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JAN 27 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
Jerome CurryIN THE SOUTH CAROLINA COURT OF APPEALS
CASE NO: _____Motion To Amend Complaint Due To Newly Discovered
Evidence Discovered On Jan 16, 2025 / Motion To Amend
Pursuant to Court Rules

VS.

South Carolina Dept. of Corr.

STATEMENT OF FACTS

Now comes the Appellant with this above entitled petition prose without any access to law library, addresses for courts, or cases, docket numbers, due to (SCDC) staff destroying and throwing it all away in the trash done in bad faith based upon fraud upon court, conspiracy, unclean hands doctrine done in order to pervert justice within this proceeding and cases pending before this court making it impossible under these circumstances to present case properly. I certify that this statement is true and correct under penalty of perjury so help me God this true and correct. Being presented in good faith clean hands doctrine to ensure justice within this matter where justice is lacking and very much needed

STATEMENT OF FACTS

On Jan 16, 2025 I discovered after seeing mental health specialist that (SCDC) failed to place in system fact that I am serious mental health inmate and has been for years as well as being denied medications and treatment for PTSD, [REDACTED] Bipolar Disorder, Paranoid Schizophrenia, anti social disorder, denied since 10/30/21 see Federal District Court 1983 Civil Rights lawsuit pending on appeal in the United States Court of Appeals For the Fourth Circuit Case #24-7195 [0:23-03255-JOM]

STATEMENT OF FACTS

Furthermore all charges convicted of was in violation of (SCDC) policy then and now Appellant was incompetent being denied medications by staff and mental health wrongfully classified with illnesses reported further not treated at all declared not accountable for any actions committed since 2020 and again 2023, 2024, By South Carolina Dept of mental health along with PCR Judges judgments see PCR Case # 2022-CP-10-2017 further judgment entered on Dec 19, 2024 by the Honorable Judge Newman declared incompetent with order to be restore to [REDACTED] become competent again. Further due to wrongful mental health classification by SCDC staff as well as illnesses never [REDACTED] treated for left untreated by (SCDC) the used against Appellant to enforce wrongful judgments & mistreatment

STATEMENT OF FACTS

Therefore knowing these stated facts thus evidence and proof that the charges in every and all cases pending before this Honorable Court herein clearly shows fraud upon Court, conspiracy to deprive civil rights, to due process, fairness, equal protection of the Laws. It was further noted and discovered that I was never supposed to be found guilty then or now due to my mental illnesses and denial of Court order treatment by SCDC then blamed, assaulted, falsely and sham charges placed upon me then found guilty of all

STATEMENT OF FACTS

knowing that these charges were due to the denial of treatment by (SCDC) and later knowing this still finding me guilty of all and every charge stating I am not serious mentally ill or seriously suffering serious mental illnesses, Thus finally admitted and discovered on Jan 14, 2025 while at McCormick Corr Inst, in which I told every DHO officer at every hearing that I was allowed to go to further denial and violation of SCDC policy on disciplinary actions against seriously mental health inmates 14th Amendment to US Constitution due process equal protection and fair mail state/ Federal Const. As well as in violation of Wolff v. McDonnell US Supreme Court Due Process in Major Disciplinary hearing

CONCLUSION

Based upon these stated facts I move before this Honorable Court herein to place this Amendment and have it on docket for all charges pending Appeal due to lack of paper, legal supplies, and due to my poverty I move Court to accept this Amendment to be filed with all pending cases on Appeal with this Court against (SCDC) I have no case number due to SCDC staff destroying, throwing in trash. The constitution states no person shall be denied the right to life, liberty, or property without due process of law nor deny right to equal protection of the laws as all Judges and judicial officers have sworn an oath upon office to defend, enforce, uphold, honor, respect the constitution in which I invoke this Court to do so by vacating all void & unconstitutional Judges against (SCDC) Dept of corrections further convictions in violation of United States Supreme Court Case of *Walt v. McDannell* Due Process in major disciplinary hearings Judgment vacated all rights and goodtime restored without delay.

STATE OF SOUTH CAROLINA

Jerome Curry

VS.

South Carolina Dept of. Corr.

IN THE SOUTH CAROLINA COURT OF APPEALS
CASE NO: _____

AFFIDAVIT OF SERVICE BY MAIL

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SC Court of Appeals

AFFIDAVIT OF SERVICE BY MAIL

1. I am the entitled Appellant in this action pending before this Court herein moving pro se with this petition
2. I certify that I have served a copy of this petition on all parties on Jan 17, 2025
3. BY placing in the hands of correctional officers hands while in RHU unit cell #4 McCormick Corr Inst rec. Prison video cam as evidence

Respectfully Submitted BY /s/ Jerome Curry

South Carolina Court of Appeals

Jenny Abbott Withings, Clerk

Post office BOX 11629

Columbia, SC 29211

Office of General Counsel

Department of Corrections

Post office BOX 21787

Columbia, SC 29221-1787

South Carolina Court of Appeals

Jenny Abbott Mitchings, clerk

Post Office Box 11629

Columbia, SC 29211

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JAN 27 2025
SC Court of Appeals

Dated: Jan 17, 2025

Re: Jerome Curry v STATE OF SOUTH CAROLINA, SOUTH CAROLINA
Department of Corrections,

CASE NO: _____

Dear, clerk of Court;

Enclosed petition to amend complaint pending appeal before this Honorable Court
due to newly discovered evidence. I move Court to stamp, clock, and file this
petition as well as forward me a copy stamp clock and file for my records.
I further request that this Honorable provide me with copies of all pro se filings
in connection with all cases pending before this Court on appeal filed by me
Pro se along with all filings by the Dept of Corri Respondents along with
providing all case number for docket due to SCOC staff destroying all
legal documents and filings pro se by throwing in trash.

Thank you

Very

Truly

LSI Jerome Curry

Jerome Cury #253067 / RTH Cell #4

MC Cormick Corri Inst

386 Redemption Way

MC Cormick, SC 29899

ATLANTA GA RPDC 392

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