





SOUTH CAROLINA COURT OF APPEALS

KENNETH LEE BROWN, PRO SE, )  
APPLICANT, ) 1983-GS-42-06/1983-GS-42-10  
 ) 1983-GS-42-19/1983-GS-42-20  
V. ) 1983-GS-42-21/1983-GS-42-30  
 ) 1983-GS042-31  
STATE OF SOUTH CAROLINA )

This is a Writ of Error to The Court  
Applicant Brown is seeking to be Resentenced in light of  
Miller V. Alabama, 567 U.S. 460, 132 S.Ct. 2455, 183 L.Ed.2d 407(2012)  
which made retroactive a rule of Constitutional Law announced in  
Graham V. Florida, 560 U.S. 48, 130 S.Ct. 2011, 176 L.Ed.2d 825(2010)  
holding sentences are Unconstitutional for crimes excluding  
(homicide).


The Eighth Amendment forbids the sentence of Life with or without  
parole for (Juvenile offenders) Convicted of "Nonhomicide" offense

The Plain language of the Constitution is "nonhomicie"  
Applicant Brown is entitled to relief from his Unconstitutional  
sentence.

Applicant Brown didn't committe a "homicide offense that  
reflected their Permanent Incurrigibility; and that these rules  
relating to Juvenile sentencing are to be applied retroactive,  
meaning that sentences that were imposed in Violation of the  
Court's new rules See Roper V. Simmons, 543 U.S. 551, 125 S.Ct. 1183  
161 L.Ed.2d 1(2005); Graham V. Florida, 560 U.S. 48, 130 S.Ct. 2011  
176 L.Ed.2d 825(2010); Miller V. Alabama, 567 U.S. 460,  
132 S.Ct. 2455, 183 L.Ed.2d 407(2012); Montgomery V. Louisiana,  
136 S.Ct. 718, 193 L.Ed.2d 599(2016)

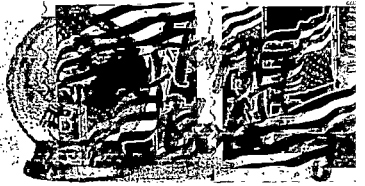
Applicant Brown received five life sentences. And the  
Constitution Prohibits the imposition of a life with or without  
Parole sentence on a Juvenile offender who did not committe  
("Homicide"). Applicant Brown is entitle to be resentence without  
the five life sentences.

This 21<sup>st</sup>, Day of December 2023.

S/   
Kenneth Lee Brown #56822-004  
FCC, Coleman, USP#1  
P.O. Box 1033  
Coleman, FL 33521-1033

Kenneth Lee Brown #56822-004/B-unit  
Federal Correctional Complex, Coleman us#1  
P.O. Box 1033  
Coleman, Florida 33521-1033

TAMPA FL 335  
SAINT PETERSBURG FL  
22 DEC 2023 PM 7 L



**RECEIVED**

DEC 27 2023

SC Court of Appeals

South Carolina Court of Appeals  
Clerk of Court  
P.O. Box 11629

2024-162925 Columbia, SC 29204