

FORM 18
PETITION FOR A WRIT OF CERTIORARI TO THE
COURT OR APPEALS

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THE STATE OF SOUTH CAROLINA
In The Supreme Court

S.C. SUPREME COURT

APPEAL FROM CHARLESTON COUNTY
Court of General Sessions

Roger L. Couch, Circuit Court Judge

Opinion No. 2017-001589 (S.C. Ct. App. filed Nov. 29, 2017)

The State of South Carolina,

Respondent,

v.

Glynndeavin von Fox,

Petitioner.

AMMENDED PETITION FOR A WRIT OF CERTIORARI

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CERTIFICATE OF COUNSEL

The *Pro Se* Petitioner for the case certifies that the Reinstatement was heard and decided by the South Carolina Court of Appeals on the 29th of November, 2017.

QUESTIONS PRESENTED

1. Did the Court of Appeals err in holding that this action is not barred by res judicata?
2. Did the Court of Appeals err in holding that petitioner had failed to timely object to the trial judge's charge on the burden of proof?

AMMENDED STATEMENT OF THE CASE

The amended issue of appeal is the direction of the South Carolina Probation, Pardon, and Parole towards an access to the South Carolina Department of Mental Health at the location of the Charleston/Dorchester Mental Health Community Center for the access of an mental health assessment of the Probatee Glynndeavin von Fox after no event is recorded in law enforcement or drug use connection to the sentencing portion of the appeal of Glynndeavin von Fox in case reference 2013A100095-96 by the Hon. Judge Couch. The appellant has already been screened by Dr. Geoffrey McKee, Dr. L. Randolph Waid, and the South Carolina Department of Mental Health at the Kirkland R&E facility as a non-mental illness, non-violent, and non-psychotic person. The access to the mental screenings and evaluations our less than a year old. This was after an International Travel request was made with Reissued United States of America Passport by the State Department of the United States of America that was stolen by the United Kingdom Embassy of Washington DC, which is referred to by the London Central Court as a foreign entity of the United Kingdom, and is in current pending status of being heard in that court through filings at the United States of America Postal Office under United Kingdom Laws and Guidelines.

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ARGUMENT

1. THE COURT OF APPEALS SHOULD HAVE HELD THAT THIS ACTION IS BARRED BY RES JUDICATA.

The South Carolina Court of Appeals should have held that this action barred by Res Judicata by violation of the South Carolina Const. Art. 1, Sec. 3, in evidence, pre-trial, and federal law sought in a State of South Carolina Lower Court.

- The pre-trial use of documents contained within printed emails of a licensed psychologist in Dr. Susan Knight as hearing fact without actual psychological tests like the Minnesota Battery, MacArthur Battery & The records from the Japanese country regarding actual medical diagnosis of a foreign citizen travelling in that country for business & tourism under Japanese Law allowance with no criminal record in Japan or prison stay in Japan regarding Glynndeavin von Fox.
- The Trial procedures of Hon. Judge Couch to allow exhibits into the court proceedings from Japan, documents from the Charleston Police Department given under Rule 5 by the 9th Circuit Solicitor's Office, and to allow the manipulation of federal law by the 9th Circuit Solicitor's Office to convince a jury on federal question in a State of South Carolina Lower Court that has no ratification ability to hear such.
- The allowance of material already decided by the Charleston Municipal Judge, a one Hon. Judge Mendelsohn, in order to "Paint a Picture" for the jury, from decisions that were in favor of Glynndeavin von Fox regarding Dismissed/Not Guilty verdict by the very employment court of the Charleston Police Department was a *Res Judicata* action that should have been barred by the South Carolina Court of Appeals regarding witness testimony.

2. PETITIONER DID TIMELY OBJECT TO THE TRIAL JUDGE'S ERRONEOUS CHARGE ON THE BURDEN OF PROOF.

The petitioner did timely object to the trial judge's erroneous court movements to damage jury verdict on the Burden of Proof. The pre-trial and trial are riddled with issue of federal law in a State of South Carolina Lower Court, evidence violation under S.C. Const. Art. 1, Sec. 3, Witness Testimony that was violated under S.C. Const. Art. 1, Sec. 3, and were in constant objection during pre-trial and the actual trial of *The State of South Carolina vs. Glynndeavin von Fox* (2013A101200095-96) within Jurisprudence of every aspect of the trial.

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CONCLUSION

For the reasons stated, petitioner asks the Court to grant the petition for a writ of certiorari.

Respectfully submitted,

December, 19th 2017

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**South Carolina Department of Probation, Parole, and Pardon Services
Service Referral Information**

General Information		
Offender's Name GLYNNDEAVIN VON FOX	SID # 02085649	Referral Date 02/15/2018
Address/Current Location 9371 KOESTER ROAD NORTH CHARLESTON, SC	Phone# 843-224-4483	Cell Phone# 843-224-4483
Offense Assaulting a Police Officer	Date of Birth 10/13/1977	SSN 248377222
Prior Offense History Pertinent to Referral	Family Support System? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Veteran? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Supporting Information/Special Instructions	Prior Addiction Treatment? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Inpatient <input type="checkbox"/> Outpatient	Receiving Public Assistance at this time? If so, list Agency. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Referred By Agent Aulbach	Office Location SCDPPPS - Charleston	Phone# 843-740-1553 EXT 163

Reason for Referral

<input type="checkbox"/> Court/Board Ordered	<input type="checkbox"/> Supervisor Ordered/1182	<input type="checkbox"/> SMART Probation Program
<input type="checkbox"/> Hearing Officer Ordered	<input checked="" type="checkbox"/> Agent Ordered	<input type="checkbox"/> Contractual Services
<input type="checkbox"/> Drug Test Results	<input type="checkbox"/> Offender Request	

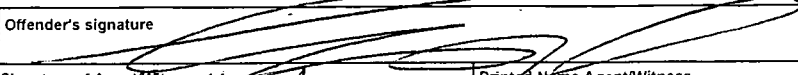
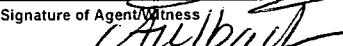
Reason for Referral [Check all that apply]

<input type="checkbox"/> Substance Abuse Services	<input type="checkbox"/> Vocational/Employment Services
<input checked="" type="checkbox"/> Mental Health Services	<input type="checkbox"/> Educational Services
<input type="checkbox"/> Anger Management Services/CDV Treatment	<input type="checkbox"/> Sex Offender Treatment Services
<input type="checkbox"/> Life Skills	<input type="checkbox"/> Legal Services
<input type="checkbox"/> Cognitive Behavioral Therapy	<input type="checkbox"/> Financial Services
<input type="checkbox"/> Housing Services	<input type="checkbox"/> Transportation Services
<input type="checkbox"/> Physical/Medical Services	<input type="checkbox"/> Other

Service Provider	Address/Location	Telephone#
Charleston Center	2100 Charlie Hall Blvd CHARLESTON, SC 29401	843-852-4100
Supporting Information/Special Instructions Report for MH assessment within 2 weeks. Forward assessment results to Christian.Aulbach@ppp.sc.gov		

Information Release

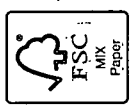
I authorize release of all information pertaining to my employment, medical, financial, and scholastic records or any other confidential information to the South Carolina Department of Probation, Parole, and Pardon Services' (SCDPPPS) duly authorized agents with the understanding that this information will be used to determine the need for services by the referral agency. I authorize SCDPPPS to release information pursuant to Department policies 1404 and 1405 to the Service Provider and I also authorize the service provider specified above release to the duly authorized agents of the South Carolina Department of Probation, Parole, and Pardon Services my treatment plan and summaries of my progress in attaining the objectives therein. I understand that this information will be treated in a confidential manner. I also understand that the consent shall remain in force for (1) one year, or until completion of services provided, whichever occurs earliest.

Offender's signature 	Date 2/15/18
Signature of Agent/Witness 	Printed Name Agent/Witness Christian Aulbach
	Date 2/15/18

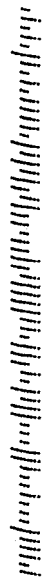
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