

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Certiorari to Williamsburg County  
Honorable George M. McFaddin, Circuit Court Judge

---

LEVERN MCCREA,

Petitioner,

vs.

STATE OF SOUTH CAROLINA,

Respondent.

---

The petitioner motion to have Appellate Counsel relieved because of his INCOMPETENCE, who has intentionally conspired against petitioner under the color of state law by proxy, with the Assistant Attorney General's office, to deprive petitioner of his right to address those egregious Brady violations committed against the petitioner during his trial. That was addressed on the record at the petitioner P.C.R. hearing by Counsel of record Lance Boozer, Appellate Counsel Taylor Gilliam, deliberately and intentionally refused to make those Brady violation that was CONCLUSIVE EVIDENCE, apart of petitioner claim for writ of certiorari. Wherefore, Petitioner having met his burden prays that this Court grant the requested relief and any other relief the Court deems just and appropriate!

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

CERTIORARI TO WILLIAMSBURG COUNTY  
HONORABLE GEORGE M. McFADDIN, Circuit Court Judge.

---

LEVERN McCrea,

PETITIONER,

VS.

STATE OF SOUTH CAROLINA,

RESPONDENT,

---

MOTION TO RELIEVE COUNSEL FOR INCOMPETENCE

---

APPELLATE CASE NO: 2020-001426  
PETITION FOR WRIT OF CERTIORARI

THE UNDERSIGNED MOVES TO HAVE  
APPELLATE COUNSEL RELIEVED IN THE ABOVE  
CAPTIONED MATTER FOR THE FOLLOWING REASONS:

1. APPELLATE COUNSEL IS NEGLIGENT IN  
PROTECTING PETITIONER DUE PROCESS RIGHT(S)  
TO ADDRESS ALL BRADY VIOLATION(S) WITHIN  
PETITIONER CLAIM. THAT INCLUDES THE LETTER  
OF LENIENCY, APPELLATE COUNSEL DELIBERATELY  
LEFT OUT OF PETITIONER CLAIM RELIEF.

(2) Appellate Counsel has displayed  
CONTUMPTUOUS AND UNPROFESSIONAL CONDUCT  
DURING A PHONE CONFERENCE CALL.

(3) IN ADDITION TO APPELLATE COUNSEL  
INTENTIONAL EGNORING TO ADDRESS OTHER  
BRADY VIOLATION(S) THAT WAS CONCLUSIVE  
EVIDENCE, IN PETITIONER WRIT OF CERTIORARI  
CLAIM FOR RELIEF.

BASED UPON THE ABOVE LISTED,  
THE UNDERSIGNED REQUESTS TO HAVE  
APPELLATE COUNSEL RELIEVED AND WILL  
PROCEED PRO-SE DURING WRIT OF CERT-  
IORARI CLAIM.

MR. LEVERN MCCREA  
# 348291 BB-12  
Ridgeland Corr. Inst.  
5-CORRECTIONAL ROAD  
Ridgeland, S.C. 29936

SOUTH CAROLINA SUPREME COURT  
COURT OF APPEALS (CLERK OF COURT)  
Post office Box 11330  
Columbia, S.C. 29211