

State of South Carolina  
County of Spartanburg  
Shannon M. Lancaster  
SEDC# 341546  
VS

In the Court of APPEALS  
Case no# 2017-000908  
Ind# 2016GS4205068  
MOTION TO SUPPRESS  
(§ 17-30-110)

The State of S.C.  
Respondent

RECEIVED  
OCT 10 2017  
SC Court of Appeals

Now comes the above captioned appellant who would move for this court to suppress all evidence garnered from an illegal controlled buy by Investigator James Ruane (badge# 0890) (Buy Notes # 16040895)

To wit, Mr. Ruane, in violation of § 17-30-70, did cause the appellant to be charged with Trafficking specifically § 44-53-375(c). It would appear that the extent of Mr. Ruane's violations in this matter should extend the scope to include but not limited to § 17-30-20 through § 17-30-145, and even § 23-1-215, since James Ruane drove me through multiple jurisdictions in the search for the drugs he wanted.

Further more, I was not aware, nor did my attorney make me privy to Title 17, Chapter 30 and/or the exclusive remedy for the violation of this chapter.

In addition due to Investigator James Ruane's breach of proper procedure and/or protocol, as well as illegal actions, any and all evidence produced in this matter by this investigator

(cont.)

should be suppressed and excluded from this case.

Shannon Lancaster  
Shannon M Lancaster Id# 341546  
Pro-se litigant

Sworn and Subscribed before me  
the 5th day of October 2017

Jamara Conwell  
Notary Public

My Commission Expires  
September 25, 2023

my commission expires

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OCT 05 2017

P.C.I. MAILROOM

Certificate of Service

I Shannon Lancaster hereby certify that on this            day of October 2017, that I served a Motion to Suppress, Indictment #2016GIS4205068 to the Clerk of Court, through the United States postal service and Perry Correctional legal Mail System.

1) Clerk of Court  
P.O. Box 11629  
Columbia, SC 29211

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OCT 10 2017

SC Court of Appeals

Subscribed and Sworn to before me  
This 5th day of October 2017  
Notary: Tamarca Conwell  
Expires: My Commission Expires  
September 25, 2023

S/ Shannon Lancaster  
Shannon Lancaster

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OCT 05 2017

P.C.I. MAILROOM

Shannon M. Lancaster #341546  
Perry Cor. Inst. / Q2A-122  
430 Dahlawn road  
Pelzer, S.C. 29669  
(page 1 of 1)

Ms. Jenny A. Kitchings / Clerk  
Clerk of the S.C. Court of Appeals  
P.O. Box 11629  
Columbia, S.C. 29211

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OCT 10 2017

SC Court of Appeals

October 05, 2017

IN RE: I need you to file motion to suppress, pursuant to  
§ 17-30-110, in the record for Ind#. 2016-GS-4205068

Dear Ms. Kitchings,

I am writing in concern of the above  
referenced matter.

In which, I would like for you to  
file the enclosed motion to suppress in the  
courts and return a clock stamped copy for my  
files.

In addition, I would like to "Thank  
You" in advance for all of your time, help, and  
consideration in these endeavors on my behalf.

I look forward to hearing from  
you soon!

Sincerely,  
Shannon Lancaster

CC Chief Justice  
S.C. Court of Appeals  
my files

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OCT 10 2007

SC Court of Appeals

IN THE COURT OF APPEALS  
CASE NO. 2007-00908  
IND# 20165940505068  
MOTION TO SUPPRESS  
(§17-30-110)

STATE OF SOUTH CAROLINA  
COUNTY OF SPARTANBURG  
vs.  
STANNDON M. LANCASTER,  
SCOT# 341546,  
THE STATE OF S.C.  
Respondent.

Now comes the above captioned appellant who would move for this court to suppress all evidence gathered from an illegal controlled buy by Investigator James Ruane (badge #0890) (Buy Notes # 16040895) To wit, Mr. Ruane, in violation of §17-30-70, did cause the appellant to be charged with Trafficking, specifically §44-53-375(c). It is said that the extent of Mr. Ruane's violations in this matter should extend the scope to include but not limited to §17-30-20 through §17-30-145, and even §23-1-215, since he drove me through multiple jurisdictions in the search for the drugs he wanted.

Further more, I was not aware, nor did my attorney make me privy to the 17, chapter 30 and/or the exclusive remedy for the violation of this chapter. (cont.)

(1)

In addition, due to inv. Ruane's breach of proper procedure and/or protocol, as well as illegal actions, any and all evidence produced in this matter by this investigator should be suppressed and excluded from this case.

Shannon Lancaster  
Shannon M. Lancaster; ID# 341546  
pro-se litigant.

Sworn and Subscribed before me  
the 5<sup>th</sup> day of October, 2017

Tamara Conwell  
notary Public

My Commission Expires  
September 25, 2023  
my Commission expires:

**RECEIVED**

OCT 05 2017

P.C.I. MAILROOM

Chief Justice of the S.C.  
Court of Appeals/Reviewing  
Authority  
105 Sumter St./PO Box 11629  
Columbia, S.C. 29211

Shannon M. Lancaster #341546  
Perry Corr. Inst./Q2A-122  
430 Oaklawn road  
Pelzer, S.C. 29669

(Page 1 of 4) RECEIVED  
OCT 10 2017  
SC Court of Appeals  
Ex Parte'

October 5, 2017

In Re: Shannon M. Lancaster, Ind. # 2016 GSA 205068;  
Title 17, Chapter 30 / Inception of wire, Electronic or oral  
Communications (17-30-110; motion to suppress/exclusive  
remedy.) Ex Parte'

Your Honor,

I am writing in concern of the above  
referenced matters.

To begin with, I was introduced to  
the narcotics investigator, Mr. James Ruane  
(badge # 0890) by a friend of 11 years, Mr.  
David Brent Goode, that advised me that  
he was his boss, whom was the business  
owner. Inv. Ruane, as inducement to persuade  
me to assist him in finding drugs offered  
me a legitimate job with his company  
renovating homes to do so. After agreeing  
to his proposition, I got into his car,  
and we searched for four hours to find  
the drugs he wanted. This search  
spanned multiple jurisdictions.

After being arrested, I spent  
(1)

my entire savings (\$9000.00) to hire Mr. Ricky Harris (esq.) to represent me in this case. Whom assured me he was the individual for the job with 27 years of experience. And advised my family that I would get no more than (5) five years.

Subsequently, I both verbally, and by mail requested my Discovery materials (Rule 5) from my attorney. After (6) six months of unseccessful attempts, I finally decided to lodge a complaint with the Office of Disciplinary Counsel to document his actions and/or lack thereof (file # 16-DE-L-1282)

Shortly thereafter, I was taken to a hearing by my attorney before the Hon. Durham Cole. With my attorney, assistant prosecutor and Judge all present, my attorney advised that I did not intend to accept the (18) eighteen year plead because I was not guilty of the charge. To which Judge Cole responded that he wanted my attorney and the prosecutor to be sure that I was brought before him for trial. Which I took as a threat because he appeared to be saying that he would

Use the influence of his position to ensure a conviction and of maximum sentence. This scared me to silence. And the record of court would reveal this action. This was extortion and intimidation from a very high and powerful place.

Furthermore, I expected my attorney to represent me to the best of his ability. However, he never advised me and/or the court of the neglected procedure [REDACTED] by the narcotics investigator in this case. (Buy notes #16040895) This lack of action was a action in and of itself. And, he advised me that he was tired of trying to negotiate with the assistant prosecutor, Mr. James E Hunter (esq), because he was not going to entertain any reasonable deal due to a personal agenda he had with me. Thus, here again, I had no choice but to document this impropriety by the assistant prosecutor with the Office of Disciplinary Counsel. (File case # 17-DE-L-0054)

Nevertheless, right before going into the court room for trial my attorney once again coerced me by having an argument with me saying, I better take the damn

plead or I was going down because he did not think he was the right man to defend me, i.e. I was on my own. I also documented this action with the Office of Disciplinary Counsel. (File # 17-DE-L-0361).

In addition, any help that you could provide with in this endeavor would be of a tremendous assistance to me.

And, as always, all of your time, and consideration on my behalf is greatly appreciated by me!

I look forward to hearing from you soon!

Sincerely,  
Shannon M Lancaster

cc. my file

## Buy Notes for Case #16040895

14:29—Investigator Ruane picked up Shannon Lancaster at 105 Saddle Drive, Gaffney, SC

14:24—Investigator Ruane and Shannon Lancaster leave 105 Saddle Drive, Gaffney, SC

15:05—pulled in trailer park in Wellford, SC. SC Tag MBT320 Jetta Volks parked at trailer. 1<sup>st</sup> trailer on right. Expedition with paper tag also parked at trailer

15:08—Investigator Ruane left Shannon Lancaster at trailer with buy money and went to Dollar General in Wellford and parked

15:28—Investigator Ruane returned to trailer to pick up Shannon Lancaster

15:40—Investigator Ruane and Shannon Lancaster left trailer. Shannon Lancaster informed Investigator Ruane that it would be about 1 hour before the methamphetamine would be at the trailer. Investigator Ruane and Shannon Lancaster decided to get something to eat in the area to wait for the methamphetamine.

15:43—Investigator Ruane and Shannon Lancaster went to Spinx/Burger King at Hwy 29 and Hwy 129. While waiting Shannon Lancaster informed Investigator Ruane that he would try to call "Chuncka", Larry Ralph White, to get the methamphetamine. Investigator Ruane informed Shannon Lancaster that Investigator Ruane would not want to purchase the methamphetamine from him. Investigator Ruane knows Larry Ralph White very well through other methamphetamine investigators and Investigator Ruane was worried that Larry Ralph White might recognize him as being a Narcotics Investigator. Shannon Lancaster also spoke with a unknown person on the phone who wanted to buy a small amount of methamphetamine that Shannon Lancaster had on his person. Shannon Lancaster told that person to meet us at the Spinx/Burger King. That person never showed up before we left.

17:05—Investigator Ruane and Shannon Lancaster left Spinx/Burger King

17:10—Investigator Ruane and Shannon Lancaster arrived back at the trailer, and left headed to Spartanburg, SC. Shannon Lancaster informed Investigator Ruane that his girlfriend would meet us on Asheville Hwy. in Spartanburg with the methamphetamine. Shannon Lancaster told Investigator Ruane that we would meet his girlfriend at the Pizza Hut on Asheville Hwy. Shannon Lancaster also called back the person who was going to buy the methamphetamine that Shannon Lancaster had on his person and told that person to meet us at the Pizza Hut on Asheville Hwy.

## Buy Notes for Case #16040895 (continued)

17:34—Shannon Lancaster informed Investigator Ruane that the Hispanic would have the methamphetamine in Wellford, SC. Investigator Ruane turned around and headed back to Wellford, SC. Shannon Lancaster told Investigator Ruane that they would be pissed off if we didn't get the methamphetamine from Wellford since the guy was on his way. Shannon Lancaster stated that they would cut him off if we didn't get the methamphetamine from them.

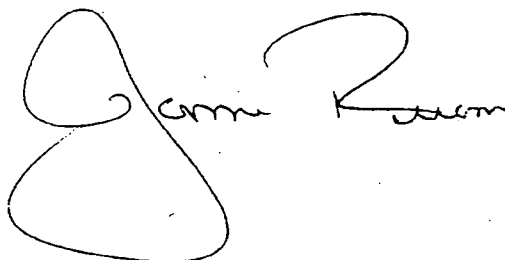
17:42—Investigator Ruane and Shannon Lancaster arrived back at the Dollar General in Wellford, SC. Shannon Lancaster was attempting to meet an unknown person to sell him a small quantity of methamphetamine that Shannon Lancaster had on his person.

17:46—Investigator Ruane and Shannon Lancaster arrived back at the trailer in Wellford, SC. Shannon Lancaster informed Investigator Ruane to stay at the trailer this time and not to go back and wait at the Dollar General.

While waiting at the trailer, a Nissan Maxima bearing SC Tag LHW534 pulled into the trailer and parked directly behind Investigator Ruane. A dark complexed white male wearing a plaid shirt, gray slacks, clean cut, dark hair, and wearing sun glasses exited the vehicle and walked into the trailer. A female stayed in the vehicle in the drivers seat with the vehicle running. A short time later Shannon Lancaster exited the trailer and handed Investigator Ruane a plastic bag containing a pink crystal like substance and walked back into the trailer.

18:05—Investigator Ruane left the trailer alone. Shannon Lancaster stayed at the trailer.

Due to the length of time of this buy, the transaction was not recorded due to the equipment running out of battery. Investigator Ruane was able to get some of the details of the buy, but not the buy in its entirety. While Investigator Ruane was driving Shannon Lancaster to the buy, Shannon Lancaster pulled out two (2) chrome plated .25 pistols with wood grips. Shannon Lancaster informed Investigator Ruane that he (Lancaster) always carries a pistol with him during drug transactions. Shannon Lancaster also informed Investigator Ruane that he (Lancaster) was going to try to sell one of the pistols to the Hispanic male.



**LANCASTER, SHANNON M - Suspect**

DOB	04/08/1974	Race	W-WHITE, NON-HISPANIC
Sex	M	Ethnicity	Non-Hispanic
Height	6'00"	Weight	175
Address	304 OLD DIRT RD; OLD DIRT RD	City	SPARTANBURG
State	SC	Zip	29307
Phone	(864)621-2376	DL State	South Carolina
DL Number	7376763		

**NARCOTICS - Complainant**

DOB		Race	
Sex		Ethnicity	
Height	6'00"	Weight	180
Address	8045 HOWARD ST	City	SPARTANBURG
State	SC	Zip	29303
Phone	(864)503-4500	DL State	
DL Number			

**Property****Drug - Evidence**

Quantity	27.6	Total Value	\$1.00
Measurement	Gram	Amount Recovered	\$0.00
IBR / UCR Code	Drug/Narc, Amphet or Methamphe	Date Recovered	04/15/2016
Status	Seized	Owner	

**Narratives****Original Narrative - Ruane, James - 04/18/2016 13:26:26**

On April 15, 2016 Investigator Ruane, acting in a undercover capacity contacted Shannon Lancaster in reference to purchasing an ounce of methamphetamine. Shannon Lancaster stated to Investigator Ruane to pick him up, and take him (Lancaster) to go get the methamphetamine. Investigator Ruane had \$1,250.00 of recorded Sheriff's Office Funds and an audio/video recording device. Investigator Ruane driving an uncover Spartanburg County vehicle was followed by other Investigators to pick up Shannon Lancaster. Once Investigator Ruane picked up Shannon Lancaster, he (Lancaster) told Investigator Ruane that he (Lancaster) had to go to Wellford for the methamphetamine. Investigator Ruane, followed by other Investigators, drove Shannon Lancaster to the buy location located at 112 Wild Oaks Drive, Wellford, SC. Investigator Ruane handed the recorded Sheriff's Office Funds to Shannon Lancaster who then exited the vehicle and walked inside the trailer. A short time later, Shannon Lancaster walked back to the vehicle and handed Investigator Ruane a plastic bag containing a pink crystal like substance. Investigator Ruane left and met with Investigators at a predetermined location. The pink crystal like substance weighed approximately 27.6 grams and did field test positive for methamphetamine. The pink crystal like was placed into Best Bag #S153095 and placed into evidence at the Sheriff's Office for further testing. The audio/video recording was transferred to a DVD for storage and still photo's were made for this case file.

This incident happened within 1/2 mile of Wellford Academy located at 684 Syphrit Road, Wellford, SC 29385.

Judge Blackley issued the following warrants on Shannon Lancaster: 2016A4210201358 PWID 1/2 Mile of School, 2016A4210201359 Trafficking Meth 2nd.

CONTROL NO. 5153095

PRINT ALL INFORMATION EXCEPT WHERE SIGNATURE IS REQUIRED

**FORM B (RULE 6)**  
**CERTIFICATE OF PROOF OF CHAIN OF PHYSICAL**  
**CUSTODY OR CONTROL**  
(Initial Custody)

This is to certify that I James Ruane am employed by  
(Name)

SCSO and that on  
(Name of Agency or Department)

April 15, 2016, I seized from SH  
(Date) (Year) (Name)

pursuant to Undercover Drug Purchase  
(State Whether Subject to Warrant, Lawful Arrest or Otherwise)

at or near \_\_\_\_\_  
(Place Where Seized)

the following substance(s) or container(s):  
(Describe substance or container with sufficient particularity to distinguish it.)

Crystalline Substance

On April 15, 2016, I made delivery of the above described  
(Date) (Year)

substance(s) or container(s) to Evidence of  
(Name)

SCSO in substantially the same condition  
(Law Enforcement Agency)

as when I received it.

Place: \_\_\_\_\_

Date: \_\_\_\_\_

James Ruane  
(Signature)

Sworn to me on this \_\_\_\_\_ day of \_\_\_\_\_

Notary Public for South Carolina

My Commission expires: \_\_\_\_\_

CONTROL NO. 5153095

PRINT ALL INFORMATION EXCEPT WHERE SIGNATURE IS REQUIRED

**FORM C (RULE 6)**

**CERTIFICATE OF PROOF OF CHAIN OF PHYSICAL CUSTODY OR CONTROL**  
(Subsequent Change of Custody)

This is to certify that I ROBERT ROSENBERG am employed by  
(Name)

SPARTANBURG COUNTY SHERIFF'S OFFICE as EVIDENCE OFFICER and that on  
(Name of Agency or Department) (Capacity of Employment)

04 18 16 I received IN PERSON  
(Date) (Year) (Specify Whether by Mail or in Person)

from DROP BOX of SPARTANBURG COUNTY SHERIFF'S OFFICE  
(Name of Person) (Law Enforcement Agency)

the following substance(s) or container(s) which were originally seized by

J. Reano  
(Name of Person making Original Seizure)

(Describe substance or container with sufficient particularity to distinguish it.)

Best Bag  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

On 04 18 16 I made delivery of the above described  
(Date) (Year)

substance(s) or container(s) to Aug Reano of  
(Name)

SPARTANBURG COUNTY SHERIFF'S OFFICE in substantially the same condition  
(Law Enforcement Agency)

as when I received it.

[Signature]  
(Signature)

Place: \_\_\_\_\_  
Date: \_\_\_\_\_

Sworn to me on this \_\_\_\_\_ day of \_\_\_\_\_

Notary Public for South Carolina  
My Commission expires: \_\_\_\_\_

Certificate of Service

I Shannon M. Lancaster hereby certify that on this 5 day of "October" 2017, that I have served a copy of "motion to suppress, Indictment # 2016GS4205068" and "Ex Parte" to the "Chief Justice of the S.C. Court of APPEALS", through the United States postal service and Perry Correctional Institution legal mail system.

- 1) Chief Justice S.C. Court of Appeals  
1015 Sumter Street/P.O. Box 11629  
Columbia, South Carolina 29211

RECEIVED  
OCT 10 2017  
SC Court of Appeals

Subscribed and sworn to before me  
This 5 day of October 2017  
Notary: Tamara Conwell  
Expires: My Commission Expires  
September 25, 2023

s/ Shannon Lancaster  
Shannon Lancaster

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OCT 05 2017

P.C.I. MAILROOM

Shannon M. Lancaster, Id. # 341546  
Perry Cor. Inst. / D2A-122  
430 Calkhoun Road  
Petzer, S.C. 29669

11/15

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P.C. MAILROOM

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OCT 10 2017  
SC Court of Appeals

~~Atty~~ Chief Justice of the S.C. Court of Appeals  
/ Reviewing Authority  
[REDACTED] 1015 Sumter Street  
Post Office Box 11629  
Columbia, South Carolina 29211