

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Appeal from Greenville County

Letitia H. Verdin, Circuit Court Judge

RECEIVED

SEP 18 2015

S.C. Supreme Court

ANTHONY MAURICE LOUNDS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2015-000124

SUPPLEMENTAL APPENDIX

WANDA H. CARTER
Deputy Chief Appellate Defender

South Carolina Commission on Indigent
Defense
Division of Appellate Defense
PO Box 11589
Columbia, SC 29211-1589

ATTORNEY FOR PETITIONER

ALAN WILSON
Attorney General

KAREN RATIGAN
Senior Assistant Deputy Attorney General
Office of the Attorney General
P. O. Box 11549
Columbia, SC 29211

ATTORNEYS FOR RESPONDENT

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SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE



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Robert M. Dudek, Chief Appellate Defender
Wanda H. Carter, Deputy Chief Appellate Defender

December 13, 2012

Mr. Nihar Patel
The Carolina Law Group
910 East Washington Street
Greenville, S.C. 29601

Re: State v. Anthony Lounds, our file no.: 11-423

Dear Mr. Patel:

I represent Anthony Lounds in his direct appeal. You represented Mr. Lounds concerning the charges. The judge relieved you prior to trial. On Mr. Lounds' behalf, I am requesting copies of all written communications between your office and the prosecutor in his case. I appreciate your cooperation in this matter. I look forward to receiving those materials soon.

If you have any questions concerning this matter, please do not hesitate to contact me.

Sincerely,

Susan B. Hackett
Appellate Defender

SBH/

cc: Anthony Lounds





SCCID

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Wanda H. Carter, Deputy Chief Appellate Defender

December 13, 2012

Mr. George Anthony Campbell, Jr.
Thirteenth Circuit Solicitor's Office
305 East North Street, Ste. 325
Greenville, S.C. 29601

Re: State v. Anthony Lounds, our file no.: 11-423

Dear Mr. Campbell:

I represent Anthony Lounds in his direct appeal. Mr. Lounds informed me that he met with you on December 5, 2012 at the Greenville County Courthouse. He further informed me that you indicated that you communicated a written plea offer to Nihar Patel, Mr. Lounds' trial attorney. Please provide me with a copy of the written plea offer. I look forward to receiving the plea offer soon. Thank you for your cooperation.

If you have any questions concerning this matter, please do not hesitate to contact me.

Sincerely,

Susan B. Hackett
Appellate Defender

SBH/

cc: Anthony Lounds



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Robert M. Dudek, Chief Appellate Defender
Wanda H. Carter, Deputy Chief Appellate Defender

February 1, 2013

Mr. Anthony Lounds, #227456
McCormick Correctional Institution
386 Redemption Way
McCormick, SC 29899

Dear Mr. Lounds:

I spoke to Mr. George Campbell of the Greenville Solicitor's office today. He received my letter inquiring about plea offers in your case. He stated that he does not retain written copies of the plea offers, but did find in his computer system were offers were made on May 17, 2010 and January 26, 2011. He believes he made the offers to Nihar Patel.

I hope this information assists you in your endeavor.

Sincerely,
Susan B. Hackett
Susan B. Hackett
Appellate Defender

SBH/

STATE OF SOUTH CAROLINA)
)
 COUNTY OF GREENVILLE)
)
)
)
 The State)
)
 -vs-)
)
 Anthony Maurice Lounds,)
 Defendant)

IN THE COURT OF GENERAL SESSIONS
 Indictment Nos. 2010GS236028
 2010GS2310156

NOTICE OF INTENT TO SEEK LIFE
 WITHOUT PAROLE

FILED IN CLERK OF COURT
 PAUL WICKENS
 GREENVILLE, SC
 2011 MAR 24 AM 8:55

The State hereby notifies Anthony Maurice Lounds and his attorney, Scott Robinson, of its intention to seek sentencing of the Defendant under Section 17-25-45 for a sentence of life without the possibility of parole if the State obtains a conviction on the above-referenced indictments for Anthony Maurice Lounds.

The Defendant has been convicted of the following most serious offense: Voluntary Manslaughter.

George A. Campbell

 George A. Campbell
 Assistant Solicitor

Greenville, South Carolina
 March 23, 2011

Car

EXHIBIT
 2
 10/2/14 TBJ

WITNESSES

Alvin King

Greenville County Sheriff's Office

10/11/2009

ARREST WARRANT NUMBER
1343242 and 1343243

ACTION OF GRAND JURY
TRUE BILL
Wm. A. Roberts

FOREMAN GRAND JURY

Forperson of Grand Jury

VERDICT
Court I: Guilty

Court II: Guilty
Alvin King
Date: *7/13/11*
Forperson of Petit Jury

DOCKET NO. 2009-GS-23-

GAC

✓ The State of South Carolina

County of Greenville

010155

COURT OF GENERAL SESSIONS

November TERM 2009 / 2

THE STATE

VS.

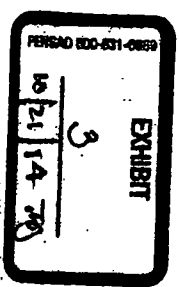
ANTHONY MAURICE LOUNDS

Indictment for

0139 and 0549

ARMED ROBBERY and POSSESSION OF A
WEAPON DURING THE COMMISSION OF A
VIOLENT CRIME

VIOLATION § 16-11-0330 and 16-23-0490



STATE OF SOUTH CAROLINA)
)
COUNTY OF GREENVILLE)

INDICTMENT FOR
ARMED ROBBERY and POSSESSION OF A WEAPON DURING
THE COMMISSION OF A VIOLENT CRIME

At a Court of General Sessions, convened on **NOV 23 2010** the Grand Jurors of Greenville
County present upon their oath:

COUNT I – ARMED ROBBERY

That ANTHONY MAURICE LOUNDS did in Greenville County, on or about the 5th day of September, 2009, while armed with a deadly weapon, or while alleging either by action or words he was armed while using a representation of a deadly weapon or any object which a person present during the commission of the robbery would reasonably believe to be a deadly weapon, take by means of force or intimidation, goods or monies described as: U.S. currency and a checkbook from the person or presence of BRIAN WORKMAN. This is in violation of §16-11-330 of the South Carolina Code of Laws (1976) as amended.

COUNT II – POSSESSION OF A WEAPON DURING THE COMMISSION OF A VIOLENT CRIME

That ANTHONY MAURICE LOUNDS did in Greenville County, on or about the 5th day of September, 2009, possess or visibly display a hand gun during the commission or attempted commission of a violent crime, to wit: ARMED ROBBERY. This is in violation of §16-23-490 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.

Geo. Campbell
SOLICITOR