

The Honorable Julie J. Armstrong

[REDACTED]

Clerk of Court
100 Broad Street, Suite 100
Charleston SC 29401

Dated April 5, 2024

Dear Julie J. Armstrong

Enclosed change of venue in the above entitled case please
stamp check and file on my behalf and forward copy to the
Clerk admin. Judge Jennifer B. Meloy for her approval. Thank
you send copy back to me for my records for case
2022-CP-CO-2017. Thanks

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APR 10 2024

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON
Jerome G. Curry (Flesh and Blood Man)

IN THE COURT OF COMMON PLEAS
CASE: 2022-CP-10-2017
CASES: 2020-CP-10-05357

Motion For Change of Venue

vs

STATE OF SOUTH CAROLINA

CHANGE OF VENUE

Now comes the petitioner with the above entered motion change of venue. The petitioner [redacted] hereby states that he has been receiving bias treatment from the judges in SC that is within the South Carolina area and circuit judges from other County. Every judge that the petitioner has went in front of denied him a chance to present his case.

(1) All of these judges conspired along with the attorney general to deny petitioner the right to a fair hearing while allowing the attorney general to commit fraud present detainee while she is in default thus due process violation, equal protection of the laws

(2) These judges have sworn an oath to uphold the constitution in which they all have failed to do not once allowing the petitioner to speak in court at all present no [redacted] evidence nor state his claim only allowing the attorney general to do this in which is [redacted] violation of [redacted] due process equal treatment bias treatment.

CHANGE OF VENUE

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- (3) Petitioner when he is allowed to speak at PER hearing he is always cut off while the Judges allow Attorney General right to speak present sham documents and motions against laws and statutes further in violation of Supreme Court rulings as well as pursuant to the SC Constitution and United States Constitution.
- (4) Petitioner states that the Attorney General Donella Dixon should be removed off of case due to fraud misrepresentation providing court with sham documentation all done for the delay of case over 2 years and counting knowing that she has no legal justification or defense against petitioner claims done in bad faith. done in order to make the plaintiff/petitioner give up and withdraw his PER claim which he refuses to do.

CHANGE OF VENUE

- (5) Petitioner move this case to send this PER case to the Federal District court to be heard instead of by circuit court judges that are in connection with the courts in SC South Carolina. Petitioner feels that he will receive no justice and will be prejudice by courts in SC and as a result of this fact move court for change of venue to have case heard in Federal District Court under habeas corpus instead of PER within state courts so that that court can enter rightful judgment and honor constitution.
- (6) Petitioner max-out date to this void judgment will be June of 2025 with note credits there's no hearing for June Attorney General office stated do not know when another hearing will be set every hearing set Attorney General waits until day of hearing to request a later date 4 times in a row 9 months the attorney general had to get an evaluation on petitioner and failed to do so like the attorney general did not know petitioner was being denied court ordered mental health treatment using this to keep plaintiff/petitioner confined with inhumane treatment trying to break petitioner to give up case PER court drop his case. With support of all judges due to civil lawsuit pending against the judges and the Attorney General Donella Dixon conflict of interest this Attorney General needs to be removed.

Conclusion of Law Findings OF FACTS

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(7) Based upon these stated facts stated herein the petitioner moves this court to remove case out of this Circuit and Court of Appeals and allow court of District Court of SC Federal District Court to hear this same case on habeas Corpus so that the petitioner receives justice as well as removing Attorney General Danielle Dixon off of case due to Federal District Court lawsuit pending against her, For conspiring to deprive the Petitioner of his civil, human and constitutional rights as well as frank misrepresentation of case knowing she does not have a legal defense at all in this case done in bad faith. Vindictive prosecution without probable cause in void judgment in which case is based upon conviction without indictment or signed warrant, preliminary hearing delay past 9 months along with

State vs. Blair hearing denial, Frank's hearing ^{Denial} [redacted], Neil vs. Biggers denial, insanity defense (Affirmative defense) denial. Petitioner states that as long as his case is in the Court of SC he will not receive justice fairness at all whatsoever and move court to transfer case to [redacted] Federal District Court instead.

The Attorney General has been in default over 20 times and still allowed to present motions on day of PCR hearing, practice due process violation and all PCR Judges allow this knowing this is due process violation.

Petitioner has put in motions to strike and Denial by all courts within SC and Attorney General is doing this in bad faith as stated before. Therefore, as a result of this fact I move to have attorney general Danielle Dixon [redacted] remove off of PCR case due to conflict interest lawsuit filed against her and judges within SC.

respectfully Submitted by: 151 Jerome [Elisham] [Elisham] [Elisham] on 5th day of April 2024.

STATE OF SOUTH CAROLINA
County OF Charleston
Jerome: Amy [Flesh And Bloodman]

IN THE COURT OF COMMON PLEAS

CASE NO: 2022-CP-10-2017

CASE NO: 2020-CP-10-05357

SWORN AFFIDAVIT

v.

STATE OF SOUTH CAROLINA

SWORN AFFIDAVIT

1. I am the above entitled petitioner in this action before this Honorable Court I move the court with this sworn affidavit in support of this [redacted] motion I am attaching with the petition herein. This is being presented in Good faith
2. All statements stated herein today are true and correct so help me [redacted] God, This AFFIDAVIT has not been presented in bad faith but in [redacted] good faith; Clean-hands - doctrine and to ensure justice in this matter
3. This Affidavit is based upon truth and nothing but the truth to help the court understand statements made herein this motion is true and correct. I hereby state declare and certify that all statements within this whole motion is true and correct so help me God.

My Commission Expires on ^(NY) 2/05/2024
 Notary Republic: Melissa D. Spigner
 Submitted by S/ Jerome Amy
 pro Jerome: Amy [Flesh And Bloodman]
 sc

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

Telome: Cony (Flesh And Blood man)


IN THE COURT OF COMMON PLEAS



AFFIDAVIT OF SERVICE BY MAIL

v

STATE OF SOUTH CAROLINA

AFFIDAVIT OF SERVICE BY MAIL

- I am the above entitled petitioner in this action presenting this motion on my  own behalf.
- I certify and declare that I have served a copy of this motion to all respondents listed below on this 5th day of April 2024.
- By placing in the hands of Correctional officers to be placed in prison mail box and mailed to all of the following addresses listed below:

The Honorable Clerk of Court
Jesse T. Armstrong
100 Broad Street, Suite 600
Charleston SC 29401

SC Attorney General's office
Dwaine Odum
P.O. Box 11549
Columbia SC 29211

Respectfully submitted by:
(S) J. Cony (Flesh And Blood man)
Pro, he

Jerome Cury (Flesh and Blood man)
Wickland Correctional Inst (Cell # 206 B-Side)
4344 Broad River Rd
Columbia SC 29210

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S.C. SUPREME COURT

The Supreme Court of South Carolina

Patricia A. Howard
Clerk of Court

P.O. Box 11330

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Kirby & E Center
Mailroom

SCDC
APR 15 2024
MAIL ROOM

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