

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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MAY 19 2025

SC Court of Appeals

APPEAL FROM YORK COUNTY

Court of General Sessions

Honorable R. Keith Kelly, Circuit Court Judge

Appellate Case No.: 2025-000380

Case No.: 2021-GS-46-06555,-06555a

The State, Respondent

VS.

Rayquan Jamal Steele, Appellant

PERMISSION FROM THIS COURT TO RELINQUISH JURISDICTION BACK
TO THE LOWER COURT TO ADDRESS THE AFTER DISCOVERED EVIDENCE
AND THE ASSERTION OF INEFFECTIVE OF COUNSEL AND RULE
THIS MOTION IS WITHOUT PREJUDICE

This motion by this pro se litigant and without counsel, seeks permission from this Honorable Court to Relinquish Jurisdiction back to the Lower Court to address the claim of the after discovered

evidence. To avoid the duplicity of said proceedings; being dealt with twice, this Honorable Court has the authority to relinquish jurisdiction back to the lower court to address the **assertion of after discovered evidence and possibly a claim of ineffective assistance of counsel.**

To support this said motion, there were 5 people in that apartment on 9/25/21. There was a 3 year old little girl Raylen Steele, to which, it can be said, that her testimony was not needed.

There was the victim, Yorel Milton, he can't testify because of his imminent death.

There was Brianna Bright who testified at trial.

There was this Appellant, Rayquan Jamal Steele, who testified.

The other person that was there during this incident/ordeal was JaNyra Jones, who did not testify.

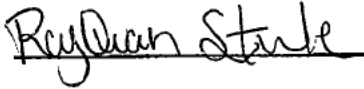
This Appellant has a sworn affidavit from JaNyra Jones, which she was available before trial, during trial, and now after trial of what her testimony would have shared of what she considers the truth. Who knows what the jury could have surmised from JaNyra Jones testimony. Who knows? We would never know?

Without counsel's acts of locating and presenting JaNyra Jones as a witness, any kind or witness, where the sixth amendment to the constitution of the United States guarantees this appellant receive fair representation and that alone amounts to the lack of effective of counsel.

Appellant has sworn affidavits from his Mother Bridgett Steele Kennedy along with her husband Raymond Kennedy, to support that Attorney Geoffrey Dunn made the statement of JaNyra Jones couldn't be found and that her testimony would not be any good anyways.

These are evidentiary matters that must be addressed by the lower court in order for the truth to prevail

I HEREBY CERTIFY that a true and correct copy of the foregoing "permission from this court to relinquish jurisdiction back to the lower court to address the after discovered evidence and the assertion of ineffective of counsel and rule this motion is without prejudice to the Office of the Clerk of Court, 1220 Senate Street Columbia, South Carolina 29201, and the Attorney General, Honorable Alan Wilson, P.O. Box 11549, Columbia, S.C. 29211 this day of 28 April, 2025.



Rayquan Jamal Steele

In pro se

County of Richland

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State of South Carolina

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AFFIDAVIT OF JA'NYRA JONES

I, Ja'Nyra Jones, being of sound mind and over the age of eighteen, hereby declare under penalty of perjury that the following statements are true and correct to the best of my knowledge and belief:

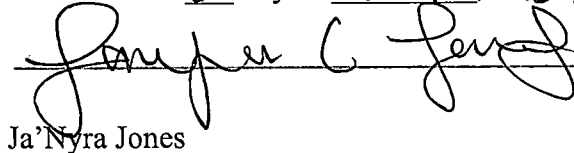
1. My name is Ja'Nyra Jones. Since February 20, 2025, I haven't been able to find peace knowing that, had I been called to testify, I would have testified truthfully to the following events.
2. On September 25, 2021, I was staying at my cousin Brianna's apartment along with my three-year-old daughter, Raelynn, and my friend, Yorel Milton.
3. Brianna and I were in the kitchen—she was cooking, and I was sitting on the kitchen counter. There was a knock at the door, and Brianna said, "I'll answer it." She then said, "It's just your baby daddy."
4. After letting him into the apartment, my child's father approached me and asked, "Where's my daughter?" I responded, "You don't have the right to ask me about her," and I ignored him, remaining seated on the kitchen counter. Brianna had her back turned to both of us.
5. As my child's father continued to question me about Raelynn, my friend Yorel Milton suddenly began shooting. I was shocked, as I had no idea he even carried a gun.
6. I was not afraid, but I remember the shots sounding like there were around twenty of them. I was grazed on the legs by the wild gunfire. I was unaware at the time that my child's father had been shot.
7. A loud boom followed, after which the shooting stopped. I then realized that Yorel Milton had been shot. I immediately jumped down from the counter and began administering chest compressions and CPR.

8. I never had the opportunity to ask Yorel why he started shooting, nor was I able to tell him that I had everything under control.
9. I later learned the details of the trial from Bridgett Steele Kennedy, the grandmother of my daughter Raelynn. When I found out that Rayquan had been found guilty, I felt terrible—because I knew in my heart that not all the facts were presented during his trial.
10. Had I been called to testify, I believe I could have provided the jury with a different version of events than the one presented by my cousin Brianna.
11. The individuals present at the apartment on September 25, 2021, were Yorel Milton (who ultimately passed away), Brianna (who gave her version of events), and my child's father (who, I was told, gave his own version). Raelynn, being only three years old at the time, was not in a position to testify.
12. I was there. I am still available and willing to testify. I do not understand why I was excluded from testifying. I ask: why was I left out of the equation?

CERTIFICATION

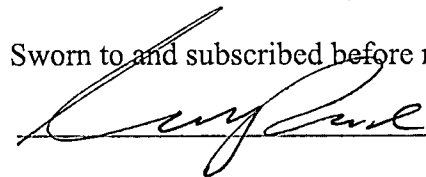
I HEREBY CERTIFY that I, Ja'Nyra Jones, have read the above statement and, being of sound mind and acting without intimidation, fear of reprisal, or coercion, do hereby swear under penalty of perjury that the above statements are true and correct.

Executed this 8 day of APRIL, 2025 in Charlotte.



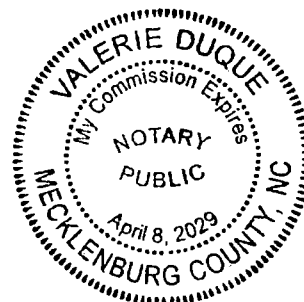
Ja'Nyra Jones

Sworn to and subscribed before me this 8th day of April, 2025.



Notary Public

My Commission Expires: 04-08-2029



COUNTY OF RICHLAND

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AFFIDAVIT OF BRIDGETT STEELE KENNEDY

My name is Bridgett Steele Kennedy, I am the mother of Rayquan Steele, whom was charged with the murder of Yorel Milton.

On February 14, 2025, I was in attendance with my husband, Raymond Kennedy, along with Attorney Geoffry Dunn and my son Rayquan Steele, when I heard my Son Rayquan ask Attorney Geoffry, what about the testimony of JaNyra Jones.

Attorney Geoffry, "stated she couldn't be found and her testimony would be no good anyways."

I left the conversation as though it was a normal conversation. And proceeded to let the process run its course.

I HEREBY CERTIFY, Which, I, Bridgett Steele Kennedy, states under the penalty of perjury, have read, and of sound mind, without the threat of coercion, intimidation, and or fear or reprisals and or retribution, states that the above stated facts are TRUE and CORRECT.

Bridgett Steele Kennedy

Bridgett Steele Kennedy

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AFFIDAVIT OF RAYMOND KENNEDY

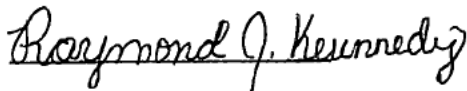
This here affidavit of RAYMOND KENNEDY, states that on February 14, 2025, I had attended a hearing of some sorts, but I was there lending support to my wife Bridgett Steele Kennedy, whose son Rayquan Steele, was there along with Attorney Geoffry Dunn was in attendance.

On this particular day, I distinctly remember the conversation went as follows: Rayquan stated what about JaNyra Jones testimony? Attorney Geoffry, then specifically states that JaNyra was nowhere to be found and her testimony would be no good anyways.

My mind was trying to comprehend what was said but I left the conversation as it was and that JaNyra Jones testimony was not needed.

Again my recollection to this, I left that meeting confused as to the events of the upcoming trial as to why JaNyra Jones was not needed and or needed for trial.

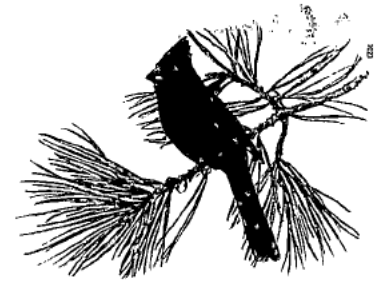
I HEREBY CERTIFY, that I, Raymond Kennedy, have read, and of sound mind, without the threat of coercion, intimidation, and or fear or reprisals and or retribution, states under penalty of perjury that the above stated facts are TRUE and CORRECT.



Raymond Kennedy

Ray Owen Steele SCDC # 396392
Lee Correction Institution F4# 2145
990 Wisacky Hwy
Bishopville SC 29010

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