

State of South Carolina  
In the Supreme Court,

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SEP 25 2014

S.C. SUPREME COURT

SHANNON MCGEE, Petitioner,  
v. #147120

Motion to Amend

State of South Carolina, Respondent,

Appellate Case # 2014-000297

Johnson Petition for Writ CERTIORARI

Now comes the Applicant in the above-captioned writ certiorari matter acting by and through his undersigned counsel, giving notice to amend to his Johnson petition dated September 4<sup>th</sup> 2014 before Hon Steven H. Johnson, presiding judge.

In his Amendment to application for writ Certiorari, the Applicant alleged that the Assistant Solicitor Robert Bryan, along with Hon Judge Roger L. Couch both engaged in criminal conspiracy to obtain a guilty verdict against him.

1. Both Solicitor and trial judge should be charged with prejudice and criminal conspiracy.
2. The trial judge allowed the Solicitor to mislead the jurors with false information of the charges in which my lawyer should have motion the court for a direct verdict. And witness testimony

I. Criminal conspiracy is defined as "a combination between two or more persons for the purpose of accomplishing an unlawful object or a lawful object by unlawful means." S.C. Code Ann § 16-17-410 (2003). "The essence of a conspiracy is the agreement." State v. Backman, 347 S.C. 316, 323, 555 S.E 2d 402, 405 (2001). "Often proof of conspiracy is necessarily by circumstantial evidence alone." State v. Miller, 223 S.C. 128, 133, 74 S.E 2d 402, 405 582, 585 (1953)

9-19-14

Nevertheless, the law calls for an objective, rather than subjective, test in determining the existence of a conspiracy. "The gravamen of the offense of conspiracy is the agreement or combination." Gunn 313 S.C., at 134, 437 S.E.2d at 80; see also State v. Condey, 349 S.C. 184, 193, 562 S.E.2d 320, 324 (Ct. App. 2002) (stating the crime of conspiracy "consist of the agreement or mutual understanding.")

II. False information is perjury and both Solicitor and judge created sham legal process among the court and they both should have charges brought upon them. being that they're law official of the court, they both deprived me of life and liberty. And violated my 8th and 14th Amendment right. And that should grant me a new trial itself. Or vacate my sentence with prejudice

Please Check and Stamp  
And send me a copy  
back.

Shannon McCabe  
Shannon McCabe #147120  
9-18-14

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Shannon D. McGEE # 147/20

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