

RECEIVED

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

MAR 22 2023

SC Court of Appeals

DAVID ANTONIO LITTLE, JR.,)
) APPELLANT,)
))
v.)
))
THE STATE,)
) RESPONDENT)

APPELLATE CASE NO. 2021-000990

MOTION TO RAISE ADDITIONAL
CLAIMS OF DEFENSE ON
DIRECT APPEAL

I, DAVID ANTONIO LITTLE, JR., BY AND THROUGH THE UNDERSIGNED COURT APPOINTED ATTORNEY WANDA H. CARTER, HEREBY CERTIFY THAT I HAVE MADE KNOWN TO THE APPOINTED COUNSEL THE DESIRE TO RAISE ADDITIONAL CLAIMS FOR MY DEFENSE IN WHICH HAVE BEEN DENIED. PURSUANT TO RULE 1.3, 1.4 OF RULES OF PROFESSIONAL CONDUCT. THEREFORE, I THE APPELLANT WOULD REQUEST THAT THIS COURT GRANTS THE FOLLOWING WITHOUT PREJUDICE.

1 ADDITIONAL CLAIMS

1. PURSUANT TO 28 C.F.R. § 549.43, THE STATE HAS FAILED IN THE ADMINISTRATIVE PROCEEDING AND HAS PREJUDICED THE APPELLANT'S RIGHTS BY DENYING DUE PROCESS. [SELL V. U.S.] [RIGGINS V. NEVADA]

2. THE COURT FAILED TO MAKE ANY FINDINGS ON THE RECORD THAT APPELLANT NEEDED TO WEAR SEIN BELT AT TRIAL. BY DOING SO, THE STATE HAS VIOLATED COURT DUE PROCESS AND HAS VIOLATED THE SIXTH AMENDMENT AND FOURTEENTH AMENDMENT WHICH GUARANTEES FAIR TRIAL. [PEOPLE V. BOOSE], [PEOPLE V. HALL], [YOUNGBLOOD V. WEST VIRGINIA], [GONZALEZ V. PULER], [PEOPLE V. ALLEN], [WRINKLES V. STATE]

3. THE APPELLANT'S FREEDOM OF THOUGHT, RIGHT TO BODILY INTEGRITY, RIGHT TO REFUSE UNWANTED MEDICAL TREATMENT, OR RIGHT TO PRIVACY, UNDER THE FIFTH AMENDMENT DUE PROCESS CLAUSE AS A LIBERTY INTEREST OR RIGHT TO PRIVACY, OR AN ASPECT OF THE RIGHT TO PRIVACY CONTAINED IN THE NOTIONS OF PERSONAL FREEDOM WHICH UNDERWROTE THE BILL OF RIGHTS WAS VIOLATED. [U.S. V. CHARTERS], [STATE V. DEBRA A.E.] [ROE V. WADE], [HARPER V. WASHINGTON]

4. COUNSEL AT LAW, TONYA COPELAND-LITTLE WAS INEFFECTIVE FOR A NUMBER OF REASONS PURSUANT TO RULES OF PROFESSIONAL CONDUCT, RULE 1.1-1.4 FOR THE FOLLOWING REASONS:

A. TONYA COPELAND-LITTLE FAILED TO WRITE OR VISIT APPELLANT PRIOR TO TRIAL ONLY GIVING THE APPELLANT 72 HOURS NOTICE.

B. TONYA COPELAND-LITTLE FAILED TO PREPARE A DEFENSE PRIOR TO TRIAL. [DAVIE V. STATE]

C. TONYA COPELAND-LITTLE FAILED TO MAKE MENTION OF THE FORCED ANTIPSYCHOTICS ADMINISTERED TO APPELLANT ON FEBRUARY 16, 2021 BEFORE WHICH MY MIRANDA RIGHTS OR A WARRANT WAS GIVEN TO ME UNTIL FEBRUARY 17, 2021, AFTER THE FACT OF HAVING MY CONSTITUTIONAL RIGHTS VIOLATED. [MIRANDA V. ARIZONA]

D. TONYA COPELAND-LITTLE FAILED TO PROVE OR ACKNOWLEDGE THE FACT THAT STATE PSYCHIATRIST MATTHEW GASKINS DID PERJURE THE JURY BY MAKING FALSE TESTIMONY.

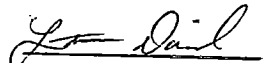
E. TONYA COPELAND-LITTLE FAILED TO PROVE THAT I WAS UNLAWFULLY ARRESTED PURSUANT TO MAGNA CARTA. [JOHN BAD ELK V. U.S.] [KING V. CURVAN], [STATE V. FRANCIS], [STATE V. BETHUNE] SEE; UNHAND ME, GENTLEMEN! THE RIGHT TO RESIST UNLAWFUL ARREST IN SOUTH CAROLINA - J. CHRISTOPHER CLARK

WHEN IT COMES TO THE CONCLUSION OF ~~HYBRID~~ HYBRID REPRESENTATION I THE APPELLANT PRAYS THAT THIS COURT CONSIDER THE FACTS AT HAND AND TAKE NOTE THAT MY CONSTITUTIONAL RIGHTS HAVE BEEN AND ARE STILL BEING VIOLATED DUE TO MY INDIGENT STATUS. [ISBILL V. STOVALL] [16AM JUR 2D., SEC. 117], [16AM JUR 2D., SEC. 258]

"IT IS THE DUTY OF THE COURTS TO BE WATCHFUL FOR THE CONSTITUTIONAL RIGHTS OF THE CITIZEN AND AGAINST ANY STEALTHY ENCROACHMENTS THEREON!" [BOYD V. U.S., 110 U.S. 616, 635]

THEREFORE, THE APPELLANT PRAYS FOR THE RELIEF OF THIS COURT AND ASK THAT THIS MOTION IS NOT PREJUDICED.

MARCH 19, 2023

RESPECTFULLY,

 DAVID ANTONIO LITTLE, JR.

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CERTIFICATE OF SERVICE

I, DAVID ANTONIO LITTLE, JR., BY AND THROUGH UNDERSIGNED ATTORNEY, HEREBY CERTIFY THAT I HAVE MOVED TO ADD ADDITIONAL CLAIMS TO MY DEFENSE THAT SHALL BE CONSIDERED WHILE DIRECT APPEAL IS STILL PENDING.

RESPECTFULLY,

David Little

DAVID ANTONIO LITTLE, JR.

MARCH 19, 2023

DAVID LITTLE # 385407
386 REDEMPTION WAY
MCCORMICK, SC 29894

AUGUSTA, GA 30901

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CLERK OF COURT
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