

THE SUPREME COURT OF SOUTH CAROLINA
CLERK OF COURT

Dated MARCH 21, 2024

Patricia A. Howard

Post Office Box 11330

Columbia SC 29211

RECEIVED

MAR 27 2024

S.C. SUPREME COURT

Re: Jerome; Curry [Fresh And Blood Man] V. STATE OF
SOUTH CAROLINA

Appellate Case No: 2023-001641

Dear Patricia A. Howard;

Enclosed is Petition For Certiorari writ thereof in regards to (PCR) Post-Conviction-Relief Judgment and hearings on March 13 2024 before THE HONORABLE JUDGE WALTON McLEOD. I move before court requesting Certiorari with PR Bail Bond until Judgment is entered due to threats hits upon my life by (SCOC) Staff (Bloods And Crips) officials employed at (SCOC) my address has changed see below new address. Please be advise bail Appeal has already been put in and filed in the Mandamus Case No: 2023-001641 I move Court to grant that PR Bail bond pursuant to this writ of Certiorari being filed. I further request that a stamped filed and clocked copy be sent back to me for my records showing proof of service due to mail fraud within the Department of SCBC and Attorney General Dannel D. Dixon perjury statements at PCR hearings on March 13, 2024 stating to PCR Judge that she [REDACTED] was never served nor notified by this office that mandamus was filed and that you did not tell her to file response even though SCRACT Rule 240(e) states this I have yet received stamped filed and copies of last petition sent to you over 2 weeks ago about default and life in danger. Please send. Thank you for your time and fruitful assistance and may you have a blessed and peaceful day.

Very

Truly
(S) Jerome; Curry [Fresh And Blood Man] #252067
Jerome; Curry [Fresh And Blood Man]
PCR / GPH B-Side Cell #120
4434 Broad River Rd
Columbia SC 29210

STATE OF SOUTH CAROLINA

County of Charleston

Jerome: Curry [Fletcher/Blondman]

VS

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT OF SOUTH CAROLINA

Petition For Mandamus as pursuant to
SCRCP Rule 65(f)(1)

CASE _____

PCR 2022-CP-10-2017

PCR 2020-CP-10-05357

Questions For Review on writ of Certiorari

- (1) Did the Chief Judge Abuse his discretion and not vacating known void Judgment?
- (2) Did PCR Judge & Chief Judge abuse their discretion by ordering mental evaluation in (SCDC) when and while lawsuit for civil rights, inhumane treatment, living conditions, with assaults by gangs Blacks And Crips Staff blacks and Crips connected was Judge not in error in committing Petitioner still under those circumstances was that not an error of law conflict of interest?
- (3) Was not the Attorney General Danielle Dixon in default with the SC Supreme Court Mandamus case No# 2023-001641, and both PCR cases # 2022-CP-10-2017, and 2020-CP-10-05357 over 25 times on issues allegations raised herein?
- (4) By the Attorney General being in default with the SC Supreme Court on Mandamus ~~did that not moot the PCR hearing as a result of default?~~
- (5) Does the SC Supreme Court once motions and petitions are filed within their court is that Supreme Court right to advise the Attorney General to file an answer under SCRACP Rule 240(e)
- (6) Did not the petitioner entitled to due process fair hearing within PCR proceedings? further with rights under the constitution for self representation not forced Counsel whom Attorney General hand picked herself to conspire again to deprive petitioner of due process civil rights?
- (7) Was Judgment by PCR Judge Based upon findings of fact and 59(e) Conclusion of law and not conflict of interest Attorney General in lawsuit?

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APPENDIX 3 Mandamus United States Supreme Court denied jurisdiction

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APPENDIX 5

1.
Questions FOR REVIEW

Reason FOR Granting Review

1. Did The PCR Judge error and abuse his discretion by ordering evaluation on Petitioner stating that Petitioner was incompetent upon zero evaluation Results?
2. Did The PCR Judgment in violation of Equal protection of the Laws Federal/ State as well as Due Process?
3. Was PCR Judge Judgment bias and based upon Error of Law?
4. Did the Attorney General PCR Counsel & Guardian ad litem conspire to deprive the Petitioner of his civil Rights & Constitutional Rights committing fraud misrepresentation upon the Court?
5. Was the Attorney General in default with the SC Supreme Court at time of PCR hearing rendering PCR Hearing moot?
6. Was it not a conflict of interest for Attorney General to still be over case when Attorney General is in civil lawsuit for conspiring to deprive Petitioner of fair trial committing conspiracy against the petitioner?
7. Was it not conflict of interest for Judge PCR Judge to enter Judgment committing the petitioner to mental Hospital in (SCDC) where they failed since Oct 30, 2021 to provide such treatment mental Health treatment instead providing inhumane treatment and living conditions?
8. Does not the Petitioner entitled to fair PCR Proceedings with right under the Constitution to Represent himself and not forced counsel upon him that Attorney General hand picked herself?
9. Was Judgment by PCR Judge Based upon Findings of fact and Conclusion of Law?

JURISDICTION

3

- (1) Petition should be granted due to denial of justice violation of civil rights fair proceedings within PCR.
- (2) Judge abuse his discretion was bias and prejudice was not allowed to speak long at all Attorney General even in default over 20 times still allowed to speak present evidence shown evidence on day of hearing in violation of SCRCP Rule 8(b)(d), SCRCP Rule 7(a), due process procedural due process, Judge error in law abuse his discretion and court has jurisdiction based upon the constitution and due process.
- (3.) Court has jurisdiction under the constitution to hear case and vacate known void judgment, Court has original jurisdiction to hear this case SC Art V section 5

REASON WRIT SHOULD BE GRANTED

1. Judge abuse his discretion!
2. Error of Law?
3. Denial of Justice & Due Process
4. Conflict of Interest?
5. Bias treatment Due Process Violation?
6. Denial of equal protection of the laws?
7. Malicious Prosecution
8. Abuse of Power
9. Abuse of use of governmental use of office
10. Fraud upon Court done in bad faith
11. Misrepresentation due to Fraud / misrepresentation
- 12 Judgment being Void & unconstitutional

JURISDICTION

[] For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was N/A.

[] No petition for rehearing was timely filed in my case.

[] A timely petition for rehearing was denied by the United States Court of Appeals on the following date: N/A, and a copy of the order denying rehearing appears at Appendix .

[] An extension of time to file the petition for a writ of certiorari was granted to and including N/A (date) on A (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1) And S. C Const V Section 5

[] For cases from **state courts**:

The date on which the highest state court decided my case was still pending still supreme court.
A copy of that decision appears at Appendix A still pending

[] A timely petition for rehearing was thereafter denied on the following date: still pending, and a copy of the order denying rehearing appears at Appendix N/A.

[] An extension of time to file the petition for a writ of certiorari was granted to and including N/A (date) on A (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

4 TABLE OF AUTHORITIES CITED

Page Number

CASES Competency Cases,

Preliminary Hearing Cases, &

Suggestive Identification Cases

State v. White 243 SC 238, State v. Adcock 9522 73 (1940), Williams v. State 356 F2d 432,
State v. Crosby 108 SC 315, State v. Sanders 281 SE2d 431, State v. Zaby, US v. Smith
22 Fed Appx 137, Gustein v. Pugh, McLaughlin 500 US at 57, Roberts v. La Valle
389 US 40 (1967), Britt v. N.C. U.S. [REDACTED] 404 US 226, Pate v. Robinson 383 US 375,
Drope v. Mo., 420 US 162, Taben v. US 381 US 214 Preliminary, hearing delay and objections,
Sanders v. State 246 F. Supp 563, State v. Flood 184 SE2d 549, State v. Jones 173 SE2d 77,
Riverside v. McLaughlin 500 US 44, State v. Ballington 551 SE2d 280 (2001)

STATUTES AND RULES

SC Code of Laws Section 16-5-10 Perjury.

SC Code of Laws 1976 Section 22-5-320 Defendant's demand for preliminary investigation

South Carolina Rules of Criminal Procedure Rule 2 (a)(b)(c) Preliminary hearing, SCRCP Rule
240 (e), SC Const. ART V Section 5, SC Code of Laws Statute 14-3-310

USC Judgments: Ware v. Ware, Thomas & Howard Co. Inc v. T.W. Graham and Co.
457 SE2d 340 (1995), McDaniel v. Fidelity and Guar Co. 478 SE2d 868 (1996)

SCRCP Rule 60 (b)(4), 11 Wright, Miller and Kane Federal Practice and procedure civil section
2862 at 60:25 (4) (2nd Ed 1996), Gattling v. Beach Palace Inc 294 SC 464,

American Jurisprudence Second Edition Feb 2023 Update Section 13 Due Process
of Law Requirement for valid judgment.

FRANKS Hearings Cases: Frank v. Delaware 285 SC 2674 (1978) State v. Robinson,
State v. Lynch, State v. Paris, State v. Herrell, State v. Robinson 408 SC 268

SC Code of Laws section 16-9-10, USCA Section 1985 Conspiracy to interfere with civ. rights (3)

OTHER

Constitution law of the land Smith v. O'Grady 312 US 329, American Jurisprudence
Second Edition August update section 632 suggestive show-up, State v. Pichardo 367 SC 84,
State v. Denno 388 US 293, Neil v. Biggers 409 US 188, Manson v. Brathwaite 97 SE2d 2243,

Simmons v. United States 88 SCt 967
to respond to motions section 28, American Jurisprudence Second Edition Nov 2022 update Failure

American Jurisprudence Second Edition Nov 2022 update section 169 Answer or return for state post
conviction relief; Petition for relief from judgments, SCRCP Rule 8 (b)(5) Rule 7(c),

Thompson v. Queen City Coach Co. 169 SC 231 1933, Bailey v. State 709 SE2d 671

South Carolina Jurisprudence May update 2022 Rules of Civil Procedure Section 12.2
IV pleadings and motions, American Jurisprudence Second Edition section 752 Effect on
Failure to object deemed admissions

American Jurisprudence Second Edition Findings of fact and conclusion of law Oct 2023 update section
251, Section 1589, section 100 and section 70.

BRADY v. Maryland, State v. Bagley 473 US 667, State v. Moses 702 SE2d 395

IN THE
SUPREME COURT [REDACTED]
PETITION FOR WRIT OF MANDAMUS

Petitioner respectfully prays that a writ of mandamus issue.

OPINIONS BELOW

☐ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix _____ to the petition and is

- ☐ reported at N/A; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the United States district court appears at Appendix _____ to the petition and is

- ☐ reported at N/A; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

☐ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix A to the petition and is

- ☐ reported at Still Pending non-response state in default; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the still pending non-response state in default court appears at Appendix N/A to the petition and is

- ☐ reported at N/A Still pending SC Supreme court; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

- (1) Fifth Amendment TO The United States Constitution
- (2) 14th Amendment TO The United States Constitution
- (3) S.C. Const. Art. I § 11 Presentment OR Indictment
- (4) S.C. Code Ann §§ 17-19-10 Presentment OF Indictment
- (5) S.C. Code Ann §§ 17-23-130 Waiver OF Indictment
- (6) S.C. Code Ann §§ 17-23-146 Waiver OF Indictment
- (7) 6th Amendment TO The United States Constitution Effective Assistance OF Counsel
- (8) Equal Protection OF The Laws
- (9) American Jurisprudence, Second Edition November 2022 Update; Clerks OF Court § 65 Mandamus TO Compel Performance OF Duty BY Clerk OF COURT.
- (10) American Jurisprudence Second, Edition November 2022 Update § 238 United States AS TO Default Judgment.
- (11) South Carolina Jurisprudence November 2022 Update § 55.0 Rule 55 default
- (12) American Jurisprudence Second Edition November 2022 Update § 370 Time TO Answer IN Action FOR Mandamus.
- (13) American Jurisprudence Second Edition November 2022 Mandamus § 256 Mandamus Compelling assumption AND Exercise OF Court OR Judicial officer.
- (14) South Carolina Rules OF Professional Conduct Rule 3.8 Special Responsibilities OF A Prosecutor
- (15) Malicious Prosecution: TO Sustain an action for malicious prosecution it must be shown that probable cause was lacking for the institution OF the proceedings complained OF
- (16) American Jurisprudence Second Edition May 2022 (C) Waiver OF Indictment; Indictment & Information § 16 Effectuation Waiver
- (17) American Jurisprudence Second Edition May 2022 Indictment & Information, § 7 Effect OF Lack Indictment.
- (18) S.C.R.C.P R 12(a) Time TO file Answer TO PCR, S.C.R.C.P R 55(a), S.C.R.C.P R 60 (b)(4)
- (19) S.C.R.C.P R 8 (b) (d), S.C.R.C.P R 7(a).

RECEIVED

Mar 27 2024

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

Jerome's Coney [Flesh and Blood Man]

IN THE SUPREME COURT OF SOUTH CAROLINA

PCR Case No: 2022-CP-10-2017,

PCR Case No: 2020-CP-10-05357

PETITION FOR WRIT OF CERTIORARI
FOR REVIEW OF PCR JUDGE THE HONORABLE
WALTON McLEOD DATED: MARCH 13, 2024

IN THE NINTH JUDICIAL CIRCUIT

CASE NO: _____

STATE OF SOUTH CAROLINA

PETITION FOR WRIT OF CERTIORARI

Comes nows Petitioner in the above entitled case moving before this Honorable Court for review of PCR Judge judgment entered on or about March 13, 2024 before the Honorable PCR Judge Walton McLeod in the Ninth Judicial Circuit. On March 13, 2024 Petitioner was set for PCR Post-Conviction-Relief Hearing for two Pro Se Cases 2022-CP-10-2017 and PCR Case 2020-CP-10-05357 forced Counsel appointed by the Attorney General Danelle Dixon whom has been willing to conspire with whomever was willing to conspire with her to deprive the Petitioner of his civil Rights.

Due process rights to a fair Hearing, Judicial proceedings in regards to (PCR) Post-Conviction-Relief proceedings in which this same Attorney General Danelle Dixon conspired with last PCR Counsel Appointed by this Attorney General Danelle Dixon whom she appointed then Christopher Murphy whom then set forth within Federal District Court Civil lawsuit 1983 Civil Rights lawsuits under the (Civil Rights Act) Case number 0:23-CV-03255-JDA. That Attorney Christopher Murphy was removed for conspiring with the Attorney General Danelle Dixon and PCR Judge at that time to make allegations of Petitioner being mentally incompetent based upon a 2020 mental evaluation report from 2020 stating that the Petitioner was mentally incompetent and still is mentally incompetent as of right now. If true that would be a due process violation in the Petitioner PCR Case # 2022-CP-10-2017 rendering Judgment void therefore.

STATEMENT OF FACTS

Petitioner never received a State v. Blair Hearing as required and mandatory under State v. Blair and as in accordance with SC Code of Laws for 1976 Section 44-23-430, and 44-23-410, knowing these stated facts PCR Judge still allowed the Attorney General Danielle Dixon along with Court appointed Counsel Denise Swope and Guardian ad Litem Blake G. Abbott appointed on Nov 8, 2023 see exhibit #1 never once spoken to nor ever advised by this guardian ad litem that he was representing me met him and PCR Court appointed Counsel Denise Swope on day of PCR hearing of March 13, 2024 at 9:30am prior to seeing PCR Judge in which I state and declare under penalty of perjury that this is true and correct I certify and declare that I never once met or spoken to either of these court appointed Counsel until day of PCR hearing no more than 5 mins to 7 mins tops so help me God other than phone call to Lee Correctional Institution by Court appointed Counsel Denise Swope whom I advised of civil lawsuit and mandamus filed against Attorney General Danielle Dixon.

And that PCR Hearing was moot based upon filings of mandamus in South Carolina Supreme Court Patricia A. Howard filed Oct 20, 2023 response due on Oct 30, 2023 as pursuant to South Carolina Rules of Appellate Court Procedures Rule 240(c)(10) daytime limit in which the Clerk of Court Patricia A. Howard e-mailed Attorney General Danielle Dixon about notifying of this mandamus filed by me prose further in which I mailed copies of all filings in connection with this mandamus.

As a result of the Attorney General failure to file a response on Oct 30, 2023 I put in prose motion notice for entry of default Judgment with Affidavit in support thereof. Mandamus was filed pursuant to SCRC P Rule 65(f)(1) Default Judgment was filed on Nov 27, 2023 in which e-mailed copy as well as me myself sent copies of all filings in connection with mandamus case Number # 2023-001641 amendments was sent to AG by mail.

STATEMENT OF FACTS

On March 13, 2024 at PCR hearing AG stated to PCR under oath this Attorney General Danielle committed fraud and perjury by stating to PCR Judge that she was never notified of any Mandamus being filed no other than mandamus Filed in the United States Supreme Court in which she failed to respond to that mandamus also within (30) days as required see: exhibit #2. This mandamus was denied due to lack of jurisdiction. The AG was in default in that case also case number 52-18, 2023-52-18 United States Supreme Court and mandamus case number 2023-62-12 United States Supreme Court see Exhibit #3 the AG was in default in both of these cases denied based upon a lack of jurisdiction.

Furthermore as stated before the Attorney General stated to the PCR Judge The Honorable Walton McLeod that she was never served any mandamus filed with the South Carolina Supreme Court then later stating she was served but was never advised by the South Carolina Supreme Court to file any response. The Supreme Court of South Carolina is not required to tell the AG Attorney General that she is required to serve any response South Carolina Appellate Court Rules advises the Attorney General of this fact in further pursuant to South Carolina Rules of Appellate Court Rule 240 (e) (10) days time period allowed to respond to motions and petitions.

A lack of understanding of the law is no excuse for failing to respond to a responsive pleading that applies to the Petitioner as well as to the Attorney General Danielle who has defaulted totaling over 25 times in motions, petitions, and pro,se filings within PCR action connected to PCR cases of # 2022-CP-16-2017, and PCR case 2020-CP-10-05357 within the lower courts the Ninth Judicial Circuit Court PCR case # 2022-CP-16-2017 motion such as Relief From void judgments in June of 2023, motion to vacate void judgment, June of 2023, default judgments in July, June, Aug, and now the first three in 2023 and last default filed Nov 8, 2023, Summary judgment filed Nov 8, 2023, Relief From void Judgment filed Nov 8, 2023, motions pro,se proposed order filed sent certified mail dated April 24, 2023, April 10, 2023 and pro,se proposed order filed Feb 15, 2024, Feb 8, 2024, in ninth circuit

STATEMENT OF FACTS

Court under PCR Case # 2022-CP-10-2017 and South Carolina Supreme Court case # 2023-001641 in which the Attorney General was in default on prior to the setting of PCR hearing of March 13, 2024 in which I sent PCR Judge Walton McLeod copies of along with sending copies of all these motions prose proposed orders Nov. 8, 2023 or before then further sending copies to Julie J. Armstrong and Chief Administrative Judge Jennifer B. McCoy for review before this PCR hearing.

STATEMENT OF FACTS

I was not able to mail copies to court appointed counsel Denise Swape or Blake Abbott Guardian ad litem due to the fact I never received any letter from them furthermore motion to strike the appointment of Guardian ad litem Blake Abbott was filed and served upon the Attorney General Danielle Dixon filed with South Carolina Supreme Court Nov 27, 2023 by the Honorable Patricia A. Howard and served upon Attorney General Danielle Dixon as well as e-mailed to the Attorney General Danielle Dixon By Patricia A. Howard clerk of Court herself whom I spoke to on recorded phone call from Lee Corr. Inst about along with also speaking to the (AG) Attorney General Danielle Dixon about on recorded line phone call about this and her being in default.

STATEMENT OF FACTS

Furthermore a week before PCR hearing I spoke with Court appointed counsel Denise Swape whom set up phone call to Lee Correctional Inst. in which I spoke to for the first time on or about Feb 23, 2024 in which I advised her I wanted my mental health specialist and doctor Samuel Rosen from St. Francis hospital subpoena at PCR hearing along with (S.D.C) Staff from F-7 [REDACTED] Rhu unit with video cam Subpoena of all my movements and cells since 5/23/23 to 3/12/24 and to view all filed prose documents filed by Petitioner.

STATEMENT OF FACTS

Petitioner states that he advised PCR Counsel at that time if she could not get with him before PCR hearing of March 13, 2024 about having judgment vacated due to conviction without grand jury indictment, conviction without valid waiver of indictment, conviction without timely preliminary hearing held without Petitioner present over 8 months past demand by the petitioner see PCR motions Filed in connection with (PCR) Post Conviction-Relief Case Number 2022-CP-10-2017, conviction without writ U. Biggers Hearing, conviction based upon invalid guilty plea entered not knowingly, and intentionally, nor voluntarily but entered without FULL DISCLOSURE OF EVIDENCE, without FULL DISCLOSURE OF Rights given up before entering guilty plea instead Petitioner plead guilty upon the record before being advised of guilty plea then afterwards given given and notice of rights waived by pleading guilty only after stating that he was guilty and not before,

STATEMENT OF FACTS

Conviction with Brady material documents presented 2 years and over two weeks after guilty plea, Including sham indictment never presented to petitioner until over 2 years and over two weeks after guilty plea provided by plea counsel on Oct of 2023 see Exhibit #3 letter from [redacted] plea counsel Ben Lewis send documents Rule 5 Brady motions documents that could have been used before and to have me found not guilty and not guilty by reason of being mentally ill at time of arrest and conviction plea counsel stated once that I would and could not use not guilty due to being incompetent, and that one-on-one show-up identification was only way to identify me as suspect from 20 years away while I was in back of Ems Truck being treated for mental illness later to find out that was not true conviction without Frank's Hearing on sham person's impeachment statement under oath in Arrest affidavit along with affidavit stating three different charges of Attempts not armed robbery, Further

6.
STATEMENT OF FACTS

stating elements of attempt strong-armed-robbery, attempted purse snatching, attempted petty larceny but not armed robbery or attempt robbery. Petitioner further advised PCR counsel of fact that victims nor witness never identified the [redacted] suspect from photo line-up instead pick two other suspects see exhibits 4, 5, 6, along with Sentencing sheet in Exhibit 7 with void sham indictment not true billed in which the Attorney General Danielle P. Dixon and Solicitor Fraud upon the courts stating Petitioner pled guilty based upon indictment void indictment never presented to petitioner nor for State grand jury further in violation of SC Code of Laws Statute 17-14-10, 17-23-130, 17-23-140; State v. Clair or Clair v. State, Phillips v. State, Grim v. State, State v. Clarkson, Odum v. State.

STATEMENT OF FACTS

stating in the Supreme Court cases State v. Clair, Odum is stated in which the Supreme Court stated that in order for a indictment waiver to be valid waiver must be in writing further stating that the Supreme Court has strictly construed that in order for indictment to be valid waiver is mandatory that such waiver be in writing only oral waiver of indictment is insufficient. All stated herein was made known to PCR Judge Walton McLeod and Chief Administrative Judge before PCR hearing by petitioner mailing all the documents in connection with these PCR cases 2022-CP-10-2017 and 2020-CP-10-05357 yet the Chief Administrative Judge and Chief Administrative Judge refuse to review such documents PCR counsel Denise Swartz was made aware of these stated facts in which Petitioner advise her of on phone one week before phone call and that if she could not meet with me before and make decision to move for case to be vacated I would have her removed off my PCR case 2020-CP-10-05357 this counsel never contacted me at all did not hear from this counsel until cant PCR hearing March 13, 2024 I move to have this counsel removed

STATEMENT OF FACTS

I was aware of the fact that preliminary hearing was requested on May 22, 2020 via E-mail by plea counsel Ben Lewis upon Applicant's request. The Applicant was told by plea counsel that a preliminary hearing was held yet nothing within the courts records shows no such hearing only request of hearing see exhibit #1 attached with this proposed order request for Preliminary hearing. Applicant requested copy of the preliminary hearing transcript from plea counsel as required by due process 14th Amendment to the US Constitution and was told by plea counsel that he was not entitled to such transcript or transcript of grand jury indictment which was wrongful and false advice made to Applicant by plea counsel in regards to this. Further done in bad faith without full disclosure of evidence prior to guilty plea presented evidence that support only request for preliminary hearing was made and not actual hearing itself after 2 years or over a month or so after being advised to plea guilty knowing these stated facts by plea counsel this fraud misrepresentation ineffective assistance of counsel, conspiracy to deprive civil rights to due process fair hearing in regards to guilty plea and without full disclosure rendering judgment, plea, conviction and sentence void. There can be Brady violation for the withholding of this document. Preliminary hearing held on or before 15th of Feb uncertain date but held pass 45 days violation charge should have been dismissed due to that

Applicant further states that on 12/18/23 he found out by reading e-mail Dated: Monday September 6, 2021 at 6:18 pm From: Susan Knight Board-Certified Forensic Psychologist that according to this e-mail in which is attached to this proposed order as exhibit #2 it states in part that Susan Knight stated to Ben Lewis "That" Essentially, the records describe Mr. Curry as very agitated and uncooperative, yelling over most attempts to ask questions, "They did not do a drug test. ER staff called her psychiatrist who is familiar with him, Dr. Rosen. But Dr. Rosen didn't actually see him. He recommended Mr. Curry be held overnight until a psychiatrist could evaluate him but the jail was pushing for discharge so, they sent him to jail after a few hours. Dr Rosen is documented as saying to the ER staff he agrees that armed robbery is not a symptom of any of patient's psychiatric diagnoses, but notes that patient is known to frequently be noncompliant with his prescribed psych meds and often becomes psychotic when off them. He recalls having seen patient under those circumstances in the past and states that he has typically presented similar to how he appears today

In his competency restoration records, Mr. Curry reports heavy use of spice, using last on 5/13/20 so it is also documented elsewhere. Bottomline, if I wrote it up, I would need to include the drug use as the primary causative agent. The State already has two competency reports detailing his mental illness, and he was found incompetent, so we don't have to convince them he's mentally ill. Thus based upon ER visit on 5/13/20 at St. Francis day of arrest. before being sent to the County Jail to be booked for the charges in which PCR has been filed for. The Applicant states under penalty of perjury and mandatory before the judge can accept guilty plea otherwise plea is invalid further on process

STATEMENT OF FACTS

that he advised plea counsel of fact that he was mental ill at time of arrest and that plea counsel Ben Lewis should move for not guilty due to being mentally ill. Counsel stated that he felt that Applicant was not mentally ill at time of offense accused for and that he felt that the Applicant could not prove that he was mentally ill despite the fact that he was and as in accordance with the ETC records at the time and date of arrest 5/13/20 and e-mail sent to Ben C. Lewis plea counsel dated: Monday September 6, 2021 at 6:18 pm as Exhibit # 2

Furthermore notes and e-mail dated: 6/01/2020 at 9:08 am states in part by Ben Lewis made aware to Applicant and presented on 12/18/23 2 years and over a month after guilty plea Brady violation done in bad faith without full disclosure within this report e-mail notes from Ben Lewis it states in part that Applicant (Aunt) Sheneene Frazer stated in last three months Jerome has been having a mental breakdown Aunt has been trying to get him some help. She went to MHT after he had his first episode in April (week of Easter) call from St. Francis that was brought in and gave him some medication and then released him the following day, went to MHT and got a probate and tried to get a petition to get him committed. With everything going on they weren't having court procedures. May 6th got another call that he had a mental breakdown and was admitted on the 6th. Dr diagnosed with severe bipolar with psychotic features he is mentally ill. Week that this happened he was kind of highly agitated. MHT has like a crisis line that they will assess people with and they were trying to get him picked up and put back in. Had an appointment with MHT and was agitated then and refused treatment and he left. After hadn't heard from him in a few days. When, when spoke with him the night of the 12th was a bit agitated. Saw that he made a withdrawal from the bank of \$250. Basically what she's saying is that he does have a mental illness and she's trying to help him. With MHT his state of mind right now and not being on his medication. He cannot help himself. The few days before he was being paranoid. MHT saying that people were listening to his phone calls and stuff like that,

Thus showing that the Applicant was in fact mentally ill at time of false arrest and unlawful arrest without probable cause further convicted without State v. Blair hearing SC Code of Laws Statute 44-23-410, 44-23-430 in which is an due process violation rendering judgment, conviction, plea, and sentence void therefore. Further as stated herein Applicant was further convicted without preliminary hearing or State grand jury indictment, or signed waiver of indictment as required by SC Code of Laws Statute 17-19-10, S.C. Const. Art I Section 11 thus mandatory that Applicant must be indicted prior to guilty plea unless signing waiving of indictment as stated within SC Code of Laws Statute 17-23-130, 17-23-140, State v. Clarkson oral waiver of indictment is insufficient in order for indictment to be valid waiver must be in writing only and that the South Carolina Supreme Court has strictly construed that indictment must be in writing only and mandatory before the judge can accept guilty plea otherwise plea is invalid further due process

STATEMENT OF FACTS

Violation and unconstitutional. According to the case of State v. Dingle 206 SE2d 223, South Carolina Dept of Motor Vehicles v. McClaron 205 SE2d 425, Summersell v. South Carolina Dept of Public Safety 513 SE2d 619 it states in part that all cases purpose of preliminary hearing is to apprise defendant of nature of State's evidence, its purpose is more specifically to establish that probable cause exists to continue criminal process. Thus a requirement of due process under the US Constitution 14th Amendment State/Federal

Conviction without this procedure or a preliminary hearing renders judgment void therefore lack of probable cause violation of 5th Amendment to the United States Constitution Probable cause. SC Rules of Professional Conduct Rule 3.8 Special Responsibilities of a Prosecutor states that: The prosecutor in a criminal case shall (a) refrain from prosecuting a charge that the prosecutor knows is not supported by probable cause. without indictment by state grand jury waiver of indictment or preliminary hearing there is no probable cause for arrest, conviction, plea further lack of subject matter jurisdiction. US v. Williams 112 S.Ct 6735 (1992) The Supreme Court of the United States stated that: A grand jury proceeding is an ex parte investigatory proceeding to determine whether there is probable cause to believe a violation of the criminal laws has occurred,

CONCLUSION OF LAW Findings OF FACT

Applicant hereby states that based upon all these statements stated herein he is entitled to have void judgment vacated without delay and as a matter of law and justice. A void judgment is a judgment entered without subject matter jurisdiction, personal jurisdiction, and without due process. Void judgment can be raised at anytime has no deadline is a nullity cannot be upheld, affirmed, or supported at all whatsoever.

Void judgment is if no judgment entered at all once presented before the courts it is an abuse of discretion for a judge to not vacate known void judgment further mandatory that judge must vacate known void judgment once presented before the courts upon motion for relief from void judgment SCRPC Rule 60 (b)(4), Sanders v. Smith, Ware v. Ware. Applicant request that this Honorable Court vacate known void judgment without delay void judgment cannot be corrected at all whatsoever and only can be vacated therefore in order to correct this void judgment, conviction, and plea it must be vacated without delay in same manner with requirement of due process to be heard within a reasonable amount of time.

Applicant's PCR was filed on 5/2/22 20 months and counting (9 months on counting awaiting judgment to be entered on motions in relations with PCR Application therefore in order for the Applicant not to be prejudice any longer and the event or further delay in judgment on the issues at hand Applicant would be forced to serve total sentence of 6 year 85% void judgment if not vacated now. Therefore as a result of this fact the Applicant moves before this Honorable Court requesting Court grant proposed

proposed order without delay on this _____ day of _____ AND IT IS SO ORDERED BY HONORABLE CHIEF ADMIN. JUDGE ROGER M. YOUNG SR. _____ AND ENTERED TODAY.

10
CONVICTION WITHOUT FRANK'S HEARING ON SHAM &
PERJURY STATEMENTS MADE UPON OATH IN
ARREST AFFIDAVIT FAILURE OF COUNSEL TO
REQUEST SUCH HEARING MOVING TO HAVE
ARREST AFFIDAVIT QUASHED & DISMISSED
DUE PROCESS VIOLATION & INEFFECTIVE
ASSISTANCE OF PLEA COUNSEL

Appellate states that he was convicted without Frank's Hearing upon request of Appellate to Plea Counsel due to sham perjury statements stated under oath without probable cause for arrest all done in bad faith in violation of clean-hands doctrine, further done in unclean-hands doctrine, in violation of the fair arms of the law, without FULL DISCLOSURE OF evidence in favor of State and Appellate withholding of documents that if the Appellate had presented to him prior to pleading guilty and view by Appellate before pleading guilty Appellate would have never under those circumstances ever plead guilty but only Plead guilty based upon fraud, misrepresentation, conspiracy to deprive civil, human, and constitutional rights of Appellate done in order to get conviction for violent offense knowing if Appellate was convicted of this most serious offense violent offense regardless if committed by Appellate or not if he were to be found guilty of another most serious offense violent offense then Plea Counsel, the Court, & Solicitor could justify conviction of life sentence imposed upon the Appellate in which Plea Counsel Ben Lewis, Ashley Pennington, Solicitor, Police Dept, city of Charleston SC, City Police Dept, Charleston SC Sheriff's Office & Charleston County Public Defender's Office all conspired to do to Appellate willingly in bad faith in violation of clean-hands doctrine, done in unclean-hands doctrine, without FULL DISCLOSURE Thus are Process violation State/Federal/Ineffective Assistance of Counsel rendering Judgment NOT ENTERED KNOWINGLY & INTELLIGENTLY ENTERED DUE PROCESS & INEFFECTIVE ASSISTANCE OF PLEA COUNSEL THEREFORE must be vacated without delay;

Appellate states that guilty plea was not entered into knowingly & intelligently done in bad faith without FULL DISCLOSURE OF guilty plea rights given up by pleading guilty without FULL DISCLOSURE OF Mental Health Evaluations results, notes, tests, statements by witnesses in Appellate's defense such as the Appellate's Aunt statements of Appellate's mental health leading up to date of arrest, medical records of being mentally ill and incompetent at time of guilty Plea and arrest and conviction with statements made by mental health experts and specialist along with Appellate's own mental health provider doctor Dr. Rosen stating and requesting that the Appellate be kept overnight at St. Francis Hospital in order for him to be correctly evaluated knowing Appellate was mentally ill at time of arrest and conviction further finding Appellate incompetent at time of arrest and conviction and plea as per 44-23-410, 44-23-430 further convicted without State v. Blair Hearing knowing that it was mandatory before Judge could accept guilty plea as in accordance with SC Code Ann. §§ 44-23-410, and 44-23-430 Appellate requested of counsel to seek not guilty/mentally ill counsel refused stating he felt that the Appellate was not mentally ill knowing as per notes and plea counsel e-mail from mental health specialist and expert stating along with Appellate's own Dr. Rosen that Appellate was mentally ill on date of arrest and before being transported to jail.

11

~~CONFIDENTIAL~~

CONVICTION WITHOUT INDICTMENT OR SIGNED WAIVER
OF INDICTMENT OR PROCESS VIOLATION

§
INEFFECTIVE ASSISTANCE OF COUNSEL HEREAFTER

12

Appellate was convicted for attempted armed robbery without state grand jury no true bill was presented to state grand jury at all whatsoever. As required and mandatory SC Code Ann §§ 17-19-10, S.C. Const Art 1 Section 11 or signed or written waiver thereof as in accordance with SC Code Ann §§ 17-23-134, 17-23-140, State v. Clair, State v. Phillips, State v. Smalls, State v. McNeill, Odom v. State, State v. Clarkson in which stated it is mandatory that before Judge could accept guilty plea waiver must be done in writing only and not orally further stating indictment is a notice document and requirement per 14th Amendment to Due Process State/Federal placing defendant on notice of charges against him or her. The South Carolina Supreme Court has strictly construed that in order for indictment to be valid it's mandatory that waiver must be in writing only oral waiver of indictment is insufficient a State v. Chiles State Supreme Courts judgments & rulings are binding upon the courts. Conviction without state grand jury indictment or valid waiver thereof renders judgment void & must be vacated. Further Due Process & Ineffective Conviction without State v. Blair Hearing & Conviction without Assistance of Plea

FULL DISCLOSURE OF EVIDENCE BRADY VIOLATION
DUE PROCESS VIOLATION / INEFFECTIVE ASSISTANCE
OF PLEA COUNSEL

Counsel Hill v. Lockhart,
Alexander v. State, Strickland v. Washington.

Appellate states that he was convicted without FULL DISCLOSURE OF Guilty Plea by pleading guilty before Court confessing guilt upon record before being advised of rights given up by pleading guilty upon the record in open court in transcript of guilty plea in all charges convicted off in connection with every and all cases filed and presented before this Court by way of Mandamus Filed on 12/12/23, 10/24/23, 10/30/23, 10/31/23, 11/27/23, 11/22/23, a Appellate states that 8 months after guilty plea and invalid oral waiver without FULL DISCLOSURE OF Guilty plea rights given up before entering guilty plea rights of waiver of indictment etc, Further done in bad faith unconscionable - hands - doctrine, fraud, misrepresentation, without FULL DISCLOSURE in violation of the Four corners of law done in order to trick and have Appellate plead guilty not knowing all sides of guilty plea rendering guilty plea void unintelligently entered into not knowingly entered due process violation Brady violation / due process / ineffective assistance of counsel knowing these stated facts and still conspiring together in bad faith to get Appellate to plea guilty knowing these stated facts. Appellate was further provided with 911 phone call recording and some mental health records not including evaluations results further violation of FULL DISCLOSURE in the receiving and providing of all mental health records in which was withheld and still withheld and present with only half of such records 2 years and a few weeks after guilty plea thus Due Process / Brady violation / Due Process / state / federal Ineffective assistance of counsel rendering judgment void therefore in which must be vacated cannot be fix, cured, saved, affirmed, only vacated as a matter of law, justice, due process and equal as per equal protection of the laws State / Federal therefore as a result

Statement OF Facts

page 12

John macy is money made by inmates and young female staff that inmates contact per cell phone get men names and numbers and get these men to send them pictures of their dicks. Prisoners do this using females that look underage young female staff pictures and play like they are a woman in order to get these men to send them dick pictures. When men send these dick pictures to inmates cell phones then they play the mad daddy stating I found your dick pictures in my underage babygirl cell phone and I am calling the cops to have you reported and arrested but if you agree to pay this \$10,000 dollars to me maybe \$1,500 a week until paid off I am willing not to contact police Dept my kid needs counseling due to this.

Statement OF Facts

Thus fraud and lies to get money this money is then given to staff main staff women to buy drugs, cell phones, and tobacco to be brought in by these same (BDOC) Staff mailroom staff, nurses, CO's, Classification, mental health staff, all conspiring and making money due to this fraud. on 9/16/23 or before while inside F-5 A-Side unit I was denied showers for 15 days cell #247 and I was GP 2 inmate toilet water turned off for 11 days, denied law library knowing I had pending writ of Mandamus 23-5218 Case Number No. 23-5218, denied law library for PCR case 2022-CP-10-2017, 2022-CP-10-5575, I filed grievances, denied to see my mental health counselor. my grievance that I turned in on 9/13/23 that I placed in LT June hands were given to gang member who came to my cell 247 F-5 A side see video Cam of F-5 A side from 9/13/23 until 9/27/23 stating to me that why you give grievance to C.O filing grievance on staff. You don't know where you at?

Statement OF Facts

This is our prison we run this lights out at 5:30pm don't care if you have pending case or not read Bible when we tell you too pray when we tell you too. We are going to have C.O staff pop your cell door stab your ass up break your arm and have you ran out the unit like we did all the other inmates we run this prison us and gang connected staff. LT Presley left food on flap feeding flap for over an hour while roaches to crawl all over while she open all other inmates flap to feed them thus violation of equal protection of the laws all because I file lawsuit, writ of Mandamus, PCR case, vindictive prosecution.

Statement OF Facts

pain towards known mental health prisoner as ^{Page 13} violation of T.R. V, South Carolina Dept. of Corr. 2005-CP-40-2925 something done in this case is being done to me since I came into the SC Dept of Corr. I filed grievances talked to all staffs, wardens, about being denied mental health staff. Everytime I request to see mental health staff I am being denied by mental health staff, medical and (SCDC) staff denied meds by staff then as a result of being off meds due to actions by staff, mental health staff, SCDC officers in connection with gangs I am charged with false sworn charges not taken to DHO in violation of Wolff v. McDonnell, SCDC policy on due process and convicted everytime based upon known perjury statements by staff known to lie and placed false charges on me.

Statement OF Facts

All in connection with gangs and Cpt Greene gang all white conspiring to deprive me of my constitutional rights, all defendants in this civil action conspired together as a unit on whole to deny me of my civil Human, and constitutional rights treating me less than a man less than dirt dogs and cats get treated better than me. I have been denied showers over (90) days not fed for over (11) days in a row lost 35 lbs in less than (90) days, denied access to law library since Feb 13, 2023, denied jacket with access to law library B Nobel Drew Ali Bible for 8 months and counting still denied, denied mat to sleep on, State uniforms still denied since May 8, 2023,

Statement OF Facts

Denied phone calls legal or Family since 5/8/23, with court documents as proof denied by staff in connection with gangs. In which I was told by gangs staff have do not care about constitutions or policy we don't follow that bullshit. Every letter grievance I file is being given to gang members. My incoming legal mail is being held pass 48 hours being denied outgoing and incoming mail legal and non-legal staff mailroom stealing mail out of legal mail that comes to me contact United States Supreme Court Clerk Scott S. Harris as proof. Placed on Bhu unit and charged with weapon I got to defend me against gang members that came to my cell F-5-A-Side cell # 247 see vide cam dates 9/13/23 to 9/27/23 these inmates threaten known mental health inmate that off meds due to staff denial to give meds to me then threaten by gangs for filing grievances and when I arm myself to defend [redacted] against these gangs I am charged 'ried' on and placed [redacted] on me and found guilty everytime 41 sworn charges found guilty of

Statement of Facts

page 14

No matter if I have witnesses or not all based upon known lies by officer is at and enough evidence to support finding me guilty taking good time and other rights. Everytime I do have DHO hearing disciplinary hearing officer kicks me at hearing for freedom of speech stating I have no such rights. She dont believe in the constitution She is above the constitution I am not allowed to speak at all at none of my DHO hearings nor present evidence or anything everytime I file grievances I am falsely charged and convicted.

Statement of Facts

I have been assaulted by Cpt Greene more than seven times sprayed with pepper spray by staff over Rhu unit over 7 times while in handcuffs locked inside cell #79 Rhu unit cell #79 Rhu unit from 5/23/23 until 9/13/23 with 17 sham charges or more all found guilty of sprayed for requesting breathing treatment 7 times knowing I suffer from bronchitis with inhaler in which they took from me stating I did not get that issued from medical nurse on cam stating that also. Then on or about July or Aug, or Sept a nurse brought new inhaler from Ridgeland Care Trust in which staff hide from me knowing they sprayed me 7 times turn cell water off no shower and I had to put head in toilet to was pepper spray off.

Statement of Facts

Even officer MS. Benjamin sprayed me one day while officer Price was at flap speaking to me in which she stated sorry but never called medical this same officer along with LT Pressley denied feeding me with Cpt Greene along with no showers at all for me petitioning the courts for wrongful conviction, false arrest, malicious prosecution, sham legal process, conspiracy to deprive constitutional & civil rights, abuse of power, abuse of use of governmental use of office, fraud, and inhumane prison conditions and treatment. These officers along with defendant's as a whole individually and as a whole unit conspired using there connections within the penal and judicial system to deprive me of my civil rights. I talked to Attorney General and Judge Young about whats being done Christopher L. Murphy, Ashley Pennington, and Ben Lewis all know about this and refuses to do anything because they all are allowing this to happen to me telling these people to do this to me these defendant stand under the confederacy in which I feel this court is in connection with also.

Statement of Claim

page 15

every civil lawsuit I have filed this same Judge TMC - PTG always deny my case I request that my District Court case be transferred to Washington DC District due to conspiracy by this court the Judges TMC-PTG and the state of South Carolina. I wish to not have my civil lawsuit heard by no South Carolina Judge at all due to prejudice bias treatment in connection with these defendants. In which they all swear an oath to uphold the confederacy and not the constitution.

Statement of Facts

The law states that there is no immunity where governmental official deprive a citizen of their federal protected civil and constitutional rights in which all of the defendants in this civil action have done to me individually and as a unit under Jim Crow laws still till this day. Thomas Jefferson wrote declaration of Independence July 4, 1776 all men are made equal with rights given by God birthrights. All governmental officials including Judges have sworn an oath to uphold the constitution defend the constitution and uphold the Constitution not Jim Crow laws or the confederacy in which the state of SC refuses to let go of rooted within their hearts, souls, and minds they do not honor the constitution at all whatsoever.

Statement of Facts

As a result of this and Fed R. Civil R. 60(b)(4) relief from void judgments I request change of jurisdiction and have case move to district Court of Washington DC instead of district of South Carolina due to prejudice bias treatment. I further request a Protection order issued against SCDC staff, State of South Carolina all states in connections with SC and against all Defendants listed in civil lawsuit I further request access to law library and Tablet to study and fight case or appointment of counsel to help me if I am to be denied access to law library which I am.

Since 2/13/23 and counting.

Certificate And Contralling effect of Substantial
Grounds not Previously Presented.

page: [REDACTED] 16

Petitioner States under penalty of perjury that all statements stated herein today are true and correct so help me God. The petitioner states that this petition is not done in bad faith but is done in good faith to bring about justice in a manner where justice is very much need with due process state/federal equal protection of the laws in the deliberate failure of the Chief Administrative Judge for the Ninth Judicial Circuit Roger Young SR., PCR Judge R. Levee Griffin & PCR Judge Kristi F. Curtis willful deliberate failure to enter Judgment on certain void judgments, sentence plea, & conviction based upon summary Judgment motion, motion for relief from void Judgment SERCP Rule 60(b)(1), Smith v. Standers, Ware v. Ware, motion to vacate void sentence/Judgment based on SERCP rule 60(b)(5), pro se proposed order sent to the Honorable Judge Roger Young SR. Chief [REDACTED] Administrative Judge Roger Young SR. of Ninth Circuit Charleston County SC., writ of mandamus filed with the United States Supreme Court raising all issues and allegations stated herein along with the additional allegations stated herein not previously presented in original petition of writ of mandamus.

(1) Due Process Violation Conviction Without Grand
Jury Indictment or Signed waiver

Petitioner states that his Judgment is void due to the fact that his conviction for attempted armed robbery, in which the petitioner pled guilty to on 10/21/21 before the Honorable Judge Jefferson was based upon fraud, misrepresentation, and without full disclosure of evidence, further in violation of Due Process, due to the fact that the Petitioner was convicted without grand jury indictment or signed waiver of indictment in which is required and mandatory before Judge accepting guilty plea. SC Code Ann § 17-19-16, SC Const. Art 1 § 11 and the case of State v. Clark, 470 SE2d 54 (1996), Phillips v. State 314 SE2d 313 (1984), State v. Daniel McNeal 445 SE2d 461 (1994) State v. Clarkson 523 SE2d 817 (1999) American Jurisprudence Second Edition May 2022 Section 35 Availability of Habeas Corpus relief due to lack of indictment or failure to indict. Further stating in SC Code Ann § 17-23-130, and SC Code Ann § 17-23-140 indictment waiver must be in writing only and not orally. Petitioner states that conviction without this procedure renders plea, conviction and sentence void, invalid, and unconstitutional further violation of Due Process and ineffective assistance of counsel. Failure of All Three Judges to enter Judgment addressing these issues in motions in support of PCR Application 17 month undue delay on Judgment by judges on these issues with the default thereof is an abuse of discretion for court and Judge to refuse to enter a judgment on these issues are unconstitutional. Thus further Substantive grounds not previously presented. The petitioner certify and states under penalty of perjury that all statements stated herein are true and correct so help me God petition further is being brought in good faith in order to ensure justice with Judgment entered on certain issues pending before the court without undue delay and within a

(4) Suggestive one-on-one showup Procedure
Failure To Have Neil V. Biggers Hearing

page [REDACTED] 17

Petitioner states that conviction without Neil V. Biggers hearing on invalid so-called one-on-one show-up identification after requesting of plea counsel to request such hearing further requesting to have such identification suppressed. Further without counsel present during invalid one-on-one show-up identification while petitioner was in back of EMS truck from 20 yards away being treated for mental health related issues and other physical health related issues. Petitioner requested of counsel to request hearing on so-called identification when the petitioner received Rule 5 from plea counsel a few weeks or two ago it shows that there was no identification ever made by no one except two victims (which stated on Photo Line up form and statement stating that they were not able to make identification of the Applicant at all due to suspect wearing face mask further [REDACTED] picking same suspect other than petitioner thus counsel was ineffective in this manner and by knowing these stated facts and under these circumstances still advising the petitioner to plea guilty thus fraud, due process violation, misrepresentation, perjury conspiring with solicitor to get the petitioner to plea guilty knowing this and further done in bad faith without FULL DISCLOSURE OF Rights render guilty plea further invalid as well as judgment void due to violation of due process State/Federal conviction without this procedure and for Judge to not enter Judgment on 17 months unduly delay in PCR hearings and based upon PCR motions in relation to PCR Petition for Judges All three to refuse to enter judgment in this matter on these issues 17 months and counting is a due process violation and matter where writ must be issued to ensure justice in this case and judgment to do otherwise would be an abuse of discretion error of law and violation of equal protection of the laws. This issue raised for first time by mandamus and substantial grounds not previously presented done in good faith to ensure justice in PCR unduly 17 month judgment delay on motions of PCR related. (S) Failure To Have A State V. Blair Hearing
ONCE FOUND INCOMPETENT BEFORE GUILTY PLEA
motions to PCR.

Petitioner states that conviction is void due to conviction without State V. Blair Hearing after the petitioner was found to be incompetent before guilty plea and sent to state mental health center Just Care in Columbia SC as in accordance with State V. Blair and SC Code Ann. § 44-23-430, 44-23-410 further in which is mandatory. Before Judge can accept guilty also equal protection of the laws State/Federal due process violation rendering judgment void further ineffective assistance of counsel to still know this and under these circumstances advise the petitioner to plea guilty rendering judgment void therefore due process violation. PCR Judges and Chief Administrative Judge in error abuse of discretion to still knowing these stated facts refuse to enter judgment on these issues presented by motions in connection with PCR petition 17

American Jurisprudence Second Edition May 2022 Section 35 Availability of habeas corpus relief
 § Post Conviction Remedies, states that if the crime of which the defendant stands convicted
 is one for which the defendant could be held to answer only on the presentment or
 indictment of a grand jury and the defendant was not indicted or presented, his or her
 conviction is void and the defendant may be released on habeas corpus or post-conviction
 American Jurisprudence Second Edition May 2022 Section 35 Availability of habeas corpus
 relief due to lack of indictment or failure to indictment Habeas Corpus & Post-Conviction
 Remedies.

American Jurisprudence Second Edition May 2022 C. Waiver of indictment & Information Section
 16 Effectation waiver see also S.C. Code statute 17-23-130, 17-23-140, State v. Clarkson, 523
 SE2d 817 (1999), Odum v. State, Clark v. State, American Jurisprudence Second Edition Indictment &
 Information May 2022 update Section 7 Effect of Lack of Indictment states that: In the
 absence of the defendant's permissible waiver of indictment, the lack of a constitutionally
 required indictment as per [S.C. Const Art 1 Section 11] is a jurisdictional defect. If there
 is no indictment, information, or charging document for an offense any conviction for the
 offense is void and must be vacated.

SCRCP Rule 12(a) states that the Attorney General has (30) days time limit to respond to
 this motion failure to do so would render allegations stated within motion as deemed admitted
 further grounds for entry of default judgment as in accordance with SCRCP Rule 55(c)
 Default Judgment failure to defend or respond to a complaint motion, pleadings within
 (30) days as required by SCRCP Rule 12(a), responsive pleadings: Is a pleading that
 replies to an opponent's earlier pleading see = answer: A defendant's first pleading
 that addresses the merits of the case by denying plaintiff's or Applicant's allegations. Stedman's
 made within complaint motion PCR Application, pro, & motions such as Summary Judgment
 motion, motion for relief from void judgment, motion to vacate void judgment as in
 accordance with SCRCP Rule 60(b)(4) void judgment.

Black's Law Dictionary (11th ed 2019) states that Post conviction relief proceeding is a state
 or federal procedure for a prisoner to request a court to vacate or correct a conviction
 or sentence.

Butler v. Does South Carolina (2009): Claim dismissed for failure to prosecute as plaintiff failed
 to adequately respond to a motion for summary judgment and failed to respond after two
 extensions were granted. Failure to respond to Summary Judgment within (30) days even
 after extension grounds for granting Summary Judgment, on motion for Summary Judgment
 trial court may refuse to consider materials that are not timely served, such that opposing
 party had no time to respond. Rules of Civil Procedure, Black v. Lexington School Dist no 2
 327 SC 55 (1997).

CASES IN SUPPORT OF CASES

page 19

State v. Moses 202 SE2d 395 (2010) States in part that while Brady imposes a duty on the state to disclose material evidence favorable to the defendant, the state has the additional duty, albeit not absolute duty, to preserve evidence that is favorable to the defendant.

Evidence is material for Brady purposes, only if there is a reasonable probability that had the evidence been disclosed to the defense the results of the proceedings would have been different. State v. Moses 702 SE2d 395 (2010). Applicant states that had plea counsel and solicitor disclose entire Rule 5 Disclosure of evidence with 911 phone call sham indictment presented to Applicant (15) months after guilty plea sham indictment was presented to applicant along with recording of 911 phone call of incident arrested and convicted for was presented to applicant on Oct 26, 2023 2 years and 6 days after guilty plea thus prejudice applicant due to the fact these documents along with other documents within rule 5 [redacted] disclosure presented to the applicant so many years deprived Applicant of a fair hearing and trial violated due process equal protection of the laws rendering judgment void there could further Brady v. Maryland Q3 Sect 1194 violation

CASES IN SUPPORT OF CASES

- (1) Austin v. Beaufort County Sheriff's Office 659 SE2d 122 (2008)
- (2) Black v. Lexington School Dist No 2 488 SE2d 327 (1997)
- (3) State v. Blair 273 SE2d 536 (1981)
- (4) Matthews v. State 596 SE2d 49 (2004)
- (5) S.C. Code of Laws Statute 44-23-430
- (6) S.C. Code of Laws Statute 44-23-410
- (7) Martinez v. Ryan [redacted] 132 S.Ct 1309
- (8) Brady v. Maryland Q3 Sect 1194
- (9) Murray v. Carner 472 US 478
- (10) State v. Woods 508 SE2d 857
- (11) Moore v. Illinois 98 S.Ct [redacted] 458 (1977)
- (12) Neal v. Biggers 93 S.Ct 375 (1972)
- (13) Smith v. O'Grady 312 US 329 (1941)
- (14) US v. Wade 388 US 218 or 710
- (15) State v. Liverman 727 SE2d 402 (2012)
- (16) State v. Moore 546 SE2d 455 (2000)
- (17) State v. Stanley 615 SE2d 458
- (18) S.C. Code of Laws Statute 16-9-10
- (19) United States of America v. Calvin Antonio Bonner 648 F.3 209
- (20) S.C. Code of Laws Statutes 14-7-1700, 14-7-1756, 14-7-1720
- (21) Galt v. Berkeley County Sheriff's Dept 521 SE2d 163
- (22) State v. Johnson 407 SE2d 719

page 20 Exhibit 41

Agency: Charleston Police Department
Officer: Williams Crockett

REQUEST FOR PRELIMINARY HEARING

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

May 22, 2020
VIA E-MAIL

Date of Bond Hearing: May 14, 2020

Uniform Warrant Numbers: 2020A1010202727; 2020A1010202728; 2020A1010202730

Jerome Curry, you are charged with Robbery / Armed Robbery, robbery while armed or allegedly armed with a deadly weapon; Assault / Assault & Battery 1st degree; Weapons / Poss. weapon during violent crime, if not also sentenced to life without parole or death and you are entitled to a Preliminary Hearing. **You must Request** a Preliminary Hearing before the Roll Call Date, but no sooner than five (5) days following the bond hearing, by completing the lower left section of this notice and returning it to the Court either in person or by mail to the following address:

Preliminary Hearing Court
3831 Leeds Avenue, Suite 100
North Charleston, SC 29405

I request a Preliminary Hearing*

Notice Given By:

Defendant:
Jerome Curry

Address:
None @ moment
Charleston,

My Attorney is:
Benjamin C. Lewis
Assistant Public Defender
Charleston County Public Defender's Office

(Judge)

(Date)

* I also request that my client be transported from the detention center and present for any hearing when the State files a motion to revoke or to increase the bond previously set in this case.

-----Original Message-----

Page 22 Exhibit 3

From: Susan Knight <knight@apsforensic.com>
Sent: Tuesday, August 24, 2021 12:53 PM
To: Ben C. Lewis <BLewis@charlestoncounty.org>
Cc: Art DeGiovine <AMDeGiovine@charlestoncounty.org>
Subject: Re: Jerome Curry Roper Records

CAUTION: This email originated outside of Charleston County. Do not click links or open attachments from unknown senders or suspicious emails. If you are not sure, please contact IT helpdesk.

Showing history of mental illness

Well this is frustrating! They sent records from 2015 to 2019. Did not include any mental health records, and most importantly, did not include the 5/13/20 visit from the his arrest. This visit date is referenced in the records, as having a visit for reason of Bipolar, PTSD, etc. but no actual records from this visit. If we're establishing mental illness on 5/13/20, we need these. Just making sure there's not a second PDF of records? (I received one with 185 pgs.).

If not I will send a STAT request to see if that works.

Thanks, Susan

Susan C. Knight, Ph.D., ABPP
Board-Certified Forensic Psychologist
1941 Savage Rd., Ste. 100A-606
Charleston, SC 29407
843-637-5729 (tel.)
843-410-2802 (fax)

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On 8/24/21, 11:43 AM, "Ben C. Lewis" <BLewis@charlestoncounty.org> wrote:

Dr. Knight,

I've scanned in the records for Jerome Curry that I just received. Please let me know if you need anything else as we work towards getting his case resolved.

Thanks,
Ben

-----Original Message-----

From: copier6thfloor@charlestoncounty.org <copier6thfloor@charlestoncounty.org>
Sent: Tuesday, August 24, 2021 8:53 AM
To: Ben C. Lewis <BLewis@charlestoncounty.org>
Subject: Message from "RNP002673EF7F15"

This E-mail was sent from "RNP002673EF7F15" (MP 6055).

Scan Date: 08.24.2021 08:52:38 (-0400)

Get Outlook for iOS

page [redacted] Exhibit # [redacted] 2

page 21 Exhibit 2

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Fido was incredibly ill at time we left and should have not been allowed fully on high speed & unstable.

I've recently received his MUSC and competency restoration records. However, I don't have his Roper records yet. Per the body cam video (which was very helpful for mental state!) he was taken to Roper when they arrested him. He certainly seemed manic and paranoid but I'd like to see the records (he also has a long history at Roper with psychiatric issues). I will follow up with them next week. In the meantime, we can get him on the calendar for a second interview to talk about the incident. (I didn't have the discovery when I saw him the first time). Let's schedule his return for Tuesday 6/22 at 9:30 a.m. Who is your investigator on his case? I can reach out to them, as they may be able to assist with the Roper records.

Susan C. Knight, Ph.D., ABPP
Board-Certified Forensic Psychologist
1941 Savage Rd., Ste. 100A-606
Charleston, SC 29407
843-637-5729 (tel.)
843-410-2802 (fax)

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From: "Ben C. Lewis" <BLewis@charlestoncounty.org>
Date: Thursday, June 10, 2021 at 2:32 PM
To: Susan Knight <knight@apsforensic.com>
Subject: JC

Dr. Knight,

DAMAGES

page 23

- (1) Loss of yrs of my Life
- (2) Forced to Grow up from teen to adult in Prison
- (3) Witnessed Stabings, Killings, men being rape & assaulted
- (4) Forced to be a man before my time
- (5) Lost Grandmothers that raised me while in Prison
- (6) MY Mother's Mom Became very ill resulting in death she raised me also
- (7) Lost a lot of childhood friends who got killed while I was in prison
- (8) MY mother was forced to move and live in areas that she did not like
- (9) MY babysister was fuck the wrong way I could not protect her due to being in prison and she blames me. Same man that done this to her was also Counsel for the men that fuck my sister while she was 3yrs old and he was allowed to call her while I receive 15 years
- (10) Was Determine by mental health experts to have Bipolar Disorder PTSD & Paranoid schizophrenia after a few months of release from 15 year wrongful conviction. In and out of mental hospitals and State Mental health hospitals since then. To receive no compensation Disability nothing no assistance other than EBT. SNAP Benefits denied everything else.
- (11) I have flashbacks fits of rage hate within my heart toward society & people in uniform police officers, security guards, Judges, lawyers, doctors, solicitors, and people that share the same skin tone as me.
- (12) I have sleepless nights, unable to sleep must take sleeping meds just to sleep.
- (13) Every now & then I have visits from friends that are dead and has been dead since the 90s
- (14) I have feelings of depression from time to time doubt worthiness
- (15) I have feelings of being assaulted by Police and people on the streets paranoid at times hearing voices at times with very bad head aches
- (16) I have been unable to get or hold a job
- (17) I have racing thoughts at times.
- (18) I blackout at times not remembering anything that I have done at all.
- (19) I care to be alone at many times more than others do not trust people period
- (20) when around a lot of people I get uneasy and isolated.
- (21) I feel isolated when and when not isolated
- (22) At times I have days of sadness, ~~Worthlessness~~, unforgiveness, hate, & rage.
- (23) I like to be alone now more than anything
- (24) I had very hard time in relationships with women unable to trust and love them
- (25) I have thoughts of death dying more now than ever
- (26) I am unable to think clearly
- (27) I am unable to love anyone
- (28) Loss wages =
- (29) Loss of enjoyment in Life
- (30) Broken Relationships
- (31) Pain & Suffering
- (32) Mental distress
- (33) Loss of future earnings

Freeze Respondent's accounts all accounts assets.
Pensions Retirement Plans 401k Plans Life
Insurance Policies Property, Land, House, cars,
boats, anything of value until payment on full.

TOTAL Amount For Punitive Damages
\$ 500 million IN Bank of CHINA

6yrs wrongful conviction of teen.
Half CASH Half Gold Bars 40% CUBA money
45% China money 15% US Paper money.

DAMAGES

page 24

- (1) Loss of 6yrs of my Life
- (2) Forced to Grow up from teen to adult in prison
- (3) Witnessed Stabings, Killings, men being rape & assaulted
- (4) Forced to be a man before my time
- (5) Lost Grandmothers that raised me while in prison
- (6) MY Mother's Mum Became very ill resulting in death she raised me also
- (7) Lost a lot of childhood friends who got killed while I was in prison
- (8) MY mother was forced to move and live in areas that she did not like
- (9) MY baby sister was fuck the wrong way I could not protect her due to being in prison and she blames me. Same man that done this to her was also counsel for the men that fuck my sister while she was 3yrs old and he was allowed to walk free while I receive 15 years
- (10) Was Determine by mental health experts to have Bipolar Disorder PTSD & Paranoid Schizophrenia after a few months of release from 15 year wrongful conviction. In and out of mental hospitals and State Mental health hospitals since then. To receive no compensation Disability nothing no assistance other than EBT. SNAP Benefits denied everything else.
- (11) I have flashbacks fits of rage hate within my heart toward society & people in uniform police officers, security guards, Judges, lawyers, doctors, solicitors, and people that share the same skin tone as me.
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- (31) Pain & Suffering
- (32) Mental distress
- (33) Loss of future earnings

Freeze Respondent's accounts all accounts assets
Pensions Retirement Plans 401k Plans Life
Insurance Policies Property, Land, Houses, cars,
boats, anything of value until payment in full

TOTAL AMOUNT FOR PUNITIVE DAMAGES
\$ 500 million IN BANK OF CHINA

6yrs wrongful conviction of teen.
HALF CASH HALF Gold Bars 40% CUBA money
45% China money 15% US Paper money.

Exhibit #

page

25 page



Charleston Police Department

Photo Line-up Admonition

OCA: 20-05837 Offense: Robbery Date: 5/13/20 Time: 1700

Presenting Officer (Name\Reporting Number): WT Crockett

Name: Mark Michael Hoffman Phone: [REDACTED]

Alt. Phone Number: _____

READ THE FOLLOWING PARAGRAPH OUT LOUD

I am going to show you a group of photographs. These photos may or may not contain the picture of the person(s) who committed the above listed offense, which is under investigation at this time. Keep in mind that the photos may show a variance in complexion, hair, eyes, facial hair, etc. If you recognize anyone in any of the photos as a person who committed the crime against you (or you were a witness to), I will ask you to initial and circle the photo.

Upon viewing these photos, do not discuss the results of this procedure with other victim(s) or witness(es).

I (☐ WAS ☒ WAS NOT) able to make an identification from the photographs shown.

Photo Number 3 (CLOSEST) TO MERRY

Signature: [Signature]

OTHER COMMENTS: _____

Charleston Police Department
180 Lockwood Blvd Charleston, South Carolina 29403
(843) 577-7434

FORM 52-A
Revision 20160430

[EXHIBIT #] 2

page 26



Charleston Police Department

Photo Line-up Admonition

OCA: 20-05837 Offense: Robbery Date: 5/13/20 Time: 1647

Presenting Officer (Name/Reporting Number): W T Crockett 2387

Name: Michaela Byrd Phone: [REDACTED]

Alt. Phone Number: _____

**READ THE FOLLOWING
PARAGRAPH OUT LOUD**

I am going to show you a group of photographs. These photos may or may not contain the picture of the person(s) who committed the above listed offense, which is under investigation at this time. Keep in mind that the photos may show a variance in complexion, hair, eyes, facial hair, etc. If you recognize anyone in any of the photos as a person who committed the crime against you (or you were a witness to), I will ask you to initial and circle the photo.

Upon viewing these photos, do not discuss the results of this procedure with other victim(s) or witness(es).

I ☐ WAS ☒ WAS NOT) able to make an identification from the photographs shown.

Photo Number _____

Signature: Michaela Byrd

OTHER COMMENTS: He wore a mask - if was between 103 in photos -

Charleston Police Department
180 Lockwood Blvd Charleston, South Carolina 29403
(843) 577-7434

FORM 52-A
Revision 20160430

Suspect picked

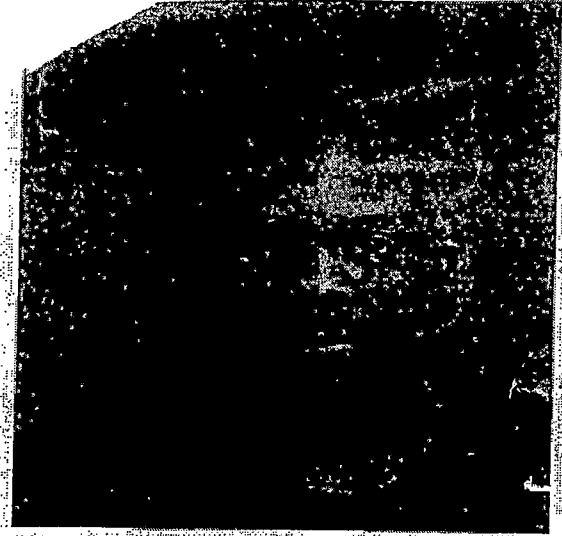
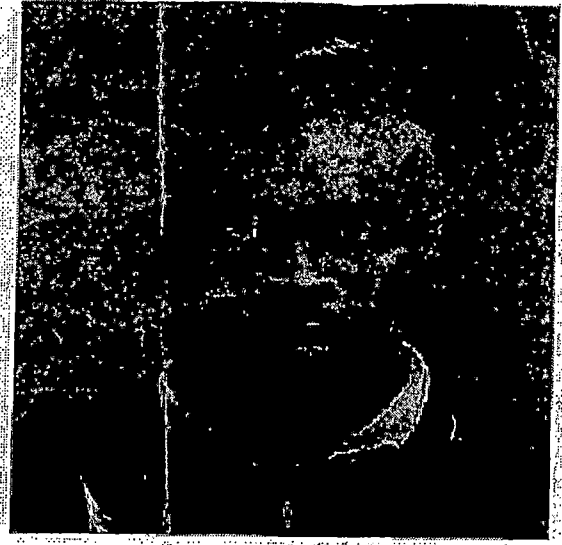


Exhibit #
Page 128



Appellate Court



Exhibit #
Page 127

EXHIBIT # [REDACTED] 4

page [REDACTED]

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STATE OF SOUTH CAROLINA

INDICTMENT

COUNTY OF CHARLESTON

At a Court of General Sessions, convened October 2021, the Grand Jurors of Charleston County present upon their oath:

ATTEMPTED ARMED ROBBERY

That on or about May 13, 2020, in Charleston County, South Carolina, the Defendant, Jerome Curry, by use of force, threats or intimidation and while armed with a deadly weapon, or while alleging, either by action or words, she was armed while using a representation of a deadly weapon or any object which a person present during the commission of the robbery reasonably believed to be a deadly weapon, did attempt to take and carry away goods and/or monies from the person or immediate presence of Michaela Patricia Byrd with the intent to permanently deprive the victim of possession thereof, in violation of §16-11-330(B) of the South Carolina Code of Laws (1976) as amended.

NOTE:

Applicant states under penalty of perjury that this statement is true and correct.

NOTE:

This victim stated herein name Michaela Patricia Byrd stated on 5/13/20 on Photo Line UP form 52-A of Charleston Police Department presented by officer W.T. Crckett #2387 checked box on this form was not able to make identification from the photographs shown and further picked up different suspect other than Applicant. knowing the fact Plea Counsel still advise Applicant to Plea Guilty And Solicitor refused to drop or dismiss charges against Applicant. This malicious prosecution abuse of power, abuse of process, perjury, and abuse of government office. Applicant was presented with this information on 1/31/23. Ple Counsel knew this & still advise Applicant plea guilty.

Against the peace and dignity of the State, and contrary to the statute in such case made and provided.

Stephanie B. Linder
STEPHANIE B. LINDER
ASSISTANT SOLICITOR

EXHIBIT # [REDACTED] 2(c)

- 1) Arrest Warrant \ Affidavit - 2020A1010202727, 2020A1010202728,
2020A1010202730

III. Statements			
Name	Type of Statement (Victim \ Witness \ Suspect \ Other)	Type of Media (Audio \ IRSA \ Written)	Date
1) Michaela Byrd	Victim	Audio	5/13/20
2) Mark Hoffman	Witness	IRSA	5/13/20
3) Emma Kennerty	Witness	IRSA	5/13/20
4)			

IV. Photos and Video (Excluding Veripic Photos)

- 1) Surveillance Video \ Photos from 484 Savannah Highway (5/13/20)
- 2) Body Worn Camera Video (5/13/20)

V. Identification

Only two witness identify me is stated below affidavit states

- 1) Photo Line-up shown to Michaela Byrd with admonition form (5/13/20).
- 2) Photo Line-up shown to Mark Hoffman with admonition form (5/13/20).

VII. Dispatch Records

- 1) Call Log Information (5/13/20 / 1440)
- 2) 911 Recordings \ Radio Transmission

VIII. Lab Reports \ Crime Scene Information

- 1) Evidence List (6/18/20)

IX. Miscellaneous Additional Information

- 1) Receipt listing items stolen (5/13/20)

NOTES:

AGENCY CASE NUMBER

2020-05837

ARREST WARRANT NUMBER

2020A1010202727

DATE OF ARREST

05/14/2020

ACTION OF GRAND JURY

Foreperson of Grand Jury

Date:

VERDICT

Foreperson of Petit Jury

Date:

COURT OF GENERAL SESSIONS

OCTOBER 2021 TERM

THE STATE

VS.

JEROME CURRY AKA.

B/M DOB: [REDACTED]

Indictment for

ATTEMPTED ARMED ROBBERY

SC Code: § 16-11-0330(B)

CDR Code: 0026

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

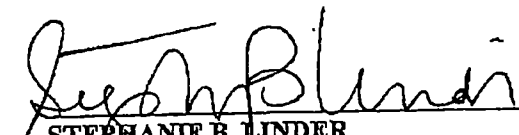
INDICTMENT

At a Court of General Sessions, convened October 2021, the Grand Jurors of Charleston County present upon their oath:

ATTEMPTED ARMED ROBBERY

That on or about May 13, 2020, in Charleston County, South Carolina, the Defendant, Jerome Curry, by use of force, threats or intimidation and while armed with a deadly weapon, or while alleging, either by action or words, she was armed while using a representation of a deadly weapon or any object which a person present during the commission of the robbery reasonably believed to be a deadly weapon, did attempt to take and carry away goods and/or monies from the person or immediate presence of Michaela Patricia Byrd with the intent to permanently deprive the victim of possession thereof, in violation of §16-11-330(B) of the South Carolina Code of Laws (1976) as amended.

Against the peace and dignity of the State, and contrary to the statute in such case made and provided.


STEPHANIE B. LINDER
ASSISTANT SOLICITOR

Plea Bargains are essentially contracts: Garza V. Idaho 139 S ct. 738 United States Supreme Court.

All of these terms listed herein from out of the Blacks Law Dictionary (11th ed 2019) have been violated and not followed in Applicant pending case before this Honorable Court as evidence to support pending PCR Case No: 2022-CP-10-2017. Based upon all statements stated herein today within this motion the Applicant moves before this Honorable requesting that court vacate Applicants void sentence as a matter of law and justice in this matter this day.

SUPREME LAW OF THE LAND

CLAUSE 2. SUPREME LAW OF LAND: USCA CONST. ART.VI cl 2., States That this constitution and the laws of the united states shall be made or which shall be made, under the authority of the united states, shall be the Supreme Law of the Land; and all the judges in every state shall be bound thereby anything in the constitution or laws of any state to the contrary notwithstanding.

USCA CONST. AMEND XIV, SETION 1. States all persons born or naturalized in the united states and subject to the jurisdiction thereof, are citizens of the united states and of the states wherein they reside. No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the united states; nor shall any state deprive any person within its jurisdiction the equal protection of the laws. Therefore sentence, plea, and conviction must be vacated to do otherwise would be a total denial of justice, due process, equal protection of the laws, as well as an abuse of discretion to still allow the Applicant to still serve void sentence knowing this further unconstitutional ~~without vacating~~ this unlawfull sentence.

**AND IT IS SO ORDERED ON THIS _____ day of _____
2023, _____ South Carolina.**

Signature of Judge.

STATE OF SOUTH CAROLINA
County of Charleston
Jerome: Curry [Flesh And Blood Man]

vs.

STATE OF South Carolina

IN THE SUPREME COURT OF SOUTH CAROLINA
WRIT OF Mandamus & Writ of Certiorari
CASE NO: _____

AFFIDAVIT OF SERVICE BY MAIL

AFFIDAVIT OF SERVICE BY MAIL

1. I am the above entitled petitioner in this action being presented pro se herein today.
2. I hereby certify and declare under penalty of perjury that I have served this petition on the following parties listed below on this _____ day of _____ 2024
3. By placing in the hands of Correctional Officers here at LCI GPH to be placed in prison mail box and mailed to all of the following address listed below by US postal mail service so help me God this is true and correct.

Respectfully submitted on 21st day of March 2024

BV151 Jerome: Curry [Flesh And Blood Man]
Jerome: Curry [Flesh And Blood Man]

The Supreme Court of South Carolina
Clerk of Court
Patricia A. Howard
P.O. Box 11336
Columbia SC 29211

South Carolina Office of Attorney General
Danielle Dixon / PER Division
P.O. Box 11549
Columbia SC 29211

Jerome: Curry [Fresh And Bloodman] #253067

KCT / GPH B-Side cell #120

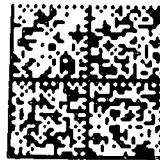
4434 Broad River Road.

Columbia SC 29210

RECEIVED

MAR 27 2024

S.C. SUPREME COURT



US POSTAGE **PITNEY BOWES



ZIP 29210 \$ 002.83⁰
02 4W
0000378357 MAR 22 2024

Legal Mail

The Supreme Court of South Carolina

Legal Mail

Clerk of Court

Legal Mail



Patricia A. Howard
P.O. Box 11370
Columbia S.C 29211

RECEIVED

SCDC

APR 15 2024 MAR 22 2024

Kirkland RSE Center,
MAILROOM Mailroom