

STATE OF SOUTH CAROLINA IN THE COURT OF APPEALS

APPEAL FROM WILLIAMSBURG COUNTY - GEORGE C. JAMES JR. CIRCUIT COURT JUDGE

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THE STATE

DEC 02 2015

RESPONDENT

SC Court of Appeals

vs.

SHAHID NAJID AKA
ARTHUR Moseley

Appellant

RETURN TO COUNSEL AND RESPONDENTS RETURN TO APPELLANTS
MOTION FOR SUBSTITUTION OF ATTORNEY(S) SCACR Rule 264(c)

I ADA-APPELLANT, SHAHID NAJID AKA ARTHUR Moseley, MOVES HONORABLE COURT OF APPEALS TO ACKNOWLEDGE THE BLATANT-[MALICIOUS]-[CONSPIRACY]- BETWEEN SCAD COUNSEL [MS. Lanelle-CANTY DURANT ESQ.]; [Chief Appellate Defender MR. ROBERT DUDER]; AND [RESPONDENTS MR. WILLIAM-EDGAR SALTER III ESQ.] TO VIOL [MS. Lanelle DURANT ESQ.] APPELLANTS COUNSEL TO KEEP APPELLANT (ADA) KIDNAPPED ON ILLEGAL DETAINMENT IN SCDC.

BLACKSTONE LAW GLOSSARY: KIDNAPPING = [A FORM OF FALSE IMPRISONMENT, AGGRAVATED BY REMOVAL OF THE PERSON TO SOME OTHER PLACE & HOLDING FOR SOME UNLAWFUL PURPOSE]; IMPARTIAL = [DISINTERESTED; UNBIAS; EQUITABLE]; FABRICATE = [TO DEVISE FALSELY; TO FAISIFY; TO COUNTERFEIT]; ILLICIT = [UNLAWFUL; UNAUTHORIZED; NOT PERMITTED]; CORRUPTION = [SOMETHING AGAINST OR FORBIDDEN BY LAW, ANY SPECIAL INFLUENCE, OR DEVIATION IN THE ADMINISTRATION OF A PUBLIC OFFICE]; CONSPIRACY = [AN AGREEMENT OR COMBINATION OF TWO OR MORE PERSONS TO DO AN UNLAWFUL ACT]; FELONIOUS = [MALICIOUS; DONE WITH INTENT TO COMMIT A CRIME].

THE BELOW ADDRESSES COUNSEL AND RESPONDENTS [ILLICIT] [FELONIOUS] [CONSPIRACY]!

I. MOTIONS

A. APPELLATE COUNSEL FAILED TO FILE A MOTION OF DISMISSAL BECAUSE RESPONDENTS DID NOT FILE HIS INITIAL BRIEF OF RESPONDENT WITHIN 30 DAYS.

D ADA APPELLANT HAS YET TO RECEIVE A LETTER FROM COUNSEL [MS. DURANT ESQ.] AS TO REASON FOR NOT DOING MOTION! = Rule 1.2; Rule 1.4; Rule 8.4(d); Rule 8.4(e); 6TH AMEND. EFFECTIVE ASSISTANCE OF COUNSEL; 5TH AMEND. ACCESS TO COURTS; 14TH AMEND. DUE PROCESS AND EQUAL PROTECTION; 14TH AMEND. VIOLATIONS.

II.

a) RESPONDENTS CITE "COURT GRANTED FINAL EXTENSION ETC." QUESTIONS: (A) [WHERE IS ADA APPELLANT COPY!?]
(B) WHY HASNT ADA APPELLANT BEEN SEALED DOCUMENTATION VIA COURSE OF EXTENSION!?!]

ANSWERS: [IT'S A FELONIOUS, ILLEGAL CONSPIRACY TO KEEP MENTAL HEALTH APPELLANT KIDNAPPED ON CAIRNE IN WHICH ADA APPELLANT IS INNOCENT OF!]

B. Appellate Counsel Failed to File a Reply Brief.

1) APPELLANT HAS YET TO RECEIVE A LETTER FROM COUNSEL MS. Lanelle C. DURANT ESQ. (AS TO REASON FOR NOT ADMINISTERING A "REPLY BRIEF". SUPRA VIOLATIONS

a) NO DIRECT COMMENT BY RESPONDENTS ON THAT ISSUE! QUESTIONS: (A) WHY WOULD RESPONDENTS CITE "IT IS BEEN THE EXPERIENCE OF THE UNDERSIGNED THAT [MS. DURANT ESQ.] HAS ALWAYS DILIGENTLY AND EFFECTIVELY REPRESENTED HER CLIENTS"!?! (B) WHY IS IT IN RESPONDENTS BEST INTEREST THAT MS. DURANT REMAIN APPELLANT'S COUNSEL!?! - ANSWERS: [IT'S A FELONIOUS, ILLEGAL CONSPIRACY TO KEEP MENTAL HEALTH APPELLANT KIDNAPPED ON CAIRNE IN WHICH ADA APPELLANT IS INNOCENT OF!]

C. Appellate Counsel Refuse to do "WAIT MOTION COMPELLING THE WILLIAMSBURG CO. CLERK TO FORWARD FUNDS PAID TO HER FOR THE COURT REPORTER FOR THE [JAN. 29, 2013 - BOND REVOCATION HEARING] TRANSCRIPT." THIS HEARING WOULD "VALIDATE THAT THE BENCH WARRANTS WERE NOT VALID" ACCORDING TO APPELLANT MODEL.

1) Counsel CITES "DOCUMENTS THAT WERE NOT PART OF RECORD," CITING Rule 207, SCAR, ADA APPELLANT REBUTS WITH CONCLUSIVE FACTS: A) APPENDIX IV. 4TH CIRCUIT GUIDELINES FOR PREPARATION OF APPELLATE TRANSCRIPTS 8.(a) [SPECIAL CIRCUMSTANCES] (A) both APPELLANTS (B), JAN. 21, 2014, TRANSCRIPT [JUDGE CLIFTON NEWMAN] (pgs. 22 LINES 8-10; 12-14) ADA APPELLANT INFORMED JUDGE NEWMAN HE DID HEARINGS AND DID NOT HIT BENCH WARRANT BECAUSE HE DID NOT THINK ADA APPELLANT WAS COMPETENT FOR SOCIETY pgs. [19 L. 5-19] APPELLANT VALIDATE BENCH WARRANT OF [DEC. 29, 2012] IS NOT OF MERIT DUE TO (A) NO SIGNATURE OF A JUDGE TO AUTHORIZED WARRANT: (B) EMERGENCY HOSPITALIZATION AND HOSPITAL [DENNIS - PEE DEE MENTAL HEALTH; NIM DISCHARGE NURSE] DID NOTIFY COURT EXH. MEDIC, SEE ALSO [EXH. Med. A, B, D]. THIS VALIDATED TRANSCRIPT IS ON THE RECORD ALSO.

QUESTIONS: (A) WHY KNOWING ABOVE WONT COUNSEL [MS. DURANT ESQ.] ADMINISTER WAIT!?!

(B) WHY IS RESPONDENT SWINGING COUNSEL YET ANOTHER ACCORDS ON ANOTHER ISSUE!?! [APPELLATE

COUNSEL IS CORRECT IN HER ASSESSMENT THAT HE "APPEARS TO MISAPPREHEND THE APPELLATE PROCESS," ETC.]

III.

Ans: IT'S A FELONIOUS, ILICIT CONSPIRACY TO KEEP MENTALLY ILL APPELLANT KIDNAPPED ON CRIME IN WHICH ADA-APPELLANT IS INNOCENT OF! SUPRA VIOLATIONS

D. Appellate Counsel Failed to file a MOTION FOR AN APPEAL BOND.

1) ADA-APPELLANT ESTABLISHED IN MOTION FOR SUBST. of COUNSEL VIA [EXH. F.] COUNSEL DISCOURAGEMENT AND APPELLANT'S REPLY [EXH. F.2]! RESPONDENTS DOES NOT DIRECTLY COMMENT ON THIS ISSUE.

QUEST.: ① WHY RESPONDENTS DIDNT COMMENT ON BAIL BOND!?!; ② WHY WONT COUNSEL DO BOND MOTION!?! [EXH. MED. C.] VALIDATES EMERGENCY HOSPITIZATION AND DENNIS of PEEDEE MENTAL HEALTH AND KIM DISCHARGE NOISE of CAROLINA HOSPITAL DID FAX COURT OF HOSPITIZATION. YET ADA APPELLANT STILL KIDNAPPED A YEAR ON FRIVOLOUS BENCH WARRANT of [NOV. 29-2013] THAT HAS NO JUDGE SIGNATURE AND SENTENCED TO A TOTAL of 80 YRS. ADA APPELLANT DOES QUALIFY FOR BOND PENDING APPEAL VIA [§ 314(A)] PENDING SENTENCE OR APPEAL; § 314.2 (A); § 314.3 (A)(B) APPLICABLE TO ENACTMENT of BAIL REFORM ACT [US V. Ballone (1985, CA 11 FLORIDA) 762 F.2d 1381] SEE ALSO IN Remichael H.C.S.C 2001 360 S.C.54, 1002 S.E.2d 727] ③ APPELLANT CASE WILL BE OVERTURNED DUE TO FACT DENIED COUNSEL AND FORCED TO REPRESENT SELF IN MURDER TRIAL AND AT TIME LEGALLY DISABLED RECEIVING S.S.I BENEFITS FOR MENTAL ILLNESS WITH STANDBY COUNSEL APPELLANT DID GRIEVANCE ON! ④ CASE WILL BE OVERTURNED DUE TO VIOLATION of [SPEEDY TRIAL ACT § 3161-3174]. ADA APPELLANT WAS ON BOND 7 YRS. AND STATE NED MADE IT SEEM ADA APPELLANT WAS ON RUN SINCE '08. - [COUNSEL? RESPONDENTS ARE IN A FELONIOUS ILICIT CONSPIRACY TO KEEP MENTALLY ILL APPELLANT KIDNAPPED ON CRIME ADA APPELLANT'S INNOCENT OF.] - SUPRA VIOLATIONS

II. DISCOVERY

A. EXHIBIT 3/ APPELLANT Moxley COMPLAINS THAT THESE BENCH WARRANTS ARE INCOMPLETE.

1) COUNSEL CLAIMS "HE REQUESTS DOCUMENTS THAT WERE NOT PART OF THE RECORD BELOW."

HOWEVER, BENCH WARRANTS ARE EXH. B/ AND WHAT JUDGE GEORGE C. JAMES JR. BIASLY USED TO DENY PRETRIAL MOTION TO DISMISS CITING 4 WING FACTORS YET BENCH WARRANTS WERE NOT PRESENTED UNTIL SENTENCING. SUPRA VIOLATIONS

IV.

B. Appellate Counsel Failed to obtain missing discovery documents [Ends of Justice Continuances via § 86(1)(b)(8)(A)] ; [Demetri Mack] deny; results of [LONNIE DOZIER'S] POLYGRAPH, All ABOVE DOCUMENTATION IS IN RECORD ; PART OF ADA APPELLANT'S FILES ; TESTIMONY OBJECTED TO AT TRIAL ETC.

SEE [R. 10, The RECORD ON APPEAL (A)(2)] AND COUNSEL HAS YET TO INFORM ADA-APPELLANT WHY NO DOCUMENTS RECEIVED ABOVE FROM HER OR WHY ONLY DOCUMENT OF DISCOVERY IS FROM ADA APPELLANT'S FILE AND WHY SHE'S NOT REQUESTED ANYTHING FROM STATE, [SUPRA VIOLATIONS]

C. Appellate counsel DID NOT CONTACT PRIVATE INVESTIGATOR JOHN DAVIS TO OBTAIN ADDRESS OF "WITNESS WAKONDA COOPER" WHO DID NOT TESTIFY.

However, [Wakonda Cooper] is ON RECORD IN CAMERA VIA TESTIMONY OF F.B.I. VINCENT FLAMINI, pgs. 448 (A) pgs. 465 l. 23-25, MAY 8-2002, 4TH PARAGRAPH ON Wakonda Cooper ;

B) pgs. 466 l. 14-18 [Wakonda Cooper] ATTEST \$500 PAID TO RAB; l. 19-21 [June 19, 2002] ATTEST Wakonda Cooper TOOK Lie Detector Test; C) pgs. 467 l. 1-9 ATTEST [Wakonda Cooper] PASSED Lie Detector Test. NOTE: STATES CASE IS BASED ON LONNIE DOZIER, QUES: WHY WOULD COUNSEL

[MS. DUARANTE SQ.] NOT REQUEST DOCUMENT FOR ADA APPELLANT'S DEFENSE IN WHICH IS PART OF ORIGINAL DISCOVERY! ? [CONSPIRACY] § 87(2)(b) PLEAS OR DETENTION OF A MATERIAL WITNESS, P.I. MR. DAVIS/ COULD REACHED WAKONDA COOPER AND OBTAIN DEPOSITION FOR APPELLANT ETC. SUPRA VIOLATIONS.

COUNSEL CITES [CHIEF APPELLATE DEF. ROBERT DUDER] "STRANGELY OPPOSES" NEW COUNSEL ETC.

QUESTION: WHY HASNT ADA APPELLATE RECEIVED (1) ONE LETTER BACK ON COMPLAINTS ON COUNSEL [MS. DUARANTE SQ.] ADDRESSED TO HIM, HER SUPERVISOR! ? [CONSPIRACY] !!!

THE RESPONDENT'S CITE "DOES NOT TAKE ANY POSITION AS TO WHETHER OR NOT APPELLANT'S MOTION SHOULD BE GRANTED OR DENIED." QUESTIONS: (1) WHY DID RESPONDENT EVEN DO A MOTION ON ISSUE WAITING TAXPAYERS MONEY! ? (2) WHY COMPLIMENT OR GIVE RECORDS TO COUNSEL [MS. DUARANTE] (5) FIVE TIMES THEN IN DOCUMENT! ? [CONSPIRACY] !!!

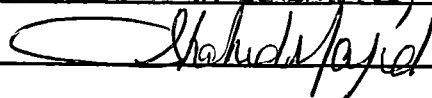
RESPONDENTS COMMENTED ON [PRO. BOND DEBRA BUTCHER] BEING REPORTED TO OFFICE OF DISCIPLINARY COUNSEL, YET FAILED TO CITE WHY. [EXH. D.B], AFFIDAVIT OF SERVICE -

V.

IF [Kim Shafer] EMPLOYED BY [Debra Botches] BEING REASON. ITS CHECKED, STAMPED
1 AUG. 1-2013 BY BRADY MOTION AND 'REQUEST FOR JURY TRIAL', WITHOUT ADA APPELLANT
CONSENT. THAT'S A, FABRICATED, FRAUD OF COURT DOCUMENT, IN WHICH WARRANTS SUSPENSION,
SEE CASES [IN RE WITE 378 S.C. 333(2008)]; AS WELL AS CASE [IN RE BOLDING 356 S.C. 319,
589 S.E.2d 197(2003)] BOTH RECEIVING SEVERAL MONTHS SUSPENSION FOR CONDUCT THAT
UNPROFESSIONAL.

WHEREFORE, APPELLANT MOVES HONORABLE SUPREME COURT OF APPEALS TO APPOINT
MENTAL HEALTH APPELLANT [NEW INDEPENDENT AND IMPARTIAL COUNSEL] THAT'S NOT A SEC 19
VIA [§17-4-80] IN WHICH IS WRITTEN LAW. IT IS CLEARLY ESTABLISHED VIA CONCLUSIVE, JUDICIAL
EVIDENCE, THE 'CORRUPTION' - CONSPIRED - BY COUNSEL MS. DUARTE SQ.; CHIEF APPEL. MR. DUCK;
AND, RESPONDENTS MR. WILLIAM EDGAR SALTER III [S.C. BAR NO 4816] TO CONTINUE TO, UNETHICALLY
ADMINISTER A - FELONY, WHICHT, CONSPIRACY, TO KEEP MENTAL HEALTH APPELLANT, SAHAB MAJID -
AKA ARTHUR MISSEY, KIDNAPPED, ON INLEGAL SENTENCE FOR CRIME HE'S INNOCENT OF; IN WHICH
IS A TRAVESTY OF JUSTICE IN 2015. ANY FURTHER DETERIORATION OF HEALTH OF MENTAL HEALTH
APPELLANT POST, HONORABLE JUDGE J. MICHAEL BAYLEY'S DECISION AGAINST SUDO PRACONARY
CONDUCT, AGAINST, MENTAL HEALTH PRISONER, C/N: 2005-CP-2925 [JAN. 8-2011] DUE TO
CONSPIRACY, ETC. ABOVE IS AN ADMISSION OF LIABILITY! IT SO RESPECTFULLY MOVE!

RESPECTFULLY SUBMITTED,



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CERTIFICATE OF SERVICE

I, SHAHID MAJID AKA ARTHUR MOSELEY, ADA APPELLANT DO ATTEST THAT ON BELOW DATE I DID SERVE [CLERK OF COURT HONORABLE JENNY ABBOT WITCHINGS P.O. BOX 1629 S.C. COURT OF APPEALS - COLUMBIA, S.C. 29211] A COPY OF: [APPELLANT'S RETURN TO COUNSEL AND RESPONDENT'S RETURN TO APPELLANT'S MOTION FOR SUBSTITUTION OF ATTORNEY'S SCAPR RULE 264 (C)] AND ASK HONORABLE CLERK TO SERVE A COPY TO RESPONDENTS AND COUNSEL, AND RETURN A CHECKED, STAMPED COPY TO I, ADA APPELLANT AT BELOW ADDRESS.

ON THIS, 27th DAY OF, NOV., 2015

Shahid Majid

SHAHID MAJID AKA ARTHUR MOSELEY #199138

h.c.t. - P.O. Box 205 - A# 201-RMN

Ridgewille, SC 29472

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THE SOUTH CAROLINA COURT OF APPEALS

HONORABLE CLERK JENNY ABBOTT KITCHINGS

P.O. BOX 11629 - CLERKS OFFICE

COLUMBIA, S.C. 29211

NOV. 26th 2015

RE: STATE VS. MOSELEY AKA MAJUD C/N: 2014-00019

DEAR CLERK KITCHINGS:

MAY THE LORD GOD OF ABRAHAM BLESS YOU, FAMILY AND STAFF.

PLEASE FIND ENCLOSED "APPELLANT'S RETURN TO COUNSEL AND RESPONDENT'S RETURN TO APPELLANT'S MOTION FOR SUBSTITUTION OF ATTORNEY'S SEARCH RULE 26N(C).I". PLEASE RETURN A STAMPED COPY OF DOCUMENT AND EXHIBIT TO ME AT BELOW ADDRESS. ALSO, PLEASE ALSO SEND COPIES TO COUNSEL AND RESPONDENTS! MAY GOD BLESS.

RESPECTFULLY SUBMITTED.

Shahid Majid

SHAHID MAJUD #199299- ADA

L.C.I. P.O. BOX 205-A #201-RNW

Ridgelyville, SC 29172

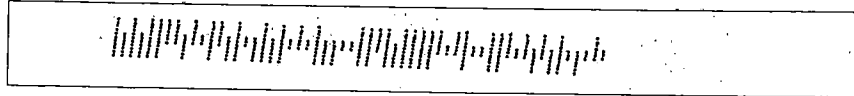
STANIMATIO AKA ARTHUR Moseley #1991398-ADA
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Bluffville, SC 29142

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