

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

Certiorari to Horry County

William H. Seals, Circuit Court Judge

BRITTANY A. JOHNSON,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO. 2020-000012

SUPPLEMENTAL APPENDIX

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Aug 31 2020

S.C. SUPREME COURT

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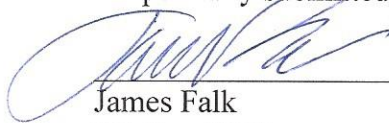
AMENDED APPLICATION FOR POST-CONVICTION RELIEF1

STATE OF SOUTH CAROLINA)	COURT OF COMMON PLEAS
)	
COUNTY OF HORRY)	FOR THE 15th JUDICIAL CIRCUIT
)	
Brittany Johnson)	
)	
Applicant)	2016-CP-26-06535
)	
Vs.)	
State of South Carolina)	Amendment to PCR Application
)	
Respondent,)	
_____)	

Applicant by counsel hereby amends her October 11 7, 2016 PCR application to add the following grounds for relief

1. There was evidence introduced at trial that would “reduce, mitigate, excuse or justify the homicide” therefore trial counsel provided ineffective assistance of counsel by failing to object to the inferred malice charge found at p 405 l. 12-23. As this issue was not preserved for appeal, it could not have been raised on direct appeal.
2. Trial counsel provided ineffective assistance of counsel by not objecting to the “seek the truth” language included in the Court’s charge at p. 402 l. 22-25.
3. Trial counsel provided ineffective by failing to interview Joseph Gaghum who could have testified to the victim’s role in escalating the hostilities between her and Applicant.

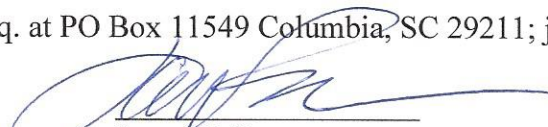
Respectfully submitted,



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CERTIFICATE OF SERVICE

Undersigned certifies that on November 14, 2018 a copy of the above was both mailed and emailed to Johnny James Esq. at PO Box 11549 Columbia, SC 29211; jjames@scag.gov



James Falk