

FEBRUARY 1977

C8685
3, P55
1977/2
Copy 1

POLICE OFFICER'S HANDBOOK

PART XXXIII

S. C. STATE LIBRARY

NOV 23 2004

ENTRAPMENT
(US v. Rutledge)

STATE DOCUMENTS

FORCIBLE ENTRY WITHOUT WARNING...
COMMON HALLWAY OR COURTYARD
(US v. Fluker)

SURGICAL REMOVAL OF BULLET
FROM BODY OF SUSPECT
(US v. Crowder)

FLEMING'S NOTEBOOK...Chapter 133:

NEW LIGHT ON MIRANDA
(Oregon v. Mathiason)

Prepared under the direction of E. Fleming Mason
Producer of Crime-to-Court ETV Law Enforcement
Informational Programs, in cooperation with South
Carolina Educational Television Network with funds
provided through the South Carolina Criminal
Justice Academy.

5 5/8
27/8

LAW ENFORCEMENT - ETV TRAINING PROGRAMS

POLICE OFFICER'S HANDBOOK

ENTRAPMENT
(US v. Rutledge)

FORCIBLE ENTRY WITHOUT WARNING...
COMMON HALLWAY OR COURTYARD
(US v. Fluker)

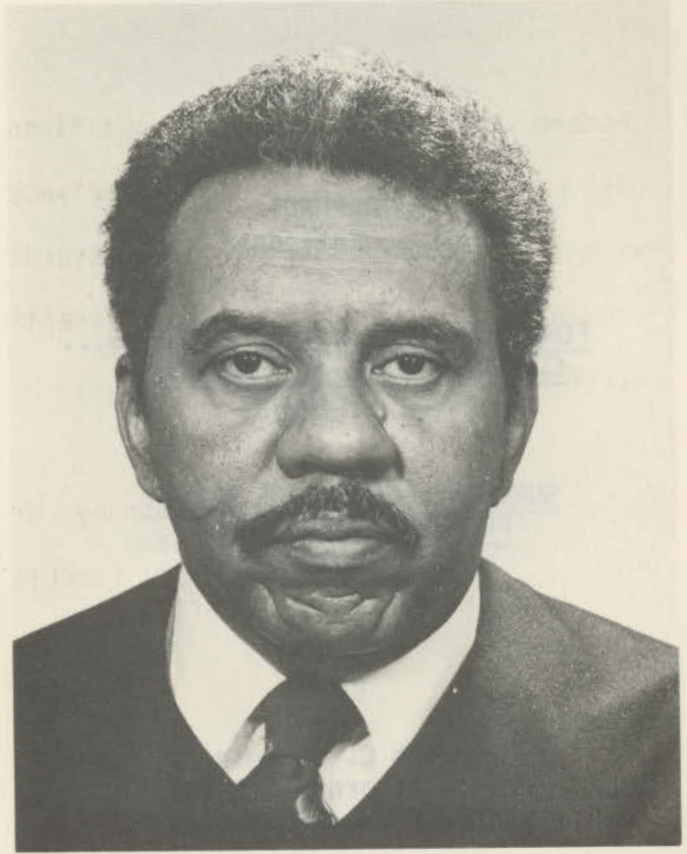
SURGICAL REMOVAL OF BULLET
FROM BODY OF SUSPECT
(US v. Crowder)

By

Joseph C. Coleman
Deputy Attorney General
State of South Carolina

Endorsed by

South Carolina Governor, James B. Edwards
South Carolina Law Enforcement Division
South Carolina Sheriffs' Association
South Carolina Enforcement Officers' Association
South Carolina Police Chiefs' Executive Association
South Carolina FBI National Academy Associates
South Carolina Southern Police Institute Associates



Hon. Ernest A. Finney, Jr.
Circuit Judge
3rd Judicial Circuit
South Carolina

"Modern legal thinking is that a citizen has a right to expectation of privacy with respect to hallways and courtyards provided for common use of all tenants ...if such areas are secured."

Ernest A. Finney, Jr.
Circuit Judge
3rd Judicial Circuit
South Carolina

CONTENTS

	Page
Foreword by Hon. Ernest A. Finney, Jr.....	2
<u>ENTRAPMENT AS DEFENSE TO CRIME</u>	4
<u>United States v. Rutledge</u> , 405 F.Supp.994.....	4
 <u>FORCIBLE ENTRY WITHOUT WARNING</u>	
Door to Common Hallway or Courtyard.....	16
<u>United States v. Fluker</u> , 543 F2d 709.....	16
 <u>SURGICAL REMOVAL OF BULLET FROM SUSPECT'S BODY</u> ..	27
<u>United States v. Crowder</u> , 543 F2d 312.....	27
 FLEMING'S NOTEBOOK, Chapter 133.....	34
 <u>MIRANDA RULE MODIFIED</u>	35
<u>Oregon v. Mathiason</u>	35
US Sup. Ct., No. 76-201, decided January 25, 1977	

ENTRAPMENT

United States v. Rutledge
405 F.Supp.994

A defendant when charged with crime will frequently claim 'entrapment' whenever the circumstances permit, and, frequently, when they will not.

'Entrapment' is a good defense to a criminal charge, so it is important that police officers as well as judges have a clear understanding of what 'entrapment' is.

Recently, in the State of Indiana a man named Rutledge was convicted in Federal court of sale of heroin. His principal defense was a claim that he had been 'entrapped' by police officers into committing the crime charged, and, therefore, could not be convicted.

These are the facts leading up to the conviction and appeal.

FACTS

"The Government's chief witness was Thomas L. Hendricks, a police officer employed by the Hammond City Police Department for the past three years. On December 8, 1974 Officer Hendricks, while on assignment to the Lake County Multi-Narcotics Agency as an undercover agent, drove to the defendant's residence accompanied by his informant, James Freeman, who was personally acquainted with the defendant. The defendant and a Henry Hill entered the vehicle, sitting in the rear seat behind Hendricks and his informant. Officer Hendricks and the defendant discussed the sale of heroin and the defendant indicated that the smallest quantity that Hendricks could purchase would be \$50.00 worth of heroin and Hendricks told the defendant that he wanted to purchase that amount.

The defendant also stated that Hendricks and Freeman had caught him just in time because he was on his way to purchase heroin for himself and some others, but that in the future if the two wished to purchase heroin they would have to deal directly with him or with Henry Hill.

"The four men drove to the area of the 4900 block of Melville Avenue in East Chicago, Indiana at which time Hendricks dropped the defendant off in the middle of the block and then circled the block pursuant to the defendant's instructions. Freeman gave the defendant \$50.00 for the purchase of the heroin at the time the defendant left the car. The defendant entered the residence of a Dennis Shaw and obtained the heroin. After circling the block twice Hendricks picked up the defendant at the point where he had been dropped off. The defendant handed Hendricks a plastic wrapped container holding two \$25.00 bags of heroin, commenting that the bags were a little bigger than

usual. At the time of trial Hendricks identified the defendant as the man from whom he purchased the heroin.

"Hendricks kept the container of powder obtained from the defendant in his west Criminal Toxicology Laboratory for qualified analytical chemist employed at the Laboratory, determined that the powder contained heroin. The powder, the container and the laboratory envelope were admitted into evidence at the trial.

"The defendant testified that the reason he got involved in the distribution of the heroin to Hendricks and Freeman was that he felt sorry for Freeman at the time the two came to his home because he thought Freeman was going through withdrawal. However, the defendant was unable to point to any particular symptoms of withdrawal which led him to that conclusion. Hendricks, based on his experience as a police officer, testified that he

did not observe any symptoms of withdrawal on the part of Freeman."

DEFENSE OF ENTRAPMENT

"The defendant has admitted the distribution of heroin involved in this cause but raises the defense of entrapment. The defendant argues that he felt sorry for James Freeman and as a result was entrapped into the distribution. However, such a conclusion is not merited by the facts in this case and the law regarding entrapment. The defendant was not acting out of sympathy for the informant because the informant was not ill nor undergoing withdrawal; further the defendant evidenced his own predisposition to distribute the heroin by his statements that Hendricks and the informant caught him just in time and that the two should deal directly with him in the future.

"To determine whether entrapment has been established, a line must be drawn between the trap for the unwary innocent and the trap for the unwary criminal."

"The most recent statement on entrapment from the Supreme Court of the United States is in United States v. Russell, in which Mr. Justice Rehnquist, speaking for the Supreme Court, stated:

"Several decisions of the United States district courts and courts of appeals have undoubtedly gone beyond this Court's opinions in Sorrells and Sherman in order to bar prosecutions because of what they thought to be, for want of a better term, 'overzealous law enforcement'. But the defense of entrapment enunciated in those opinions was not intended to give the federal judiciary a 'chancellor's foot' veto over law enforcement practices of which it did not approve. The execution of the federal laws under our Constitution is confined primarily to the Executive Branch of the

Government, subject to applicable constitutional and statutory limitations and to judicially fashioned rules to enforce those limitations. We think that the decision of the Court of Appeals in this case quite unnecessarily introduces an unmanageably subjective standard which is contrary to the holdings of this Court in Sorrells and Sherman.

"Those cases establish that entrapment is a relatively limited defense. It is rooted not in any authority of the Judicial Branch to dismiss prosecutions for what it feels to have been 'overzealous law enforcement', but instead in the notion that Congress could not have intended criminal punishment for a defendant who has committed all the elements of a prescribed offense, but was induced to commit them by the Government.

"In cases tried to a jury, when the issue of entrapment is relevant, the court gives the following

instruction:

"The defendant asserts that he was a victim of entrapment as to the crime charged in the indictment."

"Where a person has no previous intent or purpose to violate the law, but is induced or persuaded by law enforcement officers or their agents to commit a crime, he is a victim of entrapment, and the law as a matter of policy forbids his conviction in such a case.

"On the other hand, where a person already has the readiness and willingness to break the law, the mere fact that Government agents provide what appears to be a favorable opportunity is not entrapment. For example, when the Government suspects that a person is engaged in the illicit sale of narcotics, it is not entrapment for a Government agent to pretend to be someone else and to offer, either directly or through an informer or other decoy, to purchase narcotics from such suspected person.

"If, then, the jury should find beyond a reasonable doubt from the evidence in the case that, before anything at all occurred respecting the alleged offense involved in this case, the defendant was ready and willing to commit crimes such as charged in the indictment, whenever opportunity was afforded, and that the Government officer or their agents did not more than offer the opportunity, then the jury should find that the defendant is not a victim of entrapment.

"On the other hand, if the evidence in the case should leave you with a reasonable doubt whether the defendant had the previous intent or purpose to commit any offense of the character here charged, and did so only because he was induced or persuaded by some officer or agent of the Government, then it is your duty to acquit him.

"In determining whether entrapment has been established, a line must be drawn between the trap for the unwary criminal."

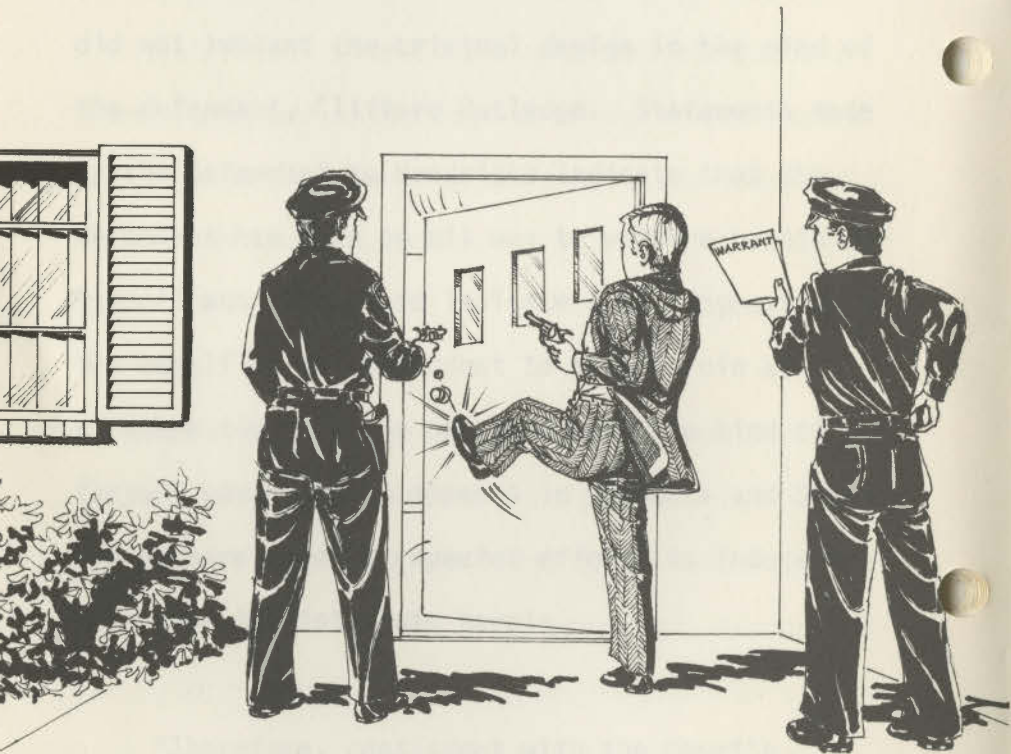
RULING OF TRIAL JUDGE

ENTRAPMENT NOT PROVEN

"As the trier of fact in this case the Court finds that any deception on the part of Hendricks did not implant the criminal design in the mind of the defendant, Clifford Rutledge. Statements made by the defendant to Hendricks indicate that the defendant had been on his way to procure heroin for himself and others and indicate a willingness on the behalf of the defendant to sell heroin at a future time. We do not find here the kind of a factual context that appears in *Sorrells* and *Sherman* since there were no repeated efforts to induce the defendant to distribute heroin.

"Therefore, consistent with the Court's responsibility in this case to weigh the evidence and to determine the credibility of the witnesses the Court finds that the defendant has failed to establish either as a matter of fact or law the

defense of entrapment. Therefore, the defendant is adjudged and determined to be guilty of the offense charged in the indictment."



FORCIBLE ENTRY WITHOUT WARNING...

DOOR TO COMMON HALLWAY OR COURTYARD

(United States v. Fluker, 543 F2d 709)

Police in Anchorage, Alaska, recently used an unusual method by which to insure that they took the precaution of obtaining a search warrant before entering suspect premises in connection with a drug raid...then blew the whole thing by failure to observe a very simple rule (demand for entrance by identifying themselves and announcing their purpose).

It is well known, of course, that authorities executing a search warrant must identify themselves, knock, announce their purpose, and demand entrance ...in the absence of exigent or emergency circumstances indicating possible danger to the officers by doing so, or the probability that evidence is being destroyed (such as hearing the flushing of a toilet in a drug raid).

In the Anchorage case, officers had the suspect premises under surveillance, having sent a young undercover agent inside to obtain evidence that would support a search warrant.

FACTS

"On November 1, 1974, a young woman who was a drug user began furnishing confidential information to DEA Special Agent Robert Johnstone concerning alleged narcotics-related activities of appellant Young. Based on information furnished by this informant and by DEA surveillance of Young's apartment, a search warrant was issued on November 4, 1974...and was served by Drug Enforcement Administration agents on the premises of Young's apartment that same day.

"Young lived in one of two basement apartments at 1127 East 15th Street in Anchorage, and Fluker rented the other. The upper level of the building

was occupied by the landlord, although this fact apparently was not known by the DEA agents. At the bottom of an outside stairway to the lower level of the building, a common doorway led into a small entry way or corridor. Immediately off the corridor were the doorways to two apartments. The common doorway opening into the corridor was usually locked (as it was on the day in question) and only the tenants and the landlord had keys. The outside stairway to the lower level apartments led directly down to this entry doorway, which was so situated that someone standing in front of it could move neither to the left nor to the right.

"On November 4, 1974, DEA Agents Edward A. Burke and other agents accompanied the confidential informant to the apartment building in question, and the informant entered Young's apartment. Upon leaving the apartment, she returned to Burke and produced a rubber balloon filled with a brown powdery substance which later proved to be heroin.

The informant also stated to Burke that she had observed appellants Young and another individual cutting the heroin while she was in the apartment. Burke then proceeded to relay this information by radio to Johnstone, who prepared an affidavit, obtained the search warrant, and radioed back that the warrant had been issued.

"The search then commenced. Special Agent O'Brien approached the common doorway at the bottom of the stairs, and while the evidence is unclear whether or not he gave an announcement of authority and purpose before forcing the common door open, the district court found, and we accept the finding for purposes of review, that no announcement was made at this point. After kicking the common doorway in, the DEA agents were at the door to Young's apartment, which the district court found was at least partially open. Again the evidence is somewhat conflicting, but it seems relatively clear that the officers announced themselves and ordered the

occupants of the apartment to freeze virtually simultaneously with their entry into the apartment itself.

"The agents arrested both Young and Foster; the later was standing in the living-room-bedroom area, approximately ten feet from the kitchen sink. Following his arrest, Foster was subjected to a search of his person which produced a quantity of narcotics. A search of the apartment produced narcotics paraphernalia and heroin on the kitchen sink and on the kitchen table."

FORCIBLE, UNANNOUNCED ENTRY TO

COMMON HALLWAY UNLAWFUL

"Having concluded that the affidavit supporting the issuance of the search warrant for Young's apartment was sufficient, we now turn to the novel question of whether the officers' forcible entry through the common outer doorway violated 18 U.S.C. §3109, which provided as follows:

"The officer may break open any outer or inner door or window of a house, or any part of a house, or anything therein, to execute a search warrant, if, after notice of his authority and purpose, he is refused admittance or when necessary to liberate himself or a person aiding him in the execution of the warrant."

"In breaking down the outer doorway opening onto the corridor off of which appellants Young's and Fluker's apartments were located without an

announcement of authority and purpose, Young and Foster argue, the officers violated §3109, and hence the fruits of the searches of Young's apartment and of Foster's person that followed should have been suppressed. In reviewing the propriety of the district court's ruling on the suppression motion, we follow a two-step analysis: first, we must decide whether, under the circumstances of this case, §3109's requirement of announcement of authority and purpose was applicable to the outer doorway opening onto the corridor, or whether the section applies only to the door of Young's apartment itself. Second, if we find that §3109 was indeed applicable to the entry of the outer doorway, we must consider whether exigent circumstances existed that would excuse compliance with the section's provisions for announcement.

"In the only reported case called to our attention thus far to apply the requirements of §3109 to an outer door of an apartment building,

a district court in Ohio in 1966 found itself faced with a fact situation quite similar to the one before this Court. United States v. Blank, 251 F.Supp.166 (N.D. Ohio 1966). In *Blank* the searching officers, armed with a search warrant for apartment number 6 in a specific building whose outer door was always locked and could be "buzzed" open only by tenants or the superintendent, smashed a window next to the outer door and reached through it to open a front door. They made no attempt to "buzz" any of the apartments or to summon the superintendent before forcing entry in this way. In holding that this entry violated §3109, the district court found that *St. Clair* was distinguishable because there, the vestibule door had been left ajar and thus no forcible entry was required to enter the hallway; moreover, the landlord had been summoned and had refused the agents permission to enter after they had apprised him of their mission. The court refused to place its holding solely on these differences, however, and expressly rejected the

St. Clair court's fears of unduly hampering law enforcement should § 3109 be found applicable in such situations: "We cannot assume that in every instance the landlord is a look-out for his outlaw tenants." 251 F.Supp. at 174. The court also stressed the common law concept of "curtilage" underpinning the Fourth Amendment and concluded that the concept included, in an apartment building context, hallways and stairways closed from public intrusion.

"(I)t seems to us a more appropriate test in determining if a search and seizure adjacent to a house is constitutionally forbidden is whether it constitutes an intrusion upon what the resident seeks to preserve as private even in an area which, although adjacent to his home, is accessible to the public. . . ."

Thus the critical question before this Court is whether, under the particular circumstances of

this case, appellant Young can be said to have had a "reasonable expectation of privacy" with respect to the corridor area separating the door of his apartment from the outer doorway of the apartment building. After careful consideration of the record, we conclude that such was the case, and that consequently § 3109 was applicable to the outer doorway.

We begin with the facts that this building was not containing many individual apartment units, but rather was comprised of only two apartments on the basement level and the landlord's living quarters on the upper floor. Thus, the entry way was one to which access was clearly limited as a matter of right to the occupants of the two basement apartments, and it is undisputed that the outer doorway was always locked and that only the occupants of the two apartments and the landlord had keys thereto. In light of the size of the building, then, we find significant the fact that the door to the hallway

giving access to the two apartments was locked; the two lower-level tenants thus exercised considerably more control over access to that portion of the building than would be true in a multi-unit complex, and hence could reasonably be said to have a greater reasonable expectation of privacy than would be true of occupants of large apartment buildings.

Another significant fact is that directly beyond the outer doorway, actually within reach, lay the door to appellant Young's apartment. Thus, a knock on the outer door might well have been audible in Young's apartment, and would not have been a useless gesture. It is also worth noting that the district court found that the door to Young's apartment was at least partially open when the officers broke down the outer door and gained access to the corridor, thus indicating that Young felt some degree of safety and privacy because of the existence of the outer, locked doorway.

SURGICAL REMOVAL OF BULLET
FROM SUSPECT'S BODY

(United States v. Crowder, 543 F2d 312)

Search and seizure sometimes involves unusual or even strange facts. We all know of the rulings of the United States Supreme Court that permit forcible withdrawal of blood from the body of a suspect when there is probable cause to believe that the presence of alcohol might be the basis of a criminal prosecution. Consent of the suspect is not necessary...and...in most cases...time will not permit application for and issuance of a search warrant.

But...what is the law when there is good reason to believe that an evidentiary bullet is lodged in the body of a suspect and he will not give his consent to its removal?

Recently...all nine members of the Federal Court of Appeals in Washington, D. C., felt that the question was so important that the entire court heard

a case involving this simple question. It arose out of these facts.

FACTS

On the afternoon of December 18, 1970 Dr. James E. Bowman, a dentist, was murdered in his office. Death was caused by a gunshot wound entering his chest and coursing through his heart. A caliber .32 slug was recovered from his body, and another caliber .32 slug, which apparently had passed through his body, was found in his underwear. The police found a caliber .32 Smith & Wesson revolver on the ground, across the street from the doctor's office. The revolver contained four expended rounds and two live rounds. It had been kept in the doctor's office and was registered to his wife.

On December 23, 1970 the police arrested one Sandra Toomer, charged her with the murder, and she in turn implicated Crowder. She told the police

that she and Crowder had gone to the doctor's office intending to rob him. When Crowder confronted the doctor with a toy pistol, she said, a scuffle ensued, she ran, and she then heard gun shots. Rejoining her, Crowder told her he had been shot in his arm and his left leg, but he thought he had killed the doctor. She observed Crowder's wounds.

Acting on the information given by Sandra Toomer the police arrested Crowder. They noted that his right wrist and left thigh were bandaged. They took him to D.C. General Hospital where x-rays disclosed a bullet lodged in his right forearm and another in his left thigh. The bullets appeared to be caliber .32 slugs. Crowder refused to be treated for his wounds.

As might be expected the police and the prosecutor thought it important to determine whether the slugs in Crowder's arm and leg had been fired from the Bowman revolver. Accordingly, on

February 10, 1971 the United States Attorney presented to Chief Judge Curran of the District Court an application for an order authorizing the surgical removal of the bullet from Crowder's arm. The application was supported by an affidavit from Detective Richardson of the Homicide Unit, Metropolitan Police, narrating in substance the evidence that we have set out. In addition, the United States Attorney tendered an affidavit from Dr. Marcus Goumas, Senior Medical Officer at the District of Columbia jail where Crowder was incarcerated. Dr. Goumas affirmed that x-rays of Crowder's left thigh and right forearm revealed the presence of metallic foreign bodies resembling bullets. Dr. Goumas expressed the opinion that it would be medically inadvisable to remove surgically the slug from Mr. Crowder's left thigh because such a procedure might cause the reduction of use or function of his left leg. The slug in his right forearm, however, is lying superficially under the skin. It is therefore my medical opinion, based

upon reasonable medical certainty, that the surgical removal of the slug would not involve any harm or risk of injury to Mr. Crowder's arm or hand or the use thereof. The surgical removal of the slug would be considered as minor surgery. If authorized, it will be performed in accordance with accepted medical practices by one or more surgeons in an operating room at D.C. General Hospital under a local anesthetic. Mr. Crowder will probably be hospitalized for a few days in D.C. General Hospital after this surgery to guard against possible infection.

The United States Attorney's application came on for hearing before Chief Judge Curran on February 10. The defendant Crowder appeared with counsel and objected to the entry of the requested order. Dr. Goumas took the stand and in response to questions by Crowder's counsel testified that the bullet in Crowder's right arm "entered the lateral aspect of the . . . arm and then extended distally and it

ended superficially, roughly about three inches or so from the point of entrance. It was a very superficial wound" The wound was "so superficial" said the Doctor, that removal of the bullet would not affect any radioulnar or medial nerves. "(I)t is a superficial lesion, just like removing a small sebaceous cyst; it would not produce any lasting defect that I can envision." He concluded that the operation could be done under a local anesthetic, and the risk involved would be similar to the risk in "crossing the street".

Chief Judge Curran found probable cause to believe that Crowder murdered Dr. Bowman and that "evidence or instrumentality of that offense" was located in Crowder's right forearm and left thigh. The finding is not challenged. Further, the judge found:

It is medically inadvisable to remove surgically the slug from James L. Crowder's left thigh because this procedure might cause

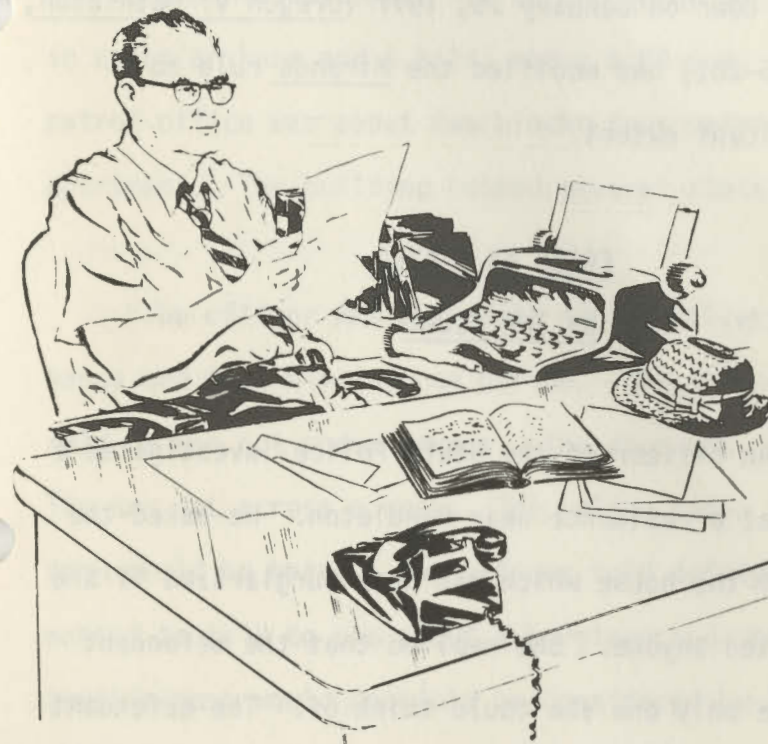
the reduction of use or function of his left leg. However, the surgical removal of the slug in his right forearm which is lying superficially beneath the skin would not involve any harm or risk of life or injury to James L. Crowder's arm or hand or the use thereof.

COURT ORDER TO REMOVE BULLET

REASONABLE AND LAWFUL

If the defendant's argument is sound then no intrusion into a man's body that goes beyond a needle prick can ever be authorized by a court. We cannot agree that this is or ought to be the law. In our opinion the prosecuting authorities in this case made an intelligent and commendable effort to comply with the law; they resorted to "skillful and imaginative legal planning, bottomed upon cooperative utilization, rather than utter disregard, of judicial power, and designed to achieve legitimate ends."

FLEMING'S NOTEBOOK



FLEMING'S NOTEBOOK... Chapter 133:

MIRANDA RULE MODIFIED

The United States Supreme Court in a decision handed down on January 25, 1977 (Oregon v. Mathiason, No. 76-201) has modified the Miranda rule to a significant extent.

FACTS AS STATED

BY THE COURT

"An officer of the State Police investigated a theft at a residence near Pendleton. He asked the lady of the house which had been burglarized if she suspected anyone. She replied that the defendant was the only one she could think of. The defendant was a parolee and a 'close associate' of her son. The officer tried to contact defendant on three or four occasions with no success. Finally, about 25 days after the burglary, the officer left his card at

defendant's apartment with a note asking him to call because 'I'd like to discuss something with you.' The next afternoon the defendant did call. The officer asked where it would be convenient to meet. The defendant had no preference; so the officer asked if the defendant could meet him at the state patrol office in about an hour and a half, about 5:00 p.m. The patrol office was about two blocks from defendant's apartment. The building housed several state agencies."

"The officer met defendant in the hallway, shook hands and took him into an office. The defendant was told he was not under arrest. The door was closed. The two sat across a desk. The police radio in another room could be heard. The officer told defendant he wanted to talk to him about a burglary and that his truthfulness would possibly be considered by the district attorney or judge. The officer further advised that the police believe defendant was involved in the burglary and (falsely stated that) defendant's fingerprints were found at the scene. The defendant

sat for a few minutes and then said he had taken the property. This occurred within five minutes after defendant had come to the office. The officer then advised defendant of his *Miranda* rights and took a taped confession."

"At the end of the taped conversation the officer told defendant he was not arresting him at this time; he was released to go about his job and return to his family. The officer said he was referring the case to the district attorney for him to determine whether criminal charges would be brought. It was 5:30 p.m. when the defendant left the office."

"The officer gave all the testimony relevant to this issue. The defendant did not take the stand either at the hearing on the motion to suppress or at the trial."

RULING

The Supreme Court held that the defendant Mathiason was not in custody at the time of the questioning by the police officer and that he was not "otherwise deprived of his freedom in any significant way". Miranda warnings in these circumstances were not required, said the Court. . . even though the defendant was the only suspect, was on parole for another crime, and was falsely informed by the questioning officer that his fingerprints had been found at the scene of the crime.

STATEWIDE LAW ENFORCEMENT TRAINING
THROUGH TELEVISION

S.C. Law Enforcement Training
Council Members

J.P. Strom-Chairman	P.F. Thompson
James Metts	Dr. James A. Timmerman, Jr.
Charles Dawley	William D. Leeke
Charles J. Devic	Dean-U.S.C. Law School (Vacant)
L.E. Simmons	James L. Anderson
Daniel R. McLeod	James P. Ashmore

Clifford A. Moyer - Executive Director
S.C. Criminal Justice Academy

Continued from previous page
W.D. Brown, Jr.
S.C. Law Enforcement Training
201 E.L.A. Williams

S.C. ETV NETWORK
2712 Millwood Avenue
P.O. Drawer L
Columbia, South Carolina 29250

Nonprofit Organization
U.S. Postage
PAID
Columbia, S.C.
Permit No. 1061