OCTOBER TERM 2019

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

RAY JEFFERSON CROMARTIE,
Petitioner,

v.

WARDEN, GEORGIA DIAGNOSTIC AND CLASSIFICATION PRISON
Respondent.

On Petition for Writ of Certiorari to the
United States Court of Appeals for the Eleventh Circuit

EMERGENCY APPLICATION FOR STAY OF EXECUTION
EXECUTION SCHEDULED FOR 7:00 P.M., WEDNESDAY NOVEMBER 13, 2019

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November 13, 2019

Petitioner, Ray Jefferson Cromartie, respectfully seeks an emergency stay of execution pending the consideration of his petition for a writ of certiorari. The State of Georgia plans to execute him tonight, **Wednesday, November 13, 2019, at 7:00 p.m.** This Motion is being filed shortly prior to Mr. Cromartie's Petition for a Writ of Certiorari to the United States Court of Appeals for the Eleventh Circuit.

QUESTIONS PRESENTED

In this capital case, Ray Jefferson Cromartie was convicted of malice murder and sentenced to death as the man who shot a store clerk, Richard Slysz. The robbery was committed by two men, with a third acting as getaway driver. Mr. Cromartie was convicted largely on the testimony of his co-defendant, Corey Clark, the getaway driver, Thaddeus Lucas, and two associates who claimed Mr. Cromartie admitted the shooting. Mr. Cromartie, however, has always maintained that he did not shoot Mr. Slysz.

After years of silence concerning the identity of the shooter, Thaddeus Lucas has now come forward and attested in a sworn affidavit that Corey Clark admitted committing the shooting. Mr. Cromartie sought to reopen the judgment based on this new evidence of his innocence of malice murder, and proffered evidence of his diligence both from Mr. Lucas's affidavit and from the declaration of an investigator concerning current counsel's repeated efforts to locate and obtain information from Mr. Lucas.

The lower courts denied the request to reopen the judgment on the ground that Mr. Cromartie had not been diligent in obtaining the new evidence from Mr. Lucas, because it purportedly could have been obtained by trial counsel and/or state habeas counsel. Mr. Cromartie has alleged that prior counsel provided ineffective assistance. The questions presented are as follows:

1. If a petitioner's prior counsel provided deficient representation by failing to obtain or present evidence of innocence, should evidence obtained by subsequent diligent counsel be deemed new evidence of innocence (an issue as to which there is a circuit split)?

2. When there are material issues of fact regarding a petitioner's diligence with respect to the presentation of new evidence of innocence, should a federal district court hold a hearing to resolve those issues?

INTRODUCTION

Ray Jefferson Cromartie is a Georgia death row inmate. The State intends to carry out Mr. Cromartie's death sentence in spite of the fact that no federal court has ruled on the merits of his claim that trial counsel ineffectively failed to present mitigating evidence at the penalty phase of his trial.

This Court has long enforced the humane constitutional requirement that the State may not execute a person absent an individualized and reliable capital sentencing process. Mr. Cromartie was deprived of this opportunity by an unbroken chain of ineffective trial counsel, state post-conviction counsel, and initial federal habeas counsel, and by the absence of a statutory procedure to present his claim outside the traditional avenues when his court-appointed counsel failed him.

While Mr. Cromartie has consistently maintained his innocence of malice murder for the past 25 years, the State of Georgia continues to obstruct his requests for DNA testing. His appeal of the lower federal courts' denial of relief pertaining to the DNA testing is pending in this Court. In this petition, Mr. Cromartie appeals the Eleventh Circuit's denial of relief from judgment based on different, newly available evidence of innocence–the statement of a co-defendant who previously refused to tell the truth to Mr. Cromartie's defense team. This evidence would permit the district court to consider for the first time his claim that his trial counsel were ineffective for failing to adequately investigate and present mitigating evidence at the penalty-phase of Mr. Cromartie's capital trial.

Mr. Cromartie offers four extraordinary circumstances that justify relief from judgment. *See* Section A.1 *infra*. However, a circuit split threatens to deny Mr.

Cromartie relief. The split, which relates to the "actual innocence gateway" from *Schlup v. Delo*, 513 U.S. 298 (1995), is whether exculpatory evidence demonstrating actual innocence must be newly discovered or whether it is sufficient that the evidence was not presented to the fact-finder at trial.

To honor the Eighth Amendment's guarantee of an individualized and reliable capital sentencing determination, and to serve the interest of fundamental fairness, this Court should stay Mr. Cromartie's execution to resolve a long-standing circuit split and allow for meaningful consideration of the merits of Mr. Cromartie's Rule 60(b) motion.

THIS COURT SHOULD GRANT A STAY OF EXECUTION

The factors to be considered with respect to a request for a stay are as follows:

> (1) whether the stay applicant has made a strong showing that he is likely to succeed on the merits; (2) whether the applicant will be irreparably injured absent a stay; (3) whether issuance of the stay will substantially injure the other parties interested in the proceeding; and (4) where the public interest lies.

Nken v. Holder, 556 U.S. 418, 434 (2009) (quoting *Hilton v. Braunskill*, 481 U.S. 770, 776 (1987)); *accord In re Holladay*, 331 F.3d 1169, 1176 (11th Cir. 2003) (granting stay of execution).

A. Likelihood of Success

In a capital case, the likelihood of success factor is satisfied when the plaintiff makes a "substantial showing of the denial of a federal right." *Barefoot v. Estelle*, 463 U.S. 880, 893 (1983) (citation and quotation marks omitted). That showing is made if the court determines that the "issues are debatable among jurists of reason; that a court could resolve the issues in a different manner; or that the questions are

adequate to deserve encouragement to proceed further." *Id.* at 893 n.4 (citation and quotation marks omitted). "When non-frivolous issues are presented . . . in a capital case," courts have "made it clear that a stay of execution should be issued, even if only temporarily, when a stay is needed for the court to address such issues before the appeal becomes moot." *Ford v. Haley*, 179 F.3d 1342, 1345 (11th Cir. 1999), *vacated on other grounds*, 195 F.3d 603 (11th Cir. 1999) (citing *Barefoot*, 463 U.S. at 893-94).

1. The circumstances of Mr. Cromartie's case are extraordinary and Rule 60(b) relief should have been granted.

Here, no court has ever ruled on the merits of Mr. Cromartie's ineffectiveness of counsel claim. Under Rule 60(b)(6), a federal court may grant relief from judgment and reach an otherwise-defaulted claim where a procedural defect prevented the courts from reaching the claims and where extraordinary circumstances exist. The circumstances of Mr. Cromartie's case are extraordinary.

First, Mr. Cromartie's co-defendant, Thaddeus Lucas, recently revealed in an affidavit for the first time – despite Mr. Cromartie's current counsel's diligent efforts to obtain information from him earlier – that he overheard their other co-defendant, Corey Clark, confess to having shot Richard Slysz. This newly available evidence demonstrates Mr. Cromartie's actual innocence within the meaning of *Schlup v. Delo*, 513 U.S. 298 (1995), and provides an equitable exception to AEDPA's statute of limitations under *McQuiggin v. Perkins*, 569 U.S. 383 (2013). This actual innocence gateway claim permits the district court to consider Mr. Cromartie's underlying claim of ineffective assistance of trial counsel at the penalty phase on the merits, as the

only previous barrier to consideration of that claim was the district court's finding that it was untimely. *See Cromartie v. Warden, Ga. Diagnostic & Classification Prison*, No. 7:14-CV-39, 2017 WL 1234139, *36-37 (M.D. Ga. Mar. 31, 2017).

Second, the severity and merits of the underlying constitutional violation militate in favor of relief from judgment. *See Satterfield v. Dist. Att'y Philadelphia*, 872 F.3d 152, 163 (3d Cir. 2017) (citing *Buck v. Davis*, 137 S. Ct. 759 (2017)). In Mr. Cromartie's case, trial counsel conducted only a minimal investigation into mitigating evidence. But for counsel's deficient performance, counsel could have presented powerful mental health mitigation, including that Mr. Cromartie suffers from the devastating effects of a traumatic childhood that involved parental abuse, neglect and violence; that he suffers from Fetal Alcohol Spectrum Disorder, caused by his mother's pre-natal ingestion of alcohol; and that he has multiple neuropsychological impairments. This evidence is comparable to evidence that this Court has found sufficient to establish prejudice from counsel's deficient performance in other cases. *See, e.g.*, *Porter v. McCollum*, 558 U.S. 30, 38–40 (2009) (counsel ineffective for conducting constitutionally inadequate investigation into mitigating evidence); *Rompilla v. Beard*, 545 U.S. 374, 390 (2005) (counsel ineffective for failing to find and follow "a range of mitigation leads"); *Wiggins v. Smith*, 539 U.S. 510, 534–36, (2003) (counsel ineffective for failing to discover and present powerful mitigating evidence of privation and abuse).

Third, Mr. Cromartie's initial federal habeas counsel were themselves conflicted from representing him. During the time of the conflicted representation,

they ineffectively failed to raise the defaulted claim that Mr. Cromartie is now pursuing under Rule 60(b). As a result of that conflict, the meritorious claim of trial counsel ineffectiveness was not raised until it was untimely, and was never heard on the merits.

Fourth, the victim's daughter has publicly asked the prosecution and the Georgia courts to conduct DNA testing on the physical evidence—as Mr. Cromartie has long requested—but the State has steadfastly refused. *See* Letters from Daughter of Mr. Slysz.

2. This Court should grant a stay so that it has time to decide whether evidence not presented previously as the result of counsel's ineffectiveness should be considered new evidence under *McQuiggin*.

The Eleventh Circuit and district court concluded that Mr. Lucas's affidavit was not new reliable evidence under *McQuiggin* because that evidence was supposedly obvious to everyone, but prior counsel simply failed to pursue or present it. *Ray Jefferson Cromartie v. Warden*, No. 19-14457 (11th Cir. Nov. 13, 2019) ("11th Cir. op.") at 3-4; DCO at 7. As the district court put it, Mr. Lucas had asserted that he knew who shot the decedent, and "[t]he only way Lucas could know who shot Slysz is if Clark confessed that he was the shooter." DCO at 7. As far as the lower courts were concerned, Mr. Cromartie's trial and state habeas counsel knew that Mr. Lucas had evidence of a confession by Clark to being the shooter, but never attempted to obtain or present that evidence.[1]

[1] If the lower courts are correct in that assumption, then it cannot be doubted that prior counsel's failure to obtain and present that evidence was ineffective. After all, what evidence would be more exculpatory at trial than evidence that the co-defendant (who pointed the finger squarely at Mr.

The Eleventh Circuit ruled that because prior counsel could have developed and presented evidence that Clark confessed to being the shooter, but failed to do so, the evidence of Clark's confession was not "new." 11th Cir. op. at 3-4.[2] That ruling deepened and hardened an existing circuit split.

In *Reeves v. Fayette SCI*, 897 F.3d 154 (3d Cir. 2018), the court held as follows:

> [W]hen a petitioner asserts ineffective assistance of counsel based on counsel's failure to discover or present to the fact-finder the very exculpatory evidence that demonstrates his actual innocence, such evidence constitutes new evidence for purposes of the *Schlup* actual innocence gateway.

Id. at 164.

The Eleventh Circuit's decision below is irreconcilable with *Reeves*. But the split did not begin when the Eleventh Circuit issued its opinion today. Rather, it has

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Cromartie) had himself confessed to being the shooter? *See Green v. Georgia*, 442 U.S. 95 (1979); *Chambers v. Mississippi*, 410 U.S. 284 (1973). And state habeas counsel also had every incentive to develop evidence as exculpatory as that "Clark confessed he was the shooter." If state habeas counsel failed to develop and present that evidence, that would clearly rise to the level of ineffective assistance of state habeas counsel. Yet state habeas counsel never explored that evidence, even though they confined their limited efforts to obtaining relief from the convictions. This failure by state habeas counsel only compounds their ineffectiveness for not even bothering to investigate a clearly meritorious claim that trial counsel was ineffective with respect to the penalty phase. *See Martinez v. Ryan*, 566 U.S. 1, 9 (2012) (ineffective assistance of state habeas counsel can be equitable basis for overcoming a default). Where it is present, the ineffective assistance of state habeas counsel should militate in favor of a finding that evidence of innocence is new and reliable, just as it can serve as a basis for overcoming a default.

[2] The Eleventh Circuit's ruling creates a vicious cycle that deserves this Court's attention: declining to hear Mr. Cromartie's ineffective assistance of counsel claim owing to a timeliness issue cause by the conflicted ineffective counsel and then declining to hear Mr. Cromartie's claim a second time because the same ineffective counsel was not diligent during trial and state habeas proceedings. Inasmuch as Mr. Cromartie alleges that both trial and state habeas counsel were ineffective, he should not be made to bear the consequences of any lack of diligence on the part of such counsel. *See Martinez v. Ryan*, 566 U.S. 1, 9 (2012) (ineffective assistance of collateral counsel may establish cause for default of a claim of ineffective assistance of trial counsel); *Reeves v. Fayette SCI*, 897 F.3d 154, 164 (3d Cir. 2018) (where counsel ineffectively fails "to discover or present to the fact-finder the very exculpatory evidence that demonstrates his actual innocence, such evidence constitutes new evidence for purposes of the *Schlup* actual innocence gateway.").

deepened and hardened ever since the lower courts began considering innocence claims under *Schlup* and *McQuiggin*. *See generally Reeves*, 897 F.3d at 161-62 & n.6 (observing that "our sister circuit courts are split on whether the evidence must be newly discovered or whether it is sufficient that the evidence was not presented to the fact-finder at trial"). The following courts of appeals agree with the Third Circuit and allow facts not developed by prior ineffective counsel to count as new: *Gomez v. Jaimet*, 350 F.3d 673, 689-90 (7th Cir. 2003); *Griffin v. Johnson*, 350 F.3d 956, 963 (9th Cir. 2003). The Eighth Circuit agrees with the Eleventh Circuit that evidence counts as "new" only if it was "not available at trial." *Amrine v. Bowersox*, 238 F.3d 1023, 1018 (8th Cir. 2001). Three courts of appeals have suggested that newly *presented* evidence can count as new. *See Riva v. Ficco*, 803 F.3d 77, 84 (1st Cir. 2015); *Cleveland v. Bradshaw*, 693 F.3d 626, 633 (6th Cir. 2012); *Rivas v. Fischer*, 687 F.3d 514, 543, 546-47 (2d Cir. 2012). The Fifth Circuit has not taken a clear position, *see Fratta v. Davis*, 889 F.3d 225, 232 (5th Cir. 2018), but has suggested that evidence is not "new" if it could have been discovered by professionally reasonable counsel. *Id.* at 232 n.21.

Thus, there is a live, well-developed conflict among the circuits on this important and recurring issue – one that is appropriate for this Court's certiorari review. Sup. Ct. R. 10(a). This Court should grant a stay so that it has time to seriously consider and resolve the conflict.

3. This Court should grant a stay so that it has time to decide whether a district court may summarily deny for lack of diligence a motion to reopen based on new evidence, where there are disputes of material fact as to diligence.

When a habeas judgment is rendered on procedural grounds, the petitioner may seek to reopen the judgment on a showing of extraordinary circumstances. Fed. R. Civ. P. 60(b)(6); *Buck*, 137 S. Ct. at 778; *Gonzalez*, 545 U.S. at 535. In order for new evidence to act as a gateway to review of otherwise defaulted or time barred claims, the petitioner must show diligence. *McQuiggin*, 569 U.S. at 399. This Court and the lower federal courts have made clear that diligence means "reasonable diligence," not "maximum feasible diligence." *Holland v. Florida*, 560 U.S. 631, 653 (2010) (citations and quotation marks omitted).

Diligence, like the other extraordinary circumstances that can justify reopening a judgment and equitable tolling, is an "'equitable, often fact-intensive' inquiry." *Id.* at 654 (quoting *Gonzalez*, 545 U.S. at 540 (Stevens, J., dissenting)). In ruling that Mr. Cromartie had failed to show diligence (DCO 5-7) without even holding an evidentiary hearing, the district court abused its discretion. *See, e.g.*, *Aron v. United States*, 291 F.3d 708, 715 (11th Cir. 2002) (holding that when a petitioner has "alleged facts regarding his diligence that would entitle him to relief," the district court abuses its discretion if it fails to hold an evidentiary hearing); *Aragon-Llanos v. United States*, 556 F. App'x 826, 829-30 (11th Cir. 2014) (unpublished).

Indeed, the lower courts reviewed, in a matter of hours, what was essentially a cold record and chose to act on an extremely abbreviated schedule. In order to do so, they drew all available inferences against Mr. Cromartie. This was serious error.

In fact, neither the district court nor the Eleventh Circuit really disputed that Mr. Cromartie's *current* counsel have made diligent efforts to obtain information from Mr. Lucas. DCO 6; *cf.* 11th Cir. op. at 4 & n.2; *see also* Declaration of Jessica Johnson (describing current counsel's efforts). Rather, the district court asserted, and the Eleventh Circuit agreed, that Mr. Cromartie lacked diligence during the trial and state habeas proceedings. 11th Cir. op. at 4; DCO 6-7. Even if the ineffective representation of prior conflicted counsel should be held against Mr. Cromartie, which it should not (*see* Section A.2, *supra*), the lower courts' conclusion that those counsel were not diligent is belied by the record.

The record below presents dramatically conflicting allegations and inadequately founded assumptions of material fact respecting diligence, which the lower courts could not properly resolve without a hearing. For example, the district court suggested, based on Mr. Lucas's trial testimony, that trial counsel had to know that Mr. Lucas would say that Clark had admitted to committing the shooting. DCO at 6 ("Lucas testified that Clark told him what happened inside the Junior Food Store, yet no one asked what Clark told him."). But no competent trial lawyer who was aware of such exculpatory evidence would have failed to elicit it.

Rather, the record does not actually support the notion that Mr. Lucas would have testified at trial that Clark confessed to the shooting. First, he did not so testify. Second, he has now attested that he had "not told anyone what Corey said about shooting the clerk because [he] was worried that it would ruin [his] life more than it already has." Lucas Aff., ¶ 5. The district court refused to credit that sworn statement

because Mr. Lucas once told the Parole Board that Clark was the shooter (but without mentioning the source of that information). DCO 5. But a statement to the Parole Board was not a public statement: the Parole Board documents bear the stamp, "Confidential State Secret When Completed." ECF No. 95-1 at 7-10. Indeed, Mr. Lucas was reluctant to testify in the state habeas proceedings and exercised his right to speak to an attorney. ECF No. 21-15 at 31-36. The district court simply assumed that state habeas counsel did not follow up on the opportunity to depose Mr. Lucas out of lack of diligence. DCO 6-7. An equally plausible explanation is that Mr. Lucas was hostile and/or reluctant to talk to state habeas counsel after consulting his own counsel. After all, there is an actual record of Mr. Lucas's continuing reluctance to talk, as attested both by Mr. Lucas himself and by investigator Jessica Johnson. Because Mr. Cromartie's allegations and affidavits "alleged facts regarding his diligence that would entitle him to relief," the district court could not properly resolve these conflicting inferences without conducting an evidentiary hearing. *Aron*, 291 F.3d at 715.[3]

McQuiggin makes clear that diligence is a relevant consideration when a petitioner seeks to reopen judgment on a time-barred claim. *Holland* makes clear that the inquiry into diligence is an equitable, fact-intensive inquiry. But this Court has

[3] The lower courts failed to consider an additional factor demonstrating Mr. Cromartie's diligence – his longstanding, vigorous efforts to obtain DNA testing in these proceedings, as well as in his separate appeal, currently pending in this Court, from the denial of his complaint under 42 U.S.C. § 1983. *See Cromartie v. Shealy*, No. 19-6570. To the extent that there are legitimate doubts about the reliability of Mr. Lucas's evidence, evidentiary development should be ordered, including discovery and DNA testing, so that Mr. Lucas's new evidence can be corroborated or disproved.

not addressed whether or in what circumstances factual development of an innocence gateway claim is required. This Court should grant a stay to decide that issue.

B. Irreparable Injury

Mr. Cromartie's execution is scheduled for 7:00 p.m. this evening, November 13. The death penalty is precisely the type of irreparable harm that must "weigh[] heavily" towards the granting of a stay. *O'Bryan v. Estelle*, 691 F.2d 706, 708 (5th Cir. 1982); *see also Barefoot*, 463 U.S. at 893; *Holladay*, 331 F.3d at 1177 (granting stay in capital case and explaining that the "irreparability of the injury that petitioner will suffer in the absence of a stay [is] self-evident"). In a capital case, a court "must be particularly certain that the legal issues have been sufficiently litigated, and the criminal defendant accorded all the protections guaranteed him by the Constitution of the United States." *O'Bryan*, 691 F.2d at 708 (internal quotation marks omitted (citing *Shaw v. Martin*, 613 F.2d 487, 491 (4th Cir. 1980))). Therefore, a stay is appropriate in a capital case when, as here, the legal issues present "serious questions that can be neither ignored nor brushed aside." *Bundy v. Wainwright*, 808 F.2d 1410, 1422 (11th Cir. 1987).

C. The Stay Will Not Harm the Other Parties

If a stay of execution is granted, "no substantial harm . . . will flow to the State of [Georgia] or its citizens from postponing petitioner's execution to determine whether that execution would violate the Eighth Amendment." *In re Holladay*, 331 F.3d 1169, 1177 (11th Cir. 2003). The reasoning of *Holladay* applies equally here: no substantial harm will flow to the State of Georgia or its citizens from postponing Mr. Cromartie's execution to determine whether, after the discovery of previously

unavailable evidence of innocence, his prior counsel were ineffective in violation of his constitutional rights under the Sixth and Fourteenth Amendments. While the State maintains an interest in enforcing its criminal judgments, the fleeting inconvenience imposed upon the State during a temporary stay of execution is outweighed by the fatal harm to Mr. Cromartie.

D. The Public Interest

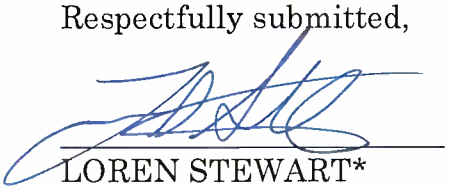
The public interest is "in having a just judgment," *Arizona v. Washington*, 434 U.S. 497, 512 (1978), not simply in having an execution. As the people's representative in capital proceedings, the State of Georgia must yield to this overarching public interest – particularly where a man, like Mr. Cromartie, could be proved innocent. *See Schlup*, 513 U.S. at 324-25 ("The quintessential miscarriage of justice is the execution of a person who is entirely innocent.").

Indeed, even the victim's daughter has written to the District Attorney, Attorney General, and the Supreme Court of Georgia asking that testing be conducted in order to resolve "questions about what happened that night that could be answered by DNA testing" and expressing her view that it is "wrong" that "the State has set a date to execute Mr. Cromartie without doing any testing." *See* Letters from Daughter of Mr. Slysz (Ex. 1). Her efforts in support of DNA testing underscore that the public interest will not be disserved by a stay of execution to resolve the important issues presented herein. Given these stakes, the balance of harms clearly weighs in Mr. Cromartie's favor.

CONCLUSION

For the foregoing reasons, Mr. Cromartie requests that the Court grant his motion for stay of execution pending consideration of his petition for writ of certiorari to the Eleventh Circuit regarding its denial of his appeal.

Respectfully submitted,



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Dated: November 13, 2019

EXHIBIT 1

Mr. Bradfield M. Sheely
District Attorney
P.O. Box 99
Valdosta, GA. 31603-0099

Ms. Sabrina Graham
Senior Assistant Attorney General
40 Capital Square, SW
Atlanta, GA 30334

July 16th 2019

94-CR-328

Re: State v. Ray Jefferson Cromartie

Dear Mr. Sheely and Ms. Graham,

I am writing this letter in support of DNA testing in the case of Georgia versus Ray Cromartie. I was a young woman when my father was murdered at the Junior Food Store in Thomasville.

I've since read a great deal about Ray Cromartie's legal case. There are questions about what happened that night that could be answered by DNA testing. My father's death was senseless. Executing another man would also be senseless, especially if he may

not have what my father.

Thank You very much for your consideration.

Sincerely,

Elizabeth A. Legette
Daughter of Richard Styer

Elizabeth A Legette
July 17th 2019

October 16, 2019

Supreme Court of Georgia
244 Washington Street, SW
Atlanta, GA 30334

To the Justices of the Supreme Court of Georgia,

I am writing to urge you to require DNA testing of the evidence in the case of Ray Cromartie, currently a death row inmate in Georgia. My father, Richard Slysz, was the victim in Mr. Cromartie's case, and I consider myself a victim under Georgia's victim's rights statute and Constitution.

I have read a lot about the case and I believe that there are serious questions about what happened the night my father was murdered and whether Ray Cromartie actually killed him.

This past summer, I contacted the prosecutors in this case and told them that I wanted DNA testing conducted. My letter to them is attached. They never responded to me, but I understand that they opposed the testing.

I still want DNA testing to occur. Today I learned that the State has set a date to execute Mr. Cromartie without doing any testing. This is wrong, and I hope that you will take action to make sure that the testing happens.

Thank you for your consideration.

Sincerely,

Elizabeth A. Legette

Elizabeth A. Legette