Lines as a customer service representative, but was also an employee of a tax-preparation service. Although Victim had helped others prepare taxes, she claimed to not have knowledge about real estate deductions; she claimed she was not a CPA and had only helped prepare "basic tax returns." Trial counsel asked Victim whether she ever prepared taxes for a "Tony Baker," or a company he owned, but did not recall ever preparing his taxes. The State objected, explaining the question of preparing taxes was entirely irrelevant to whether Victim had any understanding of how a real estate transaction is performed. The trial judge sustained the objection. (Tr.p.145, line17–Tr.p.152, line 7; Tr.p.169, line 11–Tr.p.170, line 21)

During the time period in which the facts of this case occurred, Investigator Cannon Fulmer handled property and financial crimes for the City of Columbia Police Department. Investigator Fulmer became aware of the situation when the victim, Marilyn Kirkland, contacted her attorney about a real estate transaction she had entered into several months prior. Kirkland had purchased a home and was unaware that it was the subject of a foreclosure action at that time. Kirkland's attorney quickly noticed issues with the paperwork, including the quit claim deed giving her ownership interest in the property. Believing Appellant's actions could potentially involving the crimes of obtaining property under false pretenses and/or forgery, Investigator Fulmer took the case. (Tr.p.22, line 22–Tr.p.25, line 2)

Investigator Fulmer eventually spoke with Appellant in a recorded interview. Appellant claimed she represented and was part owner of a company called Futurism Business Group, a

non-registered corporation.[1] She provided Investigator Fulmer with various documents: the "Quit Claim" deed, a document called "Intent to Purchase," a third item titled "Lease with Purchase Option," a closing statement for the transaction, and a Notice of Cancellation of Mortgage Deed. Prior to his meeting with Appellant, Investigator Fulmer received copies of all the paperwork in Victim's possession. Notably, Investigator Fulmer had not seen the Lease with Purchase Option in Victim's documents. Further, with the exception of the Lease with Purchase Option, all of the documents referred to a transfer of real estate, not a lease of real estate. All of the documents were prepared by Appellant, and she admitted to Investigator Fulmer that she was not a licensed attorney. When Investigator questioned Appellant about the details contained in the documents, she claimed Victim had been in a "rent-to-own situation" with the property, and that an attorney would be the best person to consult about the terminology and legal obligations found within the documents. Both Appellant and Victim also provided Investigator Fulmer with copies of emails and text messages which occurred between them (Tr.p.25, line 3–Tr.p.35, line 24; Tr.p.69, line 18–Tr.p.79, line 25; State's Exhibits 1–4, 7, 9–10, 14)

During cross-examination, further issues with the real estate transaction were pointed out to the jury. William Anthony Baker, not Appellant or Futurism Business Group, was the listed owner of the property. Baker was erroneously referred to as "William Anthony" on the Quit Claim deed, and the deed was never recorded with the Registrar of Deeds office. Additionally,

[1] Although not litigated in this matter, Futurism Business Group is not a registered corporation in South Carolina; the South Carolina Secretary of State's Office does not have any record of its existence. See South Carolina Secretary of State Business Entities Online, https://businessfilings.sc.gov/BusinessFiling/Entity/Search (search "Futurism Business Group"). The State requests this Court take judicial notice of this fact.

Baker was not a party to any of the other documents relating to the real estate transaction. (Tr.p.36, line 4–Tr.p.38, line 17)

During redirect examination, Investigator Fulmer identified the copies of the checks he received from Victim. The proceeds of the checks, which totaled $8,940, were given to Appellant. (Tr.p.80, line 11–Tr.p.82, line 11; State's Exhibits 5–6)

Daniel Shearouse, the Supreme Court of South Carolina's Clerk of Court, testified about Appellant's ability to practice law. After reviewing the Supreme Court's bar admissions records, Shearouse confirmed Appellant has never been a licensed attorney in South Carolina. (Tr.p.91, line 20–Tr.p.97, line 18; State's Exhibit 8)

At trial, Appellant presented a quit claim deed given by Baker to herself giving her his entire interest in the property. Appellant, who was also the notary and a witness to the transaction through the Futurism Business Group, "notarized" the document on August 2, 2014. However, this quit claim deed was not recorded until July 9, 2015, after the instant dispute was underway. (Tr.p.225, line 14–Tr.p.228, line 14)

During her testimony, Appellant admitted to drafting the Quit Claim deed, Lease with Purchase Option, the Intent to Purchase document, the closing statement, and the other document provided to Victim throughout the course of their dealings. She testified that Victim was attempting to purchase the property, but that the transaction never completed. During portions of her testimony, Appellant claimed she, not Baker, owned the property. Further, Appellant did not dispute the authenticity of the emails and text messages sent between her and Victim. (Tr.p.230, line 14–Tr.p.232, line 18; Tr.p.238, lines 1–11)

During cross-examination, Appellant refused to identify copies of the documents she provided to Investigator Fulmer; she admitted such documents existed, but refused to review the

ones presented by the State. When confronted about portions of her written communications with Victim, Appellant conceded she: (1) told Victim she was transferring ownership of the home to her; (2) discussed Victim's real estate "closing"; (3) sent Victim a closing statement; and (4) she received almost $9,000 in "closing costs" from Victim. Appellant claimed the various documents and communications were taken out of context. Further, Appellant admitted she was not an attorney. (Tr.p.247, line 20–Tr.p.273, line 18; State's Exhibits 9–10)

SLED Agent John Jamieson, an expert in document examination, including handwriting analysis, reviewed the documents provided to Investigator Fulmer and testified about his findings at trial. He explained to the jury that handwriting, including a person's signature, is identifiable and unique to an individual, similar to a fingerprint. However, unlike a fingerprint a signature is never exactly the same as any prior or subsequent signatures; because handwriting is a mental and physical process of the human body, signatures cannot be duplicated with the precision of which machines are capable. Using handwriting samples collected by Victim, Jamieson analyzed the writing claimed by Appellant to be Victim's in the Lease with Purchase Option and Intent to Purchase documents. On the Intent to Purchase agreement, Jamieson found Victim likely initialed the first page of the document, but the initials on the subsequent pages were not hers. Jamieson also found it likely that Victim did not initial any of the pages in the Lease with Purchase Option. Moreover, after comparing the initials found in the Intent to Purchase agreement and the Lease with Purchase Option, the pairs of initials between the two documents which were identical, machine copies which were able to be superimposed on top of one another; notably, every set of initials on the Lease to Purchase Option were an exact copy of initials found on the Intent to Purchase document. Jamieson was certain that these signatures were machine copies of each other because people perfectly duplicating their signatures by hand

has "never happened." (Tr.p.185, line 12–Tr.p.195, line 22; Tr.p.203, lines 19–25; State's Exhibits 12–13)

Even more incredible, Jamieson found initials on the sixth and seventh pages of the Lease with Purchase Option were exact copies of the initials found on page 5 of the Intent to Purchase document, with the only difference being they were **upside-down**; a fact which only made duplication of the initials even more suspicious. Ultimately, Jamieson found that, in his professional opinion, Victim's initials were forged on the Intent to Purchase and Lease with Purchase Option documents. (Tr.p.195, line 23–Tr.p.197, line 2)

After the jury was charged and sent to deliberate, trial counsel requested to add into evidence tax returns he claimed to have received from Baker. When asked why he wanted to admit the records, trial counsel claimed they could impact Victim's credibility "which is always a question when you take the witness stand." The trial judge asked trial counsel why he did not have the tax returns available when he was cross-examining Victim, and he said he had no reason to bring them to court because he assumed Victim's testimony would comport with his expected answers. Trial counsel did not explain what was within the returns which would contradict Victim's testimony. Trial counsel requested the trial judge introduce the tax records by "proffer" by amending the records and giving them to the jury. The State disagreed with the admission of the records, noting trial counsel could have brought them to trial with him but elected not to and he was the only one to blame for not having the records available for impeachment. Ultimately, the trial judge did not allow the tax returns into the record, and commended trial counsel on doing a good job of eliciting potential inaccuracies from Victim on cross-examination. (Tr.p.311, line 5–Tr.p.316, line 25)

STANDARD OF REVIEW

In criminal cases, appellate courts sit to review errors of law only. State v. Baccus, 367 S.C. 41, 48, 625 S.E.2d 216, 220 (2006). Decisions to admit or exclude evidence rest in the sound discretion of the trial judge and will only be reversed on appeal for an abuse of discretion. State v. Gaster, 349 S.C. 545, 557, 564 S.E.2d 87, 93 (2002). "An abuse of discretion occurs when the conclusions of the trial court either lack evidentiary support or are controlled by an error of law." State v. McDonald, 343 S.C. 319, 325, 540 S.E.2d 464, 467 (2000). "A trial judge has considerable latitude in ruling on the admissibility of evidence and his rulings will not be disturbed absent a showing of probable prejudice." State v. Kelley, 319 S.C. 173, 176, 460 S.E.2d 368, 370 (1995). "Prejudice occurs when there is reasonable probability the wrongly admitted evidence influenced the jury's verdict." State v. Byers, 392 S.C. 438, 444, 710 S.E.2d 55, 58 (2011). "[T]he appellate court does not re-evaluate the facts based upon its own view of the preponderance of the evidence, but simply determines whether the trial judge's ruling is supported by any evidence." State v. Miller, 375 S.C. 370, 652 S.E.2d 444 (2008).

ARGUMENT

The trial judge properly denied Appellant's motion to reopen the record where Appellant failed to present the requested material during trial and never demonstrated its relevance to her defense. Additionally, even if relevant, the materials are inconsequential to Appellant's conviction because the overwhelming evidence proved her guilt of the charged offenses.

Appellant argues the trial judge erred in failing to reopen the record to allow her to introduce Baker's tax returns. The State disagrees with this allegation of error. Appellant attempted to introduce documents which were in trial counsel's possession during the trial. Further, Appellant failed to demonstrate the tax returns had any relevance to her trial.

Moreover, even if these tax returns were relevant, their introduction would not have impacted the determination of her guilt: all three of her convictions were independently justified by evidence which did not rely on Victim's testimony or credibility: the paperwork she supplied to Investigator Fulmer.

For these reasons, the trial judge did not err and if he had, any alleged error is harmless.

Relevance of the Alleged Tax Statement

"The decision whether to reopen a record for additional evidence is within the trial court's sound discretion and will not be disturbed on appeal absent an abuse of that discretion." Brenco v. S.C. Dep't of Transp., 377 S.C. 124, 127, 659 S.E.2d 167, 169 (2008). "The trial judge is endowed with considerable latitude and discretion in allowing a party to reopen a case." Id. A motion to reopen the record should be denied when the moving party fails to proffer the suggested evidence or show that the evidence could make any difference to the outcome of the case. Wright v. Strickland, 306 S.C. 187, 188, 410 S.E.2d 596, 597 (Ct. App. 1991). Further, there is no abuse of discretion when a trial judge declines to reopen the record

for additional evidence when that same evidence could have been presented by the moving party at trial. See Spinx Oil Co., Inc. v. Fed. Mut. Ins. Co., 310 S.C. 477, 482, 427 S.E.2d 649, 651 (1993), *overruled on other grounds,* Joe Harden Builders, Inc. v. Aetna Cas. and Sur. Co., 326 S.C. 231, 486 S.E.2d 89 (1997).

Initially, the State notes admission of Baker's tax returns have no demonstrable relevance to Appellant's convictions. During trial, when counsel questioned Victim about preparing tax returns, the State properly objected, arguing the preparation of tax returns, even if they involved deductions for real estate, were irrelevant because they did not show Victim had any knowledge about real estate transactions or the closing process. That objection was sustained. Trial counsel sought to submit the tax returns into evidence to support a line of questioning prohibited by the trial judge. Further, the content of the tax returns is entirely unknown to the State, the trial judge, and this Court; Appellant has failed to provide copies of these documents to outside parties and has even failed to describe their contents and how they impeach Victim's credibility. At trial, counsel failed to provide the documents or even describe their contents to the trial judge: trial counsel requested to "proffer" the documents directly into evidence, but following the denial ot his request he failed to request their inclusion in the record for appeal. Similarly, Appellant has failed to provide this information to the State or this Court on appeal. Without any demonstration of the content of this evidence or its value to Appellant's defense, it is only appropriate this Court affirm the trial judge's denial of Appellant's motion to reopen the record. See Wright, 306 S.C. at 188, 410 S.E.2d at 597.

Even if the tax returns had some value to Appellant's defense, the trial judge's refusal to reopen the record was also justified for a second reason: trial counsel made no effort to introduce the documents, which were in his possession, during the trial. When questioned about why he

failed to offer the tax documents while cross-examining Victim, trial counsel admitted he had failed to bring the tax documents with him to trial. Had trial counsel been prepared, he could have offered these documents during Victim's cross-examination, instead of during jury deliberations. Accordingly, trial counsel's lack of preparation also justified the trial judge's denial of the motion to reopen the record. See Spinx Oil, 310 S.C. at 482, 427 S.E.2d at 651.

Unauthorized Practice of Law

S.C. Code Ann. § 40-5-310 provides that "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 pursuant to applicable court rules, or otherwise authorized to perform prescribed legal activities by action of the Supreme Court of South Carolina." "The generally understood definition of the practice of law 'embraces the preparation of pleadings, and other papers incident to actions and special proceedings, and the management of such actions and proceedings on behalf of clients before judges and courts.'" State v. Despain, 319 S.C. 317, 460 S.E.2d 576, 577 (1995). The Supreme Court has defined the practice of law to include the preparation and filing of legal documents involving the giving of advice, consultation, explanation, or recommendations on matters of law. State v. Robinson, 321 S.C. 286, 468 S.E.2d 290 (1996); State v. McLauren, 349 S.C. 488, 563 S.E.2d 346 (Ct. App. 2002).

In State v. Buyers Serv. Co., Inc., 292 S.C. 426, 357 S.E.2d 15 (1987), the Supreme Court of South Carolina explained the preparation of documents for the purpose of real estate transactions constitutes the unauthorized practice of law in South Carolina. The court noted, "The practice of law is not confined to litigation, but extends to activities in other fields which entail specialized legal knowledge and ability," and the justification for such designation was "for the protection of the public from the potentially severe economic and emotional consequences which may flow from erroneous advice given by persons untrained in the law."

Id. at 430–31, 357 S.E.2d at 17–18. The Court applied this same reasoning to other aspects of real estate transactions and found generating title abstracts, performing real estate closings, and recording instruments, were also actions which require supervision by a licensed attorney. Id. at 432–34, 357 S.E.2d at 18–19.

Admission of Baker's tax return was irrelevant to the unauthorized practice of law verdict because Victim's testimony had no bearing on the finding of guilt on that charge. In the instant case, the undisputed evidence at trial demonstrated Appellant was guilty of the unauthorized practice of law. Both Shearouse and Appellant confirmed that she has never been admitted to the South Carolina Bar. The Intent to Purchase, Lease with Purchase Option, Quit Claim Deed, and the closing statement were all prepared by Appellant and signed by her. Appellant performed her "version" of a closing with Victim at the property. Pursuant to Buyers Serv., Appellant's preparation of these documents were, without question, the unauthorized practice of law.

Further, Appellant's actions only confirm the Supreme Court's justification for explicitly defining actions surrounding real estate transactions as the practice of law. First, the legitimacy of the documents presented at trial are in serious question. Appellant, while participating in the transactions, she acted as notary (without use of a notary seal) and as multiple witnesses (she would sign as herself and initial for Futurism Business Group, a non-registered corporation). Further, Appellant claimed she possessed an interest in the property; however, no interest in this property was recorded when Victim entered into the transaction. At that time, Baker was the recorded owner of the property. However, assuming the quit claim deed to her from Baker was a legitimate legal instrument, then Appellant, not Baker or Futurism Business Group, had ownership of the property. Therefore, all of the instruments created contractual relationships

between Victim and parties who did not have ownership interest in the property. It is unclear, without further analysis and litigation of these documents, if Victim could have obtained legal title to the parcel at any point in the future.

Accordingly, the verdict pertaining to Appellant's unauthorized practice of law is entirely unaffected by Appellant's alleged error.

Forgery

Section 16-13-10(A)(2) of the South Carolina code makes it unlawful for a person to "utter or publish as true any false, forged, or counterfeited writing or instrument of writing." In order to constitute forgery by uttering or publishing a forged instrument of writing, three important factors are requisite: (1) It must be uttered or published as true and genuine; (2) It must be known by the party uttering or publishing it as false, forged, or counterfeited; (3) It must be with intent to prejudice, damage, or defraud another person. State v. Wescott, 316 S.C. 473, 477, 450 S.E.2d 598, 601 (Ct. App. 1994). It is not necessary that the person uttering the document be the same person who altered it; knowingly passing the forged document is sufficient. State v. Berry, 76 S.C. 86, 56 S.E. 662, 664 (1907).

"Intent to defraud means an intention to deceive another person, and to induce such other person, in reliance upon such deception, to assume, create, transfer, alter or terminate a right, obligation or power with reference to property." State v. Lee-Grigg, 374 S.C. 388, 402, 649 S.E.2d 41, 48 (Ct. App. 2007) (citing Black's Law Dictionary, 423 (6th ed.1990)). Intent is a question of fact and is ordinarily for jury determination. State v. Tuckness, 257 S.C. 295, 299, 185 S.E.2d 607, 608 (1971). "Intent is seldom susceptible to proof by direct evidence and must ordinarily be proven by circumstantial evidence, that is, by facts and circumstances from which intent may be inferred." Id.

While Victim's testimony, and by extension her credibility, were relevant to the determination of her guilt for the forgery charges, it was unnecessary for finding her guilty of those offenses. It was undisputed by the parties that Appellant received nearly $9,000 in payments from Victim and her spouse. SLED Agent Jamieson analyzed the Intent to Purchase and Lease with Purchase Option documents submitted by Appellant to Investigator Fulmer. Appellant claimed these were the binding, legal documents signed by Victim. After collecting handwriting samples from Victim, he analyzed both documents and found clear evidence of forgery on both documents: both documents contained writing which did not match the samples provided by Victim, and exact duplicates of initialing were found between the documents which, as explained by Jamieson, is impossible to do by hand and requires the use of a machine. Accordingly, Appellant's guilt of the forgery charges was proved by undisputed evidence.

Moreover, although not addressed at trial, Appellant was guilty pursuant to Section 16-13-10(A)(2) for another reason: even if Victim actually signed both documents, they are fatally flawed because they create contractual relationships between Futurism Business Group and Victim, but Futurism Business Group is not a registered corporation nor did it have legal title to the property. Pursuant to the documents recorded at the time Victim purchases the property, Baker was the recorded owner of the property. However, if the quit claim deed between Baker and Appellant is valid, then Appellant herself was the legal owner. In either situation, Appellant bound Victim to a contractual relationship with Futurism Business Group for a parcel it did not own.

For both these reasons, and independent of Victim's testimony, Appellant's actions constituted the crime of "forgery" under South Carolina law.

CONCLUSION

For all the foregoing reasons, it is respectfully submitted that the judgments and convictions of the lower court be affirmed.

Respectfully submitted,

ALAN WILSON
Attorney General

WILLIAM F. SCHUMACHER, IV
Assistant Attorney General

BYRON E. GIPSON
Solicitor, Fifth Judicial Circuit

BY: _____
William F. Schumacher, IV
Bar # 100231
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-0368

ATTORNEYS FOR RESPONDENT

September 9, 2020

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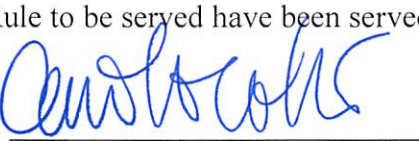
PROOF OF SERVICE

I, Caroline Collins, certify that I have served the within Initial Brief of Respondent and Designation of Matter on Appellant by email to the address listed in AIS for:

Taylor D. Gilliam, Esquire
S.C. Commission on Indigent Defense
Division of Appellate Defense
Post Office Box 11589
Columbia, South Carolina 29211-1589

I further certify that all parties required by Rule to be served have been served this 9th day of September, 2020.



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

Caroline Collins

From: Caroline Collins
Sent: Wednesday, September 9, 2020 2:19 PM
To: 'tgilliam@sccid.sc.gov'
Cc: William Blitch; Bill Schumacher; 'Allgire, Mary'
Subject: The State v. Yolanda Shatten (2019-000825)
Attachments: Shatten, Yolanda - Initial Brief of Respondent and Designation of Matter - 2019-000825 (02374552xD2C78).PDF

Follow Up Flag: Worldox

Good Afternoon Mr. Gilliam,

Attached please find a copy of the Initial Brief of Respondent and Designation of Matter in The State v. Yolanda Shatten (2019-000825). These documents will be submitted to the Court of Appeals today via the AIS One Drive System.

If you will, please reply to this email to confirm receipt.

Thank you!

Caroline Collins
Administrative Coordinator
South Carolina Attorney General's Office
P: (803) 734-3723