

AUG 17, 2015

RECEIVED

THE SUPREME COURT OF SOUTH CAROLINA
DANIEL E. SHEAROUSE, CLERK OF COURT
P.O. BOX 11330
Columbia S.C. 29211

AUG 20 2015

S.C. SUPREME COURT

Re: ANTHONY MAURICE LOUNDS V. STATE

Dear CLERK:

I'm Compelled to Write your office due to the Fact I did not receive a Fair bite of the Apple or a bite of the Apple, Trial Transcript of record I received from Appellant Counsel on November 22, 2011 was incomplete.

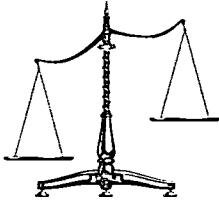
I Proceeded to PCR hearing held on October 21, 2014. My trial Counsel asserted at the PCR hearing that his Investigator MR. PAUL SILVAGGIO had investigated my case. I contacted MR. SILVAGGIO once I returned back to the institution and informed him of ATTORNEY'S SCOTT Robinson's testimony during my PCR hearing. MR. SILVAGGIO contacted my PCR Counsel MR. MILLS ARIAIL and Forwarded me a letter he had sent to PCR Counsel. I sent the letter to Karen Ratigan, and to the PCR Judge. My PCR was dismissed on December 19, 2014. My PCR Counsel Filed Notice of Appeal with your office

On January 12, 2015. I Forwarded MR. SILVAGGIO Copies of my discovery at his request, to see what aspect of my case he had investigated. Enclosed please find MR. SILVAGGIO response. Further I kept communicating with the former investigator of trial counsel and I communicated with another former investigator of trial counsel, and I received a copy of the trial transcript held on July 12, 13 of 2011. I reviewed the transcript I received from former investigator, and notice that pages were missing from the transcript I received from appellant counsel in November 22, 2011, AFTER further review of the transcript received from former investigator I notice trial judge denied my right to trial by impartial jury of no more than 12 persons. Trial judge failed to discharge alternate juror before case was submitted to jury for deliberation. I contacted my appellant counsel on June 20, 2015. I informed her my transcript I received from appellant counsel was incomplete, that I had received complete transcript of record. I informed her I was denied my right to trial by impartial jury, trial judge had failed to discharge alternate juror before case was submitted to jury for deliberation. I advised my appellant counsel to motion the court for leave due to the fact I did not receive bite of the apple with an incomplete transcript of record and I want to have that issue addressed and adjudicated.

I could not have discovered issue with out complete transcript of record therefore I was denied my bite of the Apple without a complete transcript, could not have raised issue during First PCR. On July 30, 2015 I placed in the U.S. mail addressed to the Clerk of Court (Greenville) A PCR Form 5 Application along with attachments, along with DAY 2 of July 13, 2011 transcript of record received from Appellant Counsel, and DAY 2 of July 13, 2011 transcript of record received from PCR Counsel which he advised me, he received from the ATTORNEY GENERAL'S OFFICE incomplete as well. I filed PCR on NEWLY DISCOVERED EVIDENCE and ASK that my Appellant Counsel Wanda H. CARTER File motion to leave/hold case ABEYONCE § 17-27-45 (c) NEWLY DISCOVERED EVIDENCE, can be addressed, and adjudicated due to incomplete transcript of record. Could not have raised issue during First PCR, didn't realize transcript was incomplete until June 9, 2015. I Thank you in advance and certainly look forward to hearing from your office regarding the request above.

Sincerely

ANTHONY M. LOUHDS # 227456
McCormick Corr. Inst F2 B-125
386 Redemption Way
McCormick S.C. 29899.



SILVAGGIO INVESTIGATIONS, LLC
When a Strong Defense is NOT Negotiable

November 17, 2014

Mr. Anthony Lounds [Inmate# 227456]
McCormick Correctional Institute [FzA185]
386 Redemption Way
McCormick, South Carolina 29899

Re: Your Request For A Rebuttal Affidavit As To Attorney Scott D. Robinson's PCR Testimony

Anthony,

I have not been privileged to have possession of your case file since the one that I had was turned over to Attorney Scott Robinson back in 2011, prior to your Trial. Not having the file to review, I can't begin to tell you what and what not I was involved with as it pertained to the various aspects of your case. The Private Investigator out of Columbia, South Carolina was working with your Attorney at the time in this matter. This was over three (3) years ago and I really would like to be able to review your file before I can commit either way as to what I was able to accomplish and what I was not able to accomplish in your case.

I can tell you this, if your Attorney asserted that I investigated your case for trial all the way up to and through the trial, that would be incorrect. As I stated in my April 29, 2012 letter to you:

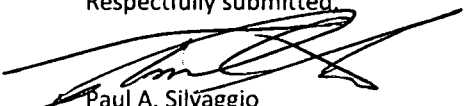
'Regarding your recent convictions, I was involved in your case as you were under indigent status. After my company, Silvaggio Investigations LLC, moved from the area of the Scott D. Robinson Law Firm I no-longer was able to work on your case. Upon my making such a business decision, the Attorney / Investigator relationship was immediately severed; therefore I no longer had the authority / ability to proceed with your defense investigation. I understand through you that you had an investigator out of Columbia, South Carolina working with your attorney – Mr. Robinson in this matter.'

Until I am able to review your file, I will be unable to submit an Affidavit either way. You mentioned that you provided this information to your PCR Attorney but I will tell you that I was never contacted by your PCR Attorney – Mr. Mills Ariail in this matter.

Anthony I know that my association with the Scott D. Robinson Law Firm was severed at the end of April 2011 following the trial in the matter of State vs. Yates Walter Wyant out of Oconee County.

Should you have any questions of me, please feel free in calling upon me at (864) 569-8382, email at: paul@silvaggioinvestigations.com and / or via the United States Postal Service at the address listed below.

Respectfully submitted,


Paul A. Silvaggio
Licensed Private Investigator [State of South Carolina]
GCSO – Homicide Supervisor [Retired]

Cc: File



SILVAGGIO INVESTIGATIONS, LLC
When a Strong Defense is NOT Negotiable

March 17, 2015

Mr. Anthony Maurice Lounds [Inmate# 227456]
McCormick Correctional Institute F2 B-125
386 Redemption Way
McCormick, South Carolina 29899

Re: Documents you sent and now being returned to you

Anthony,

I respect your position in this matter and yes I will and always have told the truth. There is nothing in this world more important than ones name and integrity.

As to your sister –Janet Lounds, I never refrained from taking your calls nor her calls but I will not tolerate your sister’s disrespect with her loud and boisterous tone toward me. Your sister’s actions are not a reflection of you and I certainly do not hold you accountable for her actions.

The documents that you sent me and are enclosed with this letter are as follows:

-) Two page Letter from Anthony Maurice Lounds [Dated: February 25, 2015]
-) One page Report from the GCSO – MD Gladson [Dated: September 05, 2009]; 09-142228
-) One page Supplemental Report from the GCSO – DEP Leppard [Dated: October 01, 2009]; 09-142228
-) One page Warrant [I-343242] [Dated: September 29, 2009]; Armed Robbery
-) One page Information Sheet [Dated: September 17, 2009]; Forgery
-) Two page Letter to Attorney Nihar Patel from Assist Sol Campbell [Dated: November 30, 2010]
-) One page Warrant [I-343243] [Dated: September 29, 2009]; Weapons Possession
-) Two page Report from the GCSO – MD Gladson [Dated: September 05, 2009]; Armed Robbery
-) One page Signed Statement of Brian Workman [Dated: September 29, 2009]; 09-142228
-) One page Wanted Flyer of Anthony Maurice Lounds
-) One page depicting check # 1172 [Check Dated: September 06, 2009]; acct of Bryan Workman
-) Two page Supplemental Report of Investigator King [Dated: October 05, 2009]; 09-142228
-) One page Supplemental Report of Investigator King [Dated: September 24, 2009]; 09-142228
-) One page Incident Report of Investigator Martin [Dated: October 01, 2009]; 09-148908

After reviewing each of the documents noted above, I do not recall the incidents named. There is a very good likelihood that I did not perform a Defense Investigation as the ‘Staff Investigator’ and not as a contracted Private Investigator. This being a result of the fact that I did not retire from the Greenville County Sheriff’s Office until November of 2009 while the documents authored above are, in majority, dated prior to my retirement. I would have conflicted the above matters with your Attorney Scott Robinson, therefore I would not have worked the Defense Investigation.

Respectfully submitted

Paul A. Silvaggio
Licensed Private Investigator [State of South Carolina]
GCSO – Homicide Supervisor [Retired]

ANTHONY M. LOUNDS # 227456

M^cCORMACK CORR. INST. F2 B-125

886 Redemption Way

M^cCORMACK S.C. 29899

THE SUPREME COURT OF SOUTH CAROLINA

DANIEL E. SHEAROUSE, CLERK OF COURT

P.O. Box 11330

Columbia S.C. 29211

SEP 1 2015

MCCI
MAIL ROOM

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THE DEPARTMENT OF CORRECTIONS HAS NOT
INSPECTED OR CENSORED THIS FILM. THEREFORE,
THE DEPARTMENT DOES NOT ASSUME RESPONSIBILITY
FOR ITS CONTENTS.

McCORMICK CORRECTIONAL INST
S.C. DEPARTMENT OF CORRECTIONS