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Spartanburg County Clerk of Court
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P.O. Box 3483
Spartanburg, SC 29304-3483

Marco Bates-249552-AB-47
LCI / P.O. Box 205
Ridgeville, SC 29472

2020 MAR 5 AM 10:58

CLERK OF COURT
SPARTANBURG COUNTY
AMY W. COX

Feb. 5, 2020

RE: Response from FOIA letter(s) I wrote to you in 2019 (97-GS-42-2599 and
98-GS-42-2419).

Exhibit (A)

Dear Ms. Tanya Camp,

I wrote to you several times in 2019 in reference to your response(s) to me. In my letter(s) I asked you to explain, what did you mean when it says, "after reviewing the above referenced case(s), we did not find any documentation filed that authorized funds to be made available for an expert."

May I ask you to please provide me with a copy of your response back to me on or about Sep. or Oct. of 2019, explaining your statement of "after reviewing the above referenced cases, we did not find any documentation filed that authorized funds to be made available for an expert," specifically Donald Grant, because I lost my first copy you sent me.

I'm also asking to be provided with a Post-Conviction Relief Application. If there is a small cost for any copies, please provide me with the amount. Thank you for your time in this matter.

Sincerely,

Marco Bates

RECEIVED

MAY 27 2021

S.C. SUPREME COURT

staxo

after looking through your files

9

we did not find a documents

at request funds for an expert.

Mike Bartosh - Direct examination
by Mrs. Turner

EXHIBIT (B)

1 was some discomfort on the SLED agent's part when the judge
2 was questioning him.

3 Q Okay. Okay. Now, I, I don't know how much this
4 actually became a part of the record, but just for the sake
5 of a clean record, you did, in fact, hire an expert witness?

6 A We hired -- Mr., Mr. Bates' contention all along had
7 been that the lady, that the victim in the case had been
8 shot from inside the trailer. *The SLED -- the, the firearms
9 folks from SLED and also the Sheriff's Department crime
10 scene folks never determined where the fatal bullet came
11 from. * * They did sort of a, a cursory investigation. * But as
12 far as we could determine, there was never any indication as
13 to where the, the fatal bullet came from. *

14 I had used Mr. Gurnt on several occasions before this.
15 He is -- he's a retired SLED agent. He does blood splatter
16 and also crime scene reconstruction investigation.

17 *So, now, the part that Mr. Bates talks about where I
18 went and talked to the codefendants to see if they'd be
19 willing to go in on, on hiring him, I don't recall that
20 because our office has a, has an expert witness fund that is
21 available to hire experts, and that's where the money came
22 from to, to hire Mr. Gurnt. *

23 Mr. Gurnt lives in Columbia. He drove up from
24 Columbia. We met at our office. We went out to the
25 trailer. This was in, this was in, within a very short

CLERK OF COURT
SPARTANBURG COUNTY
AMY W. FOX

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Mike Bartosh - Cross-examination
by Mr. Robinson

Exhibit (C)

1 something either Mr. Bartosh did or did not do, that goes
2 to, directly to the ineffective assistance of counsel, the
3 State would object to that line of questioning.

4 THE COURT: Mr. Robinson.

5 MR. ROBINSON: Your Honor, I think it's extremely
6 important. It goes to the investigation of no bullet that
7 would put to, that would put any of these codefendants as
8 the person who killed this person and so forth. I think it
9 goes to the investigation and it goes to whether or not
10 Mr.---

11 THE COURT: I'll allow the question.

12 You may proceed.

13 MR. ROBINSON: Thank you.

*14 A Well, if my, if my memory serves me correctly, David,
15 and I can't think of his last name, the, the SLED---

16 Q Collins, David Collins.

17 A Collins I think testified at trial as to the bullet
*18 that killed her.

19 Q Okay. When you had Mr. -- let me go back on this.

*20 Did you ever have your own investigation that would
*21 establish that that bullet either did or did not kill her?

*22 A No.

23 Q You did not?

24 A No.

25 Q Okay. And -- okay. So, we have a trailer full of

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SPARTANBURG COUNTY
AMY W. COX

Mike Bartosh - Cross-examination
by Mr. Robinson

Exhibit (D)

1 see where the bullet entered the, whether it entered the
2 trailer or whether it came from inside the trailer said the
3 bullet came from outside the trailer.

4 Q But Mr. Bartosh, what -- isn't it true that that would
5 not make a difference if the bullet that allegedly killed
6 this person did not belong to any, either of these
7 gentlemen, either of the codefendants, that wouldn't matter,
8 would it?

9 A Well, I think there was testimony that it did.

10 Q But you didn't have anything that---

*11 A I didn't have anybody, any independent test

*12 Q You had, you had -- okay. So, you had no independent
13 testing?

14 These, these, these -- we had a murder case here that
15 it was a, a circumstantial case in which there was a bullet
16 with no blood on it that had been allegedly recovered from a
17 tree. There were, there were bullets and guns in this
18 trailer.

19 And you did not do, you did not have any an
20 investigation as to whether or not any of the guns, the two
21 guns that belonged to these two individuals were the guns
22 indeed that actually killed this person?

*23 A No.

*24 Q Okay. And let's -- as far as Mr. Gurnt goes, you had
25 Mr. Gurnt go out there to talk, to look at where the bullet

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