

CHARLTON L. HILL  
152778 MCCI F2  
386 REDEMPTION WAY  
McCORMICK, S.C. 29899

25 NOVEMBER 2016

THE SUPREME COURT OF SOUTH CAROLINA  
DANIEL E. SHEAROUSE, CLERK OF COURT  
P.O. Box 11330  
COLS., S.C. 29211

**RECEIVED**

DEC 05 2016

S.C. SUPREME COURT

RE: ADDENDUM TO PETITION FOR WRIT OF CERTIORARI,  
PRO SE, APPELLATE CASE No. : 2015-002428.

DEAR CLERK, YOUR HONOR;

MAY THE COURT PLEASE: ACCEPT MY SINCERE APOLOGY.  
AS IT WERE, ON MY SECOND (2ND) - MOTION FOR EXTENSION  
OF TIME, I DID NOT MAKE CLEAR THAT THE ALLOTTED TIME  
WAS NOT ONLY INADEQUATE TO HANDWRITE COPIES, BUT,  
ALSO, THAT MY INTENTIONS ARE TO FILE AN ADDENDUM  
TO PREVIOUS COUNSEL'S SECOND (2ND) ARGUMENT ENTAILED  
IN THE ABOVE-NAMED PETITION FOR WRIT OF CERTIORARI.  
I.E. THE PER COURT ERRED IN NOT FINDING TRIAL COUNSEL  
INEFFECTIVE FOR FAILING TO INVESTIGATE PETITIONER'S CASE  
TIMELY...

AGAIN, I BEG THE COURT'S INDULGENCE; PLEASE, FILE  
THE ENCLOSED MISSIVE WITH THE ATTORNEY GENERAL'S OFFICE  
AT YOUR SOONEST CONVENIENCE.

RESPECTFULLY SUBMITTED,

Charlton L. Hill  
PRO SE

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

RECEIVED

DEC 05 2016

S.C. SUPREME COURT

APPEAL FROM DARLINGTON COUNTY  
HONORABLE THOMAS A. RUSSO, CIRCUIT COURT JUDGE

CHARLTON L. HILL,  
PETITIONER,

V.

STATE OF SOUTH CAROLINA,  
RESPONDENT.

AFFIDAVIT OF SERVICE

APPELLATE CASE No.:  
2015-002428

THE UNDERSIGNED HEREBY CERTIFIES THAT THE ORIGINAL HAND-WRITTEN ADDENDUM TO PETITIONER'S PETITION FOR WRIT OF CERTIORARI IN THE ABOVE-REFERENCED CASE HAS BEEN FILED WITH THE SOUTH CAROLINA SUPREME COURT, CLERK OF COURT, AT THE SUPREME COURT OF SOUTH CAROLINA, DANIEL F. SHEAROUSE, CLERK, P.O. BOX 11330, COLA., S.C. 29211.

Charlton L. Hill  
PRO SE

SUBSCRIBED & SWORN TO ME  
THIS 28 DAY OF November 2016

JC Franklin (L.S.)

NOTARY PUBLIC FOR SOUTH CAROLINA  
MY COMMISSION EXPIRES 12-16-2019.

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

ADDENDUM

CERTIORARI TO DARLINGTON COUNTY

HONORABLE THOMAS A. RUSSO, CIRCUIT COURT JUDGE

CHARLTON L. HILL,  
PETITIONER,

V.

STATE OF SOUTH CAROLINA,  
RESPONDENT.

ADDENDUM PRO SE TO  
PETITION FOR WRIT OF  
CERTIORARI

APPELLATE CASE No.:  
2015-002428

CHARLTON L. HILL, JR.  
152778 MCC1 F2  
386 REDEMPTION WAY  
McCORMICK, S.C. 29899

PRO SE

## ISSUE PRESENTED

2. B - PRO SE

DID THE PCR COURT ERR IN NOT FINDING TRIAL COUNSEL INEFFECTIVE FOR FAILING TO INVESTIGATE PETITIONER'S CASE TIMELY AND THEN ASKING FOR A... PRE-TRIAL CONTINUANCE, PURSUANT TO SOUTH CAROLINA RULES OF CRIMINAL PROCEDURE, IN ORDER TO: [1] ASSIST PETITIONER IN GATHERING WITNESSES; [2] INVESTIGATE PURPORTED PERSONAL RELATIONSHIPS BETWEEN CERTAIN INVESTIGATORS AND DECEDENT; [3] DISCUSS DISCREPANCIES BETWEEN HOSPITAL AND SLED BLOOD ANALYSES, RESULTS, POLICIES, PROCEDURES, AND METHODS WITH STATE'S EXPERT WITNESS DURING STATE'S PRETRIAL INVESTIGATION; OR [4] ASCERTAIN WHETHER OR NOT PERSONS ADMINISTERING BLOOD ALCOHOL TEST WERE TRAINED AND CERTIFIED BY SLED, USING METHODS APPROVED BY THAT AGENCY, AS ALSO REQUIRED BY S.C. CODE OF LAWS, SUBSECTION (a) OF 56-5-2950?

ARGUMENT

THE PCR COURT ERRED IN NOT FINDING

4. ~~TRIAL~~ COUNSEL INEFFECTIVE FOR FAILING TO CONDUCT ANY PRETRIAL INVESTIGATION, BOTH FACTUAL AND LEGAL, AND IN SPECIFIC, FAILING TO: [1] ASSIST APPLICANT IN GATHERING WITNESSES; [2] INVESTIGATE PURPORTED PERSONAL RELATIONSHIPS BETWEEN CERTAIN INVESTIGATORS AND DECEDENT; [3] DISCUSS DISCREPANCIES BETWEEN HOSPITAL AND SLED BLOOD ANALYSES RESULTS, POLICIES, PROCEDURES, AND METHODS WITH STATE'S EXPERT WITNESS DURING THEIR PRETRIAL INVESTIGATION; OR [4] ASCERTAIN WHETHER OR NOT PERSONS ADMINISTERING BLOOD/ALCOHOL TEST WERE TRAINED AND CERTIFIED BY SLED, USING METHODS APPROVED BY THAT AGENCY, AS ALSO REQUIRED BY SUBSECTION (a) OF 56-5-2950 §§ 2945.

FILED  
2013 MAR 25 PM 2:59  
SCOTT B. SUGGS  
CLERK OF COURT/RMG  
DARLINGTON COUNTY, S.C.

FACTS

- 4.1(A) FOLLOWING APPLICANT'S ARREST, A SEARCH WARRANT FOR THE IMPOUNDED VEHICLE WAS ISSUED AND SERVED. (ATTACHED)
- 4.1(B) PURSUANT TO WARRANT, EVIDENCE, INCLUDING APPLICANT'S CELLPHONE, ITEM TAG NO. : 01000 998, WAS CONFISCATED. (EVIDENCE... RECORD ATTACHED)
- 4.1(C) SAID CELLPHONE CONTAINS TELETRANSMITTED INFORMATION, INCLUDING APPLICANT'S ITINERARY OF JANUARY 8, 2010 - THE DAY OF THE ACCIDENT - THAT COULD ASSIST IN HIS DEFENSE, I.E. LOCATING POTENTIAL WITNESSES. (STORED LOCATION: BN 102)
- 4.1(D) APPLICANT'S RULE 5 DISCOVERY WAS DELIVERED PIECEMEAL AND ULTIMATELY INCOMPLETE. IN PARTICULAR, COUNSEL DID NOT ARRANGE FOR HIS CELLPHONE OR THE CONTENTS THEREOF, TO BE MADE AVAILABLE UPON REQUEST, TO AID IN CONTACTING PERTINENT WITNESSES.
- 4.1(E) COUNSEL FAILED TO LOCATE, INTERVIEW, AND GATHER KNOWN WITNESSES AS REQUIRED (COLLOQUY)

TRUE CERTIFIED COPY  
*Scott B. Suggs*  
CLERK OF COURT/RMG  
DARLINGTON COUNTY, S.C.

MR. SWILLEY: THERE ARE, YOUR HONOR. POTENTIAL WITNESSES THE DEFENSE MAY CALL WOULD BE MS. GRACE HILL, TIMMONSVILLE, SOUTH CAROLINA, EVA JEAN BLACKMON, DARLINGTON COUNTY, AND MACKIE TOMLINSON, WALLACE, SOUTH CAROLINA. (TRIAL TRANSCRIPT, PAGE 19, LINES 11-14)

... AND AGAIN, I APOLOGIZE FOR NOT BRINGING THIS TO THE COURT'S ATTENTION.

YOUR HONOR, THE THREE WITNESSES WHICH THE DEFENSE WOULD LIKE TO CALL --- ONE, THE MAIN WITNESS, WOULD BE MS. GRACE HILL, WHO IS THE DEFENDANT'S MOTHER IN THIS MATTER, I WENT AND SPOKE WITH MS. HILL YESTERDAY.

(TRIAL TRANSCRIPT, PAGE 76, LINES 9-15)

YOUR HONOR, ALSO ANOTHER WITNESS WHICH WOULD TESTIFY AS TO WHAT HE OBSERVED WHEN THE... DEFENDANT AND DECEDENT WHEN THEY WERE PROCEEDING TO LEAVE HIS HOME, A GENTLEMAN NAMED MACKIE TOMLINSON WHO I PUT ON THE DEFENSE WITNESS LIST... (TRIAL TRANSCRIPT, PAGE 76, LINES 23-25, PAGE 77, LINES 1, 2) ACCORDING TO TRIAL TRANSCRIPT, COUNSEL INTERVIEWED ONLY ONE OF HIS THREE LISTED WITNESSES, AND THAT ONE, JUST HOURS BEFORE TRIAL COMMENCEMENT.

- F) APPLICANT POSTED MISSIVES URGING COUNSEL TO THOROUGHLY INVESTIGATE CERTAIN DETAILS OF THE CASE; REQUESTING HIS RULE 5 DISCOVERIES; THE IMPERATIVE NATURE OF WITNESSES AND EVIDENCE TO FORMULATE A PROPER DEFENSE; AND RAISING PREJUDICIAL ISSUES CONCERNING THE PROSECUTION/ INVESTIGATORS.  
(THREE [3] LETTER ADDRESSED AND POSTED BY U.S. MAIL, PHOTOCOPIES ATTACHED)
- G) COUNSEL WAS MADE AWARE OF, ALBEIT, FAILED TO INVESTIGATE A FACTUAL LONG-TERM RELATIONSHIP BETWEEN STATE'S KEY- IN HIS CAPACITY AS ASSISTING IN THE ADMINISTERING OF BLOOD/ALCOHOL TEST, SEIZING THOSE

RESULTS, AND PROFFERED TESTIMONY— WITNESS, SGT. PATRICK NOEL LEE, AND THE DECEDENT, EVIDENCED BY SGT. LEE'S TESTIMONIES: PLEASE SEE COLOQUY, TRIAL TRANSCRIPT, PAGE 111, LINE 25, PAGE 112-121, LINES 1-25; AND PAGE 122, LINES 5-25, PAGE 123, LINES 1-25. PLEASE SEE ALSO, PROSECUTION'S CLOSING ARGUMENT, TRIAL TRANSCRIPT, PAGE 274, LINES 1-12.

### DISCUSSION

AT THE HEART OF EFFECTIVE REPRESENTATION IS THE INDEPENDENT DUTY TO INVESTIGATE AND PREPARE. GOODWIN V. BALKCOM 684 F.2d 794, 805 (11<sup>TH</sup> CIRCUIT)

THEREFORE, PERMISSIBLE TRIAL STRATEGY CAN NEVER INCLUDE THE "FAILURE" TO CONDUCT REASONABLY SUBSTANTIAL INVESTIGATION OF THE CASE. COUNSEL HAS AN AFFIRMATIVE DUTY TO CONDUCT APPROPRIATE INVESTIGATION, BOTH FACTUAL AND LEGAL.

COLES V. PEYTON, 389 F.2d 224, 226 (4<sup>TH</sup> CIRCUIT)

THE PRIMARY INPUT OF THE ATTORNEY TO THE CLIENT'S CASE, METICULOUS INVESTIGATION AND THOROUGH LEGAL ANALYSIS WILL OFTEN REVEAL A PANOPLY OF ISSUES— TO WHICH DEFENDANT, A LAYMAN, WILL BE OBLIVIOUS. GARLAND V. COX, 472 F.2d 875

THE INVESTIGATION SHOULD ALWAYS INCLUDE EFFORTS TO SECURE INFORMATION IN THE POSSESSION OF THE PROSECUTION AND LAW ENFORCEMENT AUTHORITIES. PLEASE SEE ABA CRIMINAL JUSTICE 4-4.1 (2<sup>ND</sup> ED. 1982 SUPP.)

THE FAILURE TO INVESTIGATE, RESEARCH, AND PREPARE IS EQUIVALENT TO NO REPRESENTATION AT ALL. BRUBAKER V. DICKSON, 310 F.2d 30, ACCORD WILLIAMS V. BETO, 354 F.2d 698, AND BROOKS V. TEXAS, 381 F.2d 619.

STATE OF SOUTH CAROLINA

COUNTY OF DARLINGTON

13CP160261  
SEARCH WARRANT

TO ANY BONDED LAW ENFORCEMENT OFFICER OF THIS STATE OR COUNTY OR OF THE MUNICIPALITY OF DARLINGTON

It appears from the attached affidavit that there are reasonable grounds to believe that certain property subject to seizure under provisions of Section 17-13-140, 1976 Code of Laws of South Carolina, as amended, is located on the following premises:

**DESCRIPTION OF PREMISES (PERSON, PLACE, OR THING)  
TO BE SEARCHED**

A 2005 CHEVROLET COBALT FOUR (4) BEARING SC LICENSE TAG # AAT 304, AND VIN# 1G1AK52F457580907 PRESENTLY LOCATED AT 1257 OLD FLORENCE RD. (SCOTT'S COLLISION CENTER) DARLINGTON, SC DARLINGTON COUNTY. TRAVELING FROM THE DARLINGTON COUNTY SHERIFF'S OFFICE LOCATED ON HARRY BYRD HWY. SC 151 IN DARLINGTON SC DARLINGTON COUNTY: GO EAST ON SC-151 PAST ROGERS ROAD FOR APPROXIMATELY 1.8 MILES MERGE ONTO US-52 SOUTH (S. GOV. WILLIAMS HWY). TRAVELING SOUTH FOR APPROXIMATELY 3.3 MILES TURN LEFT ONTO OLD FLORENCE RD., TRAVELING APPROXIMATELY 1 MILE TO 1257 OLD FLORENCE RD. (SCOTT'S COLLISION CENTER) LOCATED ON THE RIGHT.

Now, therefore, you are hereby authorized to search the subject premises for the property described below and to seize such property if found:

**DESCRIPTION OF PROPERTY SOUGHT**

ANY AND ALL ALCOHOLIC BEVERAGES, NARCOTICS, NARCOTIC PARAPHERNALIA, TRACE EVIDENCE, BLOOD, OR ANY AND ALL EVIDENCE AS IT PERTAINS TO OWNERSHIP OF LIKE ITEMS TO INCLUDE ANY AND ALL EVIDENCE RELATING TO ALCOHOL, NARCOTICS AND TRAFFIC VIOLATIONS. ANY AND ALL EVIDENCE AS IT PERTAINS TO FELONY DRIVING UNDER THE INFLUENCE RESULTING IN DEATH, FAILURE TO STOP FOR A BLUE LIGHT, AND DRIVING UNDER SUSPENSION

This Search warrant shall not be valid for more than ten days from the date of issuance.

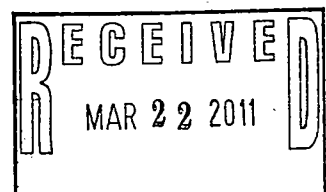
A written inventory of all property seized pursuant to this Search Warrant shall be made to  
**JUDGE CURTIS**

Within ten days from the date of this warrant, such inventory to be signed by the officer executing this warrant, and a copy of such inventory shall be furnished to the person whose premises are searched if demand for such copy is made.

A copy of this Search Warrant shall be delivered to the person in charge of the premises searched at the time of such search if practicable, and, if not, to such person as soon thereafter as is practicable; in the event the identity of the person in charge is not known or if such person cannot be found after reasonable diligence in attempting to locate the person, a copy shall be attached to a prominent place on such premises.

Darlington, S.C.  
January 9, 20-10

Deatrice Barnett Curtis (L.S.)  
Signature of Judge



# Evidence/Stored Property Record

## Darlington County Sheriff's Office

Evidence/Stored Property Item(s) **13CP160261**  
Item Information

Owner Name:		Owner Address:			Owner Phone #:	
Date Obtained: 01/09/2010	Time Obtained: 17:00	Obtaining Officer: 17914 - SGT. RUSSELL R. HARRELL		Location Obtained: SCOTT'S TOWING-OLD FLORENCE RD., Darlington		
Obtained From Name:		Obtained From Address:			Obtained From Phone #:	
Item Tag Number: 01000998	Property Type: 77 - Other		Item Category:		Value:	Quantity: 1
Make: MOTOROLA		Model: RAZR		Item Description: CELL PHONE		
Serial Number:		Owner Number:		Primary Color:	Secondary Color:	Date Sent To Lab:
Lab Sent To:		Lab Number:		Lab Results:		
Vehicle Type:		Year:	Vehicle Style:		License Plate #:	State: VIN:
Drug Type:		Description:			Measurement:	Quantity:

### Storage Information

Date Stored: 01/10/2009	Time Stored: 19:00	Storing Officer: 17914 - SGT. RUSSELL R. HARRELL	Impound Location:
Stored Location: Bn: 102			

### Item Disposition

Disposition:		Disposition Description:		Disp. Date:	Disp. Time:
Officer Executing Disposition:		Disposition Authority:		Authority Date:	Officer Witnessing Item Destruction:
Auction/Sale Amount:	Released To Name:		Released To Address:		
				Phone Number:	

2013 MAR 22 PM 12:58  
 RECEIVED  
 SCOTT B. SUGGS  
 CLERK OF COURT/R.O.D.  
 DARLINGTON COUNTY, S.C.

**RECEIVED**  
 MAR 22 2011  
 By \_\_\_\_\_

13CP160261

CHARLTON L. HILL  
DCDC Pod B 108  
2349 ROGERS RD.  
DARLINGTON, SC. 29532

MATT SWILLY, ESQ.  
S/O P.D. OFFICE  
300 RUSSELL ST.  
DARLINGTON, SC.

2013 MAR 25 PM 12:58  
SCOTT B. SUGGS  
CLERK OF COURT/R.O.D.  
DARLINGTON COUNTY, SC

FILED

RE: REQUEST FOR PROMPT ASSISTANCE OF COUNCIL, 12-10-10

DEAR MR. SWILLY:

AS YOU ARE AWARE, MY BOND HAS BEEN REVOKED AND I AM CURRENTLY IN JAIL AT THE ABOVE LOCATION. THEREFORE, I AM IN NEED OF YOUR ASSISTANCE OF COUNCIL AS SOON AS POSSIBLE.

I HAVE AT LEAST SEVEN (7) FELONY CHARGES PENDING. SOME OF WHICH DATE BACK TO 2007. SEVERAL OF THESE CHARGES ARE UNFOUNDED AND WITHOUT MERIT WHILE OTHERS HAVE MITIGATING CIRCUMSTANCES AND ARE IN NEED OF INVESTIGATION.

PLEASE, VISIT ME AT YOUR SOONEST CONVENIENCE SO THAT WE CAN FORMULATE PROPER DEFENCES, AND DISCUSS THESE URGENT MATTERS.

SINCERELY,

Charlton Hill

*(Signature)*

This 6th day of December 2010  
Rosena Jamir  
my Commission expired 01-26-10

3/5

P.S. I NEED INDICTMENT NUMBERS AND RULE 5 DISCOVERIES.

CC SELF/201005133; PUBLIC DEFENDERS OFFICE VIA INMATE/STAFF

13CP160261

CHARLTON L. HILL, JR.  
1 DECEMBER 108  
2349 ROGERS RD.  
DARLINGTON, SC. 29532

MATT SWILLEY, ESQ.  
PO BOX 648  
DARLINGTON, SC. 29540

FEBRUARY 21, 2011.

RE: THE STATE V. CHARLTON HILL.

MR. SWILLEY:

I DO UNDERSTAND YOUR POSITION WITH REGARDS TO MY CASE, NEVER THE LESS PLEASE PROCEED WITH THE MOTION FOR BOND REDUCTION AS SOON AS POSSIBLE. I HAVE BEEN AWAITING A HEARING WITH FRED WILHELM FOR ALMOST FOUR (4) MONTHS NOW. IT WOULD SEEM TO ME, REGARDLESS OF THE COURT'S LOG, THAT MY DUE PROCESS RIGHT IS BEING INFRINGED UPON.

IF YOU WERE USING YOUR PREREQUISITE WHEREWITHAL YOU WOULD HAVE NOTICED THAT I NAMED YOU AS COUNSEL, ALBEIT I WROTE THE MOTION FOR BOND REDUCTION, AND ATTEMPTED TO FILE VIA YOUR OFFICE. ALSO, YOU WOULD HAVE DISCOVERED THAT A WARRANT (J-670371) WAS SERVED; AN ARRAIGNMENT HELD; AND A PRELIM. CONDUCTED, WITH ASSISTANCE FROM YOUR OFFICE, CONCERNING 16-13-230(B)(3). THE VICTIM, GRACE HILL, TRIED TO DROP THE CHARGES, BUT MR GUY BELL, ESQ., OVERRULED MY MOTION TO DISMISS.

MY MOTHER IS READY AT THIS TIME TO POST BAIL FOR ANY AND ALL OFFENCES THAT ARE ALLEGED. SHE, MY EX-WIFE, AND MY MINISTER HAD ATTEMPTED TO CONTACT YOU CONCERNING THIS, THEREFORE, PLEASE FILE THE PROPER MOTION IN A TIMELY FASHION.

THANK YOU FOR YOUR TIME AND COOPERATION.

YOURS VERY TRULY,  
Charlton L. Hill

CC: SELF \*2010105133\* This 21<sup>st</sup> day of February 2011  
AC STEPHENS, ESQ. Rosena Samu

CHARLTON L. HILL  
1000 PO BOX 108  
2349 ROGERS RD.  
DARLINGTON, SC.

13CP160261

1 OF 2

MATTHEW SWILLY, ESQ.  
300 RUSSELL STREET  
DARLINGTON, SC. 29540

2013 MAR 25 PM 12:59  
SCOTT B. SUGGS  
CLERK OF COURTY, O.D.  
DARLINGTON COUNTY, S.C.

FILED

RE: STATE V. C. HILL, J-670371, J-662997, -8, -9.

DEAR MATT:

THANK YOU FOR YOUR ASSISTANCE IN LOWERING MY BOND; YOUR LEGALESE IS IMPRESSIVE. I HAVE A NEW-FOUND RESPECT FOR YOUR LEGAL EXPERTISE, IF MY PRESUMPTION IS, IN FACT, CORRECTLY FOUNDED.

IN THE INTEREST OF JUSTICE, AS SET FORTH BY THE ABOVE REFERENCED MOTION (3.4.2011), IT IS IMPERATIVE THAT I ... BE RELEASED BEFORE TRIAL. IN ORDER TO HELP YOU GATHER EVIDENCE, LOCATE WITNESSES, AND BASICALLY FORMULATE A PROPER DEFENCE.

HEREFORE I WOULD APPRECIATE A TRANSCRIPT OF THE ABOVE REFERENCED PROCEEDINGS. A TRIAL (OR PLEA?) MUST BE DELAYED AT ALL COSTS. PLEASE, CONTINUE TO BE HONEST AND FORTHRIGHT, AND I WILL BE FRANK. THIS SOLICITOR IS PRESUDICED BY, AMONG OTHER THINGS, HER PROSECUTION OF ME ON A PRIOR VENUE, CONCERNING A CDV WITH THE ALLEGED VICTIM. SHE REFERRED TO A VIDEO, THAT I HAVEN'T HAD THE OPPORTUNITY TO REVIEW, WHICH, IN HER OPINION, WILL OPEN AND SHUT MY CASE.

AGAIN, I REMIND YOU OF MITIGATING CIRCUMSTANCES THAT WILL NOT BE TAKEN INTO ACCOUNT, UNLESS I RECEIVE A FAIR AND IMPARTIAL TRIAL, IN CONJUNCTION WITH EFFECTIVE REPRESENTATION BY YOU AND YOUR OFFICE.

THIS BEING SAID, IN ADDITION TO THE ABOVE REFERENCED TRANSCRIPT, I WOULD LIKE YOU TO FILE A MOTION FOR THE CHANGE OF VENUE, BASED ON THE FOLLOWING:

- 01) I'M BEING SUED FOR WRONGFUL DEATH BY A PROMINENT
- 02) ATTORNEY FOR DARLINGTON COUNTY; MY CASE RECEIVED BIASED ATTENTION VIA THE MEDIA, I.E. LOCAL NEWS BROADCASTS, THREE (3) LOCAL NEWS PAPERS, INTERNET ACCESS
- 03) INCLUDING "FACE BOOK"; PERSONAL RELATIONSHIPS WITH SEVERAL OF THE INVESTIGATING OFFICIALS AND THE
- 04) ALLEGED VICTIM; INTERVIEWS (QUESTIONING) BEFORE MY MIRANDA WARNING WAS GIVEN.

NOTWITHSTANDING THE STATE ARGUING AGGRAVATING CIRCUMSTANCES IN CONTRAST TO MY MITIGATING REASONS, I MUST STRONGLY SUGGEST EACH AND EVERY FACET OF MY CASE BE INVESTIGATED AND EXPLOITED ACCORDINGLY AND TO THE BEST OF OUR ABILITIES TO ENSURE "DUE PROCESS OF LAW".

REGARDLESS OF PROPER OPINION, THIS IS NOT, NOR WILL IT BE, AN OPEN AND SHUT CASE TO BE DEALT WITH IN TRAVESTY! I TRUST YOU AND THE CAPACITY OF YOUR OFFICE TO ENSURE PROPER CARRIAGE OF JUSTICE AND A FAIR TRIAL IN THIS IMPORTANT CASE.

YOURS VERY TRULY,  
S/ Carlton L. Hill 3.10.11

cc: AC. STEPHENS, ESQ. This 11 day of March 2011  
SELF \*2010105133\* Rosena Janner  
ENCLOSURES, my commission expired 01-26-2019



# SLED LABORATORY FORENSIC SERVICES REQUEST

(Use ballpoint pen and press firmly. Print all information except where signature is required.)

## 13CP160261

FORM: LAB-003  
NOVEMBER 1993  
Previous Editions  
May Be Used

Name of Investigating Officer: Patrick Lee Rank: Sgt  
 Department: Washington County Sheriff's Office Telephone Number: 843-378-4501  
 Street Address or Post Office Box: P.O. B. 783  
 City: Washington State: SC Zip Code: 29540  
 Sled Lab No.: \_\_\_\_\_  
 Contributing Agency ORI: SC 01160000  
 Contributing Agency Case No.: 201001-0201  
 County: Washington  
 Incident Date: 01-08-2010  
 CC: \_\_\_\_\_ Related Lab No.: \_\_\_\_\_

Subject # 1 Victim # \_\_\_\_\_ Sex: M  F \_\_\_\_\_  
 Last Name: Hill First Name: Charles Middle Name: Letate  
 SID/FBI: \_\_\_\_\_ DLSS NO.: \_\_\_\_\_  
 Race: Cau  Blk \_\_\_\_\_ Other \_\_\_\_\_  
 DOB: 5

Subject # \_\_\_\_\_ Victim # \_\_\_\_\_ Sex: M \_\_\_\_\_ F \_\_\_\_\_  
 Last Name \_\_\_\_\_ First Name \_\_\_\_\_ Middle Name \_\_\_\_\_  
 SID/FBI: \_\_\_\_\_ DLSS NO.: \_\_\_\_\_  
 Race: Cau \_\_\_\_\_ Blk \_\_\_\_\_ Other \_\_\_\_\_  
 DOB: \_\_\_\_\_

Subject # \_\_\_\_\_ Victim # \_\_\_\_\_ Sex: M \_\_\_\_\_ F \_\_\_\_\_  
 Last Name \_\_\_\_\_ First Name \_\_\_\_\_ Middle Name \_\_\_\_\_  
 SID/FBI: \_\_\_\_\_ DLSS NO.: \_\_\_\_\_  
 Race: Cau \_\_\_\_\_ Blk \_\_\_\_\_ Other \_\_\_\_\_  
 DOB: \_\_\_\_\_

Subject # \_\_\_\_\_ Victim # \_\_\_\_\_ Sex: M \_\_\_\_\_ F \_\_\_\_\_  
 Last Name \_\_\_\_\_ First Name \_\_\_\_\_ Middle Name \_\_\_\_\_  
 SID/FBI: \_\_\_\_\_ DLSS NO.: \_\_\_\_\_  
 Race: Cau \_\_\_\_\_ Blk \_\_\_\_\_ Other \_\_\_\_\_  
 DOB: \_\_\_\_\_

\*Could any subjects or victims have the following: (circle) AIDS VD Hepatitis Tetanus TB Lice  
 Comments: \_\_\_\_\_

**COMPLETE THIS SECTION ON ALL CASES: (Circle Appropriately)**  
 Homicide Suicide Accidental Death Natural Death Child Fatality Autopsy Performed: Yes No  
 (A) Gunshot (B) Stabbing (C) Beating (D) Strangulation (E) Drug/Poison (F) Alcohol (G) Carbon Monoxide (H) Fire (I) Hanging (J) Electrocution  
 (K) Heart Related (L) Disease (M) Other \_\_\_\_\_  
 Accident Fatality Victim: (A) Driver (B) Pedestrian (C) Motorcyclist (D) Bicyclist (E) Passenger (F) Swimming/Boating  
 TYPE OF CASE: (IF NOT DEATH) (A) Drugs (B) CSC (C) Burglary (D) Larceny (E) Other \_\_\_\_\_

**FOR TOXICOLOGY CASES: (Circle Appropriately)**  
 DUI Felony DUI Was a Breath Test given? Yes No If Yes, Reading \_\_\_\_\_  
 Number of Specimens Enclosed: Blood 2 Urine 1 Ocular Fluid \_\_\_\_\_ Other \_\_\_\_\_  
 Examination Requested: Blood Alcohol Drug Screen CO Blood Type Other \_\_\_\_\_  
 Drugs Suspected: Yes No List Drugs: Marijuana - Bupropion - Cocaine

**FOR SEROLOGY/ DNA/HAIR/FIBER CASES: (Circle Appropriately)**  
 Was the subject(s) bleeding? Yes No Unknown Have any of the victims / subjects been transfused in the last 100 days? Yes No Unknown  
 Crime occurred: Suspect's residence Victim's residence Suspect's vehicle Victim's vehicle Other \_\_\_\_\_  
 Was a weapon involved? Yes No Unknown Type of weapon? \_\_\_\_\_  
 Have standards from all possible bleeders or body fluid donors been submitted? Yes No Unknown Comments: \_\_\_\_\_  
 By: \_\_\_\_\_

**RECEIVED**  
 MAR 22 2011

Submission of victim and suspect standards is necessary before complete analysis can be performed.

THE ITEMS SUBMITTED WILL BE EXAMINED WITH YOUR ASSURANCE THAT THE SUBMITTED SPECIMENS HAVE NOT NOR WILL BE SUBMITTED TO ANY OTHER LABORATORY FOR TECHNICAL OR SCIENTIFIC EXAMINATION. THIS STATEMENT WAS READ BY OFFICER.

Print Name of Delivering Officer

Signature of Delivering Officer

FORTIOR EXHIBIT LIII

**SOUTH CAROLINA LAW ENFORCEMENT DIVISION - URINE/BLOOD COLLECTION REPORT**

Subject: Hill Charlton Lotate Darlington  
Last Name First Name Middle Name County of Arrest

Subject's Address: 5 Sinsburg Rd Timmons, SC 29101

Driver's License Number: 005080700 State: SC DOB: " Sex: M Race: W

Arresting Officer: Patrick Lee Agency: Darlington County Sheriff's Office

Arresting Officer's Address: 1071 Hwy 202 Hwy Darlington - SC - 29540

Date of Arrest: 01-08-2010 Time of Arrest: 20:18 AM/PM Traffic Ticket Number: Waiting Pending

Date of Test: 01-08-2010 Time of Test: 2018 AM/PM Location of Collection: Carolina Kings

**CHECK THE FOLLOWING (CHECK BOTH IF APPLICABLE)**

- Subject is under arrest for Section 56-5-2930, 56-5-2933, 56-5-2945, 56-1-2120, 50-21-112, 50-21-113 or 23-31-415; or is in violation of Section 56-5-2945, 50-21-113 or 56-1-286 of the 1976 South Carolina Code of Laws as amended.
- Subject has been advised in writing of his/her Implied Consent Rights.

**CHECK THE CORRECT ONE (ONLY ONE CAN APPLY)**

- Subject had a DataMaster reading of less than 0.08%, and a urine sample is requested. DataMaster reading: \_\_\_\_\_ (optional)
- Subject is unconscious or otherwise incapable of refusal and is considered informed, therefore, a blood sample is requested.
- A blood sample is requested by the arresting officer because a licensed medical person has informed the officer that the subject is unable to take a breath test at this time due to any reason deemed acceptable by that licensed medical person.
- Subject is under arrest for, or in violation of, Section 56-5-2945 or 50-21-113, and, pursuant to Section 56-5-2946 or 50-21-116, a blood sample or a blood and urine sample is/are requested.
- A blood sample is requested by the subject for his/her own independent test.

Name and Title of Licensed Medical Personnel: MARLA KUNTZ RN  
(Please Print)

Signature of Licensed Medical Personnel: \_\_\_\_\_

**THIS SECTION TO BE CHECKED BY SAMPLE COLLECTOR**

- Using a non-ethanol prep, a blood sample was collected into an unused, uncontaminated vial and given directly to the arresting officer (or to the subject requesting sample for his/her independent test) after collection.
- A urine sample was collected into an unused, uncontaminated container and given directly to the arresting officer after collection.

Name of Licensed or Trained Collector: MARLA KUNTZ RN  
(Please Print)

Signature of Licensed or Trained Collector: \_\_\_\_\_

**FINAL CHECKS FOR LAW ENFORCEMENT OFFICER**

- Sample collection was under my direct supervision.
- Sample container is properly labeled with the subject's name and time of collection.
- Sample is properly sealed and ready for transport.

Signature of Officer: Sgt. Patrick Lee (B-2) Date: 01-08-2010

I, Issue unable to sign bloody Medical Treatment received a copy of this report on 01-08-2010  
(Subject's Signature) Date

13CP160261

SOUTH CAROLINA LAW ENFORCEMENT DIVISION  
FORENSIC SERVICES LABORATORY REPORT

MARK SANFORD  
Governor



REGINALD I. LLOYD  
Director

Lt. Eric A. Hodges  
Darlington County Sheriff's Office  
P.O. Box 783  
Darlington, SC 29540

TOXICOLOGY DEPARTMENT  
February 22, 2010  
SLED No: L10-00610  
Your Case No: 2010010201, FA10027  
Incident Date: 01/08/2010

[S] Charlton Hill  
[V]

This is an official report of the South Carolina Law Enforcement Division Forensic Services Laboratory and is to be used in connection with an official criminal investigation. These examinations were conducted under your assurance that no previous examinations of person(s) or evidence submitted in this case have been or will be conducted by any other laboratory or agency.

Reginald I. Lloyd, Director  
South Carolina Law Enforcement Division

PARTIAL REPORT

ITEMS OF EVIDENCE

Item: 3 Sample Type: Blood (Toxicology) - labeled "HILL, CHARLTON"

Analysis by Headspace Gas Chromatography (GC) and/or Headspace Gas Chromatography/Mass Spectrometry (GC/MS)

Analyte	Result	Units	Threshold
Ethanol	0.152	% w/v	0.01

Screen by Enzyme Linked Immunosorbant Assay (ELISA)

Analyte	Result	Units	Threshold
Benzodiazepines	Positive	mg/L	0.05
Cannabinoids	Positive	mg/L	0.03
Amphetamine	Negative	mg/L	0.15
Methamphetamine	Negative	mg/L	0.15
Oxycodone	Negative	mg/L	0.10

RECEIVED  
MAR 08 2010



P.O. Box 21398, Columbia, South Carolina 29221-1398 Phone (803) 896-7300 Fax (803) 896-7351

Screen by Fluorescence Polarization Immunoassay (FPIA)

Analyte	Result	Units	Threshold
Cocaine Metabolite	Positive	mg/L	0.10
Opiates	Positive	mg/L	0.10

Quantitation by Fluorescence Polarization Immunoassay (FPIA)

Analyte	Result	Units	Threshold
Acetaminophen	24	mg/L	
Synonyms: Tylenol®			
Notes: Therapeutic levels: 10-20 mg/L			

Analysis by Gas Chromatography/Mass Spectrometry (GC/MS)

Analyte	Result	Units	Threshold
Benzoylcegonine	0.23	mg/L	
Synonyms: BE, Cocaine metabolite/hydrolysis product			
Hydrocodone	0.20	mg/L	
Synonyms: Lortab®, Vicodin®			
Notes: Therapeutic levels: 0.03-0.25 mg/L			
11-carboxy-Tetrahydrocannabinol	7.7	µg/L	2.00
Synonyms: THC metabolite			
Acetaminophen	Positive	mg/L	
Synonyms: Tylenol®			
Notes: Therapeutic levels: 10-20 mg/L			
Diphenhydramine	Positive	mg/L	
Synonyms: Benadryl®, Benahist®, Unisom®			
Notes: Therapeutic levels: 0.025-0.112 mg/L			
Tramadol	0.16	mg/L	
Synonyms: Ultram®, Tramal®, Topalgic®			
Notes: Therapeutic levels: 0.1-0.6 mg/L			
O-Desmethyltramadol	0.04	mg/L	
Synonyms: Tramadol metabolite			

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 DARLINGTON COUNTY, S.C.

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Liquid Chromatography/Tandem Mass Spectrometry (LC/MS/MS)

Analyte	Result	Units	Threshold
Benzodiazepines	Negative	mg/L	
Analytes of interest include 7-Aminoflunitrazepam, 7-Aminoclonazepam, alpha-hydroxyalprazolam, Alprazolam, Chlordiazepoxide, Clonazepam, Desalkylflurazepam, Diazepam, Lorazepam, Midazolam, Nordiazepam, Oxazepam, Temazepam, and Triazolam.			

RECEIVED

MAR 28 2010



2/22/10

Analyte	Result	Units	Threshold
Carisoprodol Synonyms: Soma® Notes: Therapeutic levels: 10-40 mg/L	2.0	mg/L	
Meprobamate Synonyms: Equanil®, Miltown®, Carisoprodol metabolite Notes: Therapeutic levels: 2-26 mg/L	0.18	mg/L	

**Comprehensive Analysis**

A comprehensive analysis was performed on this sample. With the exception of the compound(s) listed, no other drugs or poisons of concern were found.

**Item: 4**      **Sample Type: Urine** - labeled "Charlton Lefate Hill"

**No Analysis Performed**

*Jennifer Brown*

Jennifer M. G. Brown  
Forensic Toxicologist

2013 MAR 25 PM 12:59  
SCOTT B. SUGGS  
CLERK OF COURT/R.O.D.  
DARLINGTON COUNTY, S.C.

FILED

CC: Dr. Janice E Ross - Newberry Pathology  
Coroner J. Todd Hardee - Darlington County Coroner's Office

Biological specimens processed for testing which are not consumed during analysis will be maintained for 180 days from the completion date of the analysis and then destroyed unless otherwise notified.



P.O. Box 21398, Columbia, South Carolina 29221-1398 Phone (803) 896-7300 Fax (803) 896-7351

FOI/TOR EXHIBIT LVI

14

permanent

CUMULATIVE REPORT

CAROLINA PINES REGIONAL MEDICAL CENTER  
1304 West Bobo Newsom Highway, Hartsville, SC 29550  
Harold N. Wheeler, M.D., Pathologist

PATIENT: HILL, CHARLTON  
I.D.#: 8975878

MRN: 0000118203 LOCATION: 3SG-0316-  
DOB: /1962 AGE: 47 SEX: M

continued

C H E M I S T R Y

	I1080493-M3	I1080495-M2	I1080499-M1	I109C064	REFERENCE RANGE
COLLECTED	01/08/10 20:25	01/08/10 20:25	01/08/10 20:25	01/09/10 02:53	
PRIORITY, PHYSICIAN	STAT BALVICH, JIM	STAT BALVICH, JIM	STAT BALVICH, JIM	TIMED DAMERON, JASON	

M5:

Reference Range	0 mg/dl
Limited muscular incoordination	<50 mg/dl
Incoordination	50-100 mg/dl
Incoordination, behavior changes (Legally intoxicated in most states)	100-150 mg/dl
Incoordination, prolonged reaction times (Legally intoxicated in most states)	>150 mg/dl

13CP160261

NOTE: Carolina Pines Regional Medical Center does NOT perform legal blood alcohols. No chain of custody exists. Results are for medical purposes only.

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2013 MAR 25 PM 12:59  
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CLERK OF COURT/R.O.D.  
DARLINGTON COUNTY, S.C.

\* - RESULT REPORTED FIRST TIME

ATT. PHYS.: DAMERON, JASON  
LOCATION: 3SG-0316-A

MRN: 0000118203  
PATIENT: HILL, CHARLTON

KEY FOR ABNORMAL COLUMN: L-LOW, H-HIGH, AB-ABNORMAL, P-PANIC

C H E M I S T R Y

CAROLINA PINES REGIONAL MEDICAL CENTER

HISTORY AND PHYSICAL

13CP160261

NAME: HILL, CHARLTON  
MR #: 000118203  
ROOM #: 0316 A

HOSPITAL #: 008975878  
DOB: /1962  
ADMITTED: 01/08/2010

CHIEF COMPLAINT: Car accident.

HISTORY OF PRESENT ILLNESS: The patient is a 47-year-old gentleman who presented to the emergency department on 01/08/2010 after being involved in a single car motor vehicle collision. The patient reportedly was being pursued by a police car which resulted in a single car collision. He does not recall the events of the accident. According to EMS records, he was found at the scene in the driver's seat. There was noted to be severe damage to the car. It is unsure whether or not he was wearing a seatbelt. Passenger in the car was dead on arrival. He was transferred to the emergency department, where on initial presentation he was noted a hemodynamically stable with a blood pressure 122/77, respiratory rate 16, O2 saturation is 90%, pulse of 84, temperature 96.8 degrees Fahrenheit. He reportedly complained of neck pain. His work-up included a CT scan of the head, face, chest, abdomen and pelvis, T-L spine and C-spine. His only acute traumatic injury was depressed comminuted nasal fracture. White count 10.8, with H&H 15.6 and 45.5, and platelet count 273 with normal differential. PTT 26.7, PT, INR both within normal limits. Blood type O-positive. Urinalysis was all within normal limits except for trace leukocyte esterase. Urine drug screen was positive for THC, cocaine and opiates. Comprehensive metabolic panel showed no abnormalities. Blood alcohol was 177.3. Amylase, lipase, CK-MB, CPK and troponin were all within normal limits.

PAST MEDICAL HISTORY: Includes gallbladder disease. Polysubstance abuse. Hepatitis C and questionable right inguinal hernia. General anxiety disorder with associated panic attacks. Burns to the left hand and wrist.

SURGICAL HISTORY: Includes cholecystectomy, right inguinal hernia repair. Skin grafting to his left hand and wrist. Peripheral neuropathy of the upper extremity reportedly associated with previous burn trauma.

MEDICATIONS:

1. Neurontin 600 mg p.o. 3 times a day.
2. Soma 350 mg twice daily.
3. Xanax 0.5 mg twice daily.
4. Tramadol 50 mg 4 times a day.

General anxiety disorder with associated panic attacks with burns to the left hand wrist please add to the surgical history.

Skin grafting to his left hand and wrist. Peripheral neuropathy of the left upper extremity reportedly associated with previous burn trauma and.

ALLERGIES: Include PENICILLIN and CODEINE.

SOCIAL HISTORY: Admits to marijuana use 2 to 3 times a week, cocaine use as much as possible. In his words if he could use it daily he would. Alcohol use type and quantity not specified. He previously lived with his wife.

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SOUTH CAROLINA  
DISTRICT COURT, S.C.

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MAR 08 2010

CAROLINA PINES REGIONAL MEDICAL CENTER  
 1304 West Bobo Newsom Highway Hartsville, SC 29550  
 Harold N. Wheeler, M.D., Pathologist

autoreporting lab

Patient name: HILL, CHARLTON

M.R.N.: 0000118203 Room:

Billing no.: 8975878

Location: EMERGENCY ROOM

Att.physician: BALVICH, JIM

Adm.date: 01/08/10 Surg.date:

DOB: /1962 Age: 47 Sex: M

Order Id : I1080495

FINAL

Date&Time Ordered: 01/08/10 19:55

13CP130261

COMMENTS:

RD. COMM: MVA -- MAJOR TRAUMA

TEST DRUG SCREEN RAPID WAS CANCELLED, 01/08/10 21:33 released in erro

C H E M I S T R Y

TEST-NAME	RESULT	ABN.	NRML-RANGE	UNITS
SPECIMEN URR COLLECTED 01/08/10 21:50 BY NURSE RECEIVED 01/08/10 22:04 BY CWB				

DRUG SCREEN (URINE)

COCAINE	✓ POSITIVE		NEGATIVE	
Edited report, previous value was	NEGATIVE,		reported at 21:28	on 01/08/10.
AMPHETAMINES	NEGATIVE		NEGATIVE	
Edited report, previous value was	NEGATIVE,		reported at 21:28	on 01/08/10.
OPIATES	✓ POSITIVE		NEGATIVE	
Edited report, previous value was	NEGATIVE,		reported at 21:28	on 01/08/10.
TETRAHYDROCANNIBOL THC	✓ POSITIVE		NEGATIVE	
Edited report, previous value was	NEGATIVE,		reported at 21:28	on 01/08/10.
BARBITURATES	NEGATIVE		NEGATIVE	
Edited report, previous value was	NEGATIVE,		reported at 21:28	on 01/08/10.
BENZODIAZEPINES	NEGATIVE		NEGATIVE	
Edited report, previous value was	NEGATIVE,		reported at 21:28	on 01/08/10.
PHENCYCLIDINE	NEGATIVE		NEGATIVE	
Edited report, previous value was	NEGATIVE,		reported at 21:28	on 01/08/10.
TRICYCLICS	NEGATIVE		NEGATIVE	ng/ml
Edited report, previous value was	POSITIVE,		reported at 21:28	on 01/08/10.
METHADONE	NEGATIVE		NEGATIVE	
Edited report, previous value was	NEGATIVE,		reported at 21:28	on 01/08/10.
METAMPHETAMINE	NEGATIVE		NEGATIVE	

This is a screening test for medical purposes only. Legal drug screens are not performed at Carolina Pines RMC. Confirmations or quantitations of positives should be ordered by the physician and will be sent to the reference laboratory.

Results are considered Positive when at or above the following values:

Acetaminophen 5ug/mL  
 Amphetamines 1000ng/mL

continued on next page

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 CLERK OF COURT  
 HARTSVILLE, S.C.  
 DARLINGTON COUNTY, S.C.

Patient name: HILL, CHARLTON  
 Location: EMERGENCY ROOM

MRN: 0000118203 Room:  
 Att.physician: BALVICH, JIM

Printed: 01/08/2010 22:31

PAGE: 1 of 2



Federal Bureau of Investigation  
Washington, D.C. 20535

October 19, 2012

Mr. Charlton L. Hill  
\*\*152778  
EB-59  
Lieber Correctional Institution  
Post Office Box 205  
Ridgeville, SC 29472-0205

13CP160261

FOIPA Request No.: 1200829-000  
Subject: Koontz, Marla

FILED  
2013 MAR 25 PM 12:59  
SCOTT B. SUGGS  
CLERK OF COURT, S.C.  
DARLINGTON COUNTY, S.C.

Dear Mr. Hill:

This acknowledges receipt of your Freedom of Information/Privacy Act (FOIPA) request to the FBI. The FOIPA number listed above has been assigned to your request.

You have requested records concerning a third party (or third parties). Records pertaining to a third party generally cannot be released absent express authorization and consent of the third party, proof that the subject of your request is deceased, or a clear demonstration that the public interest in disclosure outweighs the personal privacy interest and that significant public benefit would result from the disclosure of the requested records. Proof of death can be a copy of a death certificate, Social Security Death Index, obituary or another recognized reference source. Death is presumed if the birth date of the subject is more than 100 years ago. Since you have not furnished a Certification of Identity form, proof of death, or public justification for release, the release of records concerning a third party would result in an unwarranted invasion of personal privacy and would be in violation of the Privacy Act, Title 5 U.S.C. § 552a. These records are also generally exempt from disclosure pursuant to the FOIA, Title 5 U.S.C. § 552 exemptions (b)(6) and (b)(7)(C).

Enclosed is a Certification of Identity form. You may make additional copies of this form if you are requesting information on more than one individual. The subject of your request should complete this form and then sign it or prepare a document containing the required descriptive data and have it notarized. The original certification of identity, notarized authorization with the descriptive information and a legible, original signature must be provided to the FBI before an accurate search of our records can be conducted.

If requested, we will conduct a search for any public records maintained in our files, such as court records and news clippings, without the express authorization of the third party, proof of death, or public justification for release provided the subject is of sufficient public notoriety. If public records exist in our files and you desire to obtain them, please reply with a letter asking for the public documents. You can fax your request to (540) 868-4997, or mail to 170 Marcel Drive, Winchester, VA 22602, to the Attn: Initial Processing. If we do not receive a response from you within 30 days from the date of this letter, your request will be closed. You must include the FOIPA request number with any communication regarding this matter. This response should not be considered an indication of whether or not records responsive to your request exist in FBI files.

You may file an appeal by writing to the Director, Office of Information Policy (OIP), U.S. Department of Justice, 1425 New York Ave., NW, Suite 11050, Washington, D.C. 20530-0001, or you may submit an appeal through OIP's eFOIA portal at <http://www.justice.gov/oip/efoia-portal.html>. Your appeal must be received by OIP within sixty (60) days from the date of this letter in order to be considered timely. The envelope and the letter should be clearly marked "Freedom of Information Appeal." Please cite the FOIPA Request Number in any correspondence to us for proper identification of your request.



U.S. Department of Justice

Federal Bureau of Investigation  
Washington, D.C. 20535

November 19, 2012

13CP160261

Mr. Charlton L. Hill  
\*\*152778  
EB-59  
Lieber Correctional Institution  
Post Office Box 205  
Ridgeville, SC 29472-0205

FOIPA Request No.: 1200829-000  
Subject: Koontz, Marla

Dear Mr. Hill:

This is in response to your Freedom of Information/Privacy Act (FOIPA) request for information pertaining to the above subject. It is incumbent upon the requester to provide documentation regarding a subject's public notoriety before public source information can be processed pursuant to the FOIA. Absent proof of death or a privacy waiver from the individual involved, these records are exempt from disclosure pursuant to the FOIA, Title 5 U.S.C. § 552 exemptions (b)(6) and (b)(7)(C). See the enclosed form for an explanation of exemptions.

In accordance with standard FBI practice and pursuant to FOIA exemption (b)(7)(E) [Title 5 U.S.C. § 552 (b)(7)(E)], this response neither confirms nor denies the existence of your subject's name on any watch lists.

You may file an appeal by writing to the Director, Office of Information Policy (OIP), U.S. Department of Justice, 1425 New York Ave., NW, Suite 11050, Washington, D.C. 20530-0001, or you may submit an appeal through OIP's eFOIA portal at <http://www.justice.gov/oip/efoia-portal.html>. Your appeal must be received by OIP within sixty (60) days from the date of this letter in order to be considered timely. The envelope and the letter should be clearly marked "Freedom of Information Appeal." Please cite the FOIPA Request Number in any correspondence to us for proper identification of your request.

Sincerely,

David M. Hardy  
Section Chief  
Record/Information  
Dissemination Section  
Records Management Division

2013 MAR 25 PM 12:59  
SCOTT B. SUGGS  
CLERK OF COURT/R.O.D.  
DARLINGTON COUNTY, S.C.

FILED

Enclosure(s)



U.S. Department of Justice

Office of Information Policy

Telephone: (202) 514-3642

Washington, D.C. 20530

JAN 16 2013

Mr. Charlton L. Hill  
No. 152778  
Lieber Correctional Institution  
P.O. Box 205  
Ridgeville, SC 29472-0205

13CP160261

FILED  
2013 MAR 25 PM 12:59  
SCOTT B. SUGGS  
CLERK OF COURT/R.O.D.  
DARLINGTON COUNTY, S.C.

Re: Request No. 1200829 - Marla Koontz

Dear Mr. Hill:

This is to advise you that your administrative appeal from the action of the Federal Bureau of Investigation was received by this Office on December 14, 2012.

The Office of Information Policy has the responsibility of adjudicating such appeals. In an attempt to afford each appellant equal and impartial treatment, we have adopted a general practice of assigning appeals in the approximate order of receipt. Your appeal has been assigned number **AP-2013-01365**. Please mention this number in any future correspondence to this Office regarding this matter.

We will notify you of the decision on your appeal as soon as we can. If you have any questions about the status of your appeal you may contact me at the number above.

Sincerely,

Priscilla Jones  
Supervisory Administrative Specialist



Federal Bureau of Investigation

Washington, D.C. 20535

September 25, 2012

MR. CHARLTON L. HILL  
\*\*152778  
LIEBER CORRECTIONAL INSTITUTION EB-59  
POST OFFICE BOX 205  
RIDGEVILLE, SC 29472

13CP130261

FOIPA Request No.: 1198872- 000  
Subject: LEE, PATRICK N.

Dear Mr. Hill,

This acknowledges receipt of your Freedom of Information/Privacy Act (FOIPA) request to the FBI. The FOIPA number listed above has been assigned to your request.

You have requested records concerning a third party (or third parties). Records pertaining to a third party generally cannot be released absent express authorization and consent of the third party, proof that the subject of your request is deceased, or a clear demonstration that the public interest in disclosure outweighs the personal privacy interest and that significant public benefit would result from the disclosure of the requested records. Proof of death can be a copy of a death certificate, Social Security Death Index, obituary or another recognized reference source. Death is presumed if the birth date of the subject is more than 100 years ago. Since you have not furnished a Certification of Identity form, proof of death, or public justification for release, the release of records concerning a third party would result in an unwarranted invasion of personal privacy and would be in violation of the Privacy Act, Title 5 U.S.C. § 552a. These records are also generally exempt from disclosure pursuant to the FOIA, Title 5 U.S.C. § 552 exemptions (b)(6) and (b)(7)(C).

Enclosed is a Certification of Identity form. You may make additional copies of this form if you are requesting information on more than one individual. The subject of your request should complete this form and then sign it or prepare a document containing the required descriptive data and have it notarized. The original certification of identity, notarized authorization with the descriptive information and a legible, original signature must be provided to the FBI before an accurate search of our records can be conducted.

If requested, we will conduct a search for any public records maintained in our files, such as court records and news clippings, without the express authorization of the third party, proof of death, or public justification for release provided the subject is of sufficient public notoriety. If public records exist in our files and you desire to obtain them, please reply with a letter asking for the public documents. You can fax your request to (540) 868-4997, or mail to 170 Marcel Drive, Winchester, VA 22602, to the Attn: Work Process Unit. If we do not receive a response from you within 30 days from the date of this letter, your request will be closed. You must include the FOIPA request number with any communication regarding this matter. This response should not be considered an indication of whether or not records responsive to your request exist in FBI files.

You may file an appeal by writing to the Director, Office of Information Policy (OIP), U.S. Department of Justice, 1425 New York Ave., NW, Suite 11050, Washington, D.C. 20530-0001. Your appeal must be received by OIP within sixty (60) days from the date of this letter in order to be considered timely. The envelope and the letter should be clearly marked "Freedom of Information Appeal." Please cite the FOIPA Number assigned to your request to facilitate its identification.

Enclosed for your information is a copy of the FBI File Fact Sheet.

Very truly yours,

David M. Hardy  
Section Chief,  
Record/Information  
Dissemination Section  
Records Management Division

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MAR 25 PM 12:59  
SCOTT B. SUGGS  
CLERK OF COURT/ROD  
DARLINGTON COUNTY, S.C.

Enclosures



U.S. Department of Justice

Office of Information Policy

Telephone: (202) 514-3642

Washington, D.C. 20530

FEB 15 2013  
13CP160261

Mr. Charlton L. Hill  
No. 152778  
Lieber Correctional Institution  
P.O. Box 205  
Ridgeville, SC 29472-0205

2013 MAR 25 PM 12:58  
SCOTT B. SUGGS  
CLERK OF COURT/R.O.D.  
DARLINGTON COUNTY, S.C.

FILED

Re: Request No. 1198872 – Patrick Noel Lee

Dear Mr. Hill:

This is to advise you that your administrative appeal from the action of the Federal Bureau of Investigation was received by this Office on February 7, 2013.

The Office of Information Policy has the responsibility of adjudicating such appeals. In an attempt to afford each appellant equal and impartial treatment, we have adopted a general practice of assigning appeals in the approximate order of receipt. Your appeal has been assigned number AP-2013-01907. Please mention this number in any future correspondence to this Office regarding this matter.

We will notify you of the decision on your appeal as soon as we can. If you have any questions about the status of your appeal you may contact me at the number above.

Sincerely,

Priscilla Jones  
Supervisory Administrative Specialist

CONCLUSION OF ADDENDUM

BASED ON THE ABOVE, CERTIORARI SHOULD BE GRANTED AND THE ORDER OF THE PCR COURT REVERSED AND THE CASE REMANDED FOR A NEW TRIAL ON ISSUE 2 (J.B. PROSE). THE ORDER OF THE PCR COURT GRANTING A RELATED APPEAL SHOULD BE AFFIRMED ON ISSUE 1.

25 NOVEMBER 2016 Charlton L. Hill  
CHARLTON L. HILL, PRO SE

REC'D JUDGE  
NOV 25 2016

CHARLTON 2 Hill # 152728

McCormick Correctional Institute  
386 Redemption Way  
McCormick, SC 29899

THE SUPREME COURT OF SOUTH CAROLINA  
DANIEL F. SHEAROUSE, CLERK  
P.O. Box 11330  
Columbia, S.C. 29211