

State of South Carolina
In The Supreme Court

Certiorari to the Court of Appeals
Appeal from Calhoun County
Hon. Edgar W. Dickson, Circuit Court Judge
Appellate Case No. 2022-001440

The State, Respondent,
V.

Jason Harris Peele, Pro-Se Petitioner,

Reply to

Return to Petition For Writ of Certiorari
To The Court of Appeals

Nov. 22, 2022

Jason H. Peele #316893
Kershaw Corr. Inst. PB-27
4848 Goldmine Hwy
Kershaw SC, 29067

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S.C. SUPREME COURT

REPLY

I'm writing this reply in response to the Return I received from SADA G William M. Blich Jr. on Nov. 21, 2022.

After reading and taking my time to study the situation in its entirety and applying my best understanding of all facts and applicable rules, I do believe a situation such as mine does indeed fit the criteria for Certiorari. There are indeed extraordinary facts and circumstances present that lead me to interpret my case to be exact in nature to the type that The Petition For Writ of Certiorari was created to address to begin with.

According to my understanding and interpretation of the rules and procedures in question, I believe a prima facie showing of merit has been met. A prima facie showing of irreparable harm is evident in the 27 year sentence I received instead of the 15.45 years as promised verbally and in writing. Substantial Justice demands the issuance of a Writ. The fact that I've had to represent myself because my most recent counsel (B. Stevens) made it impossible for me to receive assistance of counsel at the Court of Appeals level due to his refusal to respond on my behalf or remove himself as counsel altogether. This only goes to further show and substantiate the types of errors and gross miscarriages of justice I've experienced throughout the entire duration of my incarceration. The issues I've raised are legitimate and can be confirmed through transcripts, case files, and testimony.

I know the purpose of this reply is not to bring up and discuss arguments I've already presented from the start of this process. I wish to briefly mention two key points that can easily be verified and counted as a *prima facie* showing of merit so that the record can accurately reflect I do indeed have arguable basis for appeal and/or Certiorari. These two points are as follows:

1. Change of Venue. The change of venue quite obviously affected the outcome of my hearing. It denied me the right of due process as promised by law. It caused two witnesses on my behalf to be denied the opportunity to state in open court and on the record major facts and knowledge of the situation that would've greatly impacted the outcome. This change of venue took place without my knowledge or consent. This in and of itself should be arguable grounds for appeal.
2. The copy of the mitigation package I submitted copies of to both the Supreme Court and the Attorney General's Office with my worst case scenario of 15.45 years should also be considered. This document is proof of the promise made that was not kept. It's no longer just my word but an actual piece of physical evidence that confirms the injustice in my case and supports my appeal for this honorable court to step in and aid me in correcting these violations of my rights and liberty.

Those are just two out of a long list of issues in my case. I hope and pray that this court will take all of those issues into consideration. As a Pro Se petitioner I should not be held to the same standard of measure as an actual attorney. My inability to properly word or draft a document in my own defense in accordance with the rules of court and procedure should not discredit the authenticity or seriousness of the issues raised in the letters and documents I have submitted to this court. The 14th Amendment guarantees me due process and equal protection under the law. If unknowingly and involuntarily I entered into any agreement that waived any of my rights due to misleading by then attorney (Breen Stevens), then my Constitutional Rights should supercede any state level law or rules of court and provide me with the consideration and protection promised by those Amendments; 5th, 6th, 14th

Therefore, I humbly ask that this Honorable Court please continue it's review and consideration and grant my Petition For Writ Of Certiorari.

Respectfully Submitted,

Jason Peele

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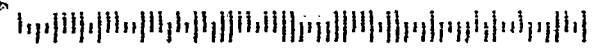
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The Supreme Court of South Carolina
Patricia A. Howard, Clerk of Court
P.O. Box 11330
Columbia SC, 29211

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