

State of South Carolina
In the Court of Appeals
York County

Londell L. Alston,
Appellant,
v.

State of South Carolina,
Respondent.
Case No: 2025-000197

Motion To Compel Production
of Unredacted Body-Worn
Camera Footage

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SC Court of Appeals

Comes Now, the appellant, Londell Alston, by and through undersigned counsel, and respectfully moves this court to compel the production of unredacted body-worn camera (BWC) footage recorded by Officer Dakota Rhoads on July 14, 2023. In support thereof, appellant states as follows:

Factual Background

1. On July 14, 2023, Officer Dakota Rhoads conducted a protective search of appellant Londell Alston's coat pocket during a traffic stop.
2. The protective search has been contested as invalid under both fourth Amendment to the U.S. Constitution and Article 1, Section 10 of the South Carolina Constitution.
3. Body-Worn Camera footage from Officer Rhoads captures this search, however, the footage provided to the defense

contains redactions removing the audio of the officer asking about an object found during the search.

4. This redaction obscures critical evidence relating to the officer's intent, knowledge, and the legality of the search.

Legal Argument

5. South Carolina law requires full disclosure of all evidence material to the defense and relevant to the claims at issue. See Rule 5, SCRCrimP, S.C. code ann 15-27-130.

6. The redacted portion of the BWC footage contains exculpatory and impeaching evidence relevant to the validity of the search. The redaction unfairly prejudices Appellant's right to a fair trial by withholding potentially crucial information.

7. The improper alteration or redaction of evidence may constitute spoliation, warranting the imposition of sanctions or adverse evidentiary inferences. See *State v. Bowman*, 336 S.C. 485, 623 S.E.2d 378 (2005).

8. The absence of the unredacted footage deprives Appellant of the ability to challenge the circumstances and legality of Officer Rhoad's conduct fully.

Relief Requested

Wherefore, Appellant respectfully requests that this court:

1. Order the production of the unredacted Body-Worn camera footage recorded by Officer Dakota Rhoads on July 14, 2023.

2. Require the trial court to conduct a hearing to investigate the justification and circumstances surrounding the redaction.
3. Impose appropriate sanctions if the redaction was improper or in violation of discovery obligations.
4. Grant any other relief deemed just and proper.

Respectfully Submitted,

Londell L. Alston - Plaintiff

Attorney for Appellant: SCCID has not appointed counsel yet

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Dated 6/19/2025

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