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Richmond, Va.

209 VA 246

Record No. 6974

PETITION FOR A WRIT OF HABEAS CORPUS

In the Supreme Court of Appeals of Virginia at Richmond

WILLIAM ERNEST WRIGHT

v.

J. AUBREY MATTHEWS, JUDGE, ETC., ET AL.

RULE 5:12—BRIEFS

§5. Number of Copies. Twenty-five copies of each brief shall be filed with the clerk of this Court and three copies shall be mailed or delivered by counsel to each other counsel as defined in Rule 1:13 on or before the day on which the brief is filed.

§6. Size and Type. Briefs shall be nine inches in length and six inches in width, so as to conform in dimensions to the printed record, and shall be printed in type not less in size, as to height and width, than the type in which the record is printed. The record number of the case and the names and addresses of counsel submitting the brief shall be printed on the front cover.

HOWARD G. TURNER, Clerk.

Court opens at 9:30 a.m.; Adjourns at 1:00 p.m.

IN THE

Supreme Court of Appeals of Virginia

AT RICHMOND

Record No. 6974

VIRGINIA:

In the Supreme Court of Appeals held at the Supreme Court of Appeals Building in the City of Richmond on Wednesday the 14th day of June, 1967.

WILLIAM ERNEST WRIGHT, Petitioner,

against

J. AUBREY MATTHEWS, JUDGE OF THE CIRCUIT COURT OF WASHINGTON COUNTY, Respondent.

Upon a Petition for a Peremptory Writ of *Mandamus*

On consideration of the petition of William Ernest Wright praying that a peremptory writ of *mandamus* do forthwith issue, to be directed to the Honorable J. Aubrey Matthews, Judge of the Circuit Court of Washington County, respondent, requiring and commanding him to award petitioner a writ of *habeas corpus* and release him from custody, and for other relief, it is ordered that a rule do forthwith issue against the said respondent, returnable to this court on or before August 14, 1967, to show cause, if any he can, why a writ of *mandamus* should not issue as prayed, with leave hereby granted the said petitioner to file a reply thereto within 14 days after the respondent's answer is filed.

* * * * *

IN THE

Supreme Court of Appeals of Virginia

AT RICHMOND

VIRGINIA:

In the Supreme Court of Appeals held at the Supreme Court of Appeals Building in the City of Richmond on Tuesday the 10th day of October, 1967.

WILLIAM ERNEST WRIGHT, Petitioner,

against

J. AUBREY MATTHEWS, JUDGE OF THE CIRCUIT COURT OF WASHINGTON COUNTY, Respondent.

On further consideration of the petition filed herein on May 2, 1967, which petition will now be treated as a petition for a writ of *habeas corpus,* it is ordered that Guy T. Tripp, III, Esquire, a discreet and competent attorney at law, be, and he is hereby, appointed as counsel to represent the said petitioner in this proceeding.

* * * * *

IN THE

Supreme Court of Appeals of Virginia

AT RICHMOND

VIRGINIA:

In the Supreme Court of Appeals held at the Supreme Court of Appeals Building in the City of Richmond on Wednesday the 17th day of January, 1968.

WILLIAM ERNEST WRIGHT, Petitioner,

against

J. AUBREY MATTHEWS, JUDGE OF THE CIRCUIT COURT OF WASHINGTON COUNTY, (J. S. GATHRIGHT, SUPERINTENDENT OF BLAND CORRECTIONAL FARM, AND OTIS L. BROWN, DIRECTOR OF THE DEPARTMENT OF WELFARE AND INSTITUTIONS, SUBSTITUTED RESPONDENTS), Respondents.

Upon a Petition for a Peremptory Writ of *Mandamas* which is being treated as a Petition for a Writ of *Habeas Corpus*

On consideration of the amended petition of William Ernest Wright, filed herein by court-appointed counsel on January 4, 1968, praying that a writ of *habeas corpus ad subjiciendum* do forthwith issue, directed to J. S. Gathright, Superintendent of Bland Correctional Farm, and Otis L. Brown, Director of the Department of Welfare and Institutions, substituted respondents, it is ordered that a rule do forthwith issue against the said substituted respondents returnable to this court on or before the 18th day of March, 1968, to show cause, if any they can, why a writ of *habeas corpus* should not issue as prayed, with leave hereby granted the said petitioner to file a reply thereto within 14 days after the respondents' answer is filed.

* * * * *

IN THE

Supreme Court of Appeals of Virginia

AT RICHMOND

VIRGINIA:

In the Supreme Court of Appeals held at the Supreme Court of Appeals Building in the City of Richmond on Wednesday the 24th day of April, 1968.

WILLIAM ERNEST WRIGHT, Petitioner,

against

J. AUBREY MATTHEWS, JUDGE OF THE CIRCUIT COURT OF WASHINGTON COUNTY, (J. S. GATHRIGHT, SUPERINTENDENT OF BLAND CORRECTIONAL FARM, AND OTIS L. BROWN, DIRECTOR OF THE DEPARTMENT OF WELFARE AND INSTITUTIONS, SUBSTITUTED RESPONDENTS), Respondents.

Upon a Petition for a Writ of *Habeas Corpus*

On consideration of the amended petition for a writ of *habeas corpus ad subjiciendum* filed herein on January 4, 1968, by court-appointed counsel, respondents' motion to dismiss, and the petitioner's reply thereto, a writ of *habeas corpus ad subjiciendum* is awarded William Ernest Wright, to be directed to J. S. Gathright, Superintendent of Bland Correctional Farm, commanding him to have the body of the said William Ernest Wright in his custody as it is said, together with the day and cause of his being taken and detained, before this court on Tuesday, June 4, 1968, at 9:30 o'clock a.m., in the Supreme Court of Appeals Building in the City of Richmond.

Upon his motion, leave is granted the petitioner to proceed *in forma pauperis.*

On further consideration whereof, it is ordered that the record be printed; that the petitioner file with the clerk twenty-five printed copies of his brief on or before May 10, 1968; that the respondents file with the clerk twenty-five printed copies of their brief on or before May 24, 1968; and that the petitioner file with the clerk twenty-five printed copies of his reply brief, if any, on or before May 31, 1968, and the cause is continued.

A service of a copy of this order shall have the same force and effect as if a formal writ of *habeas corpus* were issued and served as required by law.

* * * * *

RECORD

AMENDED PETITION FOR WRIT OF *HABEAS CORPUS*

Petitioner William Ernest Wright, by counsel, petitions this Court to issue him a writ of *habeas corpus* as authorized by §88 of the Constitution of Virginia and Va. Code Ann. §17-97.

1. Petitioner is confined at Bland Correctional Farm pursuant to an order of the Circuit Court of Washington County, dated November 30, 1964, which set forth the court's finding that petitioner was guilty on nine counts of statutory burglary. By that order petitioner was sentenced to a term of twelve months in jail on each count, a total of nine years, but with all but five years suspended, and was ordered to pay the costs incident to the prosecutions. A copy of the order is attached to this petition as Exhibit A.

2. The costs assessed against petitioner, totaling $1,065.00, included at least $450.00 in fees paid to the three attorneys appointed by the court to defend petitioner on the nine charges of statutory burglary.

3. Petitioner has paid none of the costs assessed against him. If petitioner had paid these costs, he would have been released on September 11, 1967. Because his costs have not been paid petitioner is still confined at Bland Correctional Farm. He is not scheduled to be released until July 29, 1970. The only reason for his continued detention is his inability to pay costs of $1,065.00. See stipulation, marked Exhibit B.

4. Petitioner's continued confinement violates the 13th and 14th Amendments to the Constitution of the United States in the following respects.

Petitioner was constitutionally entitled to the assistance of defense counsel at his trial. Because petitioner was indigent, the Commonwealth was obligated to furnish him counsel. *Gideon* v. *Wainwright,* 372 U.S. 335 (1963). Petitioner now finds himself imprisoned for nearly three years because he availed himself of his rights and the Commonwealth fulfilled its constitutional obligation. Imprisonment in these circumstances violates the Due Process Clause of the 14th Amendment to the Constitution of the United States. Such imprisonment also violates the Equal Protection Clause of the 14th Amendment. *Ex Parte Wilson,* 89 Ohio L. Abs. 575, 183 NE 2d 625 (1962).

The costs assessed against petitioner were not part of the punishment imposed on account of his convictions of statutory burglary. Costs were assessed against him so that the Commonwealth might be reimbursed for its expenses connected

with its prosecutions of petitioner. *Kincaid* v. *Commonwealth,* 200 Va. 341, 105 S.E. 2d 846 (1958); *Commonwealth* v. *McCue,* 109 Va. 302, 63 S.E. 1006 (1909); *Anglea* v. *Commonwealth,* 10 Gratt. (51 Va.) 696 (1853). Imprisonment solely for the payment of costs is prohibited by the 13th Amendment to the Constitution of the United States. That Amendment provides:

"Neither slavery nor involuntary servitude, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction."

Petitioner's confinement and required labor at Bland Correctional Farm constitute "involuntary servitude" of the most obvious sort. He is being subjected to involuntary servitude on account of costs not assessed against him "as a punishment for crime." Therefore his confinement violates the 13th Amendment. The 13th Amendment prohibits the coercion of payment of a civil liability by means of criminal proceedings. *Pollock* v. *Williams,* 322 U.S. 4 (1944); *Taylor* v. *Georgia,* 315 U.S. 25 (1942); *United States* v. *Reynolds,* 235 U.S. 133 (1914); *Bailey* v. *Alabama,* 219 U.S. 219 (1911); *Peonage Cases,* 123 Fed. 671 (1903).

5. Petitioner is presently being restrained of his liberty by the respondents in violation of the Constitution of the United States, and petitioner therefore prays that the Court will grant his petition for a writ of *habeas corpus* and enter an order discharging him from custody.

WILLIAM ERNEST WRIGHT
No. B-16835

GUY J. TRIPP, III
By Counsel

Recd. 1-4-68. A. L. L.

* * * * *

EXHIBIT A

VIRGINIA:

Circuit Court of the County of Washington, on Monday, the thirtieth day of November, in the year of our Lord, nineteen hundred and sixty-four.

PRESENT:
The Honorable Thomas L. Hutton, Judge

COMMONWEALTH OF VIRGINIA
V. Indictment—A Felony—Statutory Burglary
WILLIAM ERNEST WRIGHT
COMMONWEALTH OF VIRGINIA
V. Indictment—A Felony—Statutory Burglary
WILLIAM ERNEST WRIGHT
COMMONWEALTH OF VIRGINIA
V. Indictment—A Felony—Statutory Burglary
WILLIAM ERNEST WRIGHT
COMMONWEALTH OF VIRGINIA
V. Indictment—A Felony—Statutory Burglary
WILLIAM ERNEST WRIGHT
COMMONWEALTH OF VIRGINIA
V. Indictment—A Felony—Statutory Burglary
WILLIAM ERNEST WRIGHT
COMMONWEALTH OF VIRGINIA
V. Indictment—A Felony—Statutory Burglary
WILLIAM ERNEST WRIGHT
COMMONWEALTH OF VIRGINIA
V. Indictment—A Felony—Statutory Burglary
WILLIAM ERNEST WRIGHT
COMMONWEALTH OF VIRGINIA
V. Indictment—A Felony—Statutory Burglary
WILLIAM ERNEST WRIGHT
COMMONWEALTH OF VIRGINIA
V. Indictment—A Felony—Attempted Statutory Burglary
WILLIAM ERNEST WRIGHT

This day came the Attorney for the Commonwealth; came the defendant in custody of the Sheriff of Washington County, and by his court-appointed attorneys, David D. Brown, Esquire, T. L. Hutton, Jr., Esquire, and David H. Frackelton, Esquire.

Thereupon, the cases were called, having heretofore been set for trial on this date; both sides announced ready; and by agreement of all parties, it is ordered that these cases be heard together. Mrs. Mary Jane Morgan, Court Reporter, was duly sworn in a manner prescribed by law.

Thereupon, the Court inquired of the three attorneys for the defendant if said attorneys had explained to the accused his right to a trial by jury and the nature and effect of a plea of guilty and said counsel answered in the affirmative. Thereupon, the Court explained to the accused in open court his right to a trial by jury and the nature and effect of a plea of guilty.

Thereupon, the defendant was arraigned and upon his arraignment entered in person a plea of guilty to each charge contained in the nine respective indictments herein, and no jury being demanded, the Court proceeded to hear and determine these cases without the intervention of a jury, and having heard the evidence and argument of counsel, the Court is of opinion to and doth find the defendant guilty as charged in each of the nine indictments, and doth fix the punishment of the defendant at twelve (12) months in jail on each of said indictments, or a total of nine years. Thereupon, the Court inquired of the defendant if he had anything to say or offer as to why the Court should not pronounce sentence in accordance with the findings of this Court and nothing being said or offered in delay of judgment, the Court doth hereby sentence the defendant to serve a term of twelve months in jail on each of said nine indictments, or a total of nine years, and that he shall pay the costs incident to these prosecutions.

It is further ORDERED that after the defendant has served a total of five years on the said nine charges that the Court doth hereby suspend the unserved portion of said sentences and doth ORDER that the defendant be released and placed on probation for a period of four years, upon the following conditions:

1. That he keep the peace and be of good behavior.
2. That he violate none of the penal laws of the Commonwealth of Virginia.
3. That he lead a clean life and obey the reasonable orders of his Probation Officer.

It is further ordered that David D. Brown, T. L. Hutton, Jr., and David H. Frackelton, attorneys heretofore appointed by the Court to represent the defendant in these cases, be allowed the sum of $50.00 in each case for their services herein, and that the Court Reporter be allowed the sum of $10.00.

The Court doth certify that the defendant was present during the entire proceedings herein.

Thereupon, the defendant is remanded to jail to serve said jail sentence herein imposed, and to serve such time as may be required by law to pay the costs herein, unless said costs are sooner paid.

A Copy—Teste:

LUCILLE VAN DEVENTER, Deputy Clerk.

* * * * *

EXHIBIT B

COMMONWEALTH OF VIRGINIA

[SEAL]

Office of the Attorney General
Richmond 23219

January 2, 1968

Guy T. Tripp, III, Esquire
Attorney at Law
700 East Main Street
Richmond, Virginia 23219

Re: William Ernest Wright v. J. Aubrey Mathews

Dear Guy:

Enclosed is a copy of the letter sent to us by J. S. Gathright, the Superintendent of Bland Correctional Farm, showing the sentences imposed upon petitioner on November 30, 1964.

We will be glad to stipulate that his present incarceration is the result of costs imposed.

Very truly yours,
OVERTON P. POLLARD
Assistant Attorney General

OPP:lp

Enclosure

Received Jan. 3, 1968.

HUNTON, WILLIAMS GAY,
POWELL & GIBSON

* * * * *

COMMONWEALTH OF VIRGINIA

[SEAL]

DEPARTMENT OF WELFARE AND INSTITUTIONS

July 10, 1967

Honorable Reno S. Harp, III
Assistant Attorney General
Commonwealth of Virginia
Attorney General's Office
Richmond, Virginia

RE: WRIGHT, William Ernest—Our Number: B-16835

Dear Sir:

With reference to a telephone conversation of July 7, 1967 with Mr. Cochran regarding the above named inmate, we are listing below information your office requested.

According to our records, subject was arrested and placed in jail on May 11, 1964 in Washington County, Virginia and tried on November 30, 1964 in the Circuit Court of Washington County and received the following felony sentences:

Statutory Burglary—12 Months—$ 135.00 Cost
Statutory Burglary—12 Months—$ 116.75 Cost
Statutory Burglary—12 Months—$ 116.75 Cost
Statutory Burglary—12 Months—$ 116.75 Cost
Statutory Burglary—12 Months—$ 117.75 Cost
Statutory Burglary—12 Months—$ 116.75 Cost
Statutory Burglary—12 Months—$ 116.75 Cost
Statutory Burglary—12 Months—$ 111.75 Cost
Att. Statutory Burglary—12 Months—$ 116.75 Cost

According to the attached letter dated February 11, 1965, after subject has served the first five (5) sentences, the unserved portion of the sentences are to be suspended. We are attaching official photostatic copies of the court orders also.

Subject's scheduled release date is July 29, 1970. Should his above fine and costs be paid, his release date would change to September 11, 1967.

Yours very truly,
J. S. GATHRIGHT
Superintendent

JSG/jam

* * * * *

MOTION TO DISMISS

Now comes the respondents, by counsel, and file their Motion to Dismiss to the petition for a writ of *habeas corpus* and say:

1. § 19.1-320 of the Code of Virginia, 1950, requires the Clerk of the Circuit or Corporation Court in which the accused is convicted, to prepare a statement of all expenses incident to the prosecution.

2. §§ 17-30.1 and 17-30.2 of the Code of Virginia, 1950, as amended, provide that upon conviction of the accused, all costs paid by the Commonwealth shall be assessed against the defendant.

3. § 14.1-184 of the Code of Virginia, 1950, provides that in the event of the conviction of the indigent accused, the amount allowed by the Court to the attorney appointed to defend the accused, shall be taxed against the defendant as a part of the costs of the prosecution.

4. § 19.1-334 of the Code of Virginia, 1950, provides for confinement in jail for non-payment of fines, or of fines and costs.

5. § 53-135.1 of the Code of Virginia, 1950, provides for confinement at any state farm or convict road camp for non-payment of fines, or of fines and costs.

6. The Constitutional propriety of confinement for non-payment of fines, or of fines and costs, has long since been settled in this Commonwealth, *May* v. *Dillard,* 134 Va. 707, 114 S.E. 593 (1922)

7. Respondents say that the petition is devoid of unrecorded matters of fact; therefore, respondents submit that there is no need for a plenary hearing. § 8-598 of the Code of Virginia, 1950, as amended.

8. Respondents deny each allegation contained in the petition for a writ of *habeas corpus* not expressly admitted.

Wherefore, respondents pray that the petition for a writ of *habeas corpus* be denied and dismissed.

J. AUBREY MATTHEWS,
Judge of the Circuit Court of
Washington County, (J. S.
Gathright, Superintendent of
Bland Correctional Farm, and
Otis L. Brown, Director of the
Department of Welfare and
Institutions, Substituted
Respondents),

By: GERALD L. BALILES
Counsel

Received Mar. 19, 1968 Clerk Supreme Court of Appeals Richmond, Virginia.

* * * * *

ANSWER TO MOTION TO DISMISS

Petitioner William Ernest Wright, by counsel, answers Respondents' Motion to Dismiss and says:

Respondents cite Va. Code §§ 14.1-184, 17-30.1, 17-30.2, 19.1-320, 19.1-334 and 53-135.1, relating to assessment and enforcement of costs in criminal cases. Respondents apparently take the position that these Code sections authorize Petitioner's present confinement. However, none of the sections cited by Respondents authorize confinement for non-payment of costs.

It would appear that Va. Code § 19.1-328, not cited by Respondents, purports to authorize such confinement. However, Petitioner has no obligation to point out the authority upon which the State might base its claim that Petitioner's confinement is authorized. Petitioner urges that his confinement for non-payment of costs, regardless of its basis, violates the Thirteenth and Fourteenth Amendments to the Constitution of the United States.

Respondents say that confinement for non-payment of costs was approved in *May* v. *Dillard,* 134 Va. 707, 114, S.E. 593 (1922). The only constitutional question raised in that case was one of double jeopardy under the Fifth Amendment to the Constitution of the United States and Section 8 of the Constitution of Virginia. The Court's opinion does not mention either the Thirteenth or Fourteenth Amendment. The second point in *May* v. *Dillard, supra,* involved a determination of which of two statutes was applicable to the facts of the case. This decision, the only one cited by Respondents, has no bearing upon the constitutional questions raised by Petitioner's Amended Petition for a Writ of *Habeas Corpus.*

Petitioner agrees with Respondents' statement in paragraph 7 of their Motion to Dismiss that his petition "is devoid of unrecorded matters of fact; therefore, Respondents submit that there is no need for a preliminary hearing." Therefore, this Court can proceed forthwith to determine the constitutional questions raised and, if the Court is so disposed, grant Petitioner the relief he seeks.

Wherefore, Petitioner prays that Respondents' Motion to Dismiss be denied, and that he be heard, by counsel, at the Court's earliest opportunity.

WILLIAM ERNEST WRIGHT, #B-16835

By GUY T. TRIPP, III
Counsel

Rec'd. 3-27-68. H. G. T.

* * * * *

PETITIONER'S WAIVER OF PERSONAL APPEARANCE

Petitioner, William Ernest Wright, hereby waives his right to be personally present when his Petition and Amended Petition for a Writ of *Habeas Corpus* are argued to the Supreme Court of Appeals of Virginia during its June term, 1968. Petitioner, upon advice by counsel, argees that his Petitions be presented and argued in his absence.

WILLIAM ERNEST WRIGHT, Petitioner

April 18, 1968
Date

STATE OF VIRGINIA)
) To-wit:
COUNTY OF BLAND)

I, L. A. Cochran, a Notary Public in and for the jurisdiction aforesaid, certify that William Ernest Wright, whose name is signed to the foregoing Petitioner's Waiver of Personal Appearance, dated April 18, 1968, acknowledged the same before me in my jurisdiction aforesaid this 18 day of April, 1968.

My commission expires: August 30, 1969.

L. A. COCHRAN
Notary Public
Bland County

Recd. 4-19-68. H. G. T.

* * * * *

STIPULATION OF FACTS

Petitioner, William Ernest Wright, was tried in the Circuit Court of the County of Washington on November 30, 1964 on eight indictments for statutory burglary and one indictment for attempted statutory burglary. Petitioner, an indigent, was represented by three court-appointed attorneys. He entered a plea of guilty on each of the nine indictments and the trial court found Petitioner guilty as charged on each indictment. Punishment was fixed at "twelve (12) months in jail on each of the said indictments, or a total of nine years." The Court ordered that "after the defendant has served a total of five years on the said nine charges that the Court doth hereby suspend the unserved portion of said sentences and doth ORDER that the Defendant be released and placed on probation for a period of four years."

Thereupon, the Defendant was remanded to jail to serve said jail sentence herein imposed, "and to serve such time as may be required by law to pay the costs herein, unless said costs are sooner paid." The Clerk of the Circuit Court of the County of Washington determined that a total of $1,064.75 in costs should be assessed against Petitioner as a result of his trial on the nine indictments. (See Exhibits A-J)

Petitioner's five-year sentence would have ended on September 11, 1967, allowing credit for good behavior. However, petitioner is now confined at Bland Correctional Farm and is not scheduled to be released until July 29, 1970. The Commonwealth's sole ground for imprisoning petitioner from September 11, 1967, until July 29, 1970 is petitioner's failure to pay $1,064.75 costs. Petitioner is indigent and unable to pay these costs.

Seen and agreed to:
GERALD L. BALILES
Assistant Attorney General

GUY T. TRIPP, III
Attorney for Petitioner

Recd. 4-29-68. A. L. L.

EXHIBIT A

WILLIAM ERNEST WRIGHT
STATUTORY BURGLARY & ATTEMPTED
STATUTORY BURGLARY.
INDICTMENTS: Nos. 11-64-4 thru Nos. 11-64-12

Warrant $2.00

Trial—County Court	2.00
Clerk	21.25
Sheriff Fees	9.50
Witnesses	
Commonwealth Attorney	15.00
Atty. County Court	25.00
Atty. Circuit Court	50.00
Court Reporter—Circuit Ct.	10.00
Total Costs	$134.75

EXHIBIT B

WILLIAM ERNEST WRIGHT
STATUTORY BURGLARY & ATTEMPTED STATUTORY BURGLARY.
INDICTMENTS: Nos. 11-64-4 thru Nos. 11-64-12

Warrant	$2.00
Trial—County Court	2.00
Clerk	21.25
Sheriff Fees	1.50
Witnesses	
Commonwealth Attorney	15.00
Atty. County Court	25.00
Atty. Circuit Court	50.00
Total Costs	$116.75

EXHIBIT C

WILLIAM ERNEST WRIGHT
STATUTORY BURGLARY & ATTEMPTED STATUTORY BURGLARY.
INDICTMENTS: Nos. 11-64-4 thru Nos. 11-64-12

Warrant	$2.00
Trial—County Court	2.00
Clerk	21.25
Sheriff Fees	1.50
Witnesses	
Commonwealth Attorney	15.00
Atty. County Court	25.00
Atty. Circuit Court	50.00
Total Costs	$116.75

EXHIBIT D

WILLIAM ERNEST WRIGHT
STATUTORY BURGLARY & ATTEMPTED
STATUTORY BURGLARY.
INDICTMENTS: Nos. 11-64-4 thru Nos. 11-64-12

Warrant	$2.00
Trial—County Court	2.00
Clerk	21.25
Sheriff Fees	1.50
Witnesses	
Commonwealth Attorney	15.00
Atty. County Court	25.00
Atty. Circuit Court	50.00
Total Costs	$116.75

EXHIBIT E

WILLIAM ERNEST WRIGHT
STATUTORY BURGLARY & ATTEMPTED
STATUTORY BURGLARY.
INDICTMENTS: Nos. 11-64-4 thru Nos. 11-64-12

Warrant	$2.00
Trial—County Court	2.00
Clerk	21.25
Sheriff Fees	1.50
Commital	1.00
Commonwealth Attorney	15.00
Atty. County Court	25.00
Atty. Circuit Court	50.00
Total Costs	$117.75

EXHIBIT F

WILLIAM ERNEST WRIGHT
STATUTORY BURGLARY & ATTEMPTED
STATUTORY BURGLARY.
INDICTMENTS: Nos. 11-64-4 thru Nos. 11-64-12

Warrant	$2.00
Trial—County Court	2.00
Clerk	21.25
Commonwealth Attorney	15.00

Sheriff	1.50
Atty. County Court	25.00
Atty. Circuit Court	50.00
Total Costs	$116.75

EXHIBIT G

WILLIAM ERNEST WRIGHT
STATUTORY BURGLARY & ATTEMPTED STATUTORY BURGLARY.
INDICTMENTS: Nos. 11-64-4 thru Nos. 11-64-12

Warrant	$2.00
Trial—County Court	2.00
Clerk	21.25
Commonwealth Attorney	10.00
Sheriff	1.50
Atty. County Court	25.00
Atty. Circuit Court	50.00
Total Costs	$111.75

EXHIBIT H

WILLIAM ERNEST WRIGHT
STATUTORY BURGLARY & ATTEMPTED STATUTORY BURGLARY.
INDICTMENTS: Nos. 11-64-4 thru Nos. 11-64-12

Warrant	$2.00
Trial—County Court	2.00
Clerk	21.25
Commonwealth Attorney	15.00
Sheriff	1.50
Atty. County Court	25.00
Atty. Circuit Court	50.00
Total Costs	$116.75

EXHIBIT I

WILLIAM ERNEST WRIGHT
STATUTORY BURGLARY & ATTEMPTED
STATUTORY BURGLARY.
INDICTMENTS: Nos. 11-64-4 thru Nos. 11-64-12

Warrant	$2.00
Trial—County Court	2.00
Clerk	21.25
Commonwealth Attorney	15.00
Sheriff	1.50
Atty. County Court	25.00
Atty. Circuit Court	50.00
Total Costs	$116.75

EXHIBIT J

SUMMARY OF COSTS

Warrant	$18.00
Trial—County Court	18.00
Clerk	191.25
Sheriff Fees	21.50
Witnesses	
Commonwealth Attorney	130.00
Atty. County Court	225.00
Atty. Circuit Court	450.00
Court Reporter—Circuit Ct.	10.00
Commital	1.00
TOTAL COSTS	$1,064.75

* * * * *

A Copy—Teste:

Howard G. Turner, Clerk.

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