

6

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY  
COURT OF GENERAL SESSIONS

THE HONORABLE R. MARKLEY DENNIS, JR. CIRCUIT COURT JUDGE

Indictment No. 2016-GS-10-01947, 2016-GS-10-01948, 2016-GS-10-01949,  
2017-GS-10-06457

The State,

Respondent,

v.

Alexander Reid,

Appellant,

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SC Court of Appeals

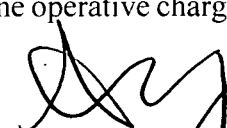
CORRECTED NOTICE OF INTENT TO APPEAL, CURING DEFICIENCY

Notice is hereby given that Alexander Reid hereby appeals to the South Carolina Court of Appeals from the Guilty Plea entered October 16, 2017 and to the rulings of the prior motions from the hearings held on October 12, 2017.

Appellant hereby provides an explanation showing there are issues which can be reviewed on appeal, pursuant to Rule 203(d)(1)(B)(iv) of the South Carolina Appellate Court Rules. On or about October 12, 2017, the Circuit Court ruled on three motions, at least one of which was dispositive: a motion to suppress an illegal automobile stop and search (Exhibit 1); a motion to obtain the name of a confidential informant (Exhibit 2); and a motion to suppress a search of a residence (Exhibit 3). On all three motions the Circuit Court ruled against the Appellant. The clearly dispositive motion was to suppress the search of the residence where cocaine was found. This search was the only way the authorities would have encountered the cocaine; there was no other avenue to this discovery. Therefore, pursuant to the Fruit of the Poisonous Tree Doctrine, had the search been suppressed the evidence located therein would have been inadmissible, and the operative charge, Trafficking Third Offense, would not have been prosecutable.

November 2, 2017  
Charleston, SC

Other Counsel of Record:  
Charles W. Patrick III, Esq.  
Assistant Solicitor: Ninth Judicial Circuit

  
\_\_\_\_\_  
Aaron C. Mayer, SC Bar 81261  
2000 Sam Rittenberg Blvd., Ste. 2011  
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Attorney for Appellant

Charleston County Office  
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THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY  
COURT OF GENERAL SESSIONS

THE HONORABLE R. MARKLEY DENNIS, JR. CIRCUIT COURT JUDGE

Indictment No. 2016-GS-10-01947, 2016-GS-10-01948, 2016-GS-10-01949,  
2017-GS-10-06457

The State,

Respondent,

v.

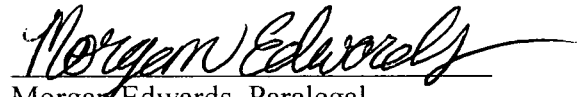
Alexander Reid,

Appellant,

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NOV 03 2017  
SC Court of Appeals

PROOF OF SERVICE

I, Morgan Edwards, a paralegal in the office of the attorney for the Appellant, certify that I have served the within Notice of Intent to Appeal, Curing Deficiency on November 2, 2017 by mailing, postage pre-paid, a copy of the same to Julie Armstrong, Clerk of Court, 100 Broad Street, Ste. 106, Charleston, South Carolina, 29401, Charles W. Patrick III, Esq., Assistant Solicitor for the Ninth Judicial Circuit, 101 Meeting Street, Charleston, South Carolina, 29401, and South Carolina Attorney General Alan Wilson, Rembert Dennis Building, 1000 Assembly St., Room 519, Columbia South Carolina, 29201.

  
Morgan Edwards, Paralegal  
Mayer Law Practice

This 2<sup>nd</sup> day of November, 2017.  
Charleston, South Carolina



*Of the People, For the People*

Aaron Mayer, Attorney  
Mayer Law Practice  
2000 Sam Rittenberg Blvd., Ste. 2011  
Charleston, SC 29407  
aaron@mayerlawpractice.com

November 2, 2017

The Honorable Jenny Abbott Kitchings  
Clerk, The South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**  
NOV 03 2017  
SC Court of Appeals

Re: Alexander Reid  
Case: State v. Alexander Reid  
Case No.: 2015A1010204047, 48, 51, 50 (x2), 53

Dear Ms. Kitchings:

Enclosed is a Corrected Notice of Intent to Appeal, Curing Deficiency in the above-referenced matter for filing. Please note that enclosed with this Corrected Notice of Intent to Appeal, Curing Deficiency are three (3) Exhibits and four (4) Indictments with the corresponding Sentence Sheet.

By copy of this letter, I am also serving Attorney General, Alan M. Wilson and Assistant Solicitor Charles W. Patrick III, Esq. and Charleston County Clerk of Court Julie Armstrong.

Call me anytime with any questions at all.

With kindest regards, I am,

Sincerely,

Aaron C. Mayer  
Licensed in: South Carolina  
North Carolina  
Florida

ACM/mle  
Enclosure

cc: Alan M. Wilson, Attorney General  
Charles W. Patrick III, Assistant Solicitor  
Julie Armstrong, Charleston County Clerk of Court

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

IN THE COURT OF GENERAL SESSIONS  
MOTION COVERSHEET

WARRANT/TICKET/  
INDICTMENT #'s

2015 A1010 204847  
48  
50  
51  
53

STATE OF SOUTH CAROLINA

ALEXANDER REED  
-vs-  
DEFENDANT

Solicitor:  
Mark Bondone, Bar No. 65265  
Address:  
101 Meeting Str. Ste 400  
Phone: 843-958-1900  
E-mail:

Defendant's Attorney:  
Amor Mayer, Bar No. 81261  
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2000 Sam Rittenbire #2011  
Phone: (843) 275-7040  
E-mail: amor@mayerlawpractice.com

- MOTION HEARING REQUESTED
- FORM MOTION, NO HEARING REQUESTED
- PROPOSED ORDER/CONSENT ORDER

SECTION I: Hearing Information

Nature of Motion: Suppression

Estimated Time Needed: 1 hour

Court Reporter Needed:  YES /  NO

SECTION II: Motion/Order Type

- Written motion attached
- Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.

[Signature]  
Signature of  Solicitor  Attorney for Defendant

8/25/17  
Date submitted

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NOV 03 2017

SC Court of Appeals

FILED  
2017 AUG 25 AM 10:01  
JULIE J. ARMSTRONG  
CLERK OF COURT  
MA

STATE OF SOUTH CAROLINA )  
COUNTY OF CHARLESTON )

**FILED**

GENERAL SESSIONS COURT  
NINTH JUDICIAL CIRCUIT

2017 AUG 25 AM 10:00

Case No.: 2015A1010204047, 48, 51, 50 (x2), 53

STATE OF SOUTH CAROLINA )  
Plaintiff, )

JULIE J. ARMSTRONG  
CLERK OF COURT

*MMH*

Charge: Trafficking Cocaine

**RECEIVED**

NOV 03 2017

SC Court of Appeals

Vs. )

ALEXANDER REID )  
Defendant. )

**MOTION TO SUPPRESS  
UNCONSTITUTIONAL STOP AND SEARCH**

INTRODUCTION

NOW COMES the defendant, Alexander Reid, by and through his counsel, moves this Court pursuant to Rule 6 of the South Carolina Rules of Criminal Procedure, for an Order suppressing the evidence in this matter regarding the facts and circumstances of the vehicle search and subsequent house search in this case. Reid was detained roadside for about two hours with no probable cause, no search warrant, and no arrest warrant, while an officer hurriedly cobbled together an affidavit based on an undisclosed informant, whose name still has not been provided, in violation of Rule 5, Brady, and two subpoenas (now the subject of a separate motion to compel).

FACTS

The arresting officer, Officer Burke, stopped Reid's Infinity after spotting him from the opposite direction of travel, making a U-turn and weaving through medium traffic to get behind Reid. Not only was Reid not speeding, but Officer Burke was not in any position to determine that: Officer Burke used no electronic speed detection device; a visual determination from the opposite direction of travel was not achievable because Reid was traveling with the speed of the traffic in his own direction; and Officer Burke did not tail Reid long-enough to match his speed to determine Reid's speed of travel. The real reason for the stop is that Officer Burke has targeted Reid without probable cause, and against the tenants of our South Carolina Constitution and the U.S. Constitution.

At the side of the road, the officer immediately asked Reid to exit the vehicle. Reid, an African American, asked the officer why he needed to get out of the car, and the officer began getting upset, so, given the climate in the country, Reid just got out of the car before the officer escalated things further. The officer then informed Reid, "I'm gonna search your car." Reid did not consent to the search. A K-9 officer was called, but before the K-9 arrived, police searched Reid's vehicle – without consent, and without probable cause. At that time, Officer Blake removed some U.S. currency from the car's center console.

When the K-9 officer arrived, the police told Reid that the dog signaled on the hood/front of the Infinity. The officers then popped the hood and removed several pieces of engine hardware. They found no contraband and did not properly replace the hardware. When that second search of the vehicle yielded no results, the officers then scrambled and typed up a bogus affidavit to search a residence that is not and never has been Reid's – all while continuing to detain Reid on the side of Hwy. 17 in Mt. Pleasant.

Officers continued to detain Reid while they typed up an affidavit to search his friend's home, claiming it was his. Reid was kept on the side of the road while the officers alleged in the affidavit that a C.I. said drugs were sold from Reid's friend's house; he was kept there while an officer went to a magistrate and, using an erroneous affidavit, obtained the signature of a magistrate judge; and Reid continued to be held while officers went to the friend's house and searched for contraband. Only after all of these machinations was Reid arrested.

### **ARGUMENT**

Reid never should have been arrested, and the results of the search should be suppressed.

#### **I. The Traffic Stop Was Improper, Unconstitutional**

When Reid was pulled over, the police lacked the probable cause required as a precondition to initiating a traffic stop. A traffic stop is "subject to the constitutional imperative that it not be 'unreasonable' under the circumstances." State v. Pichardo, 367 S.C. 84, 97, 623 S.E.2d 840, 847 (Ct. App. 2005) (quoting Wren v. United States, 571 U.S. 806, 810 (1996)).

Probably cause for a traffic stop exists when there is an articulable violation of a law. "Probable cause is defined as a good faith belief that a person is guilty of a crime when this belief rests on such grounds as would induce an ordinarily prudent and cautious person, under the circumstances, to believe likewise." State v. Blassingame, 338 S.C. 240, 250, 525 S.E.2d 535, 540 (Ct. App. 1999) (quoting Wortman v. City of Spartanburg, 310 S.C. 1, 425 S.E.2d 18 (1992)). Such grounds must be factual. "In determining the presence of probable cause for arrest, the probability cannot be technical, but must be factual and practical considerations of everyday life on which reasonable, prudent and cautious men, not legal technicians, act." Gist v. Berkeley County Sheriff's Dep't, 336 S.C. 611, 521 S.E.2d 163 (Ct.App.1999).

Reasonable suspicion is a more narrow, restricting standard than probable cause. "A police officer may stop and briefly detain and question a person for investigative purposes, without treading upon his Fourth Amendment rights, when the officer has a reasonable suspicion supported by articulable facts, short of probable cause for arrest, that the person is involved in criminal activity." State v. Taylor, 388 S.C. 101, 109, 694 S.E.2d 60, 64 (Ct. App. 2010), reh'g denied (June 24, 2010) (quoting State v. Blassingame, 338 S.C. 240, 248, 525 S.E.2d 535, 539 (Ct.App.1999)); *see also* U.S. v. Sokolow, 490 U.S. 1, 7, 109 S.Ct. 1581, 104 L.Ed.2d 1 (1989); Terry v. Ohio, 392 U.S. 1, 30, 88 S.Ct. 1868, 20 L.Ed.2d 889 (1968).

Here, Reid was operating a recent-model Infinity sedan in perfect repair. The officer claimed that he stopped the vehicle due to speeding. However, Reid and his passenger both state that he was not speeding. In this case, Reid and his passenger are more credible than the officer. Consequently, the stop was unreasonable and violated the Reid's Fourth Amendment rights.

Terry governs the limits of police conduct during a traffic stop. United States v. Rusher, 966 F.2d 868, 875 (4th Cir. 1992). The relevant inquiry is "whether the officer's action was justified at its inception." Terry at 20. Here, because Reid operated his vehicle properly within the speed limit, the officer's stop of Reid's Infinity was unconstitutional.

In the absence of speeding, the officer did not have probable cause to stop Reid; the Constitution requires that subsequent evidence found cannot be used against Reid. "When the initial traffic stop is illegal, the subsequent evidence found is excluded from trial under the 'fruit of the poisonous tree doctrine.'" United States v. Rusher, 966 F.2d 868, 875 (4th Cir. 1992); *see, e.g.*, Wong Sun v. United States, 371 U.S. 471, 484, 83 S.Ct. 407, 415, 9 L.Ed.2d 441 (1963). Here, the subsequent evidence found – personal use amounts of cocaine – was obtained only as a direct result of the unconstitutional stop, and should be suppressed under the fruit of the poisonous tree doctrine.

## **II. Officer Blake Never Obtained a Warrant, Nor Probable Cause to Search Reid's Car**

Warrantless searches and seizures are presumptively unreasonable. The Fourth Amendment to the U.S. Constitution is incorporated through the Due Process Clause of the Fourteenth Amendment and thus applies to state action. *See Mapp v. Ohio*, 367 U.S. 643 (1961). The Fourth Amendment provides:

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

U.S. Const. amend IV. The purpose of the Fourth Amendment is to safeguard individual privacy against government invasions. *See Michigan v. Tyler*, 436 U.S. 499, 504 (1978). Under the Fourth Amendment rule, "a search of private property is 'unreasonable' unless it has been authorized by a valid search warrant." Camera v. Municipal Court, 387 U.S. 523, 528-29 (1967). The "entry" of a government actor into a home is analyzed the same as a "search." *See Georgia v. Randolph*, 547 U.S. 103, 109 (2006). A "jealously and carefully drawn" exception to the Fourth Amendment rule "recognizes the validity of searches with the voluntary consent of an individual possessing authority." *Id.* A prosecutor has the burden of proving that consent "was, in fact, freely and voluntarily given." Bumper v. North Carolina, 391 U.S. 543, 548 (1968);

State v. Middleton, 268 S.C. 152 (1977). “This burden cannot be discharged by showing no more than acquiescence to a claim of lawful authority.” Bumper at 549.

The colloquy between the officer and Reid, witnessed by a third-party, and the great lengths that Officer Blake went through to gin-up a basis to arrest Reid, conclusively demonstrate that the reason for the stop was not speeding. Office Blake had no other justification to search the Infinity, and should not have detained Reid on the side of the road.

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### **III. Detention of Reid During Traffic Stop Was Unconstitutional**

Reid should have been released from the seizure by Officer Burke prior to the K-9 search of his vehicle. Although prior Supreme Court precedent held that a dog sniff during a traffic stop did not violate the Fourth Amendment, the question in Rodriguez v. United States was whether the Fourth Amendment tolerates a dog sniff conducted after completion of a traffic stop. Rodriguez v. United States, 135 S. Ct. 1609, 191 L. Ed. 2d 492, (2015) (holding a police stop exceeding the time needed to handle the matter for which the stop was made violated the United States Constitution’s shield against unreasonable seizures).

In Rodriguez, a human officer, with a K-9 officer, stopped Rodriguez for driving on a highway shoulder. After the human officer attended to everything relating to the stop, including, *inter alia*, checking the driver's licenses of Rodriguez and his passenger and issuing a warning for the traffic offense, he asked Rodriguez for permission to walk his dog around the vehicle. When Rodriguez refused, the officer detained him until a second officer arrived. The first officer then retrieved his dog, who alerted to the presence of drugs in the vehicle. The ensuing search revealed methamphetamine. Seven or eight minutes elapsed from the time Struble issued the written warning until the dog alerted.

Here, the traffic stop almost immediately ceased to pertain to any alleged speeding by Reid, and quickly morphed into this free-for-all, keep-Reid-by-the-roadside, city wide endeavor by Officer Burke. Much more than eight minutes elapsed between the time any attention was given by the officer to the speeding allegation/investigation, and when the K-9 officer conducted the dog sniff of the vehicle. After the K-9 officer and the subsequent search of Reid's vehicle found no contraband, the illegal stop continued with Reid still detained/seized by Officer Burke for no reason whatsoever connected to the speeding allegation.

There is no case law that supports Officer Burke's subsequent continued seizure of Reid while officers scrambled to draft a faulty search warrant – not an arrest warrant – for a home he did not own. But for his stop for speeding, no such search warrant would have issued at that time. Consequently, the poison fruit of that search warrant should be suppressed.

**CONCLUSION**

For the foregoing reasons, Reid respectfully requests that this Court suppress the evidence found subsequent to the illegal stop and continued seizure of his person and his vehicle.

Sincerely Submitted,



AARON C. MAYER, ESQ  
S.C. Bar # 81261  
2000 Sam Rittenberg Blvd., Ste. 201  
Charleston, SC 29407  
T: (843) 225-7240  
F: 888-446-3963

2017 AUG 25 AM 10:00  
JAMES M. STRONG  
CLERK OF COURT

FILED

Charleston, SC  
August 24, 2017

# EXHIBIT 2

STATE OF SOUTH CAROLINA )  
COUNTY OF CHARLESTON )

COURT OF GENERAL SESSIONS  
NINTH JUDICIAL CIRCUIT

CASE NO.: 2015A1010204047, 48, 51, 50 (x2), 53

STATE OF SOUTH CAROLINA )  
Plaintiff )

Charge(s): POSS OF A FIREARM DURING  
A COMM. OF A VIOLENT CRIME,  
UNLAWFUL CONDUCT TOWARDS A  
CHILD X2 TRAFFICKING COCAINE, PWID  
COCAINE PROX. TO A SCHOOL,  
UNLAWFUL POSS OF A FIREARM BY A  
PERSON CONVICTED OF A VIOLENT  
OFFENSE

Vs.

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MOTION TO OBTAIN NAME AND FILE OF C.I.

ALEXANDER REID  
Defendant

NOV 03 2017

Court of Appeals

TO: MARK BOURDON, ASSISTANT SOLICITOR, NINTH JUDICIAL CIRCUIT:

The Defendant, Alexander Reid, by his undersigned attorney, will move before the Presiding Judge, Court of General Sessions, Ninth Judicial Circuit, Charleston, South Carolina, for the State to reveal the identity, contact information and file for the confidential witness in this case. In support of this motion, the Defendant shows the following:

1. The Defendant is currently charged with Trafficking Cocaine.
2. The alleged probable cause for a search warrant is search of a trash can supposedly corroborated by an unnamed informant.
3. The confidential informant information is necessary for the Defense to fight the charges.
4. The State alleges the confidential informant has knowledge about the Defendant's relevant activities.

BY  
CLERK OF COURT  
2015 JUL 15 11:20

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5. Counsel for the Defendant is in need of this witness information in order to adequately prepare Defendant's case, particularly with regard to exploring and developing any bias, motive, and impeachment material as it relates to the confidential informant.

### ARGUMENT

Both the United States Supreme Court and the South Carolina courts have held that the State must disclose an informant's identity in cases in which the informant actively participated and/or was a percipient witness to the underlying act or transaction which serves as a basis for prosecution. Roviaro v. United States, 353 U.S. 53 (1957); State v. Wright, 322 S.C. 484, 488 (1996). The State must reveal the identity of an informant if the Defendant demonstrates that the identity of the informant would be helpful to the Defendant's defense. United States v. Sanchez, 908 F.2d 1443 (9<sup>th</sup> Cir. 1990).

Here, the ability to subpoena Edwin Pearsey, is of crucial importance in that the State's case appears to rest entirely on the actions of this confidential informant. According to the State's file, the confidential informant allegedly knows the Defendant and identified him at the time of the transaction. Thus, the best evidence of the state is the confidential informant, not the blurry, inaudible video that the police collected after the alleged transaction.

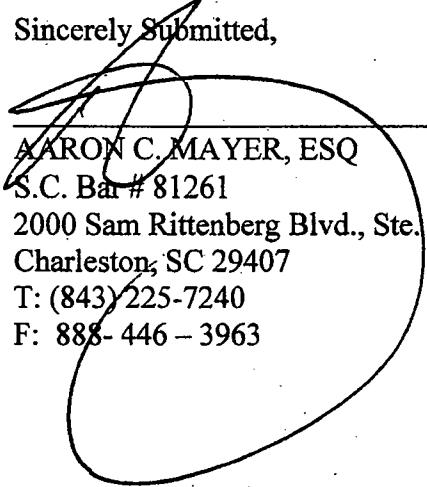
Additionally, Mr. Pearsey made at least two stops between leaving the police officers who loosely supervised the alleged transaction, and the Defendant requires the opportunity to examine Mr. Pearsey about what he did on those stops – specifically, whether it was on one of those stops at which Mr. Pearsey got the alleged marijuana that he returned to the police later. An examination of Mr. Pearsey may reveal that he got the marijuana during a stop that did not

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CLERK OF COURT

involve the Defendant. In short, the ability to examine the informant would likely help the Defendant's case.

For the reasons stated above, the undersigned requests that the confidential informant's identity, contact information and file be revealed to the Defendant's counsel.

Sincerely Submitted,

  
\_\_\_\_\_  
AARON C. MAYER, ESQ  
S.C. Bar # 81261  
2000 Sam Rittenberg Blvd., Ste. 2011  
Charleston, SC 29407  
T: (843) 225-7240  
F: 888-446-3963

Charleston, SC  
July 14, 2016

FILED  
2016 JUL 15 AM 11:20  
JULIE A. ANSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

# EXHIBIT 3

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

IN THE COURT OF GENERAL SESSIONS  
MOTION COVERSHEET

WARRANT/TICKET/  
INDICTMENT #'s

2015A1010204047-51  
2015A1010204053

STATE OF SOUTH CAROLINA

-vs-

ALEXANDER REID  
DEFENDANT

Solicitor: Stephanie Lyden, Bar No. \_\_\_\_\_  
Address: \_\_\_\_\_  
Phone: \_\_\_\_\_  
E-mail: \_\_\_\_\_

Defendant's Attorney: Ammon M. Lyden, Bar No. 81261  
Address: 7000 Sun Rittendon Blvd  
Phone: (843) 225-7240 #2011  
E-mail: ammon@ammonlawfirm.com

- MOTION HEARING REQUESTED
- FORM MOTION, NO HEARING REQUESTED

**SECTION I: Hearing Information**

Nature of Motion: Support of Order  
Estimated Time Needed: 1 hour Court Reporter Needed:  YES /  NO

**SECTION II: Motion/Order Type**

- Written motion attached
- Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.

[Signature]  
Signature of  Solicitor  Attorney for Defendant

10/10/17  
Date submitted  
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CLERK OF COURT

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NOV 03 2017

SC Court of Appeals

STATE OF SOUTH CAROLINA )  
COUNTY OF CHARLESTON )

GENERAL SESSIONS COURT  
NINTH JUDICIAL CIRCUIT

Case No.: 2015A1010204047, - 51, 2015A1010204053

STATE OF SOUTH CAROLINA )  
Plaintiff, )

Charge: Trafficking Cocaine

Vs. )

ALEXANDER REID )  
Defendant. )

MOTION TO SUPPRESS  
SEARCH OF HOUSE

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NOV 03 2017  
SC Court of Appeals  
FILED  
OCT 10 PM 3:19

INTRODUCTION

NOW COMES the defendant, Alexander Reid, by and through his counsel, moves this Court pursuant to Rule 6 of the South Carolina Rules of Criminal Procedure, for an Order suppressing the evidence in this matter regarding the facts and circumstances of the search of 2439 Old Georgetown Rd. Mount Pleasant, a house search, in this case. The Mount Pleasant community has documented multiple repeated misrepresentations by the officer who swore out the search warrants. According to that officer, the search of the house was allegedly based on trash pulls from a garbage can shared between multiple properties, and an undisclosed informant.

Probably cause for a search exists when there is an articulable violation of a law. "Probable cause is defined as a good faith belief that a person is guilty of a crime when this belief rests on such grounds as would induce an ordinarily prudent and cautious person, under the circumstances, to believe likewise." State v. Blassingame, 338 S.C. 240, 250, 525 S.E.2d 535, 540 (Ct. App. 1999) (quoting Wortman v. City of Spartanburg, 310 S.C. 1, 425 S.E.2d 18 (1992)). **Such grounds must be factual.** "In determining the presence of probable cause... the probability cannot be technical, but must be factual and practical considerations of everyday life on which reasonable, prudent and cautious men, not legal technicians, act." Gist v. Berkeley County Sheriff's Dep't, 336 S.C. 611, 521 S.E.2d 163 (Ct.App.1999).

Here, a Mount Pleasant petition to stop Officer Blake from racially profiling and spreading false rumors – often of cooperation with the police, a dangerous accusation – garnered about 400 signatures,

and the attention of at least one TV news channel. Among the allegations by signatories to the petition were that Officer Blake commonly claimed that an informant said a person Blake initiated contact with was dealing drugs. Apparently, Officer Blake made this claim as his reason for contacting some individuals, but those contacted knew full well they were innocent. Over the course of time as members of the community talked with one another, they pieced together this component of Officer Blake modus operandi.

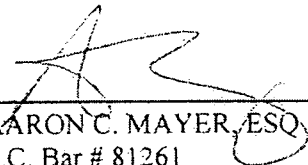
The inaccuracies, and to categorize them most kindly, the confusing representations set forth in the affidavits to the search warrants for the Old Georgetown Road house render the search based thereon unconstitutional.

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2017 OCT 10 PM 3:19  
CLERK OF COURT  
CHARLESTON, SC

**CONCLUSION**

For the foregoing reasons, Reid respectfully requests that this court suppress the evidence found subsequent to the illegal search the Old Georgetown Road house.

Sincerely Submitted,

  
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Charleston, SC  
October 5, 2017