

**RECEIVED**

STATE OF SOUTH CAROLINA

MAY 31 2017

IN THE SUPREME COURT

**S.C. SUPREME COURT**

\_\_\_\_\_  
Appeal from Spartanburg County  
The Honorable Joseph Derham Cole Jr. Circuit Court Judge

\_\_\_\_\_  
2014-000764  
\_\_\_\_\_

The State,

Respondent,

vs.

Stephanie Irene Greene,

Appellant.

\_\_\_\_\_  
Motion for Bond Pending Appeal  
\_\_\_\_\_

Pursuant to Rule 246 of the South Carolina Appellate Court Rules, Stephanie Irene Greene, the Appellant herein, moves the Court for an order granting her bail in this matter during the appeal in this matter. This motion is based upon the following:

**DISCUSSION OF MERITS FOR APPEAL BOND**

On May 5, 2016, this Court, pursuant to Rule 204(b) of the South Carolina Appellate Court Rules, certified this matter to be heard by this Court. On June 14, 2016 this Court held oral arguments in the case. Stephanie Irene Greene has been incarcerated on the charges in this case since April 4, 2014. If this Court reverses the Homicide by Child Abuse case against Mrs. Greene, she will

have completed the five year concurrent sentence on her charges of Involuntary Manslaughter and Unlawful Conduct Toward a Child, in the event his Court affirms those convictions.

Mrs. Greene was indicted on September 15, 2011 for the death of her minor child which occurred on November 13, 2010. The State issued an arrest warrant on June 23, 2011 charging her with the crime. Mrs. Greene remained at her home in Campolello, SC until her arrest. Once released on bond, she complied with the conditions of her bond and also resided at her home in Campabello, SC with her husband.

Attached to this Motion are affidavits of members of the community where Mrs. Greene would be residing if she is released on bond attesting to the fact they do not believe her to be a danger to the community.

#### CONCLUSION

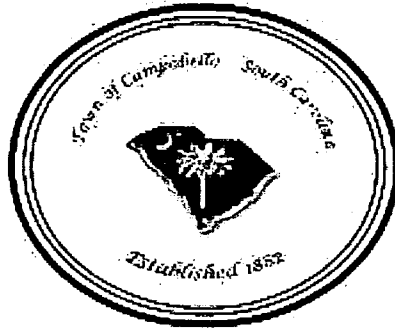
For the foregoing reasons, this Court should grant the request for appeal bond under such terms and conditions as this Court deems appropriate.

May 25, 2017



C. RAUCH WISE  
305 Main Street  
Greenwood, SC 29646  
(864) 229-5010  
[Rauch@simplepc.net](mailto:Rauch@simplepc.net)  
S. C. Bar № 06188

Attorney for Stephanie Irene Greene



## CAMPOBELLO POLICE DEPARTMENT

Police Chief Chad McNeill

208 N. Main Street | P.O. Box 9  
Campobello, SC 29322  
864-468-4545  
[chiefmcneill@yahoo.com](mailto:chiefmcneill@yahoo.com)

May 3, 2017

To whom it may concern,

I am writing this letter in reference to Stephanie Greene. Stephanie has been an acquaintance of mine for more than thirty years and as acting Police Chief of the Town of Campobello I would like it to be known Stephanie poses no threat to the Police Department or to the community or its residences.

As the Chief of Police of this town for more than ten years, I would ask that you accept this letter as a request from myself to release Stephanie Greene to give her a chance to restart her life as an active member of this community.

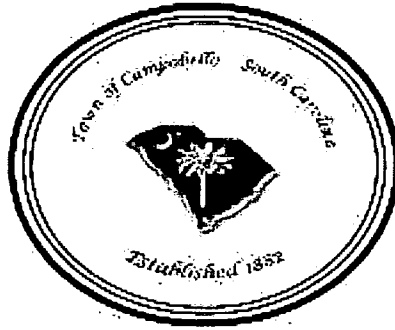
I would like to thank you for taking the time to acknowledge my request on Stephanie's behalf. If you have any additional questions or concerns, please feel free to contact my office.

Warm Regards,

Police Chief Chad McNeill

Committed to honor, serve and protect the Town of Campobello

**Jamie H. Gaddy**  
Notary Public, State of South Carolina  
My Comm. Exp. January 20, 2027



## TOWN OF CAMPOBELLO FIRE DEPARTMENT

William E. McNeill

50 Broad Street | P.O. Box 9  
Campobello, SC 29322  
864-468-4545  
[cfchiefed@yahoo.com](mailto:cfchiefed@yahoo.com)

May 3, 2017

To whom it may concern,

As the acting Fire Chief for the Town of Campobello I am writing you this letter on behalf of Stephanie Greene. I have known Stephanie for more than fifteen years and ensure you that she presents no threat to the Town of Campobello in anyway.

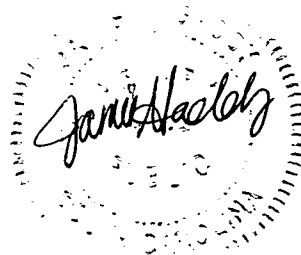
It is my request that you honor this letter as proof that I as well as the Town of Campobello welcomes her return back into our community.

If you have further questions on this matter, please contact me directly.

Sincerely,

  
William E. McNeill

Jamie H. Gaddy  
Notary Public, State of South Carolina  
My Comm. Exp. January 20, 2027



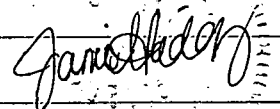
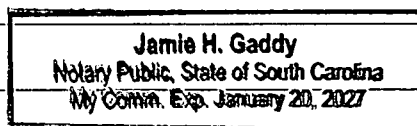
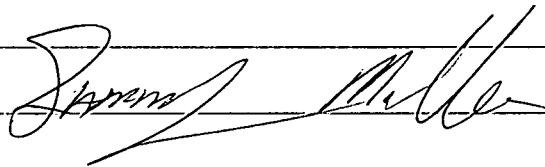
To Whom It May Concern,

I am pleased to write a character reference letter on behalf of Stephanie

For the past several years I have had worked for Stephanie's husband, Randy. Over this ~~time~~ period of time I have developed close personal relationships with both Randy and Stephanie. Stephanie is a wonderful and caring individual with whom I am proud to be friends. She is also ~~a~~ both a loving wife and mother to their son.

I would definitely recommend that Stephanie be considered for parole.

Sincerely,



I HAVE KNOWN STEPHANIE GREENE FOR 5 YEARS +  
AND HAVE NO KNOWLEDGE OF ANYTHING THAT WOULD  
MAKE GRANTING HER BOND A BAD IDEA. I BELIEVE  
THAT GRANTING HER BOND TO BE IN THE  
BEST INTEREST OF BOTH HER, THE STATE, AND  
HER FAMILY.

NATHAN CLARK

25 BENT TWIG DR

G'VILLE SC 29605



Jamie H. Gaddy  
Notary Public, State of South Carolina  
My Comm. Exp. January 20, 2027



To whom it may concern,

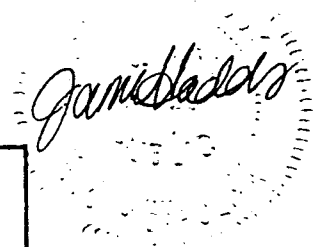
We have known Stephanie Greene for over a decade and have found her to be a conscientious and loving mother whose behavior and actions do not represent a threat to herself or society. Her behavior is predicated on her firm belief in God and country and is an example to her family and others.

Granting her bond until her appeal is ruled upon would be in keeping with the rich traditions of our justice system and represents what many would consider to be just.

*Edward E. Van Schaick*  
*Martha R. Van Schaick*

Edward E. & Martha R. Van Schaick  
3011 Highway 357  
Lyman, SC 29365

**Jamie H. Gaddy**  
Notary Public, State of South Carolina  
My Comm. Exp. January 20, 2027



THE STATE OF SOUTH CAROLINA  
In the Supreme Court

APPEAL FROM SPARTANBURG COUNTY  
Court of General Sessions

Hon. Joseph Derham Cole, Circuit Court Judge

Case No. 2014-000764

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MAY 30 2017

S.C. SUPREME COURT

The State,.....Respondent,

vs.

Stephanie Irene Greene.....Appellant.

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AFFIDAVIT OF SERVICE  
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PERSONALLY appeared before me Sandy Traynham who, after being duly sworn, deposes and says that she is the Secretary for C. Rauch Wise, Attorney for the Appellant in the above entitled case. That on May 25, 2017, she did deposit in the United States Mail with proper postage affixed thereto, one copy of the Motion For Bond Pending Appeal in the above case addressed to David Spencer, S.C. Attorney General Office, P.O. Box 11549, Columbia, SC 29211.

Sworn to and Subscribed

before me this 26<sup>th</sup> day

of May, 2017.

Sandy Traynham

Nichelle D. Collins  
Notary Public for South Carolina  
My Commission Expires: 12/13/26