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SC Court of Appeals

THE SOUTH CAROLINA
In The Court Of Appeals

Case No. 2022-001437

Johnathan Daniels, Appellant.

v.

The City of Cayce Respondent,

Petition For Rehearing

For good cause, pursuant to South Carolina Appellate Court Rules 221(b), Appellant requests that this appeal be reheard by the Court for full a fair consideration of all relevant arguments made by Appellant, and that any remittitur to the municipal court at the very least allow Appellant a right to stand trial before a jury of his peers. Frankly, Respondent's intentional misquoting of the Municipal Transcript, and other shenanigans have misled this Court.

Realizing that Appellant is Pro Se in this matter, this Court's patience is humbly requested. Appellant has spent a great deal of time researching and drafting his briefs to try and make this complicated case manageable for the Court, and respectfully asks that his briefs, at the very least, be read and considered before a rush to judgment. Although the penalties imposed in this case are not severe, Appellant values his Constitutionally protected rights and intends to defend those rights stridently.

I. THIS COURT'S OCTOBER 1, 2025 DECISION IS BASED ON AN INTENTIONAL, FALSE MISREPRESENTATION OF THE RECORD BY RESPONDENT

This Court's October 1st, 2025 decision appears to have been based solely on Respondent's Brief and arguments, which were intentionally false and deceptive misquotations

of the Municipal Transcript. Respondent has intentionally mischaracterized and misquoted the municipal transcript in his Final Brief Of Respondent at p. 4, stating that:

> "The partial transcript of the municipal court proceedings clearly shows that the Appellant was aware of the negotiated penalty for all guilty plea charges, and the trial judge's acceptance of those penalties, before Appellant entered a guilty plea. The prosecutor recited a negotiated penalty of fine only of $183.63 on the speeding charge and a fine only of $155.00 on the no driver's license charge, and a nolle prosequi of the failure to register vehicle charge. After the description of the negotiated plea, the trial court stated, according to the partial transcript, "I'll tell you that I'm accepting it, and I'm also accepting the recommendation." The guilty plea followed. (R. p. 63, line 11 – p. 66, line 4). Appellant knew the penalties to be imposed before he voluntarily entered the guilty plea."

Only if this Court were to take Respondent's mischaracterization and misquotation to be true, without reviewing the Municipal Transcript to confirm, would this Court's recent decision make any sense. In any case, the Court's reaction to this manipulation by Respondent was anticipated by Appellant and pointed out to this Court in the Final Reply Brief Of Appellant on pp. 7-9. In his Final Reply Brief Of Appellant at pp. 8-9, Appellant informed this Court, in part, that:

> "In presenting this lie to this Court, Respondent has intentionally misquoted the statement of the municipal judge, by deliberately removing the "IF" portion of the statement made by the judge. In an effort to deceive this Court into believing that Appellant was aware of the sentences before he plead guilty, Respondent falsely claims that the municipal judge said, "I'll tell you that I'm accepting it, and I'm also accepting the recommendation," and that Appellant's plea followed. (Initial Brief Of Respondent p. 4 last paragraph, thru to p. 5 ¶ 1). This is not only incorrect, but it is also an attempt to lie to this Court! Respondent is up to legal shenanigans once again.

> Now, examining the Municipal Transcript, what the municipal judge actually said was, "Well, [pause] the first thing we have to establish is that you are entering this guilty plea and then after you've uh, uh entered it-- Well, first of all, I'll-- **if I accept it**, I'll tell you that I'm accepting it, and I'm also accepting the recommendation. But then you have another opportunity to tell me anything else you wanna tell me in mitigation, but you will have already entered that guilty plea." (Municipal Transcript, R. p. 64, line 22 – p. 65, line 2). Appellant's guilty pleas follow **after** (Municipal Transcript, R. p. 65, lines 4-7), **later** followed by the judge's acceptance of the pleas and recommendations (Municipal Transcript, R. p. 65, line 15)."

This order of events differs drastically from the order of events Respondent seeks to have this Court accept, and the Municipal Transcript makes this point inarguable, negating any notion that Appellant had a full understanding of the consequences of the pleas before making them.

II. THE MUNICIPAL JUDGE MISSTATED THE POTENTIAL SENTENCE FOR SPEEDING.

Appellant asks that this Court seriously consider a second major factor contributing to Appellant's unknowing and mistaken decision to make the guilty pleas, namely that the municipal judge misstated to Appellant that the law allowed him [the municipal judge] to sentence Appellant to 30 days in jail for the speeding charge[1]. However, the maximum punishment for the speeding charge is a FINE ONLY. This misstatement of fact, made by the municipal judge was the primary impetus that led Appellant to consider any plea whatsoever.

[1] Also interesting is the fact that, like the municipal judge, the circuit court judge initially misstated the same possibility of a 30-day jail sentence for the speeding charge against Appellant. (R. p. 49, lines 13-21); however, unlike the municipal judge, the circuit court judge did not have the benefit of presenting a revisionist Return before others recognized his inaccuracy.

Respondent's Final Brief, at p. 4 states that, "the partial transcript also undercuts Appellant's position on the trial court's alleged misstatement of a possible jail penalty for the speeding charge." Here, Respondent is referencing some non-existent pre-knowledge that Appellant supposedly had when making the guilty pleas. As this Court has now been informed of the accurate reading of the Municipal Transcript, this can be recognized as the ridiculous statement it is. In Appellant's mind, until the municipal judge accepted the pleas and recommendation, the judge retained the authority to pass any sentence allowed by law; including the potential 30-day jail sentence that the municipal judge had misstated. That misstatement of the potential sentence was previously complained of to this Court in the Final Brief Of Appellant at pp. 31-33, stating in part:

> "The municipal judge erred in stating that he could sentence Appellant to 30 days in jail AND a fine for violation of 56-5-1520(G)(3), when in reality a violation of 56-5-1520(G)(3) (More than 15 over, but less than 25 over) is punishable by a FINE ONLY. (R. p. 29, Oath at lines 7-8; R. p. 31, lines 11-13; R. p. 53, lines 19-23).
>
> This error was tantamount to a threat, and it did work to coerce and induce the unrepresented Appellant into pleading guilty to two of the three charges in this case. Appellant was more than willing to go to trial for the two nonmoving charges in this case, but the erroneous threat of jail time for the speeding violation (for which Appellant offered no defense), induced Appellant into making a plea deal with the State's prosecutor; but for the misstatement of penalties, Appellant would have taken the all of the charges to trial before the jury. (R. p. 31, line 15 – p. 32, line 6; R. p. 34, lines 12-16).
>
> In making the pleas, Appellant's primary motivation was to avoid a jail sentence. (R. p. 66, lines 17-20; R. p. 52, lines 7-16). The misstated possibility of jail time for the speeding violation was the SOLE AND ONLY prospective jail time Appellant considered to be a likely outcome when agreeing to the plead guilty. (R. p.108). Considering that Appellant

> believed then, and still believes today, that the municipal court lacked subject matter jurisdiction for the two nonmoving charges, which were unconstitutionally prosecuted according to the state and federal constitutions, as well as statutorily prohibited by South Carolina § 1-32, Appellant certainly did not think he could be jailed for convictions under those two charges. (R. p. 66, lines 8-20). Appellant felt so strongly that his being convicted and sentenced to jail time for the two nonmoving charges was not possible that he drafted and filed a 20-page motion for a directed verdict, with another 20 pages of proofs with the municipal court 3 weeks before the trial date; Appellant prematurely requested a ruling on his motion for a directed verdict just minutes before he proffered the guilty pleas. (R. p. 13, item "5"; R. p. 32, line 25 – p. 33, line 6). This demonstrates that Appellant still did not think he could be found guilty of the nonmoving charges if taken to trial; the municipal judge did not rule against Appellant's motion, and Appellant had, and still has, no reason to think that he is incorrect in his grounds for making that motion. Again, but for the misstatement of penalties, Appellant would have taken the all three of the charges to trial before the jury. Taking ALL facts into account, including Appellant's religious beliefs and claims of substantial burden that appear in the record, there was no factual basis for the guilty plea to the Driving Without A License charge, as Appellant's guilt was impossible. (R. p. 32, line 25 - p. 34, line 14). Apart from the speeding charge, Appellant was not convinced of his guilt, or that he could be found guilty, nor did he derive any benefit from making the pleas. (R. p. 37, lines 2-8)."

To be clear, when the guilty pleas were made, Appellant thought he could be sentenced to 30 days in jail if found guilty of speeding. At the time of making the guilty pleas, Appellant did not have a full understanding of the consequences of his pleas, nor did he have accurate knowledge of the potential punishment he was avoiding by making the pleas; therefore, the pleas cannot be valid. See *Roddy v. State*, 339 S.C. 29, 33, 528 S.E.2d 418, 421 (2000) ("To find a

guilty plea is voluntarily and knowingly entered into, the record must establish the defendant had a full understanding of the consequences of his plea and the charges against him.").

III. APPELLANT'S GUILTY PLEAS WERE NOT KNOWINGLY OR VOLUNTARILY MADE, AND APPELLANT HAS NOT WAIVED HIS SCRFA AND ESTOPPEL DEFENSES, AND RETAINS HIS CONSTITUTIONAL ARGUMENTS.

In this case, Appellant did not have a full understanding of the consequences of his pleas nor did he have realistic knowledge of the potential sentence for the speeding charge against him, therefore, an enumeration of specific rights waived should be required; otherwise, no waiver of Appellant's Constitutional rights has lawfully occurred. A guilty plea may not be accepted unless it is voluntarily and understandingly made. *Boykin v. Alabama*, 395 U.S. 238, 242 (1969); Although the trial court is not required to direct defendant's attention to each right and obtain a separate waiver, the record should indicate the defendant was fully aware of the consequences of the guilty plea. *State v. Lambert*, 266 S.C. 574, 225 S.E.2d 340, (1976); [A]n enumeration of specific rights waived is not required where the record otherwise reveals affirmative awareness of the consequences of a guilty plea. *Id* at 579, 225 S.E.2d at 340.

Nowhere in the record did Appellant ever indicate that he was aware that the punishment for the speeding charge was a FINE ONLY, and all of Appellant's acknowledgements of the potential speeding sentence throughout the entire Record support the conclusion that Appellant believed the inaccurately cited potential sentence of 30 days in jail. There is absolutely nothing anywhere in the Record indicating that Appellant ever thought or knew the correct potential speeding sentence before making the guilty pleas. Rayford v. State, 314 S.C. 46, 48, 443 S.E.2d 805, 806 (1994) (finding the petitioner's guilty plea was voluntarily made when he admitted committing the crimes, acknowledged the potential sentences, and stated his plea was not induced by promises).

IV. APPELLANT WAS NOT INFORMED OF HIS RIGHTS AND DID NOT KNOWINGLY OR INTENTIONALLY WAIVE ANY RIGHTS

Regarding Appellant's rights under *Boykin*, this Court has incorrectly concluded that Appellant was aware of these specific rights. There is no evidence, anywhere in the Record, of Appellant being aware of these rights; the prosecution never claimed that Appellant was made aware of these rights, at any point; and, the circuit court never affirmatively confirmed Appellant's awareness of his rights under *Boykin*. See Final Reply Brief Of Appellant at pp. 10-11, which states in part:

> "At the appeal hearing, the circuit court judge inquired to determine if Appellant had been notified "of his right to remain silent, right to a jury trial, right to confront and cross-examine the witnesses the state would call against him?" Respondent's attorney, being the same prosecutor that participated in the plea hearing in the "closet", having first hand knowledge of what was said in that "closet" responded, "Unless the Return addresses that, I can't answer that specifically, your Honor." (R. p. 50, lines 16-23). During this line of questioning by the circuit court judge, Respondent's attorney persisted to evade the question, talking a lot, but failing to answer the question with any specificity. (R. p. 49, line 22 – p. 52, line 2). On this subject, the municipal Return relied upon by Respondent's attorney fails to show that the municipal judge met the minimum Constitutional warning requirements of the Due Process Clause of the 14th Amendment of the U.S. Constitution. The Return shows that the judge only informed Appellant of his rights to a jury trial, a bench trial, and an attorney. (R. p. 13, item "2"). Of the three warnings of waiver of rights inquired of by the circuit court judge, the unrepresented Appellant was only given one of those warnings, and barely that. Appellant had been notified of his right to a jury trial, at a temporally distant motion hearing, nearly a year prior to the trial date. Obviously, the unrepresented Appellant was never notified of his (1) privilege against self-incrimination (i.e. to remain silent) or (2) his right to confront and cross-examine the witnesses

the state would call against him, and the record in this case is clear on this. (R. p. 50, line 3)."

Given that Appellant lacked the required "full understanding", and the guilty pleas were not knowingly made, a clear enumeration of Constitutional waivers need exist in the record before this Court should assume validity of Appellant's pleas and or purported Constitutional waiver of rights. Respectfully, it appears that assumptions have been made to rationalize that Appellant was, at the time of his making the guilty pleas, aware of his rights under *Boykin* where absolutely no supporting evidence exists anywhere in the Record.

Further, the municipal court failed to notify the unrepresented Appellant, as he plead guilty before that court, of nearly all rights recommended to be noticed by this State's higher judicial authorities, including Appellant's Constitutional rights. Appellant made this clear to this Court in his Final Brief Of Appellant at pp. 37-38, which states, in part:

> "The municipal judge erred in accepting Appellant's guilty pleas because the judge never notified Appellant of his rights and waivers, such as: Appellant's rights to an attorney if found indigent, to confront his accusers, to his privilege against compulsory self incrimination, to testify on his own behalf, to cross examine state witnesses, that the state had to prove beyond a reasonable doubt that he is guilty, that the jury's verdict had to be unanimous, that Appellant understood that he was admitting all matters of fact in the accusation, that by pleading guilty Appellant was giving up any objections he may have to the charges, to an accurate citing of maximum penalties the court could impose, to sign and complete a form SCCA 685.
>
> Appellant was not aware of the abovementioned rights at the time of his making the pleas, and was thus denied the opportunity to make an informed decision before entering the pleas. As a most relevant illustration, even in giving the guilty plea to the nonmoving charge for driving without a license, Appellant was still reliant upon his right to appeal his conviction for the charge, which he believed to be unconstitutional-as-enforced, and

he had no idea that giving the plea would forfeit his right to appeal that conviction. (R. p. 32, line 7 – p. 33, line 6). Appellant had been diligent in making objections on the record because he had a determined intent to appeal certain prior rulings, and had absolutely no intention of giving up that right. (R. p. 32, lines 16-23; R. p. 52, line 17 – p. 54, line 5).

The flawed "Judge's Notes" (R. p. 13) appear to have been given undue weight by the circuit court, considering that the record is otherwise silent on the issue of whether or not the municipal judge informed Appellant of his rights. In his "Judge's Notes", at item #2 the municipal judge does not even claim that he informed the unrepresented Appellant of any rights beyond Appellant's right to a jury trial, a bench trial, and an attorney, and for those notices he relies upon insufficient notices given at an earlier hearing which occurred nearly a year prior to the day the guilty pleas were made. (R. p. 49, line 22 - p. 50, line 3; R. p. 50, line 18 - p. 51, line 5; R. p. 51, lines 12-23)."

V. THE MUNICIPAL JUDGE DENIED APPELLANT THE RIGHT TO TRIAL AND INSTIGATED THE GUILTY PLEAS OF HIS OWN DESIRE

Importantly, in deciding that Appellant's guilty pleas were made knowingly and voluntarily, this Court did not address Appellant's complaint that the municipal judge inappropriately refused Appellant's right to trial and that he also repeatedly insisted that Appellant negotiate with the prosecutor to make a deal. The municipal judge intentionally denied Appellant due process by, twice, denying Appellant access to trial. As far-fetched as this might sound, the municipal transcript captured the municipal judge's statements on the Record. When those statements are considered along with the judge's pressuring Appellant to make a plea deal with the prosecutor, the judge's intentions are clear. With regards to plea-bargaining, the judge must remain isolated and detached from the negotiations. "A plea induced by the influence of the judge cannot be said to have been voluntarily entered." State v. Cross, 270 S.C. 44, 240 S.E.2d 514, at 516-517, (1977). Appellant previously notified this Court of these matters in his Final Brief Of Appellant at

p. 36, which states:

> "As explained to the circuit court, the municipal judge went out of his way at the start of the proceedings, whispering while saying that he could not "enter a plea with them [the jury] in here." IMPORTANTLY, this whispered statement was made, at the opening of the hearing, after Appellant and the prosecutor had already informed the judge that they had conferred without reaching an agreement and that Appellant was ready to start trial. (R. p. 62, lines 2-3; R. p. 34, lines 8-25)…"
>
> "Further, it is evident from the Municipal Court Transcript, that the municipal judge intended **NOT** to allow the trial of the Appellant to occur, and that he gave considerable effort to ensure that it did not occur. (R. p. 34, line 23 - R. p. 35, line 17). The municipal judge let the jurors know that he was actively working to avoid having the trial before insisting on additional plea discussions. (R. p. 62, lines 10-13). After Appellant accepted the plea deal under duress, the judge let the jury know that he was successful in avoiding having the trial. (R. p. 68, lines 4-7). The municipal judge owed a duty to ensure Appellant's rights to due process and a trial by jury, not a duty to ensure convenience to anyone else. The totality of circumstances, viewed objectively, shows that the judge went too far to force negotiations in an effort to disallow the trial of Appellant, and that his successful efforts effectively denied Appellant meaningful access to a trial by jury and due process. Appellant believes that his novel defense under South Carolina § 1-32 and the court's officers labeling of Appellant, as a "sovereign citizen", is what motivated these tactics used against Appellant in an effort to restrict his rights to make sure he did not "win" under any circumstance."
>
> On the day of trial, upon Appellant's entry into the courtroom, Appellant informed the municipal judge that he and the prosecutor had conferred, did not reach any plea agreement[5], and that Appellant was ready for trial. (R. p.108; R. p. 34, lines 10-11). Without a request being made by either party, the municipal judge ordered the parties outside and led the parties into a small break room "closet" adjacent to the courtroom, where

he initiated further talks with the aim of reaching a plea agreement. (R. p. 62, lines 10-13; R. p. 54, lines 6-17). Appellant truly believes this was done so that he could be deprived of rights outside the view of others and forced to enter a plea deal with the prosecutor, and that such a nonpublic conducting of the plea hearing prejudiced the unrepresented Appellant, likely violating South Carolina Constitution Article 1 § 9. At one point in the discussions, while the prosecutor was explaining the differences between a negotiated plea and a prosecutorial recommendation, the municipal judge interjected into the talks between the prosecutor and Appellant, suggesting that the prosecutor change his offer to Appellant from a "negotiated plea" to a prosecutorial "recommendation." (R. p. 19, item "4"). Although the prosecutor did eventually offer Appellant a negotiated plea deal, the fact that the municipal judge had already stated that Appellant was exposed to jail time for speeding[6] and appeared to prefer that the prosecutor offer less favorable terms to Appellant, created the impression to Appellant, that the judge was hostile towards Appellant. At that time, in an effort to avoid angering the judge, Appellant entered further negotiations with the prosecutor.

Explaining further, the municipal judge's insistence on and participation in plea negotiations between the parties, was repetitive to the point of intimidating Appellant, and had the effect of coercing Appellant to accept a plea deal. (R. p. 35, lines 1-17; R. p. 54, lines 6-17). The judge's preliminary and repeated insistence was not simply an encouragement of Appellant to consult counsel or take some time to think things over, but rather an insistence that Appellant meet again with the prosecutor to negotiate terms. At least twice, when Appellant refused to accept a plea agreement and insisted on starting trial, he was "talked down" and resent, by the municipal judge, to negotiate with the prosecutor. In Appellant's view, the judge, prosecutor, and court personnel were creating a situation, or circumstance, which would manipulate Appellant into accepting a plea deal or going to jail for speeding. After being intimidated, off the record, in the small "closet", by a large-in-stature judge and multiple court officers,

Appellant was asked, "Has anyone threatened you or coerced you in any way to get you to plead guilty?" Notice that Appellant does not simply respond, "No." Appellant's response was, "No, just circumstances are tough. You know? But uh, no one--no one in particular threatened me or said anything." (R. p. 65, lines 8-11). In his response to the question posed, Appellant is referencing the intimidating circumstances described in this appeal. (R. p. 32, lines 8-12). Just because "no one in particular" directly threatened Appellant, does not mean that the court's officers did not create a threatening and intimidating circumstance, which unfairly prejudiced the unrepresented Appellant.

Consider (1) that though it was not his fault, it is still true that the municipal judge stood approximately 6' 8" tall and outweighed the 5' 11"Appellant by probably 80 pounds on October 28th, 2021, (2) that it was the judge alone who called for additional plea discussions, (3) that the judge twice refused to accept Appellant's decision to go to trial and NOT make a deal with the prosecutor, (4) that this pressuring to make a deal was done outside the presence of others while in a small "closet", and (5) that the recording of these events was not made and thus conveniently appear nowhere in the record, despite the clerk, who was present with a recorder in her hand, being told to make the record. (R. p. 62, lines 23-24; R. p. 35, line 23 - p. 36, line 11). Appellant truly needed the protection afforded by South Carolina Constitution Article 1 § 9 to ensure that the plea hearing was conducted in a way that was aboveboard. Appellant believes the record has been selectively made to avoid proof of the misstatement of penalties, intimidation, and coercion."

VI. THE "JUDGE'S NOTES" IS FULL OF ERRORS AND THE PLEA HEARING RECORD IS SELECTIVE AND MANIPULATED

Further, Appellant urges this Court to consider that the "Judge's Notes" included in the Municipal Return are clearly flawed and erroneous, and in places outright untrue. The Circuit Court relied on this part of the Return too heavily. Appellant notified this Court in his Final

Brief Of Appellant at p. 27-28, which states in part:

> "As explained to the circuit court judge, the municipal court's Return, especially the "Judge's Notes", contains outright misstatements of fact and gross errors, which either do not appear anywhere else in the record or are directly contradicted by the record. Even the things claimed to have been done in the "Judge's Notes" appear no where else in the record; as statements and notices claimed to have been made and given at items 1, 2, and 5 appear nowhere else in the record, while the claims at items 3, 4 and 8 are directly contradicted by the record."

As an example, see Final Brief Of Appellant at pp. 29-30, which states in part:

> "Item #8 of the "Judge's Notes" states that the judge ordered the prosecution to turn over all evidence to be used in it's case in chief and all exculpatory evidence. (R. p. 13, item "8"). This is incorrect. The municipal judge ruled against Appellant outright on this motion, by letter, without any further explanation. (R. p. 125; R. p. 39, line 16 - p. 40, line 3). This denial, as relates to exculpatory evidence is acknowledged by the prosecutor. (R. p. 48, line 15 – p. 49, line 5). Further still, the judge ruled against Appellant on Appellant's Motion To Reconsider his ruling on the Motion To Compel discovery."

The deficiencies in the municipal court record, many of which appear to be intentionally done, were addressed to this Court at pp. 26-27, which reads, in part:

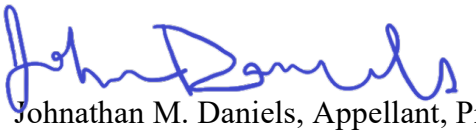
> "The record in this case is incomplete for reasons that Appellant believes are improper. As a consequence, many of the issues complained of by Appellant do not appear in the municipal record, however, it should be obvious from what is in the record that Appellant's pleas were not voluntarily, knowingly, and understandingly made.
>
> In Appellant's Notice Of Appeal, which was given to the

municipal court only 7 days after making the pleas, on November 4th, 2021, Appellant expressed his suspicion that the municipal record was manipulated to ensure that the misstatement of penalties made to Appellant, the municipal court's refusal to allow trial as was twice requested by Appellant, the municipal court's repeated insistence that Appellant negotiate with the prosecutor, and the municipal court's failure to inform the unrepresented Appellant of his rights and the waivers made in proffering the pleas, did not appear in the record. (R. p. 20, item "6"). Appellant's suspicions were realized as likely true upon his receipt of the audio record from the municipal clerk of court, nearly a year later, on August 25th, 2022. (R. p. 139, item "2"; R. p. 61, lines 3-15). Curiously, the audio files specific to the discussions complained of by Appellant captured no audio; however, the opening of court, the plea acceptance, sentencing, and jury dismissal, were all miraculously recorded; that is to say everything convenient to secure Appellant's conviction, was recorded. In total, 2 out of the 5 audio files captured no audio. Specifically, only the portions that would have captured the improprieties complained of by Appellant were not made. During all relevant discussions, the municipal court had assured Appellant that a record of the hearing was being made, but the record is incomplete. (R. p. 61, lines 3-15; R. p. 62, lines 21-24; R. p. 53, line 24 – p. 54, line 5). This circumstance pits Appellant's word directly against assertions made by the municipal judge in the "Judge's Notes" (R. p. 13), with no neutral record of what occurred available to this Court. Further, considering that Appellant claims repeated judicial

and prosecutorial coercion to negotiate a plea deal and manipulation of the record, any disagreements between the objective record and the "Judge's Notes" should have been weighed in favor of the available municipal transcript (R. pp. 60-71) and objective records."

Here, Appellant has demonstrated clearly and inarguably that his guilty pleas were unknowingly and involuntarily made. Respectfully, if this Court has not fully read and considered Appellant's Final and Reply Briefs, a great deal of judicial and prosecutorial mischief might go unnoticed. Appellant humbly asks that this Court toss out it's prior decision and rehear Appellant's appeal in full.

October 13, 2025



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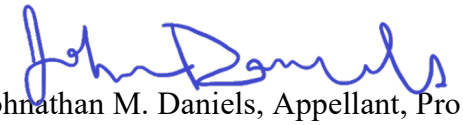
v.

The City of Cayce Respondent,

PROOF OF SERVICE

I certify that I have served the Petition For Rehearing, upon Respondent, by FIRST-CLASS MAIL, on October 14th, 2025, addressed to his attorneyof record, Danny C. Crowe; mailed to: Danny C. Crowe, CROWE LAFAVE GARFIELD & BAGLEY, LLC, 2019 Park Street, Columbia, South Carolina 29201.

October 13th, 2025



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