

**RECEIVED**  
Sep 18 2025  
SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT ET. AL.,

**RECEIVED**  
SEP 18 2025  
S.C. SUPREME COURT

\_\_\_\_\_  
CASE DOCKET NO. \_\_\_\_\_

APPEAL FROM THE COUNTY OF KERSHAW  
IN THE KERSHAW COUNTY COURT OF GENERAL SESSIONS

CASE NO. 2004-GS-28-00385  
APPLICATION FOR FORENSIC DNA TESTING

LAWRENCE L. CRAWFORD AKA JONAH GABRIEL JAHJAH T. TISHBITE,

APPELLANT

Vs.

THE STATE OF SOUTH CAROLINA, THE COUNTY OF KERSHAW ET. AL.,

RESPONDENT

\_\_\_\_\_  
NOTICE OF APPEAL  
MOTION FOR DECLARATORY JUDGMENT  
\_\_\_\_\_

TO: THE S.C. SUPREME COURT,  
THE KERSHAW COUNTY COURT OF GENERAL SESSIONS,

JUDGE NEWMAN WHO WAS THE JUDGE WHO PRESIDED OVER THE  
APPLICANT'S CASE UNDER CASE 2013-CP-400-0084 AND

2006-CP-400-3567, 3569, 3569 IN RICHLAND COUNTY CAME TO SIT UPON THE APPELLANT'S APPLICATION FOR FORENSIC DNA TESTING ON SEPTEMBER 11, 2025. THE APPLICANT WAS NEVER GIVER PRE-NOTICE OF HER INTENDING TO SIT UPON THIS CASE AT ALL AND DISCOVERED IT ONLY WHEN HE WAS BROUGHT TO COURT ON SEPTEMBER 11, 2025. THE APPLICANT IMMEDIATELY MOTIONED FOR HER RECUSAL DUE TO HER CONSPIRING UNDER COLOR OF STATE LAW IN UNCONSTITUTIONAL BIAS TO PROTECT THE STATE BEING INAPPROPRIATELY INFLUENCED TO PREVENT EVIDENCE OF ACTUAL INNOCENCE IN THE FORM OF THE DNA FROM BEING OBTAINED SINCE 2006 AS WAS ARGUED IN THE 2013-CP-400-0084 CASE AND OTHER RELATED CASES FILED, WHERE MOTION TO VACATE THAT JUDGMENT WITHIN THOSE CASES HAS BEEN LEFT UNRESOLVED UNTIL THIS DAY. IT IS THE APPELLANT'S POSITION THAT IN ACTS OF MACHINATION IT WAS THEIR INTENT TO ENSURE THAT JUDGE NEWMAN AGAIN SAT UPON THE APPELLANT'S CASE TO CAUSE IT IRREPARABLE HARM AND THWART JUST AND FAIR JUDICIAL REVIEW IN VIOLATION OF DUE PROCESS LAW. ONCE SITTING UPON THE DNA APPLICATION CASE JUDGE NEWMAN IGNORING CLEAR RIGHTS ESTABLISHED BY THE DNA STATUTES DENIED THE DNA APPLICATION IN FURTHERANCE OF THE CONSPIRACY THAT OCCURRED INVOLVING THE RICHLAND COUNTY CASES. THE MOTION FOR HER RECUSAL WAS MADE AND SHOULD HAVE BEEN GRANTED WHERE HER IMPARTIALITY IS REASONBLY IN QUESTION AND THE POTENTIAL FOR BIAS HAS RISEN TO AN UNCONSTITUTIONAL LEVEL CREATING STRUCTURAL ERROR THAT VOIDS HER JURISDICTION AB INITIO, PATEL v. PATEL, 359 S.C. 515, 599 S.E.2d. 144(S.C.App.2004); BASKIN v. WALKUP, 445 S.C. 353, 913 S.E.2d. 282(S.C.App.2025); DUKE ENERGY CAROLINAS, LLC. v. NTE CAROLINAS II LLC., 111 F.4TH. 337 (4th.Cir.2024); WILLIAMS v. PENNSYLVANIA, 136 S.Ct. 1899(U.S.2016).

THE APPELLANT IS GIVING NOTICE OF APPEAL ALSO TO SEEK DECLARATORY JUDGMENT TO REQUIRE THE STATE TO RELEASE THE DNA EVIDENCE SOUGHT AND OTHER EVIDENCE PURSUANT TO DISCOVERY WHEN DNA SAMPLES IN THE POSSESSION OF THE STATE CAN BE TESTED TO ANY PERSON EVEN IF THE PERSON IS NOT A DEFENDANT IN THE CASE. INJUNCTIVE AND DECLARATORY RELIEF CAN BE GRANTED WHEN STATE AND PROSECUTOR'S DENIAL OF DNA TESTING DEPRIVES HIM OF LIBERTY INTEREST IN UTILIZING STATE PROCEDURES TO OBTAIN AN ACQUITTAL IN

VIOLATION OF RIGHTS OF DUE PROCESS OF LAW, AND DECLARATORY JUDGMENT WOULD REDRESS THE INJURY OR ORDERING A CHANGE IN THE LEGAL STATUS OF THE PARTIES AND ELIMINATING THE STATE PROSECUTOR'S ALLEGEDLY UNLAWFUL JUSTIFICATION FOR DENYING DNA TESTING. THIS IS NOTICE OF APPEAL AND THE SEEKING OF DECLARATORY JUDGMENT, GUTIERREZ v. SAENZ, 606 U.S.--, 145 S.Ct. 2258(U.S.2025); LONG v. BONDI,--F.4TH.--, 2025 WL 2348708 (4th.Cir.2025); WOOD v. PATTON, 2025 WL 2237942 (5th.Cir.2025); RAYMOND E. LUMSDEN, #2109472 v. PAUL JOHNSON, 2025 WL 2590256.

RESPECTFULLY,  
JONAH THE TISHBITE

A handwritten signature in black ink, appearing to read 'Jonah The Tishbite', with a large, stylized flourish at the end.

SEPTEMBER 11, 2025