

IN The State of South Carolina  
IN The Supreme Court

Robert Dexter Thomas<sup>III</sup>  
vs Appellant  
  
The State  
Respondent

Memorandum of LAW  
Interrogation Rights Violation  
Appellate Case No  
2021-000765

The Appellant wants to Add the New evidence of the rule 5 Brady Motion in an Spartanburg County Sheriff's Department (Pre-Interrogation Rights Violation Waiver form) that the Appellants 1<sup>st</sup>, 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> amendment to the U.S. Constitution Was Violated.

The Appellant Was taken into the Custody of The Spartanburg County Sheriff's Department at the Age of (Sixteen) not an adult, lawyer, Garden was present for the questing that is a violation of the Appellants 5<sup>th</sup>, 6<sup>th</sup>, 8<sup>th</sup>, 14<sup>th</sup> amendment to the U.S. Constitution.

The Appellant was only a (Kid) at the time, wasn't in an cut of jail, first time offende and the Spartanburg County Sheriff's Department took advantage of that, and when Appellant was placed in the County jail request a (rule 5 Brady Motion) that's when the Attacks Started by Police and Inmate being placed in Solentary Cofinement 4<sup>th</sup> 6<sup>th</sup> 8<sup>th</sup> 14<sup>th</sup> Amendment Violation to the US Constitution and the Appellant in a way was forced to plea to the Charges just to get away from the Spartanburg County Police and out of the County Jail and Nothing has Changed Since,, And the Added Kidnapping Charge just because.

See (Pre-Interrogation Waiver form

Exhibit A(1) (from rule 5 Brady Motion)

**RECEIVED**

AUG 10 2021

S.C. SUPREME COURT

SPARTANBURG COUNTY SHERIFFS DEPARTMENT  
Spartanburg, South Carolina

CASE NUMBER  
0903-008-94

PRE-INTERROGATION WAIVER FORM

Name Dexter Robert Thomas III Address Highway 150 Racolet SC  
1-5-78  
Age 16 Date 9-22-94 Time 8:35 AM  
Location Sheriff Dept.

1. I have the right to remain silent.
2. Anything I say can and will be used against me in a court of law.
3. I have the right to talk to a lawyer and to have him present with me while I am being questioned.
4. If I cannot afford to hire a lawyer, one will be appointed to represent me before any questioning, if I so wish.
5. I have the right to stop answering questions at any point in the questioning.

The above rights have been read to me by Ronald [Signature]

I have read same and I understand my rights fully.

Witness Ronald [Signature] Signed Robert Thomas [Signature]

I waive (give up) my rights as explained above and agree to talk to officer [Signature]  
in reference to Ramond Robbey (CASES OR CHARGES), and any statement that I may  
make is of my own free will, without fear, threat or promise or favor or reward of any kind.

I am able to read and write the English Language and finished 11 years in school.

Witnessed Ronald [Signature] Signed Robert Thomas [Signature]

Notorized \_\_\_\_\_

Expiration Date \_\_\_\_\_

FILED  
CLERK OF COURT  
SPARTANBURG COUNTY  
2918 APR 17 PM 2:37  
M. HOPE BLACKLEY

RECEIVED

AUG 10 2021