

FILED

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF WILLIAMSBURG) THIRD JUDICIAL CIRCUIT

2016 FEB 24 AM 11:40

Robert Troy Taylor, #315084, SHARON W. S. GOODE 2015-CP-45-037
Applicant CLERK OF COURT

v.

KINGSTREE, S.C.

State of South Carolina,)
Respondent.)

ORDER GRANTING APPLICATION
FOR POST-CONVICTION RELIEF

2016 FEB 24 PM 3:54
JEREMY A. THOMPSON
CLERK OF COURT
KINGSTREE, S.C.

This matter comes before the Court pursuant to Robert Troy Taylor's Application for Post-Conviction Relief filed on December 31, 2014, and amended on October 14, 2015. The State filed its Return on June 8, 2015.

Taylor is presently confined in the South Carolina Department of Corrections and is serving a life sentence without the possibility of parole for kidnaping and second degree criminal sexual conduct with a minor. The Honorable George C. James, Jr. presided over Taylor's jury trial, which began on July 10, 2007. Charles David Barr represented Taylor at trial.

Taylor appealed from his conviction, and Jeremy A. Thompson represented Taylor on appeal. On June 6, 2012, the South Carolina Court of Appeals affirmed Taylor's convictions and sentence. *State v. Taylor*, 399 S.C. 51, 731 S.E.2d 596 (Ct. App. 2012). Taylor then sought certiorari to the South Carolina Supreme Court, but his petition was denied. His case was remitted on April 7, 2014.

Since that time, Taylor filed this post-conviction relief action, and an evidentiary hearing was held on November 19, 2015, at the Sumter County Courthouse. Taylor was present and represented by Tricia A. Blanchette. Assistant Attorney General Daniel Gourley represented the State.

After carefully considering the testimony and exhibits presented during the evidentiary hearing, the records of the Williamsburg County Clerk of Court, the trial transcript, the appellate court filings, and the Appendix from Taylor's Georgetown County conviction, Taylor's application for post-conviction relief is granted for the reasons that follow.

FACTUAL BACKGROUND

The Court of Appeals provided this succinct explanation of the allegations against Taylor:

Taylor was the pastor of the church Victim attended in Murrells Inlet, South Carolina. In November 1998, when Victim was 11, Taylor organized a camping trip with Victim and a group of six or seven boys from the church. Taylor took the boys to an area "just outside [the city of] Andrews" on Highway 521 and the group hiked about a mile into the woods to a campsite "right next to the Black River." Taylor and the boys set up a tent and a large tarp, made a fire, and cooked food. At approximately 11 p.m., the boys retired to their sleeping bags under the tarp. Later that night, Taylor woke Victim, placed his hand over Victim's mouth, and carried him to the tent. Once inside the tent, Taylor removed Victim's clothes and forced Victim to touch his penis and anus. Taylor also touched Victim's penis and anus. Next, Taylor raped Victim. After raping Victim, Taylor instructed Victim not to reveal the rape to anyone and returned Victim to his sleeping bag. Taylor slept next to Victim and held him throughout the course of the night.

State v. Taylor, 399 S.C. 51, 55, 731 S.E.2d 596, 598-99 (Ct. App. 2012).

This allegation will hereinafter be referred to as the "Williamsburg County incident," and it is the crime for which Taylor is serving a life without parole sentence and from which he seeks post-conviction relief.

As with many cases involving allegations of child sexual abuse, Victim did not disclose the Williamsburg County incident until many years later, when he was seventeen years old. On June 1, 2005, Victim provided the following written statement to the Georgetown County Sheriff's Office:

Sometime between February and April LC3 Youth Groups went on a camping trip to Andrews, S.C. It was very cold outside and it rained a little bit. My friend Charles Harrison asked me if I wanted to go. We went back in the woods about a mile and a half. There were corn fields all around with two houses on either side of the street. We set up camp around like 7:30 PM. We made a bon fire and then went to bed around 11:00. About 2 to 3 hours later Troy woke me up by putting his hand over my mouth and telling me to be qui[et]. He took me to a sep[a]rate tent and started touching my penis. He was honestly rubbing and fondling it. He did this for like 30 minutes continuously touching me. I told him to stop numerous times he just told me to be qui[et]. After that he took me back to the other tent and made me sleep beside him. I g[ue]ss so I wouldn't say nothing. I'm not really sure if anyone saw anything but if they did Zack Webster or Charles Harrison would be the ones that saw.

Six months after disclosing the abuse from the 1998 Williamsburg County incident, Victim disclosed another incident of abuse at the hands of Taylor. This incident occurred in 1999 in Georgetown County. The Court of Appeals described it as follows:

In August 1999, Taylor and a few other adults from the church organized a trip to the beach. After leaving the beach, the group returned to the church to use the showers. Once all the showers were occupied, Taylor asked Victim and another boy if they would like to use the showers at his house. Victim and the other boy accompanied Taylor to his home near the church. While Victim was showering, Taylor entered the bathroom, removed his clothes, and entered the shower. Taylor forced Victim to touch his penis and Taylor touched Victim's penis and anus. Next, Taylor raped Victim. After raping Victim, Taylor instructed Victim not to divulge the rape to anyone. Taylor drove Victim and the other boy back to the church.

State v. Taylor, 399 S.C. at 55-56, 731 S.E.2d at 599.

Taylor pleaded guilty in Georgetown County to this 1999 incident on April 20, 2006.¹ The Honorable Edward B. Cottingham sentenced Taylor to eight years', suspended to five years of active time and three years' probation.

In March of 2007, approximately four months before Taylor was tried for the 1998 Williamsburg County incident, the State served Taylor with a notice of intent to seek a sentence of life without the possibility of parole pursuant to section 17-25-45 of the South Carolina Code. The State relied on Taylor's 2006 Georgetown County conviction for second degree criminal sexual conduct to enhance Taylor's punishment.

At Taylor's trial, the State moved to strike the first jury that was selected, arguing that defense counsel had used eight out of ten strikes against white jurors. The trial judge found that defense counsel violated *Batson v. Kentucky*, when he struck juror number 146. Mr. Barr purportedly struck her because she was too educated, yet he sat a black, female juror with more education than juror number 146. A new jury was then selected, and juror number 146 was seated on the jury that convicted Taylor.

At trial, the State called four witnesses: (1) Gayle Allen Cooke of the Durant Children's Center, who was qualified as an expert in the field of counseling and treatment of childhood sexual abuse; (2) Victim's mother; (3) Victim; and (4) Sergeant Laura Rogers of the Williamsburg County Sheriff's Office. Ms. Cooke testified generally that a person who has been abused as a child may be withdrawn and have suicidal tendencies. She further explained that it was "pretty normal" for abused children to turn to alcohol or drugs and that it was very common for them to have difficulties with the law. She also testified that 69% of child victims wait to

¹ Taylor also pleaded guilty to two counts of lewd act on a minor, which appear to stem from this same incident although the record is not entirely clear.

disclose abuse until adulthood. On cross-examination, she admitted that she had never met Victim and did not know if he was sexually abused.

Victim's mother testified that her son attended the church camping trip in November 1998, when he was 11. She further testified that at the age of 14, Victim began abusing drugs and alcohol, and at some point prior to disclosing the abuse, he attempted to kill himself with an overdose of Xanax. On cross-examination, defense counsel asked Victim's mother a series of questions about the location of the camping trip, apparently attempting to demonstrate that she did not have firsthand knowledge that the campsite was located in Williamsburg County. (p. 90-92) Counsel also elicited testimony from her that Victim's behavior was not noticeably different between the ages of eleven and fourteen, when Victim began abusing drugs and alcohol. Victim's mother also admitted that she and her husband (Victim's father) were experiencing a "little bit" of marital difficulty when she "started noticing [Victim's] somewhat unwholesome behavior."

Victim, who was 19 years old at the time of the trial, also testified, describing both the 1998 Williamsburg County incident and the 1999 Georgetown County incident. Victim testified that after being abused, he was too scared to tell anyone. At 14, Victim admitted he began smoking marijuana, and a year later, he began drinking alcohol. He testified that he did this in an effort to drown out memories of the abuse, and by the age of sixteen he graduated to more serious drugs, such as cocaine and pills. At the age of 17, he took nine Xanax pills because he wanted to hurt himself. After that, Victim testified he told a male friend about being abused by Taylor as a child. Victim then disclosed the 1998 Williamsburg County incident to law enforcement, and six months later, he disclosed the 1999 Georgetown County incident. Victim specifically identified the location of the campsite as being in Williamsburg County. On cross-

examination, defense counsel pointed out discrepancies between Victim's initial statement and his testimony in court. For instance, defense counsel pointed out that Victim first identified the trip happening sometime between February and April, yet testified it happened in November only after finding a church bulletin listing the actual date of the youth camping trip. Defense counsel also questioned Victim about whether the other boys saw Taylor waking up next to Victim, and Victim acknowledged that they did but none of them said anything. Victim also testified that Taylor did not bring his son on the camping trip.

The State's final witness was Sergeant Laura Rogers, a victim's advocate for the Williamsburg County Sheriff's Office. She testified that the incident occurred in Williamsburg County, and at the time of the incident, Victim was 11 years old and Taylor was 39 years old. On cross examination, defense counsel focused on the location of the incident, pointing out that the Black Ricker runs through both Georgetown and Williamsburg counties.

The defense called one witness, Trevor Morton. Mr. Morton is Taylor's nephew and participated in the camping trip. According to Mr. Morton, he slept next to Taylor under the tarp, and Taylor had his three- or four-year-old son with him, sleeping in the same sleeping bag. Mr. Morton testified that he knew Taylor remained next to him all night because Mr. Morton did not sleep well due to being cold and feeling scared from the ghost stories told earlier in the evening. Mr. Morton confirmed that another tent was set up, but testified that the tent had everyone's gear stored in it. Mr. Morton did not remember Taylor sleeping next to Victim, nor did he remember anything unusual happening that night. On cross-examination, the State pointed out that Mr. Morton loved his uncle and did not want anything bad to happen to him. After Mr. Morton's testimony, the defense rested.

Defense counsel successfully requested that the trial judge charge the jury on the issue of venue, so that issue would be part of the jury's deliberation. As a result, counsel spent a fair amount time arguing venue in his closing statement, though he also questioned the victim's credibility in an effort to create a reasonable doubt. Ultimately, the jury convicted Taylor, and the judge sentenced him to life without the possibility of parole.

Taylor appealed his convictions and essentially argued the trial court erred in four respects: (1) granting the State's *Batson* motion, (2) allowing Victim to testify about the 1999 Georgetown County incident, (3) denying Taylor's motion for directed verdict because venue had not been established, and (4) sentencing Taylor to life without parole when the substantive facts of the predicate offense were admitted at trial as common scheme or plan evidence. The South Carolina Court of Appeals affirmed Taylor's convictions, and the Supreme Court denied certiorari.

Taylor filed this post-conviction relief action and raised the following allegations:

1. Trial counsel failed to prepare and investigate prior to trial, which resulted in a failure to present a reasonable defense at trial. Specifically, Taylor alleges trial counsel: (a) failed to investigate the scene and be aware of the location of the alleged incident; (b) pursued an unreasonable defense by focusing on venue, when minimal investigation revealed venue was proper and when the issue of venue is one for the trial court, not the jury; (c) failed to even speak to potential witnesses prior to trial; and (d) called only one of several possible favorable witnesses at trial without ever having spoken to that witness prior to trial.
2. Trial counsel failed to properly impeach and/or cross-examine the State's witnesses at trial.
3. Trial counsel's handling of Gaye Allen-Cook expert testimony was ineffective. Specifically, Taylor alleges trial counsel failed to: (a) request information regarding her findings prior to trial; (b) object and/or move to suppress her testimony. Alternatively, Taylor argues that post-conviction relief is appropriate based on the newly

discovered evidence that Gaye Allen-Cook would not have taken the stand for the State if given the opportunity to review the case and would have been willing to assist with the defense of Taylor.

4. Trial counsel failed to preserve for appeal the argument that Taylor should not have been sentenced to life without parole based on a previous conviction for CSC with a minor when earlier in the trial, the trial judge allowed evidence of the previous conviction under the common scheme or plan exception.
5. Trial counsel provided ineffective assistance of counsel in his handling of post-trial motions.
6. Trial counsel and appellate counsel did not provide effective assistance of counsel in their handling of the Batson motion matter at trial and on appeal.
7. Appellate counsel failed to raise all meritorious issues on appeal.

At the evidentiary hearing, Taylor testified along with Gaye Allen Cooke, William Eddie Brown, Chad Bernard, Nick Everett, Lina Taylor, John Pezzullo, Michelle Gallagher, Tonya Morton, Pete Skidmore, Jeremy A. Thompson, and Charles D. Barr. By agreement with the State, the testimony of two other witnesses, Zack Webster and Charles Harrison, was submitted by affidavit. After listening to this testimony, carefully weighing the witnesses' credibility, and reviewing the transcript from Taylor's trial, I agree that Taylor received ineffective assistance of trial counsel and grant his application for post-conviction relief.

LAW/ANALYSIS

"A convicted defendant's claim that counsel's assistance was so defective as to require reversal of a conviction . . . has two components." *Strickland v. Washington*, 466 U.S. 668, 687 (1984). First, the defendant must prove that counsel's performance was deficient, meaning the performance "fell below an objective standard of reasonableness." *Franklin v. Catoe*, 346 S.C. 563, 570-71, 552 S.E.2d 718, 722 (2001); see also *Strickland*, 466 at 687. Second, the defendant

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must demonstrate that counsel's deficient performance resulted in prejudice. *Strickland*, 466 at 687. "To prove prejudice, [the convicted defendant] must show there is a reasonable probability that but for counsel's deficient performance, the result of the proceeding would have been different." *Franklin*, 346 S.C. at 571, 552 S.E.2d at 723. The applicant in a PCR hearing bears the burden of establishing his entitlement to relief. *Suber v. State*, 371 S.C. 554, 558, 640 S.E.2d 884, 886 (2007).

I. Trial Counsel Was Deficient for Failing to Investigate

Taylor argues that trial counsel failed to investigate witnesses and that counsel's lack of investigation fell below an objective standard of reasonableness. I agree.

"Without a doubt, [a] criminal defense attorney has a duty to investigate, but this duty is limited to reasonable investigation." *Ard v. Catoe*, 372 S.C. 318, 331, 642 S.E.2d 590, 597 (2007) (quoting *Thompson v. Wainwright*, 787 F.2d 1447, 1450 (11th Cir.1986)). "[W]hile the scope of a reasonable investigation depends upon a number of issues, 'at a minimum, counsel has the duty to interview potential witnesses and to make an independent investigation of the facts and circumstances of the case.'" *Id.* at 331-32, 642 S.E.2d at 597 (quoting *Troedel v. Wainwright*, 667 F.Supp. 1456, 1461 (S.D.Fla.1986) (emphasis in original)).

Courts recognize there are as many ways to try a case as there are lawyers. Accordingly, Courts considering an application for post-conviction relief strongly presume "that counsel rendered adequate assistance and exercised reasonable professional judgment in making all significant decisions in a case." *McKnight v. State*, 378 S.C. 33, 43, 661 S.E.2d 354, 359 (2008). So long as counsel can articulate a reasonable trial strategy, he will not be deemed ineffective.

Id.

Here, trial counsel acknowledged that he never interviewed the other boys who went on the camping trip. Trial counsel claims that his trial strategy was to discredit the victim's testimony in an effort to create a reasonable doubt. If this were so, there is no valid strategic reason why trial counsel would not make some attempt to interview the other boys on the camping trip.

If trial counsel had spoken to the other boys, he may have been able to articulate a valid strategic reason for not calling them as witnesses; however, it is impossible for trial counsel to engage in strategic reasoning without first engaging in some investigation. According to trial counsel, he did not contact the other campers because he had never heard of them. This testimony is either not true or illustrative of counsel's deficient representation.

Had trial counsel properly prepared for this trial, he would have read the victim's statement, which identified Mr. Harrison and Mr. Webster as possible eye witnesses. Additionally, trial counsel received a letter from Taylor in which Taylor named other boys on the camping trip. Furthermore, numerous members of Taylor's family credibly testified that they had provided counsel with the names of the other boys on the camping trip. Indeed, some of the other campers were listed as witnesses on Taylor's pre-trial statement. Accordingly, I find that trial counsel knew of the other campers' identities. I further find that his failure to interview potential witnesses and independently investigate the facts and circumstances surrounding the allegations against Mr. Taylor was objectively unreasonable and was not the result of a valid trial strategy.²

² Taylor argues that trial counsel's strategy was to win an acquittal because the State had failed to prove the crime occurred in Williamsburg County. Taylor argues that such a strategy was unreasonable because (1) the issue of venue is one for the judge, not the jury; and (2) trial counsel would have known the campsite was in Williamsburg County had he engaged in minimal investigation. Taylor called several witnesses who testified that trial counsel discussed

II. Prejudice to Taylor

For a convicted defendant to receive post-conviction relief, he must not only prove that his counsel's performance was deficient, but that the defendant was prejudiced by the deficiency. "Prejudice" in this context means there is a reasonable probability that the result of the proceeding would have been different absent trial counsel's deficient performance. *Franklin*, 346 S.C. at 571, 552 S.E.2d at 723. The PCR applicant bears the burden of proving prejudice, and I find Taylor has met this burden.

At the evidentiary hearing, Taylor provided the affidavits of Zack Webster and Charles Harrison. Taylor also called three young men who were on the camping trip—William Edward Brown, Chad Bernard, and Nick Everett.

Mr. Brown testified that he has known Taylor since Mr. Brown was a child, and he recalled going on the camping trip. He provided vivid details of the trip, which included sleeping side-by-side on a tarp and no tents being set up at the camping site. He recalled Taylor's young son, Griffin, being on the trip and Griffin sharing Taylor's sleeping bag. Mr. Brown recalled waking up early the next morning and getting the fire started. Mr. Brown also remembered telling ghost stories prior to bed and sleeping very lightly. He did not witness anything strange or out of the ordinary. He confirmed that he was never contacted by trial counsel prior to trial and he willingly spoke with Taylor's private investigator prior to the PCR evidentiary hearing. Mr. Brown testified that he would have been willing to testify on behalf of the defense at trial.

this strategy with them, and the trial transcript reflects that trial counsel strenuously argued the issue of venue, particularly in his closing statement. However, at the evidentiary hearing, trial counsel testified that his strategy going into the trial was to discredit the victim and that the issue of venue arose only when the State's law enforcement witness testified uncertainly about the location of the incident. Considering the allegations against Taylor and the sentence he faced of life without the possibility of parole, I find that trial counsel's failure to investigate witnesses was deficient because without such an investigation, counsel was unable to make valid strategic decisions.

Mr. Bernard's testimony was similar to Mr. Brown's. Mr. Bernard testified that he attended Taylor's church and remembered going on the camping trip in question. He recalled some specifics of the campsite, which included sleeping side by side in sleeping bags and no tents being set up at the site. Specifically, Mr. Bernard testified that he had reviewed the victim's statements and disagreed that there was a separate tent set up as victim stated. Based upon his recollection of the campsite, Mr. Bernard believes it very unlikely for the assault to have occurred as the victim described it because all of the boys were sleeping so close together. Mr. Bernard testified that he believes that he would have woken up if Taylor carried away the victim from the sleeping area. Mr. Bernard testified that defense counsel never contacted him prior to trial and that he would have been willing to testify for the defense at trial.

Mr. Everett also testified regarding the camping trip, which he remembered attending as a boy. He testified that he had reviewed the victim's statements and there was no tent set up at the campsite. He testified that nothing out of the ordinary happened during the trip, and he believes he would have woken up if Taylor had arisen during the nighttime because they were all sleeping side by side. Mr. Everett testified that he was not contacted by defense counsel prior to trial and that he would have been willing to testify for the defense if he had been contacted.

Additionally, the affidavits of Zack Webster and Charles Harrison were admitted. Zack Webster testified:

1. I have reviewed the Voluntary Statement of [the victim] dated June 1, 2005, and Voluntary Statement of [the victim] dated November 23, 2005. I have read the trial testimony of [the victim] from the trial of Robert Troy Taylor on July 10-12, 2007.
2. My name is listed in the Voluntary Statement dated June 1, 2005 as possibly seeing the actions at issue. I was on the camping trip on November 6-7, 1998, and I did not witness anything out of the ordinary nor any behavior by Robert

Troy Taylor that was memorable. I do not remember Charles Harrison, who is also listed, on the trip.

3. I do not recall being contacted by Charles David Barr, Esquire, prior to Robert Troy Taylor's trial in July of 2007. I further do not recall receiving a subpoena for July 11th or 12th in 2007. If I had received a subpoena, I would have complied and been present as needed.
4. Prior to being shown the witness list for the State and the defense during the week of November 2nd of 2015 I was unaware that I had been placed on a witness list for either party. I would have been willing to testify for the defense at trial.

(Applicant's Exhibit 1)

Charles Harrison, who the victim identified as being a possible eye witness and who victim claimed had invited him on the trip, testified:

1. I have no memory of attending a camping trip with Robert Troy Taylor and other teenage boys, including [the victim], on November 6-7, 1998 near the Black River nor do I have any memory of witnessing anything as was referenced in [the victim]'s statement dated June 1, 2005.
2. I have verified with my parents that I did not attend the camping trip on November 6-7, 1998 near the Black River.
3. I do not recall being contacted by Charles David Barr, Esquire, prior to Robert Troy Taylor's trial in July of 2007. If I had received a subpoena, I would have complied and been present as needed.

(Applicant's Exhibit 2)

At the trial, the only evidence against Taylor came from the victim, who testified about the Williamsburg County incident and the Georgetown County incident. To refute that testimony, defense counsel called one witness and that witness (Trevor Morton) was related to

Taylor.³ On cross-examination, the State used this familial relationship to demonstrate bias. The other boys on the camping trip were not related to Taylor, and their accounts of the camping trip contradicted the victim's testimony with regard to things like the existence of a separate tent, the absence of Charles Harrison, and whether Taylor slept in the same sleeping bag with his young son. These other boys also expressed doubt that Taylor could have carried the victim away without them noticing. At trial, the case against Taylor was basically the victim's word against the testimony of Taylor's nephew. Had defense counsel called these other, non-related witnesses, the jury may have doubted the victim's story and there is a reasonable probability that the outcome of Taylor's trial would have been different.

III. Additional Issues Raised by Taylor

Taylor raised numerous other issues against both trial counsel and appellate counsel. Each of those issues is addressed in turn below.

A. Batson motion

Taylor alleges counsel was ineffective in the "handling of the Batson motion matter at trial." I agree that trial counsel was deficient, and this deficiency lends further support to my conclusion that counsel was ill-prepared to try Taylor's case; however, I do not find that this deficiency separately prejudiced Taylor.

During direct examination at the evidentiary hearing, Mr. Barr was asked about the reasons he provided for striking juror #146 during the Batson motion. The following testimony was elicited in response:

Q: And can you just kind of explain? I mean were those the reasons why you actually struck her.

³ At trial, Mr. Morton testified that he had not even spoken to defense counsel prior to the day he testified.

A: I didn't want her on the jury. That's why I struck her. I didn't think she would – I didn't – I didn't think she was – Batson is – from the standpoint of trial practice, Batson is the law, but Batson makes a whole lot of lawyers say things that are probably not exactly – and that's just a reality of how it's done.

Q: Uh-huh.

A: And – and anybody that won't admit it don't do it.

Q: Right.

A: But you – you – you decide who you want on a jury and then you develop – now, usually – usually, you know, when you strike somebody, you – you – you usually have a – try to be prepared with a race-neutral reason –

Q: Uh-huh.

A: -- so if you do get a Batson motion from the State that you can justify the strike you were taking.

Q: Right.

A: If I'm not mistaken, there were – there was – there was at least one person that I wanted and, if I had gotten that one person, it would have turned the case.

Q: Right.

A: So I took a chance on getting rid of that lady that I didn't want and maybe playing it along and getting somebody else that I – that I thought that was going to be much more favorable to our position. And when the time – when the time came, in terms of the race-neutral explanation that I attempted to give, Judge – Judge James found it, applying the law – and I agree with the young man who just testified as to the three-prong analysis that the Courts use to decide whether or not Batson has been violated, but the judge decided that Batson was violated. And as – as a result, he made us pick the jury over again.

Q: Did that provide you the opportunity to get the juror that you wanted?

A: No. No, sir.

On cross-examination, the following exchange took place:

Q: Do you recall the juror that you wanted sat when you said that you struck the other juror trying to get to a juror? Do you recall his name?

A: David Pressley.

Q: And why did you want him sat?

A: He's – he's – he's a friend of mine from Hemingway.

A: David Pressley is probably the only person in Williamsburg County that I would call a friend.

This Court finds that Mr. Barr's representation was deficient where he admittedly struck jurors in an effort to seat David Pressley, a friend of Mr. Barr's who Mr. Barr believed would have changed the outcome of the case. As a result of this improper purpose, Mr. Barr struck a number of white jurors and for one of them, juror #146, he provided a non-race neutral explanation. Although a trial attorney's failure to provide a race neutral explanation is not per se deficient performance, where the trial attorney admits that the true reason for striking the juror was to accomplish an improper purpose (i.e., seating a different juror who was a friend of the attorney), such behavior falls below professional norms. Mr. Barr's conduct during jury selection reinforces this Court's finding that trial counsel failed to investigate and prepare for this case because, according to Mr. Barr's own testimony, he relied on winning the trial based on seating a biased juror. To the extent prejudice resulted, it is the same prejudice already addressed above – trial counsel failed to properly investigate and call favorable witnesses on Taylor's behalf.

B. Venue and Failure to Properly Cross-Examine State's Witnesses

Taylor also argues that trial counsel was ineffective by focusing on venue and by failing to impeach and/or cross-examine the State's witnesses at trial. These allegations are encompassed

in the above findings regarding counsel's failure to prepare and investigate, which resulted in his failure to present a reasonable defense.

C. Expert Testimony of Gaye Allen Cooke

Taylor argues that trial counsel was ineffective for failing to request information regarding Gayle Allen Cooke's findings and opinions prior to trial, for failing to discuss those findings with her, and for failing to object and/or move to suppress her testimony. I disagree.

At the evidentiary hearing, Taylor's PCR counsel called Gaye Allen Cooke to the stand. The State stipulated to her expert qualification previously given at the trial in Williamsburg County. With regard to her involvement in the underlying trial, she recalled receiving a call from Kimberly Barr, Assistant Solicitor, and being asked to testify. Ms. Cooke understood that she would testify about the dynamics of child sexual abuse and delayed disclosure. She acknowledged that she was not contacted by defense counsel prior to trial, but testified that she would have spoken to him if he had contacted her. She affirmed that she did not have any knowledge of the victim or the particulars of the case prior to trial.

Turning to the trial, she remembered vividly that the courtroom was packed (standing room only) for Taylor, and empty on the side where she sat for the prosecution. She remembered leaving and thinking that defense counsel could have attempted to discredit her testimony on cross-examination, but it was the easiest cross-examination she had ever experienced.

As to her involvement in the PCR action, she indicated that she reviewed the complete file, including transcripts and the Appendix from the Georgetown case. One document of great interest to her was the South Carolina Department of Social Services Determination Fact Sheet (Applicant's Exhibit 3), which determined that Taylor presented no threat of harm of sexual

abuse to his children. She indicated that she would have asked for further information on the case if this finding had been presented to her prior to her trial testimony.

She explained that she had met with Robert Troy Taylor, Zack Webster, Trevor Morton, Chad Bernard, Tony and Linda Taylor, and Jimmy and Peggy Morris. She explained that she shared her findings from her meetings with PCR counsel and PCR investigator, Pete Skidmore. As to her specific findings, she noted that Zack Webster was very close to Taylor and Webster disclosed that Taylor never attempted to abuse him, which raised a red flag for her. She further explained that the Morrises were missionaries and ran a ministry in Romania involving an orphanage. She learned from them that they had seen Taylor interact with the children at the orphanage and had no concerns.

Ms. Cooke was emphatic that after reviewing the case file and meeting with the above listed individuals, she would not have testified for the State. She made it clear that she does not get involved with every case that she is contacted on and this case has red flags that would have kept her from testifying for the State. She also explained that at this juncture, she is willing to testify for the defense. She also expressed her concern that her testimony was used to bolster the victim's testimony.

This Court heard the testimony of Gaye Allen Cooke and found it to be admissible for the purpose for which it was offered at the evidentiary hearing. Upon review of her trial testimony, this Court finds that her expert testimony was in line with *State v. Weaverling*, 337 S.C. 460, 523 S.E.2d 787 (Ct. App. 1999), and defense counsel was not deficient for never contacting her prior to trial or for not objecting to her trial testimony. She simply testified about generalities and did not vouch for the victim.

Alternatively, Taylor alleges that Gaye Allen Cooke's willingness to now testify on his behalf is newly discovered evidence that should allow him to have a new trial. To prevail on this claim, Taylor "must show that the after-discovered evidence: 1) is such that it would probably change the result if a new trial were granted; 2) has been discovered since the trial; 3) could not in the exercise of due diligence have been discovered prior to trial; 4) is material; and 5) is not merely cumulative or impeaching." *State v. Spann*, 334 S.C. 618, 619, 513 S.E.2d 98, 99 (1999).

Even though Ms. Allen Cooke testified that she would not have assisted the State if provided the information she has since reviewed and received prior to the evidentiary hearing, I find Taylor has failed to establish that her change in position could not have been discovered, in the exercise of due diligence, prior to trial. Additionally, I find that Ms. Cooke affirmed that the testimony she offered at trial was accurate regarding the topics addressed, and this Court struggles to find how her testimony changed the outcome of Taylor's trial. As a result, I deny Taylor's alternative allegation of newly discovered evidence.

D. Trial Counsel's Failure to Preserve Argument against the Imposition of LWOP

Taylor next argues that trial counsel was ineffective for failing to argue that the Georgetown incident should not have been used as a predicate offense to enhance Taylor's penalty to a life without parole sentence when the jury was allowed to hear testimony about that same incident under the theory that it was all a part of a "common scheme or plan." I find Taylor has failed to carry his burden of proof on this issue.

On March 15, 2007, the State served trial counsel with the "State's Notice of Intent to Seek a Sentence of Life without Parole pursuant to §17-25-45 (H), South Carolina Code of Laws." Applicant's Exhibit 16. Prior to the victim taking the stand in July of 2007, defense counsel made a motion *in limine*, seeking to exclude testimony regarding Taylor's prior

Georgetown conviction. The State proffered Victim's testimony, and each party offered arguments regarding the evidence in light of Rule 404(b), SCRE, and *State v. Lyle*, 125 S.C. 406, 118 S.E. 803 (1923). Trial Transcript pp. 135-150. The State primarily argued "common scheme or plan" and provided the trial court with a list of the similarities between the two incidents and noted that the incidents were close in time (within a year of each other). Trial Transcript pp. 125, ln. 18-126, ln. 23. Specifically, defense counsel advanced the following arguments: 1) "In looking at the facts, clearly, we don't have the appropriate components for a *Lyle* exception," and 2) "The prejudice from admitting these confusing statements to the jury would – substantially outweigh any probative value of this information." Trial Transcript pp. 128, lns. 21-23, 129, lns. 5-9. Ultimately, the trial court ruled: "He (victim) can testify as to the events that occurred, but let's stay away from the conviction." Trial Transcript p. 150, lns. 15-18.

Once the jury returned a guilty verdict, the State sought to impose a sentence of life without parole (LWOP) pursuant to section 17-25-45 of the South Carolina Code. Trial Transcript p. 410, ln. 15. Following the State's lengthy argument, defense counsel stated: "Judge, our position is that this offense does not qualify for life without parole." Transcript p. 412, lns. 12-15. After the State responded, the Court had the following conversation with defense counsel:

Court: Mr. Barr, is it your argument that the earlier conviction, the Georgetown county conviction, makes it such that these two convictions one for Kidnapping and one for Criminal Sexual Conduct with a minor in the second degree in this incident we tried, which is it that makes this not qualified for life without parole, is it Georgetown County?

Barr: The date of the offense in the Georgetown County proceedings.

Court: Yes sir. It was after this incident?

Barr: Yes sir.

Trial Transcript p. 414, Ins. 4-14.

Thereafter, the trial court ruled:

Mr. Barr, I don't detect anything in the statute or in the case citations which I have read that talks about the fact that this statutory scheme would not apply because at the time of the offense as it compares to the date of convictions were in. So, if you've got any case citations that would support that, I don't know that they exist, but certainly you made that argument, I deny your motion to quash the notice and of course, if you want to make a motion for reconsideration because you detected a case on that regard you can certainly do that, but I have looked for it myself just in case the situation arose but I do not find it, so I would deny your motion to quash.

(Trial Transcript p. 415, Ins. 9-20.)

Then, the trial court imposed a sentence of life without parole. (Trial Transcript pp. 438-9.)

Following trial, defense counsel filed a motion to reconsider, and a hearing was convened on September 27, 2007. After the trial court pointed out that the crimes occurred approximately nine months apart, defense counsel argued: "Judge, under the circumstances we would definitely take the position that... that with respect to the parties, with respect to the various allegations surrounding these two events that they... they certainly could easily be looked upon as one as opposed to two separate incidents." Reconsideration Transcript pp. 5, 6, Ins. 14-17. Ultimately, the trial judge disagreed, finding:

The defendant's actions did involve a common scheme or plan under *State v. Lyle*; however, there is no authority for the proposition that separate offenses which amount to a "common scheme or plan" under *Lyle* are necessarily "so closely connected in point of time that they may be considered as one offense" under Section 17-25-50. There may be some factual scenarios in which the conclusion argued by the defendant is correct, but under the circumstances of this case, the existence of a common scheme or plan under *Lyle* does not warrant a finding that the Williamsburg and Georgetown crimes were part of one continuous course of conduct under Section 17-25-50. Therefore, the LWOP notice should not be quashed on this basis.

On appeal, the following issue was argued in the Brief of Appellant: "The lower court improperly sentenced the Appellant to life without parole because the substantive facts of the predicate offense were admitted as common scheme or plan evidence." Brief of Appellant p. 22.

Specifically, the following argument was made:

S.C. Code Ann. §§17-25-45(F) and 17-25-50 must be construed together. State v. Gordon, 356 S.C. 143, 588 S.E.2d 105 (2003). §17-25-50 precludes an LWOP sentence "when the multiple offenses are inextricably connected and share an immediate temporal proximity." Bryant v. State, 384 S.C. 525, 532, 683 S.E.2d 280, 284 (2009). In other words §17-25-50 prevents the imposition of an LWOP sentence when the offense of conviction and the predicate offense(s) constitute "one continuous course of conduct." Gordon at 151, 588 S.E.2d at 109. "The cases which have found 'one continuous course of conduct' under §17-25-50 have been cases in which, for example, the defendant had two convictions arising out of a single incident; or situations which involve crimes closely connected in point in time; or apply to a single, continuous crime spree." Koon v. State, 372 S.C. 531, 533-534, 643 S.E.2d 680, 682 (2007) (internal citations omitted).

The Appellant would contend that where, as here, substantive facts of prior convictions are admitted as common scheme or plan evidence pursuant to Rule 404(b), SCRE, those prior convictions cannot be used as predicate offenses under the "continuous crime spree" definition of "one continuous course of conduct" given in Koon. If evidence of another crime is so closely connected to the crime for which the defendant is on trial for committing, as was posited by the State in this case, then the "common scheme or plan" then the offenses must be "inextricably connected," and should be treated as "one continuous course of conduct" worthy of §17-20-25's protections. See Bryant, *supra* at 532, 683 S.E.2d at 284.

Brief of Appellant p. 24.

On December 21, 2011, the South Carolina Court of Appeals issued an Opinion affirming Applicant's conviction and sentence. State v. Taylor, 396 S.C. 193, 720 S.E.2d 522 (Ct. App.

2011) (hereinafter *Taylor I*). In regards to the issue raised regarding the imposition of the life sentence, the Court held:

We find the issue of whether the crimes should have been considered one serious offense due to their close temporal proximity and inextricable connection is unpreserved because our review of the record reveals Taylor never raised it during trial. *Wilder Corp. v. Wilke*, 330 S.C. 71, 76, 497 S.E.2d 731, 733 (1998) (stating an issue must be "raised to and ruled upon by the trial judge to be preserved for appellate review") (emphasis added); *State v. Curriker*, 269 S.C. 553, 555, 238 S.E.2d 678, 678 (1977) (finding issue unpreserved because it was not raised by the appellant). Taylor appears to approach the issue at the post-trial motion hearing. Even so, this is insufficient to preserve the issue for our review because it was not raised at trial. *See Dixon v. Dixon*, 362 S.C. 388, 399, 608 S.E.2d 849, 854 (2005) (holding that an issue first raised in a post-trial motion is not preserved for appellate review); *see also Wilder*, 330 S.C. at 77, 497 S.E.2d at 734 (holding post-trial motions are not necessary to preserve issues that have already been ruled on; they are used to preserve those that have been raised to the trial court but not yet ruled on by it). The balance of the argument on the issue at the post-trial motion hearing was raised by the trial court, which is also insufficient to preserve the issue for our review. *Duncan v. Hampton Cnty School Dist. No. 2*, 335 S.C. 535, 545, 517 S.E.2d 449, 454 (Ct. App. 1999) (finding issue unpreserved where it was raised sua sponte by the trial court and not by the respondent). Furthermore, on appeal, Taylor argues "[t]he [trial court] improperly sentenced [Taylor] to life without parole because the substantive facts of the predicate offense were admitted as common scheme or plan evidence." However, at trial and during argument on his motion to reconsider, Taylor repeatedly maintained the trial court erred in sentencing him to life without parole because the predicate most serious offense, the 1999 rape, occurred after the 1998 rape. Taylor cannot argue one ground for error at trial and a different ground for error on appeal. *See State v. Haselden*, 353 S.C. 190, 196, 577 S.E.2d 445, 448 (2003). Accordingly, this issue is not preserved for our review.

Taylor I, 396 S.C. 193, 205-06, 720 S.E.2d 522, 528-29 (Ct. App. 2011).

By way of a footnote, the Court further stated:

Taylor contends, in a persuasive argument, that the definition of "inextricably connected" and "continuous course of conduct," as

applied to these facts, entitles him to lenity or other relief in the application of section 17-25-50. However, he did not raise this issue at trial; thus, we are bound by the laws of preservation.

Taylor I, 396 S.C. 193, 205 n.4, 720 S.E.2d 522, 528 n.4 (Ct. App. 2011).

After both parties petitioned for rehearing, the Court of Appeals refiled its Opinion on June 6, 2012. By way of the refiled Opinion, the Court again found the issue was not properly preserved by trial counsel for appeal, but no longer described Taylor's argument as "persuasive." *State v. Taylor*, 399 S.C. 51, 62-63, 731 S.E.2d 596, 602-3 (Ct. App. 2012) (hereinafter *Taylor II*).

When asked about the LWOP issue, Mr. Thompson (appellate counsel) explained the argument he made on appeal. According to Mr. Thompson, the Court was very interested in the issue based upon the questioning of the State at oral argument. Recalling his argument in front of the Court of Appeals in regards to preservation, Mr. Thompson stated: "I'm dealt the hand I'm dealt. I can't change the way that it – that it was argued." When asked if it would have aided his argument if he did not have to be concerned with preservation, he responded: "Absolutely, that's why we lost."

Because this issue was found to be unpreserved on direct appeal, Taylor has properly raised this issue in his application for post-conviction relief. *McLaughlin v. State*, 352 S.C. 476, 483 n.2, 575 S.E.2d 841, 844 n.2 (2003); see also *Foye v. State*, 335 S.C. 586, 518 S.E.2d 265 (1999), cert. denied, 529 U.S. 1072, 120 S.Ct. 1685, 146 L.Ed.2d 492 (2000) (holding that an issue raised on direct appeal but disposed of on preservation grounds may be raised in PCR proceeding). For Taylor to prevail in his post-conviction relief action, however, he bears the burden of proving that his appeal would have been successful if this issue had been preserved for review. I find that Taylor has not met this burden.

Although the Court of Appeals initially described Taylor's argument as "persuasive" in its *Taylor I* opinion, the Court of Appeals withdrew that opinion and issued *Taylor II*, which found only that the argument was not preserved. No other appellate decision has addressed this specific issue. However, a review of section 17-25-50 and the Supreme Court's interpretation of the language used in that statute suggest that Taylor would not prevail on appeal.

Section 17-25-50 states:

In determining the number of offenses for the purpose of imposition of sentence, the court shall treat as one offense any number of offenses which have been committed at times so closely connected in point of time that they may be considered as one offense, notwithstanding under the law they constitute separate and distinct offense.

The South Carolina Supreme Court reviewed this statute in *Bryant v. State*, 384 S.C. 525, 683 S.E.2d 280 (2009), and stated:

We acknowledge the "so closely connected in point of time" language in section 17-25-50 may become ambiguous as applied to certain situations. When construing statutes forming part of the same legislative scheme, we must examine the statutes together as a whole. Accordingly, when we read the unambiguous timing feature of "a prior conviction" under section 17-25-45(F) alongside section 17-25-50, we construe the language of section 17-25-50 to preclude a life without parole sentence when the multiple offenses are inextricably connected and share an immediate temporal proximity.

384 S.C. at 532, 683 S.E.2d at 283-84.

Here, the Williamsburg County and Georgetown County incidents did not share an immediate temporal proximity, as required by section 17-25-50. The Williamsburg County camping trip occurred in November 1998 and the Georgetown County incident occurred in August of 1999, nine months later. Accordingly, I do not believe Taylor has satisfied his burden of proving that he would have prevailed on this issue if it had been preserved for appeal. To the

extent Taylor alleges additional issues relating to trial counsel's handling of the post-trial motion, I find Taylor has failed to demonstrate that trial counsel's performance was deficient or that Taylor was prejudiced.

E. Allegations against Appellate Counsel

Taylor also alleges that Mr. Thompson, his appellate counsel, was ineffective for failing to raise all meritorious issues on appeal. Specifically, Taylor claims that appellate counsel should have argued that the trial court erred in overruling defense counsel's objection to the officer testifying about Victim's verbal statement to her about the time and place of the alleged rape when that verbal statement was not provided to the defendant prior to trial. I disagree.

"Although appellate counsel is required to provide effective assistance of counsel, 'appellate counsel is *not* required to raise every nonfrivolous issue that is presented by the record.'" *Tisdale v. State*, 357 S.C. 474, 476, 594 S.E.2d 166, 167 (2004) (quoting *Thrift v. State*, 302 S.C. 535, 539, 397 S.E.2d 523, 526 (1990)(emphasis in original). "For judges to second-guess reasonable professional judgments and impose on ... counsel a duty to raise every 'colorable' claim suggested by a client would disserve the very goal of vigorous and effective advocacy...." *Jones v. Barnes*, 463 U.S. 745, 754 (1983).

At the evidentiary hearing, Mr. Thompson testified at length about the process he used to determine what issues to raise on appeal. Mr. Thompson considered the time and place objection and decided not to raise it because he did not believe it had merit. Taylor has failed to carry his burden of proving why this issue should have been raised, nor has he proven that his appeal would have been successful if the issue had been raised.

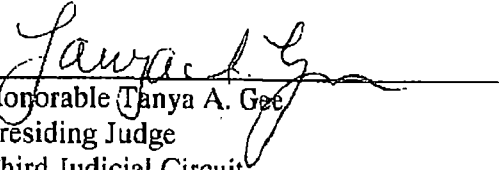
CONCLUSION

Based upon the foregoing, this Court grants Taylor's Application for Post-Conviction for the reasons stated above. To the extent Taylor raised additional arguments that were not addressed in this Order, this Court finds those argument were waived because he did not present evidence to support them during the evidentiary hearing.

IT IS THERFORE ORDERED:

1. That Robert Troy Taylor has met his burden of proof as to his specific allegation of ineffective assistance of trial counsel as detailed above;
2. That Robert Troy Taylor has not met his burden of proof as to his allegation of ineffective assistance of appellate counsel;
3. That Robert Troy Taylor has not met his burden of proof as to his allegation of newly discovered evidence;
4. That Robert Troy Taylor's Application for Post-Conviction Relief is granted, that his convictions for second degree criminal sexual conduct and kidnapping are vacated, and that he is granted a new trial;
5. That Robert Troy Taylor shall be transferred from the custody of the South Carolina Department of Corrections to the custody of Williamsburg County pending the disposition of his criminal case, with normal bond proceedings.

AND IT IS SO ORDRED this 19th day of February, 2016



Honorable Tanya A. Gee
Presiding Judge
Third Judicial Circuit

Columbia, South Carolina

Robert Troy Taylor – 315084
Greenwood B-2115
Broad River Correctional Institution
4460 Broad River Road
Columbia, SC, 29210

To the Honorable Judges of the South Carolina Supreme Court,

Thank you in advance for considering this request for an Appellate Bond. I realize that you are very busy and that you read many different documents each day; therefore, I plan to be brief. My attorney, Tricia Blanchette, explained this process to me and, in so doing, said that my case had to be “exceptional” in order for you to grant the bond.

As I prayed about what I should write, I quickly realized, and hereby confess, that in and of myself I am not an exceptional man – however, there are some exceptional people, experiences, and issues that I’d like you to consider: my family; my support system; how I’ve lived during my incarceration; and the comparisons and contrasts of my life before incarceration while I was out on bond and what my life will be like on Appellate Bond.

FAMILY

I have three children; two sons (Marius and Griffin) and a daughter (Logan). Griffin (20) and Logan (18) have lived with my ex-wife in Myrtle Beach and have been kept from me and my family for the entirety of my incarceration (10+ years). Marius (28) is adopted from Romania and served in the US Marine Corp for 4 years. He and his wife, Ingrid, recently gave me my first granddaughter, Catherine Lucia Taylor (6 months). They live in McAllen, TX, where they moved after Marius’ Marine tour. I also have Mirela whom I call my Romanian daughter. She was my interpreter when I did mission work in Romania and I helped her come to the USA where she attended college and lived with us. She lives in Myrtle Beach with her South African husband, Werner du Toit.

In 2011, the Lord brought a dear friend into my life named Nancy. We eventually fell in love and are engaged. She has three children (Madison, Joshua and Jacob), a wonderful extended family, a home, a successful career, and a dog and a cat. Nancy and her children are very involved in my life, their church, and their community. Nancy also does medical missionary work in Rwanda.

I am blessed to be Tony and Linda Taylor's son. They have always been and continue to be amazing parents; full of love, joy, and patience – and believe me, I've tested them through the years. They are now in their 70s and both are having health issues – Dad's kidneys are failing, as years of diabetes have caused this and other health issues. I have three sisters and a brother who died 30 years ago.

My sisters have given me wonderful brothers-in-law, three nieces, four nephews, and two great-nieces. I have too many 1st, 2nd, 3rd, etc. cousins to count and the same goes for uncles and aunts. All of my family members are connected to their communities, schools, businesses, and churches. As you can see, I have an exceptional family.

SUPPORT SYSTEM

My family is a very important part of my support system, and they are joined by numerous friends and pastors. Though the accusations against me were very public, I still have a large number of friends who support me. A few examples are:

- Tom Filchak of Pawley's Island, SC, who is a Bible counselor, Pastor, and works in a Christ-centered drug and alcohol rehabilitation center. Tom is my counselor and accountability partner.
- Dr. Craig Cohen, a chiropractor in Murrells Inlet, SC, who, along with his parents and brother, were each members of my church and dear friends. Craig is a wonderful man, friend, and accountability partner.
- Dr. Brian Adler, a General Practitioner Physician in Surfside Beach, SC, who has been a great source of accountability and comfort to me and my family.
- Marion and Jeanette Hutson of Cayce, SC, who are close friends of my parents since childhood. Marion has been a frequent visitor of mine and a faithful, encouraging pen-pal.
- Larry and Laurie Tyree of Daniel Island, SC, are close friends and confidants. Larry is a huge part of my life and an accountability partner.
- Faraja Greene of Charleston, SC, a church-going, mission-minded, powerhouse for God. She is a dear, faithful friend.

I cannot imagine life without these people, but they are only a small fraction of people I could name who support me. And, they are joined by pastors like:

The following is a list of the names of the persons who have been appointed to the various positions in the office of the Secretary of the State of New York, for the term ending on the 31st day of December, 1900.

Secretary of the State: William C. Clegg.
Comptroller of the State: William C. Clegg.
Treasurer of the State: William C. Clegg.

Commissioner of the State: William C. Clegg.
Commissioner of the State: William C. Clegg.
Commissioner of the State: William C. Clegg.

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Commissioner of the State: William C. Clegg.

Commissioner of the State: William C. Clegg.

➤ Steve Fairchild of Low Country Community Church (LC3) in Murrells Inlet, SC. Steve accepted Christ as we played the back nine of Wicked Stick Golf Course. I baptized him and his family; he and Anne, his wife, became business partners with me in some restaurants; I ordained Steve as an Elder at LC3; and, he is now the Senior Pastor of LC3. He is one of my closest friends and accountability partners.

Steve was at my PCR Hearing and stands ready to testify again.

➤ Jeff Dunn of Christ Community Church in Myrtle Beach, SC. Jeff is an old family friend who embraced me from the beginning. He will be an important accountability partner upon my release.

➤ Julian Riddle of Surfside Presbyterian Church of Surfside Beach, SC. He is a pastor and a dear friend to me. He will be an accountability partner upon my release.

➤ Robbie Hayes of South Strand Assemblies of God in Murrells Inlet, SC. Robbie has been in my life for almost as long as I can remember. He has supported me and been a source of strength, encouragement, and accountability.

➤ Wayne Miller of Myrtle Beach, SC. Wayne is a spiritual father to me and a constant source of love, wisdom, and accountability.

➤ Dr. Wayne Brown is the Chaplain of Ocean Lakes Family Campground in Myrtle Beach, SC. I've known Wayne since he was the Senior Pastor of Myrtle Beach First Baptist Church. Wayne has been a constant source of love, wisdom, and accountability.

➤ Jimmy and Peggy Morse of Murrells Inlet, SC. These two changed my life in so many ways. It was Jimmy who had me preach my first sermon while the two of them rushed to a newly-freed Romania after the Christmas 1989 Coup. Later, I and LC3 partnered with them to build orphanages in Romania. It was through their ministry that I met and adopted my son, Marius. Jimmy and Peggy are amazing examples of godly people.

➤ SCDC Chaplains and volunteers – I have been blessed to meet and work for/with many godly people in SCDC. I have maintained many of these

relationships and have been blessed to have them speak into my life as encouragers, supporters, and accountability partners.

Again, this is just a small example of my vast group of supporters.

LIFE DURING INCARCERATION

During my incarceration, I have lived my life with the thought that I am leaving a legacy for my children. Though I've lost so much, I refuse to give into bitterness or to wallow in self-pity. Some of the activities I've done are Chairman of the Inmate Representative Committee (IRC); GED Tutor; Chaplain's Assistant; Praise Team member and leader (I sing tenor and lead; and I play bass guitar, piano/keyboards, and harmonicas); I was a Coordinator in the Character Dorm at Lee County CI called BLIC and I was a member of the Character Dorm at Perry CI called CBU – in these dorms I taught Music Theory I & II, Victory Over Grief, Computer Literacy, and various Bible studies. I've graduated from Bee Keeping, Carpentry, and many other classes.

I attended and graduated from the Columbia International University/CIU Prison Initiative with my Associates in Arts in Biblical Studies. This program was started by former SCDC Director John Ozmint and is very selective in its membership. I am currently one of 32 CIU Graduates who have been selected to work for SCDC as "observers" in the brand-new Crisis Stabilization Unit/CSU at Broad River CI. It is here that I've found joy in helping men overcome suicidal thoughts/actions and find peace and hope.

I have formed some strong friendships along the way and many of my friends wrote letters that I have enclosed with this petition for your perusal. One man that I befriended, Richard Gagnon, was incarcerated with a Life Without Parole sentence and claimed that he was innocent. I had met a jailhouse snitch, Bobby Mullins, who confessed to me that he had lied to the District Attorney, falsely testified against Richard Gagnon, and helped the Prosecution to build a false case against Richard. I was called as a witness and testified to all that I knew. The judge accepted my testimony and Richard's case was remanded back for a new trial. Richard is now free, remarried, and the charges against him dropped. A news article concerning this case has been included with this petition for your perusal.

As you can see, I've continued to live a full and meaningful life while incarcerated even though the crime that I was accused of has made my incarceration even harder and brought much danger to me. I've been attacked and had to defend myself; I've been separated from my children and loved ones; I've laid awake at nights in fear and doubt; I've seen men stabbed, beaten, and killed; and, I can only say that it is by the power of God and for His glory that I'm still safe and sane. You see, my former life was altogether different.

LIFE BEFORE INCARCERATION AND ON BAIL

My life before incarceration had already been upended by the accusations against me. I lost my wife and my family; I lost my ministry; I had to sell my businesses to support me and my children; and countless other losses. Yes, things were different; but, with the help of my support system I persevered.

After being arrested, I remained free on bail from autumn of 2003 until April 20th, 2006. During this time, I continued to live in my hometown of Murrells Inlet and met every stipulation of my bail. I went on my own to DSS and they documented that I presented NO risk of harm or danger to my children; therefore, I had shared custody of Griffin, Logan, and Marius – though Marius was with me approximately 98% of the time. I worked with the bondsmen and Solicitor so well that they allowed me to travel extensively with my children.

I also joined the Holy City Quartet of Mt. Pleasant, SC, as their tenor vocalist and bass player. We traveled all over the Southeast from Orlando, FL, to Louisville, KY.

I became a Realtor and worked for Century 21. I started a construction cleaning business and then a construction company after I passed the SC General Contractor's License test and requirements. All of this was done while I supported me and my family by waiting tables at a local Thai restaurant. Again, all of this was done while I was on bail.

I submit to you that I am not a flight risk. As a matter of fact, it is my desire to be completely exonerated and to rebuild my life. I continued living in my hometown even though I could have moved. I was falsely accused and I fought in court; though I had numerous opportunities to take a plea bargain. I stood in front of the court at the

sentencing phase and I didn't ask for mercy – I maintained my innocence. I restate this to show you that I've been consistent and at last the truth has been made known.

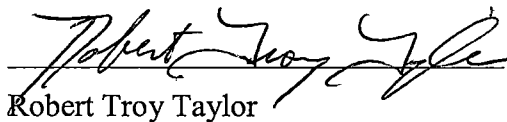
At my PCR Hearing on November 19, 2016 (9 years and 5 months after my July 2007 trial), 12 witnesses took the stand in my defense and proved that my accuser had lied, that I am innocent, and that my trial attorney gave ineffective assistance of counsel. Judge Gee ruled in my favor and said that I should be moved to the county and given a new trial. The courtroom was packed to standing room only with my supporters – many who stood ready to testify if needed. My accuser never showed up!

Your Honors, if you grant me this Appellate Bond, this is how my life will look. I will marry Nancy and live with her and work to reconcile and reunite with Griffin and Logan. I will finally get to meet my daughter-in-law and hold my granddaughter, Catherine. I will be able to assist Mom and Dad and make their lives easier (I believe my release will greatly reduce their anxiety and stress and that my presence will help Dad's health improve).

Nancy and I started The Ephraim Project/TEP – a ministry that supports the CIU Prison Initiative Grads as missionaries to the incarcerated. I will oversee the various operations of TEP. I will travel as a gospel singer/worshipper and share my testimony. I plan to start a business utilizing food trucks in our area. I also plan to buy some honeybees and start an apiary – skills I've learned while incarcerated.

I won't stop living whether you grant or deny the Appellate Bond! In fact, I'll kick it in turbo either way. However, I plead with you to examine my situation; to read the numerous documents; to hear the voices of those who have written the letters we've submitted; and to grant me grace by giving me an Appellate Bond so that I may begin my new life and help my parents.

Thank you in advance,


Robert Troy Taylor

I leave you with my life-verse for this chapter of my life:

“The Lord has made me fruitful in this land of my suffering.” – Genesis 41:52

Richard Gagnon serving two life sentences in pair of 2005 deaths

By Tonya Root
troot@thesunnews.com

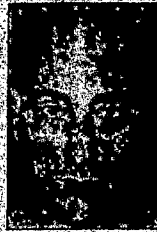
MYRTLE BEACH A new trial was ordered for a 40-year-old man serving a life sentence in prison for the shooting deaths of an Horry County couple.

Circuit Court Judge Steven John issued an order Monday granting Richard Gagnon a new trial. The order comes four months after Gagnon appeared before John seeking a new trial and citing new evidence.

It is unclear when Gagnon's case will be tried.

Gagnon was convicted in the deaths of Diane and Charles Parker Sr., who were found shot to death on the morning of April 12, 2005, inside their home in the Nixonville community off S.C. 90 near S.C. 22. The Parkers owned and operated a business, Mirrortec, on their property and workers found their bodies inside the home.

Gagnon was convicted in their



Gagnon

John ruled that Gagnon deserved a new trial after the testimony of Robert Troy Taylor, who was convicted on unrelated charges in Georgetown County and had served time in prison alongside Robert Mullins, a man who said he lied in court about Gagnon. John ruled that Taylor's testimony

deaths and ordered to serve two life sentences on two counts of murder and 30 years in prison for first-degree burglary. The sentences were ordered to run concurrently.

TAKE A POLL

Do you agree with the judge's decision to give Richard Gagnon a new trial? Take the poll at MyrtleBeachOnline.com.

was new evidence and met the criteria to grant Gagnon a new trial.

"Mr. Taylor's testimony was discovered after trial and could not have been discovered before trial in the exercise of due diligence because of the dates that Taylor was imprisoned with Mullins and Gagnon," John wrote in the order. "The court finds the testimony to be material because

See **TRIAL** | Page **5A**

charge of mail fraud and one charge of structuring financial transactions to evade the reporting requirement banks must follow for deposits exceeding \$10,000. The charges carry a combined maximum sentence of 25 years in prison and \$500,000 in fines.

The guilty plea was part of an agreement in which prosecutor would drop seven additional mail fraud charges and five money laundering charges. Judge Bryan Harwell deferred his decision on whether to accept or reject the terms of the plea agreement during a hearing Wednesday in Florence.

Evans was indicted on the charge.

See **PASTOR** | Page **5A**

TRIAL

From Page 1A

it squarely attacks the credibility of a major piece of evidence the state used in its case against Richard Gagnon, and because it is the only testimony of this type existing, it is not merely cumulative and impeaching."

During an appeal hearing in October, Taylor testified that Mullins lied at Gagnon's initial trial when he insinuated that Gagnon had confessed to his part in the murders.

Taylor, who is also serving a life sentence in South Carolina, said he was in the same jail as Mullins and that Mullins had told him at least four times between 2006 and 2007 that he had lied and Gagnon was wrongfully in prison because of it.

Taylor testified he did not come forward sooner because he would have been called a snitch.

Taylor said he had put Mullins' story out of his mind until he met Gagnon at Lee Correctional Institute and decided that he couldn't stand to see an innocent man stay in prison if he could do something about it.

During a September hearing, Nico Coty Toscani, said Mullins had admitted the same lie while the pair was incarcerated together at Tyger River Correctional Institute.

Gagnon's appeal was heard by the S.C. Court of Appeals after the conviction of Bruce Antwain Hill, 27, of Tabor City, N.C. in September 2011. Hill was



Defense witness Robert Troy Taylor testified when Richard Gagnon went back to court in Conway for his petition for a new trial.

FILE PHOTO BY STEVE JESSMORE, sjessmore@thesunnews.com

sentenced to life in prison without the possibility of parole and 30 years on a first-degree burglary charge, with those sentences running concurrently.

Horry County police charged Hill in 2009 after his DNA sample, which was taken when he was committed to the Tennessee Department of Corrections

to serve a seven-year prison sentence; was uploaded into a national database and linked to the Parkers' deaths, according to authorities.

Hill is serving a sentence in Tennessee after he pleaded guilty to robbery and conspiracy to commit aggravated robbery in connection with a Nov. 15,

2006, incident there. His sentence is expected to be up in 2014.

Hill was returned to Horry County in October, but he invoked his Fifth Amendment right and refused to testify in Gagnon's appeal.

Gagnon, who had dated Diane Parker's daughter, Bambi Bennett, has de-

nied playing a role in the slayings and during a hearing in September. Gagnon denied knowing Hill.

Bennett also was charged in the deaths of her mother and stepfather but prosecutors later dropped those charges. She also denied knowing Hill.

Prosecutors linked Gagnon to the crimes after blood was found on Gagnon's shoes, which was linked to Charles Parker Sr.

But Gagnon said he got blood on his shoes after he went inside the Parker home after police and crime scene had left and removed crime scene tape.

Gagnon said he went inside the home to retrieve car keys, a cell phone and Diane Parker's purse for Bennett. Bennett, after being questioned by police, had left her purse in a police vehicle that drove away, according to testimony.

Bennett testified that Gagnon came out of the Parkers' house and said he had stepped in some blood, so she told him to wash it off.

Gagnon said he got the blood on his shoes when he went to close window blinds to keep Bennett from seeing the blood on the floor in the bathroom where Charlie Parker Sr. was found.

"I tried to step around it as best I could," Gagnon said during the September hearing.

Gagnon testified he was at home with Bennett and her two children when police said the Parkers were killed.

Contact TONYA ROOT at 444-1723.

CONWAY Lifer gets break in double murder

Murder charges have been dismissed against an Horry County man once given a life sentence in the slaying of a married couple.

Local media outlets report Friday that prosecutors have dropped charges against Richard Gagnon.

Gagnon was convicted in 2008 in the deaths of Diane and Charles Parker Sr.

The main witness was an inmate who said Gagnon confessed. A second inmate said the first prisoner lied.

Another man pleaded guilty after he was linked to DNA found at the scene.

Compiled from wire reports

5-5-15



NIKKI R. HALEY, Governor
BRYAN P. STIRLING, Director

Rev. Phillip Eason
Broad River Correctional Institution
4460 Broad River Road
Columbia, SC 29210

May 18, 2016

The Supreme Court of South Carolina
1231 Gervais Street
Columbia, SC 29210

To whom it may concern,

I'm writing concerning South Carolina Department of Corrections inmate Troy Taylor (#315084). I serve as the Senior Chaplain at Broad River Correctional Institution where Mr. Taylor is currently living and working in our Greenwood Crisis Management Unit.

Mr. Taylor was selected for Columbia International University's (C.I.U.) "Prison Initiative" and graduated with an Associates of Arts degree in Biblical Studies while in the Department of Corrections. His being selected for the cohort is a testament to his behavior and his resume. Hundreds of inmates across South Carolina apply for this opportunity each year—seventeen are selected. Upon graduation, Mr. Taylor served the chapel at Perry Institution in Pelzer, SC, but was recently selected for the unique opportunity to work in the new Crisis Management Unit here at Broad River in 2016. As the name implies, Mr. Taylor is part of a highly-trained team that helps SCDC and the Dept. of Mental Health effectively deal with men in crisis across South Carolina.

I have learned about changes in the status of Mr. Taylor's case and simply want to report that he is not only a highly successful graduate of C.I.U., but he is also a leader in the Broad River Gospel Choir, where he plays bass, piano, sings, and helps others that do not have his high level of training in music.

Sincerely,

A handwritten signature in black ink, appearing to be "P. Eason", written over a large, light-colored circular scribble.

Rev. Phillip Eason
Senior Chaplain, Broad River Correctional Institution

Columbia International University

*The Trustees of
Columbia International University
upon the recommendation of the Faculty have conferred upon*

Robert Troy Taylor
the degree of
Associate of Arts

with all honors, rights and privileges appertaining thereto.

*Given at Columbia in the State of South Carolina, in this
month of December, in the year of our Lord two thousand thirteen.*

J. Russell Williams
Chairman of the Board of Trustees



William H. Jones
President

CERTIFICATE OF COMPLETION

This certificate is awarded to

ROBERT TROY TAYLOR

Fifteen Hours of Training

COMPARATIVE RELIGION



John R. Houser

Chaplain (Doctor) John R. Houser
Senior Chaplain, KRE

12/03/13

Date

Barbara S. Houser

Chaplain (Doctor) Barbara S. Houser
SCDC Volunteer Chaplain

12/03/13

Date



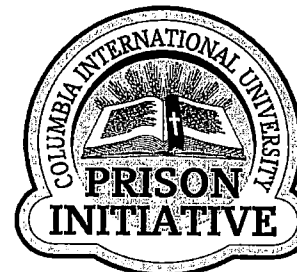
CERTIFICATE OF ACHIEVEMENT

This certificate is awarded to

ROBERT "TROY" TAYLOR

In Recognition of IT Training from

COLUMBIA INTERNATIONAL UNIVERSITY



Raymond E. Bege

Academic Dean

Carl Z. ...

Program Director

7-5-12

Date

7/10/12

Date

CERTIFICATE OF ACHIEVEMENT

This certificate is awarded to

ROBERT TROY TAYLOR

In Recognition of IT Training from
COLUMBIA INTERNATIONAL UNIVERSITY



[Signature]

Academic Dean

[Signature]

Program Director

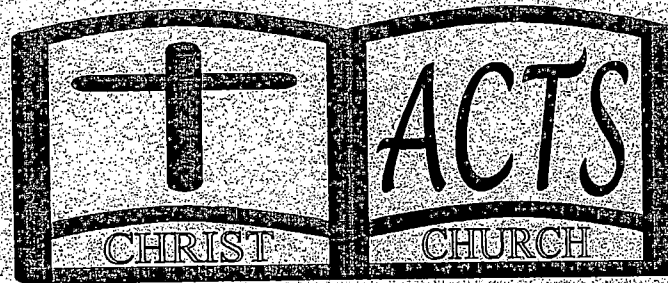
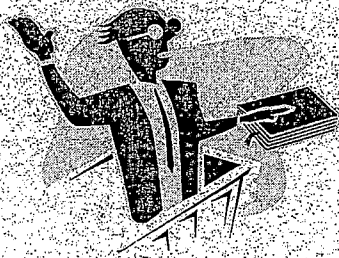
12/13/13

Date

12/13/13

Date

**SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
CHRIST CHURCH INTERNATIONAL OF COLUMBIA
CERTIFICATE OF ACHIEVEMENT**



“You shall receive
power when the
Holy Spirit has
come upon you...”

THIS CERTIFIES THAT:

TROY TAYLOR

**HAS FAITHFULLY PARTICIPATED IN THE
THE BOOK OF ACTS MINISTERIAL TRAINING CLASS**

GIVEN AT KIRKLAND CORRECTIONAL INSTITUTION

This 17TH day of October 2013


BERNARD MCKIE, WARDEN


NENA STALEY, A/W


JOHN HOUSER SR., SENIOR CH

Palmetto Unified School District No. 1

Certificate

of

Achievement

This Certifies That

Robert T. Taylor

is Awarded this Certificate for

NCCER 10 HOUR SAFETY ORIENTATION

Given at Can C. F., this Nov. day of 20, A.D., 20 06

H. L. Burt

Instructor

Ronald McFadden

Principal

Certificate of Appreciation

Is hereby presented to

R. Troy Taylor

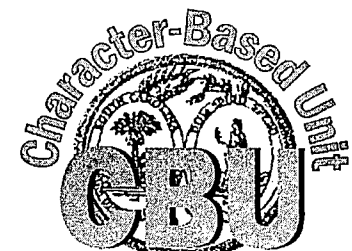
for

his diligence and dedicated service as an instructor within the Perry Character Based Unit. His resourcefulness, tireless efforts, and unselfish willingness to impart his knowledge with his fellow residents has immensely enhanced the educational programming within the CBU.

Instructed

Education Initiative (Tutor)


The CBU Committee April 9, 2015



Rehabilitation Program
Perry Correctional Institution

Certificate of Completion

Is hereby presented to

R. Tray Taylor
for

his successful completion of the following Perry Character-Based Unit classes during the Fourth Quarter of 2015. His efforts are reflective of the values, attitudes, and diligence which are indicative of a CBU member.

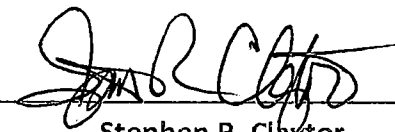
Computer Literacy (Instructor)

Military History - WW2 (Adv)

Music Theory (Basic) (Instructor)

The Writers Block

Victory Over Grief (Instructor)



Stephen R. Claytor

Associate Warden for Programs
& CBU Program Director



Certificate of Completion

Is hereby presented to

R. Troy Taylor
for

his successful completion of the following Perry Character-Based Unit classes during the Third Quarter of 2015. His efforts are reflective of the values, attitudes, and diligence which are indicative of a CBU member.

*College Football 101
Military History - World War 2
Music Theory (Basic) (Instructor)*



Stephen R. Claytor
Associate Warden for Programs
& CBU Program Director



Rehabilitation Program
Perry Correctional Institution



Certificate of Completion

Perry CBU Therapy Dog Program

For successful completion of the 12-week
Perry CBU program in the 1st Quarter of 2015

R. Troy Taylor

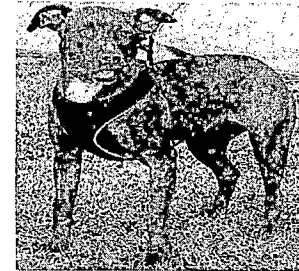


Charles W. Connor
Signature of Instructor

[Signature]
Signature of Program Director

11 May 2015
Date

5-13-15
Date



Certificate of Completion

Is hereby presented to

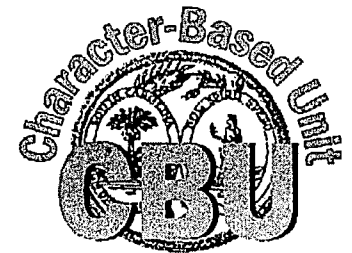
R. Troy Taylor
for

his successful completion of the following Perry Character-Based Unit classes during the Second Quarter of 2015. His efforts are reflective of the values, attitudes, and diligence which are indicative of a CBU member.

*Military History - Part I
Spanish Language (Basic)
Victory Over Grief*



Stephen R. Claytor
Associate Warden for Programs
& CBU Program Director



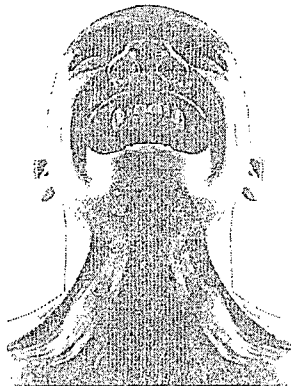
Rehabilitation Program
Perry Correctional Institution

Certificate of Completion

THIS CERTIFICATE IS AWARDED TO

Troy Taylor

IN RECOGNITION OF COMPLETING THE CBU COURSE
ANGER & STRESS MANAGEMENT



Timothy Clement

SIGNATURE

1-15-15

DATE

Chris J. [Signature]

SIGNATURE

1-15-15

DATE



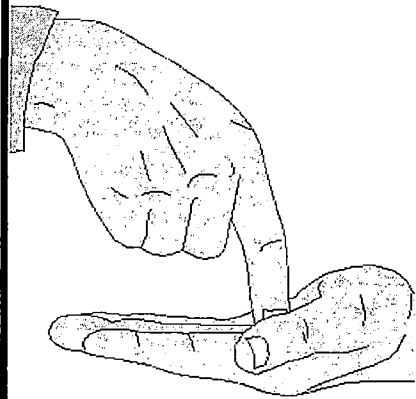
Certificate of Completion

THIS CERTIFICATE IS AWARDED TO

Troy Taylor

IN RECOGNITION OF COMPLETING THE CBU COURSE

SIGN LANGUAGE III



Ritch Z. O'Connell

SIGNATURE

April 30, 2015

DATE



CBU

100 WATER STREET
HARTFORD, CT 06103
TEL: 860-526-1234

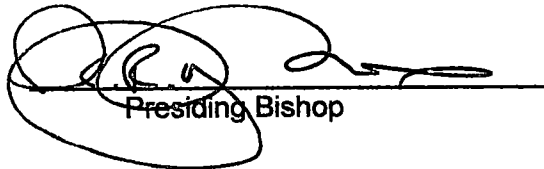
*The Restoration Fellowship of Christian Churches and
Ministers, International*


Myrtle Beach, South Carolina, United States of America

Certificate of Ordination

This is to Certify that Robert Tray Taylor has been fully ordained to the work of the Gospel Ministry and is hereby duly authorized to serve the sacrament, baptize, perform the matrimonial rites, bury the dead, and all other duties as a Minister of the Gospel. His gifts and calling of God have qualified him for this Certificate which is effective as long as he maintains a Godly life and is in the active Ministry, in accordance with the general practices of The Restoration Fellowship of Christian Churches and Ministers, International, an outreach of Cathedral Bible College/ Cathedral Church, with its headquarters at Myrtle Beach, South Carolina, U.S.A.

Given this 28th day of February, 2008


Presiding Bishop


International Secretary

"Neglect not the gift that is in thee, which was given thee by prophecy, with the laying on of the hands of the Presbytery."
1 Timothy :1:14

This certificate is valid only when accompanied by a dated fellowship card from The Restoration Fellowship of Christian Churches and Ministers, International

ALERTNESS • ATTENTIVENESS • AVAILABILITY • BENEVOLENCE • BOLDNESS • CAUTIOUSNESS • COMPASSION • HONOR • HOSPITALITY • HUMILITY • INITIATIVE • JOYFULNESS • JUSTICE • LOYALTY • MEEKNESS

FLEXIBILITY • FORGIVENESS • GENEROSITY • GENTLENESS • GRATEFULNESS • THRIFTINESS • TOLERANCE • TRUTHFULNESS • VIRTUE • WISDOM

CONTENTMENT • CREATIVITY • DECISIVENESS • DEFERENCE • DEPENDABILITY • OBEDIENCE • ORDERLINESS • PATIENCE • PERSUASIVENESS • PUNCTUALITY

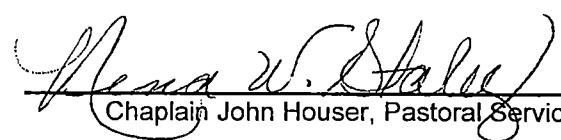
South Carolina Department of Corrections Character Club

Recognizes
Robert Taylor

For exhibiting the character quality of
Faith/Initiative

By
Kirkland R&E: Providing volunteer service while serving as secretary for Christ Church
International Praise Team Leader during the past 2 years.

Date November 25, 2013


Chaplain John Houser, Pastoral Services


Warden Bernard Mckie

THOROUGHNESS • SINCERITY • SENSITIVITY • SELF-CONTROL • SECURITY • RESPONSIBILITY • RESOURCEFULNESS • FAITH • ENTHUSIASM • ENDURANCE • DISCRETION • DISCERNMENT • DILIGENCE • DETERMINATION

ALERTNESS • ATTENTIVENESS • AVAILABILITY • BENEVOLENCE • BOLDNESS • CAUTIOUSNESS • COMPASSION
HONOR • HOSPITALITY • HUMILITY • INITIATIVE • JOYFULNESS • JUSTICE • LOYALTY • MEEKNESS

GRATEFULNESS • GENTLENESS • GENTLENESS • GENTLENESS • GENTLENESS
GENEROUSITY • GENEROSITY • GENEROSITY • GENEROSITY • GENEROSITY
TRUTHFULNESS • TRUTHFULNESS • TRUTHFULNESS • TRUTHFULNESS • TRUTHFULNESS
VIRTUE • VIRTUE • VIRTUE • VIRTUE • VIRTUE
WISDOM

CONTENTMENT • CREATIVITY • DECISIVENESS • DEFERENCE • DEPENDABILITY
OBEDIENCE • ORDERLINESS • PATIENCE • PERSUASIVENESS • PUNCTUALITY

South Carolina Department of Corrections Character Club

Recognizes

Robert Taylor

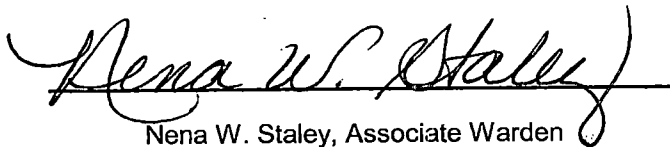
For exhibiting the character quality of

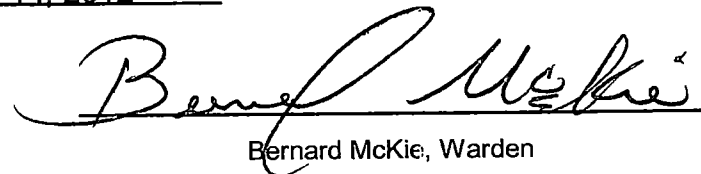
Hospitality

By

Kirkland R&E for rendering services in song as part of the Praise Team during
Mayor Steve Benjamin's visit at KCI.

Date March 14, 2012


Nena W. Staley, Associate Warden


Bernard McKie, Warden

THRIFTINESS • THOROUGHNESS • SINCERITY • SENSITIVITY • SELF-CONTROL • SECURITY • RESPONSIBILITY • RESOURCEFULNESS
FLEXIBILITY • FORGIVENESS • TOLERANCE • ENDURANCE • DISCRETION • DISCERNMENT • DILIGENCE • DETERMINATION
FAITH • ENTHUSIASM

PERRY CORRECTIONAL
CHARACTER-BASED UNIT



CHARACTER BASED
REHABILITATION UNIT

THIS CERTIFICATE IS AWARDED TO

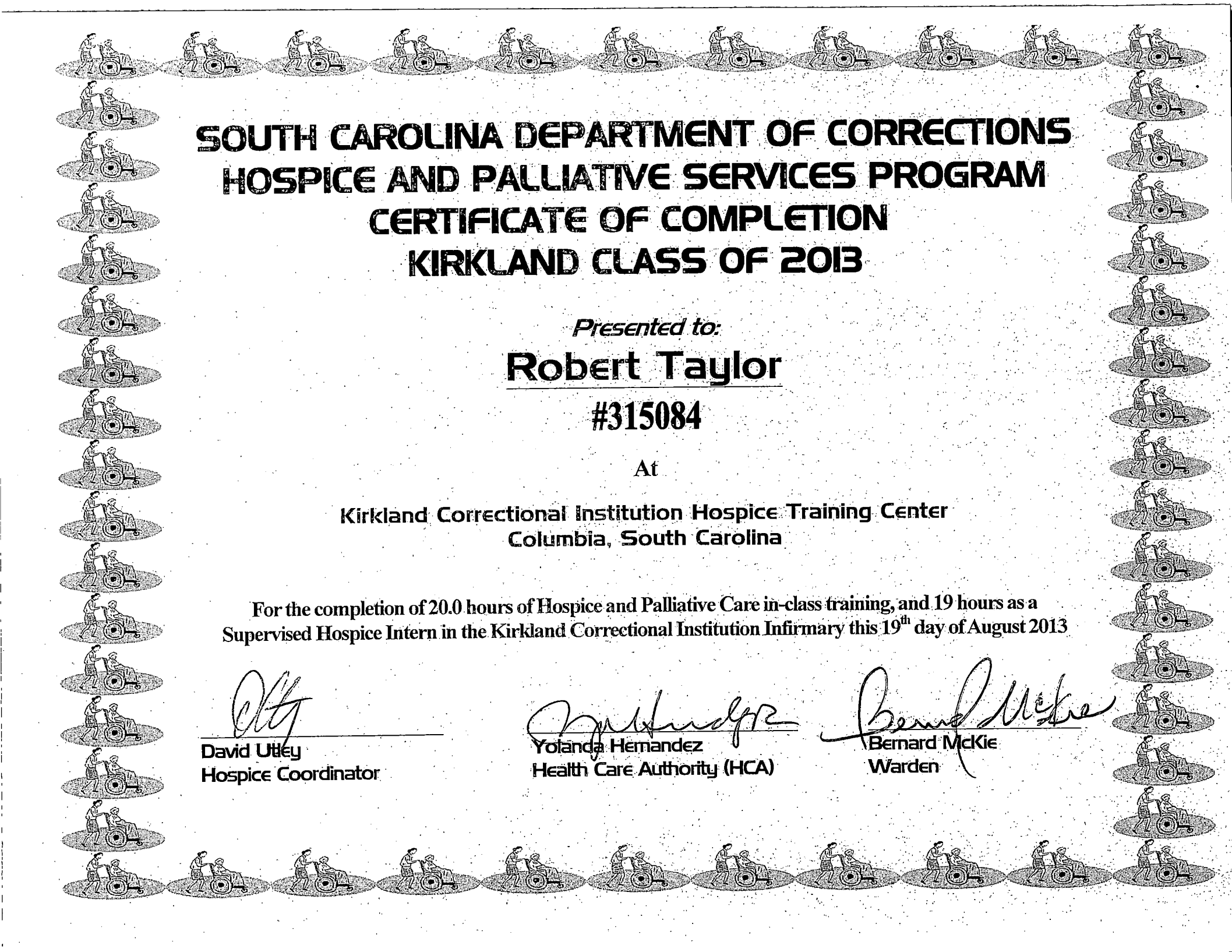
Troy Taylor

HONORARIUM OF THE MONTH

Class of the Month

10-16-15

DATE



**SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
HOSPICE AND PALLIATIVE SERVICES PROGRAM
CERTIFICATE OF COMPLETION
KIRKLAND CLASS OF 2013**

Presented to:

Robert Taylor

#315084

At

**Kirkland Correctional Institution Hospice Training Center
Columbia, South Carolina**


For the completion of 20.0 hours of Hospice and Palliative Care in-class training, and 19 hours as a Supervised Hospice Intern in the Kirkland Correctional Institution Infirmary this 19th day of August 2013



David Utley
Hospice Coordinator



Yolanda Hernandez
Health Care Authority (HCA)



Bernard McKie
Warden



CERTIFICATE OF COMPLETION

Presented to

Troy Taylor

for Men's Fraternity

"Quest for Authentic Manhood"

Presented November 2013 by

Men's Fraternity Facilitator

Men's Fraternity Facilitator

B.L.I.C.

South Carolina Department of Corrections
Lee Correctional Institution
BETTER LIVING INCENTIVE COMMUNITY

CERTIFICATE OF PARTICIPATION

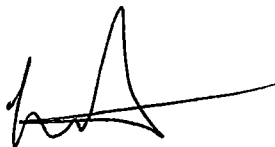
This certificate is awarded to

TAYLOR, TROY 315084

For participating in the following BLIC Programs:

AUGUST 2013 — AUGUST 2014

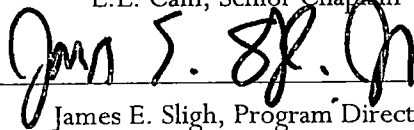
~ CHARACTER FIRST ~ BEE KEEPING ~ GUITAR ~



L.L. Cain, Senior Chaplain

9/4/14

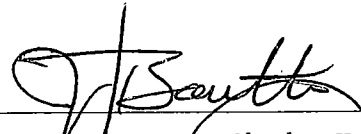
Date



James E. Sligh, Program Director

9/8/14

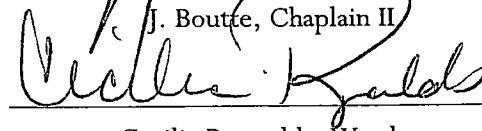
Date



J. Boutte, Chaplain II

9-16-14

Date



Cecilia Reynolds, Warden

9-8-14

Date



PRISON
FELLOWSHIP
Ministries

In recognition of participation in the seminar,

The Boy in the Stripped Pajamas

TONY TAYLOR

a child of God is hereby awarded this

Certificate of Participation

on this 21st day of December, 2009

For all that is in the world, the lust of the flesh and
the lust of the eyes and the boastful pride of life, is
not from the Father, but is from the world.

1 John 2:16

Jimmy Stewart
Jimmy Stewart

D A Van Beber
Chaplain

To the Esteemed Members of the SC Supreme Court:

I am writing to you today on behalf of Robert Troy Taylor, a prisoner housed in the SCDC. My name is Nick Everett and I am a 9th grade English teacher and football coach at Lamar High School, located in Lamar, SC. I am also a longtime friend of Mr. Taylor.

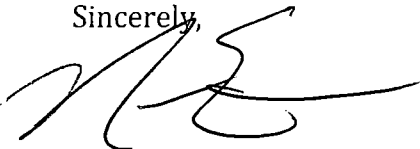
I have known Mr. Taylor since I was 15 years old, a friendship that now spans more than 17 years. Mr. Taylor was my pastor at Low Country Community Church in Murrells Inlet, SC. However, he was more than just my pastor: he was also my friend. He took me on my first overseas mission trip and helped me grow exponentially in my walk with Christ. I consider Mr. Taylor to be a mentor and one of the most influential people in my life.

I became involved in Mr. Taylor's case recently during his PCR hearing. I testified on his behalf about the events that took place on the night that he allegedly committed his crime. His defense attorney never contacted me before or during his original trial. If I had been contacted, I would have testified on his behalf then and believe this conviction would have never happened.

Once Mr. Taylor is released, I will continue my friendship with him and give him any support I can. I know that he can help me grow in my continuing walk with Christ and mentor me through many of life's greatest journeys. I look forward to the day when I can again share a meal with Mr. Taylor. I look forward to the day when he can preside over my wedding. I look forward to the day that he can start another church and I will walk right beside him every step of the way.

I know how important your decision is and I don't take that lightly. I just ask that you make the best decision possible, given the facts that you have been presented and that Mr. Taylor be released in the interest of justice.

Sincerely,



Nick Everett

May 16, 2016

To: Law Offices of Tricia A. Blanchette
P.O. Box 12725
Columbia, SC 29211

From: Volunteer Chaplain Faraja Greene
P.O. Box 31021
Charleston, SC 29417

Re: Letter of Recommendation for Parole for Troy Taylor #15084 SCDC

Dear Ms. Blanchette,

Thank you for all the initial work you ^{have} done so far in Mr. Taylor's case. Please receive this letter of recommendation on behalf of him.

In Mr. Taylor's and my almost ten year relationship as student-teacher, Mr. Taylor has manifested himself as a wholesome model inmate. In the four years of Bible Study Class, he has been faithful, diligent, and committed throughout the entire period with his presence and participation. Spiritually, he continues to grow in passion for Jesus and compassion for others with a heart to serve.

My SCDC Volunteer Chaplain status at Lieber Correctional Institution in Ridgeville, SC allows me the opportunity to participate in the Prison Initiative Program of Columbia International University (CIU) program. Consequently, this enables me to follow up with pastoral visits, and to observe Troy's continual development. He was chosen for the CIU program and has received his Associate of Arts Degree. He was sent out to other correctional institutions with a mandate to minister to other inmates at the Lee and Perry Correctional Institutions. Presently, he, along with thirty one CIU men, are working while training in a SCDC suicide intervention program at Broad River Correctional Institution. In all of these movements and places, I have visited and kept up with his progress. In conversation with Troy, one will soon learn that he is a loving concerned father and son.

One of the guiding principles in Troy's life is that he must use all the talents and skills that God has bountifully bestowed upon him. One example is that he is a musician (vocal, guitar, piano), and he shares these skills every chance given to him, and it is a blessing to other inmates.

With great appreciation for any and all consideration granted to Troy's case, and with God's blessing abundantly be upon you for it.

Sincerely,


Chaplain Faraja Greene

April 6, 2016

Honorable Justices of the South Carolina Supreme Court:

My name is Linda Taylor, mother of Robert Troy Taylor. Troy is the fourth child of five my husband and I were blessed to parent. Our family now consist of ten grandchildren of which three are Troy's. He fathered one son and one daughter and adopted one son from Romania, Marius. Marius served four years in U.S. Marines, is now married and father of a baby girl. Marius is only one of several people who Troy has been a huge impact in helping shape their lives. This is Troy's DNA, helping others. We have visited Troy weekly for six years, then bi monthly another three years and monthly this last year of his incarceration. Our visits diminished because of his father's diminishing health. We have meet many inmates over these ten years who told us what a positive influence Troy has been in their daily lives behind bars. Troy's faith has never faltered, his joy never left him, his desire to help others has remained and ministering to others has been his goal over these ten years. This is who Troy Taylor is.

Our family all live locally and are very close. Everyone knows if they need help in anyway someone or all will be there. We enjoy weekly meals together, beach outings and share vacation time often. We worship together often and are all involved in serving others in our community.

When Troy comes home, he will again get to spend time with his sick father. He can begin to put his life back together with his fiance and hopefully reunite with his children. Troy is very ambitious, always has been. He will succeed because he believes in people and has a positive outlook. He was a productive citizen before incarceration and will be as a free man. He has many goals to accomplish and our state will be a better place as he begins this new life.

I am asking you to extend grace by agreeing to issue an appellate bond to Troy. Our family has lost so much these ten years.

Thank you so much for your attention and time.

Linda Taylor

A handwritten signature in cursive script that reads "Linda Taylor". The signature is written in black ink and is positioned below the typed name.

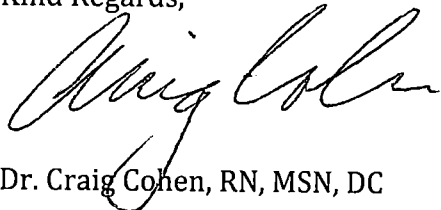
To Whom It May Concern,

This letter is in reference to Troy Taylor. I first met Mr. Taylor at Low Country Community Church where he was the pastor. I attended the church when visiting my parents while in college. I was always impressed with his sincere and passionate sermons. My parents developed a special bond with his family over the course of several years. Over this period of time I witnessed Mr. Taylor provide many contributions to the community. He organized charity fundraisers, outreach programs, and sponsorship programs to help those in need. He helped improve the lives of countless people throughout the community. He had a tenacious spirit to serve, and this was evident throughout his community service projects he provided.

It is my opinion that Mr. Taylor would have a positive impact on the community once he is released. I think he will use his experiences to help other people overcome adversity. I think his past experiences will help him empathize with others in need. I believe he will use his past experiences to encourage others to make good decisions.

I would help assist Mr. Taylor in adjusting to a new life by encouraging him. I would be willing to be his accountability partner when facing challenges that his new life could present. I would be willing to walk with him step by step through any opposition he might face. I believe in him and the good he can create.

Kind Regards,

A handwritten signature in black ink, appearing to read "Craig Cohen". The signature is fluid and cursive, with a large initial "C" and "C" for "Cohen".

Dr. Craig Cohen, RN, MSN, DC

April 7, 2016

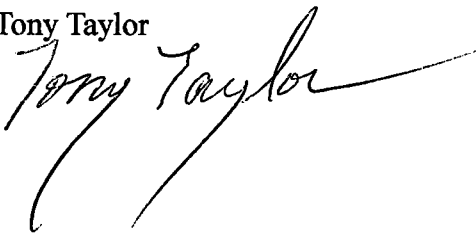
South Carolina Supreme Court:

My name is Tony Taylor and I am the proud father of Robert Troy Taylor. One of many reasons I know Troy will be successful as a free man is in 1998 he came to Murrells Inlet as a 29 year old youth pastor to take on the challenge of lead pastor. This congregation had shrunk to 25 and within 5 years grew under Troy's leadership to 800. Many members of his congregation and community still support Troy with letters and cards and look forward with anticipation to his freedom. Another reason Troy will succeed is he has prepared himself by earning a degree in Divinity from North Greenville College and an associates degree from Columbia International University's Prison Program. He has used knowledge from these studies during his 10 years of incarceration to help other inmates to find purpose for their lives and to be better citizens.

I long for the day when my son is free and we get to spend time together again. My health is fading fast and my biggest "bucket list" is time with him while I still have some quality of life. I will always have a listening ear for Troy, a caring heart, lots of encouragement and all the father-son time he desires. Our entire family has suffered so very much these years of incarceration. Troy's fiance and her family, children, daughter-in-law-, granddaughter, siblings, nieces, nephews, aunts, uncles and a lot of friends will all support him with love and affirmation.

Thank you with all my heart for time and consideration to granting my son an appellate bond.

Tony Taylor

A handwritten signature in cursive script that reads "Tony Taylor". The signature is written in black ink and is positioned below the typed name.

To Whom It May Concern:

My name is Robert Johnson #329585. I am serving a thirty year mandatory sentence for murder. I have known Troy for quiet a few years now and I can honestly say he is one of the best men I have ever known. From the first time I met Troy at Lee County Correctional Institute I could see something in him, and it wasn't long until I knew what it was that I saw in him, it was the Love of God.

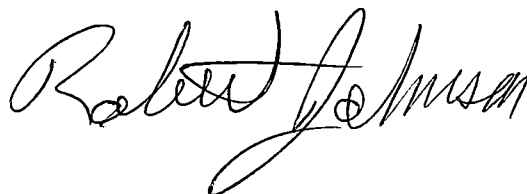
Prison life is completely different in so many ways; when you have your ups and downs on the street you have all kinds of friends and family to turn to for help, but in here not so much, but there are a few men in here that you can go to no matter what the situation maybe, and Troy Taylor is definitely one of those men. Don't get me wrong, this is not a Troy is God in the flesh, he as well as everyone is human and has flaws.

I want you to know that I am a Christian and have love for everyone, but I do struggle with people when it comes to hurt or exploiting children. My own father was arrested back in 1990 for lewd acts on a child and received a life sentence in NC. Believe me when I say this; if he was guilty then he deserved what he got and I feel the same way about any other person that would harm a child. I believe with all my heart that Troy Taylor would never harm or exploit a child in anyway. I believe Troy feels the same way I do about this subject. I do think he would help a child or anyone before he would harm them.

In the last five or six years that I have known Troy I have had the privilege to met his mom and dad on numerous occasions and I will say this they are the sweetest nicest people a person could ever meet and Troy is a reflection of his parents. No one will ever make me believe that Troy is guilty of a crime like this. I stand behind him 100% and will help in any way possible. Thank you for allowing me to have a say in this matter.

Respectfully,

Robert Johnson

A handwritten signature in cursive script that reads "Robert Johnson". The signature is written in black ink and is positioned below the typed name.

April 3, 2016

South Carolina Supreme Court,

My name is Nancy Ritchey, of Myrtle Beach, SC, and I am the fiancé of Robert Troy Taylor. I have known Troy, and his family, for 15 years as he was the Pastor of the church my family attended. Our families have endured this seemingly endless legal battle together and desire only for Troy to be home with us.

As a friend, I have watched Troy lose everything dear to him-His wife, children, church, business, and many who called themselves friends. Ironically enough, what he has never lost, or waived in, is his faith, passion, and ability to lead effectively, even in prison. Those attributes in themselves will allow Troy to be successful if granted bond.

Troy is formally educated with both a Bachelor of Arts degree and an Associate degree in Biblical Studies. In addition to being a Pastor, Troy was a successful business owner in Garden City, South Carolina. Both careers allowed Troy to build a large network of support in and around the Grand Strand area. Although he has been incarcerated for ten years, he has remained in close contact with many of these friends and acquaintances. Not only will these friends lend support, some are willing to employ Troy if he is released on bond.

One of mine and Troy's dearest friends is a Christian Counselor in Pawleys Island, SC. He has already offered his services to Troy, free of charge, for an indefinite period of time. He will help Troy process the last ten years and help him with challenges he may face upon reentering his community.

If he were to be released on bond, Troy and I would be married and would live together, with my children, at my residence in Myrtle Beach. I own the home at 1601 Deltura Drive, Myrtle Beach, SC, I am employed as a Registered Nurse, and attend Church weekly. Troy would be coming home to a stable environment without the stresses that many men in his situation would have to face.

On behalf of my family, we request that Troy be released on appellate bond.

Sincerely,

Nancy Ritchey

A handwritten signature in cursive script that reads "Nancy Ritchey". The signature is written in black ink and is positioned below the typed name.

Honorable Justices of the Supreme Court,

I'm writing on behalf of Robert Troy(Troy) Taylor. My husband John and I have been very good friends with Troy and the entire Taylor family for 16 years. As soon as they are able, our daughter Nancy Ritchey and Troy will be married. My husband and I are in complete agreement with this decision. Troy is a very principled, loyal and gentle man of much integrity. We know he will make a wonderful husband and father to our 3 grandchildren. We know this because we observed Troy as a loyal husband and devoted father to his former wife and their children.

Troy served as our pastor for 3 years prior to his incarceration. He is a godly man, who grew his church from a handful of members to about 700 in a very short time. Besides pastoring his people, he also was an active, working partner of a very successful business.

Troy has very close ties to his community. He and his immediate and extended family have lived in and around the Murrells Inlet area their entire lives. He is well loved in this community and will have much family and community support.

Several members of our family are involved with a local building supply company. They may be able to help him gain employment with this company. I hope you will take all of this into consideration when deciding whether or not to grant him bond. Thank you.

Sincerely yours,


Arlene Pezzullo

April 11, 2016

Honorable Justices of South Carolina Supreme Court:

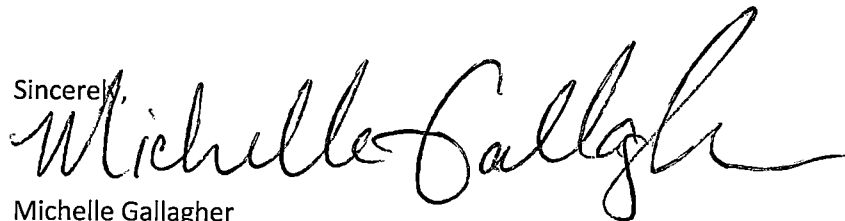
My name is Michelle Gallagher, and I am Troy Taylor's younger sister. Being only a few years apart, Troy and I have always been very close and he has always played an important role in my life, my protector. Our bond grew stronger as we became adults... living next door to each other as we raised our children together, highly involved in the church he pastored and frequent family dinners. We are so blessed to belong to such a loving, tight-knit family who supports each other and truly loves spending time together.

It has been 10 painfully long years since Troy's incarceration and there are no words that could describe the loss and emotional pain that we have all endured. But through it all, Troy is the one whose spirit could not be broken and whose faith has grown stronger. When most would have given up, Troy continued to use his God-given gifts of leadership and helping others while in prison. I have no doubt that Troy will be successful if he is released because if he can use his strengths inside the prison walls and through his legal battles, then those same strengths will help him flourish outside of prison.

Troy has been missed by so many family and friends, who eagerly await to embrace and support him. He will come home to an enormous support system. I, personally, will be there for Troy on a daily basis to help him get acclimated if he is released. I will be there for him when he needs a friend to listen, a shoulder to cry on, someone to bounce his entrepreneurial ideas off of and definitely someone he can be silly with and just laugh. I will offer Troy the emotional support that we have always given each other.

Since Troy has been in prison, his absence has left a huge void in all of our lives. We all look forward for his return, but no one would benefit more than my parents. My dad's health has had a significant decline and time is not on his side with his kidney disease. Please, your Honor, I ask that Troy be released on appellate bond.

Sincerely,

A handwritten signature in black ink that reads "Michelle Gallagher". The signature is written in a cursive, flowing style with a long, sweeping tail on the "h".

Michelle Gallagher

April 10, 2016

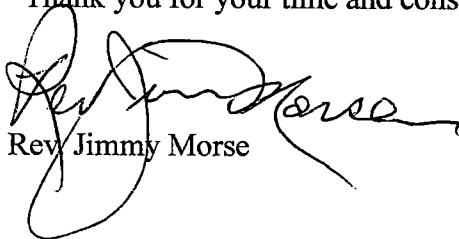
South Carolina Supreme Court:

My name is Rev. Jimmy Morse and I reside in Surfside Beach, South Carolina. Our ministry, Reach out for Christ has had many dimensions including pastoring, hosting ministry teams, family counseling, group home for young abandon girls as a pastor and missionary. Through it all we have had a special contact with Troy Taylor here in South Carolina and in Romania on the mission field. Troy's love and concern for people was always evident. His personal investment to help and encourage people was just a natural characteristic to who he is as an individual. Observing his unique sensitivity to the needs around him has made a difference in so many lives.

I am totally convinced that Troy will be an outstanding and positive influence to our community. My family and I will for sure be standing beside him offering encouragement and friendship.

I am asking you to grant Troy Taylor a bond so he can continue to minister to others with these acts of kindness I have been privileged to observe for so many years.

Thank you for your time and consideration to this very important request.



Rev Jimmy Morse

April 10, 2016

South Carolina Supreme Court:

My name is Peggy Morse and I live in Surfside Beach, South Carolina. My husband, Rev. Jimmy Morse, and I have been in ministry for many years. Many of these years were spent in Romania as missionaries.

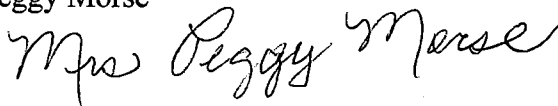
I first met Troy Taylor when he was 16 years old. He came and spoke and sang at our church here in the Myrtle Beach area. He shared with us that he had dedicated his life to God's work. He was so excited and passionate about serving his Lord. We have stayed in close contact with Troy and his family and were blessed to observe him mature into a young man. He blossomed in his love and service for the Lord. Troy went to North Greenville College to continue his preparation for the ministry. He married, had children and started a church and God blessed everything he touched. His church grew and began taking teams of workers to Romania where they joined us in many projects and ministry. Everything Troy did was always above reproach and honest. Troy's goals were always to help people and share the love of his Heavenly Father.

I believe Troy will be a very productive citizen as he has always been. Even in prison he has used his time to minister to and teach others. He has worked to assist the chaplains whenever he had opportunity.

Please consider giving this man his life back by granting him a bond. You will never regret it.

I want to thank you for your attention and time.

Peggy Morse

A handwritten signature in cursive script that reads "Mrs. Peggy Morse". The signature is written in dark ink and is positioned below the typed name.

Honorable Justices of the South Carolina Supreme Court,

It is difficult to put into words the loss my family has suffered at the incarceration of my brother, Troy. We are a very tight, loving family and we enjoy time together. There is, and has been for 10 years now, a very large gaping hole in our lives. When we gather for holidays, family traditions, and celebrations we miss our brother (son, uncle, nephew). Troy misses us tremendously. He celebrates with us from afar and wishes he could be there to see our faces, give us hugs and kisses. The celebrations are bittersweet without him, but the reality is that we miss him, pray for him, and long to be with him every single hour of every single day of every single year that he has been gone. It's almost as if our family was hi-jacked and sentenced as a unit. We carry on our daily lives but there is a large piece of us missing.

Troy has an adopted son, Marius, whom I finished raising after Troy was sent to prison. It was a terrible time for Marius. His father was sent to prison and his mother shunned him. We all pulled together to do the best we could to help him through it. Marius longs to introduce his little family to his dad. Troy has a daughter-in-law that he has never met, Ingrid. He did not get to stand up with Marius as best man at his wedding 3 years ago. Troy now has a granddaughter that he has never met. Catherine Lucia has never been rocked to sleep or sung a lullaby by her grandfather. I pray that soon they will meet and can be a family.

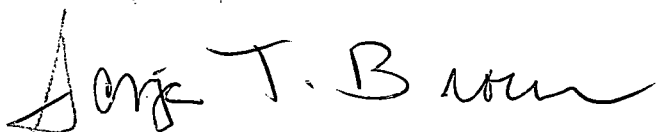
Troy's long incarceration has been hardest on my parents. It is so difficult to witness your parent's struggles. My parents were strong, healthy, faithful leaders of our family when Troy was sent to prison. My father is now weak, sick, and just plain tired. My mother tries to stay strong for him but she is dealing with her own medical issues. Troy left strong vibrant parents. When he comes home, he will find worn down, weak parents who need him more now than ever. This separation has cost them what little wealth they had as well as their health. They incur expenses in the hundreds of dollars for every visit they make to Troy in prison. There is the gas, hotel room, and food. My parents are not wealthy; they barely survive on social security. But, every dime they get goes to Troy's defense, upkeep, and visits. In a sense, the golden years of retirement have been stripped from them. They will now be forever dependent on their children which is okay with us, but not what they ever imagined for themselves.

Troy has 2 great-nieces that he has never met. He has 8 nieces and nephews who were children when he left and have grown into young adults while he was away. They long to re-connect with the uncle they lost. There are many who are waiting to re-connect with their long lost friend. Uncles and aunts and cousins who want to welcome him back.

Me, I long to hold my brother and comfort him and help him put his life back together. I want to sit on the back porch with a glass of sweet tea and argue over politics and religion. I want to play cards while we reminisce about our childhood and listen to his endless jokes and stories. I want to walk on the beach and talk about our dreams and hopes for the future. I want to hold family celebrations and finally have the entire family together. Holidays, celebrations and family traditions are great fun and very important to our family. But, for me, it is the everyday living that is most important. I want to go to bed at night knowing my brother is safe and comfortable and with the ones he loves most. I want my parents to be able to relax and enjoy their remaining years knowing the family is back together and everyone is good and taken care of.

Please, send Troy home to his loving family while the lawyers work through this long process. We need him and he needs us. We are a large group that will support Troy and help him acclimate to life outside of prison. We will pull together to support him financially until he is able to find a job. I will personally help him find a job and a place to live. Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Sonja T. Brown". The signature is written in a cursive, flowing style.

Sonja Taylor Brown

Larry E. Tyree
193 King George Street
Charleston, South Carolina 29492-8139
(843) 216-8233

April 14, 2016

Ms. Tricia Blanchette, Attorney at Law
Post Office Box 12725
Columbia, South Carolina 29211

Subject: Robert Troy Taylor

Dear Ms. Blanchette

My name is Larry Tyree. I've been a Volunteer with the SCDC for the last nine years. Within the last four of these years, the location where I serve (Lieber Correctional Institute) advanced me to the position of Volunteer Chaplain. It was in my first years as a Lieber CI Volunteer that I came to meet and know Troy Taylor.

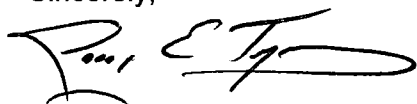
My first meeting with Troy began during the Prison Fellowship Ministries-Monday Night Bible Study (PFM-MNBS) in the Lieber CI Chapel. Upon entering the chapel that night, all of the Brothers-in-chains (B.I.C.) were lined up for the 'count'. It turned out that I was seated at a table with Troy and another B.I.C friend of his. Our friendship began as a result of that meeting and continues to this day. I consider him a good friend.

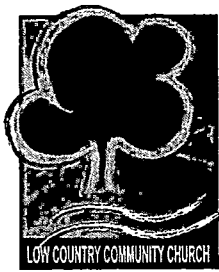
It is unlikely that I'll ever be able to convey (in one short letter) my 'work' transformation, which took place in that meeting. Within two hours, these men had completely refocused my volunteering experience. Together these men graciously taught me the capacity to understand how to serve the needs of those incarcerated. Over the years, I've learned to love the men at Lieber CI because I understood now that I felt called to. They are men created by God worthy of redemption. Is there anyone that is not?

Building upon the principles Troy taught me that night, I have done all that is within my ability to be the true 'friend' these men would hope to have in their time behind the fence. Troy's concern, assistance and mentoring me in my season, as a Volunteer Chaplain, have been irreplaceable and monumental.

My immediate goal for Troy (upon his being released) is to return the gracious favor he extended to me by helping him re-acclimate to live outside of prison. It is my hope to assist Troy in revitalizing his personal gift of compassion and his unique ability to instill vision to those uncertain on how to proceed with life's challenges that are outside of prison. He is incredibly skilled at assisting those 'within the fence.' The transition should be comparatively easy. My attainable goal is to be the person he can call at any hour on any given day who will drop everything to assist him in any hour of need. My visionary goal is to encourage him to forget what's behind and to now focus on what can be limitless in his ability to make this world a better place.

Sincerely,





Low Country Community Church
"Changing the world, one block at a time"

April 12, 2016

To the Honorable Justices of the South Carolina Supreme Court,

I am writing you this letter on behalf of Robert Troy Taylor. I have known Mr. Taylor (Troy) since 1998. My family and I had just moved into the area and he welcomed us into the community. We attended the church he pastored and quickly became involved in that church. He was an excellent pastor with a servant's heart. He cared deeply for the congregation and was always ready to drop what he was doing if we needed help with something. Troy was the man that led me to Christ. And, as a result, I am now the senior pastor of our church.

I have visited Troy many times during his incarceration and, also, many other inmates that are a part of the CIU program in Kirkland. I have witnessed Troy's leadership skills at work with the inmates and since his departure from there, the inmates that remain still have many praises for Troy and his leadership skills.

I think Troy will succeed in life if he is released on bond because of his natural ability to lead. He is a very passionate person who is on fire for God and has a strong desire to help those that are in need of Christ.

The Bible says, "As iron sharpens iron, so one man sharpens another." (Proverbs 27:17) Like Troy was to me prior to his incarceration, I would like to be a mentor to him and meet with him weekly to give him encouragement, guidance, correction, and love.

Thank you for your time.

God Bless you!

Steve Fairchild
Senior Pastor

PRO-REPS, LLC

1413 Highway 17 South

Surfside Beach, SC 29575

April 12, 2016

Honorable Justices of the South Carolina Supreme Court:

My name is Rick Hicks and I have known Troy Taylor for 6 years. I am the owner of a small marketing company, Pro-Reps. Troy is a friend and someone that I trust. When Troy is released on bond, he can certainly work in any capacity he wishes for Pro-Reps. I will proudly hire him.

Troy has an incredible support group and will be given the tools to allow him once again be a valuable part of our community and of our lives. Granting this opportunity to Troy will not be a mistake nor will it be a decision that you regret.

Best regards,

A handwritten signature in black ink, appearing to read 'Rick Hicks', with a long horizontal flourish extending to the right.

Rick Hicks, Pro-Reps LLC

April, 18, 2016

Honorable Justices and all concerned parties:

I am writing in order to speak to the character of Mr. Robert Troy Taylor. Let me start by saying Troy is a loyal and trustworthy man of God and fellow servant in the cause for Christ, and I consider myself privileged to have had the opportunity to get to know him over the last few years. I am not only proud to call him my brother in Christ, but I am honored to call him my friend. I am truly a better person for having had him pour into my life.

This society behind prison walls is one that usually breeds cynicism and anger, and just general negativity. Because this is the case it can be real easy for even a positive person to develop this common attitude. I say all that to say this; I have stood beside Troy Taylor and watched him go through the ups and downs of prison life, the wins and losses while battling the court system, the pains of being separated from his children and loved ones, and the hurt of rejection by his peers and people he genuinely cares for. Through it all Troy has maintained an attitude of positivity and indifference that is surpassed by none. He truly lives his life with the kind of integrity that we should all desire to have.

If there is any justice to be served Troy Taylor will be vindicated and be allowed to once again be a contributing member of society. He has so much to offer this world and it is a tragedy of gigantic proportions that he is bound behind these prison walls. Please set my brother at liberty.

Sincerely,

Eric Bruce Anderson



If it means anything to whom it may concern I believe that Robert Troy Taylor deserves a chance for an appeal bond. Please consider giving him a second chance and allow him that. I praise my Lord & Savior for allowing me to see Robert Troy Taylor and him always pushing me to see the best in myself and putting his own interests to the side tells me a lot about a man who is anointed by God and deserves another chance. Please consider these words and let them help you in making your decision. Thank you for your time and God bless you.

"THE ANCHOR HOLDS,"

Allen Short

Joshua 1:1-9

Hebrews 13:1-4

April 16, 2016

ALLEN WILLIAM SHORT #339316

4460 BROAD RIVER RD.

B.H.C.I. GREENWOOD UNIT B-2085

COLUMBIA, S.C. 29210

South Carolina Supreme Court

Re: Robert Troy Taylor

To whom it may concern:

Since my incarceration in February 2010 I have encountered a lot of men in S.C.D.C. There are those who are manipulative, bullies, and then you meet men like Robert or as his friends call him Troy Taylor. Once I got out of R&E I had a very hard time transitioning to prison life; this is my first time being in prison so I had no idea what to expect.

I arrived at my first institution; Lee Correctional. Being a white male at the age of 25 with 23 years to serve 85% is not fun. I was absolutely scared to death. I met a man named Troy Taylor. He has been an ever present help in a time in my life when it seemed all my hope was gone. The Lord allowed me to meet Troy and he showed me that there is hope and that hope is that God still loves me.

Troy is a very encouraging and loving person who always shows others that there is still hope and that the Lord is not done with them. I thank God for Him putting Troy Taylor in my life to always show me that there is a better way and to always find a positive in any circumstance that you are faced with.

To the Supreme Court of South Carolina,

This letter is in regards to my relationship with Robert Troy Taylor, and my knowledge of his character. I have known Troy Taylor for four years. We met when we first attended Columbia International University. I have witnessed Troy be a mentor, father-figure, pastor, teacher, and a friend to many. He has had a great impact on my life. He has helped my relationship with God in many different ways. When we graduated Columbia International University, I got the pleasure to spend two more years with him at Perry Correctional Institution. There I witnessed him carry the same zeal and love for Christ and others that he had while at Columbia International University. I praise God for the influence he has had in my life and I also praise God for all the lives that have been changed due to Troy's relationship with Jesus Christ and his willingness and diligence to serve others.

In all sincerity,

Reginald A. Rice III # 345326

APRIL 18, 2016

WILLIAM L. HICKMAN # 293942

4460 BROAD RIVER RD

BRCI GREENWOOD UNIT B. 2099

COLUMBIA SC 29210

SOUTH CAROLINA SUPREME COURT

RE: TROY TAYLOR AND REPRESENTATIVES

DEAR SIR AND/OR MADAM

I VE KNOWN TROY SINCE 2012. WE BOTH ARE GRADUATES OF COLUMBIA INTERNATIONAL UNIVERSITY (C.I.U.) THROUGH A TWO YEAR ASSOCIATES OF ARTS INITIATIVE PROGRAM AT KIRKLAND CORRECTIONAL INSTITUTION. DURING OUR TIME THERE WE BECAME GOOD FRIENDS THOUGH WE HAD ABSOLUTELY NOTHING IN COMMON BUT OUR FAITH AND LOVE FOR JESUS CHRIST; INDEED A TESTAMENT TO THE LOVE AND POWER OF CHRIST THAT BREAKS DOWN EVERY DIVIDING WALL AND BARRIER TO THE GLORY OF GOD THE FATHER.

I GRADUATED AT THE END OF 2012, A YEAR BEFORE HE DID AND WAS ASSIGNED TO PERRY

CORRECTIONAL INSTITUTION IN PELZER, SOUTH CAROLINA.

IN SEPT. OF 2014 HE TOO WAS TRANSFERRED TO PERRY WHERE WE BOTH WORKED IN THE CHAPLAINS OFFICE AND SERVED THE MEN THERE IN VARIOUS WAYS, LIKE HELPING ORGANIZE AND CONDUCT PROTESTANT WORSHIP SERVICES AND TEACHING DISCIPLESHIP CLASSES.

THIS ~~IS~~^{IS} TROY DAY IN AND DAY OUT. HE LIVES FOR OTHERS. HE GENUINELY CARES FOR PEOPLE AND DOES WHAT EVER IS IN HIS POWER TO HELP THEM.

THIS IS WHO HE IS. HE EVEN TAUGHT CLASSES LIKE VICTORY OVER GRIEF AND MUSIC THEORY IN THE CHARACTER-BASED UNIT WHERE WE BOTH WERE HOUSED. WE BOTH SIGNED UP FOR THIS NEW PROGRAM HERE AT BROAD RIVER WHERE WE PROVIDE CONSTANT OBSERVATION FOR MEN IN CRISES WHO MAY HAVE DEMONSTRATED A PATTERN OF SELF-INJURIOUS BEHAVIOR AS THEY GO THROUGH THE PROCESS OF ASSESSMENT EVALUATION AND TREATMENT.

I AM FAMILIAR WITH THE FACTS SURROUNDING TROY'S CASE. AND IN TERMS OF EVIDENCE, I OFFER NOTHING NEW THAT RIGHTLY SPEAKS TO HIS INNOCENCE. HOWEVER, I DO BELIEVE THAT HE IS AND I CAN SAY THAT TROY HAS ALWAYS MAINTAINED AND EVEN INSISTED ON HIS INNOCENCE

SINCE THE VERY FIRST DAY I MET HIM, I CAN,
HOWEVER SPEAK TO THE CHARACTER OF THE MAN
I HAVE COME TO KNOW NOT ONLY AS A DEAR
FRIEND BUT A SOURCE OF GREAT ENCOURAGE-
MENT AND SUPPORT IN MY OWN LIFE AND
WALK WITH THE LORD. I'M PRAYING FOR
TROY'S VINDICATION AND ~~THE~~ ^{REQUESTING} THE COURT
TO GRANT ~~THE~~ HIM AN APPELLATE
BOND AS THEY RECONSIDER AND REVIEW ~~THE~~
HIS CASE AND SENTENCE.

THANK YOU FOR YOUR CONSIDERATION
RESPECTFULLY SUBMITTED,

WILLIAM L. HICKMAN

X *William L. Hickman*

April 12, 2016

J. Wesley McCoy, #299995

Broad River C. I., Gravel 2080

4460 Broad River Rd.

Columbia, SC 29210

U.S. Supreme Court

RE: Troy Taylor

Dear Sir or Madam,

I am writing to you in order to give the highest recommendation for Mr. Troy Taylor who currently has a case before you.

I have known Mr. Taylor for approximately nine years. We have been housed together as roommates for about one year during that time. We currently serve as one of thirty inmates who have been hand selected to work in an ~~innovative~~ innovative approach to incarcerated men who are in crisis (i.e. attempting to harm themselves, or to take their own lives) in the South Carolina Dept. of Corrections, Crisis Stabilization Unit, Broad River correctional facility.

During the time I have known Mr. Taylor, I have witnessed nothing but outstanding character and service to others. During the twelve years

of my own incarceration, Mr. Taylor is one of only two people I have met that I believe are innocent of the crime of which they were accused.

The greatest danger of the justice system is not the failure to punish one who is guilty of a crime but rather the unjust punishment of one who is innocent of any crime.

I recommend Mr. Taylor be considered for an appellate bond and that this court accept the witnesses' testimony who have come forward to confirm before the court that he is indeed innocent of the crimes of which he was accused.

Thank you for your consideration.

Sincerely,

Wesley McLoay
J. Wesley McLoay

I support Robert Troy Taylor being given the opportunity to receive an appellate bond:

NAME	ADDRESS	SIGNATURE
Rachel Dennis	4 Ironcrest Ct Columbia SC 29212	Rachel F. Dennis
Joseph Wells	373 Smallwood Rd Ridgewood SC	Joseph Wells
Isaac Hagenbuch	305 Flora Dr Columbia 29223	Isaac Hagenbuch
Brad Carnahan	173 Mason Ridge Circle 29229	Brad Carnahan
Kim Coleman	907 Arcadia Lakes Dr 29206	Kim Coleman
Matt Coleman	907 Arcadia Lakes Dr. 29206	Matt Coleman
Isaac Iverson	4608 Arcadia Rd. 29206	Isaac Iverson
Gilroy Horn	9351 US Hwy 321 S Blythewood	Gilroy Horn
Rachelle Hagenbuch	305 Flora Dr. Columbia, SC 29223	Rachelle Hagenbuch
Amanda Wells	373 Smallwood Rd Ridgewood SC 29130	Amanda Wells
Oppe Johnson	46 Westpine Ct Columbia, SC 29217	Oppe Johnson
Carmon Iverson	4608 Arcadia Rd, Columbia SC	Carmon Iverson
Christopher Johnson	46 Westpine Ct. Columbia SC 29217	Christopher Johnson
Dale E. Garrett	106 Blackstone Dr. Irmo SC 29063	Dale E. Garrett
Diane S. Garrett	106 Blackstone Dr. Irmo, SC 29063	Diane S. Garrett
Madison A Garrett	106 Blackstone Dr. Irmo, SC 29063	Madison Garrett
Susan W. Wells	349 Saluda Springs Rd. Lexington SC 29072	Susan W. Wells
Jean Moore	244 Cirrus Lane, Gilbert, SC	Jean Moore
Barbara Thompson	131 Volley Ct. Lex. SC	Barbara Thompson
Kathryn Epps	315 Loblolly Rd. Gilbert, SC	Kathryn Epps
Kate Barrett	358 Whiteford Way Lexington SC	Kate Barrett
Mike Moore	244 Cirrus Lane, Gilbert, SC	Mike Moore
Ann Clardy	305 Bridlewood Dr. Lexington SC	Ann Clardy
Pat W. Rottins	141 Driftwood Dr. Lex, SC	Pat Rottins
Dan Williams	305 Cony Hill, Lexington SC.	Dan Williams
Debbie Smith	105 Learning Pine Ct Lex SC	Debbie Smith
Thomas Dennis	4 Ironcrest Court, Columbia, SC 29212	Thomas Dennis
Mary Diggins	1933 York Dr Columbia, SC 29204	Mary Diggins
Gary Wells	349 Saluda Springs Rd. Lexington, SC 29072	Gary Wells

I support Robert Troy Taylor being given the opportunity to receive an appellate bond:

NAME	ADDRESS	SIGNATURE
Andrew Morton	3238 Plattmoor Dr Myrtle Beach SC 29588	Andrew C. Morton
Tiffany Schumel	393 Winslow Ave Myrtle Beach SC 29588	Tiffany Schumel
Joseph Schumel	320 16th Av S. Surfside Beach	Joseph Schumel
Reggie Morse	1392 Southwood Drive MB SC 29575	Reggie Morse
Rob James D Morse	1392 Southwood Dr. MB SC 29575	Rob James D Morse
Roberta Todd	11 Sandy Pine Dr., MB, SC 29575	Roberta Todd
Jessica	218 Woodcock Blvd Summerville SC 29483	Jessica
James R Todd	11 Sandy Pine Dr. M.B., SC 29575	James R Todd
Rebecca Carreiro	126 Misty Pine Dr. MB 29575	B. Carreiro
Sydney Brown	126 Misty Pine Dr. MB, SC 29575	Sydney Brown
Mary Martin	7704 Enterprise Rd MB 29588	Mary Martin
Hoyt Martin	7704 Enterprise Rd Lot 4 M.B. 29588	Hoyt Martin
Donald Lockler	7704 Enterprise Rd Lot 7 MB SC 29588	Donald Lockler
Laura M. McKiff	7704 Enterprise Rd Lot 7 MB SC 29588	Laura McKiff
Emmal Santos	7704 Enterprise Rd Lot 12 MB SC 29588	Emmal Santos
Ramiro S Hernandez	7704 Enterprise Rd Lot 13 MB SC 29588	Ramiro S. Hernandez
Renew Angel	10577 Freedom Rd M.B.	Renew Angel
Sharon Cannon	1620 Seagreen Dr. M.B.	Sharon Cannon
Chuck Wells	9870 M. Donald Street Rd, MI	Chuck Wells
Charlie Wells	9850 M. Donald Street Rd, MI	Charlie Wells
Ornel Jones	5583 Daybreak Rd, MI	Ornel Jones
Bill Jones	5583 Daybreak Rd, MI	Bill Jones
Michael Padgett	5583 Daybreak Rd, MI	Michael Padgett
Melodie Sanders	5872 Crestwood Dr, MB	Melodie Sanders
Lawrence Knox	6351 Knox Ln, M.B. 29588	Lawrence Knox
Mary Knox	6351 Knox Ln, M.B. 29588	Mary Knox
Connie Knox	6351 Knox Ln, M.B. 29588	Connie Knox
Laura		
Connie		
Mary		

