

FILED <sup>MPP</sup>

STATE OF SOUTH CAROLINA 2025 MAY 22 PM 12:00 IN THE COURT OF GENERAL SESSIONS

COUNTY OF BERKELEY LEAH GUFFY DUPREE CLERK OF COURT FOR THE NINTH JUDICIAL CIRCUIT BERKELEY COUNTY, SC

INDICTMENT NUMBER: 2016-GS-08-2603

The State,

v.

Michael Colucci.

DEFENDANT

**MOTION TO ADMIT STATEMENTS  
PURSUANT TO JACKSON V. DENNO  
AND SCRE 801(D)(2)**

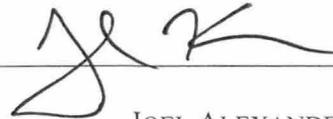
The State moves for the admission of statements made by Defendant to various individuals pursuant to South Carolina Rule of Evidence 801(d)(2) and *Jackson v. Denno*, 378 U.S. 368, 84 S.Ct. 1774 (1964). Pursuant to *Jackson v. Denno*, a determination must be made regarding the voluntariness of a statement given to law enforcement when the Defendant was not in custody. The State moves for a hearing to determine the voluntariness of statements made from the Defendant to the following individuals:

1. Bobby Shuler, Berkeley County Sheriff's Office
2. William Kimbro, Berkeley County Sheriff's Office

RESPECTFULLY SUBMITTED:

ALAN WILSON  
ATTORNEY GENERAL

BY:



JOEL ALEXANDER KOZAK  
KINLI BARE ABEE  
STATE OF SOUTH CAROLINA

JUNE 16, 2024  
COLUMBIA, SC