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FEB 26 2024

S.C. SUPREME COURT

Dear Ms. McMahon,

I am writing you to inform you that I have some important information concerning prosecutorial misconduct that I have discovered in my case and it's very vital that you come to see me as soon as possible. The information that I have puts the solicitors in my case in a lot of trouble and it's possible that we won't have to go to court and I won't need to put what I have discovered on record. It's very important that you come to see me because I am not going to risk being recorded on the phones that I usually speak with you on. I am asking for your help and representation pursuant to these rules, DEFENSE FUNCTION GENERAL STANDARDS, STANDARD 4-3.2 Interviewing the Client and STANDARD 4-3.6 Prompt Action to Protect the Accused. Please come and see me as soon as possible as it is very important and urgent. Also, please find enclosed that I have found multiple issues that I want you to amend my PCR application with and they are great issues that I know I can win:

- 1) Trial counsel was ineffective for failing to inform Applicant of his 5th Amendment Rights and the consequences of exercise and waiver of those rights, depriving Applicant of his 6th Amendment Right to Counsel and his 14th Amendment Right to Due Process.
- 2) Trial counsel was ineffective for failing to sequester the victim to be removed from the courtroom before the Jackson v. Benno hearing.

- 3.) Applicant's 5th Amendment Right to a Fair Trial and his 14th Amendment Right to Due Process was violated when the trial court instructed both counsel's to withhold the victim's identification of Applicant at the Jackson v. Denno hearing from the jury.
- 4.) Applicant's 5th and 14th Amendment Rights were violated when the State failed to correct false testimony at Applicant's trial when the victim testified.
- 5.) Trial counsel was ineffective for failing to vigorously cross-examine the state's witness at the Schmebber Hearing to expose his false testimony.
- 6.) Trial counsel was ineffective for failing to cross-examine the victim effectively on key points.
- 7.) Trial counsel was ineffective for failing to request the photo-lineup of Applicant to be included in Applicant's discovery.
- 8.) Applicant's 5th and 14th Amendment Rights were violated when the State failed to disclose to Applicant the photo-lineup and the victim's inability to identify Applicant in the photo-lineup, which was exculpatory evidence.
- 9.) Trial counsel was ineffective for failing to call a Touch-DNA Expert at trial to explain the complicated concepts of Touch-DNA.
- 10.) Trial counsel was ineffective for failing to object to the solicitor's improper comments during closing arguments.
- 11.) Trial counsel was ineffective for failing to admit the victim's identification of a light-skinned male at the crime scene into evidence.

12.) Appellate Counsel was ineffective for failing to file a writ of certiorari in violation of my due process right to challenge my conviction.

13.) Appellate Counsel was ineffective for failing to raise the Chain of Custody that was objected to at trial in violation of my Due Process right to challenge my conviction.

14.) Trial court erred by failing to grant Applicant a directed verdict.

If there is anything that I need to add in addition to the other issues I need you to amend I will send them also, I am preparing my Memorandum of Law and I will submit it to you once it is complete, thank you for your time and assistance.

Best Regards,

Nathaniel Hunter

February 22, 2023

Date

Nathaniel Hunter

Signature

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FEB 23 2023

TYRCI MAILROOM

# M<sup>C</sup>MAHAN LAW, LLC

April 12, 2023

Nathaniel Antron Hunter, #372378  
2B-0126-B  
Tyger River Correctional Institution  
200 Prison Road  
Enoree, SC 29335

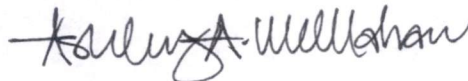
Re: Nathaniel Antron Hunter, #372378 vs. State of South Carolina  
2019-CP-32-04672

Dear Mr. Hunter:

I am in receipt of your letter dated April 4, 2023. I am assuming you wrote this to me after you got back from court. Remember, your case is still open so we can get the testimony of the solicitor. That testimony has not been scheduled yet – when it is I will let you know. Once all the testimony is taken, the judge will say who she wants an order from, me or the state. **I am not going to make the judge angry by also preparing and order and sending it, if she doesn't ask me to write one.** I will however, review anything the state sends to her (if she asks them) and make any necessary corrections to their draft order as I see fit. Since your case is still open, there is no need for any type of order to be submitted until all the testimony is taken in your case.

In the meantime, should you have any other questions I can be reached at the address listed below. Please note I do not accept collect calls or calls from items that are considered contraband. I also will not accept third party calls.

Best regards,



ASHLEY A. MCMAHAN  
ATTORNEY AT LAW

AAM

# M<sup>C</sup>MAHAN LAW, LLC

May 22, 2023

Nathaniel Antron Hunter, #372378  
2B-0126-B  
Tyger River Correctional Institution  
200 Prison Road  
Enoree, SC 29335

Re: Nathaniel Antron Hunter, #372378 vs. State of South Carolina  
2019-CP-32-04672

Dear Mr. Hunter:

Thank you for your patience. My apologies on my last letter. I had your case and another client's case from the April term confused. Your case is not still open awaiting the solicitor.

I have had to track down the memo you submitted that day in court. It should have been entered as a court's exhibit. Exhibits generally do not get clocked in but are kept by the clerk's office separately. When I called the clerk of court for a copy, they did not have it. I had to reach out to Judge Curtis's office to see if she still had it with her since she took your case under advisement. Her law clerk did confirm that they had it. I asked that they send it to the clerk of court for either filing or to be entered as an exhibit. Her law clerk indicated that they would do this soon. Once I have an update on that I will let you know. (I have a copy of it and the AG also confirmed they have a copy of it.)

In the meantime, should you have any other questions I can be reached at the address listed below. Please note I do not accept collect calls or calls from items that are considered contraband. I also will not accept third party calls.

Best regards,



ASHLEY A. MCMAHAN  
ATTORNEY AT LAW

AAM

# M<sup>C</sup>MAHAN LAW, LLC

July 19, 2023

Nathaniel Antron Hunter, #372378  
4A-0112-B  
Tyger River Correctional Institution  
200 Prison Road  
Enoree, SC 29335

Re: Nathaniel Antron Hunter, #372378 vs. State of South Carolina  
2019-CP-32-04672

Dear Mr. Hunter:

Thank you for your patience. I am writing you in regards to your letter dated June 14, 2023. Since your hearing is done and the record is closed, your memo is unable to be amended at the time. Yet if after receiving an order from Judge Curtis, it is found necessary Ms. McMahan will file a SCRP 59(e) motion to amend your memo, but only if the order needs to address an issue that was raised at you PCR hearing and not ruled on.

In reference to your letter sent to the Supreme Court, your memo was made an exhibit to your PCR matter. The judge has a copy, we have a copy, the AG office has a copy, and the clerk of court has a copy. Exhibits are considered part of the record. They are not clocked in (like a pleading), but kept in the clerk's office. Ms. McMahan did not want it clocked in because Ms. McMahan did not write it, so if it was clocked in like a pleading, it would've been ignored since you have an attorney and pro se fillings are not allowed. Making it an exhibit makes it part of the record.

Should you have any questions we can be reached at the address listed below. Please also note, we do not accept third party calls (violates attorney-client privilege), collect calls (they are recorded), calls from calling cards (recorded), or calls from items that are considered contraband. Please write me with any questions.

Best Regards,



Mya Mays  
Law Clerk for  
ASHLEY A. MCMAHAN  
ATTORNEY AT LAW

AAM/amm