

2013-UP-216

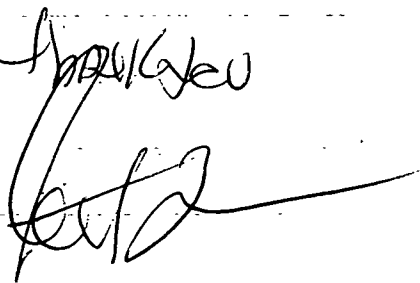
6/5/13

Hon. Jerry Abbott Kitchens
Clerk of Court
STATE V KOON

Robert Koon
2278db
LIEBEN CJ
RIDGEVILLE SC
28472

PLEASE FIND ATTACHED A SUPPLEMENTAL
EXHIBIT IN MY MOTION TO PROCEED PRO SE
ON REHEARING AS COUNSEL HAS ABANDONED
APPELLANT AND HE IS NOW PRO SE, AND
ASICU COURT TO REMAND CASE TO
CHESTER CO. TO HEAR DETECTIVE
RICHARD WEAVER TESTIMONY.

WOULD YOU PLEASE SEND ME A
COPY OF PRO SE MOTION FOR REHEARING
INTER ALIA, AND ENCLOSED FOR
PETITION FOR CERTIORARI RECORDS
OR CITE ME THE COST.

Approved


RECEIVED

JUN 10 2013

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

STATE

Respondent

v.

ROBERT H. KOON

Appellant

Appellate # 2011-20068

~~2003~~ - UP - 216

SUPPLEMENTAL EXHIBIT IN RE:

TO MOTION TO PROCEED PRO SE
ON REHEARING, MOTION TO RELIEVE COUNSEL
AND MOTION TO REMAIN MOTION **RECEIVED**
REHEARING AND EN BANC JUN 10 2013
SC Court of Appeals

Appellant COUNSEL, HAVING FAILED TO BRIEF
OF POLICE/PROSECUTORIAL MISCONDUCT ISSUES
REFERENCE @ FN 2 of opinion, has
abandoned the Appellant, who has
steadfastly moved for FIRST OUTSIDE
COUNSEL, then to proceed pro se
UNDER SC CONSTITUTION, BASED ON
FACT Appellate DEFENSE ACTED UNDER
A CONFLICT OF INTEREST THAT EFFECTED
the accuracy of the Representation, to
POINT where Appellate DEFENSE

① Refused to make a fact specific
MOTION to Remand to show Appellant
could not raise his prosecutorial
misconduct issue's without Det. Weaver
who could not be located for DJ (b)
even by solicitors investigators.

The Thrust of prose 29(b) was
prosecutorial misconduct of police
in a pattern per Rule 406, Habit,
on Routine Evidence, Richard
Weaver testimony went to the issue
that could not be presented without it
WEAVER, AND SOLICITOR, PROSECUTORIAL
MISCONDUCT IN OBTAINING WARRANT AND
INDICTMENT BASED UPON A KNOWN
FALSE AFFIDAVIT.

Appellant seeks to proceed pro se
As attached letter of Pachank states
he will not pursue the appeal.

And Appellant seeks a Rehearing
on the MOTION to Remand that
has been provided to the court.

ON REMAND Appellant can present
WEAVER to establish a FALSE AVOWMENT
in ANNEST AFFIDAVIT that was KNOWINGLY
USED by Solicitor,
RIDDLE v. COMINT 631 S.E.2d 70 (2006)
WEAVER testimony will show a CONNECTION
IN THE CHAIN OF MISCONDUCT (Rule 400)
AND I Respectfully seek a REMAND,
AND to proceed PRO SE AS COUNSEL
HAS ABANDONED Appellant!

Paul Kendall

LIEBEL CT
PO BOX 205
Ridgewood SC 29472

CENT OF SERVICE

A TRUE COPY WAS SERVED BY
DONALD JOHN ZELENSKI
PO BOX 11549

COLUMBIA SC 29211 This 5 of June
2015 by US MAIL

J. Newirth



SCCID

SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

Division of Appellate Defense
1330 Lady Street, Suite 401
Columbia, South Carolina 29201-3332
Post Office Box 11589
Columbia, South Carolina 29211-1589
Telephone: (803) 734-1330
Facsimile: (803) 734-1397

Robert M. Dudek, Chief Appellate Defender
Wanda H. Carter, Deputy Chief Appellate Defender

May 30, 2013

Mr. Robert H. Koon, #227826
Lieber Correctional Institution
PO B ox 205
Ridgeville, SC 29472

Re: Your case

Dear Mr. Koon:

I will not be filing for a rehearing in your case. I really did not see anything in the Court of Appeals opinion that I could successfully take issue with in the Supreme Court.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Robert M. Pachak
Appellate Defender

RMP/eab