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SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Certiorari to Lexington County

Honorable Eugene C. Griffith, Circuit Court Judge

Opinion No. 2022-UP-186

WILLIAM BRUCE JUSTICE,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2017-001718

PETITION FOR REHEARING

Pursuant to Rule 221(a), SCACR, William Bruce Justice requests that this Court grant rehearing based on the arguments set forth below.

William Justice was sentenced to four consecutive fifteen-year sentences in 1989. Despite a sixty-year aggregate sentence, the blatantly unconstitutional parole revocation procedures employed against him evaded judicial review. In concluding Justice's case is moot, this Court in the same breath suggested future parolees avail themselves of an identical process. Without either justification or explanation, this Court held that future victims of the exact same scam have a meaningful remedy, namely the same one that failed to secure relief for Justice.

Respectfully, this decision was erroneous. If Justice was unable to pursue his post-conviction relief ("PCR") appeal because he was no longer incarcerated, the indefensible, illegal parole revocation process will continue to take advantage of indigent individuals. This manifest injustice satisfies the mootness "capable of repetition, yet evading review" exception, and Justice requests rehearing.

The opinion issued by this Court is prima facie evidence of why parolees **do not** receive meaningful judicial review. Justice's case is a perfect illustration of how indigent individuals receive disparate treatment in South Carolina. This Court granted certiorari in the matter *sub judice*, yet instead of receiving appellate review of credible allegations of constitutional deprivations, complete with sworn testimony[1] that this exact situation will continue to occur, Justice's case was dismissed.

This Court's opinion that Justice's appeal was supposedly moot concluded "[w]hile we agree the issues of denial of due process rights and treatment of *pro se* individuals in a parole revocation hearing may arise again, we do not agree they will evade future judicial review." The crux of the matter, and the portion to which Justice strenuously objects, is the following:

> If in the future another inmate, who is still incarcerated, believes his parole has been unlawfully revoked and the parole board has denied him similar due process rights, that inmate may file a PCR petition, and a court will have the opportunity to rule on the issues at this time.

Justice v. State, Op. No. 2022-UP-186 (S.C. Ct. App. filed May 4, 2022) (internal citations omitted).

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[1] As stated in the Reply Brief of Petitioner, "Nikita Cook's testimony at Mr. Justice's PCR hearing is an unequivocal roadmap of why this case is capable of near-certain repetition." RBOP p. 8; see generally App. 322 – 335 (testimony of Agent Cook admitting the occurrences in Justice's case are standard operating practices).

This conclusion adopts the flawed and nearsighted position offered by the state: "Any inmate who claims they 'should not have been returned to prison' on the basis their parole has been unlawfully revoked may file a PCR action under section 17-27-20(a)(5)." Amended Brief of Respondent p. 9.

This conclusion keeps functioning the revolving door of abuse of the very same system that trampled on Justice. In a hypothetical scenario mirroring Justice's case save for the fact that an individual is still incarcerated, the inmate could file a PCR application following the glaringly improper revocation procedures that resulted in him being re-incarcerated. If his parole was revoked and the remaining sentence was less than three years, the PCR process would not allow for judicial review, as evidenced by the procedural history in the matter at bar. If the hypothetical inmate was released within three years, his case would be moot under this Court's reasoning and the timelines experienced by Justice. App. 317 ll. 5 – 12.

Justice filed his PCR application on February 26, 2014. The state's return was filed fifteen months later.[2] The PCR evidentiary hearing did not occur until *three years* after Justice's PCR application was filed. In the hypothetical situation described above, an inmate could have his parole revoked and be required to serve two-and-a-half years' incarceration. In that instance, the state would undoubtedly move to dismiss the PCR action as moot at the time of the evidentiary hearing. A published opinion is needed to curb the deliberate, intentional exploitation of indigent individuals in South Carolina and to align our state with longstanding federal laws as discussed in the Brief of Petitioner and Reply Brief of Petitioner.

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2 This significant delay far exceeded the thirty days provided by the PCR statutes but is not an uncommon timeframe for the state's response in PCR actions. S.C. Code Ann. § 17-27-70(a) ("Within thirty days after the docketing of the application ... the State shall respond by answer or by motion which may be supported by affidavits.").

Consider, in the alternative, this hypothetical individual's appeal. Assuming *arguendo*, that the individual remains incarcerated, as Justice was, following the denial of post-conviction relief. After a notice of appeal, petition for writ of certiorari, and return are filed with the South Carolina Supreme Court, the PCR appeal can be transferred to this Court. This Court could grant certiorari, direct further briefing, and schedule oral argument. If, however, the period of incarceration ends at *any point during the entire PCR appeal*, the individual's case could be dismissed for mootness based on this Court's current rationale.[3] Such a practice relegates this Court's authority to the PCR court while simultaneously forbidding meaningful appellate review of a PCR court's decision. In the event the individual is still incarcerated, the parole board could *grant parole a second time the day before oral argument*, thereby requiring dismissal based upon this Court's current rationale. This reasoning invites mischief and was the subject of a recent opinion from the Supreme Court of Minnesota:

> The Department [of Corrections] responds that the duration of the challenged activity must, "by its very nature," be too short to be fully litigated. The exception does not apply, says the Department, because the term of an offender's re-incarceration is not, "by its very nature," too short a period to litigate a habeas corpus proceeding. The Department undermines its own position. If the re-incarceration term is subject to the Department's broad discretion, then the term, "by its very nature," **could always be shortened by the Department to moot an offender's habeas corpus petition**.
>
> Based on this analysis, we hold that the issues Young raises are capable of repetition yet likely to evade review. Accordingly, we will not dismiss this appeal as moot.

State ex rel. Young v. Schnell, 956 N.W.2d 652, 663 (Minn. 2021) (emphasis added and internal citation omitted).

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[3] See Stephenson v. Campbell, No. 2:06-CV-01929-NRS, 2009 WL 426026, at *1 (E.D. Cal. Feb. 19, 2009) (dismissing as moot an inmate's appeal after parole was granted a second time); see also Robledo-Valdez v. Trani, No. 12-CV-02203-WYD, 2013 WL 3216093, at *1 (D. Colo. June 25, 2013) (same).

A parole agent, as in Justice's case, could refuse to recognize longstanding and unambiguous precedent from the Supreme Court of the United States of America and thereby egregiously violate a parolee's constitutional rights. Without appellate review, there exists no avenue to correct the PCR court's erroneous findings. Such a system breeds contempt of the law. This Court's opinion in its current form abdicates its responsibility to the PCR court, effectively forcing PCR applicants to live with the decision of a single PCR judge. Stated differently, this Court suggests that the determination made by the PCR judge is the only review necessary. Such a decision provides the South Carolina Department of Probation, Parole and Pardon Services ("SCDPPPS") carte blanche to invalidate well-established constitutional rights simply because most inmates who have had their parole revoked will likely "max out" their sentence before appellate review is complete.

Mootness: capable of repetition but evading judicial review exception

An opinion from 1895 is generally understood to be the first United States Supreme Court decision directly addressing the mootness doctrine. Mills v. Green, 159 U.S. 651 (1895). Interestingly, Mills involved the election of delegates to a convention to revise South Carolina's constitution. Id. at 652. A South Carolina citizen filed suit, claiming the state's voter registration statutes unconstitutionally "abridge[ed], imped[ed], and destroy[ed] the suffrage of citizens of the state and of the United States." Id. at 651-52. While the case was pending on appeal, the date of the delegate election for the convention passed, the delegates were selected, and the constitutional convention had assembled. Therefore, the Court held that "the whole object of the [plaintiff's lawsuit] was to secure a right to vote at the election." Id. at 657. The matter was therefore dismissed.

Since then, however, the Supreme Court has generally *declined to deem cases moot* that present issues or disputes that are "capable of repetition, yet evading review."[4] The classic example of a dispute that is capable of repetition, yet evading review is a pregnant woman's constitutional challenge to an abortion regulation. See Roe v. Wade, 410 U.S. 113, 125 (1973) (quoting S. Pac. Terminal Co. v. ICC, 219 U.S. 498, 515 (1911)). Once a woman gives birth, abortion is no longer an option for terminating that particular pregnancy. However, almost any litigation of significance—especially if it involves an appeal—can rarely be fully resolved in a mere nine months. If a challenge to an abortion regulation became moot as soon as the challenger gave birth, "pregnancy litigation seldom w[ould] survive much beyond the trial stage, and appellate review w[ould] be effectively denied." Id.

The Supreme Court has deemed certain other controversies outside of the abortion context as capable of repetition, yet evading review as well. For example, in Federal Election Commission v. Wisconsin Right to Life, Inc., an advocacy organization claimed that restrictions on "electioneering communications" established by the Campaign Reform Act of 2002 unconstitutionally prohibited the organization from broadcasting certain political advertisements

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4 See, e.g., Kingdomware Techs., Inc. v. United States, 136 S.Ct. 1969, 1976 (2016); Turner v. Rogers, 564 U.S. 431, 439-41 (2011); Davis v. FEC, 554 U.S. 724, 735-36 (2008); FEC v. Wis. Right to Life, Inc., 551 U.S. 449, 462 (2007); Norman v. Reed, 502 U.S. 279, 287-88 (1992); Int'l Org. of Masters, Mates & Pilots v. Brown, 498 U.S. 466, 472 (1991); Meyer v. Grant, 486 U.S. 414, 417 n.2 (1988); Honig v. Doe, 484 U.S. 305, 317-23 (1988); Burlington N. R.R. Co. v. Bhd. Of Maint. Of Way Emps., 481 U.S. 429, 436 n.4 (1987); Brock v. Roadway Express, Inc., 481 U.S. 252, 257-78 (1987); Press-Enter. Co. v. Super. Ct. of Cal. for Cty. Of Riverside, 478 U.S. 1, 6 (1986); Globe Newspaper Co. v. Super. Ct. for Cty. of Norfolk, 457 U.S. 596, 603 (1982); Democratic Party of U.S. v. Wisconsin ex rel. La Follette, 450 U.S. 107, 115 n.13 (1981); Gannett Co. v. DePasquale, 442 U.S. 368, 377 (1979); Bell v. Wolfish, 441 U.S. 520, 526 n.5 (1979); First Nat'l Bank of Bos. V. Bellotti, 435 U.S. 765, 774 (1978); United States v. N.Y. Tel. Co., 434 U.S. 159, 165 n.6 (1977); Neb. Press Ass'n v. Stuart, 427 U.S. 539, 546-47 (1976); Gerstein v. Pugh, 420 U.S. 103, 110 n.11 (1975); Super Tire Eng'g Co. v. McCorkle, 416 U.S. 115, 125-27 (1974); Storer v. Brown, 415 U.S. 724, 737 n.8 (1974); Dunn v. Blumstein, 405 U.S. 330, 333 n.2 (1972); S. Pac. Terminal Co. v. ICC, 219 U.S. 498, 514-16 (1911).

shortly before the 2004 election. 551 U.S. 449, 457-60 (2007). Even though the case did not reach the Supreme Court until long after the 2004 election had passed, the Court nonetheless concluded that the case was not moot. Id. at 462-64. The Court reasoned that the organization "credibly claimed that it planned on running 'materially similar' future targeted broadcast ads" in advance of future elections, and the period between elections was too short to allow the organization sufficient time to fully litigate its constitutional challenges sufficiently in advance of the election date. Id.; see also Davis v. FEC, 554 U.S. 724, 735-36 (2008) (rejecting mootness challenge in case whose facts "closely resemble[d]" those at issue in Wisconsin Right to Life).

Justice's case contains a similar admission regarding future conduct. Nikita Cook, the parole agent who assisted the state in its deployment of unconstitutional parole revocation practices against Justice, testified at length about how Justice's case is like any other:

> Q: So you have the hearing officer and you're present at that meeting and did you present witnesses to support the different violations?
>
> A: I don't recall. Uhm, I think I may have had statements from him and I do remember a printout as he said from a cell phone.
>
> Q: **Would you have shown any of that information to the applicant?**
>
> A: **Uhm, probably not because usually they go out and hire an attorney and you give all that information to the attorney.**
>
> Q: Okay. In this instance he elected not to hire an attorney?
>
> A: Correct. Uhm, when you're actually read your rights to go to a hearing, it basically states that you will have the right to hire an attorney. An attorney will not be appointed except in the most extraordinary circumstances.[5]

App. 322 l. 24 – App. 323 l. 15 (emphasis added).

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5 Cook testified she has never, in her entire career, seen a parole examiner appoint counsel to represent an indigent recovee. App. 332 ll. 13 – 23.

However, even when an attorney is present, an alleged revocee is not afforded the minimum due process rights enshrined in decades-old United State Supreme Court precedent,[6] according to Cook. App. 327 ll. 7 – 18. Further, "standard procedure" as described by Cook required non-compliance with the law:

> Q: Did Mr. Justice get a copy of that packet [that was given to the parole board prior to the hearing]?
>
> A: No.
>
> Q: Why not?
>
> A: Because he's not an attorney.
>
> Q: So if he was representing himself, would you not have been able to give him the packet?
>
> A: **It's not standard procedure to**.

App. 334 l. 22 – App. 335 l. 3 (emphasis added).

The admission from a parole agent employed by the State of South Carolina unambiguously defies federal jurisprudence. Thus, "standard procedures" utilized by the state will continue to be illegally weaponized against indigent revocees; it has become the state's official protocol at this point.

The Court of Appeals of Wisconsin has wrestled with this exact situation. State ex rel Olson v. Litscher, 233 Wis.2d 685, 608 N.W.2d 425 (2000). Olson was imprisoned for sexual assault and reached his mandatory release date on or about March 2, 1999. 608 N.W.2d at 426. Because the state department of corrections was unable to locate a residency for Olson, he was transferred to a minimum-security penal institution. Id. at 426-27. Olson petitioned the circuit court for a writ of habeas corpus, contending that his continued incarceration past his statutorily

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6 Gagnon v. Scarpelli, 411 U.S. 778 (1973).

mandated release date was an unlawful restraint of his personal liberty. Id. at 427. While the case was pending, Olson was released. Id. The state then moved to dismiss the petition as moot. Id.

Wisconsin applies a narrower mootness exception than South Carolina: the issue must be "likely of repetition and yet evades review."[7] South Carolina, by comparison, simply requires that a situation only be *capable* of repetition. Applying Wisconsin's more stringent standard, its Court of Appeals nonetheless applied the rationale Justice requests in the matter at bar:

> To begin with, we note that with the recent passage of "Truth in Sentencing," ... this issue will cease to arise as mandatory release on parole for felony offenders will be a thing of the past. But a similar situation could conceivable occur under the "Truth in Sentencing" legislation because of the new requirement that felony sentences be bifurcated to include both confinement and extended supervision. Currently, offenders for whom a suitable residence has not been found are incarcerated beyond their mandatory release dates. **Not only does the problem recur, it is typically resolved pending appellate review. The question is thus one that repeats itself yet evades review. Additionally, it deals with the unlawful restraint of personal liberty—a constitutional question.** For these reasons, we decline to dismiss this case as moot, even though Olson has been released and our decision will have no practical effect on this case.

State ex rel. Olson v. Litscher, 608 N.W.2d 425, 427 (emphasis added and internal citations omitted).

South Carolina courts recognize the "capable of repetition, yet evade review" exception. Byrd v. Irmo High School, 321 S.C. 426, 431-32, 468 S.E.2d 861, 864 (1996). However, for the exception to apply, "the action must be one which will truly evade review." Sloan v. Friends of Hunley, Inc., 369 S.C. 20, 27, 630 S.E.2d 474, 478 (2006). The exception is most applicable in situations where the prejudice suffered by the complaining party is temporary and has ended by the time of appellate review. See Byrd, 321 S.C. at 432, 468 S.E.2d at 864 (finding short-term

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[7] State ex rel. La Crosse Tribune v. Circuit Court, 115 Wis.2d 220, 229, 340 N.W.2d 460 (1983).

student suspensions evade review because they are, "by their very nature, completed long before **an appellate court** can review the issues they implicate") (emphasis added).

In Byrd, a student from Lexington-Richland School District 5 was suspended for ten days after coming onto campus after having consumed alcohol. Id. at 321 S.C. 426, 429 468 S.E.2d 861, 863. After exhausting his appeals through the district's policies, the family engaged counsel who filed suit at the circuit court.[8] Id. at 429-30, 468 S.E.2d at 863. Following the circuit court's dismissal under Rule 12(b)(1) and 12(b)(6), SCRCP, the student sought an appeal, alleging three grounds of error against the circuit court. Id.

After the notice of appeal was filed, Irmo High School moved to dismiss the case as moot. Id. "It assert[ed] that Student's suspension occurred in August and September 1994, that Student has since returned to school, and that the suspension has been cleared from Student's record." Id. at 430, 468 S.E.2d at 863-64. The Byrd opinion was issued approximately eighteen months after the suspension, yet our Supreme Court declined to apply the mootness doctrine and instead found the "capable of repetition, yet evading review" exception applicable.

The Court held that the student's case was not moot because future suspensions could be concluded before *appellate judicial review* could be accomplished:

> Applying this standard, we find that even if it is assumed that the issue in the present case is moot, it is an issue that is capable of repetition, but which will evade review. Short-term student suspensions, by their very nature, **are completed long before an appellate court can review the issues they implicate**. Therefore, we conclude that the present case clearly fits into the evading review exception of the mootness doctrine, even if it were not otherwise appropriate for the Court to address this appeal.

Id. at 432, 468 S.E.2d at 864 (emphasis added).

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8 The student also petitioned the Supreme Court for supersedeas, which was denied. Id. at 430, 468 S.E.2d at 863.

Being sent to prison is far more serious than having to stay home from school. Justice's case nonetheless closely resembles the above scenario such that an identical approach should be applied. All of the situations involve circumstances that exist for a short, fixed time period and may be concluded by the time litigation reaches a court. Because the issue may arise again and will almost always face timing challenges, cases like this one should not be dismissed for mootness. The short-term nature of the re-incarceration has the potential for recurrence but will likely fail to last long enough to permit contemporaneous judicial review.

Further precedent from this Court also supports Justice. In State v. Passmore, the appellant received a one-year sentence for criminal contempt. 363 S.C. 568, 611 S.E.2d 273 (Ct. App. 2005). On appeal to this Court, she alleged a constitutional violation based upon the lack of a jury trial. Id. Although she was no longer incarcerated at the time this Court's opinion was issued, this Could held the issue was **not moot**. Id.

Much like the matter *sub judice*, the state contended in Passmore "that even if Appellant's sentence was unconstitutional, [this Court] should affirm because she has served the sentence, rendering the case moot." Id. at 581, 611 S.E.2d at 280. This Court cited Curtis v. State, 345 S.C. 557, 549 S.E.2d 591 (2001) for the three primary exceptions to the mootness doctrine, including the capable of repetition but evading review exemption. Id. at 582, 611 S.E.2d at 280. This Court found the "capable of repetition yet evading review" exception and another applicable and therefore refused to dismiss Passmore's appeal as moot. Id. at 582, 611 S.E.2d at 281.

Applying a similar rationale as discussed above, this Court held:

> [T]he State concedes in its brief: "the sentence was in fact too brief to be fully litigated through appeal prior to its expiration..." The issue, then, is whether the constitutional violation suffered by Appellant could be inflicted on a contemnor in the future. **That the unconstitutional sentence was imposed here is evidence enough a judge could make the same error in the future.**

Id. at 582, 611 S.E.2d at 281 (emphasis added).

In this Court's opinion in the instant case, reference was made to Passmore only to the extent that she suffered collateral consequences following a conviction. In doing so, this Court overlooked the portion of Passmore described herein, namely that unconstitutional actions are indisputable evidence that the same conduct is capable of reoccurring. Without a decision from this Court, future parolees will continue to be illegally incarcerated.

Prison sentences and parole in South Carolina

Justice was serving a sixty-year sentence and his case was held moot because of South Carolina's sentencing scheme. It will be the rare defendant who receives a parole-eligible sentence that exceeds Justice's. Our structure of prison sentences is therefore ripe for abuse, where parole is generally available only in cases where the *maximum* sentence is fifteen years.[9] S.C. Code Ann. § 24-13-100. Therefore, an inmate who was eligible for parole, received it, and had it revoked then has a limited number of years remaining on his or her sentence. As a result, judicial review will not likely occur before an individual is released. Repeated constitutional violations are all but guaranteed.

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9 Buchanan, Matthew, S.C. Department of Probation, Parole and Pardon Services, p. 10, https://sccid.sc.gov/resource_bank/uploads/conferences-and-cles/2020-annual-public-defender-conference-092020/Buchanan_DPPP-Update_PDCon2020.pdf (last accessed May 11, 2022).

There exist three categories of adult sentences served at the South Carolina Department of Corrections: 1) parolable sentences; 2) no parole or 85% sentences; and 3) day for day or "mandatory minimum" sentences. The first category is relevant to this matter. Individuals serving parolable sentences earn the most amount of good time and work/education credits—twenty days of good time and an average of work/education credits per month. According to materials provided by SCDC's general counsel, these offenders, on average, serve between 53% and 65% of their sentences.[10] This calculation entails consideration of good time credit under S.C. Code Ann. § 24-13-210 and earned work and education credits under S.C. Code Ann. § 24-13-230. Parole was available to Justice after serving one-third of his sentence, according to the burglary second degree statute:

> Burglary in the second degree pursuant to subsection (B) is a felony punishable by imprisonment for not more than fifteen years, provided, that no person convicted of burglary in the second degree pursuant to subsection (B) shall be eligible for parole except upon service of not less than one-third of the term of the sentence.

S.C. Code Ann. §16-11-312(C)(2).

In Mims v. State, our Supreme Court held that for purposes of parole eligibility, consecutive sentences should be treated as one general sentence by aggregating the periods imposed in each sentence. 273 S.C. 740, 259 S.E.2d 602 (1979). Even with a sixty-year sentence, Justice's case was deemed to be moot by this Court. A typical case would see the same result based on this Court's current opinion. Defendants sentenced for a single burglary in the second degree would fare no better following our "standard" unlawful revocation procedure. A defendant serving the maximum fifteen-year sentence would be parole eligible after one-third, or

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10 Bigelow, Christina Understanding Prison Sentences p. 4, https://sccid.sc.gov/resource_bank/uploads/conferences-and-cles/2021-annual-public-defender-conference-092021/Bigelow_Understanding-Prison-Sentences_PDCON21.pdf (last accessed May 9, 2022).

five years. Assuming parole is granted as early as possible following the maximum sentence, the difference between parole eligibility (five years) and the 53% described above (approximately eight years) is only three years. Therefore, an individual who was subject to tainted revocation procedures, as Justice was, would likely not even receive a PCR evidentiary hearing by the time he or she "maxed out" the sentence, because the state would move to dismiss the action as moot three years after the filing of the action. In other words, an individual would need to be sentenced to *more than sixty years* for parole eligible, non-violent offenses in order to receive judicial review. If Justice's case evades judicial review, almost every single every other case does too.

The opinion this Court issued in Justice's case suggests a future inmate "may file a PCR petition, and a court will have the opportunity to rule on the issues at that time." However, between the significant delays facing PCR applicants[11] as they seek finality through the judicial process, it is unlikely that said future parolee who received a combination of consecutive parole-eligible non-violent offenses totaling less than sixty aggregate years will receive judicial review before the brief period of re-incarceration following revocation concludes. As such, this case falls squarely within the "capable of repetition, yet evading judicial review" exception to the mootness doctrine. The theory of mootness must give way to the realities of these delays. The exception to the mootness doctrine recognizes this real-world problem. This Court erred in passing on real-world constitutional violations.

Justice was deprived of numerous due process rights under the auspices of "standard procedure" for the South Carolina Department of Probation, Pardon and Parole Services. The brutally candid testimony of Nikita Cook illustrates how future revocees will lose their freedom

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11 Justice filed his PCR application on or about February 26, 2014. This Court's opinion was issued on May 4, 2022, over eight years later.

without being able to exercise their constitutional rights. The flagrant constitutional violations will continue to infect the parole revocation process until an appellate court holds the state responsible. Justice now requires that this Court exercise its judicial authority to prevent indigent citizens from facing identical, fundamentally unfair, and unconstitutional treatment at the hands of the government and its "standard procedure."

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ATTORNEY FOR PETITIONER

This 19th day of May, 2022.

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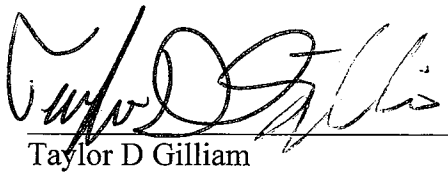
STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2017-001718

CERTIFICATE OF SERVICE

Pursuant to Rule 262(a)(3) and Rule 262(c)(3), SCACR, the undersigned hereby certifies a true copy of the Petition for Rehearing in the above-referenced case has been served upon Lilly Meadows, Esquire, at the primary e-mail address listed in the Attorney Information System (AIS); and on William Bruce Justice at 1498 Cook Rd., Ridgeway, SC 29130, this 19th day of May, 2022.



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