

To whom this my concern,

5-21-18

I'm writing this letter because I have a open case with the South Carolina Courts of appeal and my lawyer submitted a andres brief and I was giving the option to send anything I wanted to add to it but I wasn't giving a chance to send it in on time because I was denied access to the law library by SCDC (Lee County) because they claimed they didn't have a person to fill in this spot at the institution. I'm asking can this please be processed with my appeal because these are some serious issues I had and I'm innocent. I would truly appreciate it it because it's unfair and unconstitution to lie under oath and get someone life taking from them. I would truly appreciate. Can you write back once this is recieved and let me know if it wasn't filed and submitted thanks. have a blessed day.

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MAY 25 2018

SC Court of Appeals

Sincerely,  
Horace Watts  
Horace Watts

# ARGUMENT

The Courts erred when witness had Smith Testimony was objected to by a matter of law and Counsel asked that testimony be excluded ~~as a whole~~ and a mistrial be granted. Also the Court erred by letting witnesses testify and give hearsay testimony at trial that appellant shot victim Isaac Lewis, and the hearsay testimony in the case was broad, not reliable, and with out foundation. This unreliable inadmissible hearsay testimony giving by witnesses was very dangerous and prejudicial and caused the jury to draw the impermissible conclusion that since some people saw appellant with a gun, he must have been the murderer, and must have shot Johnson. Giving these unreliable testimony and inconsistent statements by witnesses, Appellant should be granted a new trial.

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## Relevant Facts

On July 12, 2014 witness April Cleckley gave a statement to the police on the night

of this murder saying "she didn't see who shot victim Issac Lewis she just heard the shots." she also states in her statement "she didn't see any guns." At Trial (Feb. 6-9 2017) she states "she watched appellant shoot Lewis." Chad Smith was giving instructions on how to give testimony at trial by honorable Judge Clifton Newman and was told he couldn't give any certainty to a weapon because a weapon wasn't recovered but witness Chad Smith did anyway when he answered a question "stating that it was practically impossible that these .45 shells came from another weapon." Also most of all witnesses say they saw appellant face to face with victim J. Lewis. Victim J. Lewis asked appellant "was he going to shoot him" then appellant fired shot to victim chest. Most if not all witnesses gave account of this story to the police in a written or audio recording and testified at trial making the same allegations. When the state called Marcus Bradley (pathologist) he gave testimony that victim died from a single gunshot wound to the back with Marcus Bradley

testimony most if not all witnesses  
testimony should be excluded because  
witnesses had no personal knowledge  
or didn't actual see appellant shoot  
victim I. Lewis or T. Johnson. Given  
this unreliable inadmissible hearsay  
testimony that persuaded the jury  
to believe because appellant had a  
gun he killed victim in this case  
was very prejudicial, unconstitutional  
and because of these issues appellant's  
case should be admended back to  
South Carolina Court of General Sessions  
in Richland County and granted a new trial.  
Also testimony by Chad Smith inflamed  
the jury to find the appellant guilty was  
prejudicial and unconstitutional to appellant.