STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to the Court of Appeals
Appeal from Dorchester County
Maite Murphy, Circuit Court Judge

Opinion No. 5863 (S.C. Ct. App. filed Oct. 6, 2021)

2016-GS-18-1605

THE STATE,

RESPONDENT,

V.

TRAVIS LATRELL LAWRENCE,

PETITIONER.

APPELLATE CASE NO. 2018-000989

PETITION FOR WRIT OF CERTIORARI TO THE COURT OF APPEALS

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CERTIFICATE OF COUNSEL

Counsel for Petitioner certifies that the petition for rehearing was made and finally ruled on by the Court of Appeals on November 18, 2021. App. 28.

QUESTION PRESENTED

Did the Court of Appeals err in holding the hazards of self-incrimination were openly apparent for a witness whose proposed testimony was that he and Petitioner went to a home to purchase marijuana, but never completed the purchase, and that he and Petitioner exercised self-defense when the homeowner attacked Petitioner?

STATEMENT OF THE CASE

On July 2, 2016, Clayton Baxter lived with a friend in a townhouse. R. 12, l. 18 – R. 13, l. 4. At some point that day, Baxter received a telephone call from Terell Bennett allegedly asking to borrow some money. R. 15, ll. 5-19; R. 35, l. 24 – R. 36, l. 2. Baxter helped raise Bennett and considered Bennett his nephew. R. 15, ll. 11-17; R. 35, ll. 19-23. Accordingly, Baxter immediately agreed to loan Bennett money, and he encouraged Bennett to stop by his home soon to pick up the money. R. 15, ll. 20-22; R. 36, ll. 3-9. Later, Bennett called Baxter to let him know that he was outside. R. 17, ll. 5-7. Baxter then opened the door for Bennett. R. 17, ll. 10-11. According to Baxter, Bennett arrived in a gold Cadillac DeVille. R. 16, ll. 23-24.

Baxter claimed that as Bennett was entering the townhome, Baxter was "looking between his legs" and saw "a set of feet walking behind him, slow." R. 17, ll. 13-14. Baxter asked Bennett who was behind him. R. 17, ll. 14-15. Instead of answering, Bennett moved to the right. R. 17, l. 16. Baxter claimed he then saw Petitioner holding a .38 revolver on him. R. 17, ll. 16-19; R. 19, ll. 7-10. Baxter was familiar with Petitioner because he had met him several times through Bennett. R. 18, ll. 2-10. He claimed the two men never had any problems with each other. R. 18, ll. 11-13. Nevertheless, Baxter alleged Petitioner held a gun on him and demanded money. R. 19, ll. 18-22.

Baxter waited "for them to make one mistake" so he could "capitalize on it." R. 20, ll. 2-7. According to Baxter, Petitioner made this mistake when he put the gun down as he tried to go through Baxter's pockets. R. 20, ll. 7-9. Seizing this opportunity, Baxter, who was six feet and seven inches tall, picked up Petitioner and slammed him on top of the table. R. 20, ll. 9-10; R. 53, ll. 10-13; R. 182, ll. 17-19. Thereafter, according to Baxter, the three men struggled. R. 20, ll. 15-18. While Baxter's finger was on the trigger of the gun, the gun fired. R. 20, l. 23 – R. 21,

l. 5. Baxter claimed Petitioner then got out from underneath him and went into the kitchen. R. 21, ll. 23-24. Baxter could not explain how Petitioner, who was less than six feet tall and weighed significantly less than Baxter's three hundred pounds, managed to get out from under him during this struggle for the gun. R. 53, l. 25 – R. 54, l. 2; R. 182, ll. 22-23. Nevertheless, Baxter claimed Petitioner retrieved a knife from the kitchen and stabbed him with it. R. 21, l. 24 – R. 23, l. 1.[1] According to Baxter, Petitioner told him to let Bennett go, and Baxter did so. R. 23, ll. 1-4. Bennett and Petitioner then left with seventy dollars. R. 24, ll. 5-11.[2]

On February 2, 2017, a Dorchester County grand jury indicted Petitioner for attempted murder (2016-GS-18-1605). R. 240-241. Additionally, Petitioner was indicted for armed robbery and possession of a firearm by persons unlawful. R. 2, ll. 7-11. The state, represented by Ryan Templeton and Mike Spears, called the case to trial before the Honorable Maite Murphy and a jury on May 21-23, 2018. R. 1. Michelle Williams and John Loy represented Petitioner. R. 1.

During the trial, Baxter admitted he smoked marijuana and had some marijuana and a digital scale in his home on July 2, 2016. R. 16, ll. 5-8; R. 50, ll. 11-12; R. 51, ll. 6-12; R. 89, ll. 16-19. However, he claimed that Petitioner and Bennett were not at his home to purchase drugs that day. R. 50, ll. 9-10. When questioned about his prior record, Baxter admitted only to having a prior conviction for possession of marijuana. R. 52, ll. 9-14. He was forced to admit he

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[1] When the police officers arrived, Clayton Baxter told one of the officers that Terell Bennett stabbed him. Defendant's Exhibit #9. During the trial, Baxter repeatedly claimed he never said Bennett stabbed him, but the officer's body cam video showed Baxter told the first responding officer that Bennett "did it" and Petitioner was just there with Bennett. Cf. R. 38, ll. 18-24 with Defendant's Exhibit #9; see also R. 39, ll. 1-9; R. 44, l. 8 – R. 45, l. 7; R. 46, ll. 4-8.

[2] Baxter had over $600 in his home that was not stolen. R. 49, ll. 12-21; R. 89, ll. 14-15; Defendant's Exhibit #3; Defendant's Exhibit #5. This money was "in a whole bunch of different denominations, hundreds, twenties, tens, ones." R. 50, ll. 1-5; Defendant's Exhibit #3; Defendant's Exhibit #5.

was actually convicted of possession with intent to distribute marijuana. R. 51, l. 18 – R. 52, l. 3. Baxter also claimed that he never used any other drugs. R. 52, l. 16 – R. 53, l. 2. Yet, he was convicted of possession of cocaine, and the state was forced to admit this fact through a stipulation. R. 71, l. 15 – R. 72, l. 21; R. 237.

During the deliberations, the jurors asked if the "hand of one, hand of all applied to all of the charges." R. 228, ll. 1-3; R. 236. Judge Murphy, with the consent of the parties, informed the jurors that the accomplice liability instruction applied only to attempted murder and armed robbery. R. 228, ll. 4-6; R. 236. After deliberating for approximately one and a half hours, the jury indicated it was deadlocked. R. 227, ll. 11-16; R. 238.[3] Judge Murphy then instructed the jurors pursuant to Allen v. United States, 164 U.S. 492 (1896). R. 228, l. 18 – R. 230, l. 9. Approximately thirty minutes later, the jurors requested the definition of malice aforethought. R. 230, ll. 20-22; R. 239. Thereafter, Judge Murphy read the attempted murder instruction to the jury again. R. 231, l. 8 – R. 232, l. 3. Thirty minutes later, the jury returned with its verdict, finding Petitioner guilty of attempted murder, but not guilty of armed robbery or possession of the weapon. R. 233, l. 23 – R. 234, l. 10. Judge Murphy sentenced Petitioner to thirty years imprisonment. R. 235, ll. 10-12; R. 242.

On May 24, 2018, Petitioner served his notice of appeal. On appeal, Petitioner challenged the trial court's erroneous admission of prior bad act evidence concerning Petitioner's co-defendant who was not on trial and the trial court's decision to allow the co-defendant to invoke the Fifth Amendment preventing Petitioner from presenting favorable evidence. Without the benefit of oral argument, the Court of Appeals affirmed in a published opinion. State v. Lawrence, Op. No. 5863 (S.C. Ct. App. filed Oct. 6, 2021) (Howard Adv. Sh. No. 35 at 20);

[3] The jury's note indicated it was deadlocked on charge of attempted murder with seven jurors voting for guilty and five voting for not guilty. R. 238.

App. 1-7. The Court of Appeals agreed with Petitioner that the trial judge erroneously admitted evidence of prior bad acts, but the Court held the error was harmless. State v. Lawrence, Op. No. 5863 (S.C. Ct. App. filed Oct. 6, 2021) (Howard Adv. Sh. No. 35 at 20); App. 1-7. Further, the Court agreed with the trial judge that the co-defendant's proposed testimony was self-incriminating such that the co-defendant could invoke his right to silence. State v. Lawrence, Op. No. 5863 (S.C. Ct. App. filed Oct. 6, 2021) (Howard Adv. Sh. No. 35 at 20); App. 1-7. On October 21, 2021, Petitioner and the state filed petitions for rehearing. App. 8-27. On November 18, 2021, the Court of Appeals denied the petitions. App. 28. This petition for writ of certiorari follows.

ARGUMENT

The Court of Appeals erred in holding the hazards of self-incrimination were openly apparent for a witness whose proposed testimony was that he and Petitioner went to a home to purchase marijuana, but never completed the purchase, and that he and Petitioner exercised self-defense when the homeowner attacked Petitioner.

Reasons to grant certiorari

This Court should grant certiorari to review the decision issued by the Court of Appeals because it conflicts with prior decisions of this Court and the United States Supreme Court. See Rule 242(b)(3), SCACR; Rule 242(b)(5), SCACR. Furthermore, the case presents substantial constitutional issues, including the scope of the Fifth Amendment privilege against self-incrimination and the Sixth Amendment right to present a defense. See Rule 242(b)(4), SCACR. The Court of Appeals held that a witness may invoke the privileges of the Fifth Amendment even where the answers would not incriminate the witness. Here, the witness claimed (1) he and Petitioner went to a home to purchase marijuana, but they did not make any purchase, and (2) he and Petitioner exercised self-defense. Those answers did not expose the witness to criminal liability. The erroneous decision to allow the witness to invoke the privilege against self-incrimination denied Petitioner the opportunity to present a defense.

Relevant facts

Petitioner wanted to call Terell Bennett, as a witness. R. 127, ll. 7-9. However, Bennett indicated he wanted to invoke his right to silence. R. 128, ll. 4-8; R. 135, ll. 17-19. Therefore, Judge Murphy held an *in camera* hearing to determine whether Bennett could invoke his right to silence – whether the proposed testimony would be incriminating. R. 127, ll. 18-25; R. 129, ll. 1-6; R. 135, ll. 23-24; R. 136, ll. 9-12.

The solicitor met with Bennett twice prior to Petitioner's trial. R. 148, ll. 1-10; R. 152, l. 25 – R. 153, l. 12. Eric Melendez, the solicitor's investigator, was present for these meetings. R. 146, ll. 20-24. These meetings were not memorialized. R. 147, ll. 19-21. While the first meeting was considered unproductive by the state's investigator, the second meeting bore greater fruit. R. 148, ll. 6-21; R. 149, l. 4 – R. 150, l. 20. When defense counsel learned about these meetings from Bennett's counsel, counsel contacted the solicitor. R. 153, l. 23 – R. 154, l. 16; R. 156, ll. 6-8. The solicitor informed counsel that he had not taken any notes during the meetings. R. 154, ll. 18-21. After learning from Bennett's counsel that Melendez was present for the meetings, defense counsel contacted the investigator prior to the trial. R. 155, ll. 3-8. What occurred during this contact was disputed as demonstrated by defense counsel's questioning of the investigator during an *in camera* hearing. Most importantly, the investigator denied telling defense counsel that Bennett stated that Baxter rushed or lunged at Petitioner. R. 151, ll. 5-17. The investigator also did not recall telling defense counsel that Bennett's statement indicated Petitioner acted in self-defense. R. 151, l. 22 – R. 152, l. 16.

Outside the presence of counsel, Judge Murphy questioned Bennett. Bennett explained that he spoke with the solicitor shortly before Petitioner's case was called to trial. R. 136, l. 23 – R. 139, l. 17. The judge asked Bennett to tell her what he told the solicitor during that meeting. R. 139, ll. 18-21. Bennett told "the truth of what happened," including that he was "being held against [his] will and falsely accused." R. 139, ll. 22-25. When Bennett and Petitioner went to Baxter's home, Baxter attacked them. R. 139, l. 25 – R. 140, l. 1. Bennett and Petitioner went to Baxter's home to buy marijuana. R. 140, ll. 1-2. Bennett believed Petitioner and Baxter had a "history." R. 140, ll. 2-3. As soon as Bennett and Petitioner went into Baxter's house, Baxter

"attacked [Petitioner] first." R. 140, ll. 8-9. As soon as Baxter saw Petitioner, "his whole demeanor just flip out of nowhere like he was frustrated." R. 140, ll. 17-20.

Bennett's counsel admitted Bennett's testimony would "provide or bolster" a self-defense case for Petitioner. R. 143, ll. 6-8. Further, she admitted that she would "probably call" Bennett to testify in his defense at his trial. R. 145, ll. 2-8. However, she argued Bennett would be asked to give information "that could potentially be used against him." R. 143, ll. 8-10.

Judge Murphy indicated that Bennett's statement that he was going to Baxter's home to buy marijuana would implicate him in a crime. R. 141, ll. 1-5. She also indicated that Bennett was "putting [himself] at the scene of this alleged crime." R. 141, ll. 11-14. Nevertheless, she agreed that Bennett's testimony showed his actions and Petitioner's actions were in self-defense. R. 141, ll. 15-20. Judge Murphy found Bennett's answers to the questions she posed "would be indicative that would establish a hazard of incrimination for him." R. 159, ll. 2-5. She further held "his silence [was] certainly justified in this matter" because "if he were allowed to testify, that he would incriminate himself." R. 159, ll. 5-8. She concluded that even if "those specific single questions may not be overtly incriminating" they "would be incriminating through any further confessional proof." R. 159, ll. 8-11. Thus, she permitted Bennett to assert his Fifth Amendment right to silence *in toto* and prohibited Petitioner from calling him as a witness. R. 159, ll. 11-13.

The Court of Appeals affirmed Judge Murphy's determination. With no details, the Court concluded "[t]he hazard of incrimination was openly apparent." State v. Lawrence, Op. No. 5863 (S.C. Ct. App. filed Oct. 6, 2021). Further, the Court held "Bennett was not facing just a risk of prosecution; he was already being prosecuted as [Petitioner]'s indicted co-defendant." Id. Boldly, the Court declared, "Almost anything Bennett could utter about the incident would

likely be used against him at his upcoming trial." Id. Although the Court recognized that "Bennett's proposed testimony was at odds with what the State was contending was the truth," which implicitly acknowledged that Bennett's testimony would have supported Petitioner's claim of self-defense, the Court appeared to reason that this fact supported a finding that Bennett's testimony was self-incriminating. This is simply not the test.

Discussion

No person "shall be compelled in any criminal case to be a witness against himself." U.S. Const. amend V.[4] "The essence of this basic constitutional principle is the requirement that the state which proposes to convict and punish an individual produce the evidence against him by the independent labor of its officers, not by the simple, cruel expedient of forcing it from his own lips." Estelle v. Smith, 451 U.S. 454, 462 (1981); see also Kastigar v. United States, 406 U.S. 441, 444 (1972) (explaining the privilege "reflects a complex of our fundamental values and aspirations, and marks an important advance in the development of our liberty"). The privilege is "accorded liberal construction in favor of the right it was intended to secure," and may be claimed when a witness "has reasonable cause to apprehend danger from a direct answer." Hoffman v. United States, 341 U.S. 479, 486 (1951). "The settled law provides that the privilege extends not only to answers that would themselves support a criminal conviction, but also to answers furnishing a link in the chain of evidence needed to prosecute an individual." Grosshuesch v. Cramer, 377 S.C. 12, 659 S.E.2d 112 (2008) (citing Hoffman, 341 U.S. at 486); see also Maness v. Mayers, 419 U.S. 449, 461 (1975); United States v. Pardo, 636 F.2d 535, 544 (D.C. Cir. 1980) (explaining that "a witness does not lose his Fifth Amendment right to refuse to

[4] The South Carolina Constitution also provides for protection against compelled self-incrimination. S.C. Const. art. I, § 12.

testify concerning other matters or transactions not included in his conviction or plea arrangement").

"The privilege against self-incrimination, one of our most cherished fundamental rights, is jealously guarded by the courts." North River Ins. Co., Inc. v. Stefanou, 831 F.2d 484, 486 (4th Cir. 1987). Examining the validity of the assertion of the privilege, the Sixth Circuit held a valid assertion "exists where a witness has reasonable cause to apprehend a real danger of incrimination." In re Morganroth, 718 F.2d 161, 167 (6th Cir. 1983). "While the privilege is to be accorded liberal application, the court *may* order a witness to answer if it *clearly* appears that he is mistaken as to the justification for the privilege in advancing his claim as a subterfuge." Id. (emphasis added).

For a court to "overrule the claim of privilege, it must be [p]erfectly clear from a careful consideration of all the circumstances, that the witness is mistaken in the apprehension of self-incrimination and the answers demanded [c]annot possibly have such tendency." Commonwealth v. Carrera, 227 A.2d 627, 629 (Pa. 1967). "[I]f the witness, upon interposing his claim, were required to prove the hazard [of self-incrimination] in the sense in which a claim is usually required to be established in court, he would be compelled to surrender the very protection which the privilege is designed to guarantee." Hoffman, 341 U.S. at 486.

According to the South Carolina Supreme Court, "[i]n determining whether the information is incriminating," there are "at least two categories of potentially incriminating questions." Grosshuesch, 377 S.C. at 23, 659 S.E.2d at 117. "First, there are questions whose incriminating nature is evident on the questions' face in light of the question asked and the surrounding circumstances." Id. at 23, 659 S.E.2d at 117-118. "Second, there are questions which though not overtly incriminating, can be shown to be incriminating through further

contextual proof." Id. at 23, 659 S.E.2d at 118. A court must answer "whether there is a reasonable possibility that requiring a party to answer a certain question would provide information that could be used against the party in a criminal proceeding or would lead to the discovery of such information." Id. at 24, 659 S.E.2d at 118. "[T]he guiding principle in a self-incrimination inquiry is the objective reasonableness of a witness's claimed fear of future prosecution." Id. at 26, 659 S.E.2d at 119.

Presence at the scene of a crime

In ruling that Bennett could invoke his right against self-incrimination and refuse to testify, Judge Murphy determined that Bennett was exposing himself to criminal liability by admitting his presence at the scene of a crime. As an initial matter, Bennett did not admit to being present at the scene of a crime. Bennett admitted to being present when Petitioner acted in self-defense against Baxter's unprovoked attack. As Bennett explained, Baxter attacked and Petitioner acted in self-defense. Additionally, merely being present at the scene of a crime is not incriminating – even under an accomplice liability theory. State v. Johnson, 291 S.C. 127, 129, 352 S.E.2d 480, 482 (1987). "'Mere presence at the scene is not sufficient to establish guilt as an aider or abettor.'" State v. Mattison, 388 S.C. 469, 480, 697 S.E.2d 578, 584 (2010) (quoting State v. Leonard, 292 S.C. 133, 137, 355 S.E.2d 270, 272 (1987)). The trial judge erred in finding Bennett's mere presence at the scene of a crime was self-incriminating. Further, according to Bennett, there was no crime. While Bennett did not provide many details, he was clear that Baxter attacked Petitioner and that Petitioner acted in self-defense. Thus, there was no crime for which Bennett was present as Petitioner's conduct was justified as self-defense.

Attempting to purchase marijuana

Likewise, Judge Murphy's determination that Bennett's testimony that he went to Baxter's residence to purchase marijuana exposed him to criminal liability was legal error. Bennett did not admit to buying or possessing marijuana; thus, the only consideration left is whether his testimony incriminating him in attempting to purchase marijuana in violation of section 44-53-370 of the South Carolina Code. Under South Carolina law, it is unlawful for a person to attempt to purchase a controlled substance. S.C. Code Ann. § 44-53-370(a)(1).

"Generally, the mens rea of an attempt crime is one of specific intent such that the act constituting the attempt must be done with the intent to commit that particular crime." State v. Reid, 383 S.C. 285, 292, 679 S.E.2d 194, 198 (Ct. App. 2009) (citing State v. Sutton, 340 S.C. 393, 397, 532 S.E.2d 283, 285 (2000)). "'In the context of an attempt crime, specific intent means that the defendant consciously intended the completion of acts comprising the choate offense.'" Id. (quoting State v. Nesbitt, 346 S.C. 226, 231, 550 S.E.2d 864, 866 (Ct. App. 2001)). Additionally, "the defendant's specific intent" must be "accompanied by some overt act, beyond mere preparation, in furtherance of the intent." Id.

In Reid, this Court discussed how "[c]ourts have struggled to determine the point at which conduct moves beyond the preparatory stage to the perpetration stage." Id. at 293, 679 S.E.2d at 198. Further, this Court explained that "[c]ases in South Carolina do not clearly establish any absolute guiding test for our trial courts to employ in resolution of this issue." Id. After discussing other tests used by other courts, this Court looked to *dicta* from the South Carolina Supreme Court in State v. Quick, 199 S.C. 256, 259-260, 19 S.E.2d 101, 102-103 (1942). Id. at 296, 679 S.E.2d at 199. This Court relied upon the Supreme Court's notation that "'preparation consists in devising or arranging the means or measures necessary for the commission of the crime; the attempt or overt act is the direct movement toward the commission,

after the preparations are made.'" Id. (quoting Quick, 199 S.C. at 260, 19 S.E.2d at 103). Further, the Supreme Court, as explained by this Court, "went on to articulate 'the act' is to be liberally construed, and in numerous cases it is said to be sufficient that the act go far enough toward accomplishment of the crime to amount to the commencement of its consummation." Id. (quoting Quick, 199 S.C. at 259, 19 S.E.2d at 102). Finally, this Court noted that according to the Supreme Court, "'the act need not be the last proximate step leading to the consummation of the offense.'" Id. (quoting Quick, 199 S.C. at 259, 19 S.E.2d at 102).

According to this Court, "no definite rule as to what constitutes an overt act for attempt purposes can safely be laid down and each case is dependent upon its particular facts and the inferences which the jury may reasonably draw therefrom." Id. at 298, 679 S.E.2d at 200. The only way to construe the trial court's and Court of Appeals' rulings on this aspect is that Bennett went to Baxter's house to buy marijuana. There was no evidence from his testimony that he acted in any way in furtherance of that act. At most, his testimony indicated that his purpose in going to Baxter's house was to purchase marijuana, but that is far cry from an overt act. Perhaps going to Baxter's home could be preparation as it may be "arranging the means or measures necessary" to purchase the marijuana, but it was not a direct movement toward the commission of a crime. In light of Baxter's testimony that he did not sell drugs and the officer's testimony that less than one ounce of marijuana was found in Baxter's residence, there seems to have been no pre-arrangement made by Bennett in hopes of buying marijuana from Baxter – there was none to buy and he did not sell it.

The trial judge erred in finding Bennett's testimony would expose him to criminal liability. Furthermore, the Court of Appeals erred in affirming the trial judge's finding in this regard. The Court of Appeals relied too heavily upon the fact that Bennett had been charged as a

co-defendant to determine that "[a]lmost anything Bennett could utter about the incident would likely be used against him at his upcoming trial." If the decision of the Court of Appeals stands, prosecutors will simply initiate criminal charges against any witness favorable to the defense as a way to prevent the witness from testifying. Here, Bennett's testimony was limited to his admission that he went to Baxter's house to purchase marijuana, but did not complete the purchase, and his admission that he and Petitioner exercised self-defense when Baxter attacked Petitioner. Thinking about purchasing marijuana is not a crime. Exercising self-defense is not a crime. The simple fact that the prosecutor charged Bennett with criminal offenses could not allow Bennett to invoke blanket protection of the Fifth Amendment. Furthermore, the existence of the pending criminal charges could not shield the trial judge's ruling on his right to invoke the Fifth Amendment from appellate review as the Court of Appeals appeared to hold. This Court should grant certiorari to address the substantial constitutional issues involved and to rectify the conflict between the Court of Appeals' decision and decisions of this Court and the United States Supreme Court.

CONCLUSION

Petitioner respectfully requests this Court grant the petition for writ of certiorari and order fully briefing.

Respectfully Submitted,

Susan B. Hackett

Susan B. Hackett
Appellate Defender

ATTORNEY FOR PETITIONER

This 20th day of December, 2021.

STATE OF SOUTH CAROLINA

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CERTIFICATE OF SERVICE

Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the a copy of the Petition for Writ of Certiorari and Appendix in this case has been served on William M. Blitch, Jr., Esquire, at the primary e-mail address listed in the Attorney Information System (AIS), which is, wblitch@scag.gov; and Travis Latrell Lawrence, #342217, at Lee Correctional Institution, 990 Wisacky Hwy., Bishopville, SC 29010; and the Court of Appeals, at 1220 Senate Street, Columbia, SC 29201, this 20th day of December, 2021.

Susan B. Hackett

Susan B. Hackett
Appellate Defender

ATTORNEY FOR PETITIONER