

STATE

COURT OF GENERAL SESSIONS

OLONEE COUNTY

TENTH CIRCUIT

STATE OF SOUTH CAROLINA }

COUNTY OF OLONEE }

STATE OF SOUTH CAROLINA }

PLAINTIFF }

VS }

DOYLE EUGENE MCCALL, JR. }

DEFENDANT }

WARRANT NO: 2023A3720400239

TRAFF METH/CRACK 10G But < 28G

3RD

SC Code § 44-53-375(c)

CDR Code 0452

TC1

DEFENDANT'S BRIEF FOR APPEAL

RECEIVED

JUL 15 2026

SC Court of Appeals

THIS DOCUMENT IS TO SERVE AS THE DEFENDANT'S BRIEF FOR APPEAL.

The above named Defendant files this APPEAL for the following Reasons:

- ① Ineffective Assistance of Counsel - The Defendant requested a jury trial and the Jury was picked; however, the Defendant was advised by his Counsel, Assistant Public Defender Amanda M. Surles, to accept a PLEA bargain before the trial could proceed, against the Defendant's desire. He took the advice of Counsel and entered a plea of guilty.
- ② The Defendant is not guilty of the charges, for he did not knowingly possess Meth in actual possession or constructive possession. The Defendant had no idea that Meth was in his vehicle.
- ③ The Defendant was tried in his absence previously for this same charge by Jury and resulted in Hung Jury. The Defendant requested a JURY TRIAL.
- ④ The Defendant has never been charged with TRAFF METH/CRACK 10G But < 28G. So the Charge of 3RD is inappropriate for this case. This is an error in law.
- ⑤ These are the Grounds of the Defendant's Appeal. The Defendant request the appointment of an Appellate Attorney to represent him in this APPEAL.
- ⑥ The Defendant Declares that all the statements presented are true and accurate under penalty of perjury.

SIGN: Doyle McCall

DATE: JULY 11, 2026

DOYLE EUGENE MCCALL JR. # 401430 F3B-154A COLUMBIA SC 290

Kirkland Reception and Evaluation

4344 Broad River Road

Columbia, SC 29210

13 JUL 2026 PM 3



US POSTAGE ® PITNEY BOWES



ZIP 29210 \$ 000.78⁰
02 4W
0000378357 JUL 13 2026

RECEIVED

JUL 15 2026

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, The SC. COURT OF APPEALS

P.O. Box 11629

Columbia, SC 29211

SC
RECEIVED

JUL 30 2026

JUL 13 2026

MAILROOM

Kirkland REE Co

Mail Room

29211-162929

