

**COURT OF APPEALS OF GEORGIA**  
**DOCUMENT RETURN NOTICE FOR BRIEFS OR MOTIONS**

March 5, 2015

**To:** Mr. Lyle Vincent Anderson, 1119 Trammell Street, Dalton, Georgia 30720

**Docket Number:** A15A0998     **Style:** Lyle Anderson v. The State

Your document(s) is (are) being returned for the following reason(s).

1.  Your Appellant's Brief, was not accompanied by the statutory filing fee (\$300.00 civil; \$80.00 criminal \*Effective July 1, 2009) or a sufficient pauper's affidavit. OCGA§5-6-4 and Rule 5 **Please be advised that your pauper's affidavit should be notarized by a notary public.**
2.  A Request for Oral Argument must be filed as a separate document. Rule 28 (a) (3)
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17.  The Motion to Supplement has not been granted.
18.  Other: \_\_\_\_\_

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IN THE COURT OF APPEALS  
STATE OF GEORGIA

STATE OF GEORGIA

No. A15A0998

v.

L. VINCENT ANDERSON  
Defendant/ Appellant

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COURT OF APPEALS  
STATE OF GEORGIA

APPELLANT'S BRIEF

COMES NOW Appellant in the above case, and shows the following:

Part One. Statement of Proceedings Below.

1. The indictment (R 5-7) alleged not only two dates on which Appellant committed forgery, but twice quoted the statute to include "possession" of a (forged) document as within its scope.
2. To preclude the apparent failure of his not-yet-hired counsel, Jerry Moncus, to grasp this point, Appellant filed a special demurrer on April 10, 2014 to educate counsel on the origin of the "forgery" claim five days before the underlying civil

2. While it may also appear that Appellant was "unprepared" for that hearing, he *could not* have proceeded under the circumstance that he faced, of an unexplained noncompliance with his subpoena(s) for the very materials Moncus had failed to read, per Part One *passim*.

3. By the time of Appellant's motion to reconsider her denial of the principal motion, the judge had received both his "accepted" evidentiary materials (R 86- 108) and the underlying "trial preparation" materials referenced therein, which were not accepted into the Record. Quite aside from Appellant's ex-translator's failure to preserve a copy of the latter, the cross and direct examinations are not self-explanatory to this Court, without the emails that are merely referenced by blanks between the various parentheses. It was not Appellant's fault that they were not produced, but certainly imputes bad faith to Moncus (not to mention his purloining of at least \$900 from Appellant's pocket, after advising him that same was "not safe" at the jail) as two deputies were waiting to put him in handcuffs. If Moncus had not looked at those materials before trial, he had custody of