

State of South Carolina
County of Laurens

Lakeem Olijuwon Smith, #318951
Applicant

v.

State of South Carolina
Respondent

In The Supreme Court
of South Carolina

CA No: 2012-CP-30-890
(Pro Se)

Guilty Plea Explanation
(Pursuant)

To White v. State RECEIVED

OCT 16 2013

This matter comes before this Honorable Court by way of an application for past-conviction relief (PCR) Filed November 8, 2012. wherein the Applicant raised three (3) grounds for relief. Herin, the Applicant would "state concisely, and in the same order, the facts which supported the grounds that he intended raised at the PCR hearing.

I.

The Applicant is presently confined in the South Carolina Department of Corrections pursuant to orders of commitment of the Laurens County Clerk of Court. The Applicant was indicted at the October Term of the Laurens County Grand Jury for two (2) counts of Kidnapping (2009-GS-30-1407; -1408), Burglary-First Degree (2009-GS-30-1409), Possession

of a weapon during the commission of a violent crime (2009-ES-30-1410), Grand Larceny (2009-ES-30-1411), and two counts of Armed Robbery (2009-ES-30-1412, -1413). The Applicant was represented by Scott Robinson, Esquire. On December 9, 2011, the Applicant pled guilty to all charges as indicted.

The Honorable Frank R. Addy, Jr. sentenced the Applicant, pursuant to a negotiated sentence, to confinement for (15) Fifteen years for each Kidnapping charge, Fifteen (15) years for Burglary, 1st degree, Five (5) years for Grand Larceny, and Fifteen (15) years for each Armed Robbery charge. All sentences run concurrently. The Applicant did not appeal his conviction and sentence.

As the Respondent has rightfully reserved the right to amend their Return upon receipt of any relevant materials, this Amended Brief is prepared for that purpose.

IV

In his current Application, the Applicant alleges that he is being held in custody unlawfully for the following reasons:

1. "Prosecutorial Misconduct"
2. "Ineffective Assistance of Trial (Plea) Counsel"
3. Due Process Violation - (Brady Materials)

As Respondent, again, rightfully asserts... "All amendments should be made well in advance of an evidentiary hearing by counsel of record" Rule 11, SCRPC.

The Applicant respectfully submits, that - in the particular instant case - there are extenuating circumstances involved that made the "well in advance" stipulation(s) (at this point) almost utterly unattainable, unless, as the Applicant will strongly urge "his counsel" to pursue, a continuance may be obtained.

These circumstances are denoted as follows:

1. First and Foremost, Applicant is not a "seasoned practitioner" in the legal arena. Nor, for that matter, even a "piece meal" one. And, as such...
2. Was, initially, "heavily relying" upon "PER defense counsel" to devise the means by which any post-conviction relief might be acquired. However....
3. Regrettably, PER counsel is of the mind that there is no "truly relevant issue(s)" to warrant PER consideration. Thus...
4. The Applicant has been compelled to rely upon "other sources" in both creating and establishing a "suitable appeal foundation, for counsel to, follow-through, upon.
5. Secondly, with such a "rapid response" establishing a hearing date, even the assistance the Applicant has been able to acquire will I would make it impossible (still) to

both "perfect and present" this document to both defense counsel and the Respondent, as well as, the Honorable Court, without infringement upon Rule 11. Thus, again, a plea for continuance! Nonetheless! ...!

III & IV

For the purposes of responding to the Return of the Respondent and clarification of his allegations, the Applicant submits:

IV Prosecutorial Misconduct - selective Prosecution Error

"To Find misconduct a two-pronged test must be met:

1. The remarks must be improper.
2. The remarks must prejudicially affect the substantial rights of the defendant."

U.S. v. Eyster, 948 F.2d 1196 (11th Cir. 1991).

"Opening arguments, like closing, should not refer to matters that are not to be presented as evidence."

U.S. v. Taron-Palma, 997 F.2d 525 (9th Cir. 1993).

"(c)ounsel are not free to go outside the evidence in arguments to the jury."

U.S. v. Hawkins, 595 F.2d 751 (D.C. Cir. 1978).

The Applicant contends that, while this court appear-

once was a plea hearing, the solicitor should have still been bound by certain "ethical and constitutional restraints" in both his opening recessitations, as well as, closing.

Particularly, where the plea arrangements (agreements) were concerned. And how they - the dispositions - were assessed.

Namely:

a.) "He also admits going into the residence. He admits to taking property from the residence. He admits to actually coming himself while in the residence. States that he grabbed one of the guns as I recall."

Transcript - (Plea hearing); pg. 10, lines 17-20.

The Applicant contends that, yes, his transcribed statement attests to his admission of the three above statements.

The Applicant further contends, however, that - with specificity - his statement:

- 1.) Does not make any declaration of "his holding" anyone at gunpoint!
- 2.) Does state... "one told me to grab the shotgun. I put it on my shoulder!"

Page 2 of 2 - Applicant's Statement.

b.) "We have statements from all but one of the co-defendants, all basically implicating each other."

Transcript - (Plea hearing); pg. 10, lines 21-23.

1. Solicitor recessitations! 5 of 16

The Applicant contends, again, that "basically implicating" does not note, with specificity, a "defined statement of facts" denoting "who alleges that who did what." Only that, from a "decidedly random declaration" from the solicitor, substantiates the Plea Judge's drawing "damning specific conclusions of guilt."

"Exclusion of evidence describing 'specific circumstances of teenage murder suspect's confession was in error."

Crane v. Sowders, 889 F.2d 715 (6th Cir. 1989).

The Applicant contends that, while this is not a murder case, the dynamics remain the same! In his statement, the Applicant "specifically points out" who, he alleges, did what. And that, rather obviously, if whom the the solicitor were to, specifically identify, as an accuser, of his (Applicant) performing certain actions were false, a challenge would have been immediately forthcoming.

Particularly, again, where the solicitor states:

c.) "However, as I noted, he does have a juvenile record. From where he'd been in the same house, and burglarized it before."

Transcript - (Plea hearing); pg. 10-11, lines 24-1. And....

"...that's the reason why we're sticking to a fifteen year violent sentence."

Transcript - (Plea hearing); pg. 11, lines 5-6.

The Applicant contends that, it seems that the solicitor

would have, and did, place the Applicant's "presence" (a second time) in the residence as a "higher criteria", worthy of a "higher sentence consideration" than those of his co-defendants. In contrast to ... say ... looking down the barrel of a weapon, from a matter of inches, thinking that your life could immediately be coming to an end!

By the victim-witness testimony, the Applicant has been a "materialistial hindrance" to their lives, but never a "physically fatal" intended type of individual, to them! He is admittedly guilty of possession of a weapon, not the presentation of a weapon to commit violence on anyone!

Transcript - (Plea hearing); pg. 26, lines 1-14.

"Due Process bars a prosecutor from making knowing use of false evidence."

U.S. v. Boothe, 994 F.2d 63 (2nd Cir. 1993).

The solicitor's misstatements - though presented - assumedly - under the "hands of one, hands of all theory" should not have precluded the use of definitive explanations of the facts with absolute specificities!

"A prosecutor should not portray as facts, matters that are not in evidence, and he should not mistake facts, or the law."

U.S. v. Ollivert, 378 F.3d 412 (4th Cir. 2004).

"Harmless plain error does not exist, all plain errors are harmful."

Chapman v. California, 386 U.S. 18, 23-24, 17 L. Ed 2d 705, 87 S.Ct. 924 (1967).

Lastly, with this issue, the Applicant would submit that statements addressed in the aforementioned instances made by the solicitor could very easily be construed "in the same context" as the current Respondent counsel defines the ground raised in segment V. of their Return: "Under S.C. Code § 17-27-50 (2003), Prima Facie showings, concerning his "due process issues."

Next, on Page 2 of 5, of the Respondent's Return, it is stated that...: "For the purposes of this Return, Respondent interprets Applicant's allegations to be allegations of ineffective assistance of counsel."

To which the Applicant asserts, ineffective assistance of counsel is, indeed, "not the," but rather, "one of the" grounds to be addressed herein. As evidenced thus far, in all aforementioned. None the less and First, however....

IV

On page 4 of 5 of the Return, the Respondent states....

"Prosecutorial misconduct is not an issue for post-conviction relief." But an issue availed upon through a direct appeal. Citing: S.C. Code Ann. § 17-27-20 (b) (2003). And Simmons v. State, 264 S.C. 417, 423, 215 S.E.2d 883, 885 (1974). Respondent goes further to state, however,.... "The Applicant could have raised this issue on appeal. The Failure to do so has

waived this allegation as grounds for relief. Regardless, it is the Applicant's burden to prove actual misconduct."

To all of which, the Applicant contends, First, through inquiry, what if due to counsel (or the court) not informing him of his right to a direct appeal, post-conviction becomes the "first appeal arena" in which he may initiate his concerns? Also, bearing in mind.... Firstly.... collaterally....

"In order to waive a direct appeal, a defendant must make a knowing and intelligent decision not to pursue the appeal." Davis v. State, 288 S.C. 290, 342 S.E.2d 60 (1986); White v. State, 263 S.C. 110, 208 S.E. 2d 35 (1974).

And secondly, through supposition, as the Applicant has elected to proceed in a PER matter, would it not be feasible to think that, given the knowledge of a direct appeal, (and its influence in a PER matter), the Applicant "would not" have elected to "not start, that?" Again, J.A.C.?

Further, As there was no direct appeal in which to raise "any issues," round "one" of the state's established appellate process terminated! Post-conviction proceedings represent - by the Applicant's interpretations - round "two" of this same circumstance. This is especially crucial to this matter when one recognizes:

- A.) The likelihood of the Applicant garnering "state relief" on his issues are estimated to be nil. Thus,....
- B.) "A state prisoner is only required to invoke "one complete round" of the state's established appellate process

to satisfy the exhaustion requirement(s) for habeas review.

Vilott v. Varner, 373 F.3d 327 (3rd Cir. 2004).

To satisfy the mandates of Vilott, the Applicant must utilize the PER arena to "initiate" his appellate agenda!

Further, still, it is this Applicant's knowledge that (indeed) prosecutorial misconduct is an (issue) that has been "raised and heard" at a PER hearing, and ruled upon in a PER "Final Order." It was introduced in a "Memorandum of Law in Support of a PER application and challenged (for preservation) by both a 59(c) Motion for Reconsideration and a Motion to Comply!

Lastly, "Exhaustion requirement satisfied because applicant addressed claim of due process and freedom from cruel and unusual punishment in state court pleadings."

Hawkins v. Mullin, 291 F.3d 658, 663-64 (10th Cir. 2002).

And... "If a state law permits a defendant who pleads guilty to appeal issues after the plea has been entered, a Federal Court may review these claims on habeas corpus."

LeFKowitz v. Newsome, 420 U.S. 283, 292-93 (1975);

... "Exhaustion is satisfied though claim not precisely articulated to the state court, but instead mentioned in paragraph focusing on different related claim."

Hill v. Lockhart, 28 F.3d 832, 834-35 (8th Cir. 1994).

The Applicant will contend that, through this presentation, his 14th Amendment claims of violation of due process will

1. Specifically, in Greenville County!

incorporate, both, acts of misconduct in support and procedural defects with the proceedings that have (and have not) taken place, thus far.

Prosecutorial Misconduct - IV - Brady violation

On page 4 of the Return Respondent asserts, "The Applicant could have raised this issue on appeal."

To which, the Applicant has already challenged! Next, it is asserted, "The Failure to go has waived this allegation as grounds for relief." Lastly, the Respondent asserts, "Regardless, it is the applicant's burden to prove actual prosecutorial misconduct..." and cites: Alabama v. Smith, 490 U.S. 794 109 S.

Ct. 2201 (1989).

From which, the Applicant draws two inferences:

- 1.) "Regardless" - adv. In spite of everything: anyway.
- 2.) "... applicant's burden..." The Applicant then defines the inferences as meaning:

Respondent counsel presents a conundrum! If it is asserted that the "allegation is waived," where does "Regardless" come into effect? And how? Secondly, if it is the "applicant's burden," doesn't "applicant" infer a "PCR litigant"? And as such, would'nt the place to address the "burden" be the Court of Common Pleas? Barring, a direct appeal? This conundrum is not rhetorical!

On page 2 of the Return, Respondent counsel contends..

"Any claims not specifically enumerated in the PER application or amendments will be opposed by the State at an evidentiary hearing, and the State will seek summary dismissal of vague or general claims at an evidentiary hearing." And, as such,

Prog. Mis. (A.) - (cont'd)

The Applicant contends that of the Four defendants involved all were charged under the "hands of one, hands of all theory." As such, the Applicant was informed - one week before the hearing - that two of his three co-defendants were offered a plea negotiation of twelve (12) years and that his third co-defendant's negotiation(s) were pending - in observance of what was revealed (or rather) what would be revealed through his testimony. As it would turn out, his third co-defendant would be released - after the Applicant's plea hearing - apparently with "time-served or probation - for the 2½ years he spent in county detention. His other two co-defendants offers would have stood firm! With the exception, that one co-defendant turned down the original offer and wound up with "fifteen years" from the second offer - (1) week later, that the solicitor offered him. Even that, consists of two offers!

The Applicant further contends that there was discussion of the V.O.A program, presented by his plea counsel. Though, how its implementation might have come to pass, is unknown. This was - to the Applicant's recollection - during their first visit.

As already elaborated upon-in the preceding pages-
the Applicant contends that "equal liabilities" should
have produced "equal remunerations" with the plea
circumstances!

* It should also be duly noted that much of the a-
forementioned can and should be attributed to his ar-
gument(s) concerning due process violation, as well!

Also, ... "Freedom from malicious prosecution is a con-
stitutional right."

Kinzer v. Jackson, 316 F.3d 139 (2nd Cir. 2003).

"Evidence of a prior crime is always prejudicial to a de-
fendant, because it diverts the attention of the jury from
the question of the defendant's responsibility for the crime
charged, to the improper issue of his bad character."

Salahuddin v. Mead, 174 F.3d 271 (2nd Cir. 1999).

IV - Ineffective Assistance of Counsel - Cont'd.

On pages 2 thru 4 of their Return, "Respondent inter-
prets Applicant's allegations to be ineffective assistance
of counsel."

On pages 3 thru 4 Respondent also asserts, "However, the
allegation of ineffective assistance of counsel probably
raises questions of fact that the record does not conclu-
sively refute. Accordingly, the Respondent requests an ordi-
nary hearing to fully resolve this issue."

To which, the Applicant respectfully responds, as the Respondent contends concerning section V. of their Return - "specificity" - with the Due Process ground, these "questions of Fact, not conclusively refuted by the record" are not addressed "at all" within the Return. Let alone, with any specificity that can be identified or addressed accordingly. Nonetheless, the Applicant herein submits his assessment(s) with regard to this ground.

The Applicant's contention with plea (defense) counsel First stems from the fact that - in hindsight - it is his belief that with plea counsel having a "form of an intimate recognition and acquaintance" with the opposing litigants and their family, it would have been better for the Applicant if plea counsel would have sought permission to recuse himself from this case.

Though (undoubtedly) counsel would attest otherwise - as he did at the hearing.

And yet, as argued within this memorandum - thus far and forthcoming - counsel's vigilance with this situation, could have been markedly more advanced. Particularly with

A.) The Applicant's acquisition of "so many numerous charges" under this "theory" of the "hands of one, hands of all," accomplice liability, of which, the South Carolina penal codes, carry no statute. And as such, no formal

indictment for jurisdiction of the courts.

B.) The lack of "any challenge whatsoever" with the solicitor's recitation of the facts and closing comments concerning his juvenile record, in particular relevance to this case, or, if in fact, since the solicitor chose to demonstrate the history of the two litigants' encounters to show the Applicant's propensity to burglarize the Respondent's household, defense counsel could have (at least) emphasized the fact that (again) the Applicant was never (nor ever) in the mindset, or rather of the mindset to inflict any detrimental physical harm upon these people.

"As a rule, whether a robbery was perpetrated with a deadly weapon is a question of fact for the jury, which meant the jury must be presented with the option of convicting a defendant on the "lesser offense" of robbery.

State v. Simmons, 360 S.C. 33 599 S.E. 2d 448 (2005).

Obviously, as this was a plea circumstance, the presentation would have been to the judge, understanding that.

"Prior crimes cannot be presented to show that the defendant had the propensity to commit the crime charged, because the prejudicial value would outweigh the probative value of the evidence.

State v. Peake, 302 S.C. 378, 396 S.E. 2d 302 (1990).

"Evidence of prior bad acts is inadmissible to show that the accused is a bad person.

Mitchell v. State, 298 S.C. 186, 379 S.E.2d 123 (1989).

"Counsel's Failure to object to improper comments that violated defendant's Fifth Amendment rights was found to constitute substandard performance in violation of defendant's Sixth Amendment rights."

Motire v. Wainwright, 811 F.2d 1430 (11th Cir. 1987).

C.) The "Kidnapping charge" in the Applicant's case, wherein, "as circumstances currently stand" (to the Applicant's knowledge), due to the fact that his plea counsel failed to stipulate to the court that there was (were) "no sexual innuendo or connotations involved, he (Applicant) must register as sexual offender upon release. An issue the Applicant would wish to have addressed herein! And, at the hearing.

D.) The advisement of a direct appeal in this case. If, for no other reason than to challenge the Kidnapping (registry) aspect of this situation. Although, all other aforementioned arguments contained herein are also considered of - at least - equal merit in this PER action.

E.) The investigatory revelations concerning how "one accomplice" managed to walk away with time served from county detention when all were considered equally liable for guilt.

"If counsel fails to subject the prosecution's case to a meaningful adversarial testing, then there has been a denial of Sixth Amendment rights that makes the adversary process itself presumptively unreliable.

U.S. v. Cronie, 466 U.S. 648, 104 S.Ct. 2098, 80 L.Ed.2d 657 (1984).

Conclusion

The applicant contends, and would explain... the letter acknowledging the court's receipt of his "Notice of Appeal and explanation brief requirements" (though dated September 12, 2013) was not received until September 23, 2013, through PER defense counsel. Counsel's enclosed letter was dated September 19, 2013, allotting "Twenty days" from that date in order to provide this brief. (Envelope and letter forthcoming). Applicant prays the court's allowance of twenty days from receipt of the documentation.

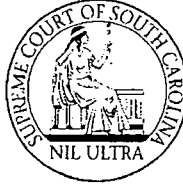
And lastly, ... "Pro se litigant's pleadings are to be construed liberally and held to less stringent standards than formal pleadings drafted by lawyers; if the court can reasonably read pleadings to state valid claims on which a litigant could prevail, it should do so, despite failure to cite proper legal authorities, confusion of legal theories, poor syntax and sentence construction, or litigant's unfamiliarity with pleading requirements."

Boag v. McDougal, 454 U.S. 364, 70 L.Ed.2d 531, 102 S.Ct. 700 (1982).

Sworn To and Before Me,
this 11 day of Oct, 2013.
Franklin L.S.
Notary Public of South Carolina
My commission expires: 12-16-2019

Respectfully,
Lakem Smith
Lakem Ojijwan Smith
Applicant (As Pl.)
RECEIVED

OCT 16 2013



The Supreme Court of South Carolina

DANIEL E. SHEAROUSE
CLERK OF COURT

BRENDA F. SHEALY
CHIEF DEPUTY CLERK

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September 12, 2013

Laura McCall Saunders, Esquire
PO Box 731
102 Church Street
Laurens SC 29360

Re: Lakeem O. Smith v. State
Appellate Case No. 2013-001921
Lower Court No. 2012-CP-30-00890

Dear Counsel:

This Court has received your notice of appeal, and the case has been assigned the appellate case number that appears above. Please use this number on all future correspondence relating to this matter.

All parties to this matter are advised that all filings must comply with the requirements of Rule 267 of the South Carolina Appellate Court Rules (SCACR). The SCACR are available online at www.sccourts.org/courtreg. Additionally, any filings submitted by counsel admitted in South Carolina must include counsel's bar number.

The attention of the parties is directed to the order relating to the inclusion of personal data identifiers and other sensitive information in documents filed with the Supreme Court of South Carolina and the South Carolina Court of Appeals. The order can be found at www.sccourts.org/courtOrders/HTMLFiles/2007-08-13-02.htm. Please note that the responsibility for insuring that information is redacted

or sealed as required by this order rests with counsel and the parties. This office will *not* review filings for redaction or to determine if materials should be sealed.

It appears that the sole issue in this case is petitioner's entitlement to belated direct appeal from his guilty pleas under White v. State. However, to pursue an appeal from a guilty plea, petitioner would have to "provide a written explanation showing that there is an issue which can be reviewed on appeal. This explanation should identify the issue(s) to be raised on appeal and the factual basis for the issue(s) including how the issue(s) was raised below and the ruling of the lower court on that issue(s). If an issue was not raised to and ruled on by the lower court, the explanation shall include argument and citation to legal authority showing how this issue can be reviewed on appeal." Rule 203(d)(1)(B), SCACR (explanation required when an appeal is taken from a guilty plea, Alford plea, or plea of nolo contendere). Therefore, I ask that you please provide the explanation required for an appeal from a guilty plea. This explanation should be provided within fifteen (15) days of the date of this letter.

If, as an officer of this Court, you determine that you cannot provide a good faith explanation, I would recommend that you send a letter to this Court and your client indicating that you cannot provide a good faith explanation. The letter should advise your client that he may submit a *pro se* guilty plea explanation within twenty (20) days from the date of your letter. *Cf. Dennison v. State*, 371 S.C. 221, 639 S.E.2d 35 (2006) (discussing procedure to be followed if counsel cannot provide a good faith explanation under Rule 243(c), SCACR).

Very truly yours,

A handwritten signature in black ink, appearing to be a stylized name, possibly "D. Johnson", written over a horizontal line.

CLERK

cc: James Rutledge Johnson, Esquire

**Laura M. Saunders
Attorney At Law**

P.O. Box 731
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Laurens, SC 29360

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September 19, 2013

Via U.S. Mail

Lakeem O. Smith, #348951
McCormick Correctional Institution
386 Redemption Way
McCormick, SC 29899

**Re: Lakeem O. Smith, #348951 vs. State of South Carolina
C/A No. 2012-CP-30-890**

Dear Lakeem:

Enclosed please find a filed copy of the Notice of Appeal I filed on your behalf. Also enclosed is a copy of a letter I received from the Supreme Court dated September 12, 2013. Because the original case resulted from a plea, and Rules 203 (d)(1)(B) and Rule 243(c) of the Appellate Court Rules require a detailed explanation of the issues to be considered on appeal if your appeal is from a guilty plea. I do not identify that you have any issues for appeal after a good faith effort to identify any issues on your behalf. **Therefore, I am advising you to submit a pro se guilty plea explanation within twenty (20) days from the date of this letter to the address provided by the Supreme Court Clerk.** We were able to amend the sex offender registry issue on PCR which will be helpful to you in the future.

In the meantime, if you have any questions please do not hesitate to write.

Thanking you, I am

Yours truly,



Laura M. Saunders

LMS/ File 4.700
Enclosure

COPY

THE STATE OF SOUTH CAROLINA
In the Court of Common Pleas

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SEP 09 2013

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

Frank R. Addy, Presiding Circuit Judge – Laurens County **S.C. Supreme Court**

Case Nos. 2009-GS-30-1407; -1408; -1409; -1410; -1411; -1412; -1413
PCR C/A Number: 2012-CP-30-890

State of South Carolina,

Respondent,

v.

Lakeem O. Smith,

Appellant.

NOTICE OF APPEAL

Lakeem O. Smith, #348951 appeals the conviction and sentence dated December 9, 2011 pursuant to an Order granting a review of his direct appeal issues under Post Conviction Relief C/A Number 2012-CP-30-890, and pursuant to White v. State, 263 S.C. 110, 208 S.E.2d 35 (1974).

September 5, 2013



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PCR Counsel for Lakeem Smith

Other Counsel of Record:
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(803) 734-3963

THE STATE OF SOUTH CAROLINA
In the Court of Common Pleas

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

Frank R. Addy, Presiding Circuit Judge – Laurens County

Case Nos. 2009-GS-30-1407; -1408; -1409; -1410; -1411; -1412; -1413
PCR C/A Number: 2012-CP-30-890

State of South Carolina,

Respondent,

v.

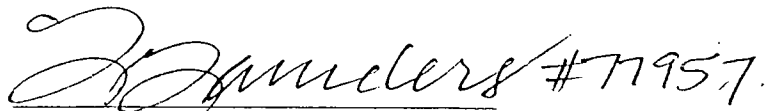
Lakeem O. Smith,

Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on the Respondent, State of South Carolina., by depositing a copy of it in the United States Mail, postage prepaid, on September 5, 2013 addressed to its attorney of record, Rutledge Johnson, Esquire, Assistant Attorney General, PO Box 11549, Columbia, South Carolina 29211.

September 5, 2013.



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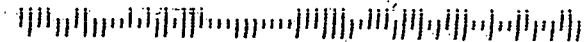
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29360
SEP 20 2013
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SEP 23 2013

287 MCCI
MAIL ROOM

Lakeem O. Smith, # 348951
McCormick Correctional Institution
386 Redemption Way
McCormick, SC 29899



Mr. Lakeem Oluwan Smith, # 348951
McCormick Correctional Institution / F1-A-
386 Redemption Way
McCormick, S.C. 29899

Hon. Daniel E. Shearouse
Clerk - South Carolina Supreme Court
P.O. Box 11330
Columbia, South Carolina

Legal Mail (Please Do Not Fold)