

**IN THE SUPREME COURT OF THE STATE OF MISSISSIPPI**

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**2009-CP-00073**

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**CHARLIE TAYLOR  
APPELLANT**

**v.  
DAVID PETRIE  
APPELLEE**

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**On Appeal From the Circuit Court  
of Sunflower County, Mississippi**

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**BRIEF OF APPELLEE**

**JIM HOOD, ATTORNEY GENERAL  
STATE OF MISSISSIPPI**

**JAMES M. "JIM" NORRIS  
SPECIAL ASSISTANT ATTORNEY GENERAL**

**JANE L. MAPP  
SPECIAL ASSISTANT ATTORNEY GENERAL  
MSB# [REDACTED]**

**510 George Street, Suite 212  
Jackson, MS 39202  
(601) 359-5770**

### CERTIFICATE OF INTERESTED PARTIES

The undersigned counsel of record certifies that the following listed persons have an interest in the outcome of this case. These representations are made in order that the justices of this Court may evaluate possible disqualifications or recusal:

1. Inmate Charlie Taylor, Appellant
2. David Petrie, Appellee
3. Hon. W. Ashley Hines, Circuit Court Judge
4. Jim Hood, Attorney General for the State of Mississippi

The undersigned counsel further certifies that the following attorneys have an interest in the outcome of this case:

For Appellee:

1. Jane Mapp, Special Assistant Attorney General, State of Mississippi
2. Jim Norris, Attorney Senior, Mississippi Department of Corrections

By: Jane Mapp

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## **ISSUES**

**I. Whether Taylor Was Prevented from Exhausting His Administrative Remedies Contrary to MDOC Policy 20-08-01.**

**II. Whether Taylor Has Stated a Claim upon Which Relief May Be Granted.**

**III. Whether Taylor Was Denied His Right to Appeal the 9-3-08 Stay Order.**

**IV. Whether Taylor Was Subjected to Retaliation for Exercising His First Amendment Right to Redress the Courts and for Filing Grievances Against CMCF and MSP Prison Staff and Medical Staff.**

**V. Whether Taylor Was Denied Access to the Court Contrary to MDOC Policies 20-02-01- and 31-01-01.**

**VI. Whether Taylor Was Denied His Right to Appeal and Seek Judicial Review of RVR Appeal # 627330 Contrary to Miss. Code Ann. § 47-5-801 through 47-5-807 and Policy 18-01-01.**

**VII. Whether Taylor should have been granted Summary Judgment.**

**VIII. Whether Judge Ashley Hines should of [sic] recused himself for being bias[ed] and preduice[d].**

## STATEMENT OF THE CASE

On or about July 15, 2008 Charlie Taylor (Taylor), a state inmate legally incarcerated within the Mississippi Department of Corrections (MDOC), filed a complaint in the Circuit Court of Sunflower County, Mississippi entitled “Motion to Show Cause” against MDOC officials and staff, David Petrie, Christopher Epps, Gloria Clark and Christie Scott. (R1:004)<sup>1</sup>. In his complaint, Taylor presented five separate claims to the court for review: (1) whether he had exhausted his administrative remedies; (2) whether funds were being embezzled from his inmate account; (3) whether his housing assignment was the result of retaliation and in violation of Miss. Code Ann. § 47-5-103(1); (4) whether he was being treated with deliberate indifference to his serious medical needs; and (5) whether he has been denied access to the court and his right to worship.

In his complaint Taylor claimed that he was not allowed to attend a Kairos (religious) service on June 10, 2006. (R1:008). Taylor states that he was informed by Charles Hand that he would have to be searched before he could attend the service. Taylor stated he had a verbal confrontation with Hand and refused to be searched. Hand then called for backup and searched Taylor. Taylor alleges that this search amounted to a sexual assault and that afterwards he was then not allowed to attend the service.

Also, in his complaint Taylor alleges that MDOC has deducted money from his inmate account for court costs and filing fees even though the court entered an order terminating his

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<sup>1</sup>Citations to the Record will be in the form of (RX:YYY) with “X” representing the volume number and YYY representing the page number.

pauper status. (R1:006). Taylor also complains that he was moved to a different housing unit within the same facility allegedly in retaliation for exposing unlawful activity of staff members. (R1:009). Next, Taylor complains that prison staff has been indifferent to his serious medical needs in denying him an adequate 3,000 calorie diet with a snack bag. He alleges that he is being given smaller portions than contained in the regular meal diet and that food is being withheld by staff or sold by inmates. Taylor also maintains that he has been denied effective access to the courts by MDOC law libraries and staff.

Taylor states that he attempted to exhaust his administrative remedies with MDOC's Administrative Remedy Program (ARP) regarding the alleged sexually assault by Charles Hand, but his grievance was dismissed because his appeal to the Third Step was untimely. Taylor maintains that he timely submitted his Third Step on February 18, 2008 to Christie Scott in the CMCF Inmate Legal Assistance Office (ILAP). (R1:011). Taylor makes no explanation as to why he failed to exhaust his administrative remedies regarding all the other claims made his is complaint. Namely, denial of access to the June 10, 2009 Karios service, denial of a 3,000 diet with a snack bag<sup>2</sup>, improper removal of funds from his inmate account, retaliation in the form of a change in housing assignments, and denial of access to the courts.

An answer was filed on behalf of the Defendants on August 5, 2008 citing among other affirmative defenses, Taylor's failure to exhaust his administrative remedies as required by Miss. Code Ann. § 47-5-801 through 807. (R2:213).

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<sup>2</sup>There are documents in the record submitted by Taylor showing a federal lawsuit he filed regarding this issue was dismissed as without merit. (R3:366-373).

On or about August 21, 2008 Taylor filed a "Motion to Recuse." Taylor gave no factual basis to support recusal other than to allege "that it would simply be impossible for Judge Hines to be fair and impartial after conspiring with counsel for Defendants in a crime under color of state." (R2:220). Taylor's "Motion to Recuse" was subsequently denied by the Judge Hines on or about November 12, 2008. (R3:428).

On September 30, 2008, Circuit Court Judge Ashley Hines, entered an order staying the proceedings for 90 days to give Taylor an opportunity to present evidence that he had exhausted his administrative remedies as required by law. (R3:345). Subsequently, Taylor filed a "Motion Opposing Stay". (R3:346). Taylor argued in this motion that since he had told the court that he had exhausted his administrative remedies he was not required to present any further evidence to support that contention, but instead it was an affirmative defense that must be pled and proven by the defendants. (R3:347-48).

In an Order entered December 18, 2008 Judge Hines found that Taylor had failed to exhaust his administrative remedies as required pursuant to Miss. Code Ann. § 47-5-801 through § 47-5-807 and dismissed his petition for failure to state a claim. (R5:637-38). Feeling aggrieved Taylor filed his notice of appeal to the Mississippi Supreme Court and paid the filing fee and costs of appeal. (R5:668).

### **SUMMARY OF THE ARGUMENT**

The lower court lacked jurisdiction in this matter since Taylor failed to exhaust his administrative remedies as required by Miss. Code Ann. § 47-5-801, *et seq.*



## ARGUMENT

### **I. Whether Taylor Was Prevented from Exhausting His Administrative Remedies Contrary to MDOC Policy 20-08-01.**

The lower court dismissed Taylor's petition finding that he failed to exhaust his administrative remedies as required pursuant to Miss. Code Ann. § 47-5-801 through § 47-5-807. Pursuant to Miss. Code Ann. § 47-5-803(2):

No state court shall entertain an offender's grievance or complaint which falls under the purview of the administrative review procedure unless and until such offender shall have exhausted the remedies as provided in such procedure. If at the time the petition is filed the administrative review process has not yet been completed, the court shall stay the proceedings for a period not to exceed ninety (90) days to allow for completion of the procedure and exhaustion of the remedies thereunder.

The lower court properly stayed the proceedings for 90 days to allow Taylor the opportunity to complete the Administrative Remedy Program (ARP) and dismissed his petition when Taylor failed to present evidence that he had done so. *See, Guy v. State*, 915 So.2d 508, 510 (Miss. Ct. App. 2005).

Taylor argues that he was prevented from exhausting his administrative remedies by prison staff contrary to MDOC policy. He states that he attempted to file sensitive issue grievances regarding the denial of state issued clothing and the denial of Kairos worship services, but was denied. He also states that his ARP regarding being sexually harassed by Charles Hand was improperly dismissed for failing to timely appeal to the Third Step. Taylor argues that he timely submitted it to Christie Scott in the Inmate Legal Assistance Office (ILAP) for mailing and she failed to mail it properly.

While in his brief Taylor seems to focus on the ARP he filed regarding being sexually harassed by Charles Hand he actually made a number of claims. To be properly before the court for judicial review, he would be required to exhaust his administrative remedies on each separate issue. The numerous claims mentioned at some point in his lower court filings or in his appeal brief include whether funds were being embezzled from his inmate account; whether his housing assignment was the result of retaliation and in violation of Miss. Code Ann. § 47-5-103(1); whether he was being treated with deliberate indifference to his serious medical needs; whether he was sexually harassed by Charles Hands; whether he was denied a new set of state issued clothing; whether he has been denied access to the courts; and whether he was denied his right to worship.

Taylor does attach copies of documents indicating that he filed grievances with the ARP on some of these issues, but nothing in the record indicates that he ever exhausted his administrative remedies on any of them. In his brief Taylor states that he tried to filed "Sensitive Issue" grievances regarding his state issued clothing and his denial of Karios worship services, but was not allowed to do so. Per MDOC Standard Operation Procedure (SOP) 20-08-01, if an offender believes he will be adversely affected by filing a grievance of a sensitive nature at his housing facility, then he may file a complaint directly to the Third Step Level upon approval of the Legal Claim Adjudicator. The denial of sensitive issue status does not prevent an offender from exhausting his administrative remedies because he still has the opportunity to file a request for administrative remedy through normal ARP

procedures. (See policy at R3:351). Taylor included in the record at least one letter from defendant David Petrie denying his request that his grievance be treated as a sensitive issue and informing him that he could submit the grievance through regular channels. (R4:567). It appears that Taylor was trying to manipulate the ARP process by labeling his grievances as sensitive issues. This policy was mostly assuredly not put in place for complaints as mundane as an inmate's complaint that he had not received a new set of state issued pants when he thought he should. The denial of sensitive issue status did not prevent Taylor from exhausting his administrative remedies because he still had the opportunity to file his grievances through regular channels.

The record indicates that Taylor failed to exhaust his administrative remedies regarding most claims because he had a backlog of at least 10 grievances and went forward with the instant case without waiting for the ARP to get to them all. Per SOP 20-08-01 when an offender files multiple grievances the first request will be accepted for handling and the others will be handled at the Adjudicator's discretion. Only 10 grievances may be active at any one time and requests that exceed that number will be returned to the offender without being filed. The record clearly indicates that Taylor abused the ARP system and had at least one grievance returned because he already had the maximum 10 requests pending. (R1:028) Taylor was also informed when his grievance regarding being sexually harassed was accepted that he had other ARPs pending, but that if he wanted it handled immediately he could withdraw his previously submitted grievances. (R1:038).

The only issue that the record indicates that Taylor was close to exhausting his administrative remedies regarding is his claim that he was sexually harassed by Charles Hand. In the request for administrative remedy Taylor stated that Charles Hand sexually harassed and assaulted him when he searched Taylor prior to a Kairos worship service. Taylor requested relief in the form of a restraining order against Lt. Hand, psychological help for Lt. Hand, and Lt. Hand's suspension or termination. (R1:40-41). In the first step response Warden James Brewer stated that Taylor was now housed at Unit 32, apparently away from Lt. Hand, and therefore the matter was considered resolved. (R1:049). In second step response Superintendent Lawrence Kelly informed Taylor that Lt. Hand was no longer employed with MDOC. (R1:050). Since Lt. Hand was no longer employed with MDOC the department had no authority to grant Taylor the relief requested and his grievance was effectively moot. Regardless, Taylor was not satisfied and attempted to appeal to the Third Step. He attached a copy of the Third Step Relief Form which he dated February 15, 2008, the same day he received his Second Step Response. (R1: 48; 52). He also includes a copy of an ILAP Request Form dated February 17, 2008 which has the box "ARP/ARP appeal to be mailed" line checked. Taylor did not include the deadline date on the form as required by policy. (See Policy at R3:352, line 56-57). Taylor's grievance was subsequently dismissed on April 1, 2008 for failing to appeal to the Third Step within five (5) days of the receipt of the Second Step Response. (R1:047).

There is sufficient evidence to support a finding that Taylor was at fault for failing to submit his appeal in a timely manner. He had 5 days from the date he received his Second Step Response to file his appeal. He waited at least two days to ask for ILAP assistance and then failed to inform ILAP of his deadline date. Even if Taylor did timely file to the Third Step the relief sought could not be granted because Lt. Hand was no longer employed with MDOC which was ultimately what Taylor was requesting anyway.

The lower court did not err in dismissing Taylor's petition when after staying the case for 90 days, Taylor still failed to exhaust his administrative remedies on any issue presented to the court for judicial review. *See*, Miss. Code Ann. § 47-5-803(2); *Guy*, 915 So.2d at 510.

## **II. Whether Taylor Has Stated a Claim upon Which Relief May Be Granted.**

Taylor argues that the trial court improperly dismissed his complaint for failure to state a claim. The trial court found that Taylor had failed to exhaust his administrative remedies as required pursuant to Miss. Code Ann. § 47-5-801 through § 47-5-807 and therefore dismissed his petition for failure to state a claim. The Courts have repeatedly held that if the judgment of the circuit court can be sustained for any reason, it must be affirmed even though the trial judge based it upon the wrong legal reason. *Patel v. Telerent Leasing Corp.*, 574 So.2d 3, 6 (Miss. 1990), *Shewbrooks v. A.C. and S., Inc.*, 529 So.2d 557 (Miss. 1988). Miss. Code Ann. § 47-5-803(2), states that "[n]o state court shall entertain an offender's grievance or complaint which falls under the purview of the administrative review procedure unless and until such offender shall have exhausted the remedies as provided in

such procedure.” The lower court’s finding that due to his failure to exhaust his administrative remedies Taylor had failed to state a claim was not inaccurate because Taylor had failed to state any claim over which the court had jurisdiction for the purposes of judicial review. Accordingly, this issue is without merit.

### **III. Whether Taylor Was Denied His Right to Appeal the 9-3-08 Stay Order.**

Taylor attempted to appeal the lower court’s September 3, 2008 order staying the proceedings for 90 days for the purpose of allowing Taylor an opportunity to exhaust his administrative remedies. This appeal was dismissed on December 16, 2008 by Order of Justice George C. Carlson, Jr. for failure to pay the costs of the record on appeal. (R5:648). This issue is without merit as the 90 day stay had expired and Taylor’s petition had been dismissed by the trial court for failure to exhaust administrative remedies prior to the Supreme Court’s dismissal order.

Furthermore, Taylor’s appeal of the trial court’s order staying the proceedings for 90 days would have been an interlocutory appeal. Rule 5 of the Mississippi Rules of Appellate Procedure requires a party seeking an appeal from an interlocutory order to file a petition with the Clerk of the Supreme Court seeking permission to appeal. This procedure was not followed by Taylor and therefore the appeal was never properly before the court. *See, Lloyd G. Oliphant & Sons Paint Co., Inc. v. Logan*, 12 So.3d 614, 617-18 (Miss. Ct. App. 2009). This issue is without merit.

**IV. Whether Taylor Was Subjected to Retaliation for Exercising His First Amendment Right to Redress the Courts and for Filing Grievances Against CMCF and MSP Prison Staff and Medical Staff.**

Taylor contends that he has been retaliated against for filing the instant case and therefore this case should be reversed and remanded for a trial on all claims. This issue was not raised in the trial court and Taylor is therefore procedurally barred from raising it for the first time on appeal. *Douglas v. Blackmon*, 759 So.2d 1217, 1220 (Miss. 2000); *Davis v. State*, 684 So.2d 643, 658 (Miss. 1996). Furthermore, as with all claims against the MDOC or its employees, Miss. Code Ann. § 47-5-803 requires that the offender exhaust his administrative remedies before the claim may be addressed by the courts. A claim raised for the first time in a brief on appeal is procedurally barred.

**V. Whether Taylor Was Denied Access to the Court Contrary to MDOC Policies 20-02-01- and 31-01-01.**

Taylor contends that he has been denied access to the courts by Defendant Christie Scott and the CMCF law library.

There is no absolute right of access to the courts. All that is required is a reasonable right of access to the courts-a reasonable opportunity to be heard.” *Wayne v. Tenn. Valley Auth.*, 730 F.2d 392, 403 (5th Cir.1984) (cited with approval in *Townsend [v. Estate of Gilbert]*, 616 So.2d 333, 337 (Miss.1993)). While the right under our state and federal constitutions to access to our courts is a matter beyond debate, this right is coupled with responsibility, including the responsibility to comply with legislative enactments, rules, and judicial decisions.

*Thomas v. Warden*, 999 So.2d 842,846 (Miss. 2008), *quoting Arceo v. Tolliver*, 949 So.2d 691, 697 (Miss. 2009).

Taylor does not explain how he has been denied access to the courts or what cases if any have been dismissed because of the actions or inactions of the defendants. Taylor's right to reasonable access to the courts requires that he comply with Miss. Code Ann. § 47-5-801, *et seq.* Taylor's failure to comply with statutory exhaustion requirements or to follow MDOC policy and procedure regarding the administrative remedy process resulted in the dismissal of his complaint, not any action taken on the part of the defendants.

Additionally, the 672 page record in the case sub judice is evidence to the fact that the defendants have not prevented Taylor's access to the courts. The only intelligible claim that Taylor made in the lower court on this issue was in regards to filing a Third Step appeal regarding his grievance that he was sexually harassed by Lt. Charles Hand. As to this claim, the record shows that Taylor failed to notify ILAP of his filing deadline. The record also shows that the relief requested, MDOC action against Lt. Charles Hand, was unavailable because he was no longer employed by MDOC. Accordingly, this issue is without merit.

**VI. Whether Taylor Was Denied His Right to Appeal and Seek Judicial Review of RVR Appeal # 627330 Contrary to Miss. Code Ann. § 47-5-801 through 47-5-807 and Policy 18-01-01.**

Taylor alleges that after he commenced the present action he was beaten by staff and a cell phone, SIM card, and charger were planted on him and he was subsequently denied medical treatment. Taylor states that he received two rule violation reports (RVRs) in connection with the incident. Taylor states that when he appealed the RVRs one of them, RVR # 627330, was removed preventing him from being able to appeal it. Taylor seems to



be arguing the since the RVR was removed, i.e. dismissed, he could not appeal it and seek judicial review. The only reason to appeal an RVR is to have it overturned and the only reason to seek judicial review is to attempt to have the court overturn the RVR. If the RVR was dismissed then Taylor received the best result possible without having to actually take the appeal all the way to the courts.

Additionally, this matter is not properly before this court. As stated above an offender may not raise new claims without first exhausting his administrative remedies as to that claim. Taylor tries to circumvent this requirement by arguing that the new claim is related to the present matter. An RVR for assaulting an officer and for possession of a cell phone received after the present case was filed should not be automatically deemed so interrelated the instant case that it does not required exhaustion of administrative remedies. Accordingly, this matter is procedurally barred. *See*, Miss. Code Ann. § 47-5-803(2); *Douglas*, 759 So.2d at 1220.

#### **VII. Whether Taylor should have been granted Summary Judgment.**

Taylor argues that the trial court erred in denying his motion for summary judgment. The trial court properly denied Taylor's motion for summary judgment as the court did not have jurisdiction hear the matter because Taylor failed to exhaust his administrative remedies. The trial court had no authority to consider Taylor's claims on their merits because they were not properly before the court for judicial review. *See*, Miss. Code Ann. § 47-5-803.

**VIII. Whether Judge Ashley Hines should of [sic] recused himself for being bias[ed] and preduice[d].**

Taylor argues that Judge Ashley Hines erred when he refused to recuse himself from the instant case. The law concerning the recusal of a judge is well settled. An appellate court, in deciding whether a judge should have disqualified himself from hearing a case uses an objective standard under Canon 3 of the Code of Judicial Conduct. “A judge is required to disqualify himself if a reasonable person, knowing all the circumstances, would harbor doubts about his impartiality.” *Evans v. State*, 725 So.2d 613, 677 (Miss. 1997), *quoting Rutland v. Pridgen*, 493 So.2d 952, 954 (Miss. 1986). An issue of recusal is subject only to manifest error standard of review. *Scott v. State*, 8 So.3d 855, 859 (Miss. 2008). It is presumed that a judge is qualified and unbiased and that presumption must be overcome to prove manifest error. *Id.*

Taylor offers no justification as to why Judge Hines should have recused himself from hearing this case other than to state that “[t]he record on appeal is very clear that Judge Hines intentionally engaged in conduct that interfered with Taylor exercising his constitutionally protected right to institute the original complaint.” Taylor seems to believe that any adverse ruling by a judge is grounds for recusal. There is absolutely no evidence in the record that Judge Hines acted other than impartially and reasonably in his handling of this case nor is there any evidence of a manifest abuse of discretion on the part of the judge in failing to recuse himself from presiding over this cause. This issue is without merit.

## **CONCLUSION**

Based on the arguments of fact and law herein above, it is clear that the trial court did not commit reversible error and its decision dismissing Taylor's petition for failure to exhaust his administrative remedies should be affirmed.

Respectfully submitted,

DAVID PETRIE, MISSISSIPPI DEPARTMENT OF  
CORRECTIONS  
DEFENDANTS-APPELLEES

**JIM HOOD, ATTORNEY GENERAL  
STATE OF MISSISSIPPI**

JAMES M. "JIM" NORRIS  
SPECIAL ASSISTANT ATTORNEY GENERAL

JANE L. MAPP  
SPECIAL ASSISTANT ATTORNEY GENERAL  
MS BAR NO.: [REDACTED]

BY:  \_\_\_\_\_

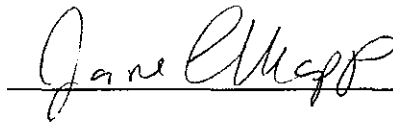
**CERTIFICATE OF SERVICE**

I, Jane L. Mapp, Special Assistant Attorney General for the State of Mississippi, do hereby certify that I have this day caused to be mailed, via United States Postal Service, first class postage prepaid, a true and correct copy of the foregoing **Brief of Appellees** in the above-styled and numbered cause to the following:

Hon. W. Ashley Hines  
Circuit Court Judge  
P.O. Box 1315  
Greenville, MS 38702-1315

Charlie Taylor, #R6798  
Unit 29-J  
Parchman, MS 38738

This, the 9<sup>th</sup> day of November 2009

A handwritten signature in cursive script, reading "Jane L. Mapp", written over a horizontal line.

Jane L. Mapp  
Special Assistant Attorney General

510 George Street, Suite 212  
Jackson, MS 39202  
Telephone: (601) 359-5770