

The State of South Carolina
County of Florence

In the Court of General Sessions
for the Twelfth Judicial Circuit

State of South Carolina
Plaintiff

Notice of motion and motion for

-VS-

RECEIVED "Motion of Compel"

Jeremy C. Pearce

SC Court of Appeals
Defendant

MAY 09 2022 Warrant No's 2019A2120201014, 1015,
1034 & 1035

The Twelfth Circuit Solicitors, E. L. Clement III; Solicitor; And Ryan
White; Assistant Solicitor; And Todd Tucker; Deputy Solicitor

Take notice that I Jeremy Pearce the defendant & client of Mr. Scott Sugg
am writing you today 01-11-21 to request notice to compel for the above
warrant(s), to include Rule 5, Police body cam from date of Arrest, drug analysis
In context of my criminal case, a motion to compel requesting that evidence
that may prove that the named defendant is innocent. A defense attorney who
has reason to believe that prosecution is withholding information and/or evidence
might file a motion to compel, asking a judge to force a prosecutor to
hand over all evidence. I will ask that this motion be respectfully granted.
Thanks for your time and cooperation.

Pro-Se

Florence, South Carolina

01-11-21

Respectfully Submitted
CCCP & GS
CHRIS POULOS O'HARA

CERTIFIED: A TRUE COPY

Donna Powell Ottens
CLERK OF COURT C.P. & G.S.
FLORENCE COUNTY, S.C.

State of: <u>South Carolina</u>
County of: <u>Florence</u>
Subscribed and sworn to (or affirmed) before me this <u>17th</u> day of <u>January</u> in the year 20 <u>21</u>
Signature of Notary Public <u>[Signature]</u>
My Commission Expires <u>June 23, 2027</u>

FILED
Sincerely yours
Jeremy Pearce
Jeremy Pearce

Case number 2022-000492

Thurs May 5

Jeremy Pearce

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MAY 09 2022

SC Court of Appeals

Dear Court of Appeals

I would like to bring to your attention that my attorney did not counsel me to his best ability, for one he lied to me just to get a plea agreement, then he told me that I would do 4 and a half years and go up for parole which I find out is not true because I have a violent, most serious charge which he failed to inform me on and when I wanted to go to trial he told me he wasn't going to fight for me just lose and that a plea deal was my only choice. There is no physical evidence in my case what so ever. I asked for my exculpatory evidence and never received it and made a complaint about my due process. If you would take a look at some of the convictions in my jurisdiction on the same charge you would see that people who have physical evidence on them caught probation and they don't even have to register for a life time. I was sentenced to 15 years 85% and I have to register for a life time, that a harsh punishment, I have no physical evidence in my case. I want to appeal my plea for ineffective counsel and harsh punishment. I ask that you review my case and keep me informed on the progress please.

Thank you sincerely

Jeremy Pearce

1-11-21

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SC Court of Appeals

My due process is being violated, I'm trying to do the correct procedural due process. Before a Criminal defendant can be punished one must be given a legitimate opportunity to contest the charges against them. A common expression that describes substantive due process is that the punishment must fit the crime. So how can something as a ~~Criminal-sexual conduct~~ and incest charge be denied bond when the victims are not pursuing the charges and the victim advocate cant even contact them? Why do I feel that my appointed solicitor and Judge Brown are working in ~~Kolhoosts~~? The fourteenth amendment also has a due process clause which provides; nor shall any state deprive any person of life, liberty or property without due process of law.

"Due process requires the state to disclose (EXCULPATORY) information that is tending to show that the defendant is not guilty!"

Due process may be violated if a prosecutors arguments include repeated factual errors. (Bond Hearing) Majority of the things the prosecutor said at my bond hearing was false and misleading in which me and my attorney can go back and point out and prove.

Due process requires that defendants have a fair opportunity to present evidence roles that unduly impinge on that right

(Preventing a defendant from offering evidence that another person committed the crime with which the defendant is charged) are invalid.

FLORENCE COUNTY, S.C.
 DEPT. OF PROBATION & PAROLE
 DORIS POULOS O'HARA
 1201
 JAN 21 11:24 AM '22

FILED

Sincerely

Jeremy Pearce

State of:	South Carolina
County of:	Florence
Subscribed and sworn to (or affirmed) before me this	17 th day of February in the year 2021
Signature of Notary Public	<i>[Signature]</i>
My Commission Expires	June 28, 2027

CERTIFIED: A TRUE COPY
[Signature]
 CLERK OF COURT C.P. & G.S.
 FLORENCE COUNTY, S.C.

Jermoy Pearce #344188
Kirkland A & E
4344 Broad River RD
Columbia SC. 29210



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SC Court of Appeals

The South Carolina Court of Appeals
P.O. Box 11624
Columbia SC. 29211

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