

To. The Honorable Ralph K. Anderson

Scri. Court of Appeals

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16- A2L- 04- 0756 AP

FEB 09 2018

2/6/18

SC Court of Appeals

Dear Sir,

I do not wish to file a reply brief, as my initial brief should be sufficient for my case. I wish to write a statement to clarify my appeal.

S.c.D.C. has not contested my accusation of my rights being violated, due to substitute counsel failing to prepare a defense. S.c.D.C. Policy 22.14 2.1, 2.2 requires substitute counsel to visit inmate at least 24 hours prior to D.H.O. hearing, to take statements from inmate as to what exactly took place. Substitute counsel Mr. Armstrong failed to do this for my D.H.O. hearing of 6/22/16. No reasonable person would consider an attorney to not see a client until the day of court, or adequate representation. This violates rights as defined in *Wolfe v. McDonnell*, 418 U.S. 539 (1974) which is given in S.c.D.C.'s defense.

S.c.D.C. has not contested the numerous cases citing that 16-15-410 is for internet/intestate trafficking of pornography. Several cases cited in appellant's defense support and confirm this.

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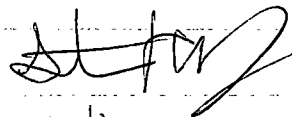
STATE OF MARYLAND

The charge of 16-15-410 is not appropriate for this incident.

S.C.D.C. employee Sgt. Singleton charged Appellant for possession of contraband for the same circumstances in 2/2001. As an employee of S.C.D.C., Sgt. Singleton defined the circumstances and evidence as 'possession of contraband', thus leaving no doubt that the appropriate charge for incident of 6/8/16 should have been possession of contraband. Lt. Williams further defined the photos as altered, agreeing with the definition of contraband.

I respectfully request that the court overturn the charge of 16-15-410, due to violation of Appellant's rights, procedural errors, and charge not appropriate for this case.

respectfully submitted,



Steven Higginsbotham # 237185
Tyger River Correctional Institution

200 Prison Rd. U3-100

Prisoner # 10222

C.C.

Christina Cortes - Blyden Esq.

S.C.D.C. General Counsel

February 6th, 2018

Steven Higginbotham #237685

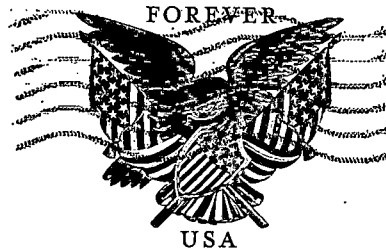
Tyger River Correctional Institution

200 Prison Rd W3-109

Enoree, SC, 29335

GOVERNMENT OF SOUTH CAROLINA

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SC Court of Appeals

MS: v. Claire Allen, Deputy Clerk

S.C. Court of Appeals

P.O. Box 11629

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