

STATE OF SOUTH CAROLINA
In The Court of Appeals

Appeal from Spartanburg County
Honorable R. Keith Kelly, Circuit Court Judge
Appellate Case No.: 2023-001693

THE STATE

RESPONDENT,

v. RECEIVED

APR 13 2026

SC Court of Appeals

IN RE
TIMOTHY J. MCKINNEY

APPELLANT.

ANDERS BRIEF

Timothy J. McKinney
Lieber Conn Zlot.
Post Office Box 205
Ridgewood, SC 29172
Appellant

S.C. Attorney General's Office
Rembert C. Dennis Building
Post Office Box 11549
Columbia, SC 29211
Respondent.

ISSUES ON APPEAL

- 1) WHETHER THE FOURTEENTH AMENDMENT GUARANTEES A CRIMINAL APPELLANT THE RIGHT TO COUNSEL IN HIS FIRST APPEAL AS OF RIGHT?

- 2) WHETHER THE ADEQUACY OF EVIDENCE BEFORE THE TRIAL COURT SATISFY PROBABLE CAUSE STANDARD OF PROOF TO PERMIT SELECTIVE PROSECUTION?

- Whether the Fourteenth Amendment guarantees a criminal appellant the right to counsel in his first appeal as of right?

The Appellant Timothy J. Melaney, now before this Court, seeks the Court's full review under the safeguards of the Fourteenth Amendment, due process of law and equal protection that guarantees a criminal appellant the right to counsel in his first appeal as of right constituting a remedy to review this brief by response of Appellant-United States vs Chronic, 466 U.S. 648.

ARGUMENT

The Appellant was given incompetent advice by Appellate Counsel David Alexander that concealed the appellate court's review and the procedure that is available once defense counsel files an Anders Brief. The Appellant was not informed of the Appellate process nor the reasons as to why the Anders Brief was being filed.

DISCUSSION

On January 06, 2026, Appellant wrote the Division of Appellate Defense concerning the duration of the filing of appeal and the submission of the brief by former Appellate Attorney the late Bob Dadek, that the South Carolina Commission on Indigent Defense (SCCID) has his

his case file since October 24, 2023, and no one from the Division of Appellate Defense communicated how to proceed before this Honorable Court to review constitutional violations and prejudice on non-frivolous claims.

On January 14, 2026, Appellate Attorney David Alexander, replied by a sincere and passionate respect to the late Bob Dicks, but failed to address the legal issues now presented to this Court that is ripe for review. *Evitts v. Lucey*, 469 U.S. 387, 397, 105 S.Ct. 830.

LAW AND ANALYSIS

"When defense Counsel files a Anders Brief and petitions to be relieved as counsel, the role of the appellate Court is to review the brief submitted by counsel, any pro se response submitted by the appellant, and the record on appeal to determine whether the appeal contains any issues of arguable merit." *State vs. Lyle*, 381 S.C. 442, (73 S.E. 2d 871).

Appellant asks the Court to respectfully take judicial notice that the submittance of these two (2) legal correspondences by Appellate Counsel David Alexander lacked any whatsoever notification of petition to be relieved as counsel of record nor the advisement of a timeframe to submit a pro se brief in response to review any issues of arguable merit or how to preserve issues of formulation of discovery during the appellate review as the Court considers

the whole and entire record on appeal. These omissions by Sir David Alexander, Esquire, Attorney at Law, and the late Robert Dudek filing on the Court demonstrated there was no conscientious investigation after being convinced the appeal is frivolous.

The Appellant aver that the filing of an Anders Brief must be considered "Special and Important" as factors of the appeal to survive frivolous claim. *Anders v. California*, 386 U.S. 738, 87 S.Ct. 1396, 18 L.Ed.2d 493. Counsel Robert "Bob" Dudek was not convinced that the appeal was frivolous nor did the Division of Appellate Defense because in the pursuit of due diligence possible grounds of appeal is plain within the trial transcript that trial errors were apparent *in prima facie* established.

The Appellant aver further that Sir David Alexander was not convinced that the appeal was frivolous upon not withdrawing from the case, but failed to conduct an conscientious investigation on the account of trial court objections and stipulations not shared with the Appellant or the driving force unbeknownst aware that compels an attorney to evaluate the case on the basis of incompetent and inadmissible evidence after a selective prosecution conviction.

The Appellant respectfully ask the Court to consider the Appellant Initial Brief submitted by Bob Dulek, Supplemental Brief submitted by Appellant, and Anders brief submitted by Appellant to determine whether the appeal contains any issues of arguable merit.

In Accordance to *Orde v. Lyles*, 381 S.C. 442, 673 S.E. 2d 811, "if an issue is found which has arguable merit the appellate court will direct the parties to file merit briefs, and the case will proceed under the normal appellate process, but if no issues of arguable merit are found by the appellate court, the appeal is dismissed, and the appellant's counsel is retrieved."

"If the Court is satisfied that counsel has diligently investigated the possible grounds of appeal and agrees with counsel's evaluation of the case, then leave to withdraw may be allowed and leave to appeal may be denied." *Ellis v. U.S.*, 78 S.Ct. 974.

The Appellant submits before the Court that he was constructively denied effective assistance of appellate counsel for his direct appeal. The Appellant should not be held responsible and suffer any procedurally defaulted claims that appellate counsel was ineffective for failing to raise ineffective assistance of trial counsel on direct appeal, selective prosecution, malicious prosecution of the underlying claim of prosecutorial misconduct, and trial judge abuse of discretion.

How can the Appellate Counsel Hodge a case without first meeting with the State's prosecution to obtain files and evidence nor consult with the Appellant to explained the law or appellate process to protect Appellant's interest to a claim of actual innocence upon getting consent to file and initial and reply brief?

The Appellant aver that the appellate counsel of record did not act with good faith upon representation because to not force the prosecutor to disclose the police files under penalty of excluding as evidence the information contained therein imposes the question whether the trier of fact was deprived, the jurors, to call into question the timethe of murder and the presence or absence of Appellant of the scene of crime in question.

MERITS

The Appellant directs the Court's attention that these errors raised are not subject to the Strickland prejudice analysis or Chapman harmless error analysis to survive an Anders Brief Review. See *McCoy v. Court of Appeals of Wisconsin*, 486 U.S. 429, 108 S.Ct. 1825, 100 L.Ed. 2d 400 (1988); see also *Penson v. Ohio*, 488 U.S. 75, 109 S.Ct. 346, 102 L.Ed. 2d 300 (1988).

The United States Supreme Court explained in *McCoy*, "to satisfy federal constitutional concerns, an appellate Court faces two (2) interrelated

lets as it rules on counsel's motion to withdraw. First, it must satisfy itself that the attorney has provided the client with a diligent and thorough search of the record for any arguable claim that might support the client's appeal. Second, it must determine whether counsel has correctly concluded that the appeal is frivolous.

In this case, there is no record at least any provided notification of any submitted motion to withdraw other than the Anders brief submittance of appellate counsel withdrawal. The Anders brief is designed both to provide the appellate courts with a basis for determining whether appointed counsel have fully performed their duty to support their clients' appeal to the best of their ability and also to help the Court make the criminal determination whether the appeal is indeed so frivolous that counsel should be permitted to withdraw. *McCoy*, supra, 108 S.Ct. 1895.

The Appellate Counsel for Appellant failed to demonstrate that counsel in fact conducted the required detailed review of the case and that the appeal is indeed so frivolous that it may be decided without an adversary presentation. The Appellant addresses the issue presented cause to arrest is not one that 'can necessarily be characterized as frivolous?' *Ellis v. United States*, 356 U.S. 674, 78 S.Ct. 974, 975, 2 L.Ed. 2d 2060 (1958).

The very presence of a lack of proof to demonstrate that currently Appellate Attorney David Alexander submitted proof of facts of a) conscientious investigation is ~~heretofore~~ because after the case was conferred to him, he operated under the coercion without rendering any whatsoever assistance due the Appellant under the Sixth Amendment of the United States Constitution *see* S.C. Const. Art. I, § 14. Meanwhile, the Appellant proffer proof that he was in fact denied assistance from Dr. David Alexander. *See* South Carolina Appellate Court Rules, Rule 602(c)(1).

- Whether the legal adequacy of evidence before the trial Court satisfy probable cause standard of proof to permit selective prosecution?

The Appellant Timothy J. McKinney was wrongfully apprehended and arrested for the allegedly cause of death of Travis Scott McCall based upon an incomplete and botched investigation.

The Appellant was disturbed upon the notion of being a victim of illegal interceptions of video surveillance that procure illegal electronic surveillance arising from domestic relations that were independent from a criminal investigation and used by law enforcement to prosecute Appellant.

The Appellant aver that law enforcement relied (relied) upon eavesdropping surveillance that was inadmissible at trial and prejudicial to the effects of not capturing Appellant dragging a body, nor a carpet during the viewing of the video surveillance proffer at his trial.

The Appellant raises the fact and factors why the Court should consider the ground for the State's prosecution failure to establish probable cause and rule against the respondents reversing the judgment and conviction of Appellant Timothy J. McKinney.

The Appellant directs the Court's attention to the fact why Amanda Richards's husband bought and purchased a surveillance system to spy not only on Amanda Richards for marital affairs, but also on its neighbors. This

system capabilities provided access from a Strategic placed location to eaves drop on its neighbors to spying upon or invading the privacy of persons spied upon and any other conduct of a similar nature, that leads to invade the Appellant's privacy. See South Carolina Code Annotated Article 8/16-17-40 (A).

The Appellant asserts to have witnessed Amanda Richards in the act of adultery with a local Spartanburg police officer and was provided details on Mrs. Richards secrecy. Nonetheless, the last issue is the surveillance was admitted as State's Exhibits 1 and 2; Tr. Tran. pg. no. 127 Ln 3-14, in which was used to prosecute the Appellant and tempt the jurors considered to be impartial.

The Appellant aver that the tactical strategies of the prosecution tailored the videosurveillance to selective prosecute Appellant and a malicious prosecution ensued after knowing Appellant was unfairly treated without the affords of equal protection of laws that deprived Appellant of liberty, when the State had three (3) D.N.A. Profiles while seeking Appellant of interest in the course of discarding one of two of the D.N.A. Profiles concluded the incomplete investigation.

Although Amende Richards submitted to the trial court to having a video recording system while admitting to cover dropping, Trs Tran pg. no. 126 Ln 17-24, and provided access to law enforcement, State's Exhibit 1 and 2; Trs Tran pg. no. 124 Ln 3-14, presents a issue of relevancy while Appellant attacks its admissibility and veracity. The probative force suggests Gitches of a shadow for mere presence without more direct evidence to show Appellant tampered with a corpse let alone in the worst case scenario dragging a dead body of Travis McGill to a partner.

ARGUMENT

The legal adequacy of evidence before the trial court surmounted to a prosecution that was selective and malicious without cause to arrest. The trial court did not avail itself of the probable cause standard of proof to permit selective prosecution and secure a conviction based on a(n) illegal sentence.

LAW AND ANALYSIS

"All proceedings before magistrates in criminal cases shall be commenced on information under oath, plainly and substantially setting forth the offense charged, upon which, and only which, shall a warrant of arrest issue." S. C. Code Ann. § 22-3-710 (1989). "A warrant affidavit that is

'insufficient in itself to establish probable cause may be supplemented before a magistrate by sworn oral testimony.' *State v. Crane*, 296 P.C. 336, 338, 372 S.E.2d 587, 588 (1988).

DISCUSSION

The facts known to the magistrate at the time of the probable cause determination was not included information from the affidavits nor from sworn oral or written testimony. The first responders admitted within the trial transcript that upon arrival Spartanburg deputies and officers did not know whether it was a homicide and killing, See Tr. Tran pg. no(s) 89 Ln 1-18, or wicked jacking.

The Appellant was arrested after Detective Jon M. Quest sworn upon an oath that Timothy J. McKinney did with malice aforethought, cause the death of Travis McCall based on police investigation. See Arrest Warrant No. : 2021 A 42 101012 74.

The fundamental issue in determining the lawfulness of an arrest is whether there was probable cause to make the arrest. See *Crist v. Berkeley County Sheriff's Department*, 336 P.C. 611, 521 S.E. 2d 163, at 165. Probable cause is defined as a good faith belief that a person is guilty of a crime when this belief rests on such grounds as would induce an ordinarily prudent

and cautious man, under the circumstances, to believe *Atwood v. Jones*
v. City of Columbia, 301 S.E. 62, 389 S.E. 2d 662, at 665.

The Appellant does not waive his right for a jury to consider and question whether probable cause exists. The Appellant asserts further that no ordinarily prudent and cautious man under the circumstances, to believe arrest was imminent of the Appellant without establishing first was there an investigation ongoing during the illegal breach into Appellant's father Joe McKinney Residential Home while apprehending Appellant on the front porch without miranda warning. The Appellant was not freely to leave nor enter the residential home of Joe McKinney prior to a search warrant. This restraint was intentional and unlawful.

The Appellant satisfies his burden of presenting colorable issues to determine whether the appeal contains any issues of arguable merit. The Appellant is of the belief that his appellate counsel of record subsequently withdrawn via an Anders Brief and failed to mention any arguable issues of appeal. The lawful point to withdraw and leave Appellant to his own defense of Actual Innocence while challenging the wisdom of judges on this panel was unethical and incompetent representation for his defense.

MERITS

The Appellant raised that the search to the Appellant's dad Joe McKinney residential home upon entry by the detectives was illegal, involuntary and coerced. The Appellant avers that the "plain clothes" detectives at the early on stages of investigation the crime scene near the ranks, showed up at the Levas Poores residence in Enoree, S.C., under the guise of "permission by walk through", a run of the mill deception tactic knowing fully that the Appellant was their prime suspect.

The Detective names was later discovered at trial by Steady on the record who they were. The Appellant did not know the names of these officers until trial. Detective Tom Guest and Zsach Parham gave a hard base line to enter the residence of Joe McKinney without regard of a search warrant while apprehending Appellant on the front porch of his dad's home.

The Appellant provided the Court with accurate information on the day of Apprehension. The Appellant was not allowed to leave the premises nor were permitted to enter into the residence of Joe McKinney. For trial counsel to not move to suppress or motion in limine to restrict the fruits of this search is clear in dicta of *Frank v. Delaware*,

evidentiary issues that gives the Court cause. The inherent power to suppress and exclude evidence based on the theory of "fruits from poisonous tree" - *id.*, *Franks v Delaware*, 438 U.S. 154, 171, 98 S.Ct. 2674, 57 L.Ed. 2d 667 (1978).

In accordance to *Pate v Lynch*, 412 S.C. 156, 771 S.E. 2d 346, "to be entitled to a *Franks* hearing for an alleged omission, the challenger must make a preliminary showing that the information in question was omitted with the intent to make, or in reckless disregard of whether it made, the affidavit misleading to the issuing judge. There will be no *Franks* violation if the affidavit, including the omitted data, still contains sufficient information to establish probable cause."

Nevertheless, *Franks* addressed an act of commission in which false information had been included in the warrant affidavit. However, the *Franks* test also applies to acts of omission in which exculpatory material is left out of the affidavit.

The Appellant has standing on the entitlement to a *Franks* hearing because on the legal premise of establishing probable cause that differs with the information available both to the magistrate that was not supplemented or changed and the trial court for failure to include a matter

that might be construed as excusatory.

The Franks Healy is appropriate and on-affidants material perjury or recklessness is established by a preponderance of the evidence. The warrant 'must be voided' and evidence or testimony gathered pursuant to it must be excluded. *ibid.*

The Appellant does not confuse the Court and clarify what issues are identified and presented to this Court. The Appellant presented a colorable claim of cause to arrest is not frivolous, appellate counsel did not conduct a(n) conscientious investigation, appellate counsel's withdrawal was unsatisfactory, and selective prosecution.

Although the issue of ineffective assistance of counsel is not reviewable under this forum, it does not satisfy the prejudicial effects bar cause on clearly established Federal law, *Murray v. Carrier*, 477 U.S. 478, 106 S.Ct. 2639, 91 L.Ed. 2d 397, Standard still applies. Thus, sandbagging non-frivolous claims must not be concealed, but, preserved at the first initial appeal for habeas corpus review and exhaustion principles, 28 U.S.C. § 2254; and Post-Conviction Relief Proceedings, § 17-27-10 et seq.

WHEREFORE UPON, the Appellant Timothy J. McKinney asks respectfully to grant this Anders Brief and rule in favor of Appellant against the Respondents.

Done This 07th Day of April, 2026.
Respectfully Submitted,

/s/ Timothy McKinney
Timothy J. McKinney
SCDCA 287844

APPENDIX

B.(A)



SCCID

SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

Division of Appellate Defense
1330 Lady Street, Suite 401
Columbia, South Carolina 29201-3332
Post Office Box 11589
Columbia, South Carolina 29211-1589
Telephone:(803) 734-1330
Facsimile:(803) 734-1397

Wanda H. Carter, Chief Appellate Defender

January 14, 2026

Timothy J. McKinney 287844
Lieber Correctional Institution
Post Office Box 205
Ridgeville, SC 29472

Re: Your Case

Dear Mr. McKinney:

This letter is in response to your letter dated January 6, 2026, that I received today. It is incorrect to say you have heard nothing from this Office since it assumed representation of you. Your former attorney who passed away, Bob Dudek, wrote to you informing you he was representing you and sent you a copy of the Anders brief he filed. I wrote to you in July 2025 informing you I was taking over your case. At that point everything had been filed by Mr. Dudek, one of the finest appellate lawyers in the history of South Carolina, and we were waiting on the Court. I explained this to you in a letter in July 2025 and again in December 2025. I also explained that I was not going to get your Rule 5 discovery and told you that you must get it from your trial attorney.

Ineffective assistance of trial counsel cannot be raised on direct appeal in South Carolina and must be raised in a PCR after your appeal is over. You can also raise ineffective assistance of appellate counsel in a PCR. As I have explained about the Anders procedure, the Court conducts its own independent review of the record to see if Mr. Dudek missed anything. Your standard of review question is, therefore, impossible to answer about speculative errors the Court might find. I see no need for an in-person visit and will not be scheduling one unless something changes in your case to require it. You are free to call me collect at 803-734-1330 at any time without an appointment. The best time to reach me is in the afternoons after 3:00pm.

Sincerely,



David Alexander



SCCID

SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

Division of Appellate Defense
1330 Lady Street, Suite 401
Columbia, South Carolina 29201-3332
Post Office Box 11589
Columbia, South Carolina 29211-1589
Telephone: (803) 734-1330
Facsimile: (803) 734-1397

Wanda H. Carter, Chief Appellate Defender

March 30, 2026


Timothy J. McKinney 287844
Lieber Correctional Institution -
Post Office Box 205
Ridgeville, SC 29472

Re: Your Case

Dear Mr. McKinney:

First of all, I have no conflict of interest in your case. Our office routinely reassigns cases when an attorney leaves. My picking up a case that another attorney already performed the work on in no way creates a conflict of interest. Second, South Carolina does not have plain error. South Carolina's error preservation rules are among the most strict in the United States. The mistakes made by your trial lawyer will have to be litigated in a post-conviction relief action. You may also raise claims in a PCR that I or Mr. Dudek was ineffective. The Court is conducting its Anders review and I encourage you to send anything to the Court that you want the Court to consider.

Sincerely,



David Alexander

DAA/dwb

8

EXHIBIT A

FOR LEGAL USE ONLY

R21

22

ARREST WARRANT

2021A4210101274

STATE OF SOUTH CAROLINA

County/ Municipality of

Spartanburg

THE STATE

against,

21051727

Timothy Joseph McKinney

Address:

Phone:

Sex: M Race: W Height: 5 10 Weight: 190

DL State: SC DL#:

DOB: Agency ORI #: SC042000

Prosecuting Agency: Spartanburg County Sheriff

Prosecuting Officer: Jon M Guest - 0691

Offense: Murder / Murder

Offense Code: 0116

Code/Ordinance Sec: 16-03-0010

This warrant is CERTIFIED FOR SERVICE

County/ Municipality of

The accused is to be arrested and brought before me to be dealt with according to the law.

(L.S.)

Signature of Judge

Date:

RETURN

A copy of this arrest warrant was delivered to defendant on McKinney, Timothy 6-3-21

S. Lovatt
Signature of Constable/Law Enforcement Officer

RETURN WARRANT TO:

General Sessions
180 Magnolia Street
P O Box 3483
Spartanburg, SC 29303

ORIGINAL

ORIGINAL

STATE OF SOUTH CAROLINA Page 447 of 447.)

County/ Municipality of

Spartanburg

Personally appeared before me the affiant Jon M. Guest

being duly sworn deposes and says that defendant Timothy Joseph McKinney

did within this county and state on or about 5/30/2021

State of South Carolina (or ordinance of County/ Municipality of

Spartanburg

in the following particulars:
DESCRIPTION OF OFFENSE: Murder / Murder

I further state that there is probable cause to believe that the defendant named above did commit the crime set forth and that probable cause is based on the following facts:

That between May 30, 2021 and May 31, 2021 in the county of Spartanburg, one Timothy Joseph McKinney did with malice aforethought, cause the death of victim, Travis Scott Meall by cutting about the neck and strangling the victim. Warrant based upon police investigation. DMS

Signature of Affiant

STATE OF SOUTH CAROLINA
 County/ Municipality of

Spartanburg

Address: 6043 Howard Street

Spartanburg 29303-

Affiant's Telephone: (864)503-4500

ARREST WARRANT

TO ANY LAW ENFORCEMENT OFFICER OF THIS STATE OR MUNICIPALITY OR ANY CONSTABLE OF THIS COUNTY:

It appearing from the above affidavit that there are reasonable grounds to believe,

on or about 5/30/2021 / defendant Timothy Joseph McKinney

did violate the criminal laws of the State of South Carolina (or ordinance of

County/ Municipality of Spartanburg

) as set forth below:

DESCRIPTION OF OFFENSE: Murder / Murder

Having found probable cause and the above affiant having sworn before me, you are empowered and directed to arrest the said defendant and bring him or her before me forthwith to be dealt with according to law. A copy of this Arrest Warrant shall be delivered to the defendant at the time of its execution, or as soon thereafter as is practicable

Sworn to and subscribed before me

on 6/3/2021

Signature of Judge
David James Turpin (L.S.)

Judge Code: 5079

Judge's Address: Spartanburg County Judicial Center

Spartanburg, SC 29306-2335

Judge's Telephone: (864)596-2564

Issuing Court: Magistrate

Municipal

Circuit

ORIGINAL

ORIGINAL

ORIGINAL

ORIGINAL

ORIGINAL

AFFIDAVIT

ORIGINAL

Form Approved by
S.C. Attorney General
April 21, 2003
SCCA518

who

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CLERK OF COURT
SPARTANBURG COUNTY
SOUTH CAROLINA

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STATE OF SOUTH CAROLINA
In The Court of Appeals

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APR 13 2026

Appeal From Spartanburg County
Honorable R. Keith Kelly, Circuit Court Judge
Appellate Case No. : 2023-001693

SC Court of Appeals

The State,

Respondent,

v.

In re Timothy J. McKinney,

Appellant.

PROOF OF SERVICE

I, Timothy J. McKinney, certify that on this 08th Day of April, 2026, served the Appellant's Attorney of Record Sir David Alexander, at South Carolina Commission of Indigent Defense, Division of Appellate Defense, 1300 Lady Street, Suite 401, Columbia, SC 29201-3332, and The Clerk of This Court Jenny Abbott Kitching, at Post Office Box 11629, Columbia, SC 29211, by depositing a true copy of the same in the internal mailing system at Lieber Correctional Institution. First-Class postage is either being pre-paid and prepared by me or Lieber mailroom personnel on my behalf.

1st Timothy McKinney
Timothy J. McKinney #287849
Lieber Corr Inst
Post Office Box 2023
Ridgewood, SC 29422

Timothy J. McKinney
SC Det # 287844
Lieber Correctional Institution
Post Office Box 205
Lafayette, SC 29472

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APR 13 2026

SC Court of Appeals

April 07, 2026

South Carolina Court of Appeals
Office of The Clerk
1015 Sumter Street
Post Office Box 11629
Columbia, SC 29211

Re: *The State of South Carolina v. Timothy J. McKinney*
Appellate Case No. : 2023-00693

Dear Madam Kitchens:

PLEASE WILL THIS OFFICE AND COURT TAKE NOTICE,
of the submittence of Anders Brief enclosed. I request that the Court
be informed of the ex parte communication and the clerk's office file the
the enclosed brief and exhibits

Furthermore, upon Counsel Sir David Alexander has instructed
me to file any additional information to the Court for panel review. I
thank you in advance for your cooperation and service.

Yours Truly,

Timothy McKinney
Timothy J. McKinney

Timothy J. Mc Kinney # 287 844
LEA - Max A # 107
Lieber Correctional Institution
Post Office Box 205
Ridgewood, SC 29472

RECEIVED

APR 13 2026

SC Court of Appeals

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APR 09 2025

MAIL ROOM
LIEBER C.I.

Clerk Terry Abbott-Kitching
South Carolina Court of Appeals
Office of the Clerk
1015 Pump Street
Post Office Box 11629
Columbia SC 29211