

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Certiorari to Greenville County  
Honorable Perry H. Gravely, Circuit Court Judge

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RONNIE C. SWOFFORD, JR.,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

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APPELLATE CASE NO. 2016 - 000508

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**MOTION FOR LEAVE TO AMEND THE PETITIONERS  
JOHNSON PRO SE RESPONSE FOR WRIT OF CERTIORARI**

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Comes now the Petitioner, respectfully moves this Honorable Court for Leave to Amend the Petitioners Johnson Pro Se Response for Writ of Certiorari pursuant to Rule 15, SCRPC.

The Petitioner submits this Motion to Amend in support of the allegations to illustrate the severe impact of the use of the "False Blood Evidence" allegedly on the Kitchen wall belonging to the Petitioner in theory of the Prosecution. SLED Forensics sent Test results to the Prosecution and Trial Counsel stating "NO BLOOD INDICATED" on the kitchen wall. SLED agent V. Gibson testified the Blood results were NEGATIVE for Blood (without mentioning the Petitioners name). Pages 2 and 3 of this motion will show the Jury heard the Term or Phrases referencing the Petitioners Blood (FALSE EVIDENCE). 1. (#) the amount of times the Term was used. 2. (PCR page - Line #) PCR Transcript. 3. (Person using term) while testifying or questioning. 4. (Term or Phrase) used to Identify the "False Evidence" in trial. Page 4 will show DNA/Tissue/Genetic Material was mentioned 26 times and 11 of those times those terms were ambiguous because those 11 times actually meant to be referenced to the Kitchen wall in which "No DNA/Tissue" were found but were phrased as DNA/Tissue/Genetic Material because Trial Counsel failed to oppose the State due to failing to investigate.

MAIL ROOM  
RECV MAIL

**\*\* TERMS or PHRASES USED REFERENCING "BLOOD" (FALSE EVIDENCE)**

<b>#</b>	<b>PCR - LINE</b>	<b>PERSON</b>	<b>TERM or PHRASE</b>
1	48 - 7	Solicitor Hodge	Splatter
2	49 - 16	Atty Johnston	Blood
3	49 - 18	" "	Blood
4	49 - 23	" "	Blood
5	133 - 4	Victim Wooten	Blood
6	133 - 14	Atty Johnston	Blood
7	133 - 24	" "	Blood
8	165 - 14	Solicitor Hodge	Stains
9	165 - 16	" "	Stains
10	165 - 21	" "	Reddish Look
11	172 - 23	Officer Derby	Blood
12	177 - 25	" "	Blood
13	184 - 23	" "	Blood
14	197 - 1	" "	Blood
15	243 - 11	Sgt. Weiner	Blood
16	243 - 14	Sgt. Weiner	Blood
17	260 - 10	SLED V. Gibson	Blood
18	260 - 13	" "	Blood
19	260 - 20	" "	Blood
20	261 - 9	" "	Blood *Negative Test results
21	277 - 6	SLED A. Hefney	Blood
22	277 - 10	" "	NO Appreciable Stain
23	278 - 17	" "	Blood
24	310 - 18	Detective Miller	Blood
25	310 - 19	" "	Blood Splattered on Wall
26	319 - 7	" "	Blood
27	319 - 18	" "	Blood
28	319 - 22	" "	Blood
29	559 - 12	Atty Johnston	Blood
30	559 - 16	" "	Blood
31	613 - 6	Solicitor Hodge	Splattered DNA
32	615 - 10	" "	Blood
33	615 - 17	" "	Blood
34	661 - 13	Detective Miller	Reddish

(CONTINUED)

#	PCR - LINE	PERSON	TERM or PHRASE
35	664 - 1	Atty Johnston	Blood
36	664 - 5	" "	Blood
37	664 - 20	" "	Blood
38	664 - 22	" "	Substances
39	664 - 24	Detective Miller	Blood
40	665 - 8	" "	Blood
41	666 - 8	Solicitor Hodge	Blood
42	666 - 9	" "	Blood
43	666 - 11	Detective Miller	Fresh Blood, the Red
44	666 - 13	" "	Blood is Red
45	666 - 15	" "	Fresh
46	669 - 12	Atty Johnston	Fresh
47	669 - 13	" "	Liquid State
48	678 - 19	" "	Blood
49	678 - 23	" "	Blood and it was Fresh
50	678 - 25	" "	Blood being Fresh
51	679 - 1	" "	Freshness
52	679 - 6	" "	Fresh
53	679 - 7	" "	Liquid State
54	679 - 8	" "	Liquid State
55	679 - 9	" "	Liquid State
56	679 - 10	" "	Dripping , Blood
57	679 - 11	" "	Fresh
58	689 - 7	" "	Blood
59	715 - 6	Solicitor Hodge	2 Items of Defendants DNA
60	715 - 10-11	" "	Tissue and Blood (both False)
61	715 - 15	" "	That Stuff is Fresh
62	715 - 16	" "	Tissue and Blood (both False)
63	715 - 21	" "	Fresh
64	723 - 12	" "	DNA evidence (Wall - False)
65	723 - 13-14	" "	DNA evidence (Wall - False)
66	726 - 7	" "	Direction of Spatter (Wall)
67	727 - 9	" "	Blood DNA

( END )

** TERMS or PHRASES USED REFERENCING DNA, TISSUE, GENETIC MATERIAL			
#	PCR - LINE	PERSON	TERM or PHRASE
1	48 - 8	Solicitor Hodge	Tissue Kitchen Wall (* FALSE)
2	49 - 18	Atty Johnston	Tissue
3	49 - 23	" "	Tissue
4	172 - 24	Officer Derby	Possible Tissue
5	178 - 10	" "	Suspected Tissue (* FALSE)
6	184 - 12	" "	Suspected Tissue
7	184 - 23	" "	Suspected Tissue
8	212 - 14-15	Sgt. Shaw	Tissue/Skin (* FALSE)
9	261 - 5	Solicitor Hodge	Yellowish Material (* FALSE)
10	277 - 6	SLED Hefney	Tissue (NO BLOOD)
11	277 - 10	" "	DNA Analysis
12	278 - 17	" "	Tissue (NO BLOOD)
13	282 - 13	" "	DNA/Hair (* FALSE)
14	287 - 11	Detective Miller	DNA
15	310 - 19	" "	Tissue on Wall (* FALSE)
16	319 - 7	" "	Tissue
17	664 - 24	" "	Tissue on Wall (* FALSE)
18	665 - 9	" "	Yellowish Tissue (* FALSE)
19	666 - 8-9	Solicitor Hodge	Tissue on Wall (* FALSE)
20	677 - 24-25	Atty Johnston	Genetic Material
21	678 - 4-18	" "	Genetic Material/DNA
22	683 - 18-23	" "	DNA
23	695 - 22	" "	DNA
24	715 - 6	Solicitor Hodge	Tissue (* FALSE)
25	723 - 12-24	" "	DNA (* FALSE)
26	724 - 5	" "	DNA

( END )



STATE OF SOUTH CAROLINA

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S.C. SUPREME COURT

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Ronnie C. Swofford, Jr.

PETITIONER

v.

State of South Carolina,

RESPONDENT

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CERTIFICATE OF SERVICE  
\_\_\_\_\_

The undersigned hereby certifies that a true copy of the\*Pro Se Response to Johnson Petition for Writ of Certiorari has been put into the U.S. mail postage prepaid to the following Authority

\*The Motion For Leave to Amend the Petitioners Johnson Pro Se Response, ATTN: Daniel Shearhouse, Clerk The Supreme Court of S.C. P.O. Box 11330 Columbia, S.C 29211

Ronnie C. Swofford, Jr.  
Ronnie C. Swofford, Jr.  
Petitioner, Pro Se

SUBSCRIBED AND SWORN TO before me on this 31 day of August, 2017.

J. Franklin  
Notary Public for South Carolina  
My Commission Expires: 12-16-2019

Dear Clerk,

9-1-17

Please send a Confirmation  
letter STATING your office  
Received the Motion For Leave  
to Amend. I'm Indigent, and  
could not get copies. Thank You  
Ronni Swafford Jr.