

In The Supreme Court Of South Carolina RECEIVED

Appeal From Horry County NOV 08 2023  
Court Of Common Pleas SC Court of Appeals

Honorable R. Ferrell Cothran Jr. Circuit Court Judge  
Honorable William H. Seal, Jr. Circuit Court Judge  
Honorable H. Bruce William Appeal Court Judge  
Honorable John Geathers Appeal Court Judge  
Honorable Jenny A. Kitching Appeal Court Clerk  
Honorable Jerry D. Vinson Appeal Court Judge  
Honorable Stephanie P. McDonald Appeal Court Judge  
Honorable E. Lockemy James Appeal Court Judge

Case # 2021-001271

Jamie Goss

Appellant

v

Mark Raymond

Respondent

Jamie Goss 294885  
R.C.I./BA-02  
P.O. Box 2039  
Ridgeland S.C 29936

## Statement Of The Case

Petitioner file Pro Se Motion for Compassionate release under extraordinary Circumstance in the jurisdiction of Horry County Court of Common Pleas Presiding Honorable R. Ferrell Cothran Jr. denied aforesaid motion consequently Closing case. Petitioner appeal drafting a motion to amend Supplement fact finding under provision of S.C.R.P. 59(e) and 52(b) and Humbert, V. State 345 S.C. 332, 548 S.E. 2d June and Marlar V. State 375 S.C. 407, 653 S.E. 2d 266 Nov. 5 2007 Question of Law and fact later denied by Honorable William H. Seal. Petition appeal for emergency extraordinary Circumstance bond Honorable Chief Bruce William denied motion and Rehearing was later denied. Later the Court of Appeal dismissed Petition appeal by Honorable John Geather, Petition file motion for Rehearing, which was denied by Honorable Jerry D. Vinson, Honorable Stephanie P. McDonald, Honorable E. James Lockemy. Later Petition draft motion for rehearing and En Banc, still pending in the Court of Appeal and Writ of Certior

## Emergency Bail for Extraordinary Reason A Call for Urgent Action

The current state of our prison system is nothing short of a crisis, with a severe shortage of staff in every department and overcrowded prison. It has become increasingly difficult to provide even the most basic services to inmates. This article aims to shed light on the dire circumstances faced by prisoners and the urgent need for emergency bail or bond for Extraordinary Reason.

### Shortage of Staff and Overcrowded

Prison One of the most pressing issues plaguing our prison system is the acute shortage of staff. With limited personnel available to handle the vast number of inmates, it is nearly impossible to ensure their well-being and proper care. This shortage has far reach consequences, affecting everything from security to healthcare and legal assistance. Moreover, the overcrowding of prison exacerbates

these problem with a staggering number of inmates crammed into limited space, it becomes increasingly challenging to maintain order and provide adequate facilities and resources. This overcrowding also puts immense strain on the already burdened staff, leading to further inefficiencies and increased risk for both inmates and personnel.

### Lack of Training and Resources

Another critical issue that plagues our prison system is the lack of training for both inmates and staff. Inmates in legal matters, making it extremely difficult for them to navigate the complex legal system. The absence of a well equipped law library with only two computers available for over a thousand inmates compounds this issue further. Additionally, the limited access to the law library which is frequently closed for extended periods due to hospital duties, severely hampers inmates ability to meet court deadlines

or seek legal assistance. Furthermore, the tablet provided in cells as an alternative app and extremely poor Wi-Fi connection rendering it virtually useless,

### Inadequate Hygiene and Healthcare

The deplorable conditions within the prison system extend to basic hygiene and healthcare. Inmates are unable to wash as they should on a daily basis, leading to severe bacterial infection that can cause irreparable harm. The lack of proper cleaning chemicals for showers and toilets only exacerbates this problem creating an unhygienic environment that poses a significant risk to inmates' healths. Furthermore, the poor air circulation in the cells with limited ventilation, results in a foul odor permeating the space. This not only causes discomfort but also contributes to breathing problems among inmates aggravating existing respiratory

Condition Inadequate bedding, with beds and mats too small for larger individuals lead to chronic pain and discomfort, further deteriorating prisoners well-being.

### Limited Communication and Support

One of the most heartbreaking aspects of the current state of affairs is the limited communication and support available to inmates with only four phone calls allowed per week, inmates are hindered from seeking help during emergencies or staying connected with their families. This restriction not only isolates inmates from their loved ones but also hinders their ability to address urgent matters, such as court related issues or family emergencies. Furthermore the lack of designated areas for eating or engaging in activities such as writing letter or doing legal work further isolates

inmates and restricts their ability to access essential resources. Additionally, problems with roommates, such as unauthorized individuals entering cells and theft of personal belongings go unaddressed due to the absence of effective measures to protect inmates' property and wellbeing.

### Unpaid Labor and Unmet Healthcare Needs

The dire situation within our prison system is further exacerbated by the exploitation of inmates through unpaid labor. With only 100 jobs available for over a thousand inmates, the work environment is chaotic and messy. Inmates are forced to work without receiving any compensation, leading to a sense of hopelessness and frustration. Moreover, the inadequate healthcare provided within the prison system fails to address the pressing needs of inmates, many

Suffer from significant dental issues with missing teeth which remain unattended. The lack of appropriate medical assistance for breathing problems and skin conditions further compounds inmates suffering leaving them without proper care OR relief.

### Call for Supreme Court Intervention

Given the gravity of the situation, it is imperative that the Supreme Court intervenes to address these glaring issues within our prison system. Emergency bail or bond for extraordinary reasons must be considered to alleviate the suffering of inmates and provide them with an opportunity to receive the care and support they desperately need. By granting emergency bail or bond, individuals like myself who have families in need and pressing health concerns, can be released to provide the necessary help and

support. The current state of the prison system fail to adequately care for its inmates and urgent action is required to rectify this injustice. The crisis within our prison system demands immediate attention. The shortage of staff, overcrowded prisons, lack of training and resources, inadequate hygiene and healthcare, limited communication and support, unpaid labor and unmet healthcare need all contribute to a dangerous and inhumane environment. Being incarcerated is a daunting experience for anyone, but when faced with restriction on religious practices, lack of access to necessary medication, and a family crisis, it becomes even more challenging. In this article, I will delve into difficulties I am currently facing in prison due to my belief in Jesus my inability to take medication, and the obstacles preventing me from supporting my

family during their time of need.

## Imprisoned and My Belief in Jesus

As a firm believer in Jesus my faith has been a source of strength and solace throughout my life. However being in prison has severely limited my ability to practice my religious beliefs. Due to shortage of staff, religious Sunday services have been suspended for over six months, depriving me and many other of the spiritual guidance we desperately need. This deprivation has cause immense frustration and distress among the incarcerated population.

## Denied Access to Medication and Alternative

Another significant Challenge I face is the prison's refusal to allow me to take medication based

ON my religious beliefs, while I understand the need for certain medical treatment, I firmly believe that my faith should guide my health decisions. Unfortunately, the prison administration has not been accommodating in this regard, leaving me without the necessary support for my physical well-being. To address this issue, I have sought alternatives such as herbal remedies. However, the prison's refusal to provide me with herb further exacerbates the situation. The denial of these alternatives not only infringes upon my religious freedom but also compromises my overall health.

### Family Crisis

Amidst these personal challenges my family is currently facing a crisis. My minor son recently had an accident and crashed our car without a license. This unfortunate incident has not only caused emotional distress

but also financial strain. To worsen matter the insurance company has taken advantage of our situation and is refusing to pay for the damages to our car. According to South Carolina Rule 411 the insurance company should provide coverage for the damages caused by my son's accident. However their refusal to comply with this rule has far-reaching consequences not just for my family but also for our livelihoods. The financial burden of repairing the car has caused everyone in my family to lose their job, leading to further distress and uncertainty. Navigating

In the face of adversity, my family finds ourselves at the intersection of legal troubles and health cases. The deportation stage my wife in, coupled with two kids which is very hard to find a job and place to stay.

My mother inability to recover from Covid 19 and the breathing treatment that is required for life, she also have two of my kids, which just leave here without any help. This problem has left us in a dire situation.

Urgent assistance is needed to alleviate the legal and financial burdens that we currently face. It's my hope that by shedding light here with me and my family the court would understand that this problem still at hand 3 year's later. Nothing has change for me and my family as of today

### Navigating Legal Issues and stress

In an attempt to rectify the situation I have taken on the responsibility of contacting the insurance company on behalf of my family. However, due to the restriction imposed by the S.C.D.C. I am facing numerous obstacles. Constant phone call and mailing

problem have made it incredibly challenging to advocate for my right and guide them through this difficult period. The stress caused by these circumstances is over-whelming. As a prisoner, my ability to provide support and my ability to provide support and resources for my family is severely limited by S.C.D.C restriction, Despite desire to help. I find my-self unable to alleviate their hardships effectively.

### Emergency Bail or Bond for Extraordinary Reason

Given the extraordinary circumstances I'm facing, I firmly believe that emergency bail or bond should be considered. This would allow to temporarily leave prison and address the pressing issues surrounding my family crisis. While I understand the need for confinement the combination of religious, limitation denial of medication alternatives, and my familys urgent situation call for

a compassionate response from the  
Judicial System.

### Conclusion

In conclusion, my time in prison has been marked by numerous challenges stemming from restriction on religious practices denial of medication alternatives and family crisis. The lack of Sunday Services inability to pursue my religious practices and belief freely and the consequent stress have taken a toll on my mental well being. Additionally, the Insurance Company's refusal to fulfill its obligations has caused significant financial straining on my family leading to job losses and uncertainty. Despite these obstacles, I'm determined to the legal complexities and advocate for my families right. I believe that an emergency bail or bond should be considered to address these extraordinary circumstances and

much need support during this difficult  
in the light of CARE ACT and  
Roe v. Wade because my privacy  
and family concern.

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Case # 2021-001271

Certificate of Service

I Jamie Goss 294985 Petition hereby states under penalty of perjury that all statements stated herein today are true and correct. Appellant further states that he has served copie of Emergency bond on Attorney General, Court of Appeal and Supreme Court on Nov 1, 2023.

Jamie Goss  
P.O. Box 2039  
Ridgland S.C. 29936

Jamie Goss  
A-C-I / BA-2  
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Ridgeland SC 29936

Supreme Court  
1231 Gervais St.  
Columbia SC 29201

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SC Court of Appeals

Dear Clerk Appeal Court

Please file and Docket this motion  
for Emergency Bond.

Jamie Goss

Nov. 1, 2023

Jamie Goss 294885  
P.C.I. BA 2  
P.O. Box 2039  
Ridgeland SC 29936

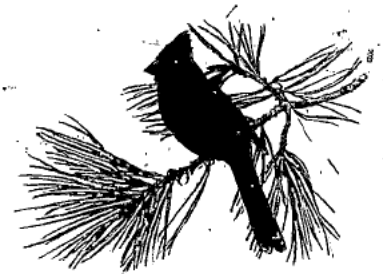
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