

**RECEIVED**

OCT 16 2017

(6)

QUESTIONS PRESENTED

SC Court of Appeals DID THE TRIAL COURT ERR BY DENYING  
DIRECTED VERDICT SCRCRIMP 19?

ARGUMENT

Yes the Lower Court Erred because actual possession is ~~whereas~~  
an object or substance on the person, However it is well-  
Established law in the State of South Carolina "The Due Process  
Clause" of the 5th and 14th Amendments and SC Constitution  
Article 1 Section 3. Requires that the prosecution prove beyond  
a reasonable doubt every element of a crime charged. In Re-  
Winship, 397 U.S. 358 at 364, 25 L.ED 2D 368, 90 S.CT 1068 (1970)  
Patterson V. Ny, 432 U.S. 197, at 215 53 L.ED 2D 28, 97 S.CT  
2319 (1977) In the Appellant's case in order to prove the crime  
of trafficking cocaine, there would have to have "proven beyond  
a reasonable doubt" and have given jury instructions on actual  
possession. The Constitution of S.C. require full jury  
instructions SC Constitution Article V Section 7.