

STATE OF SOUTH CAROLINA )  
COUNTY OF YORK )

**RECEIVED**

NOTICE OF MOTION FOR  
DIRECT APPEAL AND NOTICE  
OF MOTION FOR ENHANCEMENT

Tavis A. Colston  
vs.

FEB 18 2020

SC Court of Appeals

REVIEW AND MOTION  
FOR COUNSEL

State of South Carolina

INDICTMENT DOCKET NO.  
2019-GS-46-08049

### MOTION FOR DIRECT APPEAL

Please take notice that I Tavis A. Colston is motioning for an appeal to the South Carolina Court of Appeals for the following reason(s):

1. Trial Judge is in error for not suppressing evidence when the state failed to meet its burden to prove by a preponderance of the evidence that the challenged evidence is admissible under the plain view doctrine.
2. Trial Judge should have granted a directed verdict motion when the evidence presented merely raises a suspicion the accused is guilty.

### MOTION FOR ENHANCEMENT REVIEW

Please take notice that I Tavis A. Colston is motioning for South Carolina Court of Appeals to review and apply S.C. code 44-53-470 for the following reason(s)

1.

1. Based on S.C. code 44-53-470 enhancement is required by law only when a person has a previous conviction of possessing drugs and distributing drugs or trafficking drugs on their record.
2. Illegal enhancement of possession of methamphetamine which after review of prior record it is believed to find error by the states decision to enhance to second offence.

### MOTION FOR COUNSEL

Please take notice that I Tavis A. Colston is motioning for counsel for the following reason(s).

1. It is my constitutional right to be provided counsel during the process of my appeal under the Fifth, Sixth and Fourteenth Amendment of the United States Constitution and Article One, Sections Three and Fourteen of the South Carolina Constitution.
2. This is not my final address and since being found guilty I will be shipped to prison tuesday of next week. (2/18/20)

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With that being said I ask prior to responding that you locate me threw South Carolina Department of Corrections with a timely response but if you can not locate me threw SCDC I ask you and grant permission to mail a timely response to address below.

P.O. box 254  
rock hill, SC 29731

Respectfully Submitted,

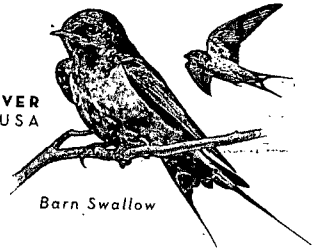
*Tavis Colston*

Tavis Colston

Tavis Colston #1489866A

Smart Communications - YC Jail  
7001 St. Andrews Road  
Columbia, SC 29212

FOREVER  
USA



Barn Swallow

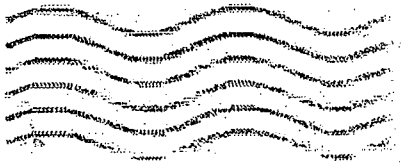
THE YORK COUNTY DEPARTMENT CENTER  
IS NEITHER CENSURED NOR INSPECTED  
THIS ITEM. THEREFORE THE DEPARTMENT  
DOES NOT ASSUME RESPONSIBILITY  
FOR ITS CONTENTS.

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SC Court of Appeals

S.C. Court of Appeals  
1220 Senate St.  
Columbia, SC 29201



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