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Sep 04 2024

SC Court of Appeals

FORM 7  
PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[I The Supreme Court]

APPEAL FROM CHARLESTON COUNTY

Court of General Sessions

Deadra L Jefferosn, Circuit Court Judge

Case No. 2022-A1010-202600

FILED  
2024 SEP -4 AM 9:33  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

State of South Carolina

Respondent,

v.

Margie Brown,

Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Alan McCrory Wilson Esquire, Mark Reynolds Farthing Esquire, Liane Dublinski Kozik Esquire, Kevin George Hales Esquire. By depositing a copy of it in the United States Mail, postage prepaid, on September 4, 2024, addressed to Charleston County Solicitor Office 101 Meeting Street STE 400 Charleston, SC 29401 by personally delivering a copy of it to Charleston County Clerk Of Court 100 Broad Street Charleston, SC 29401.

September 4, 2024  
Margie Brown  
Post Office Box 70813  
North Charleston, South Carolina 29412

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By Debra Ennis  
DEPUTY CLERK

Margie Brown

**NOTICE OF APPEAL THE COURT OF GENERAL SESSIONS**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals []

APPEAL FROM CHARLESTON COUNTY

Deadra L. Jefferson Court Judge

Case No. 2022A1010202600

2024 AUG - 9 AM 10:40  
FILED  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY MSS

The State of Carolina

V

Margie Brown

Respondent,

Appellant.

**NOTICE OF APPEAL**

Margie Brown Appeals the Order to withdraw the Speedy Trial Motion Granted by Judge Jefferson on July 22/2024 the Defendant received the order on Aug 5, 2024.

Margie Brown  
PO BOX 70813 North Charleston, SC 29415  
Brown.margie@aol.com  
650-716-9010

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.  
By Paule Enrie  
DEPUTY CLERK

VS

MARGIE BROWN

FILED  
2024 AUG - 9 AM 10: 40  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

The order was signed on July 31/2024. The order was not docketed in the system until August 5/2024. Charleston County Clerk of Court will be closed on August 7/2024 and August 8/2024. Due to Tropical storm Debbie. The Defendant Margie Brown is unable to serve a copy if the Appeal due to the fact the Courts are closed.

#1. The Defendant Margie Brown is appealing the order by Judge Jefferson of Charleston County Courts to withdraw the Speedy Trial Motion. Judge Jefferson order states that the Defendant advise the Court at the time if the Hearing she wanted to withdraw the Motion. The Defendant attended the Motion to Relive Counsel the Hearing on July 22/2024. The Defendant never asked, or stated she wanted the Motion withdrawn. During the Hearing Judge Jefferson asked Attorney Kevin Hales about the Speedy Trail Motion filed on March 22/2024. Mr. Hales acknowledged the Motion, Judge Jefferson said she was withdrawing the Motion. The Defendant stated that she was not in agreement with withdrawing the Motion. The Defendant made the demand fora Speedy Trial on May 18/2022. Judge Jefferson said she was withdrawing Motion because the Defendant Margie Brown. Was not in Jail. Judge Jefferson stated the Defendant Margie Brown had to be in Jail for Speedy Trial. The Defendant stated she was not in agreement with withdrawing the Motion. The Defendant stated the Sixth Amendment stated that a person could be out on bond while awaiting a Speedy Trial. Judge Jefferson said that was incorrect. The Defendant informed the Judge that the Solicitor made false Declaration to the Grand Jury Judge Jefferson said that was incorrect and was not the grounds for a Speedy Trial Violation.

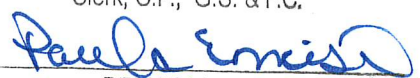
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JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.  
By Paula Emira  
DEPUTY CLERK

#2. The Defendant informed Judge Jefferson that she was denied her Second Appearance. Judge Jefferson stated that the Defendant should've received a Second Appearance, Judge Jefferson Asked Attorney Kevin Hales about the Second Appearance. Kevin Hales agreed the Defendant should have received a Second Appearance. Judge Jefferson said that Defendant didn't receive a Second Appearance because the Charleston County courts were not having them due to COVID-19. Judge Jefferson didn't quote a South Carolina Supreme Court Executive order stating that fact. During the Hearing Judge Jefferson continued to refer to the Defendants case in the year 2023. Attorney Kevin Hales never Objected or clarified that the Defendant case originated in May 2022. The Defendant had to inform the Judge of that fact.

#3. Judge Jefferson asked Solicitor Liane Kozik if the Defendant case was on the Docket for Trial. The Solicitor said no. Judge Jefferson asked if the State would except a lesser charge Solicitor said no. The state is negligent. The State didn't request the video footage of the alleged incident. Judge Jefferson asked if the State had any witnesses. The Solicitor said yes, Judge Jefferson asked how many the Solicitor said two or three. The Defendant stated that she was not aware of these alleged witness. That Attorney Kevin Hales never informed her of these witnesses. Judge Jefferson stated the Defendant should find that information in the Motion of Discovery. The Defendant said she did. There was only one witness, an African male, there was no phone number or address listed in the Motion of Discovery. The Defendant stated the State had no evidence and witness stated in the Motion of Discovery. The alleged victim was in possession of the alleged weapon.

#.4 The Defendant filed a Amended Motion to Relive Counsel on September 29/2024 on the grounds of Deprivation of Rights negligence, abuse, prejudice Conspiracy , Conspiracy to Interfere with Civil Rights and Concealment of evidence. Deformation 28.USC.4102 42 US 2983,42 7S.2985#342.US.1986.SC Criminal Rule#109(C)#1SC Criminal Rule#112,SC Criminal Rule 130(A)(C) SC Criminal Rule#122(A) 122,18 US.1623Section 26-9-300. Attorney Kevin Hales is a racist. The Defendant addressed that Charleston County Detention Center Bound Court

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Clerk, C.P., G.S. & F.C.

By   
DEPUTY CLERK

Employee Conspired to conceal the Defendants request for a Preliminary Hearing. The Defendant signed the document after Bound Court on May 18/2022. As is procedure the Defendant gave, Charleston County Detention Center Bond Court Employees the documents. The Defendant made the demand for a Speedy Trial and Preliminary Hearing on May 18/2024 after Bond Court. On the Kiosk in the Female dorm. The Defendant requested a Preliminary Hearing when she applied for a Public Defender. The Defendant never received a Court date for the Preliminary Hearing. Charleston Detention Center had no record of the Defendant request for a Preliminary Hearing. Charleston County Magistrate Court has no record of the request of the Preliminary Hearing. The Defendant addressed the fact that her case was never put on track(a)(b)(c) as is procedure with the State and General Sessions Court. The Defendant addressed the fact that she never received her Second Appearance. The Second Appearance should have been six months after the arrest date in September of 2022. The Defendant addressed the fact that the Clerk of Court Docket Sheet doesn't reflect Attorney Kevin Hales excusing the Defendant for the Second Appearance the Docket Sheet only reflects the first Appearance. Kevin Hales never notified the Defendant of the Second Appearance, Kevin Hales never asked the Defendant if she wanted to be excused. Kevin Hales never consulted with the Defendant asking if she wanted to Plea to a lesser charge or enter a guilty Plea. The Defendant was never notified of the Second Appearance by the State.

#5. On or around July 31/2023 the Defendant called Mr. Hales asking about the status of her case. Mr. Hales said there was no court date. The Defendant asked about pleading to a lesser charge. Mr. Hales said he would get back with the defendant. The Defendant asked if she could visit and discuss her options in person. Mr. Hales said yes. On or around August 3/2023 the Defendant had an in person meeting with Attorney Hales. Mr. Hales said the Solicitor wouldn't accept a lesser charge , the Defendant asked to see the body cam footage Mr. Hales blew it off as if it was of no importance. He said the video wouldn't play on his computer. Mr. Hales stated the Defendant needed not to worry the alleged victim had minor bruises on her left arm. Attorney Hales Stated in the Motion of the Discovery. The State had one witnesses an African male, Mr. Hales stated the witness said the alleged victim was in possession of the weapon.

#.6 The Defendant inquired about Charleston County Detention Center Employees Concealing her Preliminary Hearing documents and being

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Clerk, C.P., G.S. & F.C.

By   
DEPUTY CLERK

deprived of her Preliminary Hearing. Mr. Hales blew it off as if it was of no importance. The Defendant stated that she wanted to take her case to trial. The Defendant asked about her request for Speedy Trial, that she filed on May 18, 2022 after bond Court on the Kiosk in the female dorm in Charleston County Detention Center. Mr. Hales said the Defendant didn't qualify for a Speedy Trial because she wasn't in jail. Attorney Hales stated the Defendant Margie Brown would have to be in jail to get a Speedy Trial.

#7. After meeting with Mr. Hales in August 2023. The Defendant filed complaints to Lead Public Defender, and the Deputy Public Defender by emails, and phone calls about Attorney Kevin Hales ethics. Ted Smith returned the Defendant phone call, the Defendant explained what happened, the Defendant stated that she was not able to see or hear the body cam evidence, the Defendant explained that she sent emails and left voicemail asking for copies of the Motion of Discovery Mr. Hales wasn't returning phone calls or emails. Ted Smith said Give Mr. Hales a few days or so to see if he would reply to the phone calls or email. If that didn't work Mr. Smith suggested the Defendant file Motion to Relieve Mr. Hales as her Attorney.

#8. Mr. Hales never replied to the Defendant's request for copies of Motion of Discovery. Or documentation stating the State wouldn't accept a lesser charge. The Defendant also emailed asking for any and all documentation of her Second Appearance. Mr. Hales never replied. On or around September 11, 2024 the Plaintiff had an in person meeting with Deputy Ted Smith. The Defendant stated that the Solicitor Cannon filed the Indictment on August 8/29/2024 a year after the Defendant arrest. Not within the 90 day time frame. South Carolina Criminal Law 109(c)#1 states the States within 90 days of the arrest warrant from the Clerk of Court. The State shall take action#1 prepari g an Indictment. South Carolina Criminal Law #D The Solicitor may petition the Chief Judge for an extension of time. Solicitor Cannon didn't file for an extension of time as is pursuant The South Carolina Criminal Law (D).

#9. Ted Smith said there was no time frame for the Solicitor to file an Indictment, the Solicitor could file an Indictment at any time. The Defendant

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Clerk, C.P., G.S. & F.C.

By   
DEPUTY CLERK

asked about a Speedy Trial. Ted Smith said the Defendant had to be in jail to get a Speedy Trial. The Defendant addressed that Ted Smith couldn't provide the Defendant, with any Federal Law or Federal Code, or SC State Law or Code of the alleged statements. Ted Smith couldn't provide the Defendant with any case log of the alleged statement. Attorney Kevin Hales couldn't provide the Defendant with any Federal Law Code or SC State Law Code if the alleged statement. That the Defendant had to be in jail for a Speedy Trial.

#10. At all times relevant The Defendant was unable to find suitable employment due to the pending charge on her record. On Dec 19/2024 after exhausting all administrative avenues. A letter to the Judge, Complaints to the Lead Public Defender, Complaints to the Deputy Public Defender. The Defendant took Attorney Hales advice and turned herself into Charleston County Detention Center. On or around Dec 20/2023 the Defendant requested a Speedy Trail. On Jan 16/ Mr. Hales visited the Defendant he refused to file the Motion for a Speedy Trail. The Defendant expressed that she couldn't find suitable employment due to the pending charge on her record. The Defendant explained that was evicted and homeless. Mr. Hales Stated well now that your here I can file the Motion. Not because it was his job. Mr. Hales stated the Solicitor wouldn't accept a plea of a lesser charge. The Defendant asked Mr. Hales when was the last time he spoke with the Solicitor, he stated some time ago. The Defendant explained that the Solicitor made false Declaration to the Grand Jury. The Solicitor led the Grand Jury to believe the alleged victim was touched no consensually. Nonconsensual touching Nonconsensual consist of touching of the private parts. The breast, buttocks, vagina underneath the clothing or on above. The North Charleston Police report stated the alleged victim had light bruises on ger left arm. The Police report doesn't state the alleged victim was sexual touched or assaulted. Assault in the 2 Degree consist of substantial injuries broken bones, a concussion, an overnight stay in the Hospital, or a length stay in the hospital. Assault in the 1st Degree consist of minor cuts and bruises, and a visit to the ER The alleged victim had minor bruises on her left arm, and a visit to the ER. The Solicitor led the Grand Jury to believe the Defendant Margie Brown was sexual deviant. Mr. Hales still refused to file a Motion to Dismiss for a Speedy Trial Violation.

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JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By Paula Emiso  
DEPUTY CLERK

#11. The Defendant was released on or around Jan 21/2024. The Defendant met with Mr. Hales in person on or around Jan 26/2024. Mr. Hales stated that Solicitor Cannon viewed the alleged victim medical records and the State would except a lesser plea. However the decision was not up to The State. The alleged victim had to make the decisions. The Defendant excused herself from the meeting. The Defendant emailed Mr. Hales stating he was negligent the Solicitor had the Alleged victims medical records for 21 months. The State knew the alleged victim didn't have extensive injuries and Mr. Hales was negligent for not investigating the medical records as well. Mr. Hale so stated on or around August 3/2023 during the Defendant in person meeting the alleged victim had minor injuries on her left arm. Mr. Hales had the Motion of Discovery in his possession for 21 months. Mr. Hales is a racist and used malicious intent to deprive the Defendant of her Civil Rights. The Defendant stated that she wouldn't Plea to a lesser charge and to move forward with the Motion to Relieve Counsel. For two Months after the visit The Defendant continued to make the demand for a Motion Speedy Trial Violation. By email and phone calls. Mr. Hales continued to refuse. Mr. Hales didn't file the Motion for a Speedy Trial until March 22/2024. Twenty two months after the Plaintiff arrest.

FILED

2024 AUG -9 AM 10:40

JULIE J. ARMSTRONG  
CLERK OF COURT

BY \_\_\_\_\_

*Margi B...*

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By

*Paula...*  
DEPUTY CLERK

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

INDICTMENT

At a Court of General Sessions, convened August 2023, the Grand Jurors of Charleston County present upon their oath:

Assault & Battery, 2nd Degree

That in Charleston County, South Carolina, on or about May 16, 2022, the Defendant, Margie Brown, did commit an unlawful act of injury upon the victim, Descire Ravenscroft, or did offer or attempt to injure the victim, Descire Ravenscroft, with the present ability to do so and the act either: (1) resulted or could have resulted in moderate bodily injury to the victim; or (2) involved nonconsensual touching of the private parts of the victim either under or above clothing. This is in violation of Section 16-3-600(D)(1) 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.

  
SHARITA CANNON  
ASSISTANT SOLICITOR

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By Paula Emms  
DEPUTY CLERK

Received At or around 1:30 pm



h.h.t(A)

# ADDITIONAL NARRATIVE

Agency Name: NORTH CHARLESTON POLICE DEPARTMENT	ORI #: SC0100800	Report Date/Time: 05/16/2022	09:45	OCA #: 2022012121
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spoke to a witness, Kassim Alassane, on scene who advised that he heard a lot commotion outside of his room and when he opened his door witnessed Ms.Ravenscroft and Ms.Brown in an active disturbance. At that point in time Ms.Ravenscroft had taken possession of the bat and Mr.Alassane had escorted her to front office. Ms.Ravenscroft had the bat behind the front desk which I took into my custody and placed into evidence.

Ms.Ravenscroft had multiple clear marks on her arms and was treated on scene by EMS and transported to the hospital.  
Ms.Brown was promptly taken into custody and charged with Assault and Battery 2nd Degree. She was transported to Al Cannon Detention Center where she was lodged for the Assault and Battery 2nd Degree.

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By Paula Emme  
DEPUTY CLERK

Exhibit 10

# Request Report - Single Per Page

Printed: 1/25/2024 3:06:15PM

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Request Type:	LEGAL LIAISON	Request Subtype:	ATTORNEY
Assigned Group:	LEGAL LIAISON	Assigned User:	
Request Number:	45296	Status:	CLOSED
		Inmate Name:	MARGIE BROWN
Original Location:	MJAA1D L 1441	Current Location:	MJAA1D L 1433 01
Inmate Number:	0000380485	Inmate Secondary Number:	

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<u>Stamp</u>	<u>Action</u>	<u>Detail</u>	<u>User</u>
05/18/2022 03:02 pm	ORIGINAL REQUEST:	I need a public defender. To request the body cam footage off all officers at the incident. As well as the video footage on the 4th floor of the hotel	
05/21/2022 04:26 pm	CLOSED	CLOSED DUE TO ACCOUNT INACTIVE STATUS	

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By *Paula Emise*  
DEPUTY CLERK

Exhibit C  
Page 1 of 13

Request Type: LEGAL LIAISON  
Assigned Group: LEGAL LIAISON  
Request Number: 45297  
Status: CLOSED  
Inmate Name: MARGIE BROWN  
Current Location: MJ-AA1D L 1433 01  
Inmate Number: 0000380485  
Inmate Secondary Number:  
User

Stamp   Action   Detail

05/18/2022 03:04 pm  
ORIGINAL REQUEST:  
I am requesting a speedy trial  
05/21/2022 04:26 pm  
CLOSED  
CLOSED DUE TO ACCOUNT INACTIVE STATUS

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.  
By Paula [Signature]  
DEPUTY CLERK

Exhibit **D**  
Page 2 of 13

Request Type: LEGAL LIAISON Request Subtype: ATTORNEY  
Assigned Group: LEGAL LIAISON Assigned User:  
Request Number: 45298 Status: CLOSED Inmate Name: MARGIE BROWN  
Initial Location: MJAA1D L 1441 Current Location: MJAA1D L 1433 01  
Inmate Number: 0000380485 Inmate Secondary Number:

Stamp Action Detail

05/18/2022 03:06 pm

ORIGINAL REQUEST:

I am so requesting a preliminary hearing

05/21/2022 04:26 pm

CLOSED

CLOSED DUE TO ACCOUNT INACTIVE STATUS

User

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By *Paula Emery*  
DEPUTY CLERK

Exhibit D E

Request Type: LEGAL LIAISON Request Subtype: ATTORNEY  
Assigned Group: LEGAL LIAISON Assigned User:  
Request Number: 45408 Status: CLOSED Inmate Name: MARGIE BROWN  
Initial Location: MJ A A1D L 1441 Current Location: MJ-AA1D L 1433 01  
Inmate Number: 0000380485 Inmate Secondary Number:

<u>Stamp</u>	<u>Action</u>	<u>Detail</u>	<u>User</u>
05/19/2022 10:16 am	ORIGINAL REQUEST:	Can you please provide me with the name of the arresting officer and badge number	
05/21/2022 04:28 pm	CLOSED	CLOSED DUE TO ACCOUNT INACTIVE STATUS	

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.  
By *Paola Emme*  
DEPUTY CLERK

Exhibit F  
Page 4 of 13

Request Type: LEGAL LIAISON  
Assigned Group: LEGAL LIAISON  
Request Number: 147645  
Initial Location: MJ AA1D L 1411  
Inmate Number: 0000380485  
Request Subtype: SPEEDY TRIAL  
Assigned User:  
Inmate Name: MARGIE BROWN  
Current Location: MJ-AA1D L 1433 01  
Status: CLOSED  
Inmate Secondary Number:

Stamp   Action   Detail

12/20/2023 07:00 pm  
ORIGINAL REQUEST:  
I would like to request a speedy trial.  
12/21/2023 04:13 pm  
CLOSED:  
Your request was sent to your attorney.

User

9687

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.  
By Paula Gomez  
DEPUTY CLERK

Exhibit G

Request Type: LEGAL LIAISON Request Subtype: OTHER LEGAL  
 Assigned Group: LEGAL LIAISON Assigned User:  
 Request Number: 149424 Status: CLOSED Inmate Name: MARGIE BROWN  
 Jail Location: MJ AA1D L 1433 Current Location: MJ-AA1D L 1433 01  
 Request Date Number: 0000380485 Inmate Secondary Number:

amp Action Detail User

1/03/2024 10:27 am

ORIGINAL REQUEST:

I have been here for 2 weeks. Kevin Hales is STILL the attorney assigned to my case. I have not heard from him or received any mail. On 5/18/22 After bond court I submitted documents to CCDC employees for a Preliminary Hearing. I never received. I have been inquiring Mr. Hales as well as the public Defenders Office of these facts for more months. Nothing was don't about it. ON 12/27/23 I WAS SEXUAL THREATENED & HARASSED BY OFFICER HAMMERSHAM. I AM ASKING THAT THE VIDEO FOOTAGE BE PRESERVED. I WAS THREATENED THAT UNLESS I ENGAGE IN LESBIAN ACTIVITIES, I WILL NOT RECEIVE A BOND OR COURT DATE. CCDC The jail has in their systems 3 copies of legal request I made on 5/18/22 after bond court. #1 a Preliminary Hearing #2 a speedy trial #3 I requested the body cam footage of arresting officers. The video footage of the 4 floor of the hotel. The jail never to my request to the public defenders office. I made a FOI Request for this information in October 23. The Charleston County Sheriff's, stated they had no record of ANY request for in CCDC system. However they have 5 in the system.

1/05/2024 06:33 pm

INMATE RESPONSE:

CCDC Employees have had my legal request for over 48 hours. The legal request has not been forward to the Public Defenders Office, or my attorney. If they are not submitted, how is my attorney or the public Defenders Office be aware of my needs? CCDC employees have had 3 housing complaints in the system four 12 days #. 148041, 147955, I was unable to file a proper complaint to the correct department due to Staff negligence.. Housing Complaint# 147953. Was update on 1/3/24. It contains detailed information of Preliminary Hearing Documents request, made to CCDC. not Charleston County Public Defenders Office. Or Charleston County Clerk Of Court or My attorney. The Documents were given to a CCDC employees on 5/18/22 after bond court as Complaint# 147953. as details me being THREATENED & SEXUAL HARASSED BY OFFICER. on 12/27/24. The original complaint was filed on 12/22/23.

1/10/2024 11:21 am

INMATE RESPONSE:

Mrs Stephanie Singleton, its been a week and you have completely ignored my request. I enemy request to get my attorney. I also need the the address to the Office Of Disciplinary Counsel.

1/10/2024 03:00 pm

CLOSED:

Your request was sent to your Public Defender.

ATTEST: A TRUE COPY  
 JULIE J. ARMSTRONG (SEAL)  
 Clerk, C.P., G.S. & F.C.

By Paula Egan  
 DEPUTY CLERK

Exhibit H

# Request Report - Single Per Page

Printed: 1/25/2024 3:07:12PM

Request Type: RECORDS/RELEASING	Request Subtype: RECORDS/RELEASING	
Assigned Group: RECORDS	Assigned User:	
Request Number: 151049	Status: CLOSED	Inmate Name: MARGIE BROWN
Initial Location: MJ AA1D L 1433	Current Location: MJ-AA1D L 1433 01	
Inmate Number: 0000380485	Inmate Secondary Number:	

<u>Stamp</u>	<u>Action</u>	<u>Detail</u>	<u>User</u>
01/12/2024 04:16 pm	ORIGINAL REQUEST:	On 5/18/22. After bond court I completed documents, for a preliminary hearing. I gave the documents to CCDC staff. I need copies of those documents. My Public Defender, Charleston County Public Defenders Office, or Charleston County Clerk of Court. Does not have copies of those documents or records. CCDC staff was the last person to have possession of those documents.	
01/22/2024 02:39 pm	INACTIVITY NOTICE		
01/22/2024 08:14 pm	CLOSED	CLOSED DUE TO ACCOUNT INACTIVE STATUS	

**Total Requests:** 1

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By *Paula De E...*  
DEPUTY CLERK

Exhibit I

Request Type: PREA Request Subtype: PREA  
Assigned Group: PREA Assigned User:  
Request Number: 150196 Status: CLOSED Inmate Name: MARGIE BROWN  
Initial Location: MJ A A1D L 1433 Current Location: MJ-A A1D L 1433 01  
Inmate Number: 0000380485 Inmate Secondary Number:

Stamp Action Detail

01/08/2024 10:50 am  
ORIGINAL REQUEST:  
I was THREATENED & SEXUAL HARASSMENTED by officer Hammersham on 12/27/23 at or around 9 am. I was at the front desk, officer Hammersham was looking at my tablet. An inmate was in the shower. The inmate opened the shower curtain. She began to exhibit sexual behavior. Officer Hammersham didn't correct the inmate about her behavior. Officer Hammersham didn't ask the inmate to close the shower. I went back to my room. Officer Hammersham came to my room door, she THREATENED that if I didn't engage in Lesbian activities, I would not get a bond or a court date. The original was submitted to the wrong department. I see HOUSING complaint #147953

01/08/2024 03:09 pm  
INACTIVITY NOTICE

9672

01/17/2024 12:47 pm  
CLOSED:  
Your request was emailed to PREA and IA to look into.

9590

01/19/2024 07:39 am  
CLOSED:  
This is currently being investigated.

Total Requests: 3

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.  
By Paula Emery  
DEPUTY CLERK

Exhibit J



Request Type: LEGAL LIAISON Request Subtype: LEGAL MATERIAL/COPIES  
Assigned Group: LEGAL LIAISON Assigned User:  
Request Number: 147646 Status: CLOSED Inmate Name: MARGIE BROWN  
Initial Location: MJ AA1D L 1411 Current Location: MJ-A A1D L 1433 01  
Inmate Number: 0000380485 Inmate Secondary Number:

Stamp Action Detail

User

12/20/2023 07:02 pm

ORIGINAL REQUEST:

I would like to request a copy of the motion of discovery that includes officers body cam footage and audio.

12/21/2023 04:46 pm

9687

CLOSED:

Your request was sent to your Public Defender.

01/08/2024 10:51 am

11190

CLOSED:

Closing, answered on 12/21/2023

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By

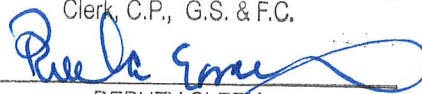
  
DEPUTY CLERK

Exhibit L  
Page 6 of 13

Request Type: LEGAL LIAISON Request Subtype: LEGAL MATERIAL/COPIES  
Assigned Group: LEGAL LIAISON Assigned User:  
Request Number: 147713 Status: CLOSED Inmate Name: MARGIE BROWN  
Initial Location: MJ AA1D L 1411 Current Location: MJ-AA1D L 1433 01  
Inmate Number: 0000380485 Inmate Secondary Number:

Stamp Action Detail User

12/21/2023 09:05 am

ORIGINAL REQUEST:

I would like to request any and all documents. Of the preliminary hearing. That was signed and submitted to Charleston County Jail. After my bond hearing on May 17/2022.

12/21/2023 11:25 am

9672

CLOSED:

you would have to get this information from your lawyer or write the courts.

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By

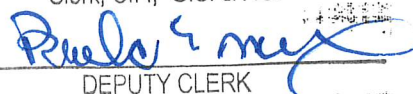
  
DEPUTY CLERK

Exhibit M

Email sent Lead Public Defender Camron Blazer  
AOL/Sent

Margie Brown <brown.margie@aol.com>

To: Margie Brown

Fri, Sep 29 at 12:59 PM

Sent from AOL on Android

— Forwarded Message —

From: "Margie Brown" <brown.margie@aol.com>

To: "Margie Brown" <brown.margie@aol.com>

Sent: Fri, Sep 29, 2023 at 12:56 PM

Subject: Lead Public Defender

I emailed you in regards to attorney Kevin Hales. In Aug 2023 My email or phone call was never returned. I spoke with Ted Smith, on 9/29/23 who couldn't show me or give any SC state code stating me or my attorney need not attend the second appearance. EMAIL SENT TO KEVIN HALES

Good afternoon. I need a copy of the indictment that was filed by the state on 8/29/23. The Solicitor office will not give me a copy. I also need the date, and any and all documents. Of the second appearance. That allegedly you and I were excused off attending because.

According to Ted Smith from the Public Defenders office on 9/29/23. Even, if I had changed my mind to enter a guilty plea. You or I didn't need to attend the second appearance. I was never contacted by you or the State of South Carolina, in 243 regards to a second appearance

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)

Clerk, C.P., G.S. & F.C.

By

Paula Eom  
DEPUTY CLERK

Exhibit

N

**Margie Brown**

**From:** brown.margie@aol.com

**To:** kghales55@gmail.com

Fri, Jan 26 at 4:14 PM

Mr. Hales, per our conversation our today. The Solicitor had access to the alleged victim medical records for 21 months. It is uncertain to me as to why, allegedly you had never seen the alleged victim medical records until today. The Solicitor was completely aware that the alleged victim, didn't sustain moderate injuries. On Aug 29/23 when the Solicitor filed the indictment, she made false declaration to the Grand alleging that victim injuries was extensive. The Solicitor office was responsible for sending me notice of the Second Appearance, that I never received. I have decided, not to plea to Assault 1 degree. You can move forward with contacting Jude Jefferson, for the Motion for relief you as conceal.

On Thu, Feb 8, 2024 at 7:17 PM, Margie Brown

<brown.margie@aol.com> wrote:

Good evening. is there any update with Judge Jefferson scheduling the Motion?

— Forwarded Message —

**From:** "Margie Brown" <brown.margie@aol.com>

**To:** "Kevin Hales" <kghales55@gmail.com>

**Sent:** Fri, Feb 23, 2024 at 12:48 PM

**Subject:** Fw:

Good afternoon. Just following up to, see if you need to send follow up email on Tuesday?

----- Forwarded Message -----

**From:** "kghales55@gmail.com" <kghales55@gmail.com>

**To:** 'Margie Brown' <brown.margie@aol.com>

**Sent:** Friday, February 16, 2024 at 03:33:06 PM EST

**Subject:** RE:

I have emailed the Clerk and Judge Jefferson's assistant and I am waiting on a response. If I don't hear by Tuesday, I will send a follow up email.

Kevin

**From:** Margie Brown <brown.margie@aol.com>

**Sent:** Thursday, February 15, 2024 7:57 PM

**To:** Kevin Hales <kghales55@gmail.com>

**Subject:**

Good evening. It's been 3 week since, I stated I would like to move forward with the motion relive counsel. Have you heard anything from Judge Jefferson office?

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By   
DEPUTY CLERK

Exhibit D

To: "Kevin Hales" <kghales55@gmail.com>

Sent: Sat, Mar 16, 2024 at 7:39 PM

Subject: Fw: Re:

Good evening, Mr. Hales. March 22/2024 Will be 60 days. Since I stated that I would like to move forward with the motion. While we are waiting for the courts to schedule the motion. You are still legally my attorney. Can you please move forward with filing the motion to dismiss. On the grounds of a speedy trial violation, and the alleged victim not sustaining substantial injuries.

--- Forwarded Message ---

From: "Margie Brown" <brown.margie@aol.com>  
To: "Kevin Hales" <kghales55@gmail.com>

Sent: Wed, Mar 20, 2024 at 6:59 PM  
Subject: Motion Dismiss

Good afternoon. So that were on the same page. As per our phone conversation. I'm not interested in a consent order. I would like to move forward with the Motion to Dismiss. Can you please provide me with an estimated Date and time. That you will fill out the motion to Dismiss and E- File it to the courts.

--- Forwarded Message ---

From: "Margie Brown" <brown.margie@aol.com>  
To: "DJeffersonSC@sccourts.org" <DJeffersonSC@sccourts.org>  
Sent: Thu, Feb 29, 2024 at 9:25 AM  
Subject: Fw: Judge Jefferson Letter

----- Forwarded Message -----

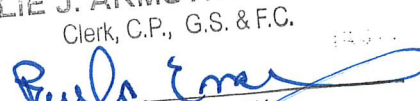
From: Margie Brown <brown.margie@aol.com>  
To: Margie Brown <brown.margie@aol.com>  
Sent: Thursday, February 29, 2024 at 09:06:36 AM EST  
Subject: Judge Jefferson Letter

Case NO: 2022A1010202600

Dear Judge Jefferson. My name is Margie Brown, I'm a client of Kevin Hales. On Jan 17/2024. I informed Mr. Hales that I was like to move forward with the motion to have him removed as my attorney. On Jan 26/2024, I reconfirmed my request. Mr. Hales stated that he's reached out to the office and was awaiting an answer. In the past 23 months that Mr. Hales has been my attorney he has refused to file a motion to dismiss, or any motion in re-gards to my case. It took

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By

  
DEPUTY CLERK

Exhibit

P

Request Type: LEGAL LIAISON Request Subtype: SPEEDY TRIAL  
Assigned Group: LEGAL LIAISON Assigned User:  
Request Number: 152055 Status: CLOSED Inmate Name: MARGIE BROWN  
Initial Location: MJ AA1D L 1433 Current Location: MJ-AA1D L 1433 01  
Inmate Number: 0000380485 Inmate Secondary Number:

User

Stamp Action Detail

01/19/2024 07:43 am

ORIGINAL REQUEST:

Mr. Hales I would like to proceed with a Motion to dismiss. On the grounds of a Speedy Trial Violation. I haven't heard from Sinkler bonding Company. My rights have been violated. Under the Sixth Amendment You continued to insist that in order for me to get a Speedy Trial. I would have to be in Jail. The Sixth Amendment states. The accused has a right to a Speedy Trial while on bond. You continue to mislead me you stated on 1/16/24 that a Speedy Trial is for Bail. I turned myself in on 12/20/23, the same day I requested a Speedy Trial. In 30 days you have yet to file a Motion to Dismiss. You continue to insist that The state will not accept a lesser charge. Yet you stated you haven't spoken with the state in 7 months. The alleged victim doesn't have any extensive injuries.

01/19/2024 10:30 am  
INMATE RESPONSE:


01/19/2024 10:45 am  
INMATE RESPONSE:

That fit crime. You stated you need my consent to get me a bond. I am uncertain as to why when the courts have not removed you from the case. Every time I contact the court or PD Office. I am told, I need to contact You. You have failed to file a Motion of the fact the my Due Process Deprivation of right have been violated by CCDC employees obstruction of Justice suppressing and concealing my Preliminary Hearing documents and my request for a Speedy Trial. On 1/16/24 you said you had still images of the Body cam footage. But you couldn't give them to me. Maybe you can mail them to me with copies of the True Bill/ Indictment. I wanted to see the video and hear it seeing as though I never have.

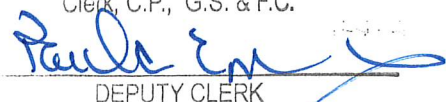
9687

01/19/2024 01:04 pm  
CLOSED:

Your request was sent to your attorney.

Exhibit 

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By   
DEPUTY CLERK

Sept/9/2023

STATE OF SOUTH CAROLINA  
VS  
MARGIE BROWN

NO: [REDACTED]

Der Presiding Judge. I Margie Brown. Being sound mind and body. I am asking the court that attorney Kevin Hales. Be removed from representing my case. Mr. Hales has failed to return emails and phone calls. Pertaining to my case. Mr. Hales, stated in July that the solicitor wouldn't accept a lesser charge. However he cannot provide any proof of this alleged fact. It's been 16 months, I still have not received a copy of the discovery I emailed and ask that send me a copy he has never replied. The witness identified the alleged victim as the person was with the weapon. I explained to Mr. Hales that I was a victim of homosexual harassment by the alleged victim. The people that work for the company are still harassing via cyber email. I asked the director to remove my email address from their mailing list. I asked to remove me I have asked Mr. Hales to take my case to trail I sent a copy of the email to Mr. Hales, last week when the email was received. He never contacted them about the harassment, nor did he contact me.

FILED  
2023 SEP 12 AM 11:28  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY KNN

Margie Brown  
9-12-23

SWORN to Before me this 12  
day of September 2023  
Madeline Smith  
NOTARY PUBLIC FOR SOUTH CAROLINA  
My Commission Expires 10/16/23

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

Exhibit R

By [Signature]  
DEPUTY CLERK

Amended Motion R

FILED

State Of South Carolina

2023 SEP 29 PM 4:00

VS

Margie Brown

JULIE J. ARMSTRONG  
CLERK OF COURT

BY: all

CN: 2022A1010202600

To the presiding Judge. I Margie Brown. Recently filed a letter, to remove Kevin Hales as my attorney. For negligence. However I am still being abused by Charleston County Public Defenders office and the system. On May 17/2022 after my bond hearing, I completed documents for a preliminary hearing and gave them to Charleston County Sheriffs officers. I also requested a preliminary hearing, when I applied for Public Defender. I never received notification of the hearing. There's no record, of the request with the Charleston County Jail or the Charleston County clerk of court

In Aug of 2023, I called and emailed the lead attorney Camron Blazer. My email and phone call was not returned. I reported that I visited Mr. Hales, office on 8/8/2023. Mr. stated that had no idea when I would go to court I informed Mr. Hales of my request for a preliminary hearing he brushed it off as if it was of no importance, and said it was not needed. Mr. Hales couldn't inform me if my case was on 180-day track, or a 365-day track. Mr. Hales couldn't provide me of any correspondence, or date of an alleged phone call with the State. Stating the State wouldn't except lesser plea. On that Visited Mr. Hales, couldn't provide me with a copy of the motion of discovery. Nor could I view the information in his office. He has refused to give me copies, of the information. What Mr. Hales read to me of the alleged, statements of the incident. Does not coincide with the State indictment statement.

I spoke with Ted Smith today on 9/29/23. He also mislead me, He stated that I wouldn't be able to get a copy of the indictment or the True Bill, only my attorney could. I went to the clerk of court and obtained a copy True Bill, and, and a copy of the indictment.

I Case #1099994 2007. The case was dismissed at the preliminary hearing on or around Nov 29/2007. The State filed an indictment on or around Feb 2007. All evidence of the indictment has been removed from the docket sheet

Mr. Smith could not refer to me as to any SC state law. Or Case law That states the Solicitor doesn't, have to comply with the 90 day indictment rule set by the court. He stated that there remedy, however if not provide a case law stating the alleged fact. The court text doesn't specify, if the 90 day rule applies to, a defendant's being in jail, or on bond.

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By Paola [Signature] Exhibit  
DEPUTY CLERK

S

There is no records on the docket sheet. Stating that the state asked for an extended time frame to file the indictment. The indictment was filed on 8/29/23 15 months after the arrest.

I never received a letter, of the Second Appearance. From the State of South Carolina. Nor was I was not contacted or informed by my attorney. To inquire if, I wanted to change my plea to a guilty plea. Mr. Hales knew or should have known to contact me. I verify my status on the case.

Pursuant to SCRPC Case Management 78(A) There is no record of the second appearance on the docket sheet with the clerk of court. I am downstairs, at the clerk of court as I am typing this letter. I was informed by the rep. The records, of the second appearance would be at the Solicitor office. Not with the clerk of court.

Mr. Smith stated on 9/29/23, that I nor my attorney need to attend the second appearance. Seeing as though I was represented by counsel. The state would simply check My case of the list of second appearance and move on to the next case. He stated that there was no Judge at the second appearance, just state representative. Therefore, denying me chance change my mind and to enter a guilty plea. Mr. Smith, couldn't, inform me, Of South Carolina State Code. That stated I Nor my attorney need to be presented. Mr. Smith couldn't inform as to what county office. I could get copies of the date this alleged court procedure took place.

I am unable to get copies of the alleged documents at the Solicitor office, because I have an attorney. Who does not return phone calls or emails.

FILED  
2023 SEP 29 PM 4:00  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

PO Box 708 B  
North Charleston SC  
29415

*Monique Brown*

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
Clerk, C.P., G.S. & F.C.

By *Paula [Signature]*  
DEPUTY CLERK

Exhibit T

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

IN THE COURT OF GENERAL SESSIONS  
FOR THE NINTH JUDICIAL CIRCUIT

FILED

ORDER ON MOTION FOR  
SPEEDY TRIAL

State of South Carolina, 2024 AUG -5 AM 9:35

Arrest Warrant #(s): 2022A1010202600

JULIE J. ARMSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

vs.

Margie Brown,

Defendant.

THIS MATTER came before the Court on July 22, 2024, for the purpose of  Setting  
 Reducing  Revoking  Modifying  Reviewing  Reinstating bond  Speedy Trial Motion.

The Defendant  was  was not present. The following attorney appeared on behalf of the  
Defendant: Kevin G. Hales, Esq. The State was represented by Liane D. Kozik, Esq. of the Solicitor's  
Office.

The Defendant is charged with the following offense(s): Assault and Battery, Second Degree

After hearing from the Defendant and the State, the Court finds it appropriate, and it is therefore  
**ORDERED, ADJUDGED, AND DECREED** that:

\_\_\_\_\_ Bond is  Denied  Waived at this time with leave for defense counsel to file a written motion  
for bond.

Motion for bond  Reduction  Revocation  Modification  Speedy Trial is  
 Withdrawn  Granted at this time.

\_\_\_\_\_ A Personal Recognizance Bond in the amount of \$ \_\_\_\_\_ is set at this time.

\_\_\_\_\_ A Surety Bond in the amount of \$ \_\_\_\_\_ is set at this time; and the  
Defendant  is  is not allowed to post 10%.

\_\_\_\_\_ Bond is  Reduced  Modified from \$ \_\_\_\_\_ to \$ \_\_\_\_\_  
 does  does not include other pending charges, and Defendant  is  is not allowed to  
post 10%. It is further

**ORDERED ADJUDGED, AND DECREED**, at the time of the hearing the Defendant advised  
the Court that she wishes to withdraw her Motion for Speedy Trial filed March 22, 2024. The  
Motion for Speedy Trial filed March 22, 2024 is hereby Withdrawn.

**AND IT IS SO ORDERED!**

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (GENERAL SESSIONS)  
Clerk, C.P., G.S. & F.C. 9<sup>TH</sup> JUDICIAL CIRCUIT

*sk Jeff* 2128

Charleston, South Carolina  
DATE: 7.31.24

By *Paula Ennis*  
DEPUTY CLERK