

FILED

STATE OF SOUTH CAROLINA) IN THE COURT OF GENERAL SESSIONS
2025 MAY 27 AM 10:10) FOR THE NINTH JUDICIAL CIRCUIT
COUNTY OF BERKELEY) INDICTMENT NO.: 2016-GS-08-2603
LEAH GUERRY DUPREE)
CLERK OF COURT)
STATE OF SOUTH CAROLINA)
BERKELEY COUNTY, SC)

vs.) **MOTION TO PROHIBIT TESTIMONY**
) **OF STATE'S WITNESS**
) **DR. WILLIAM ("BILL") SMOCK**
MICHAEL COLUCCI.)
)
Defendant)

The defendant, by and through undersigned counsel, moves this court to not allow one of the State's anticipated witnesses to testify as an expert under Rule 702, SCRE, unless and until he testifies under oath subject to cross-examination regarding his qualifications and experience. As stated in State v. White, 382 S.C. 265, 270 (2009) and its progeny, Rule 702, SCRE imposes on the trial court an affirmative and meaningful gatekeeping duty to ensure proposed expert testimony meets a reliability threshold for the jury's ultimate consideration.

Upon information and belief, Smock will try to render an opinion regarding the manner of death for which he is unqualified. He is not a forensic pathologist nor a coroner nor a medical examiner, and therefore, lacks the knowledge, skill, experience, training, or education to render an opinion regarding the same. He is a police surgeon practicing clinical medicine which deals with assessing and diagnosing injuries to living alleged victim and should not be allowed to render an opinion as if he were a coroner, medical examiner, or forensic pathologist.

Previously, Smock offered sworn testimony in a prior hearing for this case that he had "performed" autopsies, participated in "thousands" and was previously a "medical examiner." Under Kentucky law, and according to information on the home page of the Kentucky Medical Examiner's website and their public information pamphlet, only a "forensic pathologist" may perform a "coroner-ordered autopsy" or a "post-mortem examination" (See Kentucky Revised Statutes, §72.405(3) and (6)). Furthermore, information directly from the Kentucky Medical Examiner Office, which is statutorily responsible for coroner-ordered autopsies in the state of Kentucky, say, "The Kentucky Medical Examiners are licensed physicians trained in the specialty of **forensic pathology**. ... Kentucky Medical Examiners are highly trained, experienced individuals who perform death investigations by documenting and interpreting medical findings, thus ensuring that death investigations are unbiased, thorough and accurate."

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(emphasis added) (See “Kentucky Medical Examiner, Information for Families pamphlet; and “Team Kentucky” Office of the Medical Examiner webpage (<https://justice.ky.gov/Departments-Agencies/me/pages/default.aspx>) (printouts included herein).

As previously stated, Smock is not a forensic pathologist and does not have the extensive training and experience of a forensic pathologist, and therefore, should not be allowed to render an opinion on the cause or manner of death. Additionally, his false and misleading testimony in a prior hearing in this case proves he clearly lacks the competency to testify as a witness in this case, and pursuant to Rule 601(b)(2), SCRE he should not be allowed to testify in the upcoming retrial of this case. A copy of the relevant pages of the transcript of his testimony is included herein (See lines 15-16, 21-25, pg. 82 and lines 1-15, pg. 83).

Furthermore, according to a forensic pathologist in Kentucky who has known Smock for decades, Smock’s credentials are insufficient to opine on cause and manner of death and he has no authority to sign off on an autopsy report or death certificate regarding these important medicolegal findings – both of which are central issues in Michael Colucci’s case considering as of the filing of this Motion, not one single forensic pathologist or coroner in South Carolina has ruled Sara Colucci’s death a homicide. The only way to ensure Michael Colucci’s constitutional rights mentioned here are protected in the upcoming trial should the State present Smock as a witness is for defense counsel to depose Smock prior to any testimony. Therefore, Michael Colucci, by and through undersigned counsel, respectfully requests the Court Order the State to have William Smock available for deposition in Louisville, Kentucky on May 31, 2025, so he can answer questions relevant to his competency, qualifications, and training.

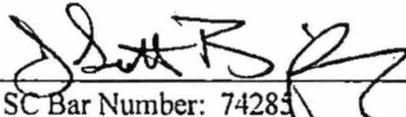
These requests are made pursuant to the South Carolina Rules of Evidence, the rights of Michael Colucci guaranteed by the 6th Amendment: the right of confrontation, the right to present a full and complete defense, and the right of a criminal defendant to have full and competent counsel assist him in trial; the 5th and 14th Amendment right to due process under the United States Constitution; and the rights of a criminal defendant discussed in Davis v. Alaska, 415 U.S. 308 (1974) (the 6th Amendment right of a criminal defendant to impeach a testifying witness with evidence of bias and prejudice).

Respectfully submitted,

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ATTORNEYS FOR MICHAEL COLUCCI

Charleston, South Carolina

May 27, 2025

KRS § 72.405

This document is current through Chapter 5 of the 2024 session.

Michie's™ Kentucky Revised Statutes > TITLE IX Counties, Cities, and Other Local Units (Chs. 65 – 109) > CHAPTER 72 Coroners, Inquests, and Medical Examinations (§§ 72.010 – 72.992) > Kentucky Coroner's Act of 1978 (§§ 72.400 – 72.480)

72.405. Definitions for chapter.

As used in this chapter, unless the context clearly indicates otherwise:

- (1) "Certified coroner" or "certified deputy coroner" means a coroner or deputy coroner who has been certified by the Justice and Public Safety Cabinet to have successfully completed both the basic training course and annual in-service training course required by KRS 72.415, except that a deputy coroner shall be certified without completion of training courses required by KRS 72.415 if he or she is a licensed physician;
- (2) "Coroner's case" means a case in which the coroner has reasonable cause for believing that the death of a human being within his or her county was caused by any of the conditions set forth in KRS 72.025;
- (3) "Coroner-ordered autopsy" means an autopsy ordered by the coroner having jurisdiction and performed by a pathologist pursuant to such authorization in order to ascertain the cause and manner of death in a coroner's case. In the event the pathologist deems it necessary, he or she may submit the appropriate specimen to a qualified chemist or toxicologist for analysis to assist him or her in ascertaining the cause of death in a coroner's case;
- (4) "Genetic tests" means testing for genetic markers for cardiac arrhythmogenic syndromes;
- (5) "Inquest" means an examination ordered by the coroner, or in his or her absence, ordered by a deputy coroner, into the causes and circumstances of any death which is a coroner's case by a jury of six (6) residents of the county impaneled and selected by the coroner to assist him or her in ascertaining the cause and manner of death; and
- (6) "Post-mortem examination" means a physical examination of the body by a medical examiner or by a coroner or deputy coroner who has been certified by the Justice and Public Safety Cabinet and may include an autopsy performed by a pathologist; other appropriate scientific tests administered to determine cause of death, including but not limited to genetic tests; or collection of tissue samples collected pursuant to KRS 213.161(3);

History

Enact. Acts 1978, ch. 93, § 3, effective June 17, 1978; 1982, ch. 195, § 10, effective July 15, 1982; 2007, ch. 85, § 151, effective June 26, 2007; 2020 ch. 126, § 2, effective July 15, 2020; 2023 ch. 162, § 1, effective June 29, 2023.

Annotations

Commentary

Legislative Research Commission Notes

(6/29/2023). 2023 Ky. Acts ch. 162, sec. 4, provides that the amendments to this statute and the creation of KRS 72.222 in 2023 Ky. Acts ch. 162, secs. 1 and 2, may be cited as the Micah Shantell Fletcher Law.

(6/29/2023). Under the authority of KRS 7.136(1), the Reviser of Statutes has renumbered certain subsections in this statute during codification to place the terms in alphabetical order. The words in the text were not changed.

Opinion Notes

Opinions of Attorney General.

Even though a body is not positively identified, the coroner must sign the certificate of death, inasmuch as absolute accuracy, while certainly attained; furthermore the death certificate will represent honest opinions and conclusions based upon the best available evidence from the various sources at the coroner's disposal. OAG 79-74.

Kentucky follows the English rule requiring the coroner in whose jurisdiction the corpse is found to hold the inquest, rather than the common law which placed the duty upon the coroner in the county in which the injury causing death occurred. OAG 79-392.

The coroner is required to sign the death certificate in coroner's cases. OAG 79-392.

Where a man who had a car accident was taken by ambulance to a hospital then transferred to another hospital at which he had earlier undergone both surgery and treatment for drinking, died the next day and was listed as having died from cardio pulmonary arrest due to chronic liver disease from alcohol abuse, with no mention of the injuries, it was up to the coroner to determine whether conditions existed authorizing the holding of an inquest and the question of whether or not the coroner abused his discretion in refusing to conduct an inquest is for the courts to determine. OAG 79-392.

Where a corpse was found floating in the Ohio River adjacent to Greenup County, the question whether the Greenup County coroner or an Ohio coroner would have jurisdiction would hinge on whether there was reason to believe that the death occurred in Greenup County, and the state line is, for this purpose, also the county line; but, although that line is the "low water mark" on the northerly side of the Ohio River, there is presently a dispute over whether that is the low water

line as of 1792, or the low water line as it exists from time to time, which point is unsettled. OAG 79-430.

Under the broad term "reasonable cause," the coroner may hold an inquest upon the request of any responsible citizen, provided that such citizen furnishes the coroner with sufficient information to place the case under the "reasonable - cause - for - believing - in - unnatural - death" concept; however, the mere request of a responsible citizen, standing alone, would not be sufficient to make a coroner's case under subsection (2) of this section. Thus, if a responsible citizen, who furnishes some indication of belief that death was other than a natural one, and that it occurred in the subject coroner's county, requests and inquest, the request involves a "coroner's case" and should be honored. OAG 82-120.

A deputy coroner, where authorized by the coroner or in the coroner's absence, may collect medical specimens or articles which may, in his opinion, be helpful in establishing the cause of death, since although the phrase "or his deputy" was deleted from KRS 72.020(2) by the 1982 amendment, subsection (3) of this section as amended in 1982, remains intact as it read before the amendment, and provides that an "inquest" is an examination ordered by the coroner, or in his absence, ordered by a deputy coroner, into the causes and circumstances of any death which is a coroner's case. It would seem absurd that a deputy, filling in for a coroner, can order an inquest, but could not collect medical specimens relating to the death case. OAG 82-376.

The legislature intended, as a means of properly enforcing the clear implications of KRS 72.020 relating to the 12 grounds for a post-mortem, to enlarge the jurisdiction of the court in KRS 72.445 to offer a court the alternatives of either ordering a post-mortem exam, to be conducted by a medical examiner or by a certified coroner or deputy, or of ordering an autopsy to be conducted by a pathologist. OAG 82-376.

Under KRS 72.020(4), where the law enforcement officer at the scene has probable cause to believe that one of the 12 (now 19) conditions mentioned in KRS 72.025 exists and the coroner refuses to require a post-mortem, the officer should notify the county or commonwealth's attorney who can petition the district or circuit court of jurisdiction to order a post-mortem examination of the body (to be conducted by a medical examiner or by a certified coroner or deputy coroner) or the court may order an autopsy to be conducted by a pathologist. OAG 82-376.

There is no statute giving the coroner the authority to control the giving out of information relating to human deaths generally; the occasion for the coroner's exercise of discretion as to the giving out of information relating to such deaths would only arise in connection with information obtained through the coroner's exercise of jurisdiction by way of a coroner ordered autopsy, a coroner's case, or inquest. OAG 83-223.

Where a coroner begins to investigate a death defined by this section as a "coroner's case," his work and jurisdiction should not be interfered with by other peace officers; however, the coroner's investigation of possible crime does not rule out criminal investigation by other peace officers, provided the work and jurisdiction of the coroner in a coroner's case is not interfered with or inhibited in any substantial way. OAG 83-229.

A coroner cannot order the county ambulance service to transport the remains to a facility for the purpose of having an autopsy performed. OAG 83-434.

Section 100 of the Kentucky Constitution provides certain qualifications for coroners, and the rule is well established that the legislature cannot impose additional qualifications where the Constitution enumerates certain qualifications for a constitutional office; thus, where a coroner meets the qualifications stated in Ky. Const., § 100, he is eligible to serve in that office. In view of the fact, however, that the certification requirements of subsection (5) of this section and KRS 72.415 narrowly relate to the coroner's personally conducting a postmortem examination and do not extend to the coroner's eligibility to hold his office, the certification requirements for coroners are constitutional. OAG 84-355.

Since the subjects contained in the basic training course for coroners and their deputies are designed to enable coroners and deputy coroners to better carry out their function of conducting post-mortem examinations, under the clear language of subsections (4) and (5) of this section, no coroner can personally conduct a postmortem, as required by KRS 72.025, where such coroner has not been certified by the Department of Justice. OAG 84-355.

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Office of the State Medical Examiner

Office of the Medical Examiner



Recognized as
national leaders in
their respective fields,
the scientific staff
members of the
Kentucky Office of the
Medical Examiner

assist Kentucky coroners and law enforcement
agencies in all aspects of death investigation.
Central to the role of the office is the
performance of the forensic autopsy, to aid in
the determination of cause and manner of death
of individuals, and identification of the
deceased.

Forensic pathologists annually conduct around
2,500 forensic autopsy examinations at the three
regional offices, located in Louisville, Frankfort,
and Madisonville.

Forensic pathologists are medical doctors who
have undertaken at least 5 years of post-
graduate training to become proficient in the
subspecialty of forensic pathology.

A forensic pathologist is available to coroners
for consultation 24 hours a day, every day of the
year. Post-mortem examinations are conducted
around the state 365 days a year. The mission



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Bill Ralston
Chief Medical
Examiner

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statement of the Kentucky Medical Examiners
Office is to serve the public by:

- providing accurate, thorough, and efficient medicolegal investigations of death, thereby
- ensuring justice, and
- providing solace, comfort, and protection to the living.

More information about forensic pathology and death investigation may be found at www.aafs.org (<http://www.aafs.org/>) and www.thename.org (<http://www.thename.org/>).

Information regarding Kentucky Coroners and the Kentucky Coroners Association may be found on their Facebook (<https://www.facebook.com/KYCoroners>) page.

Commonwealth of Kentucky/Kentucky Justice & Public Safety Cabinet
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Kentucky.gov (<http://www.kentucky.gov>)

What do I do next when a loved one dies?

The first thing you need to do is to take care of yourself. You will need to make several decisions. Here are a few suggestions to help guide you and your loved ones through the process.

- 1) Involve your family, friends and clergy for support and comfort. They will assist you in making sense of this tragic and sometimes sudden news.
- 2) Select a funeral home to help you make funeral arrangements and coordinate final disposition of your loved one's remains. If you don't know where to turn, you can call a variety of funeral homes, ask questions and obtain pricing. Any funeral home can assist with cremation.
- 3) Once you have chosen a funeral home, the funeral director will make arrangements to pick up and transport your loved one's remains back to the funeral home following the autopsy.
- 4) Keep track of all business cards given to you by law enforcement, county coroner, ambulance, and funeral home personnel.
- 5) Start a file or folder to correlate all paperwork and information that will be shared with you as a result of your loved one's death.
- 6) Finally—remember to check in on yourself. Stress can come into one's life quickly and unexpectedly. Don't be afraid to use resources available to you in your community.

We hope the information in this brochure is helpful for you and your family. If we can be of any assistance, please contact us at the phone number on the back of this brochure. The Louisville Office hours are 7:30 a.m. to 4:00 p.m. Monday through Friday.

Tracey Corey, M.D.
Kentucky Chief Medical Examiner

Kentucky Office of the Chief Medical Examiner
810 Barret Avenue
Louisville, KY 40204



Kentucky Medical Examiner

INFORMATION FOR FAMILIES

The death of a loved one can cause tremendous stress and sorrow. We hope this brochure will assist you during the grieving process and help answer questions about the autopsy process and the role of the Medical Examiner.

What does the Kentucky Medical Examiner do?

The Kentucky Medical Examiner provides death investigation services and forensic autopsy services for deaths that occur in Kentucky when authorized by County Coroners or the Court. All deaths that are sudden or unexpected or occur from other than natural causes must be reported to the County Coroner, who then may authorize a postmortem examination by the Kentucky Medical Examiner's Office.

Our goal is to assist county coroners, families, law enforcement agencies and the legal system by determining a scientifically unbiased and logical cause and manner of death. The information gathered during a forensic death investigation and autopsy can be critical in civil or criminal court cases. Even in straightforward natural deaths, information from the death investigation or autopsy may help surviving family members protect their own health. This brochure will provide answers to guide you when a loved one dies.

What is a Medical Examiner (and a Medical Examiner Investigation)?

The Kentucky Medical Examiners are licensed physicians trained in the specialty of forensic pathology. The Kentucky Medical Examiner is an independent entity and does not work for the Commonwealth Attorney, Coroner's Office, or any law enforcement agency.

Kentucky Medical Examiners are highly trained, experienced individuals who perform death investigations by documenting and interpreting medical findings, thus ensuring that death investigations are unbiased, thorough and accurate. Kentucky County Coroners and law enforcement investigators may ask you many questions that will help to find answers about how and why your loved one died.

- 1 A. In Kentucky and Indiana.
- 2 Q. Are you a member of any professional
3 groups or association?
- 4 A. Yes, sir, I am.
- 5 Q. Have you been published?
- 6 A. Yes, sir.
- 7 Q. And textbooks?
- 8 A. I have edited three textbooks on
9 forensic medicine and published more than 40
10 articles and chapters on forensic and emergency
11 medicine.
- 12 Q. Were these in peer-reviewed
13 publications?
- 14 A. Yes, sir, they are.
- 15 Q. Have you performed any autopsies?
- 16 A. Yes, sir.
- 17 Q. Let me rewire for a second. Have you
18 published protocols for physicians on how to care
19 and treat victims of strangulation?
- 20 A. Yes, sir, I have.
- 21 Q. Now. Let's go back. Have you ever
22 perform any autopsies?
- 23 A. Yes, sir. During medical school I was
24 diener for the Kentucky Medical Examiners. The
25 diener is the individual who actually makes the

1 incisions, performs the autopsy, and takes the
2 organs out, and gives them to the forensic
3 pathologist for the additional dissection.

4 Q. How many autopsies have you
5 participated in?

6 A. Thousands.

7 Q. Were you ever a medical examiner?

8 A. Yes, sir. The Kentucky Medical
9 Examiners Office from 1990 on, there was the first
10 program of applying that clinical forensic
11 medicine. We had a staff of forensic nurses who at
12 the request of law enforcement would do living
13 forensic exams. I was employed by the Kentucky
14 Medical Examiners Office as a medical examiner from
15 2000 -- from 2000 -- or 1991 through '97.

16 Q. As part of your training have you
17 studied strangulation in living and nonliving
18 victims?

19 A. Yes, sir, I have.

20 Q. How many years?

21 A. Since 1984. So that's more than 30
22 years.

23 Q. Do you currently teach the
24 investigation and prosecution of felony
25 strangulations?

DEFENSE MAY 28, 2025 PRETRIAL HEARING MEMORANDUM

STATE v. MICHAEL COLUCCI

Parties:

Defendant: Michael Colucci
Alleged Victim: Sara Lynn Colucci
Counsel for Defense: J. Scott Bischoff, II
William S. McGuire
Andrew J. Savage, III
Counsel for State: Joel A. Kozak
Kinli B. Abee

FILED
2025 MAY 27 AM 10:09
LEAH GUERRY DUPREE
CLERK OF COURT
BERKELEY COUNTY, SC

History:

Date of Incident: May 20, 2015
Date of Arrest: May 4, 2016
Charge/Statute: Murder (SC Code §16-3-10)
Berkeley County Indictment Number 2016-GS-08-2603

Incident:

Summary: Michael Colucci is charged with Murder (Indictment Number 2016-GS-08-2603) alleging that he murdered his wife, Sara Lynn Colucci, on May 20, 2015. Colucci denies any wrongdoing and believes his wife died by accident or suicide.

The trial of this case set to begin June 16, 2025, is a retrial from the first trial which began November 26, 2018, and ended in a mistrial December 6, 2018. Upon information and belief via statements from jurors, the jury acquitted Michael Colucci of Murder and voted 10-2 for acquittal on the lesser charge of Voluntary Manslaughter before the Court declared a mistrial.

Location: 2206 North Main Street, Summerville, SC

Michael and Sara Lynn Colucci operated a business, The Gold Standard, at this location. Sara Lynn's longtime friend, Phillip Davis, lived at the location but was not there when Sara Lynn died. The building was owned and leased to the Colucci's by Al Bailey.

Time of Incident: Michael called 911 as soon as he was aware his wife was tangled up and hanging in the loop of an industrial hose at the property. That call was made at 7:12 pm on May 20, 2015, about one hour before the sun set that evening.

Eyewitnesses to Incident: None

I.

Facts

On May 20, 2015, Michael and Sara Lynn Colucci stopped at their warehouse located at 2206 North Main Street in Summerville, SC on their way home from downtown Charleston so Sara Lynn could use the restroom. At approximately 7:13 p.m., Michael called 911 to report that he had found his wife tangled up and hanging in an industrial water hose and he was attempting CPR. First Responders included Berkeley County EMS, Pine Ridge Fire Department and the Berkeley County Sheriff's Office. Michael was detained, interviewed and photographed by law enforcement at the scene. Crime Scene Detective Kokinda processed the scene and took photographs, including photographs inside Michael's vehicle. Some of the evidence collected included a portion of the hose, strands of hair that were later identified as Sara Lynn's, DNA from the hose later identified as Sara Lynn's, as well as damaged sunglasses and a loose fingernail in the couple's vehicle. Sara Lynn's body was sent to MUSC for autopsy. Law enforcement also seized the cell phones of both Michael and Sara Lynn Colucci and attempted a download. A Cellebrite forensic report was formulated for both phones. A second download on both phones was performed in 2024 to capture GPS location data, but the State was able to recover GPS location data from Sara Lynn's cell phone.

Dr. Lee Marie Tormos, a forensic pathologist with MUSC, performed an autopsy on Sara Lynn Colucci's body and signed a final report on June 24, 2015, after receiving the toxicology report, which showed the presence of alprazolam and cocaine metabolites and a blood alcohol level of approximately 0.23. A staff meeting was held the same day with Drs. Tormos, Batalis, Reemer and Presnell. On April 12, 2016, Dr. Tormos visited the crime scene with SLED agents and members from the Berkeley County Coroner Office, including Assistant Coroner Darnell Hartwell. On May 2, 2016, Special Agent David Owen forwarded Deputy Solicitor Anne Williams some of his investigative file for Dr. Presnell's review. On May 4, 2016, a second staff meeting was held at MUSC about this case. An email from Dr. Presnell documents what was discussed during the meeting. As of today, Dr. Tormos' autopsy report has not changed and still lists the cause of death as "asphyxia by neck compression" and the manner of death as "undetermined." Not a single forensic pathologist has officially determined the manner of death is a "homicide."

The initial death certificate issued by the Berkeley County Coroner on June 23, 2015, listed the manner of death as "Pending Investigation." The second death certificate issued by the Berkeley

County Coroner on July 27, 2015, lists the manner of death as "Could not be determined." A third death certificate was issued by the Berkeley County Coroner on January 13, 2016, though no information was changed.

On July 31, 2015, the Berkeley County Sheriff's Office referred the case to SLED and Agent David Owen was assigned the case. On May 4, 2016, Michael was arrested by SLED and charged with Murder. After the Ninth Circuit Solicitor's Office declined prosecution, the Attorney General's Office assumed the prosecution.

II.

May 28, 2025 Pretrial Hearing Issues for the Court: The State's Pre-trial Motions

1. Motion to Limit Testimony of Prior Suicidal Ideations by Decedent

The prosecution has asked this Court to not allow evidence of the alleged victim's suicidal ideation. Specifically, the alleged victim's statement that she wanted to hang herself. That statement was made a week or so before the alleged victim died under circumstances suggesting that she hung herself- possibly on purpose and in a very depressed state revolving around the anniversary of her previous husband's death.

Evidence of these matters is relevant, probative, and the issues are inseparable.

2. Motion to Exclude Reference or Argument to Decedent's Prior Drug and/or Alcohol Use

The prosecution has asked the court to not allow the introduction of evidence regarding the alleged victim's acute, and long-term abuse of alcohol and drugs that appear to be an attempt at self-medication to treat acute depression caused, at least in large part, by her grieving her previous husband's death.

From the Defense perspective, evidence of these matters is relevant, probative, and the issues are inseparable.

3. State's Motion in Limine to Prevent the Defense from Referencing the Surrounding Circumstances of Michael Viera's Death

The prosecution has also asked the court to not allow evidence of the facts surrounding the death of the alleged victim's previous husband. The alleged victim's husband stabbed himself to death after "having words" with the alleged victim in a telephone conversation. The alleged victim has stated that she feels responsible for her previous husband's death.

From the Defense perspective, evidence of these matters is relevant, probative, and the issues are inseparable.

4. State's Motion for an Instruction Regarding the Damaged Necklace

On the night Sara Lynn died, she was wearing a gold herringbone necklace that is prominently seen in pictures taken at the scene by Berkeley County Sheriff's Office, as well as by members of Dr. Tormos' staff at MUSC during the autopsy. During the first trial, one of the State's experts, Dr. William ("Bill") Smock, who is not a forensic pathologist but nevertheless testified regarding his opinion that the gold herringbone necklace Sara Lynn was wearing the night she died was the ligature Michael Colucci used to murder his wife. During cross-examination by defense counsel Andy Savage, the necklace's original, undisturbed condition was altered when Mr. Savage demonstrably pulled on both ends of the necklace while simultaneously asking Dr. Smock to show the jury exactly how this necklace was purportedly used as a murder weapon.

In its Motion for an Instruction, the prosecution has asked the court to proactively comment on the facts via an instruction to the jury that the government is not responsible for the current condition of the necklace, and they have asked the court to additionally instruct the jury they are to draw no inferences or conclusions based on the current condition of the necklace.

From the Defense perspective, it would be improper for the Court to proactively instruct the jury on this issue because the altered condition of the necklace that occurred during the first trial of this case is not relevant until testimony of a witness makes it relevant. The State has pictures of the necklace at the scene and from the autopsy that it can use to prove the condition of the necklace at the time of Sara Lynn's death, and the State would suffer no prejudice if it was limited to only using these pictures.

5. Motion to Admit Statements Pursuant to Jackson v. Denno and Rule 801(d)(2),
SCRE

The prosecution has also filed a motion for admission of statements made by Michael Colucci to first responders who were on-scene the night of Sara Lynn's death. According to the prosecution, they will have the following witnesses present for the hearing on May 28, 2025:

- a. Joseph Etling, Pine Ridge Fire Department
- b. Bobby Shuler, Berkeley County Sheriff's Office
- c. William Kimbro, Berkeley County Sheriff's Office
- d. Brooks Barlow, former Berkeley County Sheriff's Office

Additionally, two Berkeley County EMS employees, Christina Wheeler and Jenny Ratajczack, were originally on the State's list of witnesses for the hearing, but after informing the Defense they did not plan to present them for testimony at the hearing, the Defense subpoenaed both earlier this week.

III.

May 28, 2025 Pretrial Hearing Issues for the Court: The Defense Response to the State's Pre-trial Motions

Summary

Regarding the manner of Sara Lynn's death, there is significant evidence indicating that Sara Lynn died by hanging – either accidental or as an act of suicide. After leaving the gravesite of her previous husband, and while driving towards their home on the day of her death, Sarah Lynn instructed her husband, Michael Colucci, to stop by a business that Michael owned, the Gold Standard, so that she could urinate. Sara Lynn was drinking heavily that day (approximately 0.23 BAC reported in a postmortem toxicology screening) and attempted to enter the business property by squeezing through a gap between the building and a metal fence pole where a large industrial hose was hanging. Whether by accident or by design, there is evidence that Sara Lynn ended up hanging herself in the hose loop. Sara Lynn's DNA was found in the hose loop and a single strand of her hair was found on the upper part of the hose. A well-respected South Carolina pathologist who examined the body has testified that Sara Lynn's injuries are consistent with a hanging and are not consistent with a homicidal manual or ligature strangulation.

A week or so before her death, Sara Lynn's mother, Barbara Moore, stopped by her house in the afternoon and found her drinking alone in the garage and crying. Sara Lynn told her mother that if it was not for the girls coming home, I'd "hang myself" now in this garage. The prosecution provided evidence of this statement to the defense in February of 2023, but failed to tell the Defense about this statement prior to the first trial in November 2018.

During the first trial, the lead prosecutor, who is no longer involved in the prosecution of this case, asked Barbara to describe for the jury Sara Lynn's emotional state of mind during this interaction, but also instructed the mother to refrain from stating what Sara Lynn had said about wanting to hang herself. As a result, the jury did not hear that Sara Lynn stated she was contemplating suicide by hanging herself a week or so before she was found dead under circumstances suggesting that she may have hung herself. At the first trial, the prosecution specifically instructed Barbara Moore to not tell the jury about Sara Lynn's statement regarding suicide by hanging. Now, the prosecution still wishes to keep Sara Lynn's relevant and probative statement regarding suicidal ideation – by hanging herself – from the jury.

Additionally, text messages between Sara Lynn and Michael indicate that Sara Lynn's statement to her mother that she was going to hang herself occurred just eight days before Sara Lynn's death on May 20, 2015. On May 12, 2015, Sara Lynn sends Michael Colucci text messages indicating that she is going to check herself in to Palmetto Lowcountry Behavioral Health; that she is planning on shooting herself in the woods; and texts "goodbye" to Michael after texting him "Love you." These messages are likely sent the same day her mother found Sara Lynn depressed, drinking

alone, and crying at home in the afternoon. It's indisputable this evidence of suicidal ideation as recent as just eight days before her death is relevant to the possibility that her death was a suicide.

Regarding Sara Lynn's depression, it was more significant and acute with each passing year during the month of May. Her previous husband died on May 18, 2007, and the two were married on May 20, 2000. Sara Lynn died on May 20, 2015. Her previous husband died tragically by stabbing himself to death after being with a group of friends. They were doing "mushrooms" and under the influence of psilocybin. His post-mortem toxicology also showed LSD and marijuana metabolite in his blood. Following a phone call and conversation with Sara Lynn, he walked away from the group of friends and stabbed himself 26 times later that evening. He was found around 5:30am dead in the roadway near his home by a delivery driver. Sara Lynn repeatedly relives this tragic experience through text messages, including one sent to her longtime close friend on May 18, 2015, just two days before she died. Most importantly, Sara Lynn has said that she feels responsible for her previous husband's death. While she never revealed what she said to her previous husband, she felt that her words caused him to leave his group of friends and use a knife to stab himself 26 times.

Sara Lynn would become so depressed during the month of May that she would often have the kids, Bishop and Milan, stay overnight with other people so that they did not have to see her debilitating depression during this time of the year. There is evidence that, on some days, Sara Lynn did not have the emotional energy to get out of bed, shower, take the kids to school, help with the businesses, work, keep the house clean, or even abstain from abusing alcohol and drugs because of her debilitating depression over the death of her second husband. Sara Lynn told others why the month of May was so hard for her to bear. All of this is well documented in her text messages to people she interacted with around this time on a regular basis, yet the prosecution wishes to keep the cause of Sara Lynn's acute and crippling depressive episodes – the guilt and details of her former husband's tragic death, her alcoholism, her substance abuse – from the jury, whether in the month of May when it was the worst or during other times of the year leading up to her death.

The prosecution has asked the court to not allow evidence of Sara Lynn's drug and alcohol abuse, aside from what occurred on the day of her death. There is evidence of the alleged victim's depression and her self-medication with the abuse of various drugs in her own text messages extracted from the State's forensic download of her cell phone. Evidence of Sara Lynn's chronic alcohol abuse comes from a testifying witness for the state, Sara Lynn's own mother, Barbara Moore, who previously testified regarding Sara Lynn's excessive drinking. Specifically, Barbara Moore went to Sara Lynn's home during the afternoon and found Sara Lynn drinking alone and crying to the point having a swollen and puffy face days before her death. Barbara Moore testified drinking contributed to this acutely depressed state, and it was the culmination of Sara Lynn's long-term pattern of drunkenness and depression that caused her mother that very day to be so concerned regarding Sara Lynn's health. Barbara wanted to take Sara Lynn to the hospital for help. She even offered to pay for it to make sure that Sara Lynn got the professional help she needed.

Sara Lynn's efforts to self-medicate her depression with the abuse of drugs and alcohol are manifestations of the intensity of her depression – and the potential desire to hang herself. These issues are relevant, probative, and are inseparable.

At the time of her death, Sara Lynn had a diagnosed major depressive disorder and was being treated for depression by a local psychiatrist who first diagnosed her in 2009 specifically on account of the mental health struggles she was experiencing over the death of her second husband. The psychiatrist then began prescribing medication to Sara Lynn for the next few years leading up to her death. There is evidence that Sara Lynn tried to reach her psychiatrist twice, by phone, on the day of her death. There is also evidence that Sara Lynn was self-medicating her depression with not only alcohol and misuse of prescription drugs, but also illicit drugs, as especially revealed through her post-mortem toxicology report that shows Sara Lynn had been using cocaine, Xanax, and alcohol before her death. It is clear highly relevant evidence exists regarding Sara Lynn's long-time efforts at self-medicating her depression, and despite the State's request to prohibit the jury one more time from hearing the facts regarding Sara Lynn's daily behavior, the court should allow the jury to make up its own mind regarding its significance as it relates to her death.

All this evidence regarding her drug and alcohol use for many months prior to her death is relevant, probative, and admissible to show the alleged victim's long term major depression. The details of her feelings as expressed to multiple people regarding the tragic loss of her second husband explains why Sara Lynn's bouts of depression would peak and intensify during the month of May, while also present in her thoughts throughout the other times of the year as documented in dozens of text messages to people she communicated with during the months leading up to her death.

Furthermore, all this evidence regarding her depression, what caused her depression, and her drug and alcohol use to mitigate her depression is also relevant, probative, and admissible to impeach the integrity of the investigation conducted by law enforcement. Law enforcement investigators chose to keep quiet this significant amount of evidence regarding Sara Lynn's suicidal ideation, her long-term depression, how that depression intensified, why it intensified, and why she may have acted on those ideations on May 20th. Neither the forensic pathologist who performed the autopsy nor the coroner were informed by law enforcement of Sara Lynn's acute depression and how it was most intense during the month of May, nor were they informed of her multiple suicidal statements prior to her death, especially her statement to her own mother eight days before her death that she was going to hang herself. It appears law enforcement made a conscious decision to keep quiet all evidence supporting or relevant to Sara Lynn's death being a suicide and only advanced information that could possibly support a theory of homicide, such as misleadingly telling the forensic pathologist that the alleged victim was in a positive state of mind at the time of her death because she was very much looking forward to her daughter's graduation from 5th grade despite contrary evidence.

This one-sided, lopsided, and inaccurate presentation of mental health evidence to the forensic pathologist and coroner is evidence of a biased investigation. This inaccurate, and misleading,

presentation of mental health evidence suggests that this investigation was not a search for the truth. Instead, the misleading and inaccurate presentation of mental health evidence to the forensic pathologist and coroner supports the argument the goal throughout this investigation was to build a prosecution against Michael Colucci.

Applicable Law Regarding the Defendant's Responses to State's Pre-trial Motions

1. Motion to Limit Testimony of Decedent's Suicidal Ideation

The State seeks to exclude a key statement made by the decedent—her expressed desire to hang herself, made directly to her mother just days before her death. This is not hearsay under Rule 803(3), SCRE, as it demonstrates her then-existing emotional and mental condition, central to the issue of manner of death.

See Dove v. State, 337 S.C. 298, 303 (1999) (holding PCR petitioner was prejudiced when his attorney failed to obtain and present “relevant and important evidence supporting the assertion that his wife committed suicide ... [because he] could have used the medical records to challenge the testimony of the mother that her daughter never had suicidal thoughts. The State’s case consisted entirely of circumstantial evidence and, while the State’s theory was plausible, petitioner’s suicide theory was also plausible.”)

Broadly limiting the defense’s opportunity for cross-examination as requested in this specific Motion would also violate Michael Colucci’s Sixth Amendment right of confrontation and Fifth Amendment and Fourteenth Amendment right to due process. The holding and application of Kyles v. Whitley, 514 U.S. 419 (1995) makes clear the State’s investigators may not put their proverbial heads in the sand, fail to conduct a thorough investigation, and then be able to claim lack of knowledge of certain information that diminishes the strength of their theory of the case. The Court should deny this Motion at this time.

2. Motion to Exclude Reference to Drug and Alcohol Abuse

The decedent’s history of substance abuse is not only relevant under Rules 401, 402, SCRE, it is not prohibited by Rule 403, SCRE.

Broadly limiting the defense’s opportunity for cross-examination as requested in this specific Motion would violate Michael Colucci’s Sixth Amendment right of confrontation and Fifth Amendment and Fourteenth Amendment right to due process. The holding and application of Kyles v. Whitley makes clear the State’s investigators may not put their proverbial heads in the sand, fail to conduct a thorough investigation, and then be able to claim lack of knowledge of certain information that diminishes the strength of their theory of the case. The Court should deny this Motion at this time.

3. Motion to Exclude Circumstances of Prior Husband's Death

Evidence concerning the decedent’s prior husband’s suicide—and her deep psychological response—is admissible not only as Rule 803(3) mental state evidence.

Broadly limiting the defense's opportunity for cross-examination as requested in this specific Motion would violate Michael Colucci's Sixth Amendment right of confrontation and Fifth Amendment and Fourteenth Amendment right to due process. The holding and application of Kyles v. Whitley makes clear the State's investigators may not put their proverbial heads in the sand, fail to conduct a thorough investigation, and then be able to claim lack of knowledge of certain information that diminishes the strength of their theory of the case. The Court should deny this Motion at this time.

4. Motion for Jury Instruction Regarding the Necklace

The Court should deny the State's Motion to proactively give the jury an instruction regarding the current condition of the necklace that was altered during the last trial. Any comment or formal steps by the Court to proactively bring an issue to the attention of the jury in the absence of testimony regarding the same would be improper.

Should, however, the State decide to make the current condition of the necklace relevant through testimony, the Court should consider simply allowing the jury to reach their own conclusions independent of judicial influence by watching video from the past trial that shows exactly what occurred when the necklace was altered. Granting the State's Motion would unfairly limit the defense's opportunity for cross-examination and would violate Michael Colucci's Sixth Amendment right of confrontation and Fifth Amendment and Fourteenth Amendment right to due process.

5. Jackson v. Denno Motion

The Defense reserves the right to present argument regarding issues that are relevant to this Motion until after testimony at the May 28, 2025 pre-trial hearing.

IV.

Conclusion

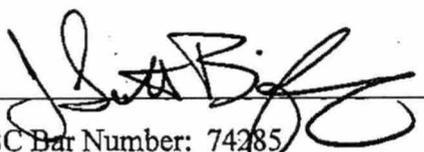
In summary, the evidence of Sara Lynn's depression, suicidal ideation, illicit substance abuse, alcoholism, and guilt over the death of her second husband all serve dual purposes: it is substantively admissible under the Rules of Evidence and, based on testimony from the last trial, likely will be independently admissible to contradict the State's evidence. The State's witnesses have previously presented partial, inconsistent, or misleading accounts regarding Sara Lynn Colucci. Exclusion of this information under the guise of prejudice or relevance would mislead the jury regarding the true circumstances surrounding this incident and Sara Lynn's death.

The following supportive documents are attached to this Memorandum:

1. South Carolina Attorney General's Office Investigator Matt Ellis memo dated 2/16/23 regarding statement of Barbara Moore that Sara Lynn Colucci told her she was going to hang herself approximately two weeks before her death (1 page);

2. Copy of a portion of the transcript from Barbara Moore's testimony during the first trial (4 pages);
3. Copy of a page from the forensic download file of Sara Lynn Colucci's phone showing suicidal text messages to Michael Colucci on 5/12/15 (1 page);
4. Copy of pages from the forensic download file of Sara Lynn Colucci's phone showing texts to her longtime friend regarding the anniversary of her second husband's tragic death (3 pages);
5. Post-mortem toxicology report for Sara Lynn Colucci showing cocaine metabolite, alprazolam metabolite and alcohol in her blood at the time of her death (5 pages);
6. Letter from Sara Lynn Colucci's treating psychiatrist regarding her multiple diagnoses prior to her death (1 page); and
7. Death certificate of Michael Vieira dated 9/28/07 showing the following Cause of Death: multiple stab wounds to chest and abdomen with massive hemorrhage (1 page).

Respectfully submitted,



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ATTORNEYS FOR MICHAEL COLUCCI

Charleston, South Carolina
May 23, 2025

MEMORANDUM

TO: Michael Colucci Investigation (2016-2666)
FROM: Matt Ellis, Special Investigator *(ma)*
RE: Barbara Moore- 02/16/2023

The South Carolina Attorney General's Office met with Barbara Moore on 02/16/2023 in reference to the upcoming March 6, 2023, trial date. During this meeting Barbara stated approximately two weeks before this incident, she went over to Michael and Sara's home and found her in the garage. Sara was upset and crying and told Barbara if it wasn't for the kids, she would have hung herself in the garage. Barbara told Michael they needed to take her to the hospital and Barbara would pay for it, but Michael told her that he would take care of Sara.

1 Automobile wreck? What happened? I think he may
2 have said there was an accident. And I said, how?
3 What happened? What happened? And he said she
4 hung herself. And I just dropped the phone. I had
5 two little girls and I had to stay very composed;
6 they were in the den. And I just dropped the
7 phone.

8 Q. Do you need a minute?

9 THE COURT: How about some water,
10 please.

11 (Brief pause.)

12 Q. Okay. Had you started going to see
13 Sara or going to the house on Wednesday?

14 A. I had visited the house two weeks
15 before quite a lot. And two weeks before Sara Lynn
16 died I came home on a Wednesday and went buy to see
17 her.

18 Q. Was that just to go visit?

19 A. I just wanted to go see her and.

20 Q. How was she acting?

21 A. She was very upset.

22 Q. Where did you see her in the house?

23 A. In the den. They had -- they turned
24 the the garage into like a den. And that's where
25 she was at. And I came -- when I got there Michael

1 was not there. And so I went in. The door was
2 unlocked and I went in. And I went into the garage
3 to see her. And --

4 Q. What was her demeanor?

5 A. She had cried until her face was
6 swollen. And I said, honey, what is the matter.
7 And she was sitting in the chair.

8 Q. Let's not say anything that she said.

9 A. Okay.

10 Q. It's okay. Take a minute.

11 Just describe how she was acting? Did
12 she appear to be upset? Was she happy?

13 A. She was very upset. She was crying her
14 face was swollen.

15 Q. Did you get an understanding in that
16 interaction of what was upsetting her?

17 A. I did not. I said, what is the matter
18 and she said --

19 Q. Don't say anything that she said?

20 A. Okay.

21 Q. So following this interaction with her,
22 did you -- how did you feel?

23 A. I was very concerned. I felt like that
24 Sara needed to go -- she needed some help because
25 -- and I felt it was her drinking. I really did.

1 There was an open beer can on the table beside her
2 and.

3 Q. You wanted to get her help?

4 A. I wanted to take her to the hospital
5 because I felt like she needed help.

6 Q. Okay.

7 A. The drinking, she need alcoholic help
8 and it wasn't.

9 Q. And is this the Wednesday prior to her
10 death or two?

11 A. This is two Wednesdays prior.

12 Q. So approximately two weeks before the
13 death?

14 A. Yes.

15 Q. Did you see Michael that evening?

16 A. I did.

17 Q. Okay.

18 A. He came home -- really, I had not been
19 there very long when he came home. And she was --
20 he saw how upset and crying she was and.

21 Q. Did you tell him you wanted to get her
22 some help?

23 A. I did.

24 Q. And what was his response?

25 A. He said, if you'll pick the girls up

1 from school, Barbara, and take them home, let them
2 spend the night, I can calm her down. She's upset
3 because Camila, his first wife had called. And I
4 don't know what that was about, but the reason she
5 was upset was because of this interaction. And he
6 said I can calm her down. And I went -- I did what
7 he asked me to; I picked up the girls from school,
8 I took them home, they spent the night with me. I
9 called him and she was calmed down. I spoke with
10 her the next day and she was fine.

11 Q. Okay.

12 A. And I talked to her about --

13 Q. Just that's a good stopping point. You
14 didn't take her to go to the hospital?

15 A. No. Michael said that -- no. I told
16 him I would pay for it.

17 Q. Okay.

18 A. Because I knew they didn't have any
19 insurance. I said I will pay for it.

20 Q. Okay. Now, maybe within the week of
21 her death, did you go shopping?

22 A. We did.

23 Q. Who went with you?

24 A. Milan and Bishop and Sara Lynn, myself.
25 We went shopping to get Bishop's graduation dress

226 57	SMS Messages	Incoming		5/12/2015 5:32:08 PM(UTC+0)	From: +19198051617 Connie Wilson	I am not!!!! Lol	Intact
226 58	SMS Messages	Outgoing		5/12/2015 5:35:35 PM(UTC+0)	To: +19198051617 Connie Wilson		Intact
226 59	SMS Messages	Outgoing		5/12/2015 5:44:17 PM(UTC+0)	To: +18437434914 Luiza	por favor no me dejes . si no quieres trabajar para mr . michael , por favor me ayude a encontrar a alguien más	Intact
226 60	Web History			5/12/2015 5:51:17 PM(UTC+0)		berlin's charleston - Google Search	Intact
226 61	Web History			5/12/2015 5:51:27 PM(UTC+0)			Intact
226 62	SMS Messages	Outgoing		5/12/2015 5:52:46 PM(UTC+0)	To: +18437093501 Baby	Cool cool that's Kool	Intact
226 63	Web History			5/12/2015 5:54:48 PM(UTC+0)			Intact
226 64	Web History			5/12/2015 5:55:53 PM(UTC+0)		Apple Towing Co	Intact
226 65	Web History			5/12/2015 5:56:08 PM(UTC+0)		Furnishings	Intact
226 66	Web History			5/12/2015 5:56:28 PM(UTC+0)		berlin's charleston - Google Search	Intact
226 67	Web History			5/12/2015 5:56:37 PM(UTC+0)		Berlin's Used Restaurant Equipment North Charleston SC, 29406 - Manta.com	Intact
226 68	Instant Messages			5/12/2015 6:02:07 PM(UTC+0)	From: +18439263088 George Dias	On the line give us a sec please we will call	Intact
226 69	SMS Messages	Outgoing		5/12/2015 6:02:28 PM(UTC+0)	To: +18437093501 Baby	I'm going to the hospital. My moms taking me	Intact
226 70	Instant Messages			5/12/2015 6:03:26 PM(UTC+0)	From: +18434065735 My Love.. Sara Lynn Antonio Colucci	No problem. My mom is here and taking me & Bishop	Intact
226 71	Instant Messages		1	5/12/2015 6:07:40 PM(UTC+0)	From: +18434065735 My Love.. Sara Lynn Antonio Colucci	Please send to MC	Intact
226 72	Instant Messages			5/12/2015 6:08:00 PM(UTC+0)	From: +18439263088 George Dias	Golcha	Intact
226 73	Instant Messages			5/12/2015 6:08:40 PM(UTC+0)	From: +18434065735 My Love.. Sara Lynn Antonio Colucci	We need a pinafore like that one	Intact
226 74	SMS Messages	Outgoing		5/12/2015 6:09:32 PM(UTC+0)	To: +18437093501 Baby	We need a pinafore like that one	Intact
226 75	SMS Messages	Outgoing		5/12/2015 6:10:12 PM(UTC+0)	To: +18437093501 Baby	I sent it to George	Intact
226 76	SMS Messages	Outgoing		5/12/2015 6:12:05 PM(UTC+0)	To: +18437093501 Baby	I am checking in	Intact
226 77	SMS Messages	Outgoing		5/12/2015 6:12:08 PM(UTC+0)	To: +18437093501 Baby	Love you	Intact
226 78	SMS Messages	Outgoing		5/12/2015 6:12:57 PM(UTC+0)	To: +18437093501 Baby	I'm going to sew it	Intact
226 79	SMS Messages	Outgoing		5/12/2015 6:14:33 PM(UTC+0)	To: +18437093501 Baby	At Palmetto?	Intact
226 80	SMS Messages	Outgoing		5/12/2015 6:18:06 PM(UTC+0)	To: +18437093501 Baby	I am telling you au Love You. I'm shooting myself in the woods	Intact
226 81	SMS Messages	Outgoing		5/12/2015 6:18:28 PM(UTC+0)	To: +18437093501 Baby	Goodbye	Intact
226 82	Instant Messages		1	5/12/2015 6:32:03 PM(UTC+0)	From: +18439263088 George Dias	This is what we found	Intact
226 83	SMS Messages	Incoming		5/12/2015 6:49:32 PM(UTC+0)	From: +19198051617 Connie Wilson	Chuck hasn't heard back from Michael about moving boxes this afternoon. Can you see if he got the message?	Intact
226 84	SMS Messages	Incoming		5/12/2015 8:25:53 PM(UTC+0)	From: +18436057254 Dawn Ingle 7-14	Can you or michael. please call the bank and give them the ok, for me to pick up June, July august 2014, and Jan 2015 statements, Mr. Fox called again he	Intact
226 85	SMS Messages	Incoming		5/12/2015 8:25:53 PM(UTC+0)	From: +18436057254 Dawn Ingle 7-14	agrees thats the best way to handle.	Intact
226 86	Call Log	Outgoing		5/12/2015 8:39:29 PM(UTC+0)	To: 8437093501 Baby		Intact
226 87	SMS Messages	Incoming		5/12/2015 8:41:00 PM(UTC+0)	From: +19198051617 Connie Wilson	Can we move boxes tonight? Don't want to pack the truck until we hear from you about key.	Intact
226 88	SMS Messages	Outgoing		5/12/2015 8:43:18 PM(UTC+0)	To: +18437093501 Baby		Intact
226 89	Call Log	Outgoing		5/12/2015 8:43:40 PM(UTC+0)	To: 8437093501 Baby		Intact
226 90	SMS Messages	Incoming		5/12/2015 8:46:33 PM(UTC+0)	From: +18437093501 Baby	I Luv u. Always. Please allow me 10 min to decompress .	Intact
226 91	SMS Messages	Outgoing		5/12/2015 8:50:27 PM(UTC+0)	To: +18437093501 Baby	I don't correct tu nor Christ	Intact
226 92	SMS Messages	Outgoing		5/12/2015 8:59:28 PM(UTC+0)	To: +18437093501 Baby	Inn going to calo burgess	Intact
226 93	SMS Messages	Outgoing		5/12/2015 9:08:25 PM(UTC+0)	To: +19546242757 Louann	LouAnn call me please	Intact
226 94	Instant Messages			5/12/2015 9:10:39 PM(UTC+0)	From: +18434065735 My Love.. Sara Lynn Antonio Colucci	Call my please	Intact
226 95	Instant Messages			5/12/2015 9:11:34 PM(UTC+0)	From: +18434065735 My Love.. Sara Lynn Antonio Colucci	Mama please	Intact
226 96	SMS Messages	Incoming		5/13/2015 12:24:43 AM(UTC+0)	From: +19198051617 Connie Wilson	Praying for you!	Intact
226 97	Web History			5/13/2015 10:33:37 AM(UTC+0)			Intact
226 98	MMS Messages	Incoming	1	5/13/2015 1:33:34 PM(UTC+0)	From: +19198051617 Connie Wilson		Intact

230 64	Call Log	Incoming		5/18/2015 4:21:17 PM(UTC+0)	From: 8437890090 Barabra Moore		Intact
230 65	SMS Messages	Outgoing		5/18/2015 4:49:30 PM(UTC+0)	To: +18436478443 Next Door Debbie	I can get you a cool bangle bracelet with black stones- let me see what I've got. I can get/ make anything.	Intact
230 66	SMS Messages	Outgoing		5/18/2015 4:49:44 PM(UTC+0)	To: +18436478443 Next Door Debbie	I'll charge u 10% over my cost	Intact
230 67	Call Log	Incoming		5/18/2015 4:50:48 PM(UTC+0)	From: 8435548451 Mr Mike		Intact
230 68	SMS Messages	Outgoing		5/18/2015 4:54:12 PM(UTC+0)	To: +19198051617 Connie Wilson	Hmm, there should be- I had a refrigerator in my kitchen area that was set up I'll ask him. Are u tutoring today? My mom wanted to know- if not can you meet her at the gas station? If so, she'll be there at 3pm	Intact
230 69	SMS Messages	Outgoing		5/18/2015 4:55:44 PM(UTC+0)	To: +19198051617 Connie Wilson	If u ARE tutoring she'll be there at 3	Intact
230 70	Web History			5/18/2015 4:56:02 PM(UTC+0)		Skydiving Charleston - Tandem Skydiving in Charleston, South Carolina!	Intact
230 71	SMS Messages	Incoming		5/18/2015 5:03:08 PM(UTC+0)	From: +19198051617 Connie Wilson	I have a faculty meeting! Double yuck!	Intact
230 72	SMS Messages	Outgoing		5/18/2015 5:03:30 PM(UTC+0)	To: +19198051617 Connie Wilson	No prob. Do u have keys to warehouse?	Intact
230 73	SMS Messages	Incoming		5/18/2015 5:04:16 PM(UTC+0)	From: +19198051617 Connie Wilson	Chuck does. Bringing a load this afternoon!	Intact
230 74	SMS Messages	Outgoing		5/18/2015 5:04:38 PM(UTC+0)	To: +19198051617 Connie Wilson	The gate key too?	Intact
230 75	SMS Messages	Incoming		5/18/2015 5:05:58 PM(UTC+0)	From: +19198051617 Connie Wilson	Yes.	Intact
230 76	SMS Messages	Outgoing		5/18/2015 5:06:07 PM(UTC+0)	To: +18436057868 Phatfil 5-14	Today is the day Michael passed 8 years ago. Sucks	Intact
230 77	SMS Messages	Outgoing		5/18/2015 5:08:56 PM(UTC+0)	To: +18436057868 Phatfil 5-14	I didn't bring it up to anyone else	Intact
230 78	SMS Messages	Incoming		5/18/2015 5:11:42 PM(UTC+0)	From: +18436057868 Phatfil 5-14	I know!!come down to shop when u get freed up.hun	Intact
230 79	SMS Messages	Outgoing		5/18/2015 5:15:35 PM(UTC+0)	To: +18436057868 Phatfil 5-14	I'm okay. Can't do anything abt. It I guess	Intact
230 80	SMS Messages	Outgoing		5/18/2015 5:20:24 PM(UTC+0)	To: +18436057868 Phatfil 5-14	I just tend to relive that day- thinking of how EVERYONE was at the house by now. How Brian called me at 7:30am, then hung up & the coroner called back to tell me my husband was dead in the road. Etc. I just want to go back to bed, but life goes on	Intact
230 81	SMS Messages	Outgoing		5/18/2015 5:20:48 PM(UTC+0)	To: +19198051617 Connie Wilson	No problem	Intact
230 82	SMS Messages	Incoming		5/18/2015 5:22:46 PM(UTC+0)	From: +19198051617 Connie Wilson	Will miss my girls today! Going to ride bikes later possibly! If they get home in time, text or call me. Also, can you and the girls go for a pedicure on Wednesday or Thursday after school?	Intact
230 83	SMS Messages	Incoming		5/18/2015 5:26:38 PM(UTC+0)	From: +18436057868 Phatfil 5-14	Xxxx.it truly is a tragedy.I'm here if u need me	Intact
230 84	SMS Messages	Outgoing		5/18/2015 5:53:38 PM(UTC+0)	To: +18436057868 Phatfil 5-14	Thnx	Intact
230 85	SMS Messages	Outgoing		5/18/2015 6:54:34 PM(UTC+0)	To: +18436057868 Phatfil 5-14	It NEVER GETS EASIER	Intact
230 86	SMS Messages	Outgoing		5/18/2015 5:56:56 PM(UTC+0)	To: +18436057868 Phatfil 5-14	I don't want to say anything to Michael because I know he loves me & somewhat understands- Though I thank you for just listening to me, because it makes me crazy on the inside.	Intact
230 87	SMS Messages	Outgoing		5/18/2015 6:01:06 PM(UTC+0)	To: +18436057868 Phatfil 5-14	I had to bury my baby. Two days from now 05/20, which was our anniversary. I thought 14 years together was an achievement. I never cheated on him, always loved him & miss him A LOT When u know & Live with someone over half of your life- it's fucking devastating. I'm done. I'm sorry. You lost your mom so, I know you know. And my situation palas in comparison to yours.	Intact
230 88	SMS Messages	Incoming		5/18/2015 6:02:50 PM(UTC+0)	From: +18436057868 Phatfil 5-14	Yea.I mean I hate to sy it.but its been 35 years and my dads tragic death can still shut me down.just know u got love and keep on going for bishop.thats	Intact
230 89	SMS Messages	Incoming		5/18/2015 8:02:50 PM(UTC+0)	From: +18436057868 Phatfil 5-14	what "ill buddy" would have wanted.I'm gonna get back to work.will xhk back n a bit.xxxx	Intact
230 90	Call Log	Incoming		5/18/2015 8:05:23 PM(UTC+0)	From: 8665705277		Intact
230 91	SMS Messages	Outgoing		5/18/2015 6:06:39 PM(UTC+0)	To: +18436057868 Phatfil 5-14	Okay. Your words of encouragement have me getting my anger under control and try to get in the shower. Nevermind. I'm crying again.	Intact
230 92	Call Log	Incoming		5/18/2015 8:08:51 PM(UTC+0)	From: 8437890090 Barabra Moore		Intact
230 93	SMS Messages	Outgoing		5/18/2015 8:10:21 PM(UTC+0)	To: +18436057868 Phatfil 5-14	I'm getting in the shower. I'm going to try & not drink too. If I can accept it, Then maybe I'll be ok	Intact
230 94	SMS Messages	Outgoing		5/18/2015 8:11:39 PM(UTC+0)	To: +18436057868 Phatfil 5-14	I feel like too that no one wants to hear about it- but I can't let him go. He will be rembered	Intact

230 95	SMS Messages	Outgoing		5/18/2015 6:13:36 PM(UTC+0)	To: +18436057868 Phatfil 5-14	My mom argued with yesterday that he died yesterday- Look at a calendar People want to help, but I feel like their saying "shut up about it" I can't though	Intact
230 96	SMS Messages	Outgoing		5/18/2015 6:18:02 PM(UTC+0)	To: +18436057868 Phatfil 5-14	Thanks for being his only friend who still cares about not only him, but Bishop & I.	Intact
230 97	SMS Messages	Incoming		5/18/2015 6:22:30 PM(UTC+0)	From: +18436057868 Phatfil 5-14	YeS pisses me off when you see that face book thing blow up.but naya a mother fucker calls about bish or even asks.but don't get mad.remember the great ii	Intact
230 98	SMS Messages	Incoming		5/18/2015 6:22:31 PM(UTC+0)	From: +18436057868 Phatfil 5-14	fe he had. He truly was an amazing guy.I love and miss that boy tooooo.just look into bishops eyes and there he is.I love ya.PEACE!!!!	Intact
230 99	SMS Messages	Outgoing		5/18/2015 6:23:47 PM(UTC+0)	To: +18436057868 Phatfil 5-14	I can't even get on FB Hope everyone is being cool	Intact
231 00	SMS Messages	Incoming		5/18/2015 6:28:02 PM(UTC+0)	From: 32665	Your Facebook security code: 893787	Intact
231 01	Notes			5/18/2015 6:58:36 PM(UTC+0)		FB <div>Bishop12345678</div>	Intact
231 02	Call Log	Incoming		5/18/2015 7:05:10 PM(UTC+0)	From: 8037710923		Intact
231 03	Call Log	Incoming		5/18/2015 7:05:45 PM(UTC+0)	From: 8037710923		Intact
231 04	Call Log	Outgoing		5/18/2015 7:06:14 PM(UTC+0)	To: 8037710923		Intact
231 05	SMS Messages	Incoming		5/18/2015 7:10:09 PM(UTC+0)	From: +19198051617 Connie Wilson	May have just talked your mom into going with us on the field trip tomorrow!	Intact
231 06	SMS Messages	Outgoing		5/18/2015 7:13:23 PM(UTC+0)	To: +19198051617 Connie Wilson	She will!!	Intact
231 07	SMS Messages	Incoming		5/18/2015 7:16:37 PM(UTC+0)	From: +19198051617 Connie Wilson	I hope so!	Intact
231 08	Call Log	Incoming		5/18/2015 7:21:36 PM(UTC+0)	From: 8437890090 Barabra Moore		Intact
231 09	Call Log	Incoming		5/18/2015 7:22:12 PM(UTC+0)	From: 8437237481 Barry Krell		Intact
231 10	Web History			5/18/2015 7:33:47 PM(UTC+0)		Friends of Michael Nicholas Vieira (7/28/74-5/18/07)	Intact
231 11	SMS Messages	Incoming		5/18/2015 7:57:51 PM(UTC+0)	From: +18434524320 Joanna Jasmynes Mom	I figured out what was wrong with Jasmine. I did not give her her medicine for 2 days durian I am sure that's what it was because I am irritable when I don't take my medicine. we are on the same medication	Intact
231 12	SMS Messages	Outgoing		5/18/2015 7:58:39 PM(UTC+0)	To: +18434524320 Joanna Jasmynes Mom	Does Whole Foods have it?	Intact
231 13	SMS Messages	Incoming		5/18/2015 7:59:06 PM(UTC+0)	From: +18434524320 Joanna Jasmynes Mom	No it is a prescription	Intact
231 14	SMS Messages	Outgoing		5/18/2015 7:59:18 PM(UTC+0)	To: +18434524320 Joanna Jasmynes Mom	Exactly	Intact
231 15	SMS Messages	Incoming		5/18/2015 7:59:49 PM(UTC+0)	From: +18434524320 Joanna Jasmynes Mom	It isn a d h d medication it is a controlled subject	Intact
231 16	SMS Messages	Outgoing		5/18/2015 8:00:07 PM(UTC+0)	To: +18434524320 Joanna Jasmynes Mom	Exactly	Intact
231 17	Call Log	Outgoing		5/18/2015 8:00:50 PM(UTC+0)	To: +14026587379 Aunt carol call		Intact
231 18	Call Log	Outgoing		5/18/2015 8:01:29 PM(UTC+0)	To: +14026587379 Aunt carol call		Intact
231 19	Call Log	Outgoing		5/18/2015 8:02:31 PM(UTC+0)	To: smeyers4@at.net Mikel Meyers		Intact
231 20	SMS Messages	Incoming		5/18/2015 8:03:12 PM(UTC+0)	From: +18434524320 Joanna Jasmynes Mom	We are sorry about that. I told Jasmine she needs to call you and apologize but she doesn't want to shoes scared that you are mad at her	Intact
231 21	SMS Messages	Outgoing		5/18/2015 8:03:13 PM(UTC+0)	To: smeyers4@at.net Mikel Meyers	He'll! Please call me, it's Sara Lynn	Intact
231 22	SMS Messages	Outgoing		5/18/2015 8:04:05 PM(UTC+0)	To: +18434524320 Joanna Jasmynes Mom	This is the day that Bishops dad died 8 years ago, so we are on the way to the cemetery	Intact
231 23	SMS Messages	Outgoing		5/18/2015 8:05:33 PM(UTC+0)	To: +18434524320 Joanna Jasmynes Mom	Have a great evening. Let Jas know that as well!	Intact
231 24	Call Log	Outgoing		5/18/2015 8:05:40 PM(UTC+0)	To: smeyers4@at.net Mikel Meyers		Intact
231 25	SMS Messages	Incoming		5/18/2015 8:05:51 PM(UTC+0)	From: +18434524320 Joanna Jasmynes Mom	Oh god I am so sorry I had no idea I am sorry I bothered you with this information please forgive me I know you have more important things on your mind I am so so sorry	Intact
231 26	SMS Messages	Outgoing		5/18/2015 8:06:31 PM(UTC+0)	To: +18434524320 Joanna Jasmynes Mom	Thank you a lot Jo	Intact
231 27	Call Log	Outgoing		5/18/2015 8:06:51 PM(UTC+0)	To: +14026587379 Aunt carol call		Intact
231 28	SMS Messages	Incoming		5/18/2015 8:07:28 PM(UTC+0)	From: +18434524320 Joanna Jasmynes Mom	God bless y'all. My prays r with u	Intact
231 29	Call Log	Outgoing		5/18/2015 8:07:30 PM(UTC+0)	To: 8437890090 Barabra Moore		Intact
231 30	Call Log	Outgoing		5/18/2015 8:08:05 PM(UTC+0)	To: 8437890090 Barabra Moore		Intact
231 31	SMS Messages	Outgoing		5/18/2015 8:11:43 PM(UTC+0)	To: +18434524320 Joanna Jasmynes Mom	It's bad every year	Intact
231 32	Call Log	Outgoing		5/18/2015 8:11:56 PM(UTC+0)	To: 8437890090 Barabra Moore		Intact
231 33	SMS Messages	Incoming		5/18/2015 8:12:20 PM(UTC+0)	From: +18434524320 Joanna Jasmynes Mom	Of course	Intact
231 34	Call Log	Outgoing		5/18/2015 8:13:07 PM(UTC+0)	To: 8437890090 Barabra Moore		Intact



31-15-0074

2265 Executive Drive, Indianapolis, IN 46241
 Telephone: (800)875-3894 / Fax: (317)243-2789
 Toxicology: (317)381-5678

Laboratory Case Number: 2949802 Client Account: 17581 / berc01 Physician: Report To: Berkeley County Coroner's Off ATTN: William Salisbury 300-B California Ave. Moncks Corner, SC 29461 FX: 843-719-4570	Subject's Name: CULUCCI, SARAH Agency Case #: FA15-326 Date of Death: 05/20/2015 Test Reason: Other Investigator: D. Hartwell Date Received: 05/27/2015 Date Reported: 06/17/2015
--	--

Laboratory Specimen No: 40495894 Container(s): 01:GRT Blood, PERIPHERAL	Date Collected: 05/21/2015 12:30 Test(s): 70510 Comprehensive Drug Panel
--	---

Analyte Name	Result	Concentration	Units	Therapeutic Range	Loc
AMPHETAMINES	Negative				
BARBITURATES	Negative				
BENZODIAZEPINES	POSITIVE				
Alprazolam	POSITIVE				
Alprazolam, Quant		26.0	ng/mL	10 - 40	
CANNABINOIDS	Negative				
COCAINE/METABOLITES	POSITIVE				
Benzoylcegonine	POSITIVE				
Benzoylcegonine, Quant		73.4	ng/mL		
FENTANYL	Negative				
METHADONE/METABOLITE	Negative				
OPIATES	Negative				
OXYCODONE/METABOLITE	Negative				
PHENCYCLIDINE	Negative				
PROPOXYPHENE/METABOLITE	Negative				
ALCOHOL					
Methanol	Negative				
Ethanol	POSITIVE				
Ethanol, Quant		0.229	% (w/v)	Not Established	
Acetone	Negative				
Isopropanol	Negative				
ANALGESICS	Negative				
ANESTHETICS	Negative				

CULUCCI, SARAH
 Laboratory Case #: 2949802
 Printed Date/Time: 06/17/2015, 10:01



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Laboratory Specimen No: 40495694

Continued..

Analyte Name	Result	Concentration	Units	Therapeutic Range	Loc
ANTIBIOTICS	Negative				
ANTICONVULSANTS	Negative				
ANTIDEPRESSANTS	Negative				
ANTIHISTAMINES	Negative				
ANTIPSYCHOTICS	Negative				
CARDIOVASCULAR AGENTS	Negative				
ENDOCRINE AGENTS	Negative				
GASTROENTEROLOGY AGENTS	Negative				
NARCOTICS	Negative				
NEUROLOGY AGENTS	Negative				
SEDATIVES/HYPNOTICS	Negative				
STIMULANTS	POSITIVE				
Caffeine	POSITIVE				
Analyte is qualitatively POSITIVE, but has not been confirmed by an alternate analytical method.					
UROLOGY AGENTS	Negative				

Specimens will be kept for at least one year from the date of initial report.

CULUCCI, SARAH
Laboratory Case #: 2949802
Printed Date/Time: 06/17/2015, 10:01

Page: 2 of 5

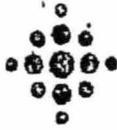


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Laboratory Specimen No: 40495695	Date Collected: 06/21/2015 12:30
Container(s): 01:UR Urine, Random	Test(s): 70080 Drugs of Abuse Panel

Analyte Name	Result	Concentration	Units	Therapeutic Range	Loc
ALCOHOL	POSITIVE				
Ethanol	POSITIVE				
Ethanol, Quant		0.244	% (w/v)		
AMPHETAMINES	Negative				
BARBITURATES	Negative				
BENZODIAZEPINES	Negative				
BUPRENORPHINE/METABOLITE	Negative				
CANNABINOIDS	Negative				
CARISOPRODOL/METABOLITE	Negative				
COCAINE/METABOLITES	POSITIVE				
Benzoylcegonine	POSITIVE				
Benzoylcegonine, Quant		616	ng/mL		
FENTANYL	Negative				
METHADONE/METABOLITE	Negative				
OPIATES	Negative				
OXYCODONE/METABOLITE	Negative				
PHENCYCLIDINE	Negative				
PROPOXYPHENE/METABOLITE	Negative				
TRAMADOL/METABOLITE	Negative				



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Toxicology: (317)361-5678

Laboratory Specimen No: 40495697	Date Collected: 05/21/2015 12:30
Container(s): 01:VIT_CON Vitreous,EYE	Test(s):

Analyte Name	Result	Concentration	Units	Therapeutic Range	Loc
ALCOHOL					
Methanol	Negative				
Ethanol	POSITIVE				
Ethanol, Quant		0.238	% (w/v)	Not Established	
Acetone	Negative				
Isopropanol	Negative				



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Toxicology: (317)381-5678

Laboratory Specimen No:	40495698	Date Collected:	05/21/2015 12:30
Container(s):	01:GRT Blood,PERIPHERAL	Test(s):	49900 Not Tested

Analyte Name	Result	Concentration	Units	Therapeutic Range	Loc
< No Testing Performed >					

The Specimen identified by the Laboratory Specimen Number has been handled and analyzed in accordance with all applicable requirements.

Laboratory Director

CULUCCI, SARAH

Case Reviewer

Andrea Terrell, Ph.D., DABCC

Laboratory Case #:2949802

Print Date/Time:06/17/2015, 10:01

Page: 5 of 5

This individual may not have performed any of the analytical work.



The Mary Jenkins Center

31-15-0074 11/16

James Jenkins, MD
Iris Elliott, LPC

Sherlonda Adkins, PA-C
Ellenor Mahon, LPC

July 15, 2016

3300A W. Montague Avenue, Suite 203
North Charleston, SC 29418

(843) 740-6999
(843) 740-5433 (FAX)

July 18, 2016

RE: Sara Vieira

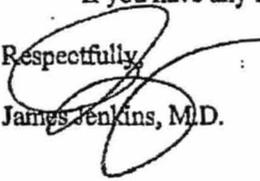
DOB: [REDACTED]

To Whom It May Concern:

Sara was followed in this office from October 5, 2009 to April 16, 2015 for medication management of her diagnosis of ADHD (all dates of treatment), Anxiety State: NOS (3/7/2011-4/16/15), and Major Depressive Disorder: Recurrent (8/8/13-4/16/15).

If you have any further questions, please contact me at the above number.

Respectfully,


James Jenkins, M.D.

DEATH CERTIFICATION AMENDED
STATE FILE NUMBER: 139-07-014601

DECEDENT'S INFORMATION:

NAME: *MICHAEL NICHOLAS VIEIRA*

AKA's: NOT LISTED

SEX: MALE

SOCIAL SECURITY NUMBER: [REDACTED]

ARMED FORCES: NO

DATE OF DEATH: MAY 18 2007

DATE OF BIRTH: [REDACTED]

AGE: 32 YEARS

PLACE OF DEATH INFORMATION:

TYPE: OTHER (SPECIFY)

FACILITY NAME AND ADDRESS: 209 TIBTON CIRCLE, MYRTLE BEACH, HORRY COUNTY, SC 29577

DISPOSITION INFORMATION:

METHOD: BURIAL

PLACE: MAGNOLIA CEMETERY

LOCATION: CHARLESTON, SOUTH CAROLINA

DEMOGRAPHIC INFORMATION:

RESIDENCE: 4832 HEARTHSIDE DRIVE, SUMMERVILLE, DORCHESTER COUNTY, SC, 29485

PLACE OF BIRTH: MASSACHUSETTS

MARITAL STATUS: MARRIED

SURVIVING SPOUSE'S NAME: SARA LYNN MOORE

FATHER'S NAME: JOHN W VIEIRA

MOTHER'S NAME PRIOR TO FIRST MARRIAGE: LOUANN SINGELAKIS

INFORMANT'S INFORMATION:

INFORMANT'S NAME: SARA LYNN VIEIRA

RELATIONSHIP: FAMILY MEMBER

MAILING ADDRESS: 4832 HEARTHSIDE DRIVE, SUMMERVILLE, SC, 29485

FUNERAL HOME: PARKS FUNERAL HOME, INC., 130 W. 1ST NORTH ST., SUMMERVILLE, SC, 29483

FUNERAL DIRECTOR: JOHN B. PARKS III

LICENSE NUMBER: 1615

EMBALMER'S NAME: CRAIG THOMAS

LICENSE NUMBER: 2810

CAUSE OF DEATH - PART I

MULTIPLE STAB WOUNDS TO CHEST AND ABDOMEN WITH MASSIVE HEMORRHAGE

PART II

CORONER CONTACTED? YES

AUTOPSY PERFORMED? YES

AUTOPSY AVAILABLE? YES

ACTUAL OR PRESUMED TIME OF DEATH: 01:00 AM MANNER OF DEATH: ACCIDENT

INJURY INFORMATION:

DATE OF INJURY: MAY 18 2007

TIME OF INJURY: 01:00 AM

INJURY AT WORK? NO

PLACE OF INJURY: SOMEONE'S YARD

LOCATION OF INJURY: 209 TIBTON CIRCLE, MYRTLE BEACH, HORRY COUNTY, SC, 29575

HOW THE INJURY OCCURRED?

STABBED SELF

CERTIFIER NAME AND TITLE: DEP. CORONER TAMARA A. WILLARD

LICENSE NUMBER: NOT LISTED

CERTIFIER'S ADDRESS: 2560 N MAIN ST #3, CONWAY, SC, 29526

DATE FILED: MAY 22 2007

DATE OF ISSUANCE: SEP 28 2007

SPECIAL INSTRUCTIONS:

9/21/7 DEP COR T WILLARD, 9/21/7 DEP COR T WILLARD, AUTOPSY AVAIL AMENDED: 9/21/7 DEP COR T WILLARD, COD A AMENDED BY: 9/21/7 DEP COR T WILLARD, DATE OF INJURY AMENDED BY: , MOD AMENDED BY: 9/21/7 DEP COR T WILLARD, PLACE OF INJURY AMENDED: 9/21/7 DEP COR T WILLARD, 9/21/7 DEP COR T WILLARD, 9/21/7 DEP COR T WILLARD, INJ AT WORK AMENDED BY: 9/21/7 DEP COR T WILLARD, INJ DESCRIPTION AMENDED: 9/21/7 DEP COR T WILLARD, 9/21/7 DEP COR T WILLARD, 9/21/7 DEP COR T WILLARD, PLACE OF INJURY AMENDED BY: 9/21/7 TYPO ERROR, LOCATION OF INJURY STREET NAME AMENDED BY: , LOCATION OF INJURY STREET NUMBER AMENDED BY: , LOCATION OF INJURY STREET TYPE AMENDED BY: , INJURY DESCRIPTION AMENDED BY: TYPO ERROR