

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari To Lexington County
Court of Common Pleas

Honorable Edgar W. Dickson, Circuit Court Judge

ALAN BRUCE CARRUTHERS,

PETITIONER,

V.

STATE OF SOUTH CAROLINA,

RESPONDENT.

APPELLATE CASE NO. 2016-000685

PETITIONER'S PRO SE MEMORANDUM
TO THE WRIT OF CERTIORARI

November 29, 2016
Bishopville, South Carolina

Alan Bruce Carruthers
Alan Bruce Carruthers, #326809
Lee Corr., Inst., F6A-1157
990 Wisacky Highway
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Petitioner, Pro Se

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Telephone: UNKNOWN
Attorney for Respondent

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DEC - 1 2016

S.C. SUPREME COURT

ISSUE PRESENTED

Did the PCR Court err in denying Petitioner relief and the PCR Court (59e) again denied Petitioner relief where plea counsel provided ineffective assistance by failing to discuss the matter in the Proceeding(s) preserved on record. The issues are ineffective assistance of Court appointed Counsel and Prosecution Fraud upon the Court by making wrongfull presentation to Evidence.

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STATEMENT

This memorandum in support of the Issues of this Petitioner. As a well preserved set of the disclosed and Amended (PCR) alleged on the application. These all were accepted by the Circuit Court, and a hearing held on December 15, 2015, in front of Judge Dickson, and Counsel, appeared with Applicant all present.

As my PCR Counsel had outlined and we argued the allegations of the original Amended documents for my relief that and here are of the following:

ALLEGATIONS

A - Failure to investigate the value of the photograph found in the "NOTEBOOK";

B - Failure to make a motion to a suppress or earmark evidence for a later review and We object to its value as credible evidence. That piece of evidence was SEALED by the Judge Cooper's Session Circuit Court.

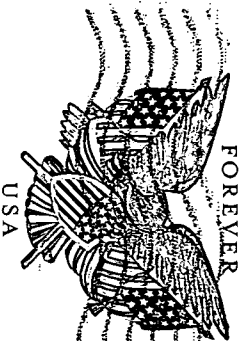
This information an known fact that was told to the Counsel of record who did not make an objection in the Proceeding. The issue od the day and day after day I had to be aware that the South Carolina State Court was deprived that value of the truth of the matter and that's how the Judge may have issued so much "Time" at Sentencing.

The photograph was not one of me or the complainant. Only with that one misleading picture to the Judge did the error of the evidence support the Offense of the CSC Charge; that I was Coerced to Plea to and not make any waves, says the General Counsel one Mr. Ralph Kennedy. Mr, Kennedy, was Present for the entire Almost four years pre-trial detention.

This is my Response for consideration to the Court have merits to this Response. It is Evidence that can be made known and prove to the Honorable Court as such.

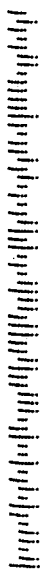
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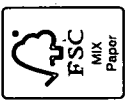
South Carolina Supreme Court
1231 Gervais Street
Columbia, SC 29211

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