

CCF

R. Pugh

The State of South Carolina

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Respondent,

FEB 24 2016

v.

Coyhamar Knight Jr. #162287

SC Court of Appeals

Appellant

Appellate Case No. 2015-002183

PRO-SE BRIEF FOR DEFENDENT

\* Note:

This Brief contains Arguments that the Defendant would like to present to help the Courts decide on Acceptance of My Appeal Being Processed.

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# Arguments:

- 1) Did not have sufficient time to discuss case with My Attorney (Brandon Steen).
- 2) Prior to Brandon Steen being appointed to represent me My lawyer Bill Nowicki had arranged a plea agreement to 1 year probation and a judgement for \$80,000.00 until time of sentencing.
- 3) We had also discussed a change of venue because of their being so much T.V., Newspaper and social media coverage.
- 4) Brandon Steen admitted he had not had time to present a defense on my behalf due to him being passed down the case two days prior to trial. He only had a chance to talk to me once for 15 minutes on the Monday prior to my trial starting on Tuesday.

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- 5) Brandon Steen also informed me on that Monday that they could not get a judge into court because of severe flooding in the county and roads being closed and for me to return home to Myrtle Beach until he could set another date for a trial. He didn't contact me, I tried to contact him all that day and could not catch him in his office. This led to my trial in my absence and him proceeding with out preparation of a case on my behalf.
- 6) Did not address truthfully the reason for my absence. He had told me on Monday that if I didn't talk him on that day to be back in court on the following month.
- 7) Mr. Steen did not cross examine any of the witnesses to establish if video evidence followed chain of command.

- 8.) I did not speak with CAPT. BAILEY UNTIL they came to execute the search WARRANT. Detective McINVILLE stated that I had spoke with them prior to the Issuing of the search WARRANT. Not TRUE.
- 9.) On the Video Detective McINVILLE stated he could not Identify the Clothing or the Person or RACE of the Person in the Video.
- 10.) Video came from A Infrared CAMERA therefore you Cant disquish the Color of Clothing.
- 11.) The Clothing Including the to baggan belonged to my Son-In-law's Uncle Franky Ellis.
- 12.) Detective Jennifer Rumbaugh Did not Investigate but WAS Allowed to obtain the search WARRANT for other Detectives Investigation.
- 13.) Detective Jason Catoe said he obtained search WARRANT so SLED could Assist in search.
- 14.) Detective Catoe said they Couldn't PROVE where they started.
- 15.) They seized Items not listed in search WARRANT (DOG LEASH). (DARK BLACK and light BLUE PANTS) (2 different COATS)
- 16.) The Dog in Question is SAID to HAVE white legs and PAWS also white on his Neck down through It's Chest. "My Dog is Black with 3 white spots on her Paws." Also Video shows A dog with A straight Tail hanging Down. My Dogs tail Curls upward.

17) Agent KELLER that he APPROACHED ME to CONDUCT A field INTERVIEW. That not true, I called him to My NEIGHBORS house so that they could SHARE information ABOUT seeing A TALL Black MALE with A dog LEADING the SEEN of Another FIRE they where INVESTIGATING.

18.) My ATTORNEY had NO IDEA that Agent KELLER would testify. This is A VIOLATION due to NO JACKSON V. DENNO hearing to establish if STATEMENT could be ALLOWED to be heard by the JURY.

19.) Agent KELLER STATED that his CONVERSATION was only A GENERAL CONVERSATION but yet he REQUESTED My NAME DATE of BIRTH AND ADDRESS.

20.) They CAN NOT IDENTIFY ANY of the clothing truthfully to be the clothing WORE by the PERSON in the VIDEO either by EYE OR TESTING FOR EXCELLERENT.

21.) MARK JOHNSON did testify he couldn't distinguish if it WAS ME OR My SON.

22.) The COURT state that you CAN NOT EVEN AFFIRMATIVELY IDENTIFY the RACE of the PERSON in the VIDEO. NOT EVEN the clothing.

23.) Tried AND Sentenced in DEFENDENTS Abscense because Counsel failed to CLARIFY when trial would begin.

24) MARK JOHNSON Testified that he could I. D. ME by My WALK. some type of SWAGGER. But he originally said it was My son MATTHEW.

- 25.) They Claim they could I.D. the CAMO JACKET ON A Infa Red CAMERA. It only shows Black and white not CAMO
- 26.) They Also took A LARGE BROWN COAT that was my Daughter JACKET AS WELL AS her CAMO JACKET.
- 27.) They said I had shoes that matched the white shoes with white soles on, yet they took A pair of Black shoes that were found under A bed along with some other old shoes that were there when I moved in.
- 28.) THERE IS NOT ANY Definites in the CASE. For something to be proved beyond A REASONABLE doubt there has to be some Definites in that. They could not distinguish if it WAS ME OR My son, They could not tell what was worn by the PERSON who started the fire. They didn't know if it was Light or DARK PANTS. They couldn't decide if it was A GREEN BAY TOBAGGAN OR A BLACK TOBAGGAN. They couldn't tell if it WAS A JACKET OR A COAT. (BROWN OR CAMO)
- 29.) MR JOHNSON STATED he fired my wife AND DAUGHTER for stealing when he REALLY fired them because while living with MR. JOHNSON My DAUGHTER WAS AWAKEN one Night by MR. JOHNSON try to put his PENIS in her Mouth. So he fired them AND WE MOVED BECAUSE of his SEXUAL MOLESTATION of My DAUGHTER. Not For stealing.
- 30.) MR STEEN Lied About what he had told me AS FAR AS when to Return to Court.

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SC Court of Appeals

Dear Sir,

PLEASE find enclosed my Arguments that I found in my trial. PLEASE ASSIST ME in this PRO SE Motion to the Courts.

Sincerely  
C. H. Hight

TO: ROBERT M. PACHAR  
Appellate Defender

Coy Knight #162287  
R.C.I. / SA-10  
Ridgeland S.C. 29936

CHARLESTON SC 294

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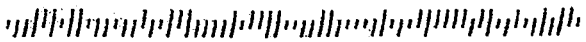
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Robert M. Dudek, Chief Appellate Defender  
Wanda H. Carter, Deputy Chief Appellate Defender

February 22, 2016

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The Honorable Jenny Kitchings  
Clerk, S.C. Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: The State v. Coy Lamar Knight, Jr.  
Appellant Case No. 2015-002183

Dear Ms. Kitchings:

Please accept this pro-se brief of appellant. I am forwarding this to the court because I submitted an Anders brief on appellant's behalf.

Sincerely,

Robert M. Pachak  
Appellate Defender

RMP/ccf

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