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Jan 27 2025

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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On Petition for Writ of Certiorari from  
Allendale County  
Honorable Perry M. Buckner, IV, Trial Judge  
Honorable Robert J. Bonds, PCR Judge

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Appellate Case No: 2024-001082

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LAPARIS FLOWERS,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

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**SUPPLEMENTAL APPENDIX**

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ATTORNEYS FOR RESPONDENT

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### MIRANDA RIGHTS

PLACE: Altamaha PD DATE: 12/07/14 TIME: 1745

BEFORE WE ASK YOU QUESTIONS, YOU MUST UNDERSTAND YOUR RIGHTS.

LF

You have the right to remain silent.

LF

Anything you say can be used in court as evidence against you.

LF

You are entitled to talk to a lawyer now and have him present now or at any time during questioning.

LF

If you cannot afford an attorney, one will be appointed for you without cost.

LF

If you decide to answer questions now, without a lawyer present, you will still have the right to stop answering at any time. You also have the right to stop answering at any time until you talk to a lawyer.

LF

Do you understand these rights?

LF

Do you wish to talk to us at this time?

### WAIVER OF RIGHTS

I have read this statement of my rights and I understand what my rights are. I am willing to talk now without a lawyer present. I understand and know what I am doing. No promises or threats have been made to me and no pressure or coercion of any kind has been used against me.

Signed: [Signature]

Witness: [Signature]

Witness: [Signature]



## VOLUNTARY STATEMENT

CASE # SI-14-0117

LEAD # \_\_\_\_\_

|                                                 |                                                                  |                                    |                                   |                      |
|-------------------------------------------------|------------------------------------------------------------------|------------------------------------|-----------------------------------|----------------------|
| LAST NAME<br><u>Flowers</u>                     | FIRST NAME<br><u>Laparis</u>                                     | MIDDLE NAME<br><u>Sh Mel</u>       | AGE<br><u>24</u>                  | D.O.B.<br>[REDACTED] |
| NICKNAME/AKA                                    | M <input checked="" type="checkbox"/> F <input type="checkbox"/> | SSN                                | STREET ADDRESS                    |                      |
| CITY<br>[REDACTED]                              | STATE<br>[REDACTED]                                              | ZIP                                | MAILING ADDRESS IF DIFFERENT      |                      |
| HOME TELEPHONE<br>[REDACTED]                    | WORK TELEPHONE<br><u>N/A</u>                                     | CELL TELEPHONE<br><u>N/A</u>       | OCCUPATION<br><u>Security</u>     |                      |
| EMPLOYER<br><u>Universal Protection Service</u> | EMPLOYER ADDRESS<br><u>162 Fairlane Drive</u>                    |                                    |                                   |                      |
| DRIVER'S LICENSE NUMBER/STATE                   | DATE AND TIME OF INTERVIEW<br><u>12/07/14 1800</u>               |                                    |                                   |                      |
| LOCATION OF INTERVIEW<br><u>Attendale PD</u>    |                                                                  |                                    |                                   |                      |
| INTERVIEWING AGENT<br><u>M. Brown</u>           | DEPARTMENT<br><u>SLED</u>                                        | INTERVIEWING AGENT<br><u>Manor</u> | DEPARTMENT<br><u>Attendale PD</u> |                      |

I, Laparis Flowers understand I do not have to say anything, and I volunteer the following information of my own free will, for whatever purposes it may serve. I can read and write and completed the 10th grade in school.

I Laparis Flowers went to the lobster house at 1100 o'clock/along with anton williams and Andre Lofton. We was at the lobster house just having a good time. Around 2:42 Me and anton williams left the club and went to Kendall Nix (girlfriend) aunte house by Iga a trailer park about 50 ft away. I gave the keys to my brother shawn's gill to hold because I had no transportation. Me and my (girlfriend) Kendall Nix left to go back to North Augusta, SC because my aunte Kim pulled us out the club earlier saying my baby was being cranky and Jennifer Bates (mother) stated that she was going to the hospital to see if he was okay. It takes about one hour and twenty minutes to get home - North Augusta, SC / I Laparis Flowers left the club before any type of confrontation or dispute went down. I Laparis Flowers dont know anything or have any idea about a shooting. All the people was cool with me. Russell Smart and Alexandre Gray was just in place earlier talking having a good time with me.

Q - S/lt BrownA - L. ParisQ - What vehicle did you drive to the Lobster House?A - 1999 Oldsmobile Alero - white LFQ - What conversation did you have with Kim Harley afterA - you left the Lobster House? Aunte Kim stated that shayvan williams  
lost got into a dispute with russell smart in Dec grey (Alexandre) about Tracy robert

I have read each page of this statement consisting of 2 page(s), each page of which bears my signature, and corrections, if any, bears my initials, and I certify that the facts contained herein are true and correct.

Date: 12-7-14 Time: 1830

Signature of person giving voluntary statement

WITNESS:

WITNESS

I certify that I have been given a copy of this statement consisting of 2 pages.

VOLUNTARY STATEMENT  
SUPPLEMENTALCASE # 31-14-0117

LEAD # \_\_\_\_\_

LaParis Flowers

Statement of, Continued

affair - and way I was I say we going home to North Augusta to check on my baby.

Q - Did you ever return to the Lobster House after you left?

A - I LaParis Flowers never return to the Lobster house after I left

Q - Did you shoot into a green Ford Crown Victoria at Pinewood Apartments?

A - I LaParis Flowers never shot or saw a green Ford Crown Victoria at Pinewood apartments

Q - Where did you go when you left Allendale?

A - North Augusta, SC [REDACTED] apt George town villas

LF

LF

LF

LF

Date: 12-7-14 Time: 1830

Person giving statement to place initials behind last word of statement as appears on last page.

Signature of person giving voluntary statement



## VOLUNTARY STATEMENT

CASE # 31-14-017

LEAD #

|                                                      |                                                             |                                               |                   |                      |
|------------------------------------------------------|-------------------------------------------------------------|-----------------------------------------------|-------------------|----------------------|
| LAST NAME<br>Nix                                     | FIRST NAME<br>Kendall                                       | MIDDLE NAME<br>Latrice                        | AGE<br>21         | D.O.B.<br>[REDACTED] |
| NICKNAME/AKA<br>Kendall                              | M<br><input type="checkbox"/> F<br><input type="checkbox"/> | [REDACTED]                                    |                   |                      |
| [REDACTED]                                           |                                                             | MAILING ADDRESS IF DIFFERENT<br>[REDACTED]    |                   |                      |
| HOME TELEPHONE<br>[REDACTED]                         | WORK TELEPHONE<br>[REDACTED]                                | OCCUPATION<br>[REDACTED]                      |                   |                      |
| EMPLOYER<br>[REDACTED]                               |                                                             | EMPLOYER ADDRESS<br>[REDACTED]                |                   |                      |
| DRIVER'S LICENSE NUMBER/STATE<br>[REDACTED]          |                                                             | DATE AND TIME OF INTERVIEW<br>12/17/14 5:49pm |                   |                      |
| LOCATION OF INTERVIEW<br>Allendale Police Department |                                                             |                                               |                   |                      |
| INTERVIEWING AGENT<br>Jeff Croft                     | DEPARTMENT<br>SLED                                          | INTERVIEWING AGENT<br>W. Tison                | DEPARTMENT<br>APO |                      |

I, Kendall Nix understand I do not have to say anything, and I volunteer the following information of my own free will, for whatever purposes it may serve. I can cannot read and write and completed the 12<sup>th</sup> grade in school.

I came to Allendale SC Friday afternoon. Came straight to my Aunt house who stay beside the hole in the wall to be with my cousin Ashley who was still working. My Aunt and I walk to the parade and after the parade we walk back to the house where my cousin Ashley had just put in the yard. My cousin and I then rode around for a while talking to family and friends. Came back to my Aunt house. I took a shower and got dress to head out to the lobster house. It was me my cousin Ashley and her sis sister who rode up there together. Got to the club which was the lobster house security check us and had to pay \$5.00 to get in. Got inside the club went straight to the restroom to use it. After using the restroom came back and went to the bar to get a drink. Started dancing and everything. I then went to the front to give the lady my keys/ license and money to hold until the club was over. Everyone started dancing talking then came in and the lady up front who

I have read each page of this statement consisting of 3 page(s), each page of which bears my signature and corrections, if any, bears my initials, and I certify that the facts contained herein are true and correct.

Date: 12/17/14

Time: 6:17pm

Signature of person giving voluntary statement

WITNESS:

WITNESS:

I certify that I have been given a copy of this statement consisting of 3 pages.

# VOLUNTARY STATEMENT SUPPLEMENTAL

CASE # 31-14-0117

LEAD #

K.N. Kendall Dix

Statement of, Continued

Who I gave my things to say La'Rois your  
 baby mama here - so he look at me and went  
 straight to the back to be with the boys and  
 (day) pool at the pool table. La'Rois "told him  
 when I came to find me and La'Rois and told us  
 to step outside. We step outside and she say  
 La'Rois your mother just text and call me  
 saying "broken down cranky" he want drink his  
 bottle of something because his heard asking  
 up if he continue to act crazy she would  
 take him to the hospital. We then went back  
 to the club and I told my friends what  
 was going on. Antonio who was with La'Rois, La'Rois  
 told him to come on. All of us left. I went and  
 got my keys and everything from the hotel I went  
 and told her - I was leaving. We left around 2:00  
 AM. I and my cousin said La'Rois was following  
 me to day today. He was suppose to go home  
 but he told La'Rois to drop him off to the house.  
 shows which is La'Rois brother - then all of a sudden  
 so for some money and to drive the car. Antonio  
 and his old lady said "oh sure". I then told  
 Antonio to bring my clothes and car charges  
 from out the house. He brought it and him and  
 La'Rois shook hands and he told us to call  
 when we made it. La'Rois and I then got  
 on the road to head back to North Carolina.  
 Once we got there, we got off at a place  
 and got in the bed and call to see if brother  
 was still acting cranky. His mother said he has  
 never step so we told her we would pick him  
 up in the morning. About a hour later people started  
 calling my phone and interrupting the call to

Date: 12/7/14 Time: 10:00 PM

Kendall Dix

Signature of person giving voluntary statement

Person giving statement to place initials behind  
 last word of statement as appears on last page.

Jeff Holt SLE D  
 Will [unclear] APD

VOLUNTARY STATEMENT  
SUPPLEMENTAL

CASE # 31-14-0117

LEAD #

Statement of, Continued

K.N. Saying a shooting and fighting happen. But everyone  
 was in the club changed drinking and  
 going themselves. I don't know anything about  
 a shooting or shooting cases we had went  
 the club and was I back in North Ridge. K.N.

K.N.

K.N.

K.N.

K.N.

Date: 12/17/14 Time: 6:15pm

 Person giving statement to place initials behind  
 last word of statement as appears on last page.

Signature of person giving voluntary statement

 9-11-14 SLE 17  
 William A. APO



# VOLUNTARY STATEMENT

CASE # 3114-017

LEAD # \_\_\_\_\_

|                                                    |                                                                                |                                                      |                          |                          |
|----------------------------------------------------|--------------------------------------------------------------------------------|------------------------------------------------------|--------------------------|--------------------------|
| LAST NAME<br><u>Nix</u>                            | FIRST NAME<br><u>Hendall</u>                                                   | MIDDLE NAME<br><u>Linnice</u>                        | AGE<br><u>67</u>         | DOB<br><u>[REDACTED]</u> |
| NICKNAME/AKA<br><u>[REDACTED]</u>                  | M <input type="checkbox"/> F <input type="checkbox"/> SEX<br><u>[REDACTED]</u> | STREET ADDRESS<br><u>[REDACTED]</u>                  |                          |                          |
| STATE<br><u>[REDACTED]</u>                         |                                                                                | MAILING ADDRESS IF DIFFERENT<br><u>[REDACTED]</u>    |                          |                          |
| HOME TELEPHONE<br><u>[REDACTED]</u>                | WORK TELEPHONE<br><u>[REDACTED]</u>                                            | OCCUPATION<br><u>[REDACTED]</u>                      |                          |                          |
| EMPLOYER<br><u>[REDACTED]</u>                      |                                                                                | EMPLOYER ADDRESS<br><u>[REDACTED]</u>                |                          |                          |
| DRIVER'S LICENSE NUMBER/STATE<br><u>[REDACTED]</u> |                                                                                | DATE AND TIME OF INTERVIEW<br><u>12/7/14 7:00 PM</u> |                          |                          |
| LOCATION OF INTERVIEW<br><u>[REDACTED]</u>         |                                                                                |                                                      |                          |                          |
| INTERVIEWING AGENT<br><u>Jeff Croft</u>            | DEPARTMENT<br><u>SLC 12</u>                                                    | INTERVIEWING AGENT<br><u>W. Tison</u>                | DEPARTMENT<br><u>APD</u> |                          |

I, Hendall Nix, understand I do not have to say anything, and I volunteer the following information of my own free will, for whatever purposes it may serve. I can cannot read and write and completed the 12th grade in school.

After leaving the club around 2:42 am. I went and drop my cousin and her step sister off. Stopped there and home later. Laptops all up and drop from car. He then gave me the keys and we went back to North Augusta. He then said he tired of everybody been off of something happen. Take care of his child. This is the correction to my first statement. H.

I have read each page of this statement consisting of 1 page(s), each page of which bears my signature, and corrections, if any, bears my initials, and I certify that the facts contained herein are true and correct.

Date: 12/7/14 Time: 7:12 PMSignature of person giving voluntary statement  
Hendall NixWITNESS: Jeff CroftWITNESS: William Tison

I certify that I have been given a copy of this statement consisting of 1 pages.



## VOLUNTARY STATEMENT

CASE # 14-0117  
LEAD # \_\_\_\_\_

|                                                                             |                     |                                                        |                                          |                               |                              |                      |
|-----------------------------------------------------------------------------|---------------------|--------------------------------------------------------|------------------------------------------|-------------------------------|------------------------------|----------------------|
| LAST NAME<br><u>HARLEY / WILLIAMS</u>                                       |                     | FIRST NAME<br><u>KIMBELLY</u>                          |                                          | MIDDLE NAME<br><u>SHANTAL</u> | AGE<br><u>38</u>             | D.O.B.<br>[REDACTED] |
| NICKNAME/AKA                                                                |                     | M<br><input type="checkbox"/>                          | F<br><input checked="" type="checkbox"/> | SSN<br>[REDACTED]             | STREET ADDRESS<br>[REDACTED] |                      |
| CITY<br>[REDACTED]                                                          | STATE<br>[REDACTED] | ZIP<br>[REDACTED]                                      | MAILING ADDRESS IF DIFFERENT             |                               |                              |                      |
| HOME TELEPHONE                                                              | WORK TELEPHONE      | CELL TELEPHONE                                         | OCCUPATION                               |                               |                              |                      |
| EMPLOYER                                                                    |                     | EMPLOYER ADDRESS                                       |                                          |                               |                              |                      |
| DRIVER'S LICENSE NUMBER/STATE                                               |                     | DATE AND TIME OF INTERVIEW<br><u>12/6/14 @ 9:47 AM</u> |                                          |                               |                              |                      |
| LOCATION OF INTERVIEW<br><u>ALBUQUERQUE POLICE DEPARTMENT (PARKING LOT)</u> |                     |                                                        |                                          |                               |                              |                      |
| INTERVIEWING AGENT<br><u>GHENT, C.L.</u>                                    |                     | DEPARTMENT<br><u>SLED</u>                              |                                          | INTERVIEWING AGENT            |                              | DEPARTMENT           |

I, KIMBELLY HARLEY WILLIAMS understand I do not have to say anything, and I volunteer the following information of my own free will, for whatever purposes it may serve. I can read and write and completed the 12th grade in school.

THIS IS THE STATEMENT OF KIMBELLY HARLEY WILLIAMS. I HAVE ASKED  
 LIEUTENANT GHENT TO WRITE THIS DOWN FOR ME IN MY OWN WORDS.  
~~JACOB~~ JACQUAVIAN WILLIAMS IS MY SON. HE GOES BY "TOOT". HIS  
 BIRTHDAY IS COMING UP [REDACTED] SO WE WERE ALL AT THE  
 LOBSTER HOUSE CLUB LAST NIGHT. ME, TOOT, MY BROTHER GUY  
 HARLEY, ULYSSE GRAHAM AND SOME OTHER PEOPLE. IT WAS PACKED.  
 MY NEAHEW LAPARIS "PAT PAT" ~~WAS~~ WAS IN THE CLUB, BUT  
 I THINK HE LEFT BEFORE THE ARGUMENT.  
 TOOT AND THIS BOY LAST NAME GUY BOTH MET WITH THE  
 SAME GIRL TRACY ROBERTS. THEY WERE ARGUING OUTSIDE  
 WHEN THE CLUB WAS ABOUT TO CLOSE. I HEARD PEOPLE  
 SAYING THEY GUY BOY HAD A GUN SO I CALLED 911  
 AND TOLD THEM SOMEONE WAS FIRED. THERE WAS NOT A SHOOTING  
 THEN, BUT I WANTED THE POLICE TO GET THERE FAST. POLICE  
~~SHOWED~~ SHOWED UP AND WE LEFT AND ALL WENT TO MY GRANDMA'S  
 HOUSE + MY BROTHER BATH. TOOT WAS WITH US. ALL NIGHT.  
 I GOT A CALL THIS MORNING FROM MY FRIEND TIBBY HARLEY  
 AND SHE SAID THAT PAT PAT (LAPARIS) WAS SHOOTING SOMEONE  
 IN PINEWOOD APARTMENTS. LORDELITA HARLEY CALLED ME AND SAID  
 THE SAME THING. PEOPLE ALSO TALK ABOUT IT ON FACEBOOK

I have read each page of this statement consisting of 1 page(s), each page of which bears my signature, and corrections, if any, bears my initials, and I certify that the facts contained herein are true and correct.

Date: 12/6/14 Time: 10:22 AM

Signature of person giving voluntary statement

WITNESS: LT. [REDACTED] - SLED WITNESS: \_\_\_\_\_

I certify that I have been given a copy of this statement consisting of 1 pages.

## SOUTH CAROLINA LAW ENFORCEMENT DIVISION

NIKKI R. HALEY  
Governor



MARK A. KEEL  
Chief

MEMORANDUM OF INTERVIEW

**TO:** File # 31-14-0117  
**FROM:** Special Agent Charles M. Brown  
**RE:** Interview with Jaqwavian Williams on December 6, 2014  
**COUNTY:** Allendale

---

**Name:** Jaqwavian Williams

**Address:** [REDACTED]

**Phone:** [REDACTED]

**DOB:** [REDACTED]

---

On December 6, 2014, Special Agent (S/A) Charles M. Brown and Detective Qutiqe Manor, Allendale Police Department, conducted an interview with Jaqwavian Williams (AKA "Toot") at the Allendale Police Department. He stated the following information during the interview: On December 5, 2014, he stayed home all day and then went to the Lobster House around 10:30 p.m. He stayed until sometime after 2:00 a.m. when the Lobster House closed. When he was walking out into the parking lot of the Lobster House, he saw his ex-girlfried, Tracy Roberts, and blew her a kiss. Roberts' boyfriend, "D" (later identified as Aldeandre Gray), saw him blow the kiss and confronted Roberts. Gray then made a statement like "If he wants to do something then



An Accredited Law Enforcement Agency

P.O. Box 21398 / Columbia, South Carolina 29221-1398 / (803) 737-9000 / Fax

LAPARIS FLOWERS V. STATE  
APPLICANT'S EXHIBIT  
4  
CASE NO. 2020-CP-03-00257

MOI of Jaqwavian Williams dated December 6, 2014  
File # 31-14-0117  
Page 2 of 2

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lets do it." Russell Smart walked up and started tugging at his waitstband. He assumed that Smart was letting him know that he had a gun, but he never actually saw Smart with a gun. After the verbal altercation, he saw Smart and Gray get into Smart's vehicle and leave the Lobster House. At some point during the altercation his mother, Kimberly Williams, called the police and told them that there were shots fired at the Lobster House, but there were not any shots fired. He got into the vehicle with his mother and went back to his grandmother's house. Once at his grandmother's house, he sent several text messages to Roberts indicating that he wanted Gray to come outside so that they could settle the argument (Agent's Note: Roberts lives on the same road as Williams' grandmother). Roberts told him that Gray was not at the house. Sometime later, Liz Rollins, security officer at the Lobster House, called and told him that Smart was shot and killed. He never left his grandmother's house after he got home from the Lobster House. He was not involved in any way with the death of Smart.