

RECEIVED

Mar 31 2025

SC Court of Appeals

FORM 1

NOTICE OF APPEAL IN A GENERAL SESSION CASE

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

Judge Roger M. Young

Case No. 2022-A-1010202600

Roger M. Young

Respondent,

FILED
2025 MAR 31 PM 4:51
JULIE J. ARHSTROM
CLERK OF COURT
RY _____

Margie Brown

Appellant

NOTICE OF APPEAL

Margie Brown appeals the order [judgment] of the Honorable Roger M. Young dated March 25/2025 Appellant got a copy of the written notice of entry of this order [judgment] on March 31, 2025.

Margie Brown

Post Office Box 20063 Charleston, South Carolina 29413

Other Counsel of Record:

Liane Dublinski Kozik

101 Meeting St Charleston, SC 29401

RECEIVED

Mar 31 2025

SC Court of Appeals

FORM 7 PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

Judge Roger M. Young

Case No. 2022-A-10102026000C

Roger M. Young

Respondent,

Margie Brown

Appellant

FILED
2025 MAR 31 PM 1:52
JULIE J. ARMSTRONG
CLERK OF COURT
BY _____

PROOF OF SERVICE

certify that I have served the Notice of Appeal on Judge Roger M. young and SC State Solicitors **Liane Dublinski Kozik** by depositing a copy of it in the United States Mail, postage prepaid, on March 31 15, 2000, addressed to Charleston County Clerk of Court 100 Broad ST Charleston, SC 29401. [by personally delivering a copy TO Charleston County Clerk Of Court Located at 100 Broad ST Charleston, SC 29401, 2000]. On March 31/2005 15, 2000

STATE

V

MARGIE BROWN

2022-A-1010202600

The Defendant seeking an appeal. On the grounds of Judge Roger Young dismissing the Defendants Faretta Motion on March 25/2025. The Defendant wasn't aware of the Hearing. The defendant never received notification of the hearing The defendant update her PO BOX address with the Courts on Aug 6/2024. The same. Day she resubmitted SC Appeal documents, and update her address with the Court of Appeals.

The Defendant is seeking the Faretta Motion on the grounds the State appointed Attorney never advocated the defendants case. The Defendant has been unemployed since Dec/2022. Two and half years The Defendant has not been able to get adequate employment because of the pending charge reflecting on her back ground. The Defendant cannot afford a paid attorney. In 20224 each attorney the Defendant contacted about the case stated it would be conflict of interest to represent the Defendant, because allegedly they donate to the alleged victims company.

The Defendant filed Motion to remove counsel in September 2023 on the grounds that the State appointed attorney never advocated for the Defendant. At all times relevant the State appointed attorney knew or should've have known. That the burden of proof rest with the State. The state has no evidence, the State has no witness. The police report state that a black African male state that the alleged victim was in possession of the weapon. The police report didn't include a phone number, email address or a room number the hotel The state nor the State appointed attorney never requested the video footage of the alleged incident. Or follow up with the witness.

At all times relevant during June 2022- July 2024 the State appointed attorney. Knew or should've known that on August 28/23. 380 days after the Defendant was arrested the State Solicitor Shrtia Cannon made false decorations, committed perjury and liable slander to the Grand Jury. Leading the Grand jury to believe the Defendant was sexual deviant. The State of SC has 90 days to file an indictment after the defendants

A all times relevant ,the State appointed attorney knew or should've known . That the alleged injuries of the alleged victim were substantial for the charge of assault in the Second Degree. Assault in the Second degree is defined by, gunshot wounds, broken bones concussion lengthy stay in the hospital. The police report clearly states that the alleged victim had light bruises on her left arm. The police report didn't state that victim was touched under or on top of her clothing.

STATE OF SOUTH CAROLINA

INDICTMENT

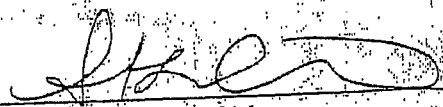
COUNTY OF CHARLESTON

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

Received AL or
around 1:30 pm

Exhibit

Request Type:	LEGAL LIAISON	Request Subtype:	ATTORNEY
Assigned Group:	LEGAL LIAISON	Assigned User:	
Request Number:	45297	Status:	CLOSED
		Inmate Name:	MARGIE BROWN
Initial Location:	MJ AA1D 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>
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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	

Exhibit 3

ADDITIONAL NARRATIVE

Agency Name: NORTH CHARLESTON POLICE DEPARTMENT	ORI #: SC0100800	Report Date/Time: 05/16/2022 09:45	OCA #: 2022012121
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Assault and Battery 2nd Degree

I 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.

Exhibit C

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

<u>Stamp</u>	<u>Action</u>	<u>Detail</u>	<u>User</u>
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01/03/2024 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 Incoming 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 THREATEND THAT UNLESS I ENGAGE IN LESBIAN ACTIVIES. I WILL NOT RECEIVE A BOND OR COURTY 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 trail# 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 hadvno record of ANY request for in CCDC system. However they have 5 in the system.

01/05/2024 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 ccomplains 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 upmdate on 1/3/24. It contains detailed information of Preliminary Hearing Documents request, made to CCDC. not Charleston CountyPublic Defersers Office. Or Charleston CCounty Clerk Of Court or My attorney. The Documents were given to a CCDC employess on 5/18/22 after bond courtAs Complaint# 147953 as details me being THREATEND & SEXUAL HARASSED BY OFFICER. on 12/27/24. The original complaint was filed on 12/22/23.

01/10/2024 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.

01/10/2024 03:00 pm
CLOSED: 9687

Your request was sent to your Public Defender.

Exhibit D

Request Type:	LEGAL LIAISON	Request Subtype:	OTHER LEGAL
Assigned Group:	LEGAL LIAISON	Assigned User:	
Request Number:	151187	Status:	CLOSED
Initial Location:	MJ A A1D L 1433	Inmate Name:	MARGIE BROWN
Inmate Number:	0000380485	Inmate Secondary Number:	
		Current Location:	MJ-A A1D L 1433 01

Stamp Action Detail

User

01/13/2024 07:36 pm

ORIGINAL REQUEST:

Mr Hales, I have been here 30 days. I need copies of the Motion of Discovery the includes the indictment. I was unable to bring in the copy I received on Dec 20/23. I am uncertain if you are aware that on 5/17/23 I was charged with A**ault & Battery Second Degree. The alleged victim, allegations and injurie. Doesn't fit SC Criminal Law for A**ault & Battery Second Degree. The charge. Of Moderate Bodily Injuries. The alleged viclrm, had no prolong loss of Conscloousness no temporary disfigurement, no loss of functions of members or organs or any dislocation. Moderate Bodily Injuries doesn't included a one lime treatment. Of cuts,bruises,scratches and injuries the do not require extensive medical care. Non consensual touching is of private parts, such as genital buttocs or female breast.

01/14/2024 05:43 pm

INMATE RESPONSE:

This information needs to be brought to the Solicitor attention. A**ault & Battery Second Degree (A) #2 Moderate #2 (D) Moderate, (B), Consensual touching.

01/14/2024 05:46 pm

INMATE RESPONSE:

Code 1976-16-3-600

01/16/2024 05:29 am

9687

CLOSED:

Your request was sent to your attorney,

Exhibit E

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 Slinkler 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 CDC 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 F

Request Report - Single Per Page

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

Request Type:	LEGAL LIAISON	Request Subtype:	ATTORNEY
Assigned Group:	LEGAL LIAISON	Assigned User:	
Request Number:	45296	Status:	CLOSED
		Inmate Name:	MARGIE BROWN
Initial Location:	MJ AA1D 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>
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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