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pages.

December 10/2020.

To the Court of  
Appeals of South  
Carolina State

SC Court of Appeals

JAN 14 2021

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Re: Appellant Attorney  
Adams S. Ruffins, S.C.  
Office of Appellate Defense.

From the Appellant John  
Tyler Padgett, B. State of  
South Carolina (Case 2019-00902)

"Complaint."

The attorney who I represent  
the Appellant as Appellant,  
Case 2019-00902, is ineffective  
assistance of counsel in the  
Appellant appeal. Because  
he failed to raised the  
important issues Appellant  
raised himself on the  
record for concerning  
the undersigned Appellate. (Spec)

of Attach to the arrest  
warrant. The unsworn affidavits  
submitted by the arresting  
officer. The appeal attempt  
over its up because these  
were the issues raised  
on the record at trial.

The attorney who represented  
Appellant on appeal failed  
to raise the issues raised  
at trial. The court failed  
to give Appellant preliminary  
hearing. The appeal attorney  
Adams S. Pettus failed  
to contest those raised  
issues. (1) Unsworn Affidavit  
(2) failed to give Appellant  
request for preliminary  
hearing. And the court  
fail to appoint attorney.

those issues were raised  
by Johnny Tyler Padgett on  
the records. The court  
ruled against Padgett those  
issues raised Padgett did

3

comply by the SC Supreme Court ruled in *Evans vs. State* (Case 263-SC-495-611 SE2d 510 (2005)) overruled any prior cases finding challenges to the indictment, grand jury, or a preliminary hearing to be issues of subject matter jurisdiction. Those issues were raised at trial and preserved them for appellate court reviews. See *Evans vs. State* 611 SE2d 510 (2005)

Appellate Attorney for Adam S. Ruffins fails to raise the issues, the Appellate Attorney raised issues with no merits. But ignored the raised merits issues which would send the case back to the Saluda County Circuit Court for further process. But the Appellate Attorney Adam S. Ruffins' choice were ignored the raised important

(4)

issues. The appeal appellant  
shown the issues that the  
Court should have appointed an  
Atty when the appellant  
states on the record he  
did not want to represent  
himself. Under the Johnson  
vs Zerbst. 304 U.S. 458 (1938)  
finding failure to appoint  
Counsel at Trial. Will deprive  
the Circuit Court of subject  
matter jurisdiction and the  
appellant object, but this  
appeals Court to have the  
Appellate Defense Attorney raise  
these issues raised on  
the Court record of subject  
Terry Trial / May 21-22-2019.  
This unfairly to the appeal  
appellant subject by the  
Appellate Defense Counsel.

The Appeals Appellant Johnny  
Tyler subject pray that this  
S.C. Court of Appeals will  
order this S.C. Office of Appellate  
Defense Counsel Mr. Alan Coffey

(S)

Raised those merits issues  
RAISED AT THE TRIAL IN  
MAY 21-22-2019-TRANSCRIPT.

(1) Arrest WARRANT and  
Attach AFFIDAVIT.

(2) Preliminary hearing  
requests to the magistrate  
Court. "Denied."

(3) All TRIAL TRANSCRIPTS OF  
MAY 21-22-2019.

(4) All other Charges were  
related to the Charge  
of Failed to stop for Blue  
light. (4) other Charges  
were dropped since  
the appeal pending in the  
S.C. Court of Appeals. The  
S.C. office Appellate Defense  
Counsel did not did no indicate  
he would have address  
these Charge in budget Appeals  
2019-00702. These Enclose  
Copies of the Charges related

(6)  
to the Appeal Case 2017000  
902. fails to stop for a  
Blue. The @ of Charges  
here were dropped. Please  
The appeal Case within the  
position of the 14 fourteenth  
14th Amendment to the  
United States Constitution &  
which states hereby below.

(1) That pursuant to the fourth  
4th Amendment of the United  
States Constitution is made  
Applicable through the 14th  
fourteenth Amendment to  
the United States Constitution  
States " NO WARRANT SHALL  
ISSUE, BUT UPON PROBABLE  
CAUSE SUPPORTED BY OATH  
OR AFFIRMATION,

(2) That because NO person  
sworn to the allegations,  
contained in the supporting  
AFFIDAVIT before a Notary  
Public for the State of S.C.  
SEE Appellant Brief identify

(2)

The Clear Recs of the issues raised under States 14th Fourteenth Amendment (insert) these charges dropped.

(1) 2019 Ticket 6102 P044921.  
Charge uninsured motor vehicle fee.  
Violation 1st offense, 01-09-2019.

(2) 2019 Ticket 6102 P044923.  
Failure to give or giving improper  
TURN signal, stop Penal, etc.  
01-09-2019.

(3) 2019 Ticket 6102 P044922  
operating or admitting operation  
of vehicle which is not  
Registered And licensed,  
01/09/2019.

(4) DUI, under suspension,  
license not suspended,  
for DUI 1st offense

The Appellant Appeal Counsel  
Adam Ruffins did not raise

(8)  
or tell the Court Concern  
these Charges were Dropped  
the Failure to Stop for  
Blue Light were DROPPED  
At the first Appeal  
As were Brought Back  
on the record.

The Court of Appeals.

Should Consider Appellant  
Johnny Tyler Falgett and  
Att. Against His Appeal  
Attorney order him to  
filed these issues on the  
records states Above  
And these Dropped Charges  
All Related to Failure  
to Stop for Blue Light.

Appellant pray for Relief  
in this matter.

at odds, etc. Respectfully Submitted  
December 19/77  
Johnny Tyler Falgett

① of ②

Johnny Tyler Padgett

317 A. N. Bookers

Ferry Road

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JAN 14 2021

SC Court of Appeals

Saluda. SC 29138

864-554-4680

Encl. Johnny + Padgett 56 @ Clude Com

re: Complaint against appeal  
Attorney failure to raise  
the issues in Court record.

To Mrs. JENNY ABBOTT Kitching  
Clerk of Court  
SC Court of Appeals.

P O Box 11629  
Columbia - SC 29211

Please accept this communication  
as a letter reference to the  
above matter in Case 2019-00022  
Johnny Tyler Padgett is state  
of S.C. The Attorney Adam S.  
Ruffins failure to raised the

(2)

many issues for appellate  
records. These are needed  
to be raised into the  
Luffins Brief Attorney for  
Johnny Fudgett on Appeal.

Will you please my complaint  
and ask the court to order  
my attorney to raise the  
needs issues he chooses to  
not to put them before  
the court.

Enclose of Fudgett  
Complaint. Dated on  
December 10/2020.

Thanks for the  
assistance into this  
matter.

John Fudgett

December 10/2020  
540 Adams St.

Johnny Tyler Padgett  
317 A N-Bousnight  
Ferry Road  
Saluda S.C. 29138



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SC Court of Appeals

Mrs. Jenny Abbott Kitching  
Clerk of Court  
SC Court of Appeals -  
P.O. Box 11629  
Columbia S.C. 29211

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