

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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S.C. SUPREME COURT

On Petition for Writ of Certiorari to Court of Common Pleas

CAPITAL PCR ACTION

APPEAL FROM PICKENS COUNTY
Honorable Alexander S. Macaulay, Circuit Court Judge

Jerry Buck Inman, #5256
a/k/a Jerry Buck Inmon.....Respondent-Petitioner

v.

State of South Carolina.....Petitioner-Respondent.

Appellate Case No. 2020-000881

**APPENDIX
VOLUME 10 OF 10**

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**ATTORNEYS FOR
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INDEX

PCR ORDERS GRANTING RELIEF AND DENYING RECONSIDERATION

Order Granting Post-Conviction Relief Filed April 21, 2020..... 1

Order Denying Rule 59 (E) Motions Filed May 20, 2020 69

Form 4 Order Filed May 20, 2020..... 84

Amendment to Order Denying Rule 59(E) Motions
Filed May 22, 2020 89

Rule 59(e) Motion and Proffer of Mr. Inman’s Proposed
Order Filed May 1, 2020..... 92

Respondent’s Rule 59(E) Motion Filed May 8, 2020 226

Response in Opposition to the State’s Rule 59(E) Motion
Filed May 12, 2020 399

Response to Applicant’s Rule 59(E) Motion Filed May 20, 2020 403

Reply to State’s Response to Mr. Inman’s Rule 59(E)
Filed May 20, 2020 416

PCR STAY DOCUMENTS AND ORDERS OF APPOINTMENT

Motion for a Stay of Execution and for the Appointment of a
Post-Conviction Relief Judge Dated October 10, 2012..... 425

Return to Petition for Stay of Execution Pending Post-Conviction
Relief Dated October 16, 2012..... 430

SC Supreme Court Order Granting the Motion for a Stay of
Execution Dated October 31, 2012, and appointment of Judge
Macaulay for PCR proceeding 482

Order Appointing Counsel-Filed November 29, 2012 484

PCR ACTION FILINGS, NON-DISPOSITIVE ORDERS AND OTHER DOCUMENTS

Application for Post-Conviction Relief-Filed June 21, 2012 488

Return of Respondents to Application for Post-Conviction Relief and Request for Status Conference and Appointment of Counsel-Filed October 18, 2012 496

First Amended Application for Post-Conviction Relief Filed April 13, 2016 542

Motion for In Camera Inspection of Discovery Materials Asserted to be Privileged or Redacted in Discovery Production (Rule 26, SCRCP) Filed May 12, 2016 551

Return to Amended Application for Post-Conviction Relief and Motion to Dismiss Filed May 16, 2016..... 579

Motion for Summary Judgment Filed July 7, 2016.....623

Cross-Motion for Summary Disposition Filed August 10, 2016 659

Motion for Protective Order and for Postponement of Disposition Filed August 17, 2016..... 674

Order Denying and Dismissing (Respondent’s Motion for Summary Judgment or in the Alternative Motion to Dismiss and Applicant’s Cross-Motion for Summary Disposition, Granting PCR and Remanding for Jury Sentencing), Filed August 26, 2016 678

Second Amended Application for Post-Conviction Relief Filed October 20, 2016..... 683

Return to Second Amended Application for Post-Conviction Relief and Motion to Dismiss Filed November 7, 2016 695

Motion to Quash AGO Request SCDC Transport Mr. Inman to Court on August 20, 2018 and Prohibiting the AGO from Directly Requesting SCDC to Transport Mr. Inman in the Absence of an Order by this Court Filed August 10, 2018 761

Response in Opposition to Motion to Quash Transportation Request Filed August 15, 2018 771

Respondent’s Request for Specific Questioning to Establish Knowing
and Voluntary Waiver Filed August 20, 2018 785

Second [sic] Amended Application for Post-Conviction Relief Filed
August 20, 2018 789

Other Motions and Orders Regarding Discovery Matters

Third Party Motion to Compel Filed February 14, 2014 799

Response to Third Party Motion to Compel Filed February 20, 2014..... 813

Ex Parte Order (filed on public index), resolving motions involving
Third Party, Filed April 10, 2014..... 819

Motion to Compel Discovery Filed January 11, 2016..... 821

Motion to Compel Filed February 3, 2016 825

Form 4 Order Filed March 7, 2016 (finding circuit court does not have
jurisdiction) 829

Order Filed March 8, 2016 (finding that State’s filing in the original
jurisdiction must be resolved before circuit court proceeded on
pending matters)..... 833

PCR HEARING TRANSCRIPT

PCR Merits Hearing, August 20-23, 2018 837

Court Reporter’s Index 838

Pre-trial matters 844

Testimony

James Bannister 950

Direct (Grose) 951

Matters of Law 996

Questioning of Applicant Inman by Court..... 1025

Testimony

James Bannister	1033
Direct (Grose)(cont.).....	1033
Cross (Butterbaugh)	1084
Redirect (Grose).....	1148
Recross (Butterbaugh).....	1164
Dr. Marti Loring	
Direct (Grose).....	1176
Cross (Brown).....	1190
Dr. Louis Viamonte	
Voir Dire (Butterbaugh).....	1240
Direct (Grose).....	1244
Cross (Butterbaugh).....	1264
Dr. Donna Maddox	
Direct (Grose).....	1277
Joseph Savitz	
Direct (Grose).....	1347
Cross (Mitchell).....	1356
Redirect (Grose).....	1363
Dr. Donna Maddox	
Direct (Grose) (cont.).....	1366
Cross (Brown).....	1407

Redirect (Grose).....	1444
Applicant Rests.....	1457
Symmes Culbertson	
Direct (Butterbaugh).....	1458
John DeJong	
Direct (Mitchell).....	1481
Cross (Grose).....	1494
Redirect (Mitchell).....	1496
Recross (Grose).....	1497
Respondent Rests.....	1502
Exhibits from PCR Merits Hearing, August 20-23, 2018	
Applicant’s Exhibit #1, Letter from Mr. Inman.....	1503
Applicant’s Exhibit # 2, E-mail correspondence.....	1504
Applicant’s Exhibit # 3, E-mail correspondence.....	1507
Applicant’s Exhibit # 4, Motion to Reconsider Order dated 11/15/07, RE Jury Trial Sentencing.....	1512
Applicant’s Exhibit # 5, Motion to Reconsider and for New Trial.....	1514
Applicant’s Exhibit # 6, Order Regarding Motion to Reconsider and for New Trial.....	1519
Applicant’s Exhibit #7, Motion and Memorandum to Determine Mode of Trial.....	1520
Applicant’s Exhibit # 8, Supreme Court Order.....	1545
Applicant’s Exhibit # 9, Appeal from Pickens County, 11/21/07.....	1547

Applicant’s Exhibit # 10, Appeal from Pickens County, 1/2/08.....	1555
Applicant’s Exhibit #11, Appeal, 1/9/08.....	1600
Applicant’s Exhibit # 12, Affidavit of Jerry Inman 6/8/07.....	1632
Applicant’s Exhibit # 13, Agreement Confirming Terms of Sentencing.....	1633
Applicant’s Exhibit # 14, Ex Parte Funding Order Number 11, 28, 32, 34.....	1637
Applicant’s Exhibit # 14(a), Order Assigning Case to Judge Few.....	1643
Applicant’s Exhibit # 15, E-mails from 10/08.....	1644
Applicant’s Exhibit # 15(a), Order Appointing Counsel Jim Bannister.....	1650
Applicant’s Exhibit # 16, 10/24/08 Letter from Robert Ariail to Judge Miller.....	1652
Applicant’s Exhibit # 16(a), Order Denying Writ of Prohibition, Assigning Judge Miller.....	1653
Applicant’s Exhibit # 17, 2/6/09 Letter from Robert Ariail to Judge Miller.....	1655
Applicant’s Exhibit # 17(a), Order Clarifying Appointment of Counsel.....	1656
Applicant’s Exhibit # 18, 2/13/09 Letter from Robert Ariail to Jim Bannister.....	1658
Applicant’s Exhibit # 18(a), Jim Bannister Detailed Time Sheet.....	1659
Applicant’s Exhibit # 19, 2/13/09 Letter from Robert Ariail to Judge Miller.....	1679
Applicant’s Exhibit # 20, 3/9/09 Letter from Betty Strom to Judge Miller.....	1680
Applicant’s Exhibit # 21, 3/16/09 Letter from Jim Bannister to Judge Miller.....	1681

Applicant’s Exhibit # 22, 3/25/09 Letter from Betty Storm to Judge Miller.....	1682
Applicant’s Exhibit # 23,4/1/09 Letter from Robert Ariail to Judge Miller.....	1683
Applicant’s Exhibit # 24, 4/6/09 Letter from Bill Godfrey to Judge Miller.....	1684
Applicant’s Exhibit # 25, Notice of Limited Appearance for Dr. Marti Loring.....	1685
Applicant’s Exhibit # 26,4/16/09 E-mail from Bill Godfrey to Jim Bannister.....	1686
Applicant’s Exhibit # 27, Motion for Release of Witness and Related Relief dated 4/2/09.....	1687
Applicant’s Exhibit # 28, 4/17/09 E-mail from Bill Godfrey to Bob Ariail.....	1707
Applicant’s Exhibit # 29, Ex Parte Funding Order #48.....	1708
Applicant’s Exhibit # 30, 2/16/09 Billing from Janet Vogelsang.....	1710
Applicant’s Exhibit # 31, Ex Parte Order #41.....	1711
Applicant’s Exhibit # 32, Psychiatric Evaluation of Jerry Buck Inman by Dr. Schwartz-Watts.....	1713
Applicant’s Exhibit # 33, Ex Parte Order, Symmes Culbertson, 8/25/08.....	1716
Applicant’s Exhibit # 34, Donna Schwartz-Watts Statement of Charges, 9/12/08.....	1718
Applicant’s Exhibit # 35, Gregg Dwyer, MD Statement of Charges 12/5/08.....	1719
Applicant’s Exhibit # 36, Document by Marti Loring, 3/7/14.....	1720
Applicant’s Exhibit # 37, Dr. Louis Viamonte, MD Curriculum Vitae.....	1722

Applicant’s Exhibit # 38, Dr. Louis Viamonte Synopsis of Psychiatric Evaluation.....	1725
Applicant’s Exhibit # 39, Dr. Donna Schwartz-Maddox Report.....	1726
Applicant’s Exhibit # 40, Dr. Tora L. Brawley Neuropsychological Evaluation.....	1737
Applicant’s Exhibit # 41, Dr. Donna Schwartz-Maddox Curriculum Vitae.....	1740
Applicant’s Exhibit # 42, Complaint and Demand for Jury Trial.....	1750
Applicant’s Exhibit # 43, Psychiatric Evaluation of Jerry Inman.....	1871
Applicant’s Exhibit # 44, Ex Parte Funding Order #17.....	1877
Applicant’s Exhibit # 45, Ex Parte Funding Order #21.....	1894
Applicant’s Exhibit # 46, Initial Brief of Appellant.....	1899
*Applicant’s Exhibit # 47, Donald P. Geary Deposition Transcript (sealed in Pickens County Clerk of Court Office – not included)	
*Applicant’s Exhibit # 48, Trina Lucas Deposition Transcript (sealed in Pickens County Clerk of Court Office – not included)	
*Applicant’s Exhibit # 49, Michael Baker Deposition Transcript (sealed in Pickens County Clerk of Court Office – not included)	
*Applicant’s Exhibit # 50, Michael Bednarz Deposition Transcript (sealed in Pickens County Clerk of Court Office – not included)	
*Applicant’s Exhibit #51, Tracey Meyers-Enderson Deposition Transcript (sealed in Pickens County Clerk of Court Office– not included)	
*Applicant’s Exhibit # 52, Alan Taylor Deposition Transcript (sealed in Pickens County Clerk of Court Office – not included)	
*Applicant’s Exhibit # 53, Roger Lindsay Deposition Transcript (sealed in Pickens County Clerk of Court Office – not included)	
*Applicant’s Exhibit # 54, David Blake Deposition Transcript (sealed in Pickens County Clerk of Court Office – not included)	

Applicant’s Exhibit # 55, Robert Ariail Excerpted Deposition Transcript	1927
Respondent’s Exhibits # 1, Letter to Mr. Bannister from Mr. Inman, 1/21/08.....	1933
Respondent’s Exhibits # 2, E-mail Chain	1937
Respondent’s Exhibits # 3, E-mail Chain	1944
Respondent’s Exhibits # 4, Letters from Jerry Inman	1946
Respondent’s Exhibits # 5, Sentencing Order, 4/22/09.....	1955
Respondent’s Exhibits # 6, Brower v. State of Georgia Cite	1966
Respondent’s Exhibits # 7, Excerpted Transcript Hearing Held 11/16/10, State v. Steven Louis Barnes.....	1968
Respondent’s Exhibits # 8, Proffered Questions for Jerry Inman	1974
Court’s Exhibit #1, E-mail Chain Between Judge Macaulay and Counsel	1977
Certificate of Reporter	1981

PCR ADDITIONAL LITIGATION (ORIGINAL WRIT)

Motion to Unseal and Disclose Filed September 17, 2015.....	1982
Memorandum in Response to State’s Motion to Unseal and Disclose Filed September 30, 2015	1994
Reply to Memorandum in Response to Motion to Unseal Ex Parte Funding Requests and Orders filed October 7, 2015	2060
Order Denying Motion to Unseal and Disclose filed November 24, 2015	2063
Respondent’s Rule 59, SCRCF, Motion to Alter or Amend or to Reconsider Filed December 14, 2015	2073
Response to the Rule 59, SCRCF Motion to Alter or Amend or to Reconsider filed December 29, 2015	2193

Order Denying and Dismissing Respondent’s Motion to Alter or Amend or to Reconsider Filed January 4, 2016	2197
Petition for Extraordinary Writ of Certiorari (re: unsealing of <i>ex parte</i> funding requests)	2201
Response to State’s Petition for this Court to Invoke its Original Jurisdiction and Issue and Extraordinary Writ of <i>Certiorari</i>	2443
Reply to Return to Petition for Extraordinary Writ of Certiorari	2460
Motion to Expedite Petition for Extraordinary Writ.....	2477
Response to State’s Motion to Expedite Petition for Extraordinary Writ.....	2511
Order (denying writ of certiorari)	2517
October 23, 2015 PCR motion hearing transcript	2518
Exhibits from October 23, 2015 PCR motions hearing: Respondent Exhibit #1-Thames Decision (ID only)	

SENTENCING AND CHARGING DOCUMENTS

Sentencing Order-Filed April 22, 2009	2577
Order Denying Motion for New Trial-filed July 28, 2009	2586
Death Penalty Sentencing Report-Dated August 24, 2009.....	2587
Indictments	2588
Notice of Intent to Seek the Death Penalty	2596

PRE-SENTENCING APPEAL

Notice of Appeal, November 21, 2007	2597
Initial Brief of Appellant-filed January 7, 2008	2609

Order, Supreme Court of South Carolina (dismissing notice without prejudice) Filed January 9, 2008.....	2655
Petition for Writ of Certiorari, Supreme Court of the United States, Filed April 4, 2008 (per US Supreme Court’s website).....	2658
Brief in Opposition to the Petition for Writ of Certiorari, Filed May 8, 2008.....	2688
June 8, 2008 Opinion, denying petition, issued June 9, 2008	2723
DIRECT APPEAL DOCUMENTS	
Notice of Appeal date August 4, 2009-filed August 6, 2009.....	2724
Final Brief of Appellant.....	2727
Final Brief of Respondent.....	2755
Final Reply Brief of Appellant	2864
Supreme Court of South Carolina Opinion No. 27081 Filed December 28, 2011	2874
Petition for Rehearing Dated January 12, 2012.....	2904
Order Denying Petition for Rehearing Dated January 25, 2012.....	2910
Remittitur Dated January 25, 2012.....	2912
Petition for Stay of Execution Dated January 26, 2012.....	2913
Return to Petition for Stay of Execution to Allow Seeking Certiorari in the Supreme Court of the United States Dated February 3, 2012	2917
Supreme Court of South Carolina Order Granting Petition for Stay of Execution Dated February 23, 2012	2926
Petition for Writ of Certiorari filed in the Supreme Court of the United States Dated June 11, 2012	2929
Appendix	2965
Opinion of South Carolina Supreme Court.....	2966
Order Denying Rehearing	2984

United States Supreme Court Order Granting an Extension of Time	2986
S.C. Code § 16-3-20 (1976).....	2987
Supreme Court of the United States Order Denying Petition for Writ of Certiorari Dated October 1, 2012	2992
Record on Appeal	
Transcript Dated September 8-11, 2008	
Court Reporters Index	2994
Opening Statements by Ms. Strom	3022
Opening Statements by Mr. Bannister	3028
Testimony	
Holly Elaine Bergman	
Direct Examination by Ms. Strom.....	3037
Cross Examination by Mr. Culbertson.....	3045
Christina Ann Morello	
Direct Examination by Ms. Strom.....	3050
Cross Examination by Mr. Culbertson.....	3056
G.W. McCoig	
Direct Examination by Mr. Ariail	3060
Cross Examination by Mr. Bannister	3070
Jeffrey Kindley	
Direct Examination by Mr. Ariail	3076
Cross Examination by M. Bannister	3095
Suzanne Clavel	
Direct Examination by Mr. Ariail	3101
Cross Examination by Mr. Culbertson.....	3109
Matters of Law	3115

Motions.....	3116
Testimony	
Vera Elizabeth Patterson	
Direct Examination by Ms. Strom.....	3121
Cross Examination by Mr. Culbertson.....	3131
Michael Hannon	
Direct Examination by Mr. Ariail	3139
Cross Examination by Mr. Bannister	3165
Rhonda Jackson	
Direct Examination by Mr. Ariail	3168
Cross Examination by Mr. Bannister	3186
Matters of Law	3191
Testimony	
Jessica Gann	
Direct Examination by Ms. Strom.....	3194
Cross Examination by Mr. Bannister	3203
Redirect Examination by Ms. Strom	3204
Michael Hannon	
Direct Examination by Mr. Ariail	3205
Cross Examination by Mr. Bannister	3216
Eric Dean Christensen, M.D.	
Direct Examination by Mr. Ariail	3220
Cross Examination by Mr. Bannister	3238
State Rests.....	3244
Motions	3245
Matters of Law	3248
Testimony	
David Richard Price, PhD	
Direct Examination by Mr. Bannister	3256

Cross Examination by Mr. Ariail	3305
Redirect Examination by Mr. Bannister.....	3313
Recross Examination by Mr. Ariail.....	3314
Motions	3316
Testimony	
Marti Loring, PhD	
Direct Examination by Mr. Bannister	3325
<i>VOIR DIRE</i> Examination by Mr. Ariail.....	3328
Matters of Law	3329
Testimony	
Claude Tournay	
Direct Examination by Mr. Bannister	3353
James Evans Aiken	
Direct Examination by Mr. Culbertson.....	3365
Cross Examination by Mr. Ariail	3381
Denise Baker	
Direct Examination by Mr. Bannister	3386
Questioning of the Defendant.....	3404
Testimony	
David Michael Hensley	
Direct Examination by Mr. Bannister	3406
Motion for Mistrial and Matters of Law	3412
Transcript Dated April 20, 21 and 22, 2009	
Court Reporters Index	3441
Motions	3445
Testimony	
Marti Loring, PhD	
Direct Examination by Mr. Bannister	3473
Cross Examination by Ms. Strom.....	3487

Redirect Examination by Mr. Bannister.....	3494
Motions	3499
Testimony	
John Mauldin	
Direct Examination by Mr. Bannister	3520
Cross Examination by Mr. Ariail.....	3559
Redirect Examination by Mr. Bannister	3589
Troy Tessier	
Direct Examination by Mr. Bannister	3590
Cross Examination by Mr. Ariail.....	3594
Susan Allen	
Direct Examination by Mr. Bannister	3597
Cross Examination by Mr. Ariail.....	3604
Matters of Law	3606
Desa Ballard	
Direct Examination by Mr. Bannister	3617
Cross Examination by Mr. Ariail.....	3632
Matters of Law	3642
Motions	3649
Testimony	
Kenneth McArthur	
Direct Examination by Mr. Bannister	3666
Matters of Law	3668
Testimony	
Marti Loring, PhD	
Examination by the Court.....	3673
Cross Examination by Mr. Bannister	3707
Cross Examination by Ms. Strom	3711
Matters of Law	3719

Closing Argument by Mr. Ariail.....	3730
Defendant Inman’s Comments to the Court.....	3741
Closing Argument by Mr. Bannister.....	3742
Questioning of the Defendant.....	3750
Decision of the Court.....	3752
Transcript dated January 8, 2007.....	3767
Motions	3770
Transcript dated April 16, 2007	3777
Transcript dated September 14, 2007.....	3787
Motions	3799
Transcript dated May 8, 2008	3845
Motions	3847
Transcript dated July 18, 2008	3863
Motions	3865
Transcript dated July 30, 2008	3877
Motions	3880
Guilty Plea Transcript dated August 19, 2008.....	3921
Testimony	
Donna Marie Schwartz-Watts, M.D.	
Direct Examination by Mr. Culbertson	3933
Jerry Buck Inman	
Examination by the Court.....	3935
Transcript dated August 27, 2008.....	3987
Motions	3990
Testimony	
Carla Field	
Direct Examination by Mr. Bannister	4006
Examination by the Court.....	4020
Redirect Examination by Mr. Bannister.....	4021

State’s Exhibit #28-Note from Laney Jury	4217
State’s Exhibit #29-Letter dated July 16, 2006	4219
Court’s Exhibit #3-Letter dated April 16, 2009	4220
Motion to Determine Mode of Trial	4221
State’s Response to Defendant’s Motion to Determine Mode of Trial	4223
Renewed Motion for Recusal of Thirteenth Circuit Solicitor’s Office	4224
Response to Renewed Motion for Recusal of Thirteenth Circuit Solicitor’s Office.....	4226
State’s Response to Defendant’s Motion to Reconsider Order Dated November 15, 2007 re: Jury Trial Sentencing After Entry of Guilty Plea	4227
Motion to Suspend Proceedings.....	4228
Motion to Determine Role of Solicitor Ariail and Prosecution Team	4230
Renewed Motion for Mistrial, Motion to Impose Life Without Parole and Memorandum in Support thereof	4233
State’s Response to Motion to Reconsider and for New Trial	4261
Response to Motion to Suspend Proceedings	4262
Motion to Reconsider and for A New Trial	4263
Order.....	4267
Petition for Attendance for An Out-Of-State Witness.....	4268
Return to Petition for Attendance for an Out-Of-State Witness	4271
Motion to Seek Assurance of Out-Of-State Witnesses Appearance in South Carolina.....	4279

Motion for Continuance Based Upon Duty to Present Mitigation Evidence	4282
Certificate of Counsel.....	4285

HEARING EXHIBITS (not included in Record on Appeal)

January 8, 2007 Motion for DNA Hearing

- *State’s Exhibit #1-DNA Analysis
(Sealed by The Honorable John Few – not included)
- *State’s Exhibit #2-Property Release Form
(Sealed by The Honorable John Few – not included)

May 8, 2008 Motion for Change of Venue

Defendant’s Exhibit #1-Survey.....	4287
------------------------------------	------

August 19, 2008 Guilty Plea Hearing

State’s Exhibit #1 and 2-Photos	(will transport)
State’s Exhibit #3-Diagram	4308
State’s Exhibit #4-7-Photos	(will transport)
State’s Exhibit #8-Admonition and Waiver-Jefferson County Sheriff’s Department.....	4313
State’s Exhibit #9-Statement of Jerry Inman.....	4312
State’s Exhibit #10-SLED Miranda Rights.....	4315
State’s Exhibit #11-Voluntary Statement of Jerry Inman.....	4317
Defendant’s Exhibit# 1-Psychiatric Evaluation of Jerry Buck Inman	4321
Court’s Exhibit #1-Summary of Facts supporting Charges Against Jerry Inman.....	4324

September 8-11, 2008 Sentencing Hearing

State’s exhibit #12-15-Photos(will transport)¹
State’s Exhibit #16-CD (will transport)
State’s Exhibit #16 A,B and C-Photos..... (will transport)
State’s Exhibit #17-Summary of Criminal History 4336
State’s Exhibit #17 A-Certified conviction 4337
State’s Exhibit #17 B and C-Certified Copy of Conviction..... 4347
State’s Exhibit #17D-Certified Copy of Release 4356
State’s Exhibit #18-Advice of Rights and Waiver..... 4357
State’s Exhibit #19-Statement of Jerry Inman in Alabama Case..... 4358
State’s Exhibit #20-Advice of Rights and Waiver..... 4360
State’s Exhibit #21-Signed Statement of Jerry Inman in Alabama Case .. 4361
State’s Exhibit #22-Admonition and Waiver-Jefferson County 4367
State’s Exhibit #23-Statement of Jerry Inman in Tennessee Case 4367
State’s Exhibit #24-Bikini top [will not transport – at Clerk’s Office]
Defendant’s Exhibit #1-Psychiatric Evaluation of Jerry Buck Inman 4370
Defendant’s Exhibit #2-Curriculum Vitas-David Richard Price, PhD 4373
Defendant’s Exhibit #3-North Carolina Department of Corrections Mental
Health Record..... 4402
Defendant’s Exhibit #4-18-Florida Department of Corrections Mental Health
Record 4403
Defendant’s Exhibit #19-Pickens County Medical Information Report 4423
Defendant’s Exhibit #20-Drawing..... (will transport)
Defendant’s Exhibit #21-Authenticity of Documents..... 4425
Defendant’s Exhibit #22-27-Photos..... (will transport)
Defendant’s Exhibit #28-Timeline..... 4427
Defendant’s Exhibit #29-Diagram (will transport)

¹ State’s Exhibits 1-11 were previously marked and entered into evidence on August 19, 2008. They are included under the exhibits listed for that date.

Defendant’s Exhibit #30-Letter dated April 28, 2004	4428
Defendant’s Exhibit #31-Florida Department of Corrections Mental Health Record	4429
Court’s Exhibit #2-SLED Live Feed Investigation ²	4431

April 20-22, 2009 Sentencing Hearing

State’s Exhibit #25-Proposal	4544
State’s Exhibit #26-Order	4545
State’s Exhibit #27-Note from Laney Jury	4547
State’s Exhibit #28-Note from Laney Jury	4548
State’s Exhibit #30-Marti Loring’s Testimony from <u>State v. Andres Torres</u>	4550
Defense Exhibit #44-Partial Transcript from <u>State v. Motts-Voir Dire</u> of Marti Loring ³	4630
Defense Exhibit #45-Partial Transcript from <u>State v. Edens</u> <u>and Holloway</u>	4683
Court’s Exhibit #3-Letter dated April 16, 2009 ⁴	4689
Court’s Exhibit #4-Genogram Chart	(will transport)
Court’s Exhibit #5-Timeline Chart	(will transport)
Court’s Exhibit #6-9-Photos	(will transport)

² Court’s Exhibit # 1 was previously marked and entered into evidence on August 19, 2008. It is included under the exhibits listed for that date.

³ Defense Exhibits # 32-43 were included in the Record on Appeal and are included with the Record on Appeal in this Appendix.

⁴ Court’s Exhibit 3 was included in the Record on Appeal and is included with the Record on Appeal in this Appendix.

Pickett, Marcia

From: Lynch, Martha
Sent: Wednesday, August 27, 2008 12:29 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - NEED YOUR RESPONSE ASAP

I did not see or hear anything from the webcam transmission of the Inman hearing last week.

*Martha C. Lynch, Investigator
 Thirteenth Circuit Solicitor's Office
 305 E. North Street, Suite 325
 Greenville, South Carolina 29601
 864-467-8787*

From: Pickett, Marcia
Sent: Wednesday, August 27, 2008 10:19 AM
To: Allmond, Shirley; DeLoach, Perry; Henderson, Allison; Johnson, Michael; Long, Jeanie; Long, Jeanette; Lynch, Martha; Macfie, Tom; Nealy, Robert; Newton, Christopher; ODonald, Kellie; Riggins, Adrina; Stalvey, Alex; Tiffin, Barbara; Tyre, Mo; Wallace, Matt; Watson, Mary; Webb, Doug; Weston, Jeff
Subject: FW: VERY IMPORTANT - NEED YOUR RESPONSE ASAP
Importance: High

Marcia A. Pickett
 Administrative Coordinator
 Solicitor Robert M. Ariail
 305 East North St., Suite 325
 Greenville, SC 29601
 (864) 467-8282
mpickett@greenvillecounty.org

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Keller, Adair; Riggins, Adrina; Stalvey, Alex; Fretwell, Allen; Henderson, Allison; Brennan, Amy; Eaves, Amy; Phillips, Andrea; Tiffin, Barbara; Lesser, Beth; Pilot, Beth; Strom, Betty; Bouton, Bill; Moseley, Binnie; Townsend, Brennan; Kelley, Brittany; Seay, Bryna; Wilcox, Catherine; Bondurant, Charley; Jarisch, Charlotte; Aaron, Cheryl; Sustakovitch, Christy Kednocker; Clyde, Danny; Downs, Deborah; Sims, Dennis; Matthews, Denton; Kellett, Diane; Reeves, Diane; Webb, Doug; McIntyre, Greta; Steinberg, Howard; 'Jannett Smith'; Long, Jeanette; Hilton, Jeanie; Long, Jeanie; Weston, Jeff; Sullivan, Jeffery; Tessitore, Jennifer; Hennes, John; Gregory, Jon; Phillips, Joni; Monts, Joyce; Steadman, Judy; Anders, Julie; Lowdermilk, Karen; Raines, Kathy; Bevis, Katryna; Sprayberry, Kimberly; Hodge, Kris Bjorndal; Davis, Lauren; Paoletti, Leigh; Whisenhunt, Linda; Kicklighter, Lindsey; Marchant, Lucas; Barker, Marcia; Bustamante, Marie; Boyer, Marilyn; Webb, Marj; Moyer, Mark; Lynch, Martha; Thompson, Martha; Buckner, Mary; Kitchen, Mary; Wallace, Matt; Bishop, Melissa; Graham, Melita; Tyre, Mo; Durham, Nancy; McCall, Pam; Edwards, Pat; Carpenter, Paula; Carter, Rita; Adair, Samantha; Kerley, Sandra; Drawdy, Sara Lee; Kent, Savannah; Stokes, Sharon; Davis, Sherita; Allmond, Shirley; Bass, Sonya; Alderman, Susan; Harrison, Sylvia; Moore, Teresa; Watkins, Tracy; Stolzenbach, Wendy; King, Angie; Anthony, Anita; Robinson, Brittany; Newton, Christopher; Owens, Debbie; Watkins, Donna; Brock, Elizabeth; Campbell, Jennifer; Watson, Joy; Munson, Judy; DeLoach, Perry; Them, Peter; Nealy, Robert; Looper, Teresa; Littleton, Traci; Case, Ashley; Roddy, Heather; Lockhart, Jamila; ODonald, Kellie; Peek, Leisa; Jennings, Lori; Bolivar, Monica;

8/27/2008

4501

Tom Marfie

Pickett, Marcia

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Keller, Adair; Riggins, Adrina; Stalvey, Alex; Fretwell, Allen; Henderson, Allison; Brennan, Amy; Eaves, Amy; Phillips, Andrea; Tiffin, Barbara; Lesser, Beth; Pilot, Beth; Strom, Betty; Bouton, Bill; Moseley, Binnie; Townsend, Brennan; Kelley, Brittany; Seay, Bryna; Wilcox, Catherine; Bondurant, Charley; Jarisch, Charlotte; Aaron, Cheryl; Sustakovitch, Christy Kednocker; Clyde, Danny; Downs, Deborah; Sims, Dennis; Matthews, Denton; Kellett, Diane; Reeves, Diane; Webb, Doug; McIntyre, Greta; Steinberg, Howard; 'Jannett Smith'; Long, Jeanette; Hilton, Jeanie; Long, Jeanie; Weston, Jeff; Sullivan, Jeffery; Tessitore, Jennifer; Hennes, John; Gregory, Jon; Phillips, Joni; Monts, Joyce; Steadman, Judy; Anders, Julie; Lowdermilk, Karen; Raines, Kathy; Bevis, Katryna; Sprayberry, Kimberly; Hodge, Kris Bjorndal; Davis, Lauren; Paoletti, Leigh; Whisenhunt, Linda; Kicklighter, Lindsey; Marchant, Lucas; Barker, Marcia; Bustamante, Marie; Boyer, Marilyn; Webb, Marj; Moyer, Mark; Lynch, Martha; Thompson, Martha; Buckner, Mary; Kitchen, Mary; Wallace, Matt; Bishop, Melissa; Graham, Melita; Tyre, Mo; Durham, Nancy; McCall, Pam; Edwards, Pat; Carpenter, Paula; Carter, Rita; Adair, Samantha; Kerley, Sandra; Drawdy, Sara Lee; Kent, Savannah; Stokes, Sharon; Davis, Sherita; Allmond, Shirley; Bass, Sonya; Alderman, Susan; Harrison, Sylvia; Moore, Teresa; Watkins, Tracy; Stolzenbach, Wendy; King, Angie; Anthony, Anita; Robinson, Brittany; Newton, Christopher; Owens, Debbie; Watkins, Donna; Brock, Elizabeth; Campbell, Jennifer; Watson, Joy; Munson, Judy; DeLoach, Perry; Them, Peter; Nealy, Robert; Looper, Teresa; Littleton, Traci; Case, Ashley; Roddy, Heather; Lockhart, Jamila; ODonald, Kellie; Peek, Leisa; Jennings, Lori; Bolivar, Monica; Hewins, Shemeka; Williams, veronica; Collins, Vicki; Adams, Wanda
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

No

Did you hear or see any of the live feed that occurred before the hearing began?

No

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
 Administrative Coordinator
 Solicitor Robert M. Ariail
 305 East North St., Suite 325
 Greenville, SC 29601
 (864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Matthews, Denton
Sent: Tuesday, August 26, 2008 10:14 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did not hear or see anything.
-Denton

-----Original Message-----

From: Pickett, Marcia
Sent: Tue 8/26/2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
Administrative Coordinator

Pickett, Marcia

From: Stalvey, Alex
Sent: Wednesday, August 27, 2008 10:29 AM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - NEED YOUR RESPONSE ASAP

I did not watch or listen to any of the hearing.

From: Pickett, Marcia
Sent: Wednesday, August 27, 2008 10:19 AM
To: Allmond, Shirley; DeLoach, Perry; Henderson, Allison; Johnson, Michael; Long, Jeanie; Long, Jeanette; Lynch, Martha; Macfie, Tom; Nealy, Robert; Newton, Christopher; ODonald, Kellie; Riggins, Adrina; Stalvey, Alex; Tiffin, Barbara; Tyre, Mo; Wallace, Matt; Watson, Mary; Webb, Doug; Weston, Jeff
Subject: FW: VERY IMPORTANT - NEED YOUR RESPONSE ASAP
Importance: High

Marcia A. Pickett
Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Keller, Adair; Riggins, Adrina; Stalvey, Alex; Fretwell, Allen; Henderson, Allison; Brennan, Amy; Eaves, Amy; Phillips, Andrea; Tiffin, Barbara; Lesser, Beth; Pilot, Beth; Strom, Betty; Bouton, Bill; Moseley, Binnie; Townsend, Brennan; Kelley, Brittany; Seay, Bryna; Wilcox, Catherine; Bondurant, Charley; Jarisch, Charlotte; Aaron, Cheryl; Sustakovitch, Christy Kednocker; Clyde, Danny; Downs, Deborah; Sims, Dennis; Matthews, Denton; Kellett, Diane; Reeves, Diane; Webb, Doug; McIntyre, Greta; Steinberg, Howard; 'Jannett Smith'; Long, Jeanette; Hilton, Jeanie; Long, Jeanie; Weston, Jeff; Sullivan, Jeffery; Tessitore, Jennifer; Hennes, John; Gregory, Jon; Phillips, Joni; Monts, Joyce; Steadman, Judy; Anders, Julie; Lowdermilk, Karen; Raines, Kathy; Bevis, Katryna; Sprayberry, Kimberly; Hodge, Kris Bjorndal; Davis, Lauren; Paoletti, Leigh; Whisenhunt, Linda; Kicklighter, Lindsey; Marchant, Lucas; Barker, Marcia; Bustamante, Marie; Boyer, Marilyn; Webb, Marj; Moyer, Mark; Lynch, Martha; Thompson, Martha; Buckner, Mary; Kitchen, Mary; Wallace, Matt; Bishop, Melissa; Graham, Melita; Tyre, Mo; Durham, Nancy; McCall, Pam; Edwards, Pat; Carpenter, Paula; Carter, Rita; Adair, Samantha; Kerley, Sandra; Drawdy, Sara Lee; Kent, Savannah; Stokes, Sharon; Davis, Sherita; Allmond, Shirley; Bass, Sonya; Alderman, Susan; Harrison, Sylvia; Moore, Teresa; Watkins, Tracy; Stolzenbach, Wendy; King, Angie; Anthony, Anita; Robinson, Brittany; Newton, Christopher; Owens, Debbie; Watkins, Donna; Brock, Elizabeth; Campbell, Jennifer; Watson, Joy; Munson, Judy; DeLoach, Perry; Them, Peter; Nealy, Robert; Looper, Teresa; Littleton, Traci; Case, Ashley; Roddy, Heather; Lockhart, Jamila; ODonald, Kellie; Peek, Leisa; Jennings, Lori; Bolivar, Monica; Hewins, Shemeka; Williams, veronica; Collins, Vicki; Adams, Wanda
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

8/27/2008

4504

Pickett, Marcia

From: Steadman, Judy

Sent: Wednesday, August 27, 2008 10:10 AM

To: Pickett, Marcia

I did not watch the webcast. I have informed all of the PTI staff to respond to you.

Pickett, Marcia

From: Steinberg, Howard
Sent: Tuesday, August 26, 2008 3:59 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

For Bob,

I did not observe or hear anything re: Inman case.

Howard

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

8/26/2008

4506

Pickett, Marcia

From: Stokes, Sharon
Sent: Tuesday, August 26, 2008 4:04 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

Did not see or hear anything...

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
Administrative Coordinator
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305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

8/26/2008

4507

Pickett, Marcia

From: Sullivan, Jeffery
Sent: Wednesday, August 27, 2008 10:10 AM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

NO, I did not watch

Jeffery Y. Sullivan M. Ed, CPSF
Assistant Director
Thirteenth Judicial Circuit
Solicitor's Diversion Programs
305 E. North St., Suite 115
Greenville, SC 29601
(864)467-8719
jsullivan@greenvillecounty.org

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

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I also need to know if you did not observe anything.

8/27/2008

4508

Pickett, Marcia

From: Them, Peter
Sent: Tuesday, August 26, 2008 4:46 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

no

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Thompson, Martha
Sent: Tuesday, August 26, 2008 4:01 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I DID NOT, BECAUSE MINE WOULD NOT PLAY THE VIDEO. AND WE ALL KNOW, I CAN'T HEAR A DARN THING ANYWAY!

Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

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I also need to know if you did not observe anything.

Bob

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Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Tiffin, Barbara
Sent: Wednesday, August 27, 2008 10:20 AM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - NEED YOUR RESPONSE ASAP

Did not watch it on the computer.

From: Pickett, Marcia
Sent: Wednesday, August 27, 2008 10:19 AM
To: Allmond, Shirley; DeLoach, Perry; Henderson, Allison; Johnson, Michael; Long, Jeanie; Long, Jeanette; Lynch, Martha; Macfie, Tom; Nealy, Robert; Newton, Christopher; ODonald, Kellie; Riggins, Adrina; Stalvey, Alex; Tiffin, Barbara; Tyre, Mo; Wallace, Matt; Watson, Mary; Webb, Doug; Weston, Jeff
Subject: FW: VERY IMPORTANT - NEED YOUR RESPONSE ASAP
Importance: High

Marcia A. Pickett
Administrative Coordinator
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305 East North St., Suite 325
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(864) 467-8282
mpickett@greenvillecounty.org

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Keller, Adair; Riggins, Adrina; Stalvey, Alex; Fretwell, Allen; Henderson, Allison; Brennan, Amy; Eaves, Amy; Phillips, Andrea; Tiffin, Barbara; Lesser, Beth; Pilot, Beth; Strom, Betty; Bouton, Bill; Moseley, Binnie; Townsend, Brennan; Kelley, Brittany; Seay, Bryna; Wilcox, Catherine; Bondurant, Charley; Jarisch, Charlotte; Aaron, Cheryl; Sustakovitch, Christy Kednocker; Clyde, Danny; Downs, Deborah; Sims, Dennis; Matthews, Denton; Kellett, Diane; Reeves, Diane; Webb, Doug; McIntyre, Greta; Steinberg, Howard; 'Jannett Smith'; Long, Jeanette; Hilton, Jeanie; Long, Jeanie; Weston, Jeff; Sullivan, Jeffery; Tessitore, Jennifer; Hennes, John; Gregory, Jon; Phillips, Joni; Monts, Joyce; Steadman, Judy; Anders, Julie; Lowdermilk, Karen; Raines, Kathy; Bevis, Katryna; Sprayberry, Kimberly; Hodge, Kris Bjorndal; Davis, Lauren; Paoletti, Leigh; Whisenhunt, Linda; Kicklighter, Lindsey; Marchant, Lucas; Barker, Marcia; Bustamante, Marie; Boyer, Marilyn; Webb, Marj; Moyer, Mark; Lynch, Martha; Thompson, Martha; Buckner, Mary; Kitchen, Mary; Wallace, Matt; Bishop, Melissa; Graham, Melita; Tyre, Mo; Durham, Nancy; McCall, Pam; Edwards, Pat; Carpenter, Paula; Carter, Rita; Adair, Samantha; Kerley, Sandra; Drawdy, Sara Lee; Kent, Savannah; Stokes, Sharon; Davis, Sherita; Allmond, Shirley; Bass, Sonya; Alderman, Susan; Harrison, Sylvia; Moore, Teresa; Watkins, Tracy; Stolzenbach, Wendy; King, Angie; Anthony, Anita; Robinson, Brittany; Newton, Christopher; Owens, Debbie; Watkins, Donna; Brock, Elizabeth; Campbell, Jennifer; Watson, Joy; Munson, Judy; DeLoach, Perry; Them, Peter; Nealy, Robert; Looper, Teresa; Littleton, Traci; Case, Ashley; Roddy, Heather; Lockhart, Jamila; ODonald, Kellie; Peek, Leisa; Jennings, Lori; Bolivar, Monica; Hewins, Shemeka; Williams, veronica; Collins, Vicki; Adams, Wanda
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

Pickett, Marcia

From: Townsend, Brennan
Sent: Tuesday, August 26, 2008 3:57 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did not see or hear anything regarding the hearing.

Brennan C. Townsend
 Assistant Solicitor
 Office of the 13th Circuit Solicitor
 Greenville County Courthouse
 305 E. North Street, Suite 325
 Greenville, SC 29601
 Phone: 864-467-8647
 Fax: 864-467-8610

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

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Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
 Administrative Coordinator

8/26/2008

4512

Pickett, Marcia

From: Wallace, Matt
Sent: Wednesday, August 27, 2008 1:15 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I don't know anything about this.

Mat Wallace

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie O'Donald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Watkins, Donna
Sent: Tuesday, August 26, 2008 4:08 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I was out of town last week and didn't watch any coverage of the hearing.
 Donna Watkins

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

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 Greenville, SC 29601
 (864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Watson, Joy
Sent: Wednesday, August 27, 2008 10:38 AM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did not watch or listen
Thanks Joy Watson

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

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I also need to know if you did not observe anything.

Bob

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mpickett@greenvillecounty.org

Pickett, Marcia

From: Weston, Jeff
Sent: Wednesday, August 27, 2008 11:40 AM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - NEED YOUR RESPONSE ASAP

I didn't see or hear the webcast or the live feed.

Jeff

From: Pickett, Marcia
Sent: Wednesday, August 27, 2008 10:19 AM
To: Allmond, Shirley; DeLoach, Perry; Henderson, Allison; Johnson, Michael; Long, Jeanie; Long, Jeanette; Lynch, Martha; Macfie, Tom; Nealy, Robert; Newton, Christopher; ODonald, Kellie; Riggins, Adrina; Stalvey, Alex; Tiffin, Barbara; Tyre, Mo; Wallace, Matt; Watson, Mary; Webb, Doug; Weston, Jeff
Subject: FW: VERY IMPORTANT - NEED YOUR RESPONSE ASAP
Importance: High

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 305 East North St., Suite 325
 Greenville, SC 29601
 (864) 467-8282
mpickett@greenvillecounty.org

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Keller, Adair; Riggins, Adrina; Stalvey, Alex; Fretwell, Allen; Henderson, Allison; Brennan, Amy; Eaves, Amy; Phillips, Andrea; Tiffin, Barbara; Lesser, Beth; Pilot, Beth; Strom, Betty; Bouton, Bill; Moseley, Binnie; Townsend, Brennan; Kelley, Brittany; Seay, Bryna; Wilcox, Catherine; Bondurant, Charley; Jarisch, Charlotte; Aaron, Cheryl; Sustakovitch, Christy Kednocker; Clyde, Danny; Downs, Deborah; Sims, Dennis; Matthews, Denton; Kellett, Diane; Reeves, Diane; Webb, Doug; McIntyre, Greta; Steinberg, Howard; 'Jannett Smith'; Long, Jeanette; Hilton, Jeanie; Long, Jeanie; Weston, Jeff; Sullivan, Jeffery; Tessitore, Jennifer; Hennes, John; Gregory, Jon; Phillips, Joni; Monts, Joyce; Steadman, Judy; Anders, Julie; Lowdermilk, Karen; Raines, Kathy; Bevis, Katryna; Sprayberry, Kimberly; Hodge, Kris Bjorndal; Davis, Lauren; Paoletti, Leigh; Whisenhunt, Linda; Kicklighter, Lindsey; Marchant, Lucas; Barker, Marcia; Bustamante, Marie; Boyer, Marilyn; Webb, Marj; Moyer, Mark; Lynch, Martha; Thompson, Martha; Buckner, Mary; Kitchen, Mary; Wallace, Matt; Bishop, Melissa; Graham, Melita; Tyre, Mo; Durham, Nancy; McCall, Pam; Edwards, Pat; Carpenter, Paula; Carter, Rita; Adair, Samantha; Kerley, Sandra; Drawdy, Sara Lee; Kent, Savannah; Stokes, Sharon; Davis, Sherita; Allmond, Shirley; Bass, Sonya; Alderman, Susan; Harrison, Sylvia; Moore, Teresa; Watkins, Tracy; Stolzenbach, Wendy; King, Angie; Anthony, Anita; Robinson, Brittany; Newton, Christopher; Owens, Debbie; Watkins, Donna; Brock, Elizabeth; Campbell, Jennifer; Watson, Joy; Munson, Judy; DeLoach, Perry; Them, Peter; Nealy, Robert; Looper, Teresa; Littleton, Traci; Case, Ashley; Roddy, Heather; Lockhart, Jamila; ODonald, Kellie; Peek, Leisa; Jennings, Lori; Bolivar, Monica; Hewins, Shemeka; Williams, veronica; Collins, Vicki; Adams, Wanda
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

8/27/2008

4516

Pickett, Marcia

From: Whisenhunt, Linda
Sent: Tuesday, August 26, 2008 4:11 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did not watch or listen to the webcast transmission of the Inman hearing.

Linda

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

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Solicitor Robert M. Ariail
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Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Williams, veronica
Sent: Tuesday, August 26, 2008 4:26 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did not hear or observe anything on the webcast transmission.

*Veronica V Williams M.Ed CACI
Juvenile Diversion Services
864-467-5908*

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellert; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie O'Donald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

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I also need to know if you did not observe anything.

Bob

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mpickett@greenvillecounty.org

Pickett, Marcia

From: Webb, Doug
Sent: Wednesday, August 27, 2008 10:27 AM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - NEED YOUR RESPONSE ASAP

I was in Pickens for the hearing and did not overhear/see any communication.

Thanks,
 Doug

From: Pickett, Marcia
Sent: Wednesday, August 27, 2008 10:19 AM
To: Allmond, Shirley; DeLoach, Perry; Henderson, Allison; Johnson, Michael; Long, Jeanie; Long, Jeanette; Lynch, Martha; Macfie, Tom; Nealy, Robert; Newton, Christopher; ODonald, Kellie; Riggins, Adrina; Stalvey, Alex; Tiffin, Barbara; Tyre, Mo; Wallace, Matt; Watson, Mary; Webb, Doug; Weston, Jeff
Subject: FW: VERY IMPORTANT - NEED YOUR RESPONSE ASAP
Importance: High

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 Administrative Coordinator
 Solicitor Robert M. Ariail
 305 East North St., Suite 325
 Greenville, SC 29601
 (864) 467-8282
mpickett@greenvillecounty.org

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Keller, Adair; Riggins, Adrina; Stalvey, Alex; Fretwell, Allen; Henderson, Allison; Brennan, Amy; Eaves, Amy; Phillips, Andrea; Tiffin, Barbara; Lesser, Beth; Pilot, Beth; Strom, Betty; Bouton, Bill; Moseley, Binnie; Townsend, Brennan; Kelley, Brittany; Seay, Bryna; Wilcox, Catherine; Bondurant, Charley; Jarisch, Charlotte; Aaron, Cheryl; Sustakovitch, Christy Kednocker; Clyde, Danny; Downs, Deborah; Sims, Dennis; Matthews, Denton; Kellett, Diane; Reeves, Diane; Webb, Doug; McIntyre, Greta; Steinberg, Howard; 'Jannett Smith'; Long, Jeanette; Hilton, Jeanie; Long, Jeanie; Weston, Jeff; Sullivan, Jeffery; Tessitore, Jennifer; Hennes, John; Gregory, Jon; Phillips, Joni; Monts, Joyce; Steadman, Judy; Anders, Julie; Lowdermilk, Karen; Raines, Kathy; Bevis, Katryna; Sprayberry, Kimberly; Hodge, Kris Bjorndal; Davis, Lauren; Paoletti, Leigh; Whisenhunt, Linda; Kicklighter, Lindsey; Marchant, Lucas; Barker, Marcia; Bustamante, Marie; Boyer, Marilyn; Webb, Marj; Moyer, Mark; Lynch, Martha; Thompson, Martha; Buckner, Mary; Kitchen, Mary; Wallace, Matt; Bishop, Melissa; Graham, Melita; Tyre, Mo; Durham, Nancy; McCall, Pam; Edwards, Pat; Carpenter, Paula; Carter, Rita; Adair, Samantha; Kerley, Sandra; Drawdy, Sara Lee; Kent, Savannah; Stokes, Sharon; Davis, Sherita; Allmond, Shirley; Bass, Sonya; Alderman, Susan; Harrison, Sylvia; Moore, Teresa; Watkins, Tracy; Stolzenbach, Wendy; King, Angie; Anthony, Anita; Robinson, Brittany; Newton, Christopher; Owens, Debbie; Watkins, Donna; Brock, Elizabeth; Campbell, Jennifer; Watson, Joy; Munson, Judy; DeLoach, Perry; Them, Peter; Nealy, Robert; Looper, Teresa; Littleton, Traci; Case, Ashley; Roddy, Heather; Lockhart, Jamila; ODonald, Kellie; Peek, Leisa; Jennings, Lori; Bolivar, Monica; Hewins, Shemeka; Williams, veronica; Collins, Vicki; Adams, Wanda
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

8/27/2008

4519

Pickett, Marcia *Open*

From: Robinsen, Brittany
Sent: Tuesday, August 26, 2008 4:04 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I was present for the hearing but I **did not** observe anything over the internet!

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

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I also need to know if you **did not** observe anything.

Bob

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 (864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: King, Angie
Sent: Tuesday, August 26, 2008 4:04 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I watched the hearing in the court room here in Pickens.

Angie

Angela P. King
 Legal Investigator
 Solicitor's Office Thirteenth Judicial Circuit
 Pickens County Courthouse
 214 E. Main Street, B120
 Pickens, South Carolina 29671
 Phone: 864-898-5913
 Fax: 864-898-5798

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

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I also need to know if you did not observe anything.

Bob

8/26/2008

4521

Pickett, Marcia

From: McCall, Pam
Sent: Tuesday, August 26, 2008 4:06 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

No, I did not see or hear anything.

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

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I also need to know if you did not observe anything.

Bob

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Administrative Coordinator
Solicitor Robert M. Ariail
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Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: McIntyre, Greta
Sent: Tuesday, August 26, 2008 4:28 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did not see the hearing.

**GRETA MCINTYRE
 LEGAL INVESTIGATOR
 THIRTEENTH JUDICIAL CIRCUIT
 305 E. NORTH ST., SUITE # 325
 GREENVILLE, SC 29601
 864-467-8648**

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Pickett, Marcia

From: Monts, Joyce
Sent: Tuesday, August 26, 2008 4:04 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did not hear or see any of a live feed.
-Joyce Monts

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Moseley, Binnie
Sent: Tuesday, August 26, 2008 6:03 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did not see or hear any of this hearing.

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Moyer, Mark
Sent: Tuesday, August 26, 2008 5:08 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did not watch or listen to the webcast of the inman hearing so did not observe or hear anything.

Mark

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

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I also need to know if you did not observe anything.

Bob

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Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Munson, Judy
Sent: Tuesday, August 26, 2008 3:57 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

Judy Munson was in Pittsburgh and heard/saw nothing.

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Nealy, Robert
Sent: Wednesday, August 27, 2008 12:40 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - NEED YOUR RESPONSE ASAP

I did not listen to or watch the wecast or live feed.

Robert F. Nealy
 13th Circuit Solicitor's Office
 214 E. Main St., B-120
 Pickens, SC 29671

864-898-5905

rnealy@greenvillecounty.org

From: Pickett, Marcia
Sent: Wed 8/27/2008 10:19 AM
To: Allmond, Shirley; DeLoach, Perry; Henderson, Allison; Johnson, Michael; Long, Jeanie; Long, Jeanette; Lynch, Martha; Macfie, Tom; Nealy, Robert; Newton, Christopher; ODonald, Kellie; Riggins, Adrina; Stalvey, Alex; Tiffin, Barbara; Tyre, Mo; Wallace, Matt; Watson, Mary; Webb, Doug; Weston, Jeff
Subject: FW: VERY IMPORTANT - NEED YOUR RESPONSE ASAP

I did n

Marcia A. Pickett
 Administrative Coordinator
 Solicitor Robert M. Ariail
 305 East North St., Suite 325
 Greenville, SC 29601
 (864) 467-8282
mpickett@greenvillecounty.org

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Keller, Adair; Riggins, Adrina; Stalvey, Alex; Fretwell, Allen; Henderson, Allison; Brennan, Amy; Eaves, Amy; Phillips, Andrea; Tiffin, Barbara; Lesser, Beth; Pilot, Beth; Strom, Betty; Bouton, Bill; Moseley, Binnie; Townsend, Brennan; Kelley, Brittany; Seay, Bryna; Wilcox, Catherine; Bondurant, Charley; Jarisch, Charlotte; Aaron, Cheryl; Sustakovitch, Christy Kednocker; Clyde, Danny; Downs, Deborah; Sims, Dennis; Matthews, Denton; Kellett, Diane; Reeves, Diane; Webb, Doug; McIntyre, Greta; Steinberg, Howard; 'Jannett Smith'; Long, Jeanette; Hilton, Jeanie; Long, Jeanie; Weston, Jeff; Sullivan, Jeffery; Tessitore, Jennifer; Hennes, John; Gregory, Jon; Phillips, Joni; Monts, Joyce; Steadman, Judy; Anders, Julie; Lowdermilk, Karen; Raines, Kathy; Bevis, Katryna; Sprayberry, Kimberly; Hodge, Kris Bjorndal; Davis, Lauren; Paoletti, Leigh; Whisenhunt, Linda; Kicklighter, Lindsey; Marchant, Lucas; Barker, Marcia; Bustamante, Marie; Boyer, Marilyn; Webb, Marj; Moyer, Mark; Lynch, Martha; Thompson, Martha; Buckner, Mary; Kitchen, Mary; Wallace, Matt; Bishop, Melissa; Graham, Melita; Tyre, Mo; Durham, Nancy; McCall, Pam; Edwards, Pat; Carpenter, Paula; Carter, Rita; Adair, Samantha; Kerley, Sandra; Drawdy, Sara Lee; Kent, Savannah; Stokes, Sharon; Davis, Sherita; Allmond, Shirley; Bass, Sonya; Alderman, Susan; Harrison, Sylvia; Moore, Teresa; Watkins, Tracy; Stolzenbach, Wendy; King, Angie; Anthony, Anita; Robinson, Brittany; Newton, Christopher; Owens, Debbie; Watkins, Donna; Brock, Elizabeth; Campbell, Jennifer; Watson, Joy; Munson, Judy; DeLoach, Perry; Them, Peter; Nealy, Robert; Looper, Teresa; Littleton, Traci; Case, Ashley; Roddy, Heather; Lockhart, Jamila; ODonald, Kellie; Peek, Leisa; Jennings, Lori; Bolivar, Monica;

8/27/2008

4528

Pickett, Marcia

From: Newton, Christopher
Sent: Wednesday, August 27, 2008 12:46 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - NEED YOUR RESPONSE ASAP

I did not watch or listen to the webcast of the Inman hearing.

*Christopher L. Newton, Assistant Solicitor
 13th Circuit Solicitor's Office
 214 E. Main St., B-120
 Pickens, SC 29671
 (864) 898-5914 (phone)
 (864) 898-5798 (fax)*

From: Pickett, Marcia
Sent: Wednesday, August 27, 2008 10:19 AM
To: Allmond, Shirley; DeLoach, Perry; Henderson, Allison; Johnson, Michael; Long, Jeanie; Long, Jeanette; Lynch, Martha; Macfie, Tom; Nealy, Robert; Newton, Christopher; ODonald, Kellie; Riggins, Adrina; Stalvey, Alex; Tiffin, Barbara; Tyre, Mo; Wallace, Matt; Watson, Mary; Webb, Doug; Weston, Jeff
Subject: FW: VERY IMPORTANT - NEED YOUR RESPONSE ASAP
Importance: High

Marcia A. Pickett
 Administrative Coordinator
 Solicitor Robert M. Ariail
 305 East North St., Suite 325
 Greenville, SC 29601
 (864) 467-8282
mpickett@greenvillecounty.org

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Keller, Adair; Riggins, Adrina; Stalvey, Alex; Fretwell, Allen; Henderson, Allison; Brennan, Amy; Eaves, Amy; Phillips, Andrea; Tiffin, Barbara; Lesser, Beth; Pilot, Beth; Strom, Betty; Bouton, Bill; Moseley, Binnie; Townsend, Brennan; Kelley, Brittany; Seay, Bryna; Wilcox, Catherine; Bondurant, Charley; Jarisch, Charlotte; Aaron, Cheryl; Sustakovitch, Christy Kednocker; Clyde, Danny; Downs, Deborah; Sims, Dennis; Matthews, Denton; Kellett, Diane; Reeves, Diane; Webb, Doug; McIntyre, Greta; Steinberg, Howard; 'Jannett Smith'; Long, Jeanette; Hilton, Jeanie; Long, Jeanie; Weston, Jeff; Sullivan, Jeffery; Tessitore, Jennifer; Hennes, John; Gregory, Jon; Phillips, Joni; Monts, Joyce; Steadman, Judy; Anders, Julie; Lowdermilk, Karen; Raines, Kathy; Bevis, Katryna; Sprayberry, Kimberly; Hodge, Kris Bjorndal; Davis, Lauren; Paoletti, Leigh; Whisenhunt, Linda; Kicklighter, Lindsey; Marchant, Lucas; Barker, Marcia; Bustamante, Marie; Boyer, Marilyn; Webb, Marj; Moyer, Mark; Lynch, Martha; Thompson, Martha; Buckner, Mary; Kitchen, Mary; Wallace, Matt; Bishop, Melissa; Graham, Melita; Tyre, Mo; Durham, Nancy; McCall, Pam; Edwards, Pat; Carpenter, Paula; Carter, Rita; Adair, Samantha; Kerley, Sandra; Drawdy, Sara Lee; Kent, Savannah; Stokes, Sharon; Davis, Sherita; Allmond, Shirley; Bass, Sonya; Alderman, Susan; Harrison, Sylvia; Moore, Teresa; Watkins, Tracy; Stolzenbach, Wendy; King, Angie; Anthony, Anita; Robinson, Brittany; Newton, Christopher; Owens, Debbie; Watkins, Donna; Brock, Elizabeth; Campbell, Jennifer; Watson, Joy; Munson, Judy; DeLoach, Perry; Them, Peter; Nealy, Robert; Looper, Teresa; Littleton, Traci; Case, Ashley; Roddy, Heather; Lockhart, Jamila; ODonald, Kellie; Peek, Leisa; Jennings, Lori; Bolivar, Monica; Hewins, Shemeka; Williams, veronica; Collins, Vicki; Adams, Wanda
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP

8/27/2008

4529

Pickett, Marcia

From: O'Donald, Kellie
Sent: Wednesday, August 27, 2008 10:37 AM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - NEED YOUR RESPONSE ASAP

Sorry, I did not watch or listen.

-Kellie O'Donald

From: Pickett, Marcia
Sent: Wednesday, August 27, 2008 10:19 AM
To: Allmond, Shirley; DeLoach, Perry; Henderson, Allison; Johnson, Michael; Long, Jeanie; Long, Jeanette; Lynch, Martha; Macfie, Tom; Nealy, Robert; Newton, Christopher; O'Donald, Kellie; Riggins, Adrina; Stalvey, Alex; Tiffin, Barbara; Tyre, Mo; Wallace, Matt; Watson, Mary; Webb, Doug; Weston, Jeff
Subject: FW: VERY IMPORTANT - NEED YOUR RESPONSE ASAP
Importance: High

Marcia A. Pickett
 Administrative Coordinator
 Solicitor Robert M. Ariail
 305 East North St., Suite 325
 Greenville, SC 29601
 (864) 467-8282
mpickett@greenvillecounty.org

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Keller, Adair; Riggins, Adrina; Stalvey, Alex; Fretwell, Allen; Henderson, Allison; Brennan, Amy; Eaves, Amy; Phillips, Andrea; Tiffin, Barbara; Lesser, Beth; Pilot, Beth; Strom, Betty; Bouton, Bill; Moseley, Binnie; Townsend, Brennan; Kelley, Brittany; Seay, Bryna; Wilcox, Catherine; Bondurant, Charley; Jarisch, Charlotte; Aaron, Cheryl; Sustakovitch, Christy Kednocker; Clyde, Danny; Downs, Deborah; Sims, Dennis; Matthews, Denton; Kellett, Diane; Reeves, Diane; Webb, Doug; McIntyre, Greta; Steinberg, Howard; 'Jannett Smith'; Long, Jeanette; Hilton, Jeanie; Long, Jeanie; Weston, Jeff; Sullivan, Jeffery; Tessitore, Jennifer; Hennes, John; Gregory, Jon; Phillips, Joni; Monts, Joyce; Steadman, Judy; Anders, Julie; Lowdermilk, Karen; Raines, Kathy; Bevis, Katryna; Sprayberry, Kimberly; Hodge, Kris Bjorndal; Davis, Lauren; Paoletti, Leigh; Whisenhunt, Linda; Kicklighter, Lindsey; Marchant, Lucas; Barker, Marcia; Bustamante, Marie; Boyer, Marilyn; Webb, Marj; Moyer, Mark; Lynch, Martha; Thompson, Martha; Buckner, Mary; Kitchen, Mary; Wallace, Matt; Bishop, Melissa; Graham, Melita; Tyre, Mo; Durham, Nancy; McCall, Pam; Edwards, Pat; Carpenter, Paula; Carter, Rita; Adair, Samantha; Kerley, Sandra; Drawdy, Sara Lee; Kent, Savannah; Stokes, Sharon; Davis, Sherita; Allmond, Shirley; Bass, Sonya; Alderman, Susan; Harrison, Sylvia; Moore, Teresa; Watkins, Tracy; Stolzenbach, Wendy; King, Angie; Anthony, Anita; Robinson, Brittany; Newton, Christopher; Owens, Debbie; Watkins, Donna; Brock, Elizabeth; Campbell, Jennifer; Watson, Joy; Munson, Judy; DeLoach, Perry; Them, Peter; Nealy, Robert; Looper, Teresa; Littleton, Traci; Case, Ashley; Roddy, Heather; Lockhart, Jamila; O'Donald, Kellie; Peek, Leisa; Jennings, Lori; Bolivar, Monica; Hewins, Shemeka; Williams, veronica; Collins, Vicki; Adams, Wanda
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

8/27/2008

4530

Pickett, Marcia

From: Owens, Debbie
Sent: Tuesday, August 26, 2008 4:29 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did not observe anything.

Debbie Owens
Administrative Assistant
Thirteenth Circuit Solicitor's Office
Pickens County Courthouse
214 E. Main Street, B120
Pickens SC 29671
864-898-5905

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

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Did you hear or see any of the live feed that occurred before the hearing began?

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I also need to know if you did not observe anything.

Bob

Marcia A. Pickett

8/26/2008

4531

Pickett, Marcia

From: Phillips, Andrea
Sent: Wednesday, August 27, 2008 8:16 AM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did not watch it.

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

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Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Pilot, Beth
Sent: Tuesday, August 26, 2008 4:15 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

No to all questions

Beth (Pilot) Reynolds
13th Circuit Solicitor's Office
305 East North St., Ste 325
Greenville, SC 29601
ph: 864-467-8647

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Rice, Leisa
Sent: Tuesday, August 26, 2008 4:14 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

Did not watch. Sorry.
 Did not know it was available to watch.

Leisa Rice
Program Coordinator
Solicitor's Juvenile Diversion Programs
 301 University Ridge
 Greenville, SC 29601
 (864) 467-5902
lrice@greenvillecounty.org

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

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I also need to know if you did not observe anything.

Bob

Pickett, Marcia

From: Riggins, Adrina
Sent: Wednesday, August 27, 2008 1:13 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - NEED YOUR RESPONSE ASAP

I did not observe anything.

From: Pickett, Marcia
Sent: Wednesday, August 27, 2008 10:19 AM
To: Allmond, Shirley; DeLoach, Perry; Henderson, Allison; Johnson, Michael; Long, Jeanie; Long, Jeanette; Lynch, Martha; Macfie, Tom; Nealy, Robert; Newton, Christopher; ODonald, Kellie; Riggins, Adrina; Stalvey, Alex; Tiffin, Barbara; Tyre, Mo; Wallace, Matt; Watson, Mary; Webb, Doug; Weston, Jeff
Subject: FW: VERY IMPORTANT - NEED YOUR RESPONSE ASAP
Importance: High

Marcia A. Pickett
Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Keller, Adair; Riggins, Adrina; Stalvey, Alex; Fretwell, Allen; Henderson, Allison; Brennan, Amy; Eaves, Amy; Phillips, Andrea; Tiffin, Barbara; Lesser, Beth; Pilot, Beth; Strom, Betty; Bouton, Bill; Moseley, Binnie; Townsend, Brennan; Kelley, Brittany; Seay, Bryna; Wilcox, Catherine; Bondurant, Charley; Jarisch, Charlotte; Aaron, Cheryl; Sustakovitch, Christy Kednocker; Clyde, Danny; Downs, Deborah; Sims, Dennis; Matthews, Denton; Kellett, Diane; Reeves, Diane; Webb, Doug; McIntyre, Greta; Steinberg, Howard; 'Jannett Smith'; Long, Jeanette; Hilton, Jeanie; Long, Jeanie; Weston, Jeff; Sullivan, Jeffery; Tessitore, Jennifer; Hennes, John; Gregory, Jon; Phillips, Joni; Monts, Joyce; Steadman, Judy; Anders, Julie; Lowdermilk, Karen; Raines, Kathy; Bevis, Katryna; Sprayberry, Kimberly; Hodge, Kris Bjorndal; Davis, Lauren; Paoletti, Leigh; Whisenhunt, Linda; Kicklighter, Lindsey; Marchant, Lucas; Barker, Marcia; Bustamante, Marie; Boyer, Marilyn; Webb, Marj; Moyer, Mark; Lynch, Martha; Thompson, Martha; Buckner, Mary; Kitchen, Mary; Wallace, Matt; Bishop, Melissa; Graham, Melita; Tyre, Mo; Durham, Nancy; McCall, Pam; Edwards, Pat; Carpenter, Paula; Carter, Rita; Adair, Samantha; Kerley, Sandra; Drawdy, Sara Lee; Kent, Savannah; Stokes, Sharon; Davis, Sherita; Allmond, Shirley; Bass, Sonya; Alderman, Susan; Harrison, Sylvia; Moore, Teresa; Watkins, Tracy; Stolzenbach, Wendy; King, Angie; Anthony, Anita; Robinson, Brittany; Newton, Christopher; Owens, Debbie; Watkins, Donna; Brock, Elizabeth; Campbell, Jennifer; Watson, Joy; Munson, Judy; DeLoach, Perry; Them, Peter; Nealy, Robert; Looper, Teresa; Littleton, Traci; Case, Ashley; Roddy, Heather; Lockhart, Jamila; ODonald, Kellie; Peek, Leisa; Jennings, Lori; Bolivar, Monica; Hewins, Shemeka; Williams, veronica; Collins, Vicki; Adams, Wanda
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

Pickett, Marcia

From: Roddy, Heather
Sent: Tuesday, August 26, 2008 3:58 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I have no clue as to what took place:

Heather Roddy
Greenville County Solicitor's Office
301 University Ridge, Suite 425
Greenville, SC 29601

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

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Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia *Salisbury*

From: ~~Bevis~~, Katryna
Sent: Tuesday, August 26, 2008 4:49 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did not watch or listen to the feed.

KBS

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Sims, Dennis
Sent: Wednesday, August 27, 2008 10:43 AM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did not see anything of the Inman hearing.

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

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 Administrative Coordinator
 Solicitor Robert M. Ariail
 305 East North St., Suite 325
 Greenville, SC 29601
 (864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Smith, Jannett
Sent: Tuesday, August 26, 2008 4:12 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I did go to see the hearing, but left and did not see or hear anything before or during that time.

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

Did you watch or listen to the webcast transmission of the Inman hearing last Tuesday?

Did you hear or see any of the live feed that occurred before the hearing began?

If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

Pickett, Marcia

From: Sprayberry, Kimberly
Sent: Tuesday, August 26, 2008 4:02 PM
To: Pickett, Marcia
Subject: RE: VERY IMPORTANT - PLEASE RESPOND ASAP

I have not heard or seen anything regarding this transmission -

Kim Sprayberry
 Expungement
 467-8723

From: Pickett, Marcia
Sent: Tuesday, August 26, 2008 3:55 PM
To: Adair Keller; Adrina Riggins; Alex Stalvey; Allen Fretwell; Allison Henderson; Amy Brennan; Amy Eaves; Andrea Phillips; Barbara Tiffin; Beth Lesser; Beth Pilot; Betty Strom; Bill Bouton; Binnie Moseley; Brennan Townsend; Brittany Kelley; Bryna Seay; Catherine Wilcox; Charley Bondurant; Charlotte Jarisch; Cheryl Aaron; Christy Kednocker Sustakovitch; Danny Clyde; Deborah Downs; Dennis Sims; Denton Matthews; Diane Kellett; Diane Reeves; Doug Webb; Greta McIntyre; Howard Steinberg; Jannett Smith; Jeanette Long; Jeanie Hilton; Jeanie Long; Jeff Weston; Jeffery Sullivan; Jennifer Tessitore; John Hennes; Jon Gregory; Joni Phillips; Joyce Monts; Judy Steadman; Julie Anders; Karen Lowdermilk; Kathy Raines; Katryna Bevis; Kimberly Sprayberry; Kris Hodge; Lauren Davis; Leigh Paoletti; Linda Whisenhunt; Lindsey Kicklighter; Lucas Marchant; Marcia Barker; Marie Bustamante; MARILYN BOYER; Marj Webb; Mark Moyer; Martha Lynch; Martha Thompson; Mary Buckner; Mary Kitchen; Matt Wallace; Melissa Bishop; Melita Graham; Mo Tyre; Nancy Durham; Pam McCall; Pat Edwards; Paula Carpenter; Rita Carter; Samantha Adair; Sandra Kerley; Sara Drawdy; Savannah Kent; Sharon Stokes; Sherita Davis; Shirley Allmond; Sonya Bass; Susan Alderman; Sylvia Harrison; Teresa Moore; Tracy Watkins; Wendy Stolzenbach; Angie King; Anita Anthony; Brittany Robinson; Christopher Newton; Debbie Owens; Donna Watkins; Elizabeth Brock; Jennifer Campbell; Joy Watson; Judy Munson; Perry DeLoach; Peter Them; Robert Nealy; Teresa Looper; Traci Littleton; Ashley Case; Heather Roddy; Jamila Lockhart; Kellie ODonald; Leisa Peek; Lori Jennings; Monica Bolivar; Shemeka Hewins; veronica Williams; Vicki Collins; Wanda Adams
Subject: VERY IMPORTANT - PLEASE RESPOND ASAP
Importance: High

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If so, I do not want to know what you heard or saw, but I do need to know if you heard or saw anything that occurred before the hearing began.

I also need to know if you did not observe anything.

Bob

Marcia A. Pickett
 Administrative Coordinator
 Solicitor Robert M. Ariail

8/26/2008

4540

Pickett, Marcia

From: Sprayberry, Kimberly
Sent: Wednesday, August 27, 2008 10:10 AM
To: Pickett, Marcia
Subject: RE:

No. I didn't see or hear anything. Was I supposed to?

Kim Sprayberry

Expungement

467-8723

From: Pickett, Marcia
Sent: Wednesday, August 27, 2008 10:08 AM
To: Sprayberry, Kimberly
Subject: RE:

This was a live feed on your computer. Did you see it?

Marcia A. Pickett
Administrative Coordinator
Solicitor Robert M. Ariail
305 East North St., Suite 325
Greenville, SC 29601
(864) 467-8282
mpickett@greenvillecounty.org

From: Sprayberry, Kimberly
Sent: Wednesday, August 27, 2008 10:05 AM
To: Pickett, Marcia
Subject:

Marcia;

I didn't see or hear anything about that trial – We have been moving and unpacking so I have not been watching television.

Kim Sprayberry

Expungement

467-8723

RECEIPT FOR PROPERTY	SLED CASE NUMBER
----------------------	------------------

S.C. LAW ENFORCEMENT DIVISION	LOCATION
-------------------------------	----------

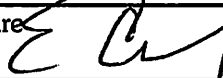
Name of Person Property is Obtained From <input type="checkbox"/> Owner <input type="checkbox"/> Other	Address (Includes Zip Code)
--	-----------------------------

Location of Property



Purpose for Which Obtained

Item Nr.	Quantity	DESCRIPTION OF ARTICLES
#1	one	Inman Webcast

I Certify That I Have Received The Articles Listed Above

Date 8-27-08	Name Elizabeth Corley	Signature 
-----------------	--------------------------	---

CHAIN OF CUSTODY

ITEM NR	DATE	RELINQUISHED BY	RECEIVED BY	PURPOSE OF CHANGE OF CUSTODY
#1	8-27-08	Name Judge Edward Miller	Name Elizabeth Corley	to read file
		Signature 	Signature 	
#1	8-28-08	Name Elizabeth Corley	Name Judge Edward Miller	return file
		Signature	Signature	
		Name	Name	
		Signature	Signature	
		Name	Name	
		Signature	Signature	

Laney - Notes

1. Postpone Laney evaluation at Dept. of Mental Health for several weeks. (Judge Welmaker to sign consent order.)
2. Public Defender to withdraw all motions, memoranda and statements relating to fairness of proceedings.
3. Solicitor to withdraw death notice.
4. Judge Welmaker to find Laney retarded based on evidence already in the record.
5. Judge Welmaker to sentence Laney to life without parole.
6. Laney to be evaluated by Dept. of Mental Health to affirm competency. (Evaluation for retardation unnecessary.) Public Defender to withdraw motion (including all support) relating to competency.

Notes from
Coul Mueller

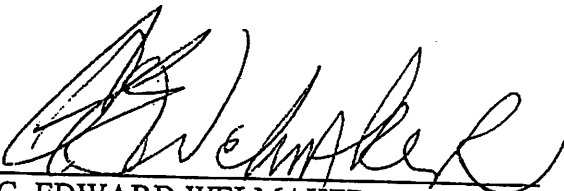
We met w/
family, by
did & want
to do this @
his time.
B



Through cross-examination, the State brought out several factors in the analysis by Dr. Everington which would reflect the absence of mental retardation in Defendant. In addition, the State called as a witness Dr. Pamela Crawford, an expert in the field of psychiatry and forensic psychiatry. Dr. Crawford had examined Defendant during the time before his first trial. Instead of mentally retarded, her diagnosis for Defendant is borderline intellectual functioning. She set forth her reasons from each aspect, along with her observations and prior interactions with Defendant. Both experts were thoroughly cross-examined by the opposing side.

Not every piece of evidence available relating to the mentally retardation issue was likely presented for this pre-trial hearing before the Court. From the opinions of the experts, which have been considered by the Court, Defendant has not met his evidentiary burden by the greater weight. The Court therefore rules that a finding of mental retardation at this time is not warranted by a preponderance of the evidence.

IT IS SO ORDERED.



G. EDWARD WELMAKER
CIRCUIT COURT JUDGE
THIRTEENTH JUDICIAL CIRCUIT

August 20, 2007
Pickens, South Carolina

with

→ We would like it redefined
the concept of "HAND OF ONE" "HAND OF MANY"
IN CONCERT WITH THE TWO SEPARATE CHARGES
OF MURDER.

19. How could you ever find one guilty and
one innocent?

FOREMAN

Doug K. Steiner

2:11 JUNE 23 06

→ WHATEVER TESTIMONY RELATED TO WHERE
JIM COCKMAN'S BODY WAS PLACED IN THE
SUV AT Hwy 11/14 intersection

FOREMAN

Doug K. Steiner

2:13 JUNE 23 06

STATE'S
EXHIBIT
27
4-20-09

Certified Copy
Paul B. Wiseman
Clerk of Court C.P. & G.S.
Greenville County, SC
Dated 4-16-09

COURT'S
EXHIBIT NO. 10
IDENTIFICATION/EVIDENCE
DKT. #
DATE:

Regarding Jennifer Holloway Testimony

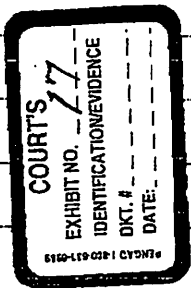
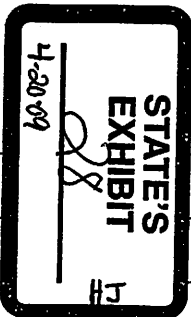
A. we would like any testimony about

1. Her being ordered to tape MR. Cockman
2. Her statements ^{from} ~~and/or~~ Expert witnesses who report that David E. told her to do better job of wrapping.
3. Her statements from expert witnesses that she taped up to or over MR. Cockman's nose.

B. we would like any testimony that relates Jennifer Holloway's experience of being abused by David Edms.

C. we would like any testimony about Jennifer Holloway's past criminal records.

D. Testimony of DR. Watts related her diagnosis (DSM) in comparison to local Doctor at the "jail House". In the context of ["]Did you agree with previous diagnoses?"



Page (2) cont

F. We need any testimony from
DR LORINC and DR Watts with
regards to Jennifer Holloway
taping MR. Cockman.

6/27/06

Foreman

8:23pm

J K Stamen

Verified Copy

Paul B. Wiseman
Clerk of Court C.P. & G.S.
Greenville County, SC

Dated 4-16-09

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STATE OF SOUTH CAROLINA)
) COURT OF GENERAL SESSIONS
COUNTY OF SPARTANBURG)

STATE OF SOUTH CAROLINA,) TRANSCRIPT
) OF
 PLAINTIFF,) RECORD
)
 vs.) 07-GS-42-2773
)
 ANDRES ANTONIO TORRES,)
)
DEFENDANT.)

October 22nd, 2008
Spartanburg, South Carolina

B E F O R E:

THE HONORABLE ROGER L. COUCH, Judge, and a jury.

Certified Copy of Testimony of Dr. Marti Loring.



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STATE OF SOUTH CAROLINA)
COUNTY OF SPARTANBURG) COURT OF GENERAL SESSIONS

STATE OF SOUTH CAROLINA,) TRANSCRIPT
PLAINTIFF,) OF
VS.) RECORD
ANDRES ANTONIO TORRES,) 07-GS-42-2773
DEFENDANT.)

October 22nd, 2008
Spartanburg, South Carolina

B E F O R E:

THE HONORABLE ROGER L. COUCH, Judge, and a jury.

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1
2
3 I N D E X O F W I T N E S S E S

4 WITNESSES PAGE

5
6 MARTI LORING - Out of Jury's presence

7 Direct examination by Mr. Allen 4

8 Cross-examination by Sol. Gowdy 14

9 MARTIN LORING

10 Direct examination by Mr. Allen 23

11 Cross-examination by Sol. Crick 64

12
13 Certificate 79

1 P R O C E E D I N G S

2
3 (Whereupon, the following takes place outside the
4 presence of the jury.)

5 THE COURT: All right. You indicated during our bench
6 conference that perhaps the next witness would involve the
7 charts that we discussed earlier, is that right, Mr. Allen?

8 MR. ALLEN: Yes, Your Honor.

9 THE COURT: Let's go ahead and take whatever proffer
10 you wish to offer on those, that, particularly the chart
11 that's been objected to.

12 So, do you want to call that particular witness at this
13 time?

14 MR. ALLEN: Yes, Your Honor.

15 Marti Loring.

16 THE COURT: Ma'am, come forward to the witness stand to
17 my right to be sworn please.

18 WITNESS: Yes, sir.

19 MARTI LORING, being first duly
20 sworn, testified as follows:

21 THE COURT: All right, ma'am. Please have a seat in
22 the witness stand.

23 WITNESS: Thank you, Your Honor.

24 THE COURT: And once you're seated I'd ask that you
25 state your name for the record.

1 WITNESS: Yes, sir.

2 Doctor Marti Loring.

3 THE COURT: Mr. Allen, your witness.

4 MR. ALLEN: Thank you, Your Honor.

5 DIRECT EXAMINATION

6 BY MR. ALLEN:

7 Q Doctor Loring, I'm gonna ask you a few questions
8 concerning the charts and things that you brought, but I
9 first want to ask you can you give us your educational
10 background please?

11 A Certainly.

12 I went to Vassar College in Poughkeepsie, New York for
13 my undergraduate degree where I majored in psychology. Then
14 I went on to Brynmore College Graduate School, Social Work,
15 and Social Research. Got my social work degree. And then I
16 was out in the field for a while and went to Emory
17 University in Atlanta where I got my Doctorate in Sociology
18 where I majored in social psychology.

19 Q Okay. And also how have you been employed?

20 A I'm director of the Center for Mental Health and Human
21 Development in Atlanta, Georgia at this time.

22 Q How long have you held that position?

23 A Since 1979.

24 Q Okay. And can you tell me a little bit about what the
25 center does?

1 A Yes, sir.

2 Of course, we do evaluations. Sometimes we're asked to
3 share information in Court. We do research where we look at
4 areas of trauma, abuse, leadership, and explore ways to help
5 people, what's going on in those areas, what causes people
6 to be traumatized, how trauma affects people both when
7 they're a child and as they grow older. We do training
8 across the country in areas of, all areas really related to
9 trauma and abuse. And we do some media education to help
10 people understand about, about trauma and abuse.

11 Q Okay. And as a part of this, have you served the
12 police in courts in the area of trauma and abuse?

13 A I beg your pardon, sir?

14 Q Have you served the police in courts in the area of
15 trauma and abuse?

16 A Yes, sir, I have.

17 Q Okay. Have you been, have you been qualified to
18 testify in other Courts?

19 A Yes, sir, I have.

20 Q In what areas of expertise?

21 A Yes, sir, battered person syndrome, development,
22 trauma, abuse, and forensic interviewing, and social
23 historian.

24 Q And as part of your areas, do you also perform
25 psychosocial assessments?

1 A Yes, sir, I do.

2 Q And do you also create charts or do you create gen,
3 genograms specifically?

4 A Yes, sir, I do create genograms.

5 Q And what kind of -- I mean tell us, in general, what a
6 genogram is and how it's used.

7 A A genogram is like a family tree. It's meant for
8 people who are being a social historian, like I sometimes
9 am, to show not only who the relatives of the individual
10 whom I'm evaluating, but what important information can be
11 shown about these relatives. So, for example, if there's
12 certain kinds of problems or illnesses or issues that are
13 found not just in the one person whom I've evaluated, but in
14 the whole family, other people within the family, we find
15 it's important to show that because a lot of times a person
16 will learn from what he or she sees, and will pick up on
17 certain kinds of behavior problems that are seen in other
18 members of the family.

19 Sometimes other members of the family kind of inflict
20 or impose the behavior problems on the person who, who we're
21 evaluating. So, it's important to show that.

22 And thirdly, often there are types of problems that
23 occur within whole families. An example would be you find
24 alcoholism or mood disorders often in a number of people
25 within that family. And still another purpose for the

1 genogram is you can show relationships between the person
2 you're evaluating and other members of the family can show
3 if there's been physical abuse, for example, or abandonment
4 so that when you look at the genogram, you see, using the
5 colors, and the symbols, what are the, what are the problems
6 in the, in the family, what are the tendencies, what kind of
7 relationships did the person you're evaluating have with
8 different members of the family, and, and they with him or
9 her. It's like a big snapshot to show the history of an
10 individual's life.

11 Q And is this a tool that's used by people in your area?

12 A Yes, sir, most people -- excuse me. Most people who
13 are doing social histories will create and share a genogram
14 in order to be thorough.

15 Q Okay. And again, we're talking your area concerning
16 sociology, psychosocial assessments as a life historian in
17 death penalty cases, is that right?

18 A Well, yes, sir, that is correct.

19 Q Okay. And what is the methodology that's used for
20 creating a genogram?

21 A Well, there are a number of methods. One is to
22 interview numerous family members and get information from
23 them, often individually, to see if there's any discrepancy
24 and sometimes together to see how they interact. Then it's
25 helpful to review records to, to learn from many others,

1 through the years, what they have observed, diagnosed, and
2 found about the individual. You incorporate that into the
3 genogram as well.

4 It's sometimes useful to check with other professionals
5 like a family physician or a mental health provider to make
6 sure that the information that you're presenting you have
7 more than one person usually sharing that kind of
8 information with you about different aspects of the person's
9 life. And it's sometimes useful to find out what other
10 individuals who have interviewed your client have found as
11 well at different points in his or her life or performed
12 tests, that kind of thing.

13 Q And did you follow that methodology in this case?

14 A Yes, sir.

15 Q And did you create a genogram?

16 A Yes, sir.

17 Q And do you have it with you?

18 A Yes, sir.

19 Q Okay. If I may---

20 A Please.

21 Q ---retrieve it.

22 And this has been marked as Defense Exhibit 2 for
23 identification. I'm trying to show it to the Court and to
24 the, the opposing side at the same time.

25 How did you go about creating this?

1 A I reviewed a great deal of records, interviewed some
2 individuals who had met with Tony Torres during earlier
3 parts of his life, interviewed family members, and put this
4 together to try to reflect the family relationships and
5 dynamics and individuals, struggles within the family,
6 individual, people in the family and their behavior
7 problems.

8 Q And is this a, a chart of your opinions or summaries of
9 your interviews and review of records and other information
10 that you've gathered?

11 A Yes, sir, that is what it is.

12 Q Okay. And does this reflect your opinion of the, the,
13 of Tony Torres' genogram?

14 A Yes, sir, it does.

15 Q And you are trying -- can you show the Court what it is
16 that you're trying to reflect on this genogram?

17 If you need to stand up or something, I, to show the
18 Court or---

19 A I'm, I'm wondering if you'd like me to go through the
20 whole thing?

21 Q If you would please.

22 A Yes, sir.

23 Then I shall stand up in order to be able to point it
24 out to the---

25 Q If you need, if you need to or if you'd like to.

1 A I'd be glad to. Thank you so much.

2 Thank you.

3 Q Make sure that the solicitor can see as well.

4 SOLICITOR GOWDY: It's more important that the judge --
5 if the judge doesn't mind me moving to that there---

6 THE COURT: No, you can come right there. That will be
7 fine.

8 WITNESS: May I get closer?

9 THE COURT: That's fine. I can read it.

10 WITNESS: Thank you, Your Honor.

11 THE COURT: In fact, there's an easel you can put it
12 on.

13 WITNESS: Thank you so much.

14 Your Honor, here we have Tony Torres, and primarily

15 you'll see squares. I'm talking about men. That's a

16 square. And circles, I'm talking about the women.

17 Sometimes there's a larger square that can even be around

18 the women. But that's to, to indicate some symbol which

19 I'll describe for, to you.

20 where you see yellow, it's alcoholism or alcohol
21 problems.

22 Pink is panic disorder.

23 Green, mentally ill. In this family primarily is
24 depression.

25 A blue is bipolar disorder.

1 Red, violence.

2 And those colors mean to indicate those things. And a
3 little plus indicates drug addiction, struggle with drugs.

4 So, you have Tony Torres who has yellow indicating
5 alcohol problems with a border of blue indicating bipolar
6 disorder. The plus indicates the struggle with drugs.

7 And Your Honor, we have the red indicating some violent
8 acts on his part. And where you see the, the side, that's
9 white, that indicates a criminal history, judge.

10 Now, going up, you see his biological father, Andy
11 Torres, and his biological mother, Lisa Lamb. So, we have
12 these two, Lisa and Andy, and then coming down you have
13 their son, Tony.

14 THE COURT: What's the significance of the purple
15 zigzag line?

16 WITNESS: Your Honor, this indicates physical abuse by
17 the father, Andy, toward his son, Tony.

18 THE COURT: I didn't see that on your legend. That's
19 the reason I was asking you that.

20 WITNESS: Right.

21 THE COURT: Okay. Go ahead.

22 WITNESS: And the other thing you don't see, Your
23 Honor, is the dotted line separated as such indicates
24 abandonment.

25 THE COURT: Okay.

1 WITNESS: Different types of it.

2 THE COURT: Okay.

3 WITNESS: Shall I continue?

4 THE COURT: I think I've got the gist of it.

5 WITNESS: Thank you, Your Honor.

6 Q And you've interviewed a number of people in connection
7 with this case, is that correct?

8 A Yes, sir.

9 Q Have you interviewed, for example, Andy Torres?

10 A Yes, sir.

11 Q Okay. And of course, Lisa Lamb?

12 A Yes, sir.

13 Q Tony Torres?

14 A Yes, sir.

15 Q And any others connected on here?

16 A The brother, F.B., Aunt Donna, Aunt Tammy, Aunt Paula,
17 and Aunt Pam, Grandma Glenda, Cousin Amanda, Cousin Jessica,
18 and a number of what we call collateral witnesses, people
19 who aren't related to the family, but had some contact with
20 Tony through the years.

21 Q Okay. Of course, you indicated that you've reviewed
22 records in connection with Tony's case, is that right?

23 A Many records.

24 Q Would that include records of Continuum of Care?

25 A Yes, sir.

1 Q Also mental records, would that---

2 A Yes, sir, mental health.

3 Q Mental health records, hospitalization records?

4 A Yes, sir.

5 Q The legal history, history records like the Court
6 records and that kind of thing like convictions?

7 A Yes, sir.

8 Q Okay. Records from Department of Corrections?

9 A Yes, sir.

10 Q And the jail?

11 A Yes, sir.

12 Q Okay. And before you make a conclusion, do you, how do
13 you go about verifying a fact upon which you base a
14 conclusion?

15 A Well, I try to verify it with more than one individual,
16 if possible. And when I can talk with a family doctor, as I
17 did with these two young ladies, they gave me permission,
18 then I do that.

19 There's a mistake. This should be Continuum of Care.
20 I apologize.

21 Q Okay. Is this the -- now, the, the, the method that
22 you used in these interviews that you conducted, is that
23 the -- how does that compare with the general methodology
24 accepted in, in your expert, area of expertise in creating a
25 genogram?

1 A That's the way you're suppose to do it.

2 Q I mean is that done by other people in your field?

3 A Yes, sir, it is.

4 Q And you, and you use that same methodology?

5 A Yes, sir, I do.

6 MR. ALLEN: Okay. That would be my showing, Your
7 Honor.

8 THE COURT: All right. Ma'am, you can have a seat back
9 in the witness stand.

10 WITNESS: Thank you, judge.

11 THE COURT: You want to move that around where she can
12 see it. I've, I've seen it close enough. I know what -- I
13 think I have a good idea of what it says.

14 You may cross-examine on this point.

15 SOLICITOR GOWDY: Thank you, Your Honor.

16 CROSS-EXAMINATION

17 BY SOLICITOR GOWDY:

18 Q Good afternoon, ma'am.

19 A Hello, sir.

20 Q What evidence do you have that Jessica and Amanda are
21 bipolar?

22 A Yes, sir.

23 The first thing I did was to speak with family members.
24 Particularly their mothers. Jessica---

25 Q Let me, let me ask you a little better question.

1 A Yes, sir.

2 Q All right. What evidence do you have that reaches a, a
3 degree of medical certainty that they are bipolar?

4 A Well, I spoke with their doctor, Doctor McAlhane.

5 Q All right.

6 A And so---

7 Q And they've both been diagnosed as being bipolar?

8 A Jessica has been diagnosed as bipolar and he felt that
9 Amanda was too, but had big anxiety issues. So, he would
10 see them as possibly both being true, but anxiety being the
11 primary diagnosis from Amanda with bipolar issues as well.
12 We're allowed to give more than one diagnosis or make one
13 stronger than the other.

14 Q Well, let me ask -- I guess I shouldn't of started with
15 this.

16 What exactly are you expressing your opinion on?

17 If you're an expert, what is the opinion?

18 A My opinion is that Tony Torres grew up in a family
19 where there were significant problems among other members of
20 his family that affected him greatly. So, that is the
21 opinion. And this is trying to break that opinion down to
22 show you well, what other members of the, of the family had
23 difficulties and how indeed did those difficulties affect
24 young Tony growing up.

25 Q Well, he was not in the home most of the time you would

1 agree, right?

2 I mean he was, he was either in Charleston or he was in
3 Pioneer Ridge or he was in the Hall Institute.

4 Agreed?

5 A Yes, sir, you're absolutely right, at a certain point.
6 At about four years old is when he first started going into
7 hospitals and going into these homes. So, the period up to
8 four years old comes very important in understanding his
9 history. In addition to that, when he was in these places
10 that you accurately mentioned, there were issues about him
11 coming home on weekends and holidays. So, he still did have
12 the tying the bond to home and the great desire to come
13 home.

14 Q well, we'll save that for a second.

15 what does any of that have to do with those two being
16 bipolar, one of whom is not been diagnosed as being bipolar?

17 I mean they weren't alive when he was three years old.

18 A well, one is diagnosed as thought to have bipolar, but
19 greater anxieties issues, and the other as having bipolar.
20 Yes, sir, you're quite right. And I'm sorry if I didn't
21 explain it well.

22 But within a family, you have certain kinds of problems
23 which are thought by people in the mental health profession
24 to have, some of them have a chemical basis. So, for
25 example, with bipolar, we really wouldn't expect to have one

1 lone person in a large family with a, bipolar disorders. We
2 would expect to be able to look and see other individuals
3 within the family with bipolar and also, as Doctor McAlhaney
4 phrased it, mood disorders cause we often see mood disorders
5 as resting on the chemicals within our body too---

6 THE COURT: Mr. Solicitor, my -- excuse me, ma'am.

7 WITNESS: Certainly.

8 THE COURT: My understanding of the inquiry at this
9 time is -- I'm, I'm looking at Rule 703 and it's the -- it
10 says there that, of course, an expert has the right to base
11 their opinion or inferences on matters which have been made
12 known to the expert before the witness, before this hearing,
13 excuse me, and that those things may not be admissible in
14 evidence, some of the things that they base their opinion
15 on. The question is, is the information of a type that's
16 reasonably relied upon experts in that particular field in
17 formulating the opinion.

18 So, I guess the question that I'm focusing on is
19 whether or not that particular methodology, methodology is
20 the one that is reasonably relied upon by people within her
21 field. And I -- you seem to be going more toward the weight
22 of the testimony than to whether or not the methodology was
23 correct. So---

24 SOLICITOR GOWDY: well, and I apologize for doing that,
25 Your Honor. I, I guess my first question, and I should of

1 started with what is, what is her opinion because until I
2 know what her opinion is, I don't know whether or not---

3 THE COURT: well, you've asked that question, and I'm,
4 I, I was interested in that answer. But I don't know if we
5 need to get into the, to the weight of that information as
6 opposed to whether or not she is used a proper methodology
7 by people within the field that she's, claims to be an
8 expert in.

9 SOLICITOR GOWDY: would the Court still allow me to
10 make a 403 argument?

11 THE COURT: Yes, sir. Go ahead. You can.

12 SOLICITOR GOWDY: well, from a 403 standpoint, we've
13 heard now from there different doctors that he's bipolar.
14 And to, to have a fourth come in is cumulative and, and
15 frankly doesn't need to be proven by a fact that Jessica
16 Amanda, who on this chart, aren't even related directly to
17 him. I, from a relevant standpoint, I don't know why people
18 he lived with being anxious has anything to do with him.

19 THE COURT: I'll hear from you.

20 Now, he, he -- now the focus is on Rule 403 and that
21 objection is to needless presentation of cumulative
22 evidence, and I suppose that's where we are. That's what
23 that rule talks about.

24 MR. ALLEN: well, Your Honor, this is secondly in part
25 to demonstrate Tony's life. Also some of the relationships.

1 I also recall the testimony of Doctor Schwartz-Watts and I
2 believe she said that bipolar is, may run in the families or
3 may find it's genetic to that. That's number two.

4 The -- Jessica is related to Mr. Torres. She is the
5 daughter of the sister of his mother. So, this would tend
6 to support Doctor Schwartz-Watts' opinion or her diagnosis
7 and also tends to again show my, my client's life and his
8 family history. And I believe that, under, counsel may
9 state we have the right to put up his life history and
10 that's what we're attempting to do, and I believe that the
11 genogram can be a---

12 THE COURT: All right. And Mr. Solicitor, I'll hear
13 you in response.

14 SOLICITOR GOWDY: Your Honor, only that unless there's
15 been some foundation laid that he had a relationship with
16 them, that, you know, if -- the fact that somebody's a
17 family member, if they were never around them, if they never
18 abused them, and absent some genetic testimony that there's
19 a linkage, I don't see the relevance of a great uncle of
20 being an alcoholic. If that alcoholism didn't result in any
21 harm being done to him, and there's no genetic link, then I
22 don't know the relevance of it.

23 THE COURT: All right. I think I understand the
24 arguments. We're in a break right now. We'll take about a
25 ten minute break. I'll announce my ruling upon my return.

1 Court's in recess for about ten minutes.

2 Everyone remain seated while the defendant retires.

3 (Whereupon, a short recess was taken at this time.)

4 THE COURT: All right. I have reviewed the proposed
5 chart in context with Rule 403 and 705 and I'm gonna allow
6 it to be used by this witness in her testimony. I do note
7 that the diagnosis of bipolar has been already made and
8 placed in the record. However, there was testimony by that
9 witness, Mrs. Schwartz-Watts, that the, that condition is
10 somewhat hereditary. She expects to find it in other
11 members of the family. And the indication on the chart
12 would be that perhaps they're others.

13 Certainly you can cross-examine on the weight and
14 comment on the weight all you like, Mr. Solicitor. That's
15 your prerogative and right. But as far as it being unduly
16 cumulative or not following the proper procedure within the
17 field, I am going to allow it.

18 Anything further before we bring the jury in?

19 MR. ALLEN: Your Honor, if it please the Court.

20 Maybe we should go through---

21 THE COURT: You want to look at the photographs?

22 I know that was an issue. We didn't address that
23 earlier. But---

24 MR. ALLEN: Yes, sir.

25 THE COURT: ---I, I said I'd consider those objections

1 contemporaneously with the introduction of those things.

2 Solicitor, you want to -- I think he may want to
3 discuss that with you. I'll give you a moment to do so.

4 (Pause.)

5 SOLICITOR GOWDY: Your Honor, can Mr. Allen and I
6 approach just for a second?

7 THE COURT: Yes, sir. Please do.

8 (Whereupon, a bench conference was held at this time.)

9 THE COURT: All right. We've had an opportunity to
10 review the photos at the bench.

11 Based on our discussions, I believe you've agreed to
12 withdraw several of the photographs.

13 Can you identify them for me?

14 MR. ALLEN: I have -- Your Honor, they have been
15 previously marked as Defense Exhibit 7, 9, 10, and 15.

16 THE COURT: Okay. Those have been withdrawn and the
17 others I have indicated that I, I don't see a problem with
18 those.

19 Although, have they been offered into evidence at this
20 point in time?

21 MR. ALLEN: They have not been offered into evidence at
22 this time. I would like to -- I mean---

23 THE COURT: Let's, let's do it through her testimony.
24 I had indicated though, at this point in time, I have no
25 problem. Doesn't preclude you from raising any objection

1 that you'd like to put on the record.

2 SOLICITOR GOWDY: Yes, sir.

3 THE COURT: Okay. Now, anything else that we need to
4 go over before we bring the jury in from the State's point
5 of view?

6 SOLICITOR GOWDY: No, sir, Your Honor.

7 THE COURT: From the defendant's point of view?

8 MR. ALLEN: No, Your Honor.

9 THE COURT: Mr. Humphries, bring the jury in.

10 Ma'am, if I can get you to step down. You'll need to
11 be sworn in the presence of the jury. So, if you would step
12 down briefly.

13 WITNESS: Certainly.

14 THE COURT: You can leave your material there.

15 WITNESS: Thank you, Your Honor.

16 THE COURT: You can just have a seat. Just have a seat
17 right back there and then we'll call you when the jury is in
18 the courtroom.

19 WITNESS: Thank you, Your Honor.

20 THE COURT: Mr. -- all right. Mr. Humphries, you may
21 bring the jury in.

22 (Whereupon, the following takes place within the
23 presence of the jury.)

24 THE COURT: All right. The jury has returned to the
25 courtroom.

1 The defense may call its next witness.

2 MR. ALLEN: We call Doctor Marti Loring please.

3 THE COURT: Ma'am, come forward to the witness stand to
4 be sworn.

5 DOCTOR MARTI LORING, being first
6 duly sworn, testified as follows:

7 THE COURT: Ma'am, once you're seated in the witness
8 stand, please state your name for the record.

9 WITNESS: Yes, sir.

10 Doctor Marti Loring.

11 THE COURT: Mr. Allen, it's your witness.

12 DIRECT EXAMINATION

13 BY MR. ALLEN:

14 Q Doctor Loring, and, and for the record, can you spell
15 your first name -- how do you spell your last name?

16 A M-A-R-T-I.

17 Q Okay. And can you please tell me where you work?

18 A Yes, sir, I work at the Center for Mental Health and
19 Human Development in Atlanta, Georgia.

20 Q And what position do you hold there?

21 A I'm the director of the center.

22 Q And what does that center do?

23 A We're, we're a center where some individuals work with
24 us a, part-time, some full-time, and others in the community
25 come to join us when we have a large project. We, for one

1 thing, respond to community crises like the courthouse
2 shooting in Atlanta a couple of years ago. We go out to
3 help those involved like the deputies with trauma issues.

4 Second thing that I do, and we do at the center, is we
5 do research into areas of trauma and abuse.

6 Thirdly, we do a training and education, education
7 across the country in those same areas, trauma, abuse,
8 social history kinds of trainings, and like that.

9 And lastly, we do media education. Sometimes I or
10 others will appear on television to try to help people
11 understand what is, what is abuse and trauma, all of that,
12 and how it can affect people at different times of their
13 lives.

14 Q Okay. And have you been qualified in the Courts of
15 South Carolina as an expert?

16 A Yes, sir, I have.

17 Q Okay. And other states?

18 A Yes, sir, several other states.

19 Q What is your education and background please like where
20 you went to school and your principal areas of study?

21 A Yes, sir, I went to undergraduate college up in
22 Poughkeepsie, New York at Vassar College where I majored in
23 psychology. Then I went to just outside of Philadelphia,
24 Brynmore Graduate School of Social Work and Social Research
25 where I studied sociology, social work, and abuse, and the

1 like. I got a Master's Degree.

2 I was out in the field for a while in agencies working,
3 and then I, I went back after several years to Emory
4 University in Atlanta, Georgia where I got my Ph.D. in
5 Sociology with a Major in Social Psychology. So, I went on
6 to become a clinical sociologist.

7 Q what is a clinical sociologist?

8 A A clinical sociologist is someone who studies not just
9 the individual, but the, the individual in relation to his
10 or her family. what are the kind of things going on in the
11 family that could affect that individual, what does the
12 individual do that can affect the family.

13 And then also, even broader than the family, what are
14 the culture issues that are going on, what are the different
15 institutions. You know, hospitals, schools, how, how do
16 they affect the individual as well, that kind of thing, for
17 clinical sociologist.

18 Q Have you also conducted studies in life history or in
19 life history to particular individuals?

20 A Yes, sir, I have.

21 Q And have you also made psychosocial assessments?

22 A Yes, sir.

23 Q Can you tell me what that is?

24 A A psychosocial, a psychosocial evaluation is an
25 evaluation of the individual in relationship to the social

1 things going on around him or her like the family and the
2 like. A life history is studying all the things that
3 affected a person during their lives, studying all the
4 documents that are obtained about all the experiences that
5 that person has in their family and school and hospital,
6 whatever. And then interviewing a lot of people too for
7 social history. People who were in the family, who observed
8 the individual, and what we call collateral witnesses. And
9 that would be people who are not in the family who may of
10 helped the individual at different times in, in the life or
11 observed them. We interview them as well to do a life
12 history.

13 Q Okay. Have you also written books or articles?

14 A Yes, sir.

15 Q And can you tell us in general about your writing?

16 A Well, I've written two books on emotional abuse, which
17 is one area of specialty that I've studied and done research
18 on, and then several articles having to do with how trauma
19 can affect the person growing up, how it can stick with a
20 child long into their adult lives, their experiences with
21 trauma, how it affects them, how abuse affects people,
22 articles about leadership, and articles about hot lines for
23 people who are depressed to call up and get help, articles
24 about people who are battered like battered women. Those
25 are some of the topics that I've covered in the articles

1 I've written and that I've had the pleasure of working with
2 others on, on writing as well.

3 Q Okay. Have you served the various law enforcement
4 agencies and the Courts in areas of say trauma and abuse
5 that you've mention?

6 A Yes, sir, we have. I mentioned earlier that we were
7 able to help during the courthouse shootings. The fire
8 department in Atlanta asked us to help. We helped during
9 the Olympic bombings as well with some of the officials and
10 the family members who had dealt with the, the bombings.
11 We've helped the Court or we've helped train sometimes in
12 for both defenders and prosecutors or solicitors and
13 consulted in various cases.

14 Q What professional organizations do you belong to?

15 A A number of professional organizations including the
16 Academy of Traumatic Stress, the National Association of
17 Social Workers and Sociologist, and the, the local
18 organization of social workers. Also the American, the
19 Psychological Association of the Women's Division.

20 MR. ALLEN: Your Honor, at this time I offer Doctor
21 Loring as an expert in the area of clinical sociology,
22 family history, and psychosocial assessment evaluations.

23 THE COURT: Objection?

24 SOLICITOR CRICK: No, sir.

25 THE COURT: Without objection, she'll be received as

1 such.

2 You may proceed.

3 MR. ALLEN: Thank you, Your Honor.

4 Q Doctor Loring, were you asked to conduct a study on the
5 history of Tony Torres?

6 A Yes, sir, I was.

7 Q And can you tell us how do you prepare a social history
8 on an individual such as Tony Torres?

9 In general, how do you do that?

10 A Well, in general, I reviewed documents about that
11 particular person, and if there's some reason about a
12 relative as well. I interview family members. I also, as I
13 mentioned earlier, interview the collateral witnesses,
14 individuals who aren't in the family, and I certainly spend
15 time interviewing the, the person himself or herself, the
16 individual whom I'm preparing the history about.

17 I think that pretty much covers it. The documents, the
18 individual himself or herself, family members, collateral
19 witnesses.

20 I look at pictures too. I try to get pictures from the
21 family and then I talk with them about what the pictures,
22 they think the pictures portray, and I get an idea of how
23 old was the person at these different times. And as I put
24 together a time line of what was going on during different
25 periods of the individual's life, I look to see whether

1 they're pictures that help understand, help demonstrate, and
2 get a feel for how the person looked and was at that time.

3 Q Okay. And did you do that in this case?

4 A Yes, sir, I did.

5 Q Okay. You looked, you looked at a variety of documents
6 and interviewed a number of people?

7 A Yes, sir, I did.

8 Q Okay. And what -- in, in discussing the, the social
9 history of Tony Torres, you were taking it from what point
10 in his life to or did you end at a particular point or do
11 you take it up all the way to today or what do you do?

12 A I take it to, from before they were born, maybe while
13 their mom was pregnant with them, for example, up until a
14 period of time prior to some incident that has occurred,
15 sometimes a tragedy, in which another professional takes up
16 the study at that point rather than myself.

17 Q And in this case, you were asked to study him from the
18 beginning to, up to May 11th of 2007?

19 A Basically, yes, sir. Although there was another
20 professional who took up the time immediately preceding just
21 before May 11th.

22 Q Okay. So, not quite to May 11th then.

23 Is that what you're saying?

24 A That is correct, sir.

25 Q Okay. Thank you.

1 A You're welcome.

2 Q And did you prepare anything today as far as a, charts?

3 A Yes, sir, I did.

4 Q What, and what did you prepare?

5 A I prepared a, three charts which, which was our
6 genogram, a family tree, a time line, and a chart that
7 illustrates something that's discussed in the time line, and
8 then I also prepared several pictures, had them enlarged to
9 be easier for me to show.

10 Q Okay. Now, before I get to that part, I mean what
11 types of reports or documents did you review in this case?

12 A I reviewed a, police records, Continuum of Care
13 records, which was the organization that help guide the
14 different kinds of treatment which Tony Torres had, hospital
15 records of his treatment, and I'm not gonna list them. I'll
16 list them out if you wish.

17 Q No, I mean in general.

18 A In general, yes, sir.

19 Parole records, SCDC records, school educational
20 records. Excuse me. I don't want to leave anything out.

21 (Pause.)

22 A Records from the various homes that he was in, group
23 homes, and I think I may of mentioned mental health records,
24 psychiatric records from hospitals and treatment facilities,
25 out-patient treatment facilities. And I reviewed records of

1 his grandmother's hospitalization. And those are the
2 primary records that I reviewed.

3 Q Okay. And did you, did you interview a number of
4 people in connection with this case?

5 A Yes, sir, I did.

6 Q And those people include, you don't have to list
7 everybody necessarily, but the primary people?

8 A I reviewed his cousin, Jaharra Torres, his father's
9 mother, Andy Torres, his mom, Lisa, aunts, uncles, his
10 grandmother, Glenda, and his cousins, Jessica and Amanda, in
11 terms of family members. And then I interviewed some
12 collateral witnesses. That is non-related people who I felt
13 could help me. And that, that included Nakita Harrison, one
14 of his former case managers, Jonathan Howard, a friend of
15 his, John Shackelford, who is the former case manager.
16 Those are primarily the people who I interviewed.

17 Q Okay. Now -- and I believe one of the charts you said
18 that you created for this case was a genogram?

19 A Yes, sir.

20 Q What is a genogram?

21 A A genogram is like a big family tree. It's meant to
22 show important individual family members in the person's
23 life, and then it's, it's meant to show the kinds of
24 problems that those people had because sometimes we find
25 that the people we interview share similar problems as other

1 members of their family or affected by problems of members
2 of their family. And yes, sir, that's a part of what a
3 genogram does. It shows sometimes the relationships between
4 people in the families, for example, when there's abuse.
5 There's a line that shows that.

6 Q Okay. And what is the methodology if -- I mean I don't
7 want you to go through everything you've reviewed.

8 But what is, in general, is the methodology for
9 creating the genogram?

10 A To make a genogram, in general, you review all the
11 documents that you can have to show the history you know,
12 and when there's a family member whose documents you should
13 review, you try to do that. If not, perhaps talk with
14 someone who is involved with them at the time. For a
15 genogram, you interview family members, collateral
16 witnesses, and the individual himself or herself to try to
17 come up with an accurate kind of photo, a snapshot of their
18 lives, the problems with people in their lives, and the
19 relationships they had with those people.

20 Q Do you, do you rely on any one source for any amount of
21 information that's located on the genogram?

22 A No, sir, you try to have more than one source.

23 Q And why does the methodology require more than one
24 source?

25 A Well, whenever possible, if you can hear from family

1 members and like a doctor as a collateral witness and see
2 records, just all that you can bring to bare help with the,
3 the information that you're trying to put together on the
4 chart.

5 Q Okay. Now, so, you followed that methodology in this
6 case?

7 A Yes, sir.

8 Q Okay. And I am gonna first show you, show you
9 Defendant's Exhibit 2 -- thank you.

10 Defendant's Exhibit 2, this is the -- is this the
11 genogram that you prepared in connection with this case?

12 A Yes, sir.

13 Q Using the methodology that you've previously outlined?

14 A Yes, sir.

15 MR. ALLEN: At this time, Your Honor, we offer into
16 evidence Defense Exhibit 2.

17 THE COURT: Subject to previous objections?

18 SOLICITOR CRICK: Yes, sir.

19 THE COURT: It will be admitted then.

20 MR. ALLEN: Thank you.

21 (Whereupon, Defendant's Exhibit No. 2 was received into
22 evidence at this time.)

23 MR. ALLEN: And permission to publish to the jury?

24 THE COURT: You may do so.

25 Q Doctor Loring, if -- could you step down here and I

1 want to try to set up an easel.

2 (Witness comes down from the stand.)

3 Q If you would, please explain this genogram, if you
4 would.

5 WITNESS: Please excuse my back, Your Honor.

6 THE COURT: That's fine. Go right ahead.

7 Q If you would, explain this genogram please.

8 A I'm wondering if you, you-all can see this properly.

9 (Jurors nod affirmatively.)

10 A Okay. Where there's a small box, it's meant to be a, a
11 man, and where there's a circle, it's meant to be a woman.
12 Sometimes you'll see that kind of a box over the circle, and
13 that's meant to show you what I'm gonna explain, something
14 about that person.

15 So, you have these symbols and these lines are meant to
16 show the relationship between people, which I'll show you
17 also. And then these lines are meant to show you a problem
18 in the relationship, which I'll explain to you.

19 Now, in this key, and I'll certainly go back to it, but
20 it explains that wherever you see yellow, you see an
21 alcoholic problem. So, for example, there you see an
22 alcoholic problem.

23 Where you see pink outlined like that, you'll see a
24 panic disorder.

25 Where you see green, you'll see mental illness.

1 Primarily depression in this family.

2 Blue, there would be a blue outline or right here, that
3 would be bipolar disorder.

4 Red indicates violence.

5 And that little plus like that, that indicates a drug
6 problem or drug addiction.

7 And where you see the little bit of square left white,
8 that means there's also a history of, a criminal history.

9 So, if -- and I apologize. That should be Continuum of
10 Care right here. Excuse me.

11 So, we'll start off, this is Tony Torres and you, you
12 see immediately the yellow indicating the alcoholic problem.
13 You see the plus indicating a drug problem. See the red
14 indicating a history of violence. 1980, his birthdate. You
15 see the white there indicating a criminal history. And you
16 see the blue outlined indicating bipolar disorder.

17 Now, Tony's dad, biological dad, is Andy, and his
18 biological mom is Lisa. So, you have Lisa and Andy, and
19 then they're together, and then down here comes Tony.

20 Andy, his biological father, you see the yellow
21 indicating the alcohol problem, and this box around him
22 really isn't meant to indicate anything. It just hacked --
23 the program put it there to indicate, to hold the yellow.
24 So, then you have the red indicating violence, and you have
25 the plus indicating drug struggles, drug issues.

1 Some of the violence was toward Tony. So, that's where
2 that squiggly line is, physical abuse. We'll talk more
3 about that on the time line.

4 And then for Andy, there's also physical abuse toward
5 Lisa, Tony's mom, both prior to his birth -- primarily prior
6 to his birth. But some afterwards.

7 Now, this dotted red line with the separation indicates
8 abandonment. So, after the separation between the two of
9 them, Andy and Lisa, for all purposes, Andy abandoned Tony.
10 There were, you know, several visits and that was the end of
11 it.

12 Also, abandoning Tony, since we're on the subject of
13 abandonment, if we go up like this, we have his grandfather,
14 Frank. That would be Lisa's father. So, Grandpa Frank just
15 didn't care for Tony because of Tony's Hispanic origin with
16 Andy. So, he abandoned him for all intensive purposes,
17 Grandpa Frank, which is Lisa's dad.

18 And I know we have the line of abandonment going up to
19 his mom, Lisa, who was overwhelmed with the person she later
20 married, which is Eddie. She later married Eddie after she
21 separated from Andy. Eddie was an alcoholic.

22 So, Lisa was trying to cope with an alcoholic husband,
23 and she was trying to cope with a mentally ill mother,
24 Grandma Glenda, was hospitalized on, with a mental illness,
25 had electroshock treatments for some of the depression. So,

1 because Lisa was struggling with her mentally ill
2 grandmother, and with an alcoholic husband, and a full-time
3 job, and her own struggles with Tony, it got to the point
4 where she just didn't have him home and didn't participate
5 in the family therapy sessions she was asked to as one would
6 of hoped.

7 And then Lisa's brother, who is F.B., was very close to
8 Tony up until Tony was about five, and then he developed a
9 family of his own and got, had a job out of town that he
10 went to, and he just didn't have much more to do with Tony
11 at that point. So, you can see that Tony experienced
12 abandonment with his mom, his dad, his particularly close
13 Uncle F.B., and his Grandpa Frank.

14 I didn't get a lot of history on his father's Andy side
15 of the family because of the rejection of Andy toward Tony
16 and Andy really didn't want to participate in this. I did
17 catch him long enough to have, have a brief talk. But I, I
18 asked for, but was not granted the opportunity to get as
19 much history as I would of liked to have or I am aware, from
20 family reports, in that Andy agreed that his brother, Tito,
21 was, you see the green, the mental illness, primarily
22 depression here, he was depressed and he hung himself, and
23 it was successful. He died.

24 Now -- so, I tried to include what I knew of them. But
25 I'm sorry. I couldn't get more.

1 Now, going, going over this, we have, we have
2 Grandfather Frank and we have Grandma Glenda. And again, as
3 I said, Grandma Glenda did receive psychiatric treatment for
4 her mental illness. It was thought to be schizophrenic and
5 other thought it as depression. And her -- Glenda's
6 brother, grandma, Glenda's brother, which will be like
7 Tony's great uncle I think, was said by family members,
8 several family members, to have been diagnosed with bipolar
9 disorder as well. And you can see you -- you begin to see
10 the different blue boxes. We do often find that bipolar
11 runs in families as it is inherited is the thought.

12 Now, we have Lisa, Tony's mom, Lisa, her sisters, and
13 we have in pink, which is struggling with panic disorders,
14 Tony's Aunt Donna, Aunt Tammy, and Aunt Paula. And then we
15 have Aunt Pam outlined in green because of her depression.
16 And coming down this way, we have Aunt Pam's daughter,
17 Amanda, and Aunt Tammy's daughter, Jessica, and Doctor
18 McAlhaney indicated both have very, when I talked with them,
19 very high anxiety, and then there's thought to be bipolar,
20 but anxiety was so large that's a primary diagnosis,
21 according to the doctor, Jessica's primary diagnosis is
22 bipolar.

23 Again, this is to be Continuum of Care. It should say
24 Continuum of Care. And this is the agency that connected
25 with Tony when he was a couple of years old and stayed with

1 him really through around 17 years old. So, I put that on
2 the family chart because I talked to three people who were
3 involved in that organization who were case managers and
4 worked with Tony and it was, it was a very big influence in
5 his life.

6 And going right down, that box is psychiatric treatment
7 and Community of Care would help arrange the psychiatric
8 treatment. And the psychiatric diagnoses were suppose to
9 get back to the Continuum of Care workers so that the
10 Continuum of Care case managers could properly treat and
11 help Tony.

12 Unfortunately, the two things that happened, as you can
13 see by the question mark on the chart, is, the first thing,
14 the psychiatric diagnoses kept changing. You'd go to one
15 place and you have one diagnosis. You'll see more of that
16 on the time line. He'd go to another place and have another
17 diagnosis. And they kept changing, which made a difference,
18 and you'll see in a few moments how that would of made a
19 difference.

20 And the other thing that was quite unfortunate is at
21 least two of the three community care workers, that is the
22 people who were at the group homes, two of the three weren't
23 aware of the psychiatric diagnosis at the time that they
24 were helping Tony, which would of made it quite difficult
25 for them to sort of adjust what they were doing to the

1 person they were helping because you're really suppose to
2 help people differently according to what's wrong with them,
3 and you'll see that in a few moments.

4 So, that's what we call a genogram, which is sort of a
5 mental health family tree if you will. And, and where you
6 see an X, like over here, the person has passed away. And,
7 and there you have it.

8 Thank you.

9 (Witness returns to the stand.)

10 Q Did you also create a, a time line in connection with
11 this case?

12 A Yes, sir, I did.

13 Q Okay. And I'm showing you Defense Exhibit 3, and can
14 you tell me what this is?

15 A That is the time line of, for the life of Tony Torres.

16 Q Okay. And what methodology do you use in creating a, a
17 time line?

18 A I review extensive records. There's a large, a large
19 number of records in this case. I also interview family
20 members and collateral resources in order to put together an
21 accurate time line.

22 Q Is this similar to the methodology that's used in
23 creating a genogram?

24 A Yes, sir, it is.

25 Q And again, do you use it, like I say, this one source

1 for any particular entry or---

2 A Well, sir -- no, sir, not -- usually at, in this case,
3 I had more than one source for the entries. I'm not certain
4 if there was one entry that could of had just one source,
5 one -- but for the most part, there were many records and
6 many people to interview in this case. For, for the most
7 part, I had more than one source.

8 Q Is this methodology typically used in creating time
9 lines in this area of doing psychosocial assessments, family
10 and life histories?

11 A Yes, sir.

12 Q Okay. And that's the, and that's the methodology you
13 followed in creating Defense Exhibit 3, the time line in
14 this case?

15 A Yes, sir.

16 MR. ALLEN: Okay. And we offer this into evidence as
17 Defense Exhibit 3.

18 THE COURT: Without objection?

19 SOLICITOR CRICK: Yes, sir.

20 THE COURT: All right. It will be admitted.

21 (Whereupon, Defendant's Exhibit No. 3 was received into
22 evidence at this time.)

23 MR. ALLEN: And permission to publish to the jury?

24 THE COURT: You may do so.

25 Q Okay. Doctor Loring, if you would, step over here. If

1 I set this up there for you.

2 Can you---

3 A Sir, may I bring this as well?

4 Q Okay. Well, let's get this into evidence first then.

5 A Thank you.

6 Q I'm gonna show you Defense Exhibit 4.

7 Can you tell me what this is?

8 A Yes, sir, that is a listing of the various living
9 situations in the life of Tony Torres, group homes,
10 psychiatric hospitals.

11 Q And you created this listing from what?

12 A From the documents and from the interviews and
13 collateral witnesses.

14 MR. ALLEN: Okay. We offer Defense Exhibit 4 into
15 evidence at this time.

16 THE COURT: Any objection?

17 SOLICITOR CRICK: No, sir.

18 THE COURT: Without objection, it's admitted.

19 (Whereupon, Defendant's Exhibit No. 4 was received into
20 evidence at this time.)

21 MR. ALLEN: Permission to publish to the jury?

22 THE COURT: You may do so.

23 Q Doctor Loring, if you would come down and---

24 A Make I take these with me?

25 Q Okay. We're going to have to -- before you, before you

1 show these photos to the jury, they're gonna have to be
2 admitted into evidence. So, I want to ask you to explain
3 the time line and the placements. And if you get to a point
4 where you want to use the picture, then let me know and pick
5 up the picture, without showing it to the jury, and we'll
6 get it into evidence, we'll offer it into evidence at that
7 time.

8 A I see.

9 Q Okay.

10 A I understand.

11 Q Okay. If we can just -- okay.

12 A Oh, what has happened is because I don't have these --
13 let me think.

14 Your Honor, I, I need to be able to perhaps put these
15 down to be able to see which pictures are here in order to
16 indicate when I might need to---

17 THE COURT: Is there a surface inside the witness
18 stand?

19 MR. ALLEN: There is not. But we can make one with the
20 chair.

21 THE COURT: All right. That will be fine.

22 MR. ALLEN: We can put the chair up like that.

23 WITNESS: Thank you, Your Honor.

24 Thank you, sir.

25 Q Okay.

1 A Thank you.

2 Q Now, this is the time line that I created to help
3 summarize the important things in the life of Tony Torres.
4 Certainly it isn't every single thing. But hopefully it's
5 the important things. And as I said, I got it from records
6 and from family and from collateral witnesses.

7 I have a picture for number one, sir.

8 Q Okay. I'll just stand right over here then.

9 And is this the picture, this is Defense Exhibit 5, is
10 this the picture?

11 A If I, if I can look at the yellow -- yes, sir.

12 Q Okay. And this picture depicts what part of Tony?

13 A Shortly after birth.

14 MR. ALLEN: Okay. We offer Defense Exhibit 5 into
15 evidence at this time.

16 THE COURT: Any objection?

17 SOLICITOR CRICK: No, sir.

18 THE COURT: Without objection, it will be admitted.

19 (Whereupon, Defendant's Exhibit No. 5 was received into
20 evidence at this time.)

21 A No, sir.

22 MR. ALLEN: Okay. And may we publish to the jury?

23 THE COURT: You may.

24 A This is a picture of -- Tony was born 7/30/80 after his
25 father beat his stomach and he beat Lisa around the stomach

1 and back while pregnant. Unfortunately we find sometimes
2 with batters and pregnant women. And Lisa had experienced
3 abuse from her father, abuse from her husband, her partner,
4 Andy, and saw this as a child who was gonna be her companion
5 for life. That's how she talked about Tony. She was very
6 excited about having him.

7 Q Okay.

8 A Thank you.

9 The second indicates Tony about eight months old and I
10 have a picture for this. Actually, the next two pictures,
11 if you'd be so kind.

12 Q Showing you Defense Exhibits 6 and 8.

13 A Yes, sir.

14 Q And these pictures, is that which you refer?

15 A Yes, sir.

16 Q And Defense Exhibit 6 shows him at what stage?

17 A Very young. About eight months old.

18 Q And---

19 A No, I beg your pardon. Very young, very young. It was
20 prior to eight months. He was an infant. After birth.

21 Q And Defendant's Exhibit 8.

22 A Similarly.

23 MR. ALLEN: Okay. Offer these---

24 WITNESS: Okay.

25 MR. ALLEN: Offer these into evidence at this time.

1 THE COURT: Any objection?

2 SOLICITOR CRICK: No, sir.

3 THE COURT: They'll be admitted.

4 (Whereupon, State's Exhibit Nos. 6 and 8 were received
5 into evidence at this time.)

6 THE COURT: You may publish.

7 A Thank you.

8 Here we have a picture in both -- he's a very young
9 infant like here just beyond is he really -- and you see a
10 picture of him being held with his mother, by his mother and
11 father. And this attachment to his father and then the
12 rejection by his father will be a theme in his life that
13 will later be mentioned in various psychiatric records of
14 him talking longingly about his father and wishing that his
15 father cared about him in ways that made Tony feel like his
16 father would reach out to him or reach back to him.

17 Thank you.

18 Number 2 is '81, about eight months old, and I do have
19 a picture of that, for that as well.

20 No, sir.

21 Q Okay. If you---

22 A Could you hand them to me in order?

23 Q Okay. If you can do that without showing it to the
24 jury.

25 A Certainly.

1 You know what I'm going to do?

2 I'm going to continue onwards.

3 Q Okay.

4 A Okay.

5 Q Thank you.

6 A Certainly.

7 And I'm, I'm going to ask -- there, there needs to be
8 some way that I can be accurate and hold them like this if
9 that's all right so I can---

10 THE COURT: Ma'am, as long as they don't -- they're,
11 they're not in evidence and they can't be shown to the jury
12 until they are.

13 WITNESS: Thank you, Your Honor.

14 THE COURT: Now, you can -- I can't, I can't control
15 how you present them.

16 WITNESS: Thank you, Your Honor.

17 THE COURT: Thank you, ma'am.

18 WITNESS: Thank you, Your Honor.

19 THE COURT: Yes, ma'am.

20 A Thank you so much.

21 Q Okay. All right.

22 A Thank you.

23 Q Please continue.

24 A Certainly.

25 Already in 1981, when he was about eight months old,

1 there began to be observations that he seemed a little too
2 nervous, a little too -- some people thought it as
3 aggressive. He would hold on to his crib, the kind of crib
4 that you lie in, and that you have the sides that are square
5 with the little slats, little wooden slats. He would be
6 shaking his crib so hard that some of the slats, the little
7 wooden pieces that ran up and down, would fall out of the
8 crib.

9 He began to be noticed rocking. Couldn't go to sleep
10 unless he was rocked. He began to be noticed hitting his
11 head against the crib or the wall.

12 In 1981, he was about a year old. We, you know, he
13 still was again the apple of his mom's eye. She loved him
14 very much and spent all the time she could with him.

15 And number four, again, all this in 1981, he's about 15
16 months old. And just so you know what's happening, I'm not
17 using all the pictures. So, I'm just trying to beware of
18 the pictures I'm using, and I think in this instance we'll
19 just keep right on going, and rather than use a picture I'll
20 talk to you about the fact that he had a little duck that he
21 always held.

22 His mother and father separated, and that whole process
23 was very violent and very very dangerous. At one point,
24 father, Andy, held little Tony, who's about 15 months old,
25 out of a window and dangled him. The police were called

1 because, of course, there's a fear that he'd been dropped
2 from the window. This was like on the second floor I
3 believe. And then another thing that happened during that
4 same incident is, as a 15 month old, Andy was squeezed by
5 the father when some people noted that he couldn't breathe,
6 he couldn't catch his breathe because of the violence with
7 which he was squeezed after he was dangled out of the
8 window.

9 The police were called and talked to, to Andy and were
10 able to talk him into turning Tony over to Lisa who then
11 left immediately and came back at some point for her
12 clothes. And that was the separation.

13 Now, during this period of time, 14 to 15 months old,
14 and just prior to that, Andy, the father, would put Tony on
15 the floor and Andy would, according to grandma, bring up his
16 foot and crash it down to the side, right to the side of
17 Tony's head like protending he was gonna stomp him, and then
18 he'd bring his foot up and bring it down real hard on the
19 other side of Tony's head. And there were occasions,
20 Grandma Glenda said, where he actually brought it down on to
21 Tony's face. She said there weren't two many and she tried
22 to take Tony away right away when that happened.

23 We go on to number five and we have 1982 when he's
24 about 18 months old, and the family describes the
25 indescribable. They come up with words like fits or spells

1 to try to describe what they're saying in terms of outbursts
2 that Tony will have. Sometimes it's when he doesn't have
3 his way. Sometimes it doesn't seem to have to do with
4 having his way or not. Sometimes he's sitting off prior to
5 this, and during the 15 month period, he's sitting off on
6 the couch rocking and crying for no known reason. At least,
7 none that the mother, Lisa, could, could come up with.
8 Again, he's banging his head and rocking himself to sleep
9 prior to and at this time, and he's getting out of doors
10 that are locked and going out into the road.

11 So now I'm gonna catch a couple of pictures here.

12 Q Okay. Now -- okay. Show, showing you exhibit, Defense
13 Exhibits 11 and 12, what do they -- generally, do you know
14 what these are?

15 A Yes, sir.

16 Q And what part of the time line does that refer to at
17 this point?

18 A The two that are the front refer to 1982. This is
19 going to be later. So, I'm going to wait on it.

20 Q Okay.

21 A Thank you.

22 These are 1982, about 18 months old, sir.

23 Q What do they depict?

24 A They depict the length---

25 Q In general.

1 A Oh.

2 Q In general.

3 A Doors with locks on them.

4 MR. ALLEN: Okay. We offer these into evidence as
5 Defense Exhibits 11 and 12.

6 THE COURT: Any objection?

7 SOLICITOR CRICK: No, sir.

8 THE COURT: Without objection, they're admitted and may
9 be published.

10 MR. ALLEN: Thank you.

11 (Whereupon, Defendant's Exhibits Nos. 11 and 12 were
12 received into evidence at this time.)

13 Q You may show them to the jury.

14 A Thank you. Thank you so much.

15 So, when Tony -- in 1981, when Tony was 18, 18 months
16 old having his outbursts or spells, the family was very
17 concerned that he'd run out the door, and they had to put
18 locks at the very top of the doors. I thought it was
19 interesting in order to keep him safe so he wouldn't run out
20 into the road, into the street because part of him having
21 these outbursts is he didn't seem able to control himself.
22 He seemed to flail about with his arms and legs and his
23 hands and run about as well.

24 So, they put these locks at the very top of the doors
25 to make certain he stayed inside and be safe. Thank you.

1 Have -- I have a picture for this.

2 1984, four years old, sitting on the, a bench.

3 Q And I'm showing you Defense Exhibit 13, and is that the
4 one that correlates with the one sitting on the bench?

5 A Yes, sir.

6 Q And this is correlating to what part of the time line?

7 A It's 1984, number six.

8 Q Which is what?

9 A His first hospitalization.

10 MR. ALLEN: Okay. We offer this into evidence as
11 Defense -- this is Defense Exhibit 13. We offer into
12 evidence as Defense Exhibit 13.

13 THE COURT: Any objection?

14 SOLICITOR CRICK: No, sir.

15 THE COURT: Without objection, it's admitted and it may
16 be published.

17 MR. ALLEN: Thank you, Your Honor.

18 WITNESS: Thank you, sir.

19 (Whereupon, State's Exhibit No. 13 was received into
20 evidence at this time.)

21 Q When Tony was four years old in 1984, the outbursts
22 were such that his mom wanted to find out, you know, what is
23 going on here. She also had difficulties coping with him,
24 and had a lot of worries thinking that they should of gone
25 away by now if they were normally, you know, childhood kind

1 of outbursts.

2 So, she took him for help. Went to SMUC at Charleston
3 where they admitted him. And this is the picture of Tony
4 taken at the hospital sitting on a bench and a little kind
5 of mattress was put under his feet that didn't quite reach
6 the floor. And he's gonna be admitted there for the first
7 of many psychiatric hospital admissions in his life, and
8 then the first of many admissions into group homes with the
9 help of the Continuum of Care.

10 And I think, you know, the reason that I picked this is
11 because, you know, to show his size and age during his first
12 admission to the psychiatric hospital.

13 It was also around this age, just, my understanding is
14 just prior to his hospitalization, when he helped pick out a
15 birthday present for his father, Andy. At that time, he was
16 still getting a visit once in a while to get to go see his
17 father, and he picked out a shirt which was apparently a
18 very very colorful pretty shirt, and took it on the visit
19 and it was, it was reported to me that his stepmother, the
20 woman who his dad, Andy, was with at that time, took the
21 shirt and burned it in Tony's presence.

22 So, he came home crying that the gift to his dad, the
23 birthday gift had been burned. Indications were that she
24 didn't care for him, didn't really want him with his dad.

25 Going on to number seven, we have Tony at five years

1 old when he graduates from kindergarten, and there's a
2 picture of that as well.

3 Q Showing you Defense Exhibit 14.

4 Is that the picture depicted of the kindergarten?

5 A Yes, sir.

6 MR. ALLEN: Okay. Offer this into evidence as Defense
7 Exhibit 14.

8 THE COURT: Any objection?

9 SOLICITOR CRICK: No, sir.

10 THE COURT: Without objection, it will be admitted as
11 marked.

12 (Whereupon, Defendant's Exhibit No. 14 was received
13 into evidence at this time.)

14 THE COURT: It may be published.

15 A And I'll just make sure that no one -- thank you.

16 Am I allowed to show this one?

17 Q Yes, you may.

18 A Then we have Tony who graduates from kindergarten, and
19 by this time starting about age four, he's either in the
20 psychiatric hospital getting treatment or in a group home as
21 was suggested earlier. There are occasional visits home
22 like weekends because the group homes that he is in, like in
23 this case, you know, getting his graduating from
24 kindergarten, earns him a certain number of points. And
25 when he gets these points, then he is rising to different

1 levels. It's, it's a behavioral management system used for
2 kids that have different kind of behavior disorders.

3 The idea is you reward them, give them points, they
4 rise up a level, they get to go home at a certain level, and
5 then that motivates them to keep doing well. So, it's a
6 reward system. And so, he earned his graduation from
7 kindergarten and earned a trip home.

8 The only problem was, for Tony, that this point system
9 didn't work so good a lot of time with him. Sometimes he
10 was able to control his behavior and sometimes he was not.
11 So, he'd get all excited, he'd done well, he earned the
12 points at the group home, he would go home, and then he
13 reports trying very hard, getting these headaches, having
14 these outbursts, sometimes hitting someone, sometimes just
15 flailing about, and that there were times when his mother
16 just said, you know, that's enough, I can't handle this. I,
17 you know, I have a mama I'm taking care of. I grew up
18 taking care of all my siblings because she was mentally ill
19 then with due respect to her. I have an alcoholic husband.
20 I have a full-time job. I can not cope with your behavior
21 this way.

22 So, he would, by his report, by the report of case
23 managers, make an effort not to behave that way and yet have
24 an outburst at home after which his mother would sometimes
25 return him early because she couldn't tolerate that, which

1 was a source of great frustration for him because it got to
2 be where his mother really didn't always want him home.

3 And this is when his Uncle F.B. is now leaving the
4 closeness with him, abandoning him for the job and a new
5 family, and then Tony is living in a group home. And as an
6 adult, he looks back upon this to this day, shakes his head,
7 and doesn't really understand why he couldn't get a grip and
8 control himself all the time. Not just some of the time.
9 Because some of this behavior caused him to lose being at
10 home with his mom. And there were times when his father
11 would bring him back from a visit too for the same reason
12 cause he had been banging his head against a wall.

13 The cousin reports that when he was with his father
14 during these early years, during one of his rare visits,
15 that Tony beat his head against a brick wall to the extent
16 that he was bleeding and his father then brought him back
17 home.

18 It was during these early years, starting with three
19 going onto five and beyond, that his father would blow
20 marijuana into his face and give him beer to drink as well.

21 Number eight is 1986. Here Tony's six years old. Of
22 course, in a group home. And then he talks about, to the
23 case managers in the psychiatric records and later to me,
24 the, the grieving he felt for being with his dad, for not
25 being with his mom. How rejected he felt and he began to

1 turn to food and gained a great deal of weight.

2 In 1988 was a very different year in the life of Tony
3 Torres. In 1988 -- can you see this okay?

4 (Jurors nod affirmatively.)

5 A In 1988, Doctor Caston diagnosed Tony Torres as being
6 bipolar. Before this time the doctors thought maybe he had
7 an explosive, intermittent explosive disorder or a conduct
8 disorder trying to account for these outbursts. Some
9 doctors said I think he has a neurological problem. Some
10 said I think he has a seizure disorder. They give him
11 medication to try to help with a seizure disorder.

12 And all of the disorders that he had up to this point
13 had the assumption you can control your behavior. Conduct
14 disorder, intermittent explosive disorder, you know, you
15 give the kids rewards. You, you take away privileges. They
16 talked to mother, Lisa, take away privileges if he doesn't
17 do things right. And that's what the standard was at that
18 time.

19 But what no one knew before 1988 was if indeed he was
20 bipolar, then what he was being expected to do he could do
21 some of the time. But some of the time people who are
22 bipolar, especially kids, but adults as well, there's no way
23 they can control it. It's, it's known to be a chemical
24 issue. That's why they give them high dosages of lithium.

25 So, Doctor Caston did a blood test, and decided that

1 indeed Tony was bipolar, gave him high dosages of lithium as
2 well as Melloral and for that year, not to say he was
3 entirely well, but being certainly changed.

4 And I have an envelope that I would like to---

5 Q Okay.

6 SOLICITOR CRICK: And Your Honor, if I could, just
7 while we're pausing here, I'm trying to be patient. I think
8 what we've got going on right now is a narrative, and I
9 would ask that at least she be asked some questions.

10 THE COURT: I'll sustain the objection.

11 Q Okay. Doctor Loring, we won't go into the envelope.

12 If you would please, can you tell us what else the time
13 line depicts in a summary fashion?

14 A Yes, sir, I'll do that.

15 Summarizing, in, in 1988, he began to have
16 accomplishments, ribbons for sports events, excellent report
17 cards, and the like. He began, in '88, to function much
18 better. In -- should I go ahead?

19 Q Yes.

20 Now, is that -- are you finished with that particular
21 portion of the time line?

22 A With 1988. Yes, sir, I'm ready to go on to number ten.

23 Q Please, if you would, tell us about the next portion of
24 the time line.

25 A Yes, sir, that would be number ten, which is 1989 to

1 1990, when the police are called because, at that point, the
2 diagnosis changed again away from bipolar to a different
3 diagnosis so the medicine would change and Tony has another
4 outburst or crisis as to some of the group home people call
5 it and took a brick to his mom's car, number one.

6 Number two, saw pictures of his mother with bruises on
7 her legs and arms. Asked if a boyfriend did that to her.
8 was told by his mother no, you did, and was astonished that
9 he would have grabbed or pushed his mother to create bruises
10 on her, and there was a growing recognition then, by mental
11 health people in the family, that he didn't remember his
12 behavior during these outburst afterward. He had to be told
13 what he had done.

14 Q Okay. Can you -- are you finished with that portion of
15 the time line?

16 A Yes, sir.

17 Q Can you go -- can you tell us what's the significance
18 about the next portion of the---

19 A Yes, sir.

20 Q ---time line?

21 A Yes, sir. That would be number 11, 1991 to 1994, in
22 which the mother kept canceling her home visits. That is
23 Tony's coming home. He was 12, 13, 14 and he'd call home.
24 She, at one point, said what she was cooking for
25 Thanksgiving dinner, but then didn't allow him to come home.

1 she was depressed herself, very anxious herself, and was not
2 able to come to family therapy to speak of canceling out.

3 Q So, can you tell us what is significant about the next
4 entry on the time line?

5 A Number 12, the diagnosis just kept on coming in terms
6 of it being different, they're, they're being different
7 during his 14, 15, 16, 17, and he's again living in
8 different places continually, in and out of psychiatric
9 hospitals, very depressed, and that's when the trouble is
10 coming.

11 Q Okay. And the next entry on the guide, time line, can
12 you tell us what's significant about that?

13 A I will accept this chart will come in right here if I
14 may?

15 Q And you want to -- okay. This is been -- you're
16 talking about Defense Exhibit 4. You can publish to the
17 jury at this time.

18 A Thank you. Thank you so much. I have to say thank
19 you. Appreciate it.

20 This -- I put this together and I listed out the
21 different psychiatric hospitals and group homes that he
22 lived in from age four through age seventeen because it
23 seemed like so many that I needed to see it myself. It's,
24 it's the Medical University in Charleston at four and seven,
25 Charles Lea Center at six years old, the inpatient

1 Spartanburg Regional Psychiatric Hospital at seven years
2 old, York Place, a group home, at eight and, and nine,
3 Spartanburg Regional Hospital at eight, Patrick Harris
4 Hospital at 11, Pioneer Ridge where we lived at 11, Hall
5 Institute where he's treated at 11, Carolina Children's Home
6 where he lived at 12, Spartanburg Boys Home where he lived
7 at 13, Pine Ridge where he lived as well about 13, Boys Home
8 of the South where he lived at about 14, Michael's Run,
9 about 17, and two others around that time, Lancaster
10 Children's Home and John Crane house.

11 So, I finished with 12.

12 Q What is the significance of the next entry of the, of
13 the diagram?

14 He was released from the, photograph when he's released
15 from the Lancaster Home.

16 A Yes, sir.

17 Q Okay. And what is significant about that entry of the
18 time line?

19 A He was released from the Lancaster Home at 17. The,
20 the case manager did not know that he was or had ever been
21 diagnosed as bipolar. Had she known that, he might of been
22 able to have stayed longer.

23 And when I say homeless, he went from family member to
24 family member. He was depressed. There were no follow-up
25 visits. Continuum of Care doesn't have funds to do

1 follow-up visits. He became more and more depressed, and
2 began doing self-medicating, which is what we call it when
3 people take drugs when they're not in a psychiatric
4 hospitals in order to try to deal with their depression or
5 other kinds of anxiety or problems that they have.

6 I finished with 13.

7 Q And what is significant about the next entry which
8 you've titled prison probation, work release?

9 A During these years, 2002 through 2006, there is a
10 combination of him having experiences in prison, on
11 probation, and being on work release. He's still
12 self-medicating.

13 Q And what about the significance of the things, the last
14 entry, the depression and self-medication?

15 A Yes, sir, number 15, December '06 to May '07, he
16 continued to become more depressed and continued basically
17 to self-medicate.

18 Q Okay. Thank you.

19 A My pleasure.

20 Q Let me take these charts down.

21 In creating the life history and your study of, of his
22 life, did, were there any themes that were developed or did
23 you come to any conclusion as to any themes that were
24 prevalent in his life?

25 A Yes, sir.

1 Q And what were those?

2 A That Tony Torres suffered from low self-esteem, from
3 mistakes that he made in his own behavior, and often later
4 didn't remember---

5 SOLICITOR CRICK: Your Honor, I'm gonna object at this
6 time. These are conclusions and they're speculative. I
7 don't know how she would know that.

8 THE COURT: Mr. Allen.

9 MR. ALLEN: Your Honor, she's been qualified as an
10 expert in the life history and development of themes. And
11 as I understand it, I mean I can ask more questions about
12 the life.

13 THE COURT: Well, is she stating her opinion at this
14 point in time?

15 MR. ALLEN: She's -- yes, Your Honor.

16 SOLICITOR CRICK: It was my understanding, Your Honor,
17 she's not an expert in themes. She can report a history
18 that she reads from documents and gets from other family
19 members. But I didn't hear anything about being able to
20 diagnose themes or describe how he was feeling at the time.
21 I don't recall that.

22 MR. ALLEN: Okay.

23 THE COURT: I'm going to sustain the objection at this
24 time. You're gonna have to lay, lay a, a better foundation.

25 MR. ALLEN: One second please, Your Honor.

1 THE COURT: Yes, sir.

2 (Pause.)

3 Q Thank you, Doctor Loring. If you'd answer any
4 questions of the State.

5 THE COURT: Mrs. Crick, are you gonna do the
6 cross-examination?

7 SOLICITOR CRICK: Yes, sir.

8 THE COURT: You may proceed.

9 SOLICITOR CRICK: Thank you, Your Honor.
10 I'm gonna try to be as brief as I can.

11 THE COURT: That's all right.

12 CROSS-EXAMINATION

13 BY SOLICITOR CRICK:

14 Q You were hired by the defendant and compensated by the
15 defense in this case, is that accurate?

16 A The center with which I work was, yes, ma'am.

17 Q But you're the director and founder of the center?

18 A That is correct too.

19 Q So, you're being, being paid to do this?

20 A No, I'm not being paid directly, no, ma'am.

21 Q To your center?

22 A Yes, ma'am.

23 Q You are technically -- you're not a psychiatrist, are
24 you?

25 A That is correct.

1 Q You're a social worker?

2 A I'm, I'm here as a clinical sociologist.

3 Q So, you're a licensed social worker as well?

4 A Yes, ma'am, but that's not the capacity in which I come
5 here today. I come here today as a clinical sociologist.

6 Q Are you licensed in South Carolina?

7 A As a clinical sociologist, we don't have licenses. We
8 just have degrees.

9 Q How about as a social worker?

10 A I'm not licensed, but I'm not here today as a clinical
11 social worker, ma'am.

12 Q You have worked with defense attorneys before in this
13 capacity to come up with your presentations, is that
14 correct?

15 A I'm so sorry.

16 would you repeat that?

17 Q You have worked with defense teams, with defense
18 attorneys in the past to come up with presentations like
19 this on social assessments, is that correct?

20 A I usually don't work with attorneys to come up with the
21 presentation. But I certainly have done social histories
22 before in South Carolina and elsewhere in that regard, yes,
23 ma'am.

24 Q And you present them for the defense in trials like
25 this one, is that correct?

1 A I do present them in, in trials like this, yes, ma'am.
2 I never consider myself doing it for the defense or for the
3 prosecution because sometimes if they don't like what I'm
4 going to say they ask me just not to come and talk.

5 Q Oh, okay. So, they kind of approve it first?

6 A No, ma'am, they -- if I'm telling the truth of what I
7 have found, if they don't like it, then they can just send
8 me away.

9 Q Okay.

10 A So, they can't approve it and they can't -- I don't do
11 it for them so to speak.

12 Q You were told about the crime in this case and the
13 events that happened on May 11th?

14 A In -- perhaps in brief fashion. That wasn't my area to
15 study. So, I did not go into any depth in that.

16 Q But you looked at reports I think you said from the---

17 A No, ma'am, I looked at police reports leading up to
18 that time.

19 Q Okay. But not surrounding this time.

20 So, no one told you about the threats by the defendant
21 to kill the Emory's?

22 A No, ma'am, that was not my area.

23 Q Did they tell you about the sexual assault?

24 A I did not study that. That was not my area either.

25 Q When did you actually join the defense team or speak

1 with someone from the defense team about coming to court?

2 A Approximately three months ago. And you're right, I
3 honestly don't consider myself part of a team. But yes,
4 ma'am, approximately three months ago.

5 Q And you have met with the defendant in this case?

6 A Yes, ma'am, I have.

7 Q Do you know how many times?

8 A Yes, ma'am, two times for a, a couple of hours each.

9 Q So, if you added that time up, about how many hours
10 total would you say you talked to the defendant?

11 A Approximately nine hours.

12 Q Two times, several hours each, right?

13 A That is exactly correct, ma'am.

14 Q And when you do your interviews or your, collect your
15 information, who gave you the list of people to talk to?

16 How did you get that information?

17 A I make this up myself. Sometimes I talk to the
18 investigator to get other ideas or the mitigation
19 investigator. But when I talk with the, with a client, the
20 person I'm evaluating, I ask them questions and I generate
21 from that, make up a list of all the people who have been
22 important in their lives that I ask the mitigation
23 investigator are there any other people you know of who've
24 been important. And then I ask to be given all the records
25 that have been obtained from the point that I'm suppose to

1 begin my study up to the point where I'm suppose to end it.
2 And when I talk to family members or see names in the
3 records, I may add that to my list as well. So, I generate
4 my own list.

5 Q And maybe my question wasn't very clear.

6 The mitigation investigator, is that someone who works
7 for you?

8 A Oh, no, ma'am, that's, that is part of the, the defense
9 group.

10 Q Oh, okay.

11 A I ask them for suggestions of anyone I might missed so
12 I'm thorough.

13 Q So, you do get the names from someone working with the
14 defense, the, the mitigation investigator?

15 A I may get a couple from them, but certainly not the
16 majority.

17 Q You talk to the defendant in almost -- well, a lot of
18 his relatives, is that correct?

19 A Yes, ma'am.

20 Q And you talk to them after the defendant had been
21 noticed for the death penalty, correct?

22 A I believe this is correct, yes, ma'am.

23 Q It was three months ago?

24 A Yes, ma'am.

25 Q So, let me ask you, did you talk to Chuck Emory?

1 A No, ma'am.

2 Q Did you talk to Chris Morgan?

3 A No, ma'am, I did not talk to the family of the Emory's.

4 Q Did you talk -- well, he's not a family member.

5 Did you talk to Holly Melton?

6 A No, ma'am.

7 Q Did you talk to Michelle Burgess?

8 A No, ma'am.

9 Q Eric Vinson?

10 A No, ma'am.

11 Q Henry Richardson?

12 A No, sir.

13 Q Did you talk to any of the defendant's coworkers at

14 Burger King?

15 A Yes, ma'am.

16 Q Well, who did you talk to there?

17 A To Jamie Swink, Swink.

18 Q Okay. Did you talk to his parole officer?

19 A No, ma'am, I read the parole records. But I didn't

20 speak with them.

21 Q Didn't speak with a probation officer?

22 A No, ma'am, I read that, both reports as well.

23 Q How about prior cellmates from when he had incarcerated

24 previously, did you talk to them?

25 A No, ma'am.

1 Q How about his, the Department of Corrections officers
2 that guarded him when he was in prison, did you talk to
3 them?

4 A No, ma'am, I read their reports. I did not speak with
5 them directly.

6 Q Did you talk to crime scene investigators in this case?

7 A No, ma'am, I wasn't suppose to go that far into the
8 time line.

9 We're talking about the tragedy, the crime scene?

10 Q We're talking about the murders of the Emory's, yes,
11 ma'am.

12 A I---

13 Q That's why you're here.

14 You didn't talk to anybody relating to that?

15 A I'm well aware that that's why, why we're here. I'm so
16 sorry. And no, ma'am, that was not my area that I was
17 suppose to cover. So, I did not.

18 Q So, you weren't suppose to cover anything that related
19 to this exact crime?

20 A I was -- in answer to your question, I'm trying to
21 decide whether to say yes, ma'am or no, ma'am. I guess I'll
22 say I don't know, ma'am.

23 Q Okay.

24 A Because my job was to do the social history in this
25 case. That's what I was asked if I would do, and that I

1 agreed to do. Other professionals, my understanding was,
2 were going to cover that. As much as I might of wanted to,
3 that's not something that I was asked to do nor did I do it.

4 Q So, when you try to determine your social history and
5 what was going on back here, you obviously weren't there
6 yourself, so you relied on notes and what people tell you,
7 correct?

8 A Part of what I do is exactly that, ma'am. And then I
9 also, when you say notes, yes, ma'am, I rely on the
10 extensive, in this case, extensive hospital and out-patient
11 psychiatric records as well as the collateral interview,
12 interviews with individuals who weren't family members.

13 Q Probably the same things Doctor Schwartz-Watts would of
14 relied upon?

15 A I don't know the answer to that. I'm so sorry.

16 Q That's okay.

17 Did you prepare a report?

18 A No, ma'am.

19 Q You weren't asked by the defense to prepare a report in
20 this case about the social history?

21 A I was not asked to do that, which is the usual case.
22 I'm not usually asked, when I do social histories, to
23 prepare a report.

24 Q But you could prepare one if you had been asked?

25 A If it had been insisted on, I certainly would of done

1 it. But I have to say to you in all honesty I was glad I
2 wasn't since I was so busy.

3 Q Okay.

4 A But it's often thought not to be necessary because all
5 these charts are used to help, you know, explain things.

6 Q You said yourself assessment starts prior to birth and
7 I think you mentioned the defendant's mother being struck
8 while the defendant was still in-utero.

9 Is that the violence that you were depicting on the
10 chart?

11 Is that what you were talking about from the
12 defendant's father to him?

13 A That is part of it, ma'am. And just to be clear, I
14 really didn't do an assessment in terms of an evaluation or
15 diagnosis of Tony Torres cause I don't do that in South
16 Carolina.

17 Q Right.

18 A But yes, ma'am, in part, it was the hitting of mom,
19 Lisa, while pregnant with him. But then they're other acts
20 of violence toward Lisa. A lot of it emotional. And other
21 acts of violence by father, Tony, toward Tony that I didn't
22 discuss -- once he just punched him in the nose and knocked
23 him to the concrete, for example.

24 Q See, this is the first time we're hearing about this.
25 You got all that from your notes?

1 A I got that from talking with Tony, and from talking
2 with the, case managers at the group homes, yes, ma'am.

3 Q Okay. And you did look at his school records and
4 remember him being successful in school?

5 A That, the golden year, when he was diagnosed with
6 bipolar, it was a, a splendid report card, excuse me, a
7 splendid report card, all kinds of ribbon and all. But
8 then, with a couple of years, that was lost, that diagnosis.

9 Q Did you actually talk to his teachers from that time?

10 A No, I tried to find her and I couldn't. So, I just had
11 the report card with all the comments that she had written
12 on it.

13 Q Did you talk to the psychologist who performed IQ
14 testing on him?

15 A No, ma'am, I did see the reports of the psychologists
16 and psychiatrist.

17 Q Did do any psychological testing yourself?

18 A On, no, ma'am. I'm not suppose to do diagnoses in this
19 kind of situation. Just get the social history.

20 Q You said you tried to have more than one source for
21 your information, but in a lot, some cases that was not
22 possible?

23 A I was---

24 Q But you couldn't tell us precisely which situations?
25 Is that accurate?

1 A No, ma'am, I really thought that I had more than one
2 source in all of them. But I wanted to be honest and I just
3 couldn't remember each single one. So, I wanted to just
4 add, you know, maybe there was one where I didn't have more
5 than one source. For most of them though, I would say that
6 I had more than one source whether it was in the family or
7 among the case managers or from the records I reviewed.
8 There's certainly a lot of information in this case.

9 Q So, if you talked to the defendant and his mom, you
10 would consider that double source?

11 A I would consider it double sourced, and I would look
12 for other sources as well.

13 Q Okay. I'm gonna take a look at your chart for one
14 second, and I don't know the best way to do this. I
15 probably can just stand back here honestly.

16 Taking a look at this chart, and I see that you've
17 indicated where there have been some mental illness, can you
18 identify which one of these individuals, other than the
19 defendant, actually killed somebody and I'll step closer if
20 you need me to?

21 A Thank you.

22 I'm not aware of any of them having done that with the
23 exception of the brother, Tito.

24 Q Well, that was himself though.

25 A Yes, ma'am.

1 Q Talking about which one of these actually, because of
2 their mental illness, struck out and actually killed someone
3 else. That's what I'm asking you.

4 A I see. Thank you.

5 Q Uh-huh. (Affirmative).

6 A I'm not aware of any of them having done that.

7 Q Okay. So, based on your collection of evidence and
8 your history, your opinion is what exactly, your expert
9 opinion?

10 A My opinion is that having done a family history on
11 Mr. Tony Torres, that I think that he was not properly and
12 consistently diagnosed with the proper diagnosis thereby
13 leading to his not being medicated properly nor getting the
14 proper kind of therapy and treatment making even worse an
15 already difficult situation.

16 Q I mean let me pause here for a second.

17 A But---

18 Q You're talking about his medications and diagnosis, but
19 you've already told this jury you're not a psychiatrist,
20 right?

21 A I'm sorry. I thought you wanted my expert opinion on
22 his history.

23 Q Well, I want your expert -- I guess that's what I'm
24 asking.

25 what is your expert opinion as it relates to this case?

1 A That he turned to food as an, alcohol and drugs as a
2 substitute for the love that he was never able to, to get
3 from his father and had great difficulty getting from his
4 mother, no criticism of her because she was so overwhelmed,
5 that he became a depressed person who left a program perhaps
6 before he should have and perhaps without the tools that he
7 needed to to have done what we would of hoped he would of
8 done in society, that because of his depression and bipolar
9 disorder, he turned to self-medication to the extent that,
10 as you suggested earlier, here we are today.

11 My expert opinion is that his self-medication, his drug
12 addiction, and his alcohol addiction greatly impaired his,
13 greatly, greatly impaired him as a person and that all of
14 his history kind of leads to that in some very sad and awful
15 way.

16 Q So, he's an addict?

17 That's your opinion?

18 A I don't make diagnoses in South Carolina and that kind
19 of smacks of a diagnosis. So, I'm talking more of
20 descriptively and I, I---

21 Q That's---

22 A ---I appreciate what you're asking. I really do. So,
23 I'm trying to be descriptive.

24 Q well -- and that's fine.

25 A Thank you.

1 Q We'll take it for what you said.

2 A Okay.

3 Q But you're not telling the jury there's anything in his
4 background that made him bludgeon and rape the Emory's, are
5 you?

6 A Since that was not, not my job to do that, I can't even
7 begin to answer that question with the kind of accuracy and
8 honesty I've tried to bring to this courtroom today.

9 Q Let me ask you a more general question.

10 You're not suggesting that the, everyone's who
11 experiences abandonment in some form is going to go out and
12 kill someone, are you?

13 A Well, ma'am, I would -- I caught myself in time. I'm
14 not -- I almost answered. I'm not suppose to get into that
15 area. So, I'm just going to say to you that all of the
16 things that happened to him, so much more than the
17 abandonment, all of the things that shaped him, along with
18 whether it was neurological or seizures, I don't know, all
19 the things they said in the records that made him who he was
20 that was what was my job to bring to you today, and I, I
21 hope I've helped with the understanding of him. I truly do.

22 Q So, essentially abandonment, low self-esteem, lack of
23 love, you can't say that that makes somebody kill somebody?

24 A Since I can't talk about the tragic killing, I hope all
25 the things, in addition to what you said I thought to

1 describe them, I hope they will all be factored together in
2 your understanding.

3 Q Okay.

4 A Thank you.

5 SOLICITOR CRICK: I have nothing further, Your Honor.

6 THE COURT: Redirect?

7 MR. ALLEN: No, Your Honor.

8 THE COURT: Were you asking for this witness to be
9 excused?

10 MR. ALLEN: Please, Your Honor.

11 THE COURT: Any objection?

12 SOLICITOR CRICK: No, sir.

13 THE COURT: Ma'am, you may step down. You're free to
14 go.

15 WITNESS: Thank you, judge.

16

17 * * *END OF REQUESTED TRANSCRIPT OF RECORD* * *

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C E R T I F I C A T E

I, Pamela E. Green, Official Court Reporter for the Seventh Judicial Circuit of the State of South Carolina, do hereby certify that the foregoing is a true, accurate and partial Transcript of Record of the proceedings had and evidence introduced in the trial of the captioned case, relative to appeal, in the Court of General Sessions for Spartanburg County, South Carolina, on the 22nd day of October, 2008.

I do further certify that I am neither of kin, counsel nor interest to any party hereto.

November 6th, 2008



PAMELA E. GREEN, Court Reporter

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STATE OF SOUTH CAROLINA
IN THE COURT OF GENERAL SESSIONS
COUNTY OF GREENVILLE

STATE OF SOUTH CAROLINA :
: TRANSCRIPT OF RECORD
-vs- : Volume I
: November 26, 2007
JEFFREY MOTTS :

November 26 - December 4, 2007
Greenville, South Carolina

B E F O R E:

HONORABLE LARRY R. PATTERSON, Judge.

A P P E A R A N C E S:

ROBERT ARIAIL, ESQ.
BETTY STROM, ESQ.
Attorneys for the Plaintiff
STEPHEN HENRY, ESQ.
CHRISTOPHER SCALZO, ESQ.
Attorneys for the Defendant

MARY E. DIGIROLAMO
Court Reporter

DEFENDANT'S
EXHIBIT
44
4-21 4630 HT

1 and raise your right hand.

2 MARTI LORING

3 Having been first duly sworn, testified as follows:

4 THE CLERK: Thank you. Please be seated.

5 THE WITNESS: Thank you.

6 THE CLERK: Please state your full name for the
7 record.

8 THE WITNESS: Dr. Marti Loring.

9 THE CLERK: Thank you.

10 THE WITNESS: Thank you.

11 DIRECT EXAMINATION

12 MR. SCALZO: Dr. Loring ---

13 THE COURT: Do you want to spell your last name for
14 the court reporter?

15 THE WITNESS: Certainly, Your Honor, L-o-r-i-n-g.

16 BY MR. SCALZO:

17 Q Dr. Loring, good afternoon.

18 A Good afternoon.

19 Q Can you tell the jury what your current profession
20 is?

21 A I'm a clinical social worker and a sociologist.

22 Q And how long have you been a clinical social worker
23 and a sociologist?

24 A For over 30 years.

25 Q Can you describe for the jury what a clinical social

1 worker does, what it means?

2 A Yes, sir. A clinical social worker is a
3 professional who tries to get to know people both in
4 terms of what their own thinking, what their own thought
5 processes are, their personality, and then also how they
6 interact with other people. And so trying to get to know
7 the inside head and then the outside, their behaviors,
8 looking at their history, and records about the person to
9 understand how they come to behave the way they do.

10 Q Would you please tell the jury about your education
11 and training?

12 A Yes, sir. I went to undergraduate school at Vassar
13 up in Poughkeepsie, New York, where I majored in
14 Psychology. And then I went to just outside of
15 Philadelphia a graduate school called Brimmer
16 (phonetically) where I took a Master's Degree in Social
17 Work and Research. And then I went down to Atlanta,
18 Georgia, and after working a while I went and got my
19 Doctorate in Sociology at Emory, with a major in Social
20 Psychology.

21 Q All right. And can you summarize for the jury as
22 well your professional background since leaving Emory?

23 A Yes, sir. When -- I started off working in an
24 agency that specialized in helping disturbed children and
25 their families. I then went on to work in the area of

1 family violence and a battered woman's shelter and with
2 primarily men who were abusive. I work with batterers.
3 After that I worked in an agency that helped families
4 that had some sort of violence within them, or did family
5 therapy. I went to the Center for Mental Health in Human
6 Development that we created in 1979 and have been there
7 at the center ever since, doing teaching in colleges and
8 presenting workshops across the country.

9 Q Have you done any research?

10 A Yes, sir.

11 Q Can you tell the jury in what areas you've done
12 research?

13 A In areas that relate to trauma and abuse primarily.
14 Some research in areas of leadership, what makes a good
15 leader, but primarily in areas having to do with
16 violence, trauma, depression, anxiety and abuse.

17 Q Have you published any articles, books, or any other
18 professional writings?

19 A Yes, sir.

20 Q Can you tell the jury a little bit of summary about
21 that publishing?

22 A I have written two books, both having to do with
23 abuse and trauma, and either authored or co-authored
24 several articles that -- that have to do with when --
25 when does violence occur, under what conditions, what can

1 be done to prevent it, a lot of it has to do with
2 batterer's persons syndrome, what are some of the
3 symptoms of trauma, how does someone get traumatized, and
4 how do you prevent it, or how do you get help with it
5 once you have it.

6 Q Okay. Are you professionally licensed?

7 A Yes, sir.

8 Q Where?

9 A In the State of Georgia.

10 Q And what is your license?

11 A It's called LCSW, Licensed Clinical Social Worker.

12 Q Do you -- where do you do work? In what location,
13 geographically?

14 A In the Atlanta area. In the greater Atlanta area,
15 we do a lot of our evaluations, writing, treatment. I
16 don't do too much treatment anymore because I don't have
17 much time. But in the terms of seminars, the training
18 and all, and some evaluations we do it across the
19 country.

20 Q Have you testified as an expert witness in court
21 before?

22 A Yes, sir.

23 Q In South Carolina?

24 A Yes, sir.

25 Q In other states?

1 A Yes, I have.

2 Q Have you been qualified as an expert in a death
3 penalty case before?

4 A Yes, sir, I have.

5 Q In South Carolina?

6 A Yes, sir.

7 MR. SCALZO: Your Honor, at this time the defense
8 would offer Dr. Loring as an expert in social history,
9 analysis, and assessment, as well as trauma and abuse
10 analysis.

11 THE COURT: Voir dire from the State?

12 MR. ARIAIL: Dr. Loring, good to see you again. We
13 have no questions or objection at this time.

14 THE COURT: All right. She may express her opinions
15 in those areas.

16 MR. SCALZO: Thank you, Your Honor.

17 BY MR. SCALZO:

18 Q Were you asked to do an analysis of Jeffrey Motts by
19 us?

20 A Yes, sir, I was.

21 Q And what kind of analysis did you do?

22 A I did a psychosocial evaluation analysis of Mr.
23 Jeffrey Motts.

24 Q Can you describe or explain to the jury what that
25 is, a psychosocial analysis?

1 A It's looking at the individual along the lines as I
2 told you before, not just, you know, what's going on
3 inside his or her head, that, but also how do they behave
4 with people, and what is their history, how did they come
5 to do the kinds of things they did. And part of that is
6 reviewing records and doing interviews where you're
7 talking with individuals who's seen them at the times you
8 yourself haven't.

9 Q Is the analysis, the psychosocial analysis that you
10 just described, is that something that a clinical social
11 worker is trained to do?

12 A Yes, sir.

13 Q And you were trained to do that in your education
14 background?

15 A Yes, sir, I was.

16 Q Describe for us the process in a little more detail
17 than you just did of this type of analysis?

18 A It's very important I think to look at various kinds
19 of records. A person's medical records from the time
20 that they were born, you know, child right on up. Their
21 mental health records, to see, you know, have they had
22 any mental health problems. What were they. How were
23 they treated. Did it work. It's important to look at
24 criminal history as well. Then interviews, I think are
25 very important. That is, with family members who saw the

1 person growing up. With the people who are a little
2 further a distance from family, such as friends of the
3 person. It's very helpful to me to talk with another
4 mental health professional who has seen the person a
5 little more recently to get a sense of their mental
6 health issues. And then if possible to talk with
7 individuals who are just totally unrelated to the person
8 but have seen what kind of stresses they may or may not
9 have been experiencing around the time of an incident if
10 indeed that's what happened.

11 Q Is the subject, in this case would be Jeff Motts, in
12 this type of analysis the primary source of the
13 information that you gather?

14 A No, sir. He's certainly one source, but the records
15 and the other interviews are very important sources as
16 well.

17 Q When you are interviewing the subject, is there a
18 way to know whether they're faking it? I think the
19 mental health professional term is malingering? Is there
20 a way for you to deal with that?

21 A Yes, sir. Most all of us in mental health try to be
22 careful about that, especially when there is any kind of
23 court activity involved, or diagnostic manual called the
24 DSM4, though I'm not diagnosing today, but even in terms
25 of descriptive analysis, the manual which lists the

1 symptoms tells us to be alert to faking it, you know,
2 lying, malingering, when there's any kind of court issue
3 involved. So you know, most of us try to be very careful
4 of that. I myself try to, you know, talk with
5 individuals who've seen the person at time when I
6 haven't, have made a diagnosis, or evaluations of the
7 person, as well as interviewing, you know, anyone else
8 who would seem to be valuable such as another mental
9 health person. And there's some trauma tools that are
10 descriptive, that is you can use them and if -- and get a
11 sense of whether a person is consistent in what they're
12 saying. That is you may ask them hundreds of questions
13 to explore their trauma, but they don't always know, you
14 know, what your questions are getting at, because each of
15 them are different. They're phrased differently. And if
16 someone is lying or malingering, you know, you can see
17 that what you're trying to get at they may answer yes
18 sometimes and no other times, because they're not aware
19 you're asking for the same kind of information. That
20 kind of inconsistency, they can get caught lying without
21 knowing that they're giving different answers to the same
22 basic question, just asked in different ways. I find
23 that very useful. I found a very number of people who
24 have been faking it, or malingering, you know, through
25 that kind of tool.

1 Q In that description you used the term trauma tools.
2 Can you describe that a little bit more for us, what
3 trauma tools are?

4 A Yes, sir. There are a number of them, such as the
5 clinician administered PTSD scale, called C-A-P-S, CAPS,
6 the trauma belief inventory, the trauma symptom
7 checklist, and it involves asking someone questions and
8 then, you know, watching their responses. And again,
9 they're very useful because the person certainly can get
10 caught trying to give one impression when that isn't
11 really true. It's like if someone asked you a hundred
12 questions and 50 of them were aimed to get the same kind
13 of information from you, but they're asked in different
14 ways, and you didn't answer them all with the same kind
15 of answer, you will get caught malingering. If you were
16 telling the truth no matter how someone asked you for the
17 information, it's going to be the same regardless of how
18 it's asked or answered. So they are very useful in that
19 respect.

20 Q This description that you just gave about uncovering
21 people when they are faking it, and -- is that a common
22 practice for social workers and counselors to use that
23 technique?

24 A Yes, sir, many -- many of us do.

25 Q Do you need to be a psychiatrist, or psychotherapist

1 in order to utilize those tools?

2 A Oh, no, sir.

3 Q Let's talk you -- you described it as an analysis.
4 Does the analysis require you to make a diagnosis? Let's
5 talk about that distinction for a moment.

6 A No, sir.

7 Q And describe the distinction between the analysis
8 and the diagnosis?

9 A Well, when you're making a diagnosis it's like if
10 you went into a doctor's office and the doctor gathered
11 the symptoms that you were experiencing, maybe took some
12 proper tests, blood tests, whatever, and gave you a
13 diagnosis of what the doctor felt was wrong with you, as
14 well as suggesting what could be done for you to get
15 better. Whereas when you're doing kind of a psychosocial
16 history and analysis, as in this case, I mean, there are
17 many diagnoses already out there. So I didn't need to do
18 that. I just would gather in all of the description of
19 symptoms, and patterns in his life, and diagnoses, and be
20 able to talk about them from a perspective of what are
21 the patterns here, what do you see throughout this
22 person's life, in terms of the problems and the ways of
23 behaving, ways of reacting.

24 Q Are you qualified to make certain diagnosis?

25 A Yes, sir.

1 Q Okay. And can you tell us if it was necessary in
2 this case to make any specific diagnosis?

3 A No, sir, so many had been made I didn't feel it was
4 necessary.

5 Q Through your training, and background, and
6 education, are you able to determine, I guess, the
7 credibility of any diagnosis that might come up in
8 someone's record?

9 A Yes, sir.

10 Q Are you able to explain those prior diagnosis?

11 A Yes, sir.

12 Q Is that kind of analysis, would that be a fair way
13 to describe that?

14 A Yes, that would be a good way to describe it,
15 accurate.

16 Q Is that part of your training as a social worker,
17 clinical social worker?

18 A Yes, it is.

19 Q Have you found any prior, or previous diagnosis with
20 regard to Jeff Motts?

21 A Yes, sir, many.

22 Q And so let's talk about your findings. Please
23 describe for the jury what your findings were as they
24 related to Jeff Motts?

25 A Well, in general that Jeff Motts has had a life long

1 history of severe anxiety, depression, symptoms of trauma
2 and psychosis.

3 Q Okay. Do you any these findings make Jeff not
4 responsible for murdering Chuck, or the 1995 murders?

5 A Not in my opinion. In my opinion he's responsible
6 for the murder of Chuck Martin and the 1995 murders.

7 Q So do your findings justify any of these murders?

8 A Not in my opinion they don't. The findings don't
9 justify them, no, no, sir.

10 Q What role does your findings, or do your findings
11 play in these prior crimes and the crime that we're here
12 for today?

13 A I believe that the findings help understand the
14 patterns, and the history, and the personality of Jeff
15 Motts and help to explain why he would behave as he did.

16 Q Okay. Is family dynamic part of what you would look
17 at in this psychosocial analysis?

18 A Yes, sir, it is.

19 Q Did you do that in this case?

20 A I did.

21 Q Can you describe for the jury a little bit about
22 Jeff's family dynamics?

23 A His -- his family history includes reported family
24 violence. His mother Brenda describes ---

25 MR. ARIAIL: Your Honor, I'm gong to object to her

1 repeating hearsay. I think up until this point I have no
2 objection, but to repeat what the mother said, she can
3 repeat what her opinion is and how she interpreted that,
4 but not what the mother said, because his mother -- I
5 object, it would be hearsay. She's not here to be
6 cross-examined as to the veracity of that statement. I
7 have no objection to her stating her opinions and the
8 basis of her opinions under the rules, but not specific
9 hearsay.

10 THE COURT: Before I could rule on that, Mr. Scalzo,
11 you've got to lay a foundation of how she knows, what she
12 was going to testify to about what the mother said.

13 MR. SCALZO: Sure, fair enough, Judge. Thank you.

14 BY MR. SCALZO:

15 Q Let's start here. Have you -- don't tell us what
16 the opinion is. Have you formulated an opinion about the
17 family dynamics?

18 A Yes, sir.

19 Q Describe for the jury, without telling us anything
20 anyone said, how you came to that opinion about family
21 dynamics? What did you do?

22 A I interviewed various family members, and I reviewed
23 records that describe the family dynamics by social
24 workers, psychologists, and psychiatrist who worked with
25 the family as Jeffrey Motts was growing up.

1 Q Okay. And based on what you've read, heard, seen,
2 do you have an opinion or a finding about the family
3 dynamics?

4 A Yes, sir.

5 Q Can you describe that for us, please?

6 A There was family violence in which his father at
7 times drank excessively and beat and threw his mother
8 across rooms through sheet rock walls. The father also
9 physical abused his brother David. Jeff Motts witnessed
10 a great detail of this abuse, which was ongoing. It
11 wasn't just once or twice. Because our research showing
12 that children witnessing abuse can become very anxious
13 and depressed, because of that the records of treatment
14 of Jeff Motts and his family indicate that indeed Jeff
15 Motts was reacting very strongly and with a great of deal
16 anxiety to this physical and emotional abuse that he
17 witnessed and experienced in himself and his family.

18 Q Can you describe for the jury, without telling us
19 what's in the documents, but the various kinds of
20 documents that you reviewed regarding that finding and
21 sort of a time frame of -- of the documents?

22 A It started off, the documents begin when Jeff Motts
23 was three years old being treated for severe migraines.
24 The headaches were so severe that he would crawl around
25 on the floor crying in pain, and the doctors were trying

1 to treat him with different kinds of medicine for that.
2 The documents progressed to when he's seven or eight
3 years old when he experiences throughout his childhood a
4 great deal of anxiety, a great deal of concern about the
5 abuse in his family. He's -- he's described as he grows
6 a little older as being very depressed in relation to his
7 family, very anxious, and some symptoms of trauma are
8 described as he grows older. In terms of the family
9 dynamics, there appears to be times when Jeff isn't
10 brought to some of the appointments, and other times with
11 the medical staff, and other times when he is. And
12 again, I'm looking at the records and what they're
13 showing. The records progress through his teenage years.
14 Then he's 12, and found to be suicidal, and quite
15 depressed. They go on to when he's 14 and 15, when
16 hospitals cause him to be inpatient because he's so
17 suicidal and depressed that they fear for his life. And
18 then at -- the records show and the family interviews
19 indicate that at 15 he began medicating himself. We call
20 it self-medication. And what it means is that an
21 individual gets into other kinds of drugs, such as crack
22 in this case, as a way of coping with depression and
23 anxiety. From then on the records show that he's never
24 treated as someone who's just joyfully doing drugs, as
25 can happen as we know. That's not what I found in the

1 records. They -- they talk about Jeff Motts as someone
2 who's severely depressed, severely anxious, as well as
3 taking cocaine. And so the effort of the medical
4 professionals is not to just help him get off of the
5 drugs but to try to help him with the family dynamics and
6 with his own -- at this point his own anxiety and his own
7 depression. And this continues throughout his teenage
8 years.

9 Q You mentioned interviews of I believe family
10 members?

11 A Yes, sir.

12 Q Can you tell the jury, not the content of the
13 interviews, but who you interviewed and when it was that
14 you interviewed them? Not specific dates necessarily,
15 but is it recent or years back?

16 A No, recently, within the last couple of months. I
17 interviewed his mother Brenda Motts, his father Gene
18 Motts, his sister Alison Smith, his aunt and uncle Anna
19 and Roger Belk, his grandmother Edith Jackson. And then
20 three other individuals who are not family members.

21 Q And are -- do you have an opinion, or is there a
22 finding with regard to Jeff's current relationship with
23 these family members based on interviews and any of the
24 records that you've looked at?

25 A Yes, sir.

1 Q Is -- can you describe that current relationship, to
2 the extent it can be described?

3 A Yes, sir. It's a very remarkable relationship,
4 since the murders in '95 involved two family members, or
5 one family member and one sort of related individual.
6 But the family members talk about being very forgiving of
7 Jeff, of understanding that his depression, anxiety and
8 drugs led him to behave in a way they don't feel was
9 typical of him. They feel very loving toward him. And
10 were very glad to talk with me.

11 Q Currently in the relationship with the family, is
12 there any evidence that there's remaining dysfunction or
13 not -- an inability to relate to each other?

14 A Yes, sir. There's -- there's a difficulty conflict
15 between his mother and father who are now divorced, but
16 who attempt to -- to be in the relationship together so
17 they can be helpful to Jeff Motts.

18 Q Is there any difficulty between Jeff relating to his
19 parents?

20 A Well, I think there certainly are communications
21 problems. It's sometimes confusing as to, you know, when
22 they're talking, and they don't seem to always understand
23 each other very well, what each has said to the other or
24 to Jeff.

25 Q But are they able to carry out a relationship?

1 A Oh, they are definitely able to carry out a
2 relationship. They all make an effort to -- to be as
3 close as possible. There's been a lot of improvement in
4 this family over the years. They have certainly had a
5 lot of help towards that end. So yes, there is a
6 closeness among them that they work at.

7 Q Now, let's talk about when you were describing your
8 findings earlier. It sounds like you put them in
9 categories. You may need to restate those findings so we
10 can talk about them. Do they fit in distinct categories,
11 your findings?

12 A Yes, sir, I believe they do.

13 Q Can tell us the categories?

14 A Anxiety, depression, and trauma would be the three
15 main categories.

16 Q Can you first in general terms describe for the jury
17 and for the Court, anxiety, what it is and how it
18 manifests itself?

19 A Well, we all get anxious from time to time, you
20 know, for various reasons. But anxiety can run up a
21 scale to people who are severely impaired by it. For
22 example, people may become so anxious they have
23 difficulty breathing. And when anxiety is that severe it
24 can lead to things like panic attacks, where a person
25 reacts with panic and at times can actually strike out

1 and hurt another person, or not be thinking as clearly as
2 under more normal circumstances.

3 Q What about trauma, can you describe again generally
4 real trauma?

5 A Trauma was first really explored carefully back in
6 the '80s when the soldiers were coming back from Vietnam,
7 and some of them behaved very strangely, where they jump
8 out from under a table at a restaurant, shouting
9 incoming, incoming, and thinking there were incoming
10 bombs coming at them. And during that time we've done a
11 lot of research and tried it understand trauma. And
12 found that, you know, if someone is traumatized to a mild
13 extent and then can get over it, that's one thing. But
14 sometimes trauma can be caused by very serious things,
15 you know, fire, the courthouse shootings in Atlanta,
16 living under very violent circumstances, having someone
17 attack you. And those other conditions of trauma can
18 become so strong that a person might not get well by
19 themselves, they may need help. And during that time
20 when they're suffering from trauma, or we call post
21 traumatic stress disorder, they may have symptoms that
22 can cause their functioning to be impaired, really
23 harmed. They -- they can't, you know, function as usual.
24 They may not see red lights when they should. They may
25 react strongly when they believe that they are in danger.

1 Q Okay. And then I think the next thing that you
2 talked about as a category was depression, and that's
3 probably more commonly heard about. But can you give a
4 generalized description of that?

5 A Surely. You know, we all get sad and depressed from
6 time to time. We may lose someone we love for example,
7 or something else. But some people in all these
8 categories, anxiety, trauma, and depression, can have
9 things happen to them over and over to where they develop
10 what we call chronic anxiety, trauma, or chronic case
11 depression, where they seem to have ongoing depression.
12 When the depression gets very strong as opposed to mild
13 depression that many of us that we get over in time, when
14 the depression is very strong, very high, very severe, it
15 can cause a person to feel quite hopeless. As we always
16 worry about someone committing suicide when they are so
17 depressed, either acutely right at that moment, or over
18 time that they don't seem to get better and they seem to
19 continue to feel hopeless. Sometimes they will even tell
20 us, you know, I'd rather be dead, or they may make some
21 minor suicide attempts, or sometimes some major ones. So
22 there's range of depression from what's almost normal in
23 a reaction to a loss to what can be very strong and needs
24 to be healed through medication and counseling, and needs
25 to be guarded against for suicide.

1 Q Before we talk about the specifics as the findings
2 relate to Jeff. Could any of these categories that we've
3 talked about rise to the level of some form of legal
4 insanity or a legal defense, and I'm talking about in
5 general at this point?

6 A In general I would say, yes, sir, some could.

7 Q Do your findings as they relate specifically to
8 Jeffrey amount to anything like that, like legal defense
9 or legal insanity in that way?

10 A No, sir. I'm not talking about him being insane in
11 any way.

12 Q Let's talk about the specific category of anxiety.
13 Would you please describe for us Jeff's history of
14 anxiety?

15 A I brought some -- two charts, one of which is for
16 that purpose. If I may get down and use my chart?

17 MR. SCALZO: Is that okay, Judge? And we'll show it
18 to the solicitor if ---

19 THE COURT: You better show it to them before you
20 show it to the jury.

21 BY MR. SCALZO:

22 Q Okay. Will this chart aid you in describing Jeff's
23 anxiety?

24 A Yes, sir, it would help me to organize my thoughts
25 about it.

1 Q Which one are you referring to?

2 A That one.

3 Q Bear with me one moment.

4 MR. ARIAIL: That's fine. No objection.

5 THE COURT: Okay. That's fine. Do you -- how do
6 want to do that?

7 MR. SCALZO: I think Dr. Loring would prefer if she
8 could stand up and hold it, if that's okay with the
9 Court?

10 THE COURT: You need some help with that easel.
11 Okay. You can do that.

12 THE WITNESS: Thank you.

13 THE COURT: Bobby, you might want to help them with
14 that.

15 THE WITNESS: I would be glad to hold it.

16 THE COURT: Well, just put it up there. It's got to
17 be high.

18 THE WITNESS: Thank you.

19 MR. SCALZO: For whatever reason this part is not
20 working right.

21 THE COURT: Why don't you put it in the center, Mr.
22 Scalzo.

23 MR. SCALZO: In the center, okay.

24 THE WITNESS: Thank you.

25 THE COURT: Ma'am, you have to speak up so everybody

1 can hear you, if you can. If not we'll try to get a
2 microphone for you.

3 THE WITNESS: Thank you, Your Honor. The way I
4 broke this down is to look first at Jeff's childhood and
5 then to look at his adult years. And throughout the
6 records what was found in his childhood were in
7 particular these types of anxiety and depression, but I'm
8 going to focus on anxiety just for the moment. I
9 mentioned to you earlier you he had these severe migraine
10 headaches which are not common in young children. He had
11 them at age three years old and they went up to age 16.
12 The records, the medical records document that the
13 doctors tried different kind of medication and all they
14 were able to do was to make them less frequent. You see
15 them occurring in the records really through his teenage
16 years. As opposed to the kind of headaches many of us
17 get, these were migraine headaches, you know, the
18 throbbing, you know, when you see spots, when you can't
19 move much or it feels like your head is just going to
20 burst. It is very painful. And because -- through
21 interviews I learned that he would, you know, crawl
22 around on the floor, I mentioned earlier, crying and
23 banging his head against the floor as a young child.
24 These are anxiety causing headaches and leave a mark on a
25 child in terms of anxiety throughout their life.

1 Family violence I already described to you. And
2 again, our research now is showing that, you know,
3 witnessing the family violence is very much a causation
4 of ongoing anxiety as a child grows older.

5 Agoraphobia. Jeff -- Jeff Motts began having
6 trouble going to school because he would become terrified
7 of being around crowds of people, even small groups like
8 in a classroom. He was terrified to be around
9 classmates. The family took him to a doctor and the
10 doctor said, yeah, he's has agoraphobia. So that became
11 quite an issue as to how to allow him to continue school
12 and deal with that particular anxiety. That's another
13 form of anxiety.

14 He had a dual type of anxiety that you don't find
15 frequently. Usually if someone has separation anxiety
16 they're afraid to be separated from their family. And
17 Jeff Motts went back and forth between his grandmother
18 and his mother and father, then his mother and father
19 divorced. And when he was found to be so depressed and
20 suicidal, he even spent a little bit of time in a
21 children's home, and then was returned to his
22 grandmother. So he would become very anxious when he
23 left home, or when his mother or father left home. Very
24 anxious at the divorce. But at the same time he would
25 run away from home when they would have arguments. It

1 almost seems like they're the opposite of each other, and
2 it's only a very highly anxious child or adolescent who
3 does both of those two things. You wouldn't normally run
4 away if you didn't want to be separated from someone. He
5 would go back and forth. He would run away when the
6 conflict was going on and then he would get anxious about
7 being separated and he would go back.

8 Another form of anxiety is self-mutilation. When a
9 child cuts on themselves, often their wrists, and Jeff
10 Motts cut on himself. He did self-mutilation. It was
11 noted in the medical records. And it was observed by
12 members of his family. One time in particular when they
13 tried to stop him and he stood with a sharp object, you
14 know, cutting on his wrist.

15 Self-medication is an unfortunate byproduct. It's
16 what can happen when someone, you know, is so anxious and
17 depressed. And you know what that really boils down to
18 is they become involved in taking illegal drugs
19 sometimes, as in this case. And one of the problems with
20 that is once you start, especially with something like
21 crack, it can take you over. And of course that's what
22 happened to Jeff Motts just prior to the '95 murders.
23 Some of his schoolmates gave him some crack and he took
24 it, he -- you know, he didn't stop after that. And as
25 with many young people who are into self-medication, the

1 kinds of crimes that come from that are often theft and
2 things to get money to get more of the medicine they're
3 using to medicate themselves. It's a vicious circle.
4 Then they get more anxious because of what they're doing,
5 and get in trouble with the criminal justice system.

6 Suicidal is the last one in terms of childhood and
7 adolescence. And Jeff Motts is noted time after time in
8 the records as being a suicide risk. He was
9 hospitalized. Different kinds of medication was tried by
10 doctors, and therapy by social workers and psychologists,
11 psychiatrists as well, and it would help and he would get
12 better. Unfortunately he would go back into the
13 conflicting type situation and the violence. And then
14 when he was involved in crack he had to -- what they call
15 a dual diagnosis. He had to deal with his addiction,
16 substance abuse addiction as well.

17 So those are some of the types of anxiety
18 experienced during childhood and adolescence by Jeff
19 Motts. More than you would normally see for one person.
20 But that's what the records accurately show as well as
21 the interviews.

22 BY MR. SCALZO:

23 Q How -- well, I guess, describe for the jury what
24 effect that history has, and I guess perhaps how it
25 manifests itself currently or his adult life?

1 A You know, I -- in general the way it manifests
2 itself is that Jeff Motts is diagnosed in the records as
3 having anxiety attacks, not just the regular kind of
4 anxiety that many of us experience but, you know, strong
5 attacks of anxiety. I don't really have to go through
6 the years so much because it's the same each year. When
7 there's a stress in his life, like the death of his -- of
8 his grandfather, he becomes very anxious and the medical
9 staff in the prisons would treat him through medication.
10 He takes what they call psychotropic medication, which
11 tries to help with anxiety, all during these years. He's
12 described as having panic attacks. One psychiatrist in
13 prison gave him a paper bag so that when he would
14 hyperventilate and not be able to breathe properly,
15 rather than just getting more and more anxious about it
16 there is a system where you breathe in and out of a paper
17 bag, it can calm you down, give you more carbon dioxide.
18 It can help a person to breathe properly. And the
19 psychiatrist did that for him. Just, you know,
20 throughout the records the way it shows the way it has
21 affected him is by him being a very anxious person with
22 anxiety attacks, and panic attacks. I'm focusing on
23 anxiety right now.

24 Q Okay. And with regard to your review of the
25 records, prison record let's talk about for a moment,

1 what time span did they cover, the prison records that
2 you reviewed regarding any medical?

3 A Primarily '97 to the present time. And you know, in
4 '97 he's noted to be suicidal, '98 his anxiety is noted,
5 although every year it's certainly noted. In '99 he's
6 diagnosed as having psychosis, where you're so anxious
7 you may have hallucinations, hear voices, or see things
8 that aren't there. He's described as hearing things,
9 auditory hallucinations. In '00, in 2000 anxiety and
10 depression is described through the prison records. And
11 then continuing onward there are the panic attacks. And
12 more recently he's noted to have flashbacks, which we'll
13 talk about in just a minute. But that's a trauma symptom
14 that's part of anxiety.

15 Q Before we leave the medical -- current medical
16 records, did you find in the records any records
17 regarding Jeff receiving psychotropic drugs, or visits by
18 a psychiatrist around the time of his murdering Chuck?

19 A Well, it -- I guess the answer would be, no, sir, in
20 that the prison records talk about right afterwards in
21 December of '05, that Jeff Motts, it says in the records,
22 has a history of panic attacks and previous mental health
23 treatment, but not at that particular time.

24 Q Okay. Is that entry after -- that you're referring
25 to after December 8th of 2005?

1 A Yes, sir. It's on December 8th.

2 Q Okay. Let's move to that next category, I believe
3 it would be trauma. And can you make the same
4 description using your chart the trauma history of
5 Jeffrey Motts?

6 A May I get my other chart?

7 Q Sure. Let me first show it to the -- will it assist
8 you in explaining Jeff's trauma?

9 A Yes, sir.

10 THE COURT: Let him see it.

11 MR. ARIAIL: No objection.

12 THE COURT: All right, sir.

13 BY MR. SCALZO:

14 Q Do we need to take this down, or can we can put it
15 in front?

16 A Put it in front, please. Thank you.

17 Q Now, can you tell the jury what this chart is?

18 A This is a chart called post traumatic stress
19 disorder and it notes different symptoms of trauma. I
20 use it in teaching when I teach in college or in
21 workshops across the country. It pulls together the
22 trauma symptoms, I think.

23 Q I guess describe for the jury what is relevant out
24 of that chart to Jeffrey Motts and his case?

25 A Okay. Jeffrey Motts experienced certainly ongoing

1 trauma in his life that we've already talked about some.
2 In the -- in the prison system he had, before the murder
3 of Chuck Martin, a sense of acute terror. So trauma can
4 be chronic like a temperature that's -- that you can't
5 quite get rid of, a mild temperature. Or it can have a
6 peak, where all of a sudden you have a 104 degrees,
7 because you're very sick. And prior to the murder of
8 Chuck Martin, Jeff Motts experienced acute trauma as
9 described to me by someone who was there, in terms of
10 threats by a number of people toward him. And that's --
11 that can precipitate strong trauma, or post traumatic
12 stress disorder. Now, number two, is flashbacks. And
13 through the records, the prison records when there's been
14 an occasional, not real frequent, but occasional strong
15 stresser, Jeff Motts is noted to have flashbacks, and
16 indeed he's described as having flashbacks after the
17 murder of Chuck Martin, although with the kind of care
18 he's getting at the Greenville County Detention Center
19 that seems to be improving.

20 Q Dr. Loring, I'm sorry to interrupt you. Before you
21 move past flashbacks?

22 A Yes, sir.

23 Q Can you describe for the jury, is this something
24 that's simply a person who's having a flashback says I'm
25 having a flashback, or is it something that a

1 professional can make an objective analysis of?

2 A Usually a professional hears someone saying they
3 have a flashback but looks themselves to see if the
4 person's behavior seems to be consistent with them saying
5 that they have a flashback. So that Counselor Pageat
6 (phonetically) at Greenville County Detention Center not
7 only heard Jeff Motts saying he was having flashbacks,
8 but observed him and found other symptoms of post
9 traumatic stress disorder. It usually occurs in the
10 context of other symptoms as well, not just kind of on
11 its own. And as I said, he has a history of flashbacks.
12 He -- he describes flashbacks, for example, back in '95
13 before the murders, as well as after the murder of Chuck
14 Martin.

15 Q And Doctor, a follow up question is, if you found
16 references to flashbacks in the record, is there a way
17 for you to tell whether or not they're reliable from the
18 point of view of the person entering them, or just Jeff
19 saying, I'm having a flashback, and somebody writing down
20 this is what he said? Can you make that distinction from
21 the record?

22 A Well, when I saw flashbacks in the records, it
23 appeared to be, again, in the context of the description
24 of other anxiety symptoms as well, by the mental health
25 professional, as opposed to him just saying, you know,

1 I'm having a flashback.

2 Q Okay. I'm sorry. Continue down your list of what's
3 appropriate.

4 A And the flashbacks are in your mind going back to a
5 previous time, kind of like you're going back in time.
6 But it seems like it's happening right now, very
7 strongly. At that moment it doesn't feel like a thought
8 about what happened back then, it feels like it's going
9 on right now. And only at some point you kind of --
10 someone becomes aware that that's something of the past.
11 While they're having it, it seems like even though it
12 happened in the past it seems like it's going on right at
13 that moment. Like the veteran who ducks down in the
14 restaurant thinking there's shots coming at him and of
15 course they're not.

16 Q How common is that outside of the experience of a
17 Vietnam vet. for instance?

18 A It is not uncommon, for example, among law
19 enforcement officials. When I was helping the deputies
20 after the Atlanta courthouse shootings where the judge
21 and others were killed, some of the deputies are having
22 flashbacks because they saw their colleague, the deputy
23 shot. Some of them saw the judge shot. And they were
24 having flashbacks and, you know, to that time. We had to
25 keep them focused on the present and not let them drive,

1 or anything, where they could be having flashbacks and
2 not notice red lights. So it's really not uncommon among
3 people who experience, you know, traumatic types of
4 events.

5 Q Okay. Thank you.

6 A You're welcome. Just, you know, going kind of
7 quickly through all of this. In choice of thoughts are
8 when thoughts come into a person's head, and you know,
9 many of us have had thoughts come into our head that we'd
10 rather not think about at that time, and we say, I'll
11 think about that later. But when it's really an
12 intrusive thought you don't get to make that choice. You
13 know, the thoughts just kind of come very quickly into
14 your head and you can't get away from them. As in this
15 case, before the murder of Chuck Martin, when Jeff Motts
16 describes feeling himself he was going to be harmed or
17 killed, and those thoughts kept coming into his head and
18 it was very difficult if impossible for him to have the
19 ability to get away from those thoughts, or feel safe.

20 Q Does -- and I'm sorry to interrupt you again. But
21 does that intrusive thought mean that you're no longer
22 able to figure out right, wrong, reason?

23 A When a person has intrusive thoughts they can't
24 concentrate. There's a real difficulty in concentration.
25 So that for example if no one -- none of us should drive

1 when we're having intrusive thoughts after a traumatic
2 incident because it's easy to run through lights, not see
3 when you're coming to a red light. The intrusive
4 thoughts and the difficulty concentrating impair
5 judgment. They impair problem solving. Let's see,
6 here's a situation, here are my choices, I think I'll do
7 this instead of that. That whole problem solving thought
8 process is usually absent when one is experiencing
9 intrusive thoughts and difficulty concentrating because
10 of strong trauma. It's impaired.

11 Q But does the impairment rise to the level of the
12 inability to actually say, this is the wrong thing to do
13 and I'm stopping myself from doing it?

14 A Yes, sir, it's -- it rises in inability because that
15 part of brain just can't work.

16 Q Does it always have to rise to the inability?

17 A Depends on the level of trauma.

18 Q I'm sorry. Continue down your list.

19 A That's quite all right. Sense of hopelessness can
20 be part of the -- a trauma symptom. And throughout his
21 history, you know, starting at, you know, I told you a
22 very early age, and then onward in his teenage years when
23 he was self-mutilating and threatening suicide, Jeff
24 Motts has shown a lot of hopelessness. In fact, it
25 appears that he felt hopeless prior to the murder of

1 Chuck Martin. Hopelessness is when you don't see any
2 solution. You're feeling terrified and you don't see or
3 feel a solution to the situation. We talked about
4 difficulty concentrating. Now, the next one is very
5 important. It's called the dissociative state. It's
6 also called psychic amnesia. It doesn't always occur
7 with trauma but it certainly can. A very mild form,
8 we're driving down the street, we just had a fight with
9 someone we love, we're thinking about I should have said
10 this, he should -- shouldn't have said that, and all of a
11 sudden we noticed we've passed the street that we're
12 going to turn on. We have to double back and turn. It's
13 very mild. We weren't paying attention. We are -- it
14 can be that we were dissociative, you know, weren't so
15 careful driving. If you multiple that, you know, a
16 couple thousands times, we hear people who've witnessed
17 childhood abuse, or family violence, or other kinds of
18 abuse, who are traumatized talking about being
19 disassociated. They don't necessarily deny what they've
20 done but they'll talk about it in terms of they weren't
21 aware that they were doing it. When I talked with Jeff
22 Motts about the murder of Chuck Martin he spoke in that
23 kind of terminology, about a dissociative state. I
24 mean, he knew -- clearly he had done it. It wasn't a
25 question of his not having done it, but he talked about

1 his hands having done it as if he was watching it happen.
2 And you hear traumatized people talking about it as if I
3 was watching myself do something, which sounds crazy.
4 It's really not so crazy. It's disassociative. It's
5 where you're so anxious, or you're so traumatized, it's
6 almost like you can't stand it and you step back from
7 yourself and you can almost see yourself doing things,
8 see your hands doing things. It can be spoken of in
9 different ways.

10 Q And Doctor, are you able to tell us, as a
11 professional or what a professional would be able to tell
12 when someone's talking about this disassociative state,
13 whether they're really having the disassociate state or
14 simply trying to make it appear as if he wasn't -- my
15 hands did it, my mind didn't do it, that kind of -- of
16 arms length distance from having done something wrong?
17 Can you do that?

18 A Well, yes, you can. And one way to do is to make
19 sure that other trauma symptoms are present. Just like
20 if you go to a doctor with an illness, the doctor wants
21 to see all of the symptoms together of a given diagnosis.
22 If you just have a headache that doesn't mean you're
23 going to have a brain tumor. You look for a cluster of
24 symptoms where any one symptom is credible, or
25 believable, or fits in with the rest. And Counselor

1 Pageat at the Greenville County Detention Center also
2 noted symptoms of trauma in Jeff Motts as did others. So
3 that it -- because it's in the context of these other
4 trauma symptoms it makes it more credible.

5 Q Okay. Are there any other symptoms on there that
6 apply to Jeff?

7 A He reports some of these nightmares and trying to
8 avoid thinking about, for example, the murders in '95.
9 Counselor Pageat and someone when he first came into the
10 prison team in '97 talked about him having flashbacks to
11 the '95 murders because he was grieving and traumatized
12 at what he had done. So in the records and his own
13 description he talks about the dreams, the bad dreams,
14 the nightmares. The distress when he thinks and talks
15 about some of either of the two times, the murders in '95
16 or the more recent one. He certainly tries to avoid
17 talking about these things, having to be very firm with
18 him that he needs to talk about them. Hyper vigilance as
19 akin to a panic type of disorder. It's when someone
20 reacts very strongly. They're vigilant. They're aware
21 of what's going on. But if someone comes at them and
22 they fear being harmed, they're hyper vigilant. They may
23 jump. Jeff talked with me about when Chuck Martin would
24 get -- get out of bed to go to the bathroom that Jeff
25 would be very frightened and hyper vigilant about is he

1 going to harm me now or is he just going to the bathroom.
2 That kind of hyper vigilance. In post traumatic stress
3 disorder the repeated traumatic experience makes it
4 worse. You know, if you're -- as the person I talked
5 with who said that Jeff was under the threats of a number
6 of people before the murder of Chuck Martin, those kinds
7 of repeated threats or traumatic experience make higher a
8 person's trauma because they no sooner calm a little bit
9 down from one when here comes another. And depression
10 and desperation sometimes you don't always have to have
11 it. But Jeff is described as feeling depressed both
12 before and right after the murder of Chuck Martin.

13 Q Which leads us into that category of the depression.
14 Can you describe his history and what effect that history
15 of depression has upon him?

16 A Well, with the history of depression that Jeff Motts
17 has along with the trauma, he's a high risk for, you
18 know, for -- and let me just be real clear, we're talking
19 now about depression?

20 Q Yes, and I guess if it has a relationship to any of
21 the other categories I would like you to describe that to
22 the jury as well.

23 A Thank you. I wanted to be clear about that. He's
24 described not just by his prison records as having
25 depression when, you know -- as he was -- I think I

1 mentioned during his teenage years he was not just having
2 fun with drugs. He was very depressed. He was diagnosed
3 as having at one point a major depressive disorder, as
4 well as dependency on drugs. And yes, depression does
5 relate to the anxiety and trauma, because it makes it --
6 it made him, one, a high suicide risk, whether it was a
7 mild depression and threat to hurt himself, or whether it
8 was a more major one, that he was taking psychotropic
9 anti-depressants in prison, and is taking psychotropic
10 med.s now. And he was noted in the prison at times as
11 not seeming to care how he appeared, not taking showers
12 as often as he should, or not dressing as cleanly as he
13 should. And usually was in reaction to some event, like
14 the death of his grandfather, or one of his relatives
15 moved away, I think to one of the northern states like
16 Michigan, where Jeff was afraid he wouldn't see this
17 person much. So he got depressed with that. And when
18 the counselors in prison, you know, talked with him and
19 helped him to express his feelings, helped him with the
20 medication, he seemed to do then much better with his
21 dress, with his proper showering, seemed like he was able
22 to be helped.

23 Q Based on what you have described in the three
24 categories and their relation to the effect they have on
25 Jeff, put in context how common or uncommon these

1 manifestations are that have found in Jeff to the general
2 public who has these kinds of problems? I don't know if
3 that was good question or not.

4 A I understand. For anyone in the general public who
5 has trauma symptoms, who's experienced self-medication
6 like in the '95 murders, and depression and panic, who
7 is -- who experienced threats like before Chuck Martin's
8 death, it would be usual to expect -- and who has a
9 history of trauma and anxiety, it would be usual to
10 expect the kind of panic disorder and anxiety that has
11 been found in Jeff Motts.

12 Q Okay. Do you have training or experience in
13 treatment of any or all of these categories that you have
14 described?

15 A Yes, sir. Sometimes I'm asked to help put together
16 treatment plans for individuals, whether, you know, it's
17 police officers or people in jail, whatever, who have --
18 who experience the trauma, depression, and/or anxiety.

19 Q And if you can give a number, or a generalized
20 number, how many times have you done that for a variety
21 of different people?

22 A Over the years probably in hundreds, between one and
23 two hundred times.

24 Q Okay. Without describing any specific plan, given
25 what your findings are with regard to Jeff, is it

1 possible to come up a treatment plan?

2 A Yes, sir.

3 Q What about -- what can you tell us about sort of
4 control issues as they relate to these kinds of category
5 problems?

6 A If I can, by control?

7 Q The ability to -- for someone with these kinds of
8 problems to control their behavior?

9 A One important aspect of control is learning to
10 communicate well. For example, where Jeff Motts is in
11 jail now, the counselor comes by each day and talks with
12 him and wants to know, you know, if he has any problems,
13 or any needs. And that has been a very effective way of
14 establishing control. Apparently he's become much --
15 Jeff Motts has become much calmer, and he's able to be
16 controlled with that kind of help. So there are methods
17 like that where you encourage on a rather frequent basis
18 someone to tell you what they're feeling, you know, where
19 are they with trauma, or with depression or anxiety. And
20 if that person is motivated then that can be a very
21 useful way to keep tabs on where they are and what -- or
22 if their medication is working for example.

23 Q I know you don't have a formalized treatment plan,
24 but how labor intensive might such a treatment plan be
25 for someone with the kind of problems you've described?

1 A I don't think it's labor intensive, you know, to,
2 you know, check on someone each day or every other day to
3 see if the medication is controlling their symptoms, to
4 make sure they're still motivated to control themselves,
5 and to communicate with you if their fear is overriding
6 that, or they think that could happen. I found -- Jeff
7 Motts talked about his sense of -- well, he talked about
8 his feelings about the '95 murders, and he talked about
9 his thoughts and feelings about Jeff -- about -- Jeff
10 talk about his feelings about Chuck Martin's murder, and
11 he is appearing to be motivated in working with the
12 counselor at Greenville to be able to communicate, to be
13 able to control criminal himself. It's hard to control
14 someone unless they're trying themselves. And he's felt
15 to be trying himself now too.

16 Q This checking in on and encouragement that you were
17 describing, is it something that takes hours, minutes?
18 Can you give us a time frame for what would be required,
19 or needed to help with that?

20 A No, it's a matter of minutes really. And it doesn't
21 even have to be encouraging. It can be a gathering of
22 information.

23 Q Can you first talk about in general and then we'll
24 talk as it relates to Jeff. In general, a person who has
25 one or all three of the categories that you've described,

1 can you talk about the ability for that person to express
2 it, whatever it is, emotions they might even be feeling,
3 whether it's remorse or not having remorse? Can you talk
4 about that, the effect it would have on their ability to
5 do that?

6 A It's very hard for a person to express their
7 feelings about an event when they're busy trying to avoid
8 anything that reminds them of that event. The stress and
9 exposure to traumatic cues, means you don't want to talk
10 about it, because when you talk about it you start having
11 difficulty, as with Jeff Motts, there's always the
12 possibility you could have a panic attack, or an anxiety
13 attack. You know, sometimes, you know, you may be able
14 to talk about it. But on the whole a person with these
15 kinds of symptoms is likely to try to avoid it because
16 when they do talk about it they become, you know, more
17 anxious. Therefore it's hard to be expressive of sadness
18 or whatever the feeling might be when you're busy trying
19 to avoid thinking about it, or talking about it, because
20 it makes you feel very anxious and traumatized. It might
21 make you have flashbacks. You don't want to -- effort to
22 avoid traumatic memories, you don't want to remember it.
23 Which is not to say someone is incapable of doing that,
24 but they're more capable of expressing their feelings
25 when they feel safe, as opposed to when they don't feel

1 safe?

2 Q If the person -- or if a person who doesn't have the
3 training, the clinical social worker, or a psychiatrist,
4 or some other mental health professional were presented
5 with somebody with these categories of problems, would
6 the average person have the ability to pull out and
7 understand the difficulty that somebody would have in
8 showing remorse, sadness, or any other emotion?

9 A It would be very difficult. And what we find is
10 that sometimes people who later express a great deal of
11 remorse, under safe circumstances, when they're working
12 with a clinical person, didn't do it before then. You
13 know, before then they may appear kind of cold, or they
14 may appear uncaring, because they're really trying not to
15 feel anything. To feel anything is to feel anxious,
16 depressed and traumatized. So that can be one thing that
17 can happen. A person can just act kind of cold. And
18 when someone is disassociative, you know, they don't
19 usually have a lot of feelings. They kind of -- they
20 almost look careless, uncaring, because it's almost like
21 being in a daze. It's not being in touch with your
22 feelings like people normally would. Another thing we
23 find, especially with men who are having trauma and
24 having a history of anxiety and depression, and terror,
25 where anxiety/terror depression is that sometimes men act

1 with a kind of sense of bravado. They act, like, well,
2 you know, it doesn't matter what I did, or I'm glad what
3 I did for this reason or that, as a cover up to whatever
4 the terror is that they're feeling at the time. And
5 sometimes they're able to acknowledge later that that
6 act, or whatever it was, was to deal with their trauma,
7 to deal with their anxiety, to deal with their fear, kind
8 of acting like it didn't matter, and they could care
9 less, and they're very brave. And later when they break
10 down, it's clear that that wasn't the case at all.

11 Q Let me ask you then about in Jeff's statement. I
12 think that you were in here when it was read. But the
13 last part of his statement was, I want to tell the
14 solicitor that I don't want to waste a bunch of money on
15 a trial because I already got two life sentences and a
16 third won't be any worse. Is there any relation to that
17 to what you just talked about, the bravado, to that kind
18 of statement?

19 A Well, I think there is. I think it's -- it's
20 depression, someone whose thought about hurting or
21 killing themselves, you know, any number of times during
22 their life. And there can be a bravado in saying that by
23 someone, you know, who may care very much if indeed they
24 do live.

25 Q Okay. Is it -- the word that comes to me is safe, I

1 don't know if that's the right word. I guess is it sort
2 of professionally responsible to read that sentence and
3 then jump to the conclusion of any lack of remorse, or
4 the lack of the ability to recognize you've done
5 something wrong, or anything like that? Is there
6 something more that's required to make that conclusion,
7 if you were looking at that one sentence?

8 A Well, speaking for myself, you know, I sure would
9 want to know more about the situation than that one
10 sentence. I would want to know, you know, where that
11 really came from and if it was false bravado, you know,
12 if -- if that indeed was the case, or it came from
13 depression, you know. I'd want to kind of factor those
14 things in in interpreting that kind of statement. And
15 another -- another reason for that kind of statement can
16 be someone who -- who really feels very badly, what word
17 can I use, someone who feels what we call remorse about
18 what they've done, can feel that sense of we call it
19 anguish, or anger at themselves, you know. And certainly
20 Jeff has been -- Jeff Motts has been reported by others
21 whom I've interviewed and indeed speaking with me has had
22 a lot to say about his -- his own behavior in the '95
23 murders, his feelings about them, his feelings of
24 remorse, as well as he has told others and certainly
25 talked to me about it, his feelings about Chuck Martin's

1 murder. So he has a lot of anguish and anger at himself
2 that he did these things to people he doesn't think
3 deserved to have them done. He feels -- his own
4 depression can be part of such a statement.

5 MR. SCALZO: Thank you, Doctor. Please answer any
6 questions the solicitor might have for you.

7 THE WITNESS: Sure.

8 CROSS-EXAMINATION

9 BY MR. ARIAIL:

10 Q Dr. Loring, good to see you again, ma'am.

11 A Thank you, sir.

12 Q Just a couple of questions. It's obvious based on
13 your evaluation that you believe that Jeff Motts has a
14 lot of problems, a lot of emotional issues?

15 A Yes, sir, based on what the other mental health
16 professionals had said, that does appear to be case.

17 Q Right. I mean, what you just went through in
18 describing all of this, he's got a lot of -- a lot of
19 emotional problems, and a lot of conditions, emotional
20 conditions, is that a fair statement?

21 A Yes, sir. I think that others have said that, yes,
22 sir.

23 Q And to control those two things are very, very
24 important. One is medication and the other is
25 counseling, some sort of meeting, as you talked about, on

1 a regular basis with someone to talk with him?

2 A Among other things that would be helpful, those
3 certainly would be too, sir.

4 Q Would be what?

5 A Among the things that would be helpful in
6 controlling his behavior, those would be two things out
7 of a number of things that would be helpful.

8 Q All right. But those two are -- are very important
9 of controlling this?

10 A Yes, sir. I just would have to say that it may be
11 that those two alone wouldn't be enough, but they
12 certainly are important in the context of some other
13 things as well.

14 Q And a third would be his willing participation in
15 taking his medication, and participating in the
16 counseling? That would also be I think you said
17 essential?

18 A No, sir, actually I didn't say that, because Jeff
19 Motts like other -- many other trauma victims, has a
20 history of going away from counseling and medication,
21 refusing to have counseling and medication, and then
22 going back to it. It's an unfortunate thing we find
23 among trauma victims who, as I said, try to avoid
24 thinking about and talking about what they sometimes need
25 to think about and talk about sometimes, and who

1 sometimes try to avoid the side effects of medication and
2 then find out they have to come back and tolerate the
3 side effects of that medication. So I just -- I'm aware,
4 sir, that he has a history of going back and forth with
5 those two things, medication and counseling, moving away
6 from them and then coming back to them.

7 Q But for us, or for anyone to help him control all of
8 these emotional problems that have led to his antisocial
9 behavior, he's going to have to willingly participate in
10 taking medication, and counseling, and any other things
11 that are part of his treatment plan, correct? Just yes
12 or no and then you can explain it.

13 A No, sir, I wouldn't agree with that.

14 Q Okay.

15 A The reason I wouldn't agree with it, sir, is he went
16 a number of years in prison where -- you know, I'm not
17 saying his behavior was perfect or anything like that,
18 but it wasn't until this murder of Chuck Martin, under
19 the conditions that it occurred came about, and the
20 threats that were being made toward him by any number of
21 people that were described to me, would leave me to feel
22 that if there were times that Jeff Motts backed away from
23 counseling and medication, though we wish he wouldn't,
24 but if there are times when he would as a -- as a trauma
25 victim, as they do, then perhaps a very important

1 ingredient in the control would be, you know, if he's
2 experiencing high stress because of a specific situation
3 in the way people are behaving then perhaps that would be
4 a time to -- you would know more about this than I, sir,
5 but intervene, or perhaps one might want to pay attention
6 in regard to piling more and more stress upon him.

7 Because medication and counseling, sir, will just handle
8 so much. If you put so much stress on someone sometimes
9 it's best to reduce the stress as they had done in prison
10 a number of times before, and then things got better.

11 Q All right. Then let me ask it another way. Prison
12 is a stressful environment, you agree with that?

13 A I would. I have not been there, but I would think
14 so in my studies, yes, sir.

15 Q Your studies would indicate prison is a stressful
16 environment, and we have an individual who reacts very
17 negatively to stress?

18 A I would differ from that, if I might, sir. Was that
19 a question, I'm sorry?

20 Q Would you differ that Jeffrey Motts reacts
21 negatively to stress? I thought that's what you were
22 just saying, that when he gets under stress that's what
23 precipitated the murder of Charles Martin?

24 A Yes, sir, I would disagree with when he gets
25 under stress that that leads him to murder. When he's

1 gotten -- when Jeff Motts has gotten into stress before
2 in this prison the stress has been such that by him
3 asking for help he has had help in reducing stress and
4 things go on. It was the level of -- of stress that was
5 going on at this time and his growing anxiety and trauma,
6 which he feels he tried to report and get help for, that
7 could well have led to this. I guess I'm trying to
8 differentiate, sir, between regular old stress that we
9 have, stress that I would think many prisoners have, and
10 a level of stress that might be intolerable to any of us,
11 but in particular to someone with, as you put it, these
12 emotional difficulties, that he -- that he didn't get
13 extracted from. As it was described to me by Jonathan
14 Doctor, I mean, there are any number of people
15 threatening his life. It wasn't even just one person.

16 Q Well, let's -- let me go back then, maybe I'll ask
17 it another way. Is -- if the circumstances, similar
18 circumstances were recreated in the future that came to
19 bear upon Jeffrey Motts, would he react, or could he
20 react in the same way that he reacted with Chuck Martin?

21 A I don't believe so for two reasons, sir.

22 Q Okay.

23 A I think that Jeff Motts, from what I have been
24 reading about and talking with the counselor about, and
25 observing myself, has -- has strong feelings about what

1 he has done and is learning communication more
2 effectively. I think he's likely to be able to
3 communicate about the number of people who are
4 threatening him. I think that's one difference. And
5 very humbly I would suggest, sir, that it may be that the
6 institution might not want to leave someone with trauma
7 and anxiety in such a threatening situation by so many
8 people for a period of days. So I think there are two
9 entities that may have, if I may say, learned a lesson by
10 this terrible event.

11 MR. ARIAIL: Okay. Thank you.

12 THE WITNESS: Thank you, sir.

13 MR. SCALZO: I don't have any redirect, Your Honor.

14 THE COURT: Thank you, ma'am. You may come down.

15 THE WITNESS: Thank you, Your Honor.

16 THE COURT: Okay.

17 MR. SCALZO: I'll move this.

18 THE COURT: All right. It's ---

19 MR. HENRY: Can we approach?

20 THE COURT: Take a break.

21 MR. HENRY: Take a break, that's fine.

22 THE COURT: Do you want to take break or approach?

23 Let me ask you a question real quick at the bench.

24 (A bench conference was held.)

25 THE COURT: Again, I don't like to do these. You

1 STATE OF SOUTH CAROLINA)
2 COUNTY OF GREENVILLE) IN THE COURT OF GENERAL SESSIONS

3
4 THE STATE)
5 -vs-) TRANSCRIPT OF RECORD
6 DAVID WENDELL EDENS,) 2005-GS-23-3879
7 JENNIFER ANNETHE) 2005-GS-23-3880
8 HOLLOWAY,) JUNE 26, 2006
9) Greenville, South Carolina

10 Defendants.

11 B E F O R E :

12 THE HONORABLE JOHN C. HAYES, III, JUDGE. ; and a jury.

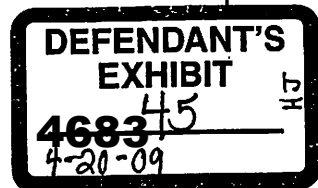
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15 A P P E A R A N C E S :

16 ROBERT AIRAIL, SOLICITOR
17 BETTY STROM, DEPUTY SOLICITOR
18 WALTER WILKINS, ESQUIRE
Attorneys for the State

19 JOHN MAULDIN, PUBLIC DEFENDER
20 RICH VIETH, ESQUIRE
Attorneys for Defendant Edens

21 WILLIAM EHLIES, ESQUIRE
22 TERESA NORRIS, ESQUIRE
Attorneys for Defendant Holloway

23
24 Michael R. Watts
25 Circuit Court Reporter



1 (PROCEEDINGS, JUNE 26, 2006)

2 DR. MARTHA LORING, having been first duly sworn,
3 testified as follows:

4 THE CLERK: State your name for the record,
5 please.

6 THE WITNESS: Dr. Marti Loring, L-O-R-I-N-G.

7 THE CLERK: Thank you. Be seated.

8 THE WITNESS: Thank you.

9 DIRECT EXAMINATION BY MS. NORRIS:

10 Q. Dr. Loring, could you please state your full name for
11 the record?

12 A. Dr. Marti Loring.

13 Q. Could you tell us your education and training?

14 A. I got my undergraduate degree at Vassar College up in
15 Poughkeepsie, New York, where I majored in psychology.

16 Then I went on to get my graduate degree in social
17 work, a Master of Social Science, at Bridmore Graduate
18 School outside of Philadelphia, Pennsylvania.

19 Then I moved down -- was in Atlanta for a number of
20 years practicing and went back to Emory University there in
21 Atlanta and got my Doctorate in Sociology, with a major in
22 Social Psychology.

23 Q. And how many years have you practiced in social work?

24 A. Let's see. About 38 years.

25 Q. And could you just summarize for us your professional

1 background in that time period?

2 A. Well, I started out doing therapy with individuals. I
3 worked at a place called Family Service in Memphis,
4 Tennessee, right after graduate school from social school of
5 school, where I worked with children, couples, and families.

6 And then I came on to Atlanta and worked in a number of
7 settings. I worked, for example, at a battered women's
8 shelter. And I worked in an agency that specialized in
9 doing counseling with those who battered and those who were
10 the victims, those who were the children, the whole family.

11 Then I went on to be on the faculty of Emory Medical
12 School in Atlanta. I was on the clinical faculty of
13 psychiatry, where I worked in a large city hospital, called
14 Grady, in the psychiatry department, seeing individuals,
15 helping them do group therapy and training doctors and
16 nurses and other social workers.

17 Then I went on to become director of the Center for
18 Mental Health & Human Development, where I still am today as
19 the director there in Atlanta. It's an agency where you
20 focus on evaluations, training of individuals across the
21 country, and being available for service when there is some
22 need for us to help in Atlanta, or in other areas of the
23 country, and doing research as well.

24 Q. Does your research have any particular focus or
25 specialty?

1 A. Yes, ma'am, it does.

2 Q. Okay. What is it?

3 A. Primarily abuse and trauma in areas related to those
4 two.

5 Q. And have you published in professional journals or
6 other publications of your work?

7 A. Yes, ma'am, I have.

8 Q. Can you just summarize for us the nature of those?

9 A. Yes, ma'am. With the help of students who were very
10 helpful and caring in the work, I had the opportunity to
11 publish two books, to have two books published. One is
12 called Emotional Abuse, which looks at emotional and other
13 types of abuse and trauma.

14 And the other is called -- about emotional abuse again,
15 case studies, Stories From the Heart.

16 That's an area of books that I have written a couple of
17 chapters in books dealing with leadership and trauma.

18 And then a number of professional articles. Several.
19 And a number of them have to do with when trauma frequently
20 occurs, like during the holidays, ways to treat trauma or
21 help people with it. What groups are particularly
22 vulnerable to abuse and trauma and how does it affect them.

23 An article about abused women and different types of
24 abuse that they may experience. For example, two articles
25 about that, published in professional journals.

1 Q. Are you professionally licensed?

2 A. Yes, ma'am.

3 Q. And what is your license and where?

4 A. It's called an LCSW, Licensed Clinical Social Worker.
5 It's in Georgia.

6 Q. Have you testified as an expert in social work
7 previously?

8 A. Yes, ma'am.

9 Q. Have you testified as an expert in trauma and abuse
10 previously?

11 A. Yes, ma'am.

12 MS. NORRIS: Your Honor, we would offer Dr. Loring
13 as an expert in social history analysis and assessment and
14 trauma and abuse.

15 THE COURT: Any voir dire by the State?

16 MR. AIRAIL: I'm sorry, I don't think I heard the
17 whole -- I didn't understand what the offering was.

18 MS. NORRIS: Social history analysis and
19 assessment, and as an expert in trauma and abuse analysis.

20 MR. AIRAIL: No voir dire.

21 MR. MAULDIN: None.

22 THE COURT: I find she is qualified.

23 * * * * *

24 (END OF REQUESTED TRANSCRIPT OF RECORD)

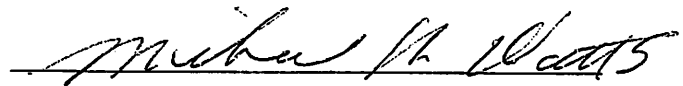
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CERTIFICATE

I, the undersigned, Michael R. Watts, Official Court Reporter for the Sixteenth Judicial Circuit of the State of South Carolina, do hereby certify that the foregoing is a true, accurate and complete Transcript of Record of the partially requested proceedings had and the evidence introduced in the trial of the captioned case in the Court of General Sessions for GREENVILLE County, South Carolina, on the 26th day of June, 2006.

I do further certify that I am neither of kin, counsel nor interest to any party hereto.

November 24, 2008



Michael R. Watts
Circuit Court Reporter



South Carolina
Department of Labor, Licensing and Regulation



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Mark Sanford
Governor

Adrienne Riggins Youmans
Director

Division of Legal Services
Office of General Counsel

April 16, 2009

Everette P. Godfrey, Jr.
Godfrey Law Firm, LLC
10 East Avenue
Greenville, SC 29601

Re: License requirements for expert testimony

Dear Mr. Godfrey:

The South Carolina Department of Labor, Licensing and Regulation provides administrative and investigative services to more than forty professional and occupational licensing programs. S.C. Code 40-1-50(A). The Department investigates allegations of unlicensed practice under the authority of S.C. Code 40-1-80(A). Where appropriate, the Department institutes criminal or civil proceedings for unlicensed practice under the authority of S.C. Code 40-1-200 and 210.

The South Carolina Department of Labor, Licensing and Regulation does not pursue either criminal or civil sanctions against individuals who testify as experts in the courts of this state, even when those individuals are not licensed in South Carolina. On two occasions the South Carolina Supreme Court considered statutes that appeared to require state licensure as a condition to giving expert testimony in the courts of this state. In each case, the Court ruled that the statute could not be used to prevent out-of-state experts from testifying in South Carolina Courts. Baggerly v. CSX Transportation, Inc., 370 S.C. 362, 635 S.E.2d 97 (2006); Re: Act No. 385 of 2006 [No Number in original], Supreme Court of South Carolina, August 24, 2006.

These decisions appear to be based upon the doctrine of separation of powers and to hold that the decision of the court to allow or disallow a particular expert witness cannot be limited by legislation. Because the Department of Labor, Licensing and Regulation cannot distinguish the legislative action in the Social Work Practice Act from that in the Engineering and Medical Practice Acts, the Department does not seek to prevent an out-of-state social worker from giving expert testimony, if qualified by the rules of the court, despite not being licensed in South Carolina.

With kindest regards, I am

Very truly yours,

Sharon A. Dantzler
Deputy General Counsel

SAD:osm

