

Exhibit - B

LAW OFFICE OF

Kristy Grafton Goldberg, LLC

ATTORNEY AT LAW

February 19, 2015

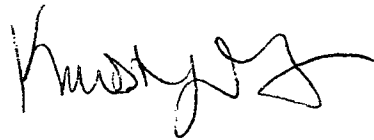
Rakeem Shali Hill, SCDC # 355085
Lee Correctional Institution
990 Wisacky Highway
Bishopville, SC 29010

RE: Hill v. State, 2013-CP-40-5121

Mr. Hill,

Please find enclosed the final order dismissing your post-conviction relief case. This ends your case and my representation. If you have any questions or need anything further please contact me at the above address.

Sincerely,



Kristy Goldberg

Date: May 20, 2010 Time: 1050 Place: 1 Justice Sq

I am Deion Leroy Lloyd-mitchell. My birthday is may 3 1992

My address and phone number are: 1451 Fort Jackson Rd Lugoff, SC 29074

I am giving this statement concerning murder 100009494

to Tal Pegram who has identified himself as Case investigator.

Q: asked by JW. Pegram

A: Answers by Deion L. Lloyd-mitchell

Q: Have you agreed to provide this statement without a lawyer present with the understanding that you don't have to speak to me or provide a statement?

A: Yes

Q: Have you asked me, Tal Pegram, to write this statement for you?

A: Yes

On April 9, 2010, Raheem Hill called and woke me up. We had a normal conversation. I told him that later on, I was going to Columbia to pick up my check. Raheem said "I'll ride with you". I called him later on to see if he was still going with me to get my check. He said he was still going and that he was at his brothers house. He told me to call when I got close to the apartment. He called me two more times wanting to know where I was.

The third time he called, I told him that I was about to pull up. I drove through the gate at Sage Point. He was standing outside on the sidewalk close to the front. I picked him up and then we

Sworn and subscribed to me this
20 day of May 2010

NOTARY PUBLIC OF SOUTH CAROLINA
MY COMMISSION EXPIRES: 3/12/2014

ISI Deion L. Mitchell

ISI _____

Deion Leroy Lloyd-mitchell received a copy of this statement consisting of 7 pages

from JW. Pegram ISI Deion L. Mitchell

COLUMBIA S.C. POLICE DEPARTMENT
STATEMENT CONTINUATION

left the apartment complex. We went to Rice Creek to pick up my check. After we leave Rice Creek, I take the interstate and go to Lugoff. While we were driving to Lugoff, Rakeem said that he wanted to use the truck, my Dad's truck, to go see Alaya. I'm not sure how to spell Alaya. Alaya is a female that Rakeem knows. He said that he would put gas in the truck. I said OK. He dropped me off at Keyshia's house in Lugoff. Rakeem took the truck and left. When Rakeem left, the sun was about to go down. When he came back, it was dark outside. Between the times Rakeem left and came back, Tyreek Robinson called me to see where I was at and told me a boy on Hwy 12 got killed. I called Rakeem to make sure it wasn't him and to see if he was OK. He said he was OK and that it was Jeremy who got killed. I said "That's messed up". I called Tyreek and told him that it was Jeremy. Tyreek said something like "Damn that messed up". Tyreek and his dad was on the way back to Keyshia's house from a basketball tournament. 10 minutes after they got back, Rakeem pulled up. me and Tyreek took Rakeem home. I went back to Keyshia's house. The next day, I went to Rakeem's house and he told me that he had a gun. He pulled a small black pistol w/ two clips out of ^{his} his pocket. The gun was a .45. He let me hold it. He told me that he was going to sell it. We went to Little China to get some food. Rakeem put the gun under his seat (Truck).

Sworn and subscribed to me this
 20 day of may 2018

 NOTARY PUBLIC OF SOUTH CAROLINA
 MY COMMISSION EXPIRES: 3/12/2024

ISI of Walt J. J. Mitchell

 ISI _____

Deion Leroy Lloyd-Mitchell received a copy of this statement consisting of 7 pages
 from Zur. Pegram ISI of Walt J. J. Mitchell

COLUMBIA S.C. POLICE DEPARTMENT
STATEMENT CONTINUATION

After we got our food and got back in the truck we left and I took Rakeem back to his house. I dropped him off. As he was getting out of the truck, I saw one of his bullets laying in the cup holder. I picked it up and handed it to him. I went back to Keyshia's house. On Tuesday, Rakeem called me about 5:00 in the morning. Rakeem said that he needed to talk to me. 10 minutes later he was at my house. He started saying that he didn't sleep last night and that he smoked 10 black and milds (Cigars). He started crying while talking about his sick grandma. He said that he had to come to Columbia make a statement about the murder. He said that he would pay me \$500.00 to make his statement. He told me to say that he didn't have anything to do with it. He said that he couldn't take the polygraph test. He kept shaking his head like he knew he was wrong. We left the house and rode around. While we were riding, he kept saying he would pay me \$500.00. At first, I was with it but I knew that I couldn't make the police think that I was him. Rakeem called the police and said that he was coming to Columbia. Rakeem's grandma called him and wanted to know where he was. She told him to come to the house, because his family wanted to come with him to make sure he made his statement. I took him to his house. Rakeem gave me wad of money and a bag of weed. Rakeem said he didn't want the police to take his money.

Sworn and subscribed to me this
20 day of May 20 10
 when Deion Leroy Lloyd Mitchell
 NOTARY PUBLIC OF SOUTH CAROLINA
 MY COMMISSION EXPIRES: 31122016

/S/ Deion L. L. Mitchell
 /S/ _____

Deion Leroy Lloyd Mitchell received a copy of this statement consisting of 7 pages
 from JAN. Pogran /S/ Deion L. L. Mitchell

COLUMBIA S.C. POLICE DEPARTMENT
STATEMENT CONTINUATION

I went to school I put the money and weed in a ziploc bag. I locked it up in the truck's tool box. Later on, Rakeem sent me a text asking "whats good". I asked him if he was alright. He said yes. I took him the money and stuff. He said that he was interrogated and didnt take the polygraph. He was telling me that Jo Jo, Trevor, Drew and His mother was somehow involved. He was saying that the police was trying to frame him and Drew. Later that week or the following week, the police showed up at my house. I got a call from an investigator called me and told me to come home. I get home and they ask me questions. But as I was walking to the house, Rakeem called me and told me to tell the police that he was with me and had the truck while I was in school. He told me to tell the police that he picked me up from school at 3:30pm. I told the police what Rakeem told me to say. A couple days later, the police got me from school and I went to the Kershaw Sheriff's Office I told some of the truth but most of it was a lie. The next time I talk to the police was this morning when they arrested me.

Sworn and subscribed to me this
20 day of May 20 10

NOTARY PUBLIC OF SOUTH CAROLINA
MY COMMISSION EXPIRES: 3/22/2014

/s/ Deion L. Mitchell

/s/

Deion Leroy Lloyd-mitchell

received a copy of this statement consisting of 7 pages

from CW. Pegram

/s/ Deion L. Mitchell

COLUMBIA S.C. POLICE DEPARTMENT
STATEMENT CONTINUATION

Q: On April 9, 2010, did you go to Percival Rd. (Sage Point) to meet Rakeem Hill?

A: Yes

Q: Did you see the cell phone documents that showed your location on April 9, 2010?

A: Yes

Q: Was the cell phone documents accurate?

A: Yes

Q: Did you pick Rakeem Hill up from Sage Point apartments on April 9, 2010?

A: Yes

Q: Prior to arriving at Sage Point, did Rakeem Hill tell you that he was at his brother's house?

A: I picked him up from the complex at a different building than his brother's

Q: What was Rakeem wearing?

A: Sweat pants, Tee shirt and sneakers

Q: Did Rakeem appear high or intoxicated?

A: Couldn't tell because I'm used to seeing him higher intoxicated

Q: The following day, did you see Rakeem in possession of a .45 cal pistol?

A: Yes

Q: Are you positive this pistol was a .45 cal?

A: Yes, from what he told me

Sworn and subscribed to me this
20 day of May 2010

NOTARY PUBLIC OF SOUTH CAROLINA
MY COMMISSION EXPIRES: 3/12/2014

/s/ Det. J. J. [Signature]

/s/ [Signature]

[Signature] received a copy of this statement consisting of 7 pages
from J.W. [Signature]

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COLUMBIA S.C. POLICE DEPARTMENT
STATEMENT CONTINUATION

Q: Was the bullet you picked up Large or Small?

A: Large

Q: Did Ra'keem pay you \$500.00 to lie to the police regarding his whereabouts at the time of the murder?

A: He offered me the money to make his statement and polygraph test.

Q: Did he want you to tell the police that you were the?

A: Yes

Q: Did you give a false statement to police regarding this investigation?

A: Yes

Q: Did you kill Jeremy Nanton?

A: NO

Q: Did you participate in Jeremy Nanton's murder?

A: NO

Q: Did you receive any of the monies or property stolen from Jeremy Nanton during or after this murder?

A: NO

Q: Who killed Jeremy Nanton?

A: Ra'keem

Q: How do you know Ra'keem killed Jeremy Nanton?

A: He had the Gun

Q: Did Ra'keem have any other property after the murder that he didn't have before the murder?

A: A Sprint Phone and the Gun

Sworn and subscribed to me this

20 day of May 2010

Deion L. Mitchell
NOTARY PUBLIC OF SOUTH CAROLINA
MY COMMISSION EXPIRES: 3/12/2014

/s/ Deion L. Mitchell

/s/

Deion Leroy Lloyd-Mitchell

received a copy of this statement consisting of 7 pages

from J.W. Pegram

/s/ Deion L. Mitchell

COLUMBIA S.C. POLICE DEPARTMENT
STATEMENT CONTINUATION

Q: Is there anything in this statement that you want to add or change?

A: NO

Q: Is everything in this statement true?
Yes

[This section of the document is crossed out with a large diagonal line.]

Sworn and subscribed to me this
20 day of May 20 10

NOTARY PUBLIC OF SOUTH CAROLINA
MY COMMISSION EXPIRES: 3/12/2014

ISI Deion L. Mitchell

ISI

Deion Leroy Lloyd-Mitchell received a copy of this statement consisting of 7 pages

from ILW. Program

ISI Deion L. Mitchell

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Honorable J. Ernest Kinard, Jr., Presiding Judge

Case No: 2013-CP-40-5121

Rakeem S. Hill Appellant,
S.C.D.C. 355085

v.

The State Respondent.

PROOF OF SERVICE

I, Rakeem S. Hill, Appellant hereby certifies that service of my NOTICE OF APPEAL along with attached Exhibits, marked as Exhibits: A, B, C and D, attached certificate of service and PROOF OF SERVICE was made upon the following by placing same

in the United States Mail, via, McCormick
Correctional Institution Mail-room Personnel,
First-Class postage having been prepaid
this 12 day of March, 2015, and addressed
as follows:

South Carolina Supreme Court

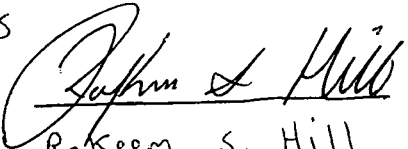
Attn: Clerk

P.O. Box 11330

Columbia, South Carolina 29211

McCormick, South Carolina

This 12 day of March, 2015


Ra'Keem S. Hill

McCormick Correctional Inst.

386 Redemption Way

McCormick, South Carolina 29899

Proceeding Pro se

Exhibit - D

INFO, INC.
Investigations

Post Office Box 5415
Columbia, SC 29250
phone (803) 331-1968
fax (803) 781-8597

Rakeem Hill Report

May 15, 2014

Deion Mitchell
1451 Ft. Jackson Road
Lugoff, South Carolina
(803) 420-4798

This afternoon, I met with Deion at the McDonald's in Lugoff, South Carolina. He informed me that he has known Rakeem Hill since before he (Deion) moved to South Carolina when he was 13 years old. When Deion would come to visit family during the summers in South Carolina, he would also visit with his friend Rakeem.

According to Deion, on the morning of the incident, he was sleeping at Keisha's (cousin) house when Rakeem called. They talked. Rakeem was going to ride with Deion later on so that Deion could pick up his paycheck from Great Clips off of Hard Scrabble Road (in the Food Lion parking lot).

Later on, Deion picked Rakeem up at Rakeem's brother's apartment at Sagebrush Apartments. Deion was driving his dad's Toyota Tundra. They picked Deion's check up at Great Clips and then stopped for gas at either the BP or Kangaroo at the light near Great Clips. Rakeem waited in the truck. While inside, Deion spoke with his brother on the phone because he specifically remembers commenting on purchasing a pink lemonade.

Then, they headed back to Lugoff. It was late afternoon, but before sundown. They went to Keisha's house and then Deion let Rakeem borrow the truck. Deion stayed at Keisha's house. At first, nobody was home, but then about 30-45 minutes later, Alma Roberson (B/M, a relative) arrived. They turned the news on and Deion heard that Jeremy Nanton had been killed on Highway 12. Deion recognized the name as a guy that grew up with

Rakeem and Rakeem's brother. And, Highway 12 is a road that they drive up and down all of the time. Concerned about Rakeem and the truck, Deion called Rakeem and asked if Rakeem was okay. Rakeem sounded completely normal...nothing was out of the ordinary. Deion told Rakeem what had been on the news.

A couple of days later, the police came to Deion's grandmother's house. Deion told them that on the day of the incident, he had been in school. He hadn't...it was spring break. The 2nd contact with police was when they came to Deion's school. The 3rd contact he had with authorities was when they called. Deion and his father went to the station. It was then that Deion told the police that he had seen Rakeem with a gun. The 4th contact with police was when they came to arrest Deion, waking him up with guns in his face.

Deion informed me that he told police that he had seen Rakeem with money, a gun and weed before, but Deion didn't mean on the day of the incident. They were friends and saw each other every day...they were like brothers.

(When Deion gave his Statement, Deion talked while the officer wrote it. At the time, Deion was 17 years old and had just had a son and simply wanted to go home. The police officer told Deion that if he (Deion) told him (officer) who had committed the crime, then Deion could go home. So when the officer asked how Deion knew that Rakeem had done it, Deion said that he'd (Rakeem) shown him (Deion) a gun. It was the officer that described the pistol that was supposedly used).

Deion explained that he told his public defender, Luke Shealey, that he (Deion) wanted to change his Statement about incriminating Rakeem. Mr. Shealey told Deion to just wait it out, see what happened. Mr. Shealey told Deion that at trial, if Deion wanted to change his story, he could do it then.

When asked if he ever met with the prosecution, Deion said that he had. He indicated that he was transferred for the meeting and felt like Mr. Shealey was trying to play both sides...telling Deion that he (Deion) didn't have to say anything about the incident he (Deion) and Rakeem had been charged with and then turning around telling the prosecutor that he (Deion) would cooperate. And, in all honesty, Deion indicated that he really just wanted to go home and would have said whatever to make that happen. Deion maintains that he would have gone along with what the prosecutors wanted him to say to be able to go home, but then on the stand, he had absolutely no intention of testifying against Rakeem...they just didn't necessarily know that.

Deion informed me that he met with the prosecutors one time. He was also transferred out for 2 separate lie detector tests (failed both) at SLED and on Two Notch Road. And, although Deion initially waived bond, he did have at least 2-3 subsequent bond hearings. The last bond hearing was on a Friday. Deion was transferred to the holding cells beneath

the Courthouse. During the hearing, Jeremy's mother told the Judge that she was afraid for her life and requested no bond. The Judge agreed. Deion was taken back to the holding cell. Not long after, Mr. Shealey came to speak with him. Mr. Shealey told Deion that he (Deion) would get a bond on Monday, that Mr. Shealey had indicated that Deion had agreed to cooperate. Deion was taken back to RCDC. On Monday, without having to go back to Court, Deion was granted a bond. His father posted it that Wednesday...after being in the county jail for 10 months.

Deion indicated that he would be more than willing to provide a new Statement. He feels responsible that because of his statements to authorities, Rakeem is in jail. When asked why he thought that Rakeem pled, Deion said that Rakeem probably felt that he (Deion) would testify against him (Rakeem).

Although reluctant, Deion informed me that he would come to Court, if HE HAD TO, and admit that he lied in the statement he gave to authorities. If it would help overturn Rakeem's conviction, Deion would testify.

****Special Notes****

1. At the time of the incident, Deion's father resided in New York. Because of a falling out with his grandmother, at the time, Deion was living with his cousin, Keisha Roberson, who lives in Lugoff.
2. Deion had let Rakeem borrow his (Deion's) father's truck before, but not often.
3. Deion has never been in trouble before. Being arrested in connection with Jeremy's death was the first time he'd been arrested.
4. After Deion and Rakeem were arrested, they talked in the county jail (they have also talked a couple of times on the phone since Deion was released). Knowing that he had not spoken with the police, given a Statement and always maintained that he did not know anything about Jeremy's death, Rakeem asked Deion why he (Deion) was talking to the police and giving false Statements about the day of the incident.
5. Deion has never met or spoken with/to Jeremy's mother.
6. Deion denies ever having called Jeremy. He only knew Jeremy because he (Jeremy) was Deion's 1st cousin's cousin.

Mr. Rakeem S. Hill

McCormick Correctional Inst.

386 Redemption Way

McCormick, South Carolina 29899

South Carolina Supreme Court

Attn: Clerk

P. O. Box 11330

Columbia, South Carolina 29211