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STATE OF SOUTH CAROLINA  
In The Supreme Court

JUL 27 2015

Appeal From Beaufort County  
Carmen T. Mullen, Circuit Court Judge

S.C. Supreme Court

2012-CP-07-2219

Solomon Anderson, Appellant,

v.

State of South Carolina, Respondent.

### DENNISON RESPONSE

Appellant generates, makes and submits the response here in support of the appeal herein:

1. Was There Territorial or Geographical Jurisdiction by Court and Law Enforcement Official(s)?
2. Has Anderson Illegal Sentence Expired?
3. Circuit Court Erred Failing to Grant Hearing?

The lower court enter a final order of dismissal in this APERB contrary to the High Court recent holding in McCoy v. State, 737 S.E.2d 623, 626 (2013). There was the absence of territorial and/or geographical jurisdiction by the Court. The circuit court judge erred finding Detective Ledell Chisolm Grice's testimony (p.3) credible or-

er Anderson's point to arrest warrant no. C852617 which set forth "Callawassie General Store located on Hwy. 170 exit, Ridgeland, S.C." it is located off highway prior to entering Callawassie Island which is Beaufort County.

According to McCoy the PCR judge erred making his finding when the evidentiary hearing was denied. Even the allege victim testified the store was located in Ridgeland, S.C. and that is Jasper County, South Carolina so the Court of General Sessions did not have jurisdiction to go forward with void indictments. Anderson received a thirty (30) year sentence on the indictment for kidnapping. When Varner raised the issue of a 30 year sentence for kidnapping offense in State v. Varner, 423 S.E2d 133, 134 n. 3 (1992) decision.

This Court held Varner had to be sentenced to life, there is no difference in the date and time of Anderson's kidnapping and Varner's offense so appellant was not lawfully sentenced for kidnapping which suggests he had no sentence what-so-ever. The 30 year CSC sentence has expired so he should be released forthwith. There was the actual ineffective assistance of criminal defense counsel in the COD and counsel would render ineffective assistance where law

Was not inquired (investigated) into.

Counsel failed to object to 30 year sentence for kidnapping and the victim testified in two (2) criminal trials that she worked in Ridgeland, S.C. and she telephoned Beaufort, S.C. for her future husband and was employed at Beaufort County Law Enforcement Center.

### CERTIFICATE OF SERVICE

The undersigned certifies that he has cause true and correct copies of the 'DENNISON RESPONSE' to be mailed, postage prepaid, to respondent's attorney,

Office of the Attorney General

Elizabeth H. Neyle, Esq.

PCR Division

POB 11549

Columbia, SC 29211

This 22 day of July 2015

3-

S/ Solana Anderson

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### PROOF OF SERVICE

Anderson hereby certifies that he served the 'Notice of Appeal' on respondent [State] by placing an envelope in U.S. Mail, postage prepaid, contain said Notice of Appeal, addressed thereto Elizabeth W. Neyle, PLR Division, POB 11549, Columbia, SC 29211 the 22<sup>nd</sup> day of July 2015

He served the 'Notice of Appeal' to Terri Ann Roseneau through U.S. Postal Service, at PO Drawer 1120, Beaufort, S.C. 29901 the 22 day of July 2015

July 22, 2015

