

SUPREME COURT OF SOUTH CAROLINA
DANIEL E. SHEAROUSE, CLERK OF COURT
POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA

29211

RECEIVED

AUG 28 2015

S.C. SUPREME COURT

AUGUST 25, 2015

RE: APPEAL

MOTION FOR PRO BONO ADDENDUM
HONORABLE JUDGE EARLY
SECOND JUDICIAL CIRCUIT COURT
AIKEN, SOUTH CAROLINA 29802

ATTN: HON. DANIEL E. SHEAROUSE
CLERK OF COURT

1. ENCLOSED IS AN APPEAL FROM GENERAL SESSIONS COURT, 2nd JUDICIAL CIRCUIT COURT, 109 PARK AVE, AIKEN, SOUTH CAROLINA 29802, HONORABLE JUDGE EARLY, CHIEF ADMINISTRATIVE JUDGE FOR ALL PURPOSES.
2. ALSO ENCLOSED "CLEAN PROGRAM" P.O. BOX 2493, AUGUSTA, GA, 30903.
3. MOTION FOR PRO BONO ADDENDUM - C.C.P & GS. AUGUST 10, 2015

RESPECTFULLY SUBMITTED:

Alvon Bennett 940091
Alvon Bennett 940091

STATE OF SOUTH CAROLINA
COUNTY OF AIKEN
ALVON BENNETTE # 940091
PETITIONER.

RECEIVED

AUG 28 2015

SUPREME COURT OF SOUTH CAROLINA
P.O. BOX 11330
COLUMBIA, SOUTH CAROLINA 29211

WARRANT # 2015-A 210200343

VS.

ATTORNEY DE GRANT GIBBONS
2ND JUDICIAL CIRCUIT
PUBLIC DEFENDERS OFFICE
AIKEN, SOUTH CAROLINA
RESPONDANT.

S.C. SUPREME COURT

APPEAL
MOTION FOR PRO BOND
ADDENDUM FROM
HON. JUDGE EARLY, 2ND JUDICIAL CIRCUIT
AIKEN, SOUTH CAROLINA

NOW COME ALVON BENNETT # 940091 LOCATED AT AIKEN COUNTY DETENTION CENTER, 435 WIRE RD., AIKEN, SOUTH CAROLINA 29801. INVOKES THE EXTREME SANCTION FOR AN APPEAL - MOTION FOR PRO BOND ADDENDUM PRESIDING JUDGE EARLY, 2ND JUDICIAL CIRCUIT, AIKEN, SOUTH CAROLINA 29802.

FACTS.

- 1.) ON AUGUST 25, 2015 PETITIONER ALVON BENNETT APPEARED BEFORE THE HONORABLE EARLY, 2ND JUDICIAL CIRCUIT COURT, 109 PARK AVE., AIKEN, SOUTH CAROLINA 29802. FOR MOTION FOR PRO BOND ADDENDUM. HONORABLE JUDGE EARLY DENIED PETITIONER ALVON BENNETT MOTION.
- 2.) PETITIONER ALVON BENNETT FIRST PETITION "THE SUPREME COURT OF SOUTH CAROLINA - OFFICE OF DISCIPLINARY COUNSEL", ON JULY 13, 2015. VIOLATION OF SOUTH CAROLINA RULES OF COURT - RULE 407 - PROFESSIONAL CONDUCT. ON JULY 22, 2015 PETITIONER ALVON BENNETT VS. ATTORNEY DE GRANT GIBBONS, ESQUIRE, CASE NUMBER 15-DE-L-0786 WAS DENIED FOR REASONS OF JURISDICTIONAL MATTERS.
- 3.) "CLEAN PROGRAM" ENCLOSED IN THIS DOCUMENT. AVAILABLE TO PROBATION AND PAROLEES IN AUGUSTA, GA. P.O. BOX 2493 # (706) 724-6960. PETITIONER ALVON BENNETT IS CURRENTLY ON ONE YEAR PAROLE, IN GEORGIA. FROM 9-22-14 UNTIL 9-16-15 UPON COMPLETION OF PAROLE PETITIONER IS ON BYRS. PROBATION IN GEORGIA. ATTORNEY DE GRANT GIBBONS IS AWARE OF THIS BUT INSIST DO NOT HELPING PETITIONER WITH SUBSTANCE ABUSE ADDICTION, BY RECOMMENDING SUBSTANCE ABUSE AND FAITH BASE TREATMENT PROGRAM.
- 4.) ATTORNEY DE GRANT GIBBONS WAS APPOINTED BY THE STATE OF SOUTH CAROLINA TO REPRESENT PETITIONER ALVON BENNETT ON MARCH 11, 2015. AT NO TIME SINCE APPOINTMENT DID ATTORNEY

III

DE GRANT GIBBONS DELIVER THE PETITIONER RULE 5 (MOTION OF DISCOVERY). PETITIONER ALVON BENNETT IS ENTITLED TO ALL DOCUMENTS, EVIDENCE WHICH THE STATE OF SOUTH CAROLINA WILL USE IN A TRIAL AGAINST HIM.

- 5.) PETITIONER ALVON BENNETT REQUESTED TO BE EXAMINE BY A PSYCHIATRIST PURSUANT TO THE MENTAL INCOMPETENCY RULE. ATTORNEY DE GRANT GIBBONS STATED: "AT THE TIME OF YOUR ARREST WERE YOU EATING GRASS". I KNOW AIN'T NOTHING WRONG WITH YOU. ALL THEY ARE GOING TO DO IS TAKE YOU UP THERE, AND BRING YOU RIGHT BACK.
- 6.) PETITIONER ALVON BENNETT WAS DIAGNOSE WITH PARANOIA SCHIZOPHRENIA IN 1993. SERVED IN SOUTH CAROLINA DEPARTMENT OF CORRECTIONS - GILLIAM PSYCHIRATIC CENTER, KIRKLAND CORRECTIONAL INSTITUTION, COLUMBIA, SOUTH CAROLINA 29321. PETITIONER ALVON BENNETT RECEIVED A DISABILITY CHECK FROM SOCIAL SECURITY ADMIN, FOR HIS MENTAL CONDITION.
- 7.) ATTORNEY DE GRANT GIBBONS DOESN'T HAVE A PSYCHIATRIST MEDICAL DEGREE. HOW THEN CAN HE DETERMINE MY STATE OF MIND?
- 8.) ATTORNEY DE GRANT GIBBONS HAS FELL BELOW THE STANDARD OF HIS PROFESSION IN VIOLATION OF SOUTH CAROLINA RULES OF COURT - RULE 407- PROFESSIONAL CONDUCT:
 - A) NOT TRUSTWORTHY
 - B) DISHONEST
 - C) LACK OF DUE DILIGENCE
 - D) LIER...

WHEREFORE PETITIONER PRAYS THAT:

- (1) THAT THIS HONORABLE SUPREME COURT WILL GRANT THIS APPEAL.
- (2) WHATEVER THIS HONORABLE SUPREME COURT DEEMS JUST, PROPER, AND FAIR.
- (3) PETITIONER ALVON BENNETT IS ENTITLED TO AN EFFECTIVE REPRESENTATIVE PURSUANT TO UNITED STATES CONSTITUTION 6th AMENDMENT.

IV

I'M DEEPLY APPRECIATIVE FOR THIS HONORABLE SUPREME COURT TIME
AND COOPERATION IN THIS MATTER...

"SO THAT THE ENDS OF JUSTICE SHALL BE MET..."

AIKEN, SOUTH CAROLINA
MED: AUGUST 25, 2015

RESPECTFULLY SUBMITTED

Alvon Bennett #940091

PETITIONER ALVON BENNETT #940091
AIKEN COUNTY DETENTION CENTER E-POD
435 WIRE RD.

AIKEN, SOUTH CAROLINA

29801

CERTIFICATE OF SERVICE

I CERTIFY THAT THE FOREGOING APPEAL MOTION FOR PRO BONO ADDENDUM, WAS DELIVERED BY UNITED STATE POSTAL SERVICE VIA STAMP ADDRESS ENVELOP FIRST CLASS MAILED!

TO: SUPREME COURT OF SOUTH CAROLINA
DANIEL E. SHEARDUSE, CLERK OF COURT
P.O. BOX 11330
COLUMBIA, SOUTH CAROLINA 29211

FROM: ALVON BENNETT # 940091
AIKEN COUNTY DETENTION CENTER E-POD
435 WIRE RD.
AIKEN, SOUTH CAROLINA 29801

RESPECTFULLY SUBMITTED:

Alvon Bennett

CLEAN PROGRAM

(Overview)

Psalms 119:9

***Wherewithal shall a young man cleanse his way?
by taking heed thereto according to thy word.***

This program utilizes God's Word
to dig deep down to the root of addictions
and incorporates the value of choices and decisions.

This program requires a minimum of 90 days live-in status,

at which time we have encourage men
to have found employment, transportation, and housing.

Then for the next 9 months the programmers must attend

the weekly meetings, group sessions, counselling,

as well as be faithful to a local church.

- Please fill out all enclosed documents and return them in the self-addressed envelope
- If you are currently incarcerated in a county jail / detention center return documents to your chaplain who will contact the GCRM to pick-up documents on site.

P.O. BOX 2493 • AUGUSTA, GA 30903 • 706-724-6960 • FAX: 706-724-6967

Garden City Rescue Mission Probation / Parole Policy

The following statement is the standing policy for our guests on probation or parole, or any guest who chooses to use this address as their temporary residence.

WE ARE NOT a Faith based facility. We are a Christian; Bible based ministry outreach effort of many fundamental churches and likeminded individuals and business owners.

Currently, we are unable to house any sex-offenders, or individuals who require physical or medical assistance in any capacity.


Although we are opening up our doors to help men paroling out of prison, all parolee's and programmer's (men agreeing to our program) need to be aware of the environment they are entering into. We are operating this program in addition to the primary ministry of our facility; which is a 90 day overnight emergency shelter. Programmer's need to be aware that we have other guests who are not in our program. These guests are allowed to stay for their first 30 days consecutively for free, and after the 30 day period guests are required to pay \$5.00 per night. All guests are required on Sundays and Thursdays to attend Church with us at Victory Baptist Church in N. Augusta, Sc. Transportation by bus is provided and the \$5.00 nightly fee is waived for these nights. All guests are required to attend Chapel services nightly. All of our guests are required to sign a waiver releasing the Mission and all of our supporters from any and all liability. It is also our requirement that each guest read and submits to the rules and leadership of this facility. All guests are responsible for all of their personal health and dental needs, as well as transportation.

Programmer's (our guests on parole using our address), will agree to submit to our program rules, the time frames of our three phases, and leadership of this ministry. If at any point a programmer refuses to comply to our system, that individual will then be treated as a regular guest, will be held to the 90 day limit, will be required to pay the nightly fee, and could be asked to leave the premises and his parole officer contacted. Those who decide to be part of our program, will enjoy being part of a ministry that is helping others, while God is helping them.

WHAT WE DO. Although our intake policy is very limited, it is the goal of the ministry to provide a safe, loving, caring, clean environment for people to hear and receive the Gospel of Jesus Christ. It is our Goal to see men come into a real relationship with the Lord Jesus. Although our staff and resources are limited, it is our Goal to help each man face and work through all the problems they come to us with, to the best of our ability. With the limited resources we have, we have found we can best help those who want to have a life that will honor God. An individual who follows the Lord obtains favor of the Lord, but with God all things are possible.

We do give special consideration to those who try their best, to those who are the most humble.

I acknowledge that I have read, understand, and agree to the Garden City Rescue Mission Probation / Parole Policy:

Signature 

Date 8-25-15

COPY: SOL, Pub. Of. Ofc
Judge Early

STATE OF SOUTH CAROLINA)
COUNTY OF AIKEN)
ALVON BENNETT #940091)
PETITIONER.)

IN THE COURT OF GENERAL SESSIONS
SECOND JUDICIAL CIRCUIT
WARRANT NO. #2015-210200343

VS.

ATTORNEY DE GRANT GIBBONS)
2ND JUDICIAL CIRCUIT)
PUBLIC DEFENDER OFFICE)
AIKEN, SOUTH CAROLINA)
RESPONDANT.)

MOTION FOR PRO BONO
ADDENDUM

FILED
CLERK
C.C.P.R.G.S.
Deputy Clerk
6/3

FACTS

ATTORNEY DE GRANT GIBBONS INFORMED CLIENT ALVON BENNETT THAT DUE TO THE FACT THAT THERE IS A PAROLE HOLD AGAINST HIM. CLIENT ALVON BENNETT CAN NOT BE ABLE TO GO TO A SUBSTANCE ABUSE PROGRAM.

(1.) ON JULY 8, 2015 JEREMY JOHNSON WHO IS A CLIENT OF ATTORNEY DE GRANT GIBBONS. WAS ON PROBATION FOR MANUFACTURING METH, AND ON HIS 3RD MANUFACTURING METH OFFENSE FACING 25 YRS WHILE BEING A CLIENT OF ATTORNEY DE GRANT GIBBONS RECEIVED A SUBSTANCE ABUSE PROGRAM IN NORTH CAROLINA, \$3,500. ATTORNEY DE GRANT GIBBONS KNEW OF THE PROBATION HOLD.

(2.) NOW DERRICK RAY WAS ON PAROLE VIOLATION IN ORANGEBURG, SOUTH CAROLINA FOR SHOPLIFTING OFFENSE. DERRICK RAY HAD 3 NEW SHOPLIFTING OFFENSE AND HAD A PAROLE HOLD ON HIM. ATTORNEY DE GRANT GIBBONS REPRESENTED CLIENT DERRICK RAY, WHILE KNOWING ABOUT DERRICK RAY PAROLE VIOLATION AND THE 3 NEW SHOPLIFTING OFFENSES. WHEN DERRICK RAY WENT TO COURT ATTORNEY DE GRANT GIBBONS HAD THE PROGRAM U-TURN

II

FOR CHRIST LOCATED IN LEXINGTON, SOUTH CAROLINA - FAITH BASE PROGRAM FOR ADDICTS CALL HIM AND CLIENT DERRICK RAY RECEIVED THE SUBSTANCE ABUSE PROGRAM U-TURN FOR CHRIST AT AIKEN COUNTY 2ND JUDICIAL CIRCUIT, COURT HOUSE.

"HOW THEN CAN THEY RECEIVE HELP FOR ADDICTION BUT REFUSE TO HELP ME??? ATTORNEY DE GRANT GIBBONS HAS SHOWN HOW HE REFUSES TO HELP ME WITH MY ADDICTION!"

ATTORNEY DE GRANT GIBBONS ON JULY 2, 2015 TOLD ME THAT HE PERSONALLY CALL UP THE PROGRAM I WAS EXCEPTED AT "CLEAN PROGRAM". THE PROGRAM STAFF TOLD ATTORNEY GIBBONS I CAN ONLY STAY THERE 90 DAYS. I HAVE THE EVIDENCE WITH ME (PAPER DOCUMENTS) TO SHOW THAT THIS IS A LIE. THE PROGRAM MINIMUM IS 90 DAYS NOT MAXIMUM BUT THE MAXIMUM IS ONE YEAR. THE U-TURN FOR CHRIST PROGRAM IS A MAXIMUM OF 8 MONTHS. ATTORNEY DE GRANT GIBBONS INFORM ME THAT A YEAR IS NOT ENOUGH. BUT MR. DERRICK RAY CAN GO TO THE "U-TURN PROGRAM FOR 8 MONTHS. THIS SHOWS THAT MR. DE GRANT GIBBONS DOESNT HAVE MY BEST INTEREST AT HAND TO HELP ME.

ON JULY 6, 2015 I TALKED WITH A.C.D.C.-CHAPLAIN MORRIS WHO TOLD ME THAT THE ABOVE MENTIONED TIME LIMIT OF 90 DAYS IS NOT TRUE. THE "CLEAN PROGRAM" WILL HOUSE YOU UP TO A YEAR IF NEED BE. CHAPLAIN MORRIS KNOWS BECAUSE HE FOUNDED THE PROGRAM BACK IN NEW YORK AND BROUGHT IT TO SOUTH CAROLINA. ATTORNEY DE GRANT GIBBONS STILL REFUSE TO HELP ME WITH MY ADDICTION PROBLEM. ALTHOUGH HE HELPED JEREMIAH JOHNSON, DERRICK RAY GET INTO DRUG PROBLEM KNOWING THAT THEY HAD PAROLE AND PROBATION HOLD ON THEM.

On July 16, 2015 Richard Rowan was sentenced to a "FAITH BASE PROGRAM" called the "POTTER HOUSE" in Georgia, for a period of one year. He was charged with 2nd offense MANUFACTURING METHAMPHETAMINE WITH INTENT. PUNISHABLE BY 5 YRS. TO 30 YRS. IMPRISON. MR. ROWAN HAD A PROBATION HOLD AND WAS PUT ON PROBATION MARCH 2015. MR. ROWAN WAS REARRESTED BACK IN MAY 2015 FOR THE ABOVE MENTION OFFENSE. With intent

ATTORNEY DE GRANT GIBBONS REPRESENTED MR. ROWAN ON 7-16-15 FOR THE 2nd OFFENSE FOR MANUFACTURING METH. WITH INTENT TO DISTRIBUTE AND MR. ROWAN'S PROBATION HOLD. MR. ROWAN RECEIVED THE "FAITH BASE TREATMENT PROGRAM.

PLEASE BE ADVISED THAT ATTORNEY DE GRANT GIBBONS CONTINUES TO FABRICATE THE TRUTH AND WILFULLY LIES TO ME ABOUT BEING ABLE TO OBTAIN A FAITH OR SUBSTANCE ABUSE PROGRAM FOR ME. I DEEPLY ACKNOWLEDGE THAT ATTORNEY DE GRANT GIBBONS DO NOT HAVE MY BEST INTEREST AT HAND.

ATTORNEY DE GRANT GIBBONS TOLD ME THAT MY PROBATION OFFICER TOLD HIM THAT I WAS FACING 8 YRS. FOR VIOLATION OF PROBATION. ANOTHER FABRICATED LIE BY ATTORNEY DE GRANT GIBBONS. I CALLED AND I FOUND OUT THAT I AM STILL ON PAROLE IN GEORGIA UNTIL SEPT. 16, 2015. FURTHERMORE HOW CAN I VIOLATE PROBATION WHEN I'M STILL ON PAROLE. YOU CAN NOT BE ON PAROLE AND PROBATION AT THE SAME TIME. MY PAROLE STARTED ON 9-16-14 AND ENDS ON 9-16-15.

ATTORNEY DE GRANT GIBBONS IS NOT WORKING IN MY BEHALF STATES: I CAN'T GET A TREATMENT PROGRAM WITH A HOLD ON ME. HOWEVER MR. ROWAN HAD A PROBATION HOLD ON HIM BEFORE BEING APPROVED FOR THE "POTTER HOUSE". WHICH CAN BE VERIFIED VIA COMPUTER. ALSO MR. ROWAN WAS ON CHILD SUPPORT AT THE TIME OF HIS SENTENCING. MY QUESTION IS HOW CAN MR. ROWAN WITH THE 2nd OFFENSE FOR MANUFACTURING WITH INTENT TO DISTRIBUTE. CARRYING 5 YRS-30 YRS,

VIOLATION OF PROBATION HOLD AND CHILD SUPPORT ALSO, RECEIVE A FAITH BASE TREATMENT PROGRAM, BUT ATTORNEY DE GRANT GIBBONS TELLS ME THAT I CANT OBTAIN A TREATMENT PROGRAM WITH A HOLD ON ME, ATTORNEY DE GRANT GIBBONS CONTINUES TO LIES TO ME AGAIN AND AGAIN, VIOLATION OF RULE 407-PROFESSIONAL CONDUCT.

I SPOKE WITH DE GRANT GIBBONS AT A.C.D.C. AND WAS INFORMED THAT HE WILL WORK WITH ME, SO I WENT TO COURT DD 8-4-15 AND TOLD THE JUDGE EARLY THAT I RECAINT MY MOTION FOR DIMISSAL OF COUNSEL, BECAUSE I FELT THAT ATTORNEY DE GRANT GIBBONS HAD A CHANGE OF HEART,

TO MY SUPRISE ATTORNEY DE GRANT GIBBONS DIDNT HAVE A CHANGE OF HEART, BUT INFORM ME THAT JUDGE EARLY CAN GIVE ME 30 MONTHS IF I'M READY TO PLEA, I WAS PERURB AT MYSELF FOR EVEN BELIEVING THAT ATTORNEY DE GRANT GIBBONS HAD A CHANGE OF HEART, SO I AM PETITIONING THIS HONORABLE COURT FOR A PRO BOND COUNSELOR WHEREFORE I PRAY THAT:

- (1.) THIS HONORABLE COURT WILL GRANT ME THIS MOTION FOR PRO BOND SERVICES.
- (2.) THIS HONORABLE COURT WILL RELEASE ATTORNEY DE GRANT GIBBONS FROM REPRESENTING ME.

I AM DEEPLY APPREIATIVE FOR THIS HONORABLE COURT TIME AND COOPERATION IN THIS MATTER.

"SO THAT THE ENDS OF JUSTICE SHALL BE MET."

Aiken, S.C.

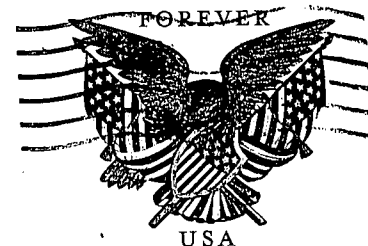
DATED: 8-5-15

RESPECTFULLY SUBMITTED.

x ~~Alvon Bennett~~ 940091

Alvon Bennett 940091

ALVON BENNETT #940091
AIKEN COUNTY DETENTION CENTER E-PD
435 WIRE RD.
AIKEN, SOUTH CAROLINA 29801



SUPREME COURT OF SOUTH CAROLINA
DANIEL E. SHEARDUSE, CLERK OF COURT
P.O. BOX 11330
COLUMBIA, SOUTH CAROLINA

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