

March 26, 2026

Alonzo C. Jeter, III, #282902  
Kershaw Correctional Institution  
4848 Goldmine Hwy.  
Kershaw, South Carolina 29067

The Honorable Jenny A. Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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MAR 30 2026

SC Court of Appeals

RE: Alonzo C. Jeter, III v State of South Carolina, et al  
Appellate Case No. 2025-000762

Dear Ms. Kitchings:

Enclosed for filing, please find the (1) Pages 52 thru 58,  
(2) Page 530, ~~531~~ (3) Page 536 (which are intended to cure  
the deficiencies of the Record on Appeal), along with a Certificate.

Note: the deficiency is cured by providing blank pages as  
filler as the Record on Appeal does contain all designated  
matters intended to be included. There was a problem in copying services.

Please find also an additional copy of this cover letter and  
Certificate of Service along with a self-addressed stamped envelope.  
Please return to me, file-stamped copies of the same.

Thank you for your attention and understanding in this regard.

Sincerely,  
  
Alonzo C. Jeter, III

This motion is based upon the pleadings filed in this action and the applicable common and statutory law of the State of South Carolina. This motion may be supported by a memorandum of law prior to a hearing in this matter.

Respectfully Submitted,

HARLEY L. KIRKLAND  
ASSISTANT DEPUTY ATTORNEY GENERAL  
Office of the Attorney General  
SC Bar Number 100382  
PO Box 11549  
Columbia, SC 29211  
Phone: (803) 734-0406  
HKirkland@scag.gov

LEON DAVID LEGGETT  
ASSISTANT ATTORNEY GENERAL  
Office of the Attorney General  
SC Bar Number 104366  
PO Box 11549  
Columbia, SC 29211  
Phone: (803) 734-3177  
DavidLeggett@scag.gov

By: 

ATTORNEYS FOR CHELSEY MARTO, J.  
DERHAM COLE, J. MARK HAYES, II, RALPH  
KEITH KELLY, BRANDY W. MCBEE,  
TONNYA K. KOHN, JEAN HOEFER TOAL,  
AND DONALD BEATTY

MAY 2, 2024  
COLUMBIA, SOUTH CAROLINA

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58

Please do issue a subpoena or order which would allow me to in some ~~way~~ manner obtain a verbatim written document of the exact spoken words on these CDs. If a disposition is proper please issue this as well.

My attempts at completing my exhibit evidence in this case has been delayed due to:

- 1) My hardships as a prose, indigent, prisoner, litigant and the SCDC's constant refusals of providing me information based on the fact that I am a prisoner.
- 2) The lower court/PCL Court's unfairness and bias in not ~~providing~~ providing equitable time, opportunity, and assistance in completing my exhibit evidence. (See my motions filed in this court along with and subsequent to my Notice of Appeal and 243(c) Explanation.)

Thank you for your assistance in this matter.

Sincerely, 

Alton C. Jeter, III

Please  
Issue Subpoena for  
South Carolina Department of Corrections  
Office of General Counsel  
4444 Broad River Road  
Columbia, South Carolina 29221

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JUN 06 2022

S.C. SUPREME COURT 331/331

2008-10-06-01

  
535

# The Supreme Court of South Carolina

RE: Appointment of Counsel in  
Post-Conviction Relief Cases  
Before the Circuit Court

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## ADMINISTRATIVE ORDER

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In post-conviction relief (PCR) cases, the appointment of counsel is appropriate only when a hearing must be held. Rule 71.1, SCRCP ("If, after the State has filed its return, the application presents questions of law or fact which will require a hearing, the court shall promptly appoint counsel to assist the applicant if he is indigent."); Richardson v. State, 377 S.C. 103, 659 S.E.2d 493 (2008). I find that in many cases counsel are being appointed when the above standard has not been satisfied.

Further, in a significant number of these cases, the application is ultimately denied as being successive or as being barred by the statute of limitations. The appointment of counsel in such cases places an unnecessary burden on the appointed counsel, and violates the mandate of Rule 608(g), SCACR, that appointments should be minimized. To help address this problem, I find it appropriate to direct the following:

Consistent with Rule 71.1, SCRCP, counsel will not be appointed until the Post-Conviction Relief Section of the Attorney General's Office files its return to the application. In its return, the Attorney General's Office shall clearly state in the caption heading whether it requests that counsel be appointed for the applicant.

If the Attorney General requests the appointment of counsel, counsel shall be appointed for the applicant unless a circuit court judge determines that it is inappropriate to do so. The authority to make the appointments in these cases may be delegated to the Clerk of Court or some other official.

If the Attorney General opposes the appointment of counsel for an indigent applicant, counsel will only be appointed as follows:

(1) If the Attorney General asserts that the application is barred as being successive or as being untimely under the statute of limitations, [1] counsel will not be appointed except upon written order of the Chief Judge for Administrative Purposes for the Court of Common Pleas in the circuit. In these cases, the Chief Judge will insure that counsel is only appointed for an indigent applicant when the facts raise a material issue regarding the applicability of the rule forbidding successive applications or the statute of limitations. Cf. Gary v. State, 347 S.C. 627, 557 S.E.2d 662 (2001) (statute of limitations).

(2) In all other cases in which the State opposes the appointment of counsel, counsel will only be appointed upon written order of a circuit court judge under the standard contained in Rule 71.1, SCRCP.

IT IS SO ORDERED.

s/Jean H. Toal

JEAN H. TOAL  
CHIEF JUSTICE

Columbia, South Carolina  
October 6, 2008

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[1] S.C. Code Ann. § 17-27-45 (2003).



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MAR 30 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal From Richland County Court of Common Pleas  
The Honorable Kristi F. Curtis, Circuit Court Judge  
The Honorable Daniel Coble, Circuit Court Judge  
Circuit Case No. 2024-CP-40-01737

APPELLATE CASE No. 2025-000762


Alonzo C. Jeter, III, ----- APPELLANT,

State of South Carolina; Alan McCrory Wilken;  
Chelsey F. Manto; Joseph Derham Cole; Mark J.  
Hayes, II; Ralph Keith Kelly; Brandy W. McBee;  
Tonaya K. Kehn; Jean Hoeder Teal; Donald W.  
Beatty, -----

RESPONDENTS.

CERTIFICATE OF SERVICE

I, Alonzo C. Jeter, III, hereby certify that I have served copies of pages 52 thru 58, and pages 530 and 536, of the Record on Appeal on the respondents, by placing copies of the same inside of ~~sent~~ postage prepaid envelopes and by placing said envelopes in the hands of Kershaw Correctional Institution's mailroom personnel on this 26<sup>th</sup> day of March, 2026, for mailing via the U.S. mail, address as follows: James Emery Smith, Jr., Office of the Attorney General, PO Box 11549, Columbia SC 29211; L. David Leggett, Office of the Attorney General, PO Box 11549, Columbia, SC 29211. s/

  
Alonzo C. Jeter, III



FOREVER / USA

The Honorable Jerry A. Kittings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

SC Court of Appeals

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MAR 26 2026

KEFSHAW CI  
MAIL ROOM

Allen & Coker III, #282902  
Kershaw Correctional Institution  
4848 Goldmine Hwy.  
Kershaw, South Carolina 29067



DEPARTMENT OF CORRECTIONS HAS NEITHER  
CENSORED NOR SUSPECTED THIS ITEM. THEREFORE  
THE DEPARTMENT DOES NOT ASSUME RESPONSIBILITY  
OF ITS CONTENTS.

WARDEN  
KERSHAW CORRECTIONAL INSTITUTION  
S.C. DEPARTMENT OF CORRECTIONS