

The SOUTH CAROLINA COURT OF APPEALS

Robert Graham Jr., # 178039, Appellant,
Mar 16, 2026.

10/25
3-26
2026

v. South Carolina Department of Corrections,
Respondent.

Re: Pending motion in A COURT OF DER
of counsel, motion supplement record,
now Affidavit in support of...

RECEIVED
APR 20 2026

C/A No. 2025-002411

SC Court of Appeals

Memorandum of

Declaration/Ver-
ification

(LAW),
Dear Hon. Jasmine D. Smith, 28 U.S.C. A 244b

Herewith consistent - with proper motions /
filed pending before this court. on for about
mar 15, 2026, I submitted notice - motion
to supplement the record - under extradi-
nary, unusual circumstances, due to know
fault of appellant for appointment of
counsel. Finally, on mar 15 2026. Let

Johnson under the "Security camera."
gave appellant his legal mail from
this court which she had in her
possession since - Monday 12, 2026.

Please kindly, return appellants
copies of same. Truly yours,
1st [Signature]

STATEMENT OF FACTS

20/20/24

This honorable court pursuant to motion, affidavits per, the entire record of this case from Sept 2025 - to now Mar 16, 2026. Where appellant has suffered egregious, collusive, tactical, calculated nonprocedural penal abuse of power discretion. Controlling laws prohibits, protects the liberty interest of appellants "free speech" fundamental access to and from this court without reprisal, retaliation, see, South Eastern Site Prep, LLC v. Atlantic Coast Builders and Contractors, LLC

procedural history

The motions pending before this court reflects and "proffers" the same retaliation, reprisal from the grievance administrative process - from party conviction - where the court of administration decline to rule according to law and facts of appellants appeal. Simply by saying, it had no jurisdiction, contrary to Art 1 section 22.

Standard of Review

Appellant does not shed such fundamental intervention - from the criminal
mentality of SDC employees, basic First
Amendment rights at the front gate herein
after referred to as (BRCT), Broad River
correctional institutions from unlawful de-
tainment, unlawful preventing him from
basic rights by allowing employees, non
certified at that to have his legal mail
in her possession being Lit. Johnson,
moreover - purposely holding it beyond
SDC on policy for allotted time to give
appellant his "legal mail" note. Coffin v.
Reichard, 143 F.2d 443, 445 (CA-6, 1944)

Thus not only is appointment of counsel
mandatory to secure appellants protected
secured due-process 14th Amendment rights
to be granted. Emergency evidentiary
hearing fully reviewing the record and
scope of appellants' claims for redress.
Deposing camera pursuant to deposition
SCACR, Rules of Discovery etc

16-2018
5013
B

28. U. S. C. A 174b
I ~~will not~~ ~~write~~ present personal affairs
w/it's under the penalties of perjury
personal hands on knowledge, belief,
experience and the claims are correct
and true (Verbatim) under SOUND MIND.

Copies of same forwarded to beneath
(Party's), caused to be served from (REC'D)
(Appellate court)

Clark
South Carolina Appellate Court
Jasmon D. Smith
POST OFFICE Box 11629
COLUMBIA, SOUTH CAROLINA
29211

(SCDC)
Christina Byrd
4444 Broad Road
Columbia SC
29211

PLS SAYS
3-16-2018
(mailed)

Memorandum OF LAW

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569 F.2d 208 United States Court of

Appeals 4th Circuit, obstructing correspondence i.e., appellants legal mail: Violation of 18 U.S.C. A 1702 United States v. Ashford, 530 F.2d 792, 795 C 8 Cir 1976 18. U.S.C. A 1702 in pertinent part: (whoever) takes any letter or unauthorized depository, custody of any mail-room carrier, person to whom it was directed, with the sign to obstruct the correspondence or pry into the business or secrets of another opens shall be fined not more than \$2000 or imprisoned not more than five years or both the language i.e., meaning in Shall

wording can constitute mandatory amount v. post master General of U.S. 2d 398, Key 2, The use of mail system is just as much part of "free speech" as the appellants right to use his tongue. U.S.C.A. Const. Amend. 1

Tru Lock v. French 275 F.3d

405 4th circuit decided FRCP, SCACR, 12 (a) Allegations beyond mere speculation, conjecture, conclusion, survive the previous test when a Affidavit is attached under penalty of perjury personal knowledge understood in mind. Hence, irreparable damages will incur.

IT IS SO MOTIONED
By Robert G. ... 3-16-2026

Mr. Robert Graham #178039
BROAD RIVER CORRECTIONAL ROAD
4460 BROAD RIVER
COLUMBIA, SC



FOREVER / USA

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APR 20 2026

SC Court of Appeals

South (C) (K)
Carolina court of Appeals

Jenny A BOTT Ketchum
Post OFFICE Box 11629
COLUMBIA, SC

Handwritten signature/initials

2921181629 8012

