

State of South Carolina
In The Court of Appeals

Appeal From Greenville County
Court of General Sessions

The Honorable Letitia H. Verdin
Circuit Court Judge

Appellate Case No: 2013-000919

The State of South Carolina, -- Respondent,
vs.
Nathaniel Glenn, Jr., ----- Defendant.

Record On Appeal

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AUG 21 2014

SC Court of Appeals

Nathaniel Glenn, Jr.
Lee C.I.
990 Wisacky Hwy.
Bishopville, S.C. 29010

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STATE OF SOUTH CAROLINA)
)
 COUNTY OF GREENVILLE)
)
 The State of South Carolina,)
)
 v.)
)
 Nathaniel Glenn,)
)
 Defendant)

IN THE COURT OF GENERAL SESSIONS
 THIRTEENTH JUDICIAL CIRCUIT


2002-GS-23-6529

ORDER DENYING DEFENDANT'S
 MOTION FOR A NEW TRIAL

2013 APR 19 AM 11:36
 CLERK
 COURT
 GREENVILLE

THIS MATTER is before the Court on Defendant's motion for a new trial. Defendant's motion is made pursuant to Rule 60 of the South Carolina Rules of Civil Procedure. This Court finds that a motion made pursuant to Rule 60 is not the appropriate avenue for appeal as it applies to civil cases. The Defendant argues that evidence admitted at trial was tainted and that he should be granted a new trial pursuant to Rule 29 of the South Carolina Rules of Criminal Procedure. However, Rule 29 provides a basis for a new trial only when dispositive evidence has been discovered after a trial. The evidence in question in this case was admitted at trial. Further, Defendant has also previously filed two applications for Post-Conviction Relief which have been denied by Judges Welmaker and Hill.

April 9, 2013



 Letitia H. Verdin
 Circuit Judge

Certified Copy
 B. Williams
 Court C.P. & G.S.
 Greenville County, SC
 4-10-13

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

IN THE COURT OF GENERAL SESSIONS
THIRTEENTH JUDICIAL CIRCUIT

H192003

State of South Carolina,
Plaintiff

ORDER

vs.

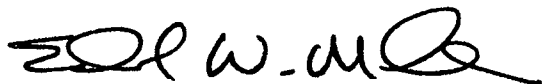
2002-GS-23-6529

Nathaniel Glenn,
Defendant

FILED
2013 APR 23 AM 9:25

The Court has considered the motions submitted by Mr. Glenn wherein Mr. Glenn requests relief pursuant to Rule 29(b) of the South Carolina Rules of Criminal Procedure and Rule 60(b)(1)-(3), (5) of the South Carolina Rules of Civil Procedure. The Court finds that it is not appropriate to grant Mr. Glenn the sought-after relief. His request is hereby DENIED.

AND IT IS SO ORDERED.


The Honorable Edward W. Miller
Circuit Court Judge

Greenville, South Carolina
April 23, 2013

STATE OF SOUTH CAROLINA

COUNTY OF GREENVILLE

The State of South Carolina,

v.

Nathaniel Glenn,

Defendant

IN THE COURT OF GENERAL SESSIONS
THIRTEENTH JUDICIAL CIRCUIT

2002-GS-23-6529

H192003

**ORDER DENYING DEFENDANT'S
MOTION FOR A NEW TRIAL**

FILED CLERK OF COURT
PAUL F. WILKINSON
GREENVILLE, CO. SC

2013 JUL 25 PM 12:17

THIS MATTER is before the Court on Defendant's motion to alter or amend this Court's previous Order Denying Defendant's Motion for a New Trial. This Court again denies Defendant's Motion due to Defendant's failure to file his appeal within 10 days as required by Rule 29, S.C.R. Crim.P. as well as his failure to provide this Court with new evidence not considered at trial.

July 10, 2013



Letitia H. Verdin
Circuit Judge

STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)
STATE OF SOUTH CAROLINA,)
V.)
NATHANIEL J. GLENN,)
DEFENDANT,)

IN THE COURT OF GENERAL SESSIONS
DOCKET NO.: 2002-GS-23-6529

MOTION FOR NEW TRIAL
BASED ON AFTER-DISCOVERED
EVIDENCE, PURSUANT TO RULE
29 (b), SCR CrimP & SCRCP 60 (b)
(1), (3), & (5).

COMES NOW THE DEFENDANT, AND MOVES BEFORE THIS COURT FOR A NEW TRIAL BASED UPON AFTER-DISCOVERED EVIDENCE PURSUANT TO RULE 29 (b), SCR CrimP, AND SCRCP 60 (b), (1), (3), & (5). THE DEFENDANT SUBMITS THAT THE CLERK'S FILES AND ADMISSIONS BY THE SOLICITOR'S OFFICE, THE GREENVILLE COUNTY SHERIFF DEPARTMENT, AND THE STATE'S CONFIDENTIAL INFORMANT ON JULY 13TH, 2004 IN FRONT OF THE HONORABLE EDWARD W. MILLER, JUDGE, AMOUNTS TO AFTER-DISCOVERED EVIDENCE UNDER RULE 29 (b), SCR CrimP, AND SCRCP 60 (b), (1), (3), & (5) TO INCLUDE A DUE PROCESS VIOLATION UNDER BOTH THE STATE AND FEDERAL CONSTITUTION, AND STATE V. SPANN, 334 S.C. 618, 513 S.E. 2D 98 (1999).

PROCEDURAL HISTORY

THE DEFENDANT GLENN IS PRESENTLY CONFINED IN THE SOUTH CAROLINA DEPARTMENT OF CORRECTIONS PURSUANT TO ORDERS OF COMMITMENT OF THE CLERK OF COURT OF GREENVILLE COUNTY. GLENN WAS INDICTED FOR TRAFFICKING COCAINE, INDICTMENT NUMBER 02-6529. IT ALLEGES THAT NATHANIEL J. GLENN DID IN GREENVILLE COUNTY ON OR ABOUT AUGUST 2ND OF 2002, KNOWINGLY SELL, MANUFACTURE, DELIVER OR BRING INTO THE STATE OF SOUTH CAROLINA OR DID KNOWINGLY PROVIDE FINANCIAL ASSISTANCE OR OTHERWISE AIDE, ABET OR CONSPIRE TO SELL, MANUFACTURE, DELIVER OR BRING INTO THE STATE, OR WAS KNOWINGLY IN ACTUAL OR CONSTRUCTIVE POSSESSION OF MORE THAN 10 GRAMS OF COCAINE. HE WAS REPRESENTED BY SKIP GOLDSMITH, ESQUIRE. ON JULY 13TH, 2004 GLENN PROCEEDED TO A JURY TRIAL. GLENN WAS FOUND GUILTY OF TRAFFICKING IN COCAINE. GLENN WAS SENTENCED TO CONFINEMENT FOR (27) YEARS.

A NOTICE OF APPEAL WAS FILED ON THE DEFENDANT'S BEHALF AT THE SOUTH CAROLINA COURT OF APPEALS. THE APPLICANT SUBSEQUENTLY CHOSE TO WITHDRAW HIS APPEAL. THE COURT ISSUED THE ORDER OF DISMISSAL AND REMITTITUR ON JUNE 23, 2005.

GLENN FILED AN APPLICATION FOR POST CONVICTION RELIEF (PCR) ON FEBRUARY 20, 2006 (DOCKET NO. 2006-CP-23-1230). THE STATES MADE ITS RETURN ON OR ABOUT MAY 2, 2006. THE APPLICANT FILED A SEBSEQUENT AMENDMENT TO HIS APPLICATION- DATED JUNE 26, 2006- IN WHICH HE ALLEGED SEVERAL INSTANCES OF INEFFECTIVE OF TRIAL COUNSEL. SEE ATTACHED EXHIBIT "A" ORDER OF DISMISSAL.

ON OR ABOUT JANUARY 10, 2008 DEFENDANT ATTORNEY FILED A MOTION TO ALTER OR AMEND THE JUDGMENT WHICH WAS DENIED ON JANUARY 18, 2008 BY THE HONORABLE G. EDWARD WELMAKER, JUDGE FOR THE THIRTEENTH JUDICIAL CIRCUIT.

A NOTICE OF APPEAL WAS FILED ON JANUARY 24, 2008 WITH THE SOUTH CAROLINA SUPREME COURT. THE SOUTH CAROLINA SUPREME COURT ISSUED ITS ORDERS ON MAY 28, 2009. THE REMITTITUR FOLLOWED ON JUNE 15, 2009.

ON AUGUST 18, 2009 DEFENDANT FILED A WRIT OF HABEAS CORPUS RAISING FOUR GROUNDS FOR RELIEF. ON JANUARY 13, 2010, THE RESPONDENT FILED A MOTION FOR SUMMARY JUDGMENT. BY ORDER FILED JANUARY 14, 2010, PETITIONER WAS ADVISED OF SUMMARY JUDGMENT DISMISSAL PROCEDURE AND THE POSSIBLE CONSEQUENCES IF HE FAILED TO ADEQUATELY RESPOND TO THE MOTION. PETITIONER FAILED TO RESPOND TO THE MOTION AND THE COURT FILED N ORDER ON FEBRUARY 24, 2010, GIVING HIM ANOTHER OPPORTUNITY, THROUGH MARCH 22, 2010, FILE HIS RESPONSE. ON APRIL 5, 2010, THE PETITIONER MOVED FOR AN EXTENSION OF TIME, WHICH WAS GRANTED THROUGH APRIL 22, 2010. THE PETITIONER FILED HIS RESPONSE IN OPPOSITION TO THE MOTION FOR SUMMARY JUDGMENT ON APRIL 5, 2010, AND SUBMITTED ADDITIONAL ATTACHMENT IN SUPPORT OF HIS RESPONSE ON APRIL 9, MAY 14, AND JUNE 8, 2010. ON MAY 28, 2010, HE FILED AN AFFIDAVIT IS SUPPORT OF HIS RESPONSE, AND ON JUNE 28, 2010, HE FILED A "MOTION OF ACTUAL INNOCENCE".

ON JULY 22, 2010, THE HONORABLE KEVIN F. McDONALD, UNITED STATES MAGISTRATE JUDGE RECOMMENDED THAT THE RESPONDENT'S MOTION FOR SUMMARY JUDGMENT (DOC 23) BE GRANTED. THAT RECOMMENDATION WAS GRANTED AND THE APPEALED TO THE UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT, ON AUGUST 18, 2009. THE DECISION OF THAT COURT IS PENDING AS OF THIS FILING.

IN THE INSTANT MOTION, THE DEFENDANT HAVE MOVED PURSUANT TO THE ABOVE LEGAL AUTHORITIES AND CASE LAW. THAT STATE AND COUNTY LAW ENFORCEMENT HAVE ENGAGED IN ACTIONS TAKEN AS A WHOLE AMOUNTS TO A DENIAL OF EQUAL PROTECTION OF THE LAW. THAT SUCH VIOLATIONS OCCURED DURING THE COURSE OF THE DEFENDANT'S JUDICIAL PROCESS AND DENIED HIM DUE PROCESS. SEE WASHINGTON V. STATE, 478 S.E. 2D 833 (SC 1996).

THE HEREIN ALLEGATION'S, PRESENTS "UNIQUE" COMBINATION OF FACTS AND UNUSUAL CIRCUMSTANCES WHICH WARRANTS REVIEW. THUS, DEFENDANT SHOULD NOT BE PUNISHED FOR THE ACTIONS AND INACTIONS OF HIS APPOINTED ATTORNEY'S THROUGHOUT HIS JUDICIAL PROCESS. IT IS GENERALLY PREFERRED THAT A BLAMELESS PARTY NOT BE DISADVANTAGED (AS HERE) BY THE PROCEDURAL ERRORS OR NEGLECT OF HIS/HER ATTORNEY. HARRIS V. U.S. RR RETIREMENT BD., 198 F3D 139 (4TH CIR. 1999).

THE ALLEGATION'S SET FORTHBELOW PRESENTS A PRIMA FACIE VIOLATION OF DEFENDANT'S CONSTITUTIONAL RIGHTS. ROGERS V. STATE, 261 S.C. 288, 199 S.E. 2D 761 (1973). THE ALLEGATIONS IN THE MOTION MUST BE ACCEPTED AS TRUE UNLESS AND UNTIL SUCCESSFULLY REFUTED. BLANDSHAW V. STATE, 245 S.C. 385, 140 S.E. 2D 784 (1965).

ON THE MATTER SUB JUDICE, THE DEFENDANT IS ALLEGING AFTER-DISCOVERED EVIDENCE THAT WARRANTS A NEW TRIAL AND/ OR VACATION OF HIS CONVICTION. TO PREVAIL ON THIS CLAIM THE DEFENDANT "MUST SHOW THAT THE AFTER-DISCOVERED EVIDENCE: (1) IS SUCH THAT IT WOULD PROBABLY CHANGE THE RESULT IF A NEW TRIAL WERE GRANTED; (2) HAS BEEN DISCOVERED SINCE THE TRIAL; (3) COULD NOT IN THE EXERCISE OF DUE DILIGENCE BEEN DISCOVERED PRIOR TO TRIAL; (4) IS MATERIAL; AND (5) IS NOT MERELY CUMULATIVE OR IMPEACHING". STATE V. NEEDS, 333 S.C. 134, 508 S.E. 2D 857 (1998).

ARGUMENT

BY WAY OF THIS MOTION, THE DEFENDANT IS ALLEGING AFTER-DISCOVERED EVIDENCE DUE TO THE CONDUCT OF STATE OFFICIALS AND THE STATE'S CHIEF INFORMANT. THAT SUCH CONDUCT AMOUNTS TO FRAUD UPON THE COURT, DENIAL OF A FAIR TRIAL AND PERJURY. SEE WASHINGTON V. STATE, 324 S.C. 232, 487 S.E. 2D 883 (1996); GIGLIO, 405 U.S. AT 154-55, 92 S.C.T. 763. 478 833

THE DEFENDANT'S TRIAL TRANSCRIPT'S BEARS OUT THE ALLEGATION'S BEFORE THE COURT ARE SUBMITTED AS AN EXHIBIT IN SUPPORT THEREOF. EACH NUMBERED PAGE INDICATED SHOWS WHERE THE PROSECUTOR, INFORMANT, AND POLICE OFFICER'S COMMITTED PERJURY AND FRAUD UPON THE COURT. WHERE THE LAW HOLDS: WHERE THE PROSECUTOR FAILED TO CORRECT THE WITNESS PERJURED TESTIMONY, ALTHOUGH HE CLEARLY (AS HERE) KNEW IT TO BE FALSE. THE SUPREME COURT HELD THAT THE FALSE TESTIMONY USED BY THE STATE IN SECURING THE CONVICTION MAY HAVE HAD AN EFFECT ON THE OUTCOME OF THE TRIAL, AND ACCORDINGLY, REVERSED THE DEFENDANT'S CONVICTION. ID. AT 272, 79 S.C.T. 1173, NAPUE V. ILLINOIS, IN THE INSTANT CASE, THE PROSECUTOR FAILED TO CORRECT THE PERJURY AND REPEATED THE WITNESS FALSEHOOD IN HIS SUMMATION. (SEE TRANSCRIPT ATTACHED). THE SUPREME COURT REVERSED THE DEFENDANT'S CONVICTION BECAUSE THERE WAS REASONABLE LIKEHOOD THAT THE PROSECUTOR'S KNOWING USE OF PERJURY ON AN ISSUE SO RELEVANT TO THE WITNESS' CREDIBILITY AFFECTED THE JUDGMENT OF THE JURY. GIGLIO, 405 U.S. AT 154-55, 92 S.C.T. 763. THUS, THE GRANT OF A NEW TRIAL BASED UPON A NAPUE VIOLATION IS PROPER ONLY IF (AS HERE) (1) THE STATEMENT IS QUESTION ARE SHOWN TO BE ACTUALLY FALSE; (2) (AS HERE) THE PROSECUTION KNEW THAT THEY WERE FALSE; AND (3) (AS HERE) THE STATEMENTS WERE MATERIAL. UNITED STATES V. BLACKBURN, 9 F.3D 353 357 (5TH CIR. 1993). UNITED STATES V. O'KEEFE, 128 F.3D 885, 893 (5TH CIR. 1997).

THEREFORE, THE DEFENDANT URGES THIS COURT TO CONSIDER HIS CLAIM OF AFTER DISCOVERED EVIDENCE AND THE FOLLOWING TESTIMONY AND EXHIBIT'S THAT ARE BEING PRESENTED AND COULD NOT BE PRESENTED PRIOR TO TRIAL AND SENTENCING: 1)INFORMANT CHADWICK TEASLEY, ARREST REPORT DRUG ANALYSIS FINDINGS; INCIDENT'S REPORT'S OF DET. BOBBY CARIAS AND DET. MELISSA LAWSON, CONCERNING THE AMOUNTS OF FUNDS USED; INCIDENT REPORTS OF THE TIME FRAMES OF THE ALLEGED DRUG MEETING. THE DEFENDANT SUBMITS IT WOULD AMOUNT TO "A DENIAL OF FUNDAMENTAL FAIRNESS SHOCKING TO THE JUDICIAL SENSE OF JUSTICE" IF THIS COURT FAILS TO CONSIDER AND ACT ON THESE ISSUES OF AFTER-DISCOVERED EVIDENCE. SEE JOHNSON V. CATOE, 345 S.C. 389, 401, 548 S.E. 2D 587, 593 (2001) (WALLER, J., DESENTING) (QUOTING BULTER V. STATE, 302 S.C. 466, 468, 397 S.E. 2D 87, 88 (1990)).

CONCLUSION

BASED UPON THE FOREGOING DEFENDANT MOVES THIS HONORABLE COURT TO CONDUCT A HEARING TO ASCERTAIN THE HEREIN ALLEGATION'S AND FOR SUCH OTHER AND FURTHER RELIEF, THE COURT DEEMS JUST, FAIR AND PROPER.

DATED: May 5, 2011
COLUMBIA, SOUTH CAROLINA

RESPECTFULLY SUBMITTED,
S/ Nathaniel J. Gleen
NATHANIEL J. GLEEN, #303563
BRCI-CONGAREE #104
4460 BROAD RIVER ROAD
COLUMBIA, S.C. 29210

CERTIFICATE OF MAILING

I HEREBY CERTIFY THAT I MAILED MY MOTION FOR NEW TRIAL TO THE BELOW LISTED PERSON. BY PLACING SAME IN THE U.S. MAIL AND ADDRESSED AS FOLLOWS:

CLERK OF COURT
GREENVILLE COUNTY COURTHOUSE
305 MAIL STREET
GREENVILLE, S.C. 29601

s/ Nathaniel J. Glenn
NATHANIEL J. GLENN, #303563
BRCI-CONGAREE #104
4460 BROAD RIVER ROAD
COLUMBIA, S.C. 29210

SWORN TO AND BEFORE ME THIS
9th DAY OF May, 2011

Susan H. Frye (L.S.)
NOTARY PUBLIC FOR S.C. My Commission Expires
MY COMMISSION EXPIRES: March 5, 2018

NOTARY PUBLIC
SUSAN H. FRYE
2011 MAY 19 AM 10:16

State of South Carolina

Court of General

County of Greenville

Sessions

Nathaniel Glenn Jr. #303563]

Petitioner.]

Motion To Amend

To Rule 29 (b)

Vs.]

Motion Of New Found

State of South Carolina.]

Evidence

Respondent.]

2002-GS-23-6529

The above named Petitioner would respectfully move this court to Amend the following Motion of New and Exculpatory Evidence that contradicted the State's account of the incident's Chain of Custody to his Rule 29 (b). based on the following:

Due towards the New Found Evidence of the VHS video tape Chain of Custody Issue. State vs. Williams. 301 s.c. 369.392 S.E.2d 181 (1990). (a complete chain of custody must be established as far as practicable). The State has not established a practical chain of custody of the video tape which was a critical item used to convict the Petitioner.

Detective Lawson testified that she made a copy of the 8mm video tape and put it on a VHS tape for VCR. Trp.35. Detective Lawson testified that the wire that the informant was wearing was recorded separately onto a floppy disk. Trp. 35.

Detective Lawson testified that they had originally recorded the video with a 8mm camera, hand held in the back seat of the vehicle by Detective Bobby Carias. Trp. 35 and 40.

Detective Lawson testified she obtained the VHS video tape fromm the Property and Evidence room that morning before trial, Trp. 39.

The first review of the two incomplete evidence sheets that was received several years after the Petitioners trial from (PCR) Attorney Rodney Richey, did not indicate the time frames when Det. Lawson testified that she possessed the evidence up until the date of July 13, 2004. Exhibit (B-1).

May 12, 2008. Petitioner received two complete evidence sheets that indicated Det. Lawson had possession of the Sony minidisc TDK 8mm tape, and the Sony audio cassette (phone call). From the date of February 17, 2004 until February 19, 2004, but the evidence sheet does not indicate, nor reveal the deposit of a VHS video tape. Exhibit (B-2).

The evidence sheet indicates a broken chain of custody by the following:

February 17, thru February 19, 2004. Det. Lawson signed out the audio and video surveillance for court, but there was not a subpoena ordered for the Petitioner to appear for trial. Next, there was not any discovery of an affidavit allowing the detective to join together the audio and video to alter, rerecord, enhance, duplicate, and change from its original form to persuade the jurors to decide a guilty verdict, then denied the Petitioner the right to examine the original recordings before they were destroyed.

And last, there was no whereabouts of the VHS video tape deposited upon the property and evidence sheets. A review of the property and evidence sheets indicated the detective had possession of the evidence several days under her own authority from the dates of February 17, thru February 19, of 2004.

Proof of chain of custody need not negate all possibility of tampering so long as the chain of possession is complete. *State vs. Carter*. 344 S.C.419.544S.E.2d.835 (2001). Here, the chain is not complete and does not negate the possibility of tampering. In applying the Rule, the court found evidence is admissible only where there is a missing link in the chain of possession because the identity of those who handled the evidence.

State vs. Cribb. 310S.C.518.426E.E.2d306(1992). There is a missing link in the chain of possession of the audio and video surveillance, as Det. Lawson has not identified accurate possession of the VHS tape to prevent possibility of tampering, nor can possibility of tampering be negated due to the lack of authenticity of the dates displayed on the tape.

To conclude this argument, Det. Lawson submitted prejudicial tainted evidence of the audio and video surveillance that violated the States Federal Constitutional Obligation to disclose evidence favorable to the defense. *Brady vs. Maryland*. 373U.S.83(1963), which stemmed from a false testimony during the Petitioners trial, and the in-court, identification of the illegal video footage was the "fruit" of the scene of the crime. Det. Lawson joined together two separate audio surveillances and two separate video surveillances with prejudice and denied the Petitioner the right under Brady to review and have the original recordings examined by an expert before they were destroyed.

Petitioners next argument is the Prosecutor allowed and confirmed Det. Lawson's and Informant Teasley's false testimony that violated South Carolina Code Ann (16-9-10)(A)(1) "It is unlawful for a person to willfully give false, misleading, or incomplete testimony under oath in any court of record, judicial, administrative, or regulatory proceeding in this State," and S.C. Code Ann (16-9-30), " It is unlawful for a person to willfully and knowingly swear falsely in taking any oath required by law that is administered by a person directed or permitted by law to administer such oath".

The State witness Det. Lawson had continuously testified before the jurors that informant Teasley was arrested for possession of cocaine to persuade the jurors that the Petitioner was the higher-up dealer of an ongoing conspiracy of Teasley's arrest Trp. 25,26, and 44.

The Petitioner's defense was prejudiced by Det. Lawson's testimony of the following after discovered evidence:

1. Lawson's and Teasley's testimony on record was that Teasley's arrest was for distribution of cocaine, but March 6, 2002 he was arrested for methamphetamine Exhibit (A-1), Arrest warrant.
2. Lawson testified that Teasley had pending charges August 2, 2002, as the video footage was played before the jurors, but May 20, 2002, the informant charges were dismissed. Exhibit (A-2), Disposition sheet.
3. Teasley's crime laboratory report from the result of his arrest March 6, 2002, was No Controlled Substance Detected-March 25, 2002. Exhibit (A-3). Crime lab report.

Upon the conclusion of the State's testimony from Teasley to Prosecutor Joyce Monts and the Prosecutor's closing argument. Prosecutor Monts stated during trial of her and Teasley's previous meeting. Trp. 47. Prosecutor continued questioning the witness of his distribution of cocaine charge was not dismissed. Trp. 54. During closing arguments, Monts stated that Teasley could have been pursued a conviction on the distribution of cocaine charge. Trp. 74

To conclude this argument, the Prosecutor had willfully and knowingly withheld discovery from the Petitioner with deliberate indifference and the witnesses had intentionally misled the jurors.

The State witnesses misleading testimony had prejudiced the Petitioners defense. Berger vs. United States. 295 U.S. 78.88 (1935). "It is as much [a prosecutor's] duty to refrain from improper methods calculated to produce a wrongful conviction as it is to use every legitimate means to bring about a just one".

The Petitioner's constitutional rights were violated when the prosecutor, detective, and informant established the conscious disregard for the consequences of their actions once the "deliberate indifference" was committed during their false testimony and presentment of tainted evidence before the Petitioners jury trial.

Therefore, the Petitioner Prays before Your Honorable Court that his sentence and conviction to be Vacated for New Trial.

Nathaniel Glenn Jr. Pro Se

Nathaniel Glenn Jr. #303563

Broad River C.I.

4460 Broad River Rd.

Columbia, S.C. 29210

Sworn To And Subscribed before

Me this 11 day of

June, 2011.

Notary Public of South Carolina

My Commission Expires: _____

I submitted this motion to the Greenville County Clerk's office before I hired Atty. Tommy Thomas and my motion was ignored by the Court.

I declare under penalty of perjury that the above statement is true and correct.

STATE OF SOUTH CAROLINA)	IN THE COURT OF GENERAL SESSIONS
)	
COUNTY OF GREENVILLE)	DOCKET NO.: 2002-GS-23-6529
)	
STATE OF SOUTH CAROLINA,)	AMENDED
)	MOTION FOR NEW TRIAL BASED ON
Plaintiff,)	AFTER-DISCOVERED EVIDENCE
v.)	PURSUANT TO RULE 29 (b), SCRCrimp & SCRPC 60
)	SCRPC 60 (b) (1), (3) & (5).
Nathanial Glenn,)	
)	
Defendant.)	
)	

Comes Now the Defendant, and moves before this Court for a new trial based upon after-discovered evidence pursuant to Rule 29 (b), SCRCrimp, and SCRPC 60 (b), (1), (3), & (5).

PROCEDURAL HISTORY

The Defendant is currently incarcerated in the South Carolina Department of Corrections pursuant to Orders of commitment of the Clerk of Court of Greenville County. The Defendant was indicted for trafficking cocaine, (02-GS-23-6529). The Indictment alleges that the Defendant did, in Greenville County, on or about August 2, 2002, knowingly sell, manufacture, deliver or bring into the State of South Carolina or did knowingly provide financial assistance or otherwise aide, abet or conspire to sell, Manufacture, deliver or bring into the State, or was knowingly in actual or constructive possession of more than 10 grams of cocaine. The Defendant was represented by Skip Goldsmith, Esq. On July 13, 2004, the Defendant proceeded with a jury trial and was found guilty of Trafficking in Cocaine and sentenced to twenty seven (27) years.

A Notice of Appeal was filed on the Defendant's behalf with the South Carolina Court of Appeals. Mr. Glenn subsequently chose to withdraw this Appeal. The Court issued an Order of Dismissal and Remittitur on June 23, 2005.

The Defendant filed an Application for Post Conviction Relief on February 20, 2006 (Docket No. 2006-CP-23-1230). The State made its Return on or about May 2, 2006. The Applicant filed a subsequent Amendment to his Application dated June 26, 2006. This matter was dismissed by the Court.

On or about January 10, 2008, Defendant's attorney filed a Motion to Alter or Amend the Judgment which was denied on January 18, 2008 by the Honorable G. Edward Welmaker, Judge of the Thirteenth Judicial Circuit.

A Notice of Appeal was filed on January 24, 2008 with the South Carolina Supreme Court. The South Carolina Supreme Court issued its Order on May 28, 2009. The Remittitur followed on June 15, 2009.

On August 18, 2009, Defendant filed a Writ of Habeas Corpus raising four grounds for relief. On January 13, 2010, the respondent filed a Motion for Summary Judgment. By Order filed January 14, 2010, Petitioner was advised of Summary Judgment Dismissal procedure and the possible consequences if he failed to adequately respond to the Motion. Petitioner failed to respond to the Motion and the Court filed an order on February 24, 2010, giving him another opportunity, through March 22, 2010 to file his response. On April 5, 2010, the Petitioner moved for an extension of time, which was granted through April 22, 2010. The Petitioner filed his response in opposition to the Motion for Summary Judgment on April 5, 2010 and submitted additional attachments in support of his Response on April 9, 2010, May 14, 2010 and June 8, 2010. On May 28, 2010, he filed an Affidavit in support of his response and on June 28, 2010.

On July 22, 2010, the Honorable Kevin F. McDonald, United States Magistrate Judge recommended that the Respondent's Motion for Summary Judgment (DOC 23) be granted. The recommendation was granted and the appeal to the United States Court of Appeals for the Fourth

Circuit, on August 18, 2009. On April 26, 2011, Defendant's appeal was dismissed by unpublished per curiam opinion and a Certificate of Appealability was denied.

Argument

The Defendant was indicted for trafficking cocaine 10g-28g (2002-GS-23-6388) as a result of an alleged drug purchase on July 16, 2002. The Defendant was indicted for trafficking cocaine 10g-28g (2002-GS-23-6529) as a result of an alleged drug purchase on August 2, 2002. Both alleged drug purchases on July 16th and August 2nd were captured on an 8mm video camera by Detectives Bobby Carias and Melissa Lawson. It appears the July 16th purchase was captured by a sony minidisc and a TDK 8mm tape (case no. 2-02-60712); and the August 2nd purchase was captured by a sony minidisc, a TDK 8mm tape, and a sony audio cassette (case no. 2-02-65041).

Upon information and belief, Assistant Solicitor Joyce Monts provided the Defendant's attorney with a videotape of the Defendant's two (2) pending drug charges on or about March 4, 2004. It appears that Detective Melissa Lawson from the Greenville City Police Department transferred and combined the two (2) individual 8mm video recordings onto a single VHS videotape for play on a VCR. The Defendant proceeded to trial on July 13, 2004 solely on the charge arising from the alleged drug purchase on August 2, 2002; however, the consolidated VHS videotape was introduced without objection and played for the Jury at trial. The charge arising from the July 16th drug purchase was nolle prossed on July 26, 2004.

Due to the Defendant's location in the Courtroom during the trial, the Defendant could not see the publication of the consolidated VHS videotape and therefore completely unaware that both drug purchases (July 16th and August 2nd) were shown to the Jury.

It was only at a later date through the Freedom of Information Act that the Defendant discovered the consolidated VHS videotape had been transposed and that the two (2) original individual TDK 8mm videotapes no longer existed. The Defendant is informed and believes that the altering and combining of the two (2) TDK 8mm videotapes was an unlawful alteration and as such would have rendered the consolidated VHS videotape as inadmissible. Moreover, the Defendant was clearly prejudiced when the Jury was shown video of the July 16th alleged drug purchase as the Defendant was not on trial for said charge.

“To prove the content of a writing, recording, or photograph, the original writing, recording, or photograph is required, except as otherwise provided in these rules or by statute.” Rule 1002, SCRE. “The original is not required, and other evidence of the contents of a writing, recording, or photograph is admissible if- [] All originals are lost or have been destroyed, unless the proponent lost or destroyed them in bad faith.” Rule 1004, SCRE.

An “original” of a writing or recording is the writing or recording itself or any counterpart intended to have the same effect by a person executing or issuing it. An “original” of a photograph includes the negative or any print therefrom. If data are stored in a computer or similar device, any printout or other output readable by sight, shown to reflect the data accurately, is an “original.” Rule 1001(3), SCRE. Further, Rule 1001 defines a duplicate as “a counterpart produced by the same impression as the original, or from the same matrix, or by means of photography, including enlargements and miniatures, or by mechanical or electronic re-recording, or by chemical reproduction, or by other equivalent techniques which accurately produces the original.” Rule 1001(4), SCRE. Rule 1003, SCRE states that “[a] duplicate is admissible to the same extent as an original unless (1) a genuine question is raised as to the authenticity of the original or (2) in the circumstances it would be unfair to admit the duplicate in

lieu of the original.” The Defendant submits that at the time of his trial, the original TDK 8mm videotapes of the July 16th and August 2nd alleged drug purchases were available. The consolidated VHS videotape does not constitute an “original” as defined by the Rules, nor does it qualify as a “duplicate.”

The Defendant believes that the chain of custody for the consolidated VHS videotape was not and cannot be established. “Proof of chain of custody need not negate all possibility of tampering so long as the chain of possession is complete.” State v. Carter, 344 S.C. 419, 544 S.E.2d 835 (2001). “In applying this rule, we have found evidence inadmissible only where there is a missing link in the chain of possession because the identity of those who handled the [substance] was not established at least as far as practicable. See id.

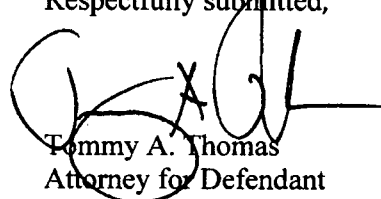
“Evidence is still required as to how the item was obtained and how it was handled to ensure that it is, in fact, what it is purported to be.” State v. Hatcher, 392 S.C. 86, 708 S.E.2d 750 (2011). In Hatcher, the South Carolina Supreme Court considered the following factors in reviewing the chain of custody: the nature of the article, the circumstances surrounding the preservation and custody of it, and the likelihood of intermeddlers tampering with it.

The Defendant submits that consolidating the two (2) individual videos of the July 16th and August 2nd alleged drug purchases into a single video and shown to the Jury at trial where the Defendant is being tried for one of the alleged drug purchase is highly prejudicial and improper. The Defendant believes that the consolidation of the videos is tantamount to tampering with the original 8mm TDK videotapes. There does not appear to be any testimony and/or evidence as to when, where, and how the consolidated VHS videotape was made.

Conclusion

Wherefore, the above-described after-discovered evidence above has never been presented nor heard by the Court. The Defendant respectfully requests a hearing be held on this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tommy A. Thomas', is written over the typed name.

Tommy A. Thomas
Attorney for Defendant
P.O. Box 88
Irmo, SC 29063
(803) 732-5507

December 12, 2012

STATE OF SOUTH CAROLINA)
)
COUNTY OF GREENVILLE)
)
The State of South Carolina)
)
vs.)
)
NATHANIAL GLENN,)
)
Defendant)

IN THE COURT OF GENERAL SESSIONS
THIRTEENTH JUDICIAL CIRCUIT

2002-GS-23-6529

H 192003

**MOTION TO DISMISS DEFENDANT'S
AMENDED MOTION FOR NEW TRIAL BASED
ON AFTER-DISCOVERED EVIDENCE PURSUANT
TO RULE 29 (b), SCRCrimp &
SCRCP 60 (b) (1), (3) & (5)**

FILED
MAR 19 AM 9:30
CLERK OF COURT

On July 13, 2004, a jury found the defendant guilty of trafficking cocaine more than 10 grams. The defendant was sentenced to 27 years. The defendant appealed and on June 23, 2005, the court of appeals dismissed the appeal. Subsequently, the defendant filed an action for post-conviction relief (PCR), which was denied by Judge Welmaker on December 13, 2007. On November 18, 2009, the defendant filed a second application for PCR, which was denied by Judge Hill on July 6, 2010.¹

The defendant has filed a motion for a new trial pursuant to Rule 60 of the South Carolina Rules of Civil Procedure. The State moves to dismiss this motion pursuant to the rules of Civil Procedure as a court of general sessions does not have jurisdiction over these arguments and the rules of civil procedure are not applicable to general session matters.

The State also moves to dismiss this motion for a new trial pursuant to Rule 29 of the Rules of Criminal Procedure. In order for a court to grant a new trial based on after discovered evidence, a defendant must show: (1) is such that it would probably change the result if a new trial were granted; (2) has been discovered since the trial; (3) could not in the exercise of due diligence have been discovered prior to the trial; (4) is material; and (5) is not merely cumulative or impeaching. State v. Mercer, 381 S.C. 149, 166, 672 S.E.2d 556, 565 (2009) (citation

¹ On August 18, 2009, the defendant filed a writ of habeas corpus in the federal court. On September 23, 2010, the district court adopted the magistrate judge's report and recommendation and denied the defendant relief. On April 26, 2011, the Fourth Circuit dismissed the defendant's appeal based on the defendant's failure to timely file objections.

omitted). In this case, the defendant seeks a new trial based on evidence which was admitted at trial and therefore cannot meet any of the requirements as set forth in Mercer.

Furthermore, the defendant raised this issue in his second application for PCR.² In the order dismissing the application, Judge Hill noted that the defendant "alleges he is being held in custody unlawfully for the following reasons:

1. Newly discovered evidence:
 - a. "video tape that was used during trial was taunted (sic) evidence"

Judge Hill ruled that the evidence did not meet any of the requirements for after-discovered evidence. He additionally ruled the defendant's PCR action was barred as being successive. A successive PCR application is one that raises grounds not raised in a prior application, raises grounds previously heard and determined, or raises grounds waived in prior proceedings. *Odom v. State*, 337 S.C. 256, 523 S.E.2d 753 (1999). Successive PCR applications and appeals are generally disfavored because they allow an applicant to receive more than "one bite at the apple". Id. In filing this motion, the defendant is now essentially asking for a third bite at the apple.

For the foregoing reasons, the State requests defendant's motion be dismissed.

Respectfully Submitted By:

Joyce Monts
Joyce Monts, Assistant Solicitor
Thirteenth Judicial Circuit
Bar No. 65331
305 East North Street, Suite 325
Greenville, SC 29601

3/19, 2013

Greenville, South Carolina

² A copy of Judge Hill's final order and conditional order are attached.

#192003

STATE OF SOUTH CAROLINA)
)
COUNTY OF GREENVILLE)

IN THE COURT OF GENERAL SESSIONS

DOCKET NO.: 2002-GS-23-6529

STATE OF SOUTH CAROLINA,)

Plaintiff,
v.

NOTICE OF MOTION AND
MOTION TO ALTER OR
AMEND THE JUDGMENT

Nathanial Glenn,

Defendant.

2013 APR 24 A 8:50

FILED
GENERAL SESSIONS
PAUL B. WICKHAM, CLERK

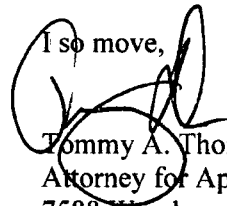
PLEASE TAKE NOTICE that the Defendant, through his undersigned attorneys hereby moves before the Honorable Letitia H. Verdin to alter or amend the judgment entered in this action on April 9, 2013. A copy of the Order of Dismissal was received by the undersigned attorneys on April 10, 2013 by fax.

COMES NOW the Applicant, by and through his undersigned attorneys, and submits the following grounds in support of his Motion to Alter or Amend the Judgment:

1. That an original and Amended Motion for New Trial based on After-discovered evidence was filed with the Court. The Amended Motion being filed on January 14, 2013. A copy of which is attached hereto.
2. That the State filed a Motion to Dismiss the Defendant's Amended Motion on March 19, 2013.
3. This action was summarily Dismissed on April 9, 2013.
4. That the Defendant would respectfully request that a hearing be set in order that the Defendant may present testimony in Support of his Amended Motion.

THEREFORE, based upon the foregoing the Applicant prays that the Court reconsider its Order Summarily dismissing the Defendant's Motion and that a hearing be held in order that testimony may be given.

I so move,



Tommy A. Thomas
Attorney for Applicant
7588 Woodrow Street
Irmo, SC 29063
(803) 732-5507
April 22, 2013

STATE OF SOUTH CAROLINA)
)
COUNTY OF GREENVILLE)
)
The State of South Carolina)
)
vs.)
)
NATHANIAL GLENN,)
)
Defendant)

IN THE COURT OF GENERAL SESSIONS
THIRTEENTH JUDICIAL CIRCUIT

2002-GS-23-6529

**STATE'S RESPONSE TO
DEFENDANT'S MOTION TO ALTER
OR AMEND THE JUDGMENT**

2013 JUN 27 11:56

The State objects to the defendant's motion to alter or amend the judgment. The defendant is requesting a hearing be held on the matter. The State believes the motion was properly summarily dismissed. Further, the State would argue that a hearing is unnecessary as testimony would not change the analysis of the issues raised in his petition.

Respectfully Submitted By:

Joyce Monts
Joyce Monts, Assistant Solicitor
Thirteenth Judicial Circuit
Bar No. 65331
305 East North Street, Suite 325
Greenville, SC 29601

6-27, 2013

Greenville, South Carolina

H 19 2003

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of General Sessions

Edward W. Miller, Circuit Court Judge
Letitia H. Verdin, Circuit Court Judge

Case No.: 2002-GS-23-6529

State of South Carolina,Respondent

vs.

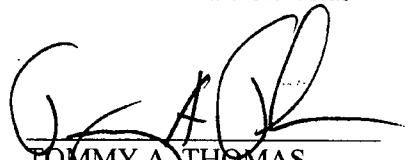
Nathaniel GlennAppellant..

FILED IN GREENVILLE COUNTY
COURT OF GENERAL SESSIONS
2013 AUG 16 PM 3:10

NOTICE OF APPEAL

Nathaniel Glenn appeals the orders of the Honorable Edward W. Miller, dated April 23, 2013 and the Order Denying Defendant's Motion for a New Trial by the Honorable Letitia H. Verdin dated July 10, 2013. The Attorney for the Appellant received copies of these two Orders on August 7, 2013.

The Appellant respectfully requests that this matter be consolidated with Appellate Case No.: 2013-000919 (Order Denying Defendant's Motion for a New Trial by the Honorable Letitia H. Verdin dated April 9, 2013).



TOMMY A. THOMAS
Attorney for Appellant
P.O. Box 88
Irmo, SC 29063
(803) 732-5507

Other Counsel of Record:

Salley W. Elliott, Esq.
Assistant Attorney General
P.O. Box 11549
Columbia, SC 29211

AP:W
EVD:W

STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)

COURT OF GENERAL SESSIONS
2002-GS-23-6529

ORIGINAL

STATE OF SOUTH CAROLINA,)
PLAINTIFF,)
vs.)
NATHANIEL J. GLENN,)
DEFENDANT.)

TRANSCRIPT OF RECORD

July 13, 2004
Greenville, South Carolina

B E F O R E:

THE HONORABLE EDWARD W. MILLER, JUDGE.

A P P E A R A N C E S:

JOYCE K. MONTS, ESQ.
Attorney for the Plaintiff

SKIP GOLDSMITH, ESQ.
Attorney for the Defendant

APRIL HERRON
Official Court Reporter

A Yes, I was.

Q Who were you working with on that day?

A I was working with Detective Carias.

Q What was your assignment that day?

A We were going to make a buy, a controlled buy of -- control purchase of cocaine from Mr. Nathaniel Glenn.

Q Explain to the jury how that works. Is that something you commonly did?

A Yes, ma'am, it is. Just to give a little background, in the unit that I work in, the Vice and Narcotics Unit, we have a street crimes unit which is called the crime reduction unit and we long term investigators. Crime reduction unit is the guys who go out to arrest the guy on the street corner selling drugs or if a citizen calls 911 and complains about drugs in their neighborhood, the crime reduction unit takes care of those problems. They do the street level -- deal with the street level dealers. In long term investigations which is what I was assigned to, we go out, we develop informants. And informants are normally developed by arresting people who decide to cooperate with the police. We confirm who they're supplying, which is the next level of the forces between your mid-level suppliers. We determine who they're buying off of, who they buy their drugs off of, then we go out and we attempt to make purchases of those drugs from these individuals to be able to work our way up the

line.

Q And did you have any contact with Chadwick Teasley?

A Yes, ma'am, we did.

Q How did you come across Mr. Teasley?

X A Mr. Teasley was arrested for a narcotics charge earlier that year of 2002.

Q Did you ask him if he wanted to cooperate with you?

X A Yes, ma'am. It's an everyday practice that we ask everybody that we come in contact with if they're willing to cooperate with the police. And the reason we do this is, simply to get the higher person above them. In this particular case Mr. Teasley decided to make the decision to cooperate with the police.

Q Did you ever serve any warrants on Mr. Teasley?

A No, we did not.

Q And where did you go on August 2nd, of 2002?

A We went to the Crown Plaza located 850 Congaree Road.

Q Is that in Greenville County?

A It is.

Q Who was with you?

A It was myself and Detective Carias.

Q And please describe what were you doing about 3:30 that afternoon.

A Earlier in the day we had set up a time with Mr. Teasley where we would meet him there at the Crown Plaza which is

did request a drug analysis to be done of the substance.

Q Going back to the video, describe what machinery you used to record the video of the incident?

A The video itself is just simply a video camera like I'm sure one of you guys have, it's just is 8 mm camera. That we -- we're not that high-tech, we simply put it on our shoulder and we zoom in. And we video it. But we also have an audio intelligence device which is what we can listen to the buy with. And it's just a small transmitter box and we record it like on a floppy disk. And it connects -- it transmits to the wire that the informants are wearing.

Q And is that same sound recorded on the video?

A Yes, ma'am.

Q And did you make a VCR video tape for court?

A Yes, I did. I originally had used a 8 mm video tape because that's we use in the video camera. And because of the court having no way to replay it, I simply made a copy and put it on VHS tape for VCR.

Q And did you bring that?

A I did.

(WHEREUPON, State's Exhibit 3 was marked for identification.)

BY MS. MONTS:

Q Detective, I'm handing what's been marked at State's Exhibit 3, can you please identify this?

A Supposed to be one half ounce of cocaine.

Q After Mr. Teasley came back from meeting with Nat Glenn, did he have the \$450 on him?

A No, he did not.

Q What did he have on him?

A He had a small bag of cocaine.

Q And we went through how you took that, State's Exhibit 2, to the property and evidence room?

A Yes.

Q How did it get here to court today?

A I went to the property and evidence room this morning and picked up all the evidence, the cocaine and the tapes, and brought it to court.

Q Did you have to check it out?

A Yes, I did.

Q What procedure do you have to go through?

A You have to sign -- you have to print your name, sign your name and put the reason you're checking the evidence out, the date and the time on bottom of the property and evidence sheet. A then the property and evidence custodian witnesses it by putting their initials on the line that you signed.

MS. MONTS: Thank you, officer, I have no further questions.

///

CROSS-EXAMINATION

BY MR. GOLDSMITH:

Q Detective Lawson, now, you were sitting in an unmarked car with your associate, Officer Carias, is that correct?

A Yes.

Q Officer Carias was actually doing the video taping at the time?

A Yes, that is correct.

Q The video tape that we saw was taken by Officer Carias not you?

A He was actually holding the camera and Officer Carias and I were in the same vehicle.

Q That's right. Now was he in the passenger side or driver side of the vehicle?

A He was in the back seat of the vehicle.

Q He was in the back seat of the vehicle. And you were in the back seat or front seat?

A I was in the front passenger.

Q Front passenger side. Okay. So the point of view that the jury just saw was your point of view on this transaction, is that correct?

A Yes, it was.

Q And for most of the video there is a car, that is a red car with a white stripe and a gray stripe at the bottom?

A Yes, sir.

A Yes, he did.

Q He's not just a good citizen wanting to come forward and help out the police and get rid of drugs around the Crown Point Hotel, right?

A I'm not saying he's not a good citizen, he does have a criminal history.

Q Has the criminal history. Has been convicted of criminal enterprises in the past?

A Yes.

/ Q And he has pending charges now or had pending charges back in August of 2002?

/ A Yes, he did back then.

/ Q At the time that he's out here on this video tape he had pending criminal charges?

/ A Yes, he did.

Q And what were those charges for?

X A Distribution of cocaine.

Q Distribution of cocaine. And what is the status of those charges today?

X A It was a charge and that charge was dismissed due to the work that Mr. Teasley did.

Q So because of the work that he did these charges were dismissed?

X A The charge was dismissed.

Q The charge was dismissed. And he understood that that's

DIRECT EXAMINATION

BY MS. MONTS:

Q Mr. Teasley, do you live in Greenville County?

A Yes.

Q I'm Joyce Monts, have you met with me prior to today?

A Yes, I have.

Q On one occasion?

A Uh-huh.

Q Did we discuss what was going to happen today in court?

A Yes.

X Q And were you arrested back in 2002 by the City Police Department on a distribution of cocaine charge?

X A Yes, I was.

Q And did you have already at that time, did you have one conviction for possession of cocaine in 2001?

A Yes.

Q So you had one conviction for drugs?

A Uh-huh.

X Q And in 2002 did Melissa Lawson, did she approach you after your arrest for distribution of cocaine and asked if you wanted to work?

X A Yes, she did.

Q And what did you say to that?

A I agreed.

Q And why did you agree to work for the police department?

X Q And I understand that the distribution charge on you from prior to this incident was never pursued or dismissed?

X A Correct.

X Q Has anything been said to you about any charges being put against you if you did not testify today?

X A No.

Q And is Nat Glenn in the courtroom today?

A Yes, he is.

Q Where is he?

A He's over there.

Q And I understand this is difficult for you today?

A Yes.

Q And why are you testifying today?

A I'm testifying today so that I can try to get a little freedom back that I've lost. And I just want to do what's right by my son. He's my first and I just don't want him to grow up without me. That's all.

Q Do you have lawful employment at this time?

A Yes, I do.

Q How long have you had lawful employment?

A Four years now.

MS. MONTS: Thank you, please answer my questions of Mr. Goldsmith.

///

///

seat. And the video camera is obstructed, I think, by the window sealer, you know, you can see it on the video. So you only see the actual driver-side window of Nat Glenn's car for a split second. But Detective Lawson is in the front seat of their vehicle, she is looking clear vision through her window. She doesn't have the handicaps that the video camera had. She testified that she saw him in that vehicle.

Now, you can believe all of what she said, part of what she said or none of what she said. Going on to Mr. Teasley, what did he tell you? And I think the Judge will tell you that you can consider his demeanor on the stand. He looked very -- to me and please use your own interpretation, this is me up here, I'm obviously for the prosecution, this is my interpretation. But I believe he was up here because he wanted to do what he needed to do. He made this case, he is on -- Mr. Teasley is on the video going to Nat Glenn's car, purchasing the cocaine for the police. He can't deny that he did that, it's on the tape. There's an audio tape setting up the deal. It's a half an ounce, \$450 worth of powder cocaine. He had a prior possession of cocaine and he had another charge but the officers never served the warrants on. I think that's where the confusion came up about whether the charge was dismissed, the warrants were just never served on him. But he knows he could possibly been pursued, a conviction on that charge. So he decided to work.

ARREST WARRANT

H-192003 10-18-02

STATE OF SOUTH CAROLINA

[X] County/ [] Municipality of GREENVILLE

THE STATE

against

02-65041

NATHANIEL J. GLENN

Address: 108 POST DR. GREENVILLE, S.C.

Phone: _____ SSN: 247-33-1299

Sex: M Race: B Height: 6'0 Weight: 257

DL State: _____ DL#: _____

DOB: 7/18/69 Agency ORI#: _____

Prosecuting Agency: GREENVILLE CITY POLICE

Prosecuting Officer: DET. BOBBY CARIAS

Offense: TRAFFICKING COCAINE

Offense Code: _____

Code/Ordinance Sec. 44-53-370

This warrant is CERTIFIED FOR SERVICE in the [X] County/ [] Municipality of GREENVILLE

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

Signature of Judge

(L.S.)

Date: _____

RETURN

A copy of this arrest warrant was delivered to defendant NATHANIEL J. GLENN on 10-3-02

K.S. Summers x951 414 Signature of Constable/Law Enforcement Officer

RETURN WARRANT TO:

Butler

STATE OF SOUTH CAROLINA

[X] County/ [] Municipality of GREENVILLE

AFFIDAVIT

Personally appeared before me the affiant DET. BOBBY CARIAS who being duly sworn deposes and says that defendant NATHANIEL J. GLENN did within this county and state on 8/02/02

violate the criminal laws of the State of South Carolina (or ordinance of [X] County/ [] Municipality of GREENVILLE) in the following particulars:

DESCRIPTION OF OFFENSE: TRAFFICKING COCAINE 44-53-370

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: ON 8/02/02 THE ACCUSED, NATHANIEL J. GLENN DID SELL A LARGE QUANTITY OF WHITE POWDER, WHICH FIELD TESTED POSITIVE FOR COCAINE, TO A CONFIDENTIAL SOURCE OF THE GREENVILLE NARCOTICS BUREAU. THIS OCCURED AT 850 CONGAREE RD. AT THE CROWNE PLAZA MOTEL. TRANSACTION WAS FOR \$450.00. AUDIO AND VIDEO SURVEILLANCE WAS USED. THIS OCCURED IN GREENVILLE COUNTY.

Sworn to and subscribed before me on 8-17-02

Signature of Issuing Judge

Signature of Affiant

Affiant's Address 426 NORTH MAIN ST.

GREENVILLE, S.C.

Affiant's Telephone 467-4390

STATE OF SOUTH CAROLINA

[X] County/ [] Municipality of GREENVILLE

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 that on 8/02/02 defendant NATHANIEL J. GLENN did violate the criminal laws of the State of South Carolina (or ordinance of [X] County/ [] Municipality of GREENVILLE) as set forth below:

DESCRIPTION OF OFFENSE: TRAFFICKING COCAINE 44-53-370

Now, therefore, 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.

Signature of Issuing Judge Judge's Address 4 McGee St Suite 116-A Greenville, SC 29601

Judge's Telephone 467-5312

Judge Code: 5020 Issuing Court: [X] Magistrate [] Municipal [] Circuit

ORIGINAL

EXHIBIT [H]

Form Approved by S.C. Attorney General July 26, 1990 SCCA 518

39

GREENVILLE COUNTY SHERIFF'S OFFICE

COMBINED

DOCKET NO. 2002-GS-23-006529
JMM

The State of South Carolina

County of Greenville

COURT OF GENERAL SESSIONS

DECEMBER TERM 2002

THE STATE

vs.

NATHANIEL J. GLENN

WITNESSES

B. CARIAS

GPD

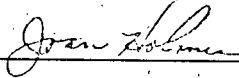
10/03/02

ARREST WARRANT NUMBER

H-192003

ACTION OF GRAND JURY

TRUE BILL



FOREMAN GRAND JURY

Foreperson of Grand Jury

VERDICT

Foreperson of Petit Jury

Date:

Indictment for

0278

TRAFFICKING COCAINE

VIOLATION § 44-53-370

40

398

STATE OF SOUTH CAROLINA)
)
COUNTY OF GREENVILLE)

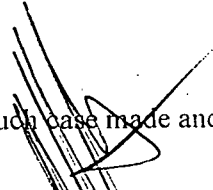
INDICTMENT FOR
TRAFFICKING COCAINE

At a Court of General Sessions, convened on DECEMBER 17, 2002 the

Grand Jurors of Greenville County present upon their oath:

That NATHANIEL J. GLENN did in Greenville County, on or about the 2nd day of August, 2002, knowingly sell, manufacture, deliver or bring into the State of South Carolina, or did knowingly provide financial assistance or otherwise aid, abet or conspire to sell, manufacture, deliver or bring into the State or was knowingly in actual or constructive possession of more than 10 grams of Cocaine. This is in violation of §44-53-370 of the South Carolina Code of Laws (1976) as amended.

Against the peace and dignity of the State, and contrary to the statute in such case made and provided.



SOLICITOR

EXHIBIT

A-1

ARREST WARRANT

H-149122 835
4.8.02

STATE OF SOUTH CAROLINA

County/ Municipality of
Greenville

THE STATE

02-640314

against

Chadwick Andre Teasley

Address: 527 Lincoln 29687
Taylor SC

Phone: _____ SSN: 250-31-0054

Sex: M Race: B Height: 6'6" Weight: 200

DL State: _____ DL#: _____

DOB: 02-09-1974 Agency ORI#: 2270000

Prosecuting Agency: GCSO

Prosecuting Officer: S. Rhea

Offense: P.W.I.D. Methamphetamine

Offense Code: _____

Code/Ordinance Sec. 44-53-335

This warrant is CERTIFIED FOR SERVICE in the

County/ Municipality of _____

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

Signature of Judge (L.S.)

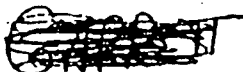
Date: _____

RETURN

A copy of this arrest warrant was delivered to defendant Chadwick Andre Teasley on 3-6-02

Wm. B. Brown 611 C-23
Signature of Constable/Law Enforcement Officer

RETURN WARRANT TO: Reid



STATE OF SOUTH CAROLINA

County/ Municipality of
Greenville

AFFIDAVIT

Form Approved by
S.C. Attorney General
July 28, 1990
SCCA 616

Personally appeared before me the affiant J. Cianciarano for S. Rhea who being duly sworn deposes and says that defendant Chadwick Andre Teasley did within this county and state on 03-06-02 violate the criminal laws of the State of South Carolina (or ordinance of County/ Municipality of Greenville) in the following particulars:

DESCRIPTION OF OFFENSE: P.W.I.D. methamphetamine

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:

THE DEFENDANT Chadwick Andre Teasley was found to be in possession of approximately 8.3 grams of a white powder substance field tested positive for methamphetamine. This incident occurred in the parking lot of Parker Bios. #741 Howell Rd. which is located in Greenville County.

COMPUTER ENTERED

Sworn to and subscribed before me on 7-6 MAR 6 2002

[Signature]
Signature of Issuing Judge

Signature of Affiant

Affiant's Address 4 McGee St. Greenville SC 29601

Affiant's Telephone 271-5210

STATE OF SOUTH CAROLINA

County/ Municipality of
Greenville

ARREST WARRANT

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

It appearing from the above affiant that there are reasonable grounds to believe that on 02-06-02 defendant Chadwick Andre Teasley did violate the criminal laws of the State of South Carolina (or ordinance of County/ Municipality of Greenville) as set forth below:

DESCRIPTION OF OFFENSE: P.W.I.D. methamphetamine

Now, therefore, 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.

[Signature] (L.S.)
Signature of Issuing Judge

Judge's Address _____
Judge's Telephone _____
Judge Code: 5747

Judge's Address _____

Judge's Telephone _____

Issuing Court: Magistrate Municipal Circuit

ORIGINAL

EXHIBIT

A-2

NOT INDICTED

General Sessions Docket

GS-23

Name: CHADWICK ANDRE TEASLEY Warrant/Ticket #: H149122

AKA:

Date of Arrest: 3/6/2002

Address: 527 LINCOLN RD

Date of Offense: 3/6/2002

Date Rec. by Clerk:

GREENVILLE, SC 00000-0000 Magistrate: 5833

SSN#: 250-31-0054

Counts: Code:

Sex: M Race: B

DOB: 6/9/1974

DL#: 007315284

Disposition Information

- 1. Transmitted to SOL & SCCA:
- 2. Disp Received by Clerk:
- 3. Date of Disposition:

MAY 20 2002

- Disposition: 1 Guilty Plea
 2 Trial Guilty
 3 Trial Not Guilty
 4 Dism/Nol Pros/Pros Ended Explain: Lack of Evidence
 5 PTI Explain: _____
 5 Judicial Commitment Explain: _____
 6 Judicial Dismissal
 7 Remanded Explain: _____
 8 Dismissed at Prelim
 8 No Bill
 9 Failure to Appear Explain: _____
 0 Other Explain: _____

Judge: _____

Court Reporter: _____

Defense Atty: _____

Solicitor: JMK

Counts: _____ Code: _____

Sentence: _____

EXHIBIT

A-3



County of Greenville

"...At Your Service"

DEPARTMENT OF PUBLIC SAFETY

GREENVILLE CRIME LABORATORY REPORT

DEPT: GREENVILLE SHERIFF'S OFFICE
OFFICER: RHEA, S.

PAGE: 1

CASE NUMBER: 1-02-040314
CONTROL NUMBER:

SUBJECT: [REDACTED]
TEASLEY, CHADWICK ANDRE

INCIDENT DATE: 3/06/02
RECEIVED FROM: PROPERTY & EVIDENCE
DATE: 3/21/02

THIS IS AN OFFICIAL REPORT OF THE GREENVILLE COUNTY DEPARTMENT OF COMMUNITY SERVICES CRIME LABORATORY AND IS TO BE USED IN CONNECTION WITH AN OFFICIAL CRIMINAL INVESTIGATION. THESE EXAMINATIONS WERE CONDUCTED UNDER YOUR ASSURANCE THAT NO PREVIOUS EXAMINATIONS OF EVIDENCE SUBMITTED IN THIS CASE HAS BEEN OR WILL BE CONDUCTED BY ANY OTHER LABORATORY OR AGENCY.

JAMES M. DORRIETY, DIRECTOR
DEPARTMENT OF COMMUNITY SERVICES

EXAMINATIONS CONDUCTED:

X CHEMICAL TEST MICROSCOPIC INFRARED SPECTROSCOPY
ULTRAVIOLET SPECTROSCOPY X GAS CHROMATOGRAPHY X MASS SPECTROSCOPY

ITEM(S) SUBMITTED

RESULTS OF EXAMINATION(S)

A) TWO BAGS CONTAINING WHITE POWDER

A) NO CONTROLLED SUBSTANCE DETECTED

[Handwritten initials]
11-25-02

I AM A CRIMINALIST EMPLOYED BY GREENVILLE COUNTY TO PERFORM CHEMICAL AND PHYSICAL EXAMINATION(S) ON EVIDENCE SUBMITTED BY LAW ENFORCEMENT AGENCIES IN CRIMINAL CASES, AND HAVE BEEN QUALIFIED IN COURTS OF RECORD IN THE STATE OF SOUTH CAROLINA TO TESTIFY ON SUCH EXAMINATION(S).

[Signature of Sean F. Collins]
SEAN F. COLLINS

3/25/02

[Handwritten initials]

46

EXHIBIT

B-1

**Greenville County Department of Community Services
Criminal Justice Support - Property Report**

- 1 - Greenville SO
- 2 - Greenville PD
- DCS - Detention
- Other _____

1. Status - Check one only:

- VGS Evidence MM Evidence Found Recovered Safekeeping Other

3. Date and Time Impounded

08-00-02/1558

It is mandatory to submit a laboratory analysis request form for all articles requiring laboratory or forensic processing.

P & E use only

AC

2. Case No.

2-02-65041

4. Case Type

Narcotics - James

5. Found or Recovered From

- Location Suspect Complainant Victim
 Person reporting AKA Other

6. Where property was impounded (Give exact location - address)

426 N. MAIN ST.

Name

7. Owner's Name

8. Owner's Address

9. Owner's Phone #

10. Item #

11. Quantity

12. Description (include make, model and serial numbers)

13. NCIC Hit
Yes No

B

1

SONY MINIDISC

C

1

TAK 8mm tape

D

1

SONY Audio Cassette (phone call)

Drug weight/grams

Officer's initials

P & E Use only
Gross weight

Evidence clerk's initials

14. I hereby acknowledge that the above lists represent all property taken from my possession and that I have received a copy of this report.

15. Impounding Officer (print full name)

16. Stan No.

17. Unit No.

Signature

18. Signature

19. Investigating Officer

20. Received by: (print name)

21. Signature

22. Reason

23. Date and Time Received

Tony Huskies

Tony Huskies

for storage

8/2/02 1140

AUTHORIZATION FOR DISPOSITION

TYPE OF DISPOSITION:

- Cleared for destruction/auction
- Release item #s _____ to: _____

AUTHORIZED BY:

Name (print) _____

Signature _____

Date _____

Name _____

Address _____

ID# _____

It is the authorizing officer's responsibility to notify owners to claim property.

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RECORDS

Greenville County Department of Community Services Criminal Justice Support - Property Report

- 1 - Greenville SO
- 2 - Greenville PD
- DCS - Detention
- Other

1. Status - Check one only:

GS Evidence
 MM Evidence
 Found
 Recovered
 Safekeeping
 Other

2. Case No. D-02-60710

3. Date and Time Impounded
07/16/02 1846

It is mandatory to submit a laboratory analysis request form for all articles requiring laboratory or forensic processing.

P & E use only

4. Case Type
Narcotics Tables

5. Found or Recovered From

Location
 Suspect
 Complainant
 Victim
 Person reporting
 AKA
 Other

6. Where property was impounded (Give exact location - address)

426 N. MAIN ST

Name

7. Owner's Name

8. Owner's Address

9. Owner's Phone #

10. Item #	11. Quantity	12. Description (include make, model and serial numbers)	13. NCIC Hit	
			Yes	No
<u>B</u>	<u>1</u>	<u>SONY minidisc</u>		
<u>C</u>	<u>1</u>	<u>TDK 8mm tape</u>		

14. I hereby acknowledge that the above lists represent all property taken from my possession and that I have received a copy of this report.

Signature _____

Officer's initials _____

P & E Use only Gross weight _____ Evidence clerk's initials _____

15. Impounding Officer (print full name) B. Canas

16. Star No. 0299 17. Unit No. 83

18. Signature _____ 19. Investigating Officer Same

20. Received by: (print name)	21. Signature	22. Reason	23. Date and Time Received
<u>B. Canas</u>	<u>[Signature]</u>	<u>Drop Box</u>	<u>07-16-02</u>
<u>[Signature]</u>	<u>[Signature]</u>	<u>ATC Storage</u>	<u>7-17-02 07:47</u>

AUTHORIZATION FOR DISPOSITION

TYPE OF DISPOSITION:

Cleared for destruction/auction
 Release item # _____ to: _____

AUTHORIZED BY: _____
 Name (print) _____
 Signature _____
 Date _____

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EXHIBIT

B-2

**Greenville County Department of Community Services
Criminal Justice Support - Property Report**

- 1 - Greenville SO
- 2 - Greenville PD
- DCS - Detention
- Other _____

1. Status - Check one only:
 GS Evidence MM Evidence Found Recovered Safekeeping Other _____

2. Case No. 2-02-65041
 3. Date and Time Impounded 18-02-02/1558 **It is mandatory to submit a laboratory analysis request form for all articles requiring laboratory or forensic processing.** P & E use only AC
 4. Case Type Narcotics Interest
 5. Found or Recovered From Location Suspect Complainant Victim
 Person reporting AKA R Other _____
 6. Where property was impounded (Give exact location - address)
426 N. MAIN ST.

7. Owner's Name _____ 8. Owner's Address _____ 9. Owner's Phone # _____

10. Item #	11. Quantity	12. Description (include make, model and serial numbers)	13. NCIC Hit	
			Yes	No
B	1	SONY minidisc		
C	1	TDK 8mm tape		
D	1	SONY audio cassette (phone call)		

Drug weight/grams _____ Officer's initials _____ P & E Use only Gross weight _____ Evidence clerk's initials _____

14. I hereby acknowledge that the above lists represent all property taken from my possession and that I have received a copy of this report.
 Signature _____ 15. Impounding Officer (print full name) MA Lawson 16. Stat No. 0167 17. Unit No. 79
 18. Signature MA Lawson 19. Investigating Officer Carson

20. Received by: (print name)	21. Signature	22. Reason	23. Date and Time Received
Long Kiniskis	<u>Long Kiniskis</u>	PE storage	3/2/02 1640
MA LAWSON	<u>MA Lawson</u>	Investigation	09/17/02 1449
R Pruitt	<u>R Pruitt</u>	PE storage	9/17/02 1600
MA Lawson	<u>MA Lawson</u>	court	07/26/02 1704 0900
R BENNICK	<u>R BENNICK</u>	PE storage	2/19/04 945
MA Lawson	<u>MA Lawson</u>	court	7/13/04 0953
Shirley Klein	<u>Shirley Klein</u>	court	7/13/04 1345
MA Lawson	<u>MA Lawson</u>	Transport P+E	7/13/04 1445
R Pruitt	<u>R Pruitt</u>	PE storage	7/13/04 1430
C.R. Brack	<u>C Brack</u>	DESTROY	8-8-07 1106

AUTHORIZATION FOR DISPOSITION
 TYPE OF DISPOSITION:
 Cleared for destruction/auction Items _____
 Release item #s _____ to: _____
 Name _____ Address _____ ID# _____
 AUTHORIZED BY: _____
 Name (print) _____
 Signature _____
 Date _____

**Greenville County Department of Community Services
Criminal Justice Support - Property Report**



- 1 - Greenville SO
- 2 - Greenville PD
- DCS - Detention
- Other _____

1. Status - Check one only:
 GS Evidence MM Evidence Found Recovered Safekeeping Other

3. Date and Time Impounded: 07-16-02 / 1846
 It is mandatory to submit a laboratory analysis request form for all articles requiring laboratory or forensic processing.
 P & E use only: AC
 2. Case No.: 2-02-60712
 4. Case Type: Abrogation TAVES

5. Found or Recovered From: Location Suspect Complainant Victim
 Person reporting AKA Other

6. Where property was impounded (Give exact location - address):
426 N. MAIN ST

7. Owner's Name: _____
 8. Owner's Address: _____
 9. Owner's Phone #: _____

10. Item #	11. Quantity	12. Description (include make, model and serial numbers)	13. NCIC Hit	
			Yes	No
<u>B</u>	<u>1</u>	<u>Sony minidisc</u>		
<u>C</u>	<u>1</u>	<u>TDK 8mm tape</u>		

5/6/02

14. I hereby acknowledge that the above lists represent all property taken from my possession and that I have received a copy of this report.
 Signature: _____ Officer's initials: _____
 P & E Use only Gross weight: _____ Evidence clerk's initials: _____

15. Impounding Officer (print full name): B. Caras
 16. Stat No.: 0249 / 17. Unit No.: 83
 18. Signature: [Signature]
 19. Investigating Officer: same

20. Received by: (print name)	21. Signature	22. Reason	23. Date and Time Received
<u>B. Caras</u>	<u>[Signature]</u>	<u>Drop Box</u>	<u>07-16-02 /</u>
<u>Jessica Jordan</u>	<u>Jessica Jordan</u>	<u>PE Storage</u>	<u>7-17-02 0747</u>
<u>M. Lawson</u>	<u>[Signature]</u>	<u>Investigation</u>	<u>09-17-02 / 1449</u>
<u>R. Pruitt</u>	<u>R. Pruitt</u>	<u>PE Storage</u>	<u>9-17-02 1600</u>
<u>M. Lawson</u>	<u>M. Lawson</u>	<u>Court</u>	<u>2-12-04 0900</u>
<u>K. Bennick</u>	<u>K. Bennick</u>	<u>Storage PE</u>	<u>2-19-04 0845</u>
<u>M. Lawson</u>	<u>[Signature]</u>	<u>Court</u>	<u>7-13-04 0753</u>
<u>R. Pruitt</u>	<u>R. Pruitt</u>	<u>PE Storage</u>	<u>7-13-04 1428</u>
<u>G. Blake</u>	<u>[Signature]</u>	<u>Drop Box</u>	<u>11-7-06 0950</u>

AUTHORIZATION FOR DISPOSITION

TYPE OF DISPOSITION:
 Cleared for destruction/auction Items _____
 Release item #s _____ to: _____

AUTHORIZED BY:
 Name (print): _____
 Signature: _____
 Date: _____

Name: _____
 Address: _____
 ID#: _____

Criminal Justice Support, Records
4 McGee Street, Suite 119
Greenville, SC 29601

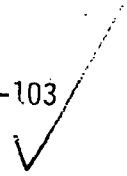
RETURN SERVICE REQUESTED

RECEIVED

MAY 19 2008

P.C.I. MAILROOM

NATHANIEL GLENN #303563
PERRY CORRECTIONAL INSTITUTE Q2B-103
430 OAKLAWN ROAD
PELZER SC 29669



FWD

ESBBR:11 29669



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Mr. Glenn,

As I explained on the phone, you must contact the Greenville Police Department for any questions regarding the disposal / destruction of evidence on your case.

Capt. Jinny Moran

A handwritten signature in black ink, appearing to be 'Jinny Moran', written over the printed name.

45

)
)
State of South Carolina)
)
County of Greenwood)

Affidavit of
Timothy Murray

I, Timothy Murray having been first duly sworn, testify and depose as follows:

1. On March 6, 2002, Chadwick Teasley was arrested for being in possession of a white powder substance that the officers tested to be positive for methamphetamine.
2. This incident occurred in the parking lot of the Parker Brothers Night Club off of Howell road in Greenville, S.C.
3. That night I was standing near the arrest incident and I was watching as Chad Teasley and his cousin was being arrested for the baking powder of which the officers had assumed was methamphetamine, and they were both charged with being in possession of illegal drugs.

4. Before the incident of their arrest had occurred, I personally knew that Teasley was not in possession of any illegal substance of Methamphetamine nor cocaine.

5. And several months after his arrest, all his charges were deposed of upon the circumstances that the white powder was lab tested to be no controlled substance.

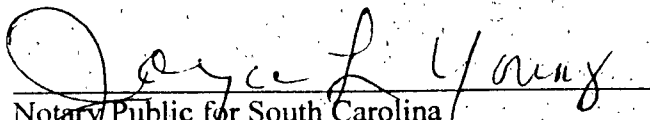
Wherefore, I certify that the above account of events are true and correct to the best of my recollection.



Timothy Murray
McCormick C.I.
386 Redemption Way
McCormick, S.C. 29899

Sworn to and subscribed before

me this 24 day of July, 2009



Notary Public for South Carolina

My Commission Expires: 8 28 2011

State of South Carolina,
Respondent.

vs.

Nathaniel Glenn, Jr., #303563,
Appellant.

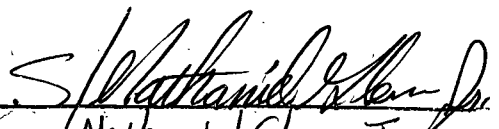
Case No: 2013-000919

Proof of Service

I certify that I have served the Record on Appeal on Jenny A. Kitchings, Clerk of S.C. Court of Appeals, P.O. Box 11629, Columbia, S.C. 29211 on Christina J. Catoe, Asst. Atty. Gen., P.O. Box 11549, Columbia S.C. 29211-1549 by depositing a copy of it in the U.S. Mail, postage prepaid, on the date of August 15, 2014.

cc: filed

Christina J. Catoe,
Asst. Atty. Gen.


Nathaniel Glenn, Jr.
Lee C. I.
990 Wisacky Hwy.
Bishopville, S.C. 29010

RECEIVED

AUG 21 2014

SC Court of Appeals

57

August 15, 2014

Dear Clerks Office:

May I please be
forwarded a clock-dated stamp
filed copy for my records
please.

Sincerely
Nathanial Lee

RECEIVED

AUG 21 2014

SC Court of Appeals