

January 23, 2020

Dear Supreme Court Justice,

Thank you for your time to consider my Pro se Response before you this day. I am writing you in prayer that this written memorandum will be taken into consideration and that you will look deep into the details of this case for it determines the fate of my future.

I am not guilty of these charges that have been brought against me. In fact, it's quite the opposite. I too was a victim of that horrifying and horrific night of August 19, 2012 that took the lives of my husband Amos and stepson, Tommy.

I believe that my life would have been taken also had I not been awakened by our dog clicking my face. I was knocked out and tied up with duck tape after fighting for my life. I woke up to find my clothes had been ripped off my body, my family murdered, confused

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S.C. SUPREME COURT

traumatized. I called 9-1-1 and tried to tell them what had occurred. I was in shock and under the influence of mind-altering medication.

There are no words to describe the interlial pain that ails me today. Not to the mention, the rest of my family.

Once again, that day I was victimized by Horry County Police Department. They made me go to the hospital where they insisted I allow a rape kit to be performed on me; which was never sent out to be tested for any evidence of me being assaulted.

They wrongly implicated me as being the master mind; by accusing me of the murders of my husband and stepson. This after wrongfully questioning me knowing that I was under the influence of mind-altering medication that causes memory loss, amnesia and black outs. They know this because of the results of my blood work that was processed on the morning of August 19, 2012. Horry County Police Department's Detectives twisted my words and took advantage of my vulnerable state of mind; confusing me

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under shock and duress.

Detective Grebowitz, the lead detective in this case, admitted on the stand that he forgot to read me my rights before questioning me, and he would do them now; after (50) fifty minutes (approximately) of illegally questioning me. Somehow I self-incriminated myself after he got what he could use to implicate me in the murders of my loved ones. Depriving me of freedom and depriving me of my rights.

Audio 1:00:01

The hand of one is the hand of all. The state never proved beyond a reasonable doubt that I was a part of this horrific criminal act of violence against myself, my husband and my stepson. My involuntary statement to the Henry County Detectives led them to create the theory that because one of the men involved had at one time cut our grass and was in possession of our phone number, had a text message that were never proven to be sent or received from me, so they concluded that a "murder for hire" had occurred. Their reasoning came from a life insurance policy that was one of two that he had purchased

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prior to the purchase of our new home in North Carolina. We were in good standing with our finances. The state never proved that our financial distress could have resulted in "murder for hire". No one ever wrote any statements implicating me.

I loved my husband; he was a wonderful man. Horry County was prejudiced against me from the moment I disclosed that Amos Hatfield, my husband, was 27 years older than me.

At that moment I became their prime suspect. "Nearest and Dearest" I had no idea that I would be in the fight for my life because of my life-style with my husband.

Evidence did not give me life in prison.

Prejudices, rush to judgment and suspicion gave me life. What happened to Due Process? This case should be reversed and remanded for a new trial with evidence to convict me by law.

Finally, I urge you to please take a long look into the lack of evidence surrounding this case. Thank you for your service and consideration in the decision that will forever change my life and the lives of my family and ultimately my freedom.

Supreme Court of North Carolina
Daniel E. Shearouse
Clerk of Court
PO BOX 11330
Columbia SC 29211

January 23, 2020

Sandy Lee Lockhart #360304 WH-A-16

Camille Griffin in Graham Correctional Inst.

4450 Broad River Rd.

Columbia SC 29210

Re: Pro-se Response of Petition

Case No. 2019-0008104

Dear Supreme Court Justice,

Before you, are pro-se response to counsel's submitted petition of writ of certiorari indicating that appeal is without merit. Petitioner disagrees. Counsel was ineffective for failing to raise key issues in order to minimize the likelihood of success in appeal. "Structural Error" that substantially affects petitioner's legal rights and rights to a fair trial obligations which if uncorrected would

result in "miscarriage of justice" and which justifies reversing a judgment in the court below; synonymous with prejudicial error. 314 P. 2d 973, 976 : During jury deliberation, jury requested the trial judge provide them with the definition of involuntary manslaughter "officially by code of law." Instructions which confuse or mislead the jury are erroneous, prejudicial violations. It had no hard and fast definition. It seems assured, however that where error has been committed and where petitioner finds that upon the record it is seriously doubtful that without such error the petitioner would have been convicted of a lesser "included" charge of murder. It is reasonable to assume the jury is focusing (critical attention) on the specific charge read indicated they were struggling with the charge of murder. There is reasonable likelihood the verdict would have been a lesser "included" charge had not for error failing to charge the principle embodied in the jury's request. Supreme Court must determine beyond a reasonable doubt that the error complained of did not contribute to the outcome of verdict rendered. Reviewing court is required to review the trial court charge to the jury in its entirety;

When reviewing jury charge for error the court must consider the charge to the jury as a whole in light of the evidence and issues presented at trial. Trial court is required to charge only the current and correct law of S.C. * 813. A jury charge is correct if when the charge is read as a whole it contains the correct definition and adequately covers the law of S.C. The jury returned its verdict approximately one hour after the trial judge proved the error charge resulting in a verdict of murder which prejudicial to the petitioner by failing to charge correct instruction on involuntary manslaughter without objection from either state or defense counsel. The state stated to the judge was he going to re-read it all.

The substance of the law is what must be instructed to the jury; not any particular verbiage

Sandy Lee Locklear
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