

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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S.C. SUPREME COURT

—————  
Certiorari to Sumter County

Brooks P. Goldsmith, Circuit Court Judge

—————  
JERON ALONDO COOK,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO 2017-000816

—————  
SUPPLEMENTAL APPENDIX  
—————

SUSAN B. HACKETT  
Appellate Defender

ALAN WILSON  
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South Carolina Commission on Indigent  
Defense  
Division of Appellate Defense  
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ATTORNEY FOR PETITIONER

ATTORNEYS FOR RESPONDENT

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STATE OF SOUTH CAROLINA ~~FILED~~ IN THE COURT OF COMMON PLEAS

COUNTY OF SUMTER 2014 FEB 13 } PM 3:05 DOCKET NO.: 2014-CP-43-0644

JERON A. COOK, 337103, ~~CLERK OF COURT~~  
Applicant, SUMTER COUNTY, S.C.

v.

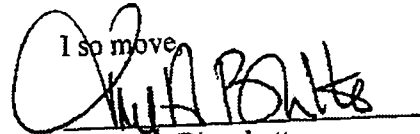
STATE OF SOUTH CAROLINA, )  
Respondent, )

AMENDMENT TO APPLICATION  
FOR POST CONVICTION RELIEF

This matter comes before the Court by way of an Application for Post Conviction Relief filed on April 3, 2014. The State submitted a Return on November 14, 2014. Applicant would move to amend his claims of ineffective assistance of trial and appellate counsel as follows:

1. Ineffective assistance of trial counsel for failure to conduct a reasonable investigation prior to trial.
2. Ineffective assistance of trial counsel for failure to discuss and inform Applicant of all available defenses and reach an informed trial strategy with Applicant prior to trial.
3. Ineffective assistance of trial counsel for failure to discuss the implications (i.e. establishing the elements of manslaughter) his testimony could result in at trial.
4. Ineffective assistance of trial counsel for failure to utilize additional witnesses at trial to corroborate Defendant's testimony, support the defense argument, or establish additional defenses and/or reasonable doubt.
5. Ineffective assistance of counsel for failure to object to the Court's opening comments to the jury regarding a true and just verdict. Transcript p. 51, lns. 8-10. See State v. Daniels, 401 S.C. 251, 737 S.E.2d 473 (2012).
6. Ineffective assistance of counsel for failure to fully cross-examine and impeach the State's witnesses.
7. Ineffective assistance of trial counsel for failure to object to the jury being charged on voluntary manslaughter and/or failure to preserve the matter for appeal.

8. Ineffective assistance of trial counsel for failure to utilize the ten day time period offered by the court to file a post trial motion and for electing to only proceed with a motion for a new trial immediately after sentencing.
9. Ineffective assistance of trial counsel due to a conflict of interest: Prior to trial Applicant was advised by counsel that it would present a conflict for him to proceed with representing Applicant due to his campaign for Solicitor that resulted in his election later that year, yet he continued with representation without Applicant waiving the conflict.
10. Pursuant to Rule 15(b), SCRCP, Applicant would move to amend to conform to the evidence and testimony presented at the evidentiary hearing.
11. Ineffective assistance of appellate counsel for failure to raise all meritorious issues on appeal.

I so move,  


Tricia A. Blanchette  
PO Box 12725  
Columbia, SC 29211  
Attorney for Applicant

February 10, 2016  
Columbia, SC

STATE OF SOUTH CAROLINA )  
COUNTY OF SUMTER )

IN THE COURT OF COMMON PLEAS  
THIRD JUDICIAL CIRCUIT

Jeron A .Cook, #337103, )  
Applicant, )

2014-CP-43-0644

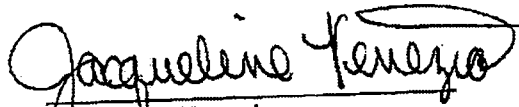
v. )  
CAMPBELL )  
CLERK OF COURT )  
SUMTER COUNTY, S.C. )

**CERTIFICATE OF SERVICE**

State of South Carolina, )  
Respondent. )

I, Jacqueline Venezia, Law Clerk to Tricia A. Blanchette, Esq., hereby certify that I placed in the mail this 10th day of February, 2016, a copy of an Amendment to Application for Post Conviction Relief, to Daniel Gourley of the Attorney General's Office, at:

Office of the Attorney General  
Att: Daniel Gourley, Ast. AG  
PCR Division  
PO Box 11549  
Columbia, SC 29211



Jacqueline Venezia  
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Columbia, SC 29211  
(803) 988-0008  
Law Clerk

February 10, 2016