

January 8, 2020

RECEIVED

JAN 13 2020

S.C. SUPREME COURT

The Honorable Daniel E. Shearouse
Clerk, South Carolina Supreme Court
P.O. Box 11330
Columbia, S.C. 29211

RE: Fred Halcomb, Jr., v. State of South Carolina Appellate case No. 2019-000476

Dear Mr. Shearouse :

I am writing to inform the court that my attorney Jeremy A. Thompson has informed me by letter dated December 23, 2019 and received January 1, 2020, as well as by phone on January 6, 2020 that he intends to file a motion to be relieved as counsel due to him applying for a position with the Appellate Division of the Federal Public Defender's office in Columbia, South Carolina right before Thanksgiving and being accepted in December. I knew none of this until I received the letter and moreover the telephone call on the 6th of January 2020.

I wish to inform the court that I oppose Mr. Jeremy A. Thompson of the law office of Jeremy A. Thompson LLC. being relieved as my attorney for the above mentioned matter. Mr. Thompson signed a contract in agreement to represent me for the appeal to the Supreme Court of South Carolina from the denial of my post conviction relief. Said agreement includes appearance at any and all hearings on behalf of client in the matter before the Supreme Court, as well as preparation of any and all motions, briefs, orders, memoranda of law, etc., as may be necessary to properly represent client. Mr. Thompson agreed to provide the agreed

representation outlined above for a total fee of \$15,000.00. My step-father Michael Petrocine paid a retainer fee of \$7,000.00 up front. The remainder was split up into sixteen monthly payments of \$500.00 dollars each due on the first of the month starting March 1, 2018 and ending June 1, 2019. My step-father was charged an additional \$1,000.00 dollars for expense fees which he paid up front making it \$8,000.00 up front and \$8,000.00 in payments which Mr. Michael Petrocine paid in full on time each payment. Mr. Thompson stated in the contract he expressly agrees that Michael Petrocine will not be charged any additional amount in fees once the total fee of \$15,000.00 has been earned by the law firm. This fee agreement was entered into on the 20th day of July, 2017 and all terms as far as payment have been met. My family paid Mr. Thompson an additional \$600.00 dollars the month of May 2019 for Mr. Thompson to fly to Illinois and visit me at Pontiac, IL. to discuss the issues that would be briefed for the writ of certiorari. My family has met every financial demand Mr. Jeremy A. Thompson has issued and now Mr. Thompson is attempting to just up and decide to apply and get a position of employment with the Federal appellate defense while telling my mother Mrs. Petrocine and I that he Mr. Thompson feels he has earned all the money paid and I should request Indigent defense or retain counsel he recommended in the letter attached. My family cannot retain another lawyer and my family and I trusted Mr. Thompson to fulfill representation as agreed and paid for, I am in the middle of an appeal that could prove my innocence. Mr. Thompson is being very unethical by applying and accepting another job after accepting all his clients' money and agreeing to fully represent them on their legal matter and then feeling he earned all the money and break the agreement, when the contract clearly states the money would be held in a trust until earned.

throughout the representation which is not fulfilled as I'm still awaiting him to submit the reply and then the state's sur-reply, which then I will have to await a decision on whether I'm granted certiorari and then Mr. Thompson would have to do the appeal if granted certiorari as he agreed and was paid to do.

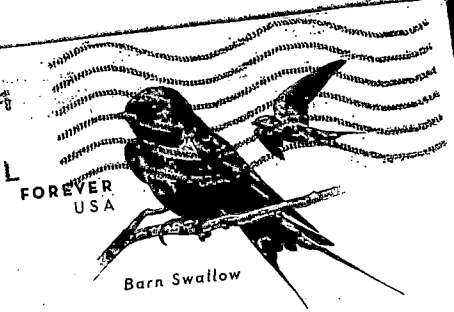
At this time I respectfully request this court deny Mr. Jeremy A. Thompson's motion to be relieved as counsel and order Mr. Thompson to complete representation as he both agreed and was paid to do. Thank you for your time and any assistance you may provide me with the above mentioned matter. Please find enclosed a copy of the contract dated July 20, 2017 and letter dated December 23, 2019 for your convenience.

Sincerely Yours,
Fred R. Halcomb
Fred R. Halcomb Y24362
Stateville C.C. B-House 615
P.O. Box 112
Joliet, IL. 60434

January 8, 2020

Fred R. Halcomb 124362
Stateville C.C. B-House 615
P.O. Box 112
Joliet, IL 60434

S SUBURBAN IL 604
09 JAN 2020 PM 1 L



U.S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
COMMUNICATIONS SECTION

Legal Mail

The Honorable Daniel E. Shearouse
clerk, South Carolina Supreme Court
P.O. Box 11330
Columbia, S.C. 29211
Halcomb v. State of S.C. App. Cs. 2019-000476

29211-133030

