

STATEMENT OF ISSUES

1. Was Petitioner's arguments raised in proper form and venue?
2. Did Judge err in failing to apply Federal statutes where State statute did not exist?
3. Did Judge take into consideration that S.C. Depart. of Corrections, Ridgeland facility and all other SCDC facilities being short of Staff, overcrowded inmate population, lack of clean air and cleaning supplies?
4. Did the Judge take into consideration the fact that my mother has a life threatening illness which require her to rely upon Respiratory Breathing Machine, and she has custody of my two (2) children ages 14 and 15?
5. Did the Judge take into consideration that my wife is currently in the custody of Immigration Detention facing deportation, she has custody of my other two (2) children ages 15 and 16?
6. Did Courts fail to acknowledge Covid-19 as a condition in the language of statute governing "compassionate release in S. Carolina?

Petitioner has contracted Covid-19 which has proved to be a life threatening illness, under unpredictable circumstances. The World, including the (BOP) has acknowledged the dangers of over-crowded confinement, cause the "Cares Act" to be amended and effective. South Carolina has no State statute with language governing release after Covid-19 to inmates. The substantial risk that presents on a consistent basis lead to a Motion for "Compassionate Release".

Petitioner is moving the Courts for a compassionate release in accordance with the language of the "Cares Act"(Section 12003(b)(2). Petitioner argues the supremacy clause gives rise to the rights, which have ben violated in accordance with S.C. Constitution Art. I §15. The State has raised their objection, stating petitioner's arguments are not in the proper venue to receive the relief he seeks. The State contends South Carolina has a governing statute regarding compassionate although does not acknowledge the Covid-19 pandemic, as the Cares Act.

STATEMENT OF CASE

Petitioner is an inmate in the South Carolina Department of Corrections (SCDC), governed by §24-1-20. After serving 15 years of a 28 year sentence for drug trafficking, petitioner filed a Motion for Release Under Extraordinary circumstances with Horry County.

In 2021, petitioner submitted a letter to the Department of Probation, Parole, and Pardon Services requesting a "compassionate release due to extraordinary circumstances" [Cares Act §12003(b)(2)]. The DPPP denied petitioner's request. Petitioner wrote a similar request to the Warden of the Institution.

After being denied, petitioner filed the motion in Horry County, the county of conviction. An oral hearing was conducted before the Honorable Judge Cothran on April 16, 2022. Defendant raised their argument using language in the S.C. Const. Art. I§15, "Cruel & Unusual Punishment". Petitioner argued he was entitled to relief under "extraordinary circumstances" in the (Cares Act). the deprivation of his constitutional rights initiated the (Supremacy Clause), Supreme Law of the Land. Petitioner directed his argument to the factual basis of the Department of Correction's inability, uniformed by negligence, to meet the statutory standards placed in (§24-1-20). Also that he is the only legal guardian of his children, succeeding his mother whom has a terminal illness. Judge Cothran stated the courts had no jurisdiction to grant petitioner's relief. A re-hearing was conducted in Horry County before the Honorable William Seals, Jr. His opinion was similar to Judge Cothran, and so the motion was denied. *Following this Motion file in Appeal court Honorable Chief William denied Rule 241 O/V Oct 26, 2022.*

STANDARD OF REVIEW

Unless the parties otherwise provide, "the question of arbitrability of a claim is an issue for judicial determination" [Zabinski v. Bright Acres Assocs, 346 S.C. 580, 596; 553 S.E.2d 110, 118 (2001)]. Determinations of arbitrability are subject to de novo review, but if any evidence reasonably supports the circuit court's factual finding this court will not overrule those findings. [Stokes v. Mebro Life Ins. Co., 351 S.C. 606, 609-10; 571 S.E. 2d 711, 713 (Ct. App 2002)].

An appellate court reviews the circuit court's ruling is based upon an error of law, such as application of the wrong legal principle; or when based upon factual conclusions, the ruling is without evidentiary support; or when the circuit court is vested with discretion, but the ruling reveals no discretion was exercised; or when the ruling

STANDARD OF REVIEW (cont.)

does not fall within range of permissible decisions applicable in a particular case, such as it may be arbitrary and capricious.

S.C. Code Annotated §17-15-50; "Amendment of Order" states "The Court with jurisdiction of the offense, at any time after notice and hearing, may amend the order to impose additional or different conditions of release.

S.C. Const. Art. I §15 addresses the cruel and unusual standard. Const. Art. I §8 addresses judicial discretion in sentencing, also acknowledging the restrictions of legislatures by state and federal statutes alike.

ARGUMENT I

The South Carolina Constitution gives the judge of the court discretionary power to conduct the subject matter and its constitutionality.

Petitioner argued the Agency, South Carolina Department of Corrections (DOC) does not provide, and institute policies regarding Covid-19 protocol. The Agency provided a copy of protocol they have in place, and in doing so, created a question of law as to whether Agency (DOC) has instituted the protocols to meet the statutory provisions set by the "Declaration of Policy Statute" in the 1976 Code Annotated §24-1-20.

Petitioner argues the (DOC) have not implemented these policies which would violate the §24-1-20 statutory provision, infringing petitioner's right under the South Carolina Const. Art. I §15, "Prohibition of Cruel and Unusual Punishment".

Petitioner addressed these concerns with an Agency Warden and the Department of Probation, Parole and Pardons, which is vested the power of clemency through §24-21-920 of the SC Code 1976 Annotated.

After petitioner has gone through the procedural process of notifying and petitioning the Agency, the Agencies have a responsibility to, at least, review claims and make proper corrections to claims. The argument that they have not, in favor of petitioner, creates a question of law eligible for review under the jurisdiction of the courts presiding over the case of petitioner.

ARGUMENT II

"Except in matters governed by the Federal Constitution or by Acts of Congress, the law to be applied in any case is the law of the State". [Erie R.R. Co. v. Tompkins, 304 U.S. 64, 78; 58 S.Ct. 817; 82 L.Ed. 1188 (1938)].

"And whether the law of the State shall be declared by its legislature in a statute or by its highest court in a decision is not a matter of Federal concern. There is no federal common law. id]

Petitioner argues the Supremacy Clause provides the "preemption doctrine". In regards to the State preemption is compelled whether Congress command is explicitly stated in the Statute's language or implicitly contained in its structure.

In this particular case, petitioner raises the argument of the unconstitutionality of the "Operation" of (DOC), not its ruling/governing statute(s). That the (DOC) is operating under extraordinary circumstances which would be over-crowded, and understaffed during the Covid-19 pandemic.

At the very least, the Courts have an obligation, powered by the Constitution, to review claims of constitutional infringement, which was properly identified through hearings and notice to the (DOC).

Judicial intervention is most necessary when the constitutional rights of a person is infringed upon, in accordance with S.C. Const. Art. I§15. In petitioner's Motion for Release Under Extraordinary Circumstances, he pleaded with the courts to use powers of a federally enacted law that Congress intended to help prisoners and families during and after the Covid-19 pandemic.

The BOP explicitly states its reasoning to the amended Cares Act. South Carolina does not provide similar relief for their prisoners in fact have no regulation or statutes to combat Covid-19 while understaffed and overcrowded. The Circuit Judge's ruling were in fact conceived in error of law.

The State argued the courts had no jurisdiction on the matter, which was a premature argument. The subject matter was never reviewed through facts and questions of law. The State raised claim to having a statute that addresses sentence reductions, but failed to mention Covid-19 protocols were not amended within its language. Herein lies the error of law.

ARGUMENT II (cont.)

S.C. Const. Art. V §11 vests the circuit court with original jurisdiction in civil and criminal cases, and shall have appellate jurisdiction as provided by law. The Court's claim of no jurisdiction is a clear abuse of discretion.

CONCLUSION

In conclusion, Petitioner argues Motion for Compassionate Release Under Extraordinary Circumstances was argued in the proper form and venue. Circuit Judges have an obligatory duty to review any and all constitutional infringements, specifically those of prisoners, in this case.

The Federal Cares Act preempts State law due to its conflict of interest, explicitly the fact that South Carolina does not provide Covid relief to Prisoners, even under the extraordinary circumstances of over-crowding and short of staff.

Petitioner's specific relief would be that the petition be reviewed through facts of law and circumstance. Petitioner asks that the S.C. Supreme Court reverse and remand with an opinion.

Injunctive Power!!!!!!

James Goss

Nov. 4. 2022

~~CONFIDENTIAL~~

A. South Carolina Constitution Article XII § 2 articulates specific requirement concerning the manner by which the State must treat its prisoners.

In the early 1970's, the General Assembly and the people of this State amended the South Carolina Consitution to mandate that the State provide specific services to its prisoners, The amendment reads as follows:

Article XII

§2. Institutions for confinement of persons convicted of crimes.

The General Assembly shall establish institutions for the confinement of all persons convicted of such crimes as may be designated by law, and shall provide for the custody, maintenance, health, welfare, education, and rehabilitation of the inmates.

In order to understand the meaning of any legal statute or phrase of law, it is necessary to determine the meaning of the language as it is used in the particular context. [Robinson v. Shell Oil Company, 117 S.Ct. 843, 846 (1977)].

[1] Our first step in interpreting a statute is to determine whether the language at issue has a plain and unambiguous meaning with regard to the particular dispute in the case. Our inquiry must cease if the statutory language is unambiguous and "the statutory scheme is coherent and consistent". [U.S. V. Ron Pair Enterprises, Inc., 109 S.Ct. 1026, 1030 (1989); see also Connecticut Nat. Bank v. Germain, 112 S.Ct. 1146, 1149-50 (1992)].

Article XII § 2 utilizes the words "shall provide..." In this context, "shall" is mandatory. [U.S. v. Myers, 106 F.3d 946, 941 (CA10 1997)].

[13]...It is basic canon of statutory construction that the use of the word "shall" indicates a mandatory intent. [Association of Civilian Technicians v. Federal Labor Relations Auth., 22 F.3d 1150, 1153 (D.C. Cir. 1994)].

While the focus of this argument is on the constraints placed on the legislature to provide meaningful rehabilitation to the State's prisoners, it should be noted that Art. XII § 2 stands as a command and State Constitutional guarantee.

The legal meaning of Rehabilitation is found in Black's Law Dictionary (6th ed. 1990), which states:

Investing or clothing again with some right, authority or dignity. Restoring person or thing to a former capacity; reinstating; qualifying again. Restoration of individual to his greatest potential, whether physically, mentally, socially or vocationally.

Accordingly, there can be no doubt that rehabilitation in the context of Article XII § 2 means restoring the prisoner to a capacity where he can physically, mentally, socially and vocationally reenter society as a productive member.

Futhermore, to ensure that the commands of the Constitution were abided by, the General Assembly and the people of South Carolina left no doubt as to their intentions in this regard by placing severe restrictions on the activities of all branches, agencies departments, and subdivisions of state government, thus limiting their authority only to that allowed by the Constitution.

Article 1

§ 23. Provisions of Constitutional Mandatory

The provisions of the Constitution shall be taken, deemed, and construed to be mandatory and prohibitory, and not merely directory, except where made directory or permissory by its own Constitution.

Hence, the Consitution of South Carolina is a limitation upon, rather than a grant of, legislative powers. [Smith v. Roberson, 210 S.C. 99, 41 S.E.2d 631 (1947)]. In other words, the government must abide by and is limited to the terms granted to it in the Constitution.

Although the commands of the Constitution are quite clear, there exists some confusion over the court's interpretation of this Constitutional Amendment because of two citations under the

case notes of Article XII § 2. The citations are from a case brought under the Post Conviction Relief Statute of South Carolina in McLamore v. State, 257 S.C. 413, 186 S.E.2d 250 (1972), which states:

"There is no duty to educate or rehabilitate prisoners. Certain constitutional rights follow a person into confinement, but there is no constitutional duty imposed on any governmental entity to educate or rehabilitate him".

It's not a requirement of the due process and equal protection clauses of either the State or the United States Constitution, that if the State undertakes to provide rehabilitation facilities, it must provide such facilities to all prisoners or to none.

However, McLamore was brought in 1969 under South Carolina Constitution Article XII § 6 which at the time was entitled and read as follows:

Convicts sentence to hard labor:

All convicts sentenced to hard labor, by any of the courts in this State, may be employed upon the public works of the State or of the Counties and upon the public highways".

A clear reading of the present South Carolina Constitution shows that Article XII § 6 was repealed at the time of the enactment of Article XII § 2. Therefore, at the time McLamore filed his action, Article XII § 2 did not exist as it is written today otherwise that case would have been decided differently. In light of these facts, once the commands of the South Carolina Constitution are given proper consideration, there is an unavoidable conclusion that the State **must** provide rehabilitation for its prisoners.

B. A due process analysis of the South Carolina Constitution requires a different interpretation of substantive procedural

due process, equal protection and the ban against cruel and unusual punishment, than that which is required under the United States Constitution.

1.

Like every other article, clause, phrase or word in the Constitution, Article XII § 2 of the South Carolina Constitution is a command. It is not meaningless phraseology without specific intent and purpose. The State Constitution does not allow the legislature unbridled authority in the passage of laws.

The General Assembly may only enact laws that are not expressly or by clear implication, prohibited by the Constitution. Elliot v. McNair 250 S.C. 75, 156 S.E.2d 421 (emphasis added).

In other words, the legislature must abide by and is limited to the terms granted to it in the Constitution, because the Constitution is the supreme law. Anton v. S.C. Coastal Council, 469 S.E.2d 604 (1996). (emphasis added)

...where there is a conflict between a statute and the State Constitution, the Constitution overrides the statute. State v. Whitener, 225 S.C. 244, 81 S.E.2d 784 (1954).

Simply put, the General Assembly made a contract with the people and prisoners of this state to ensure that the prisoners would receive sufficient rehabilitation during their incarceration. Thus, ensuring them a greater chance at being a successful and productive citizen if released back into society.

This constitutional obligation cannot be abridged or avoided simply by the passage of more restrictive sentencing laws. The passage of any restrictive sentencing laws that alter, deny or otherwise interfere with the commands of the Constitution, make the law unconstitutional.

Hence, Article XII § 2 is equivalent to a constitutional contract in which State prisoners have a liberty and property interest that must be honored. Logan v. Zimmerman Brush Co., 455 U.S. 422, 430-31 (1982); see also Ken Moorhead Oil Co. v. Federated Mut. Ins., 476 S.E.2d 481, 485 (SC 1996).

Therefore, South Carolina Constitution Article XII § 2 limits legislative authority to "provid[ing] for the custody, maintenance, health, welfare, education and rehabilitation of the inmates" in order to ensure that any prisoner returned to society would be "physically, mentally, socially [and] vocationally" prepared to be a productive member of society. (Jones v. Grinnel Corp., 362 A2d 139, 143). Any attempt by the legislature or other department or agency to abridge this right is unconstitutional. In other words, the legislature cannot avoid its constitutional duty by "putting slippage in the joints" that allows a state department or agency to do what the legislature is forbidden to do by giving that department or agency "unbridled discretion" in its decision making process. [U.S. Outdoor Advert. Inc. v. S.C. Dept. of Transportation, 481 S.E.2d 112, 113 (1997)].

[2, 3] An administrative regulation is valid so long as it is reasonably related to the purpose of the enabling legislation. [Hunter & Walden Co. v. S.C. State Licensing Bd. of Contractor, 272 S.C. 211, 251 S.E. 2d 186 (1978)]. However, although regulations have the force of law, they may not alter or add to the terms of a statute. Goodman v. City of Columbia, 318 S.C. 488, 458 S.E.2d 531 (1995); Society of Prof'd Journalist v. Sexton, 382 S.C. 563, #24 S.E.2d 313 (1984)].

Hence, any law passed by the legislature which denies or interferes with a prisoner's rehabilitation, or any delegation of authority to any state agency which does the same is unconstitutional.

2.

It is undisputed that under the United States Constitution although states must provide the basics to a prisoner, Estell v. Gamble, 97 S.Ct. At 290-91, they are not required to rehabilitate them. Williams v. McGinnis, 755 F.Supp. 230. However, unlike the federal consstitution, the South Carolina Constitution does require that prisoners be rehabilitated. Accordingly, federal rights can flow from a court's interpretation of a state constitution. [Mathis v. Eli Lilly and Co. 719 F.2d 134, 137 (1983)].

When presented with challenge to constitutionality of state statute under State Constitution, federal court must look to the decision of the state Supreme Court and, if there are none, must determine how the state Supreme Court would rule if presented with the same issue.

Hence, when a court takes into consideration the fact that the South Carolina Constitution demands rehabilitation for its prisoners and that this Constitution, itself, is a mandate to government from the people, the federal constitution takes on a different meaning. When a state violates its own constitution and the mandates of its people, that would be "truly irrational" in violation of substantive due process. [Thompson v. Ellenrecker, 935 F.Supp. 1037, 1040 (DCSC) 1995)].

The Eighth Circuit explained "[a] plaintiff asserting a substantial Due Process claim must establish that the government action complained of is "truly irrational", that is something more than... arbitrary, capricious, or in violation of state law. Anderson v. Douglas County, 4 F.3d 574, 577 (8th Cir. 1991)].

Moreover, the Eighth Amendment to the U.S. Constitution must also take on a different meaning since the people set the minimum standards of civilized decency in South Carolina by mandating rehabilitation as part of their Constitution. [Tropp v. Dulles, 78 S.Ct. 590, 598 (1958)]. The basic concept underlying the Eighth Amendment is nothing less than the dignity of man. The Amendment must draw its meaning from the evolving standards of decency that mark the progress of a maturing society.

Finally, the Equal Protection clause also requires more protection as South Carolina has elevated its prisoners to a protected class. Any legislation enacted that denies rehabilitation to them must be judged under **strict scrutiny**. Personnel Adm's of Mass. v. Feeney, 99 S.Ct. 2282; Feeney v. Comm. Of Mass., 475 F.Supp. 109, affirmed 100 S.Ct. 1075 (1980).

The problem in South Carolina can be summed up in one case: *Brown v. Evatt*, 470 S.E.2d 848, 851 (1996). The federal constitution vest no liberty interest in inmates retaining or receiving any particular security or custody status as long as the challenged conditions or degree of confinement are within the sentence imposed and are not otherwise violative of the constitution. (*Sandin v. Conner*), 115 S.Ct. 2293 (1995); *Slezak v. Evatt*, 21 F.3d 590 (4th Cir.). Within these limits and custody classification of state prison inmates is a matter for state prison official discretion whose exercise is not subject to federal procedural due process constraints. (*Sandin v. Conner, Supra*). Nonetheless, a liberty interest in state inmates to retain or attain a particular security or custody classification may be created by state law which places substantive limitations on official discretion. However even if a state law regime mandates both a detailed procedural process for making classification decisions and substantive criteria to be used in making those decisions, no constitutionally protected liberty interest is created if the regime either the primary decision maker or any reviewing authority is authorized to override, as a matter of discretion, any classification suggested by application of the prescribed substantive criteria. (*Slezak v. Evatt, Supra*). Holding that Brown had no liberty interest because "neither the state statutes which creates and defines the powers of SCDC's operational classification regulations create the required liberty interest". it is important to note that Brown brought his case under the United States Constitution without asking the court to consider the mandates of South Carolina Constitution Article XII § 2. Had Brown brought his claim under Art. XII § 2, the state would have been forced to implement procedures which are outcome determine by placing "substantive limitations on official discretion and a detailed procedural process for making classification decisions" along with a substantive criteria to be used in making those decisions as required by the mandatory language of Art. XII § 2. Once the allegations contained in the Plaintiff's Complaint along with the law and practices contained in the facts of this brief (*infra*) are given proper consideration, it is clear that the legislature has violated the commands of the state and federal constitution by passing laws which directly deny prisoners of access to meaningful rehabilitations programs. They have further violated the constitutions by passing laws which allow

or create "sippage in the joints" which permits the Department of Corrections and Parole Board to deny rehabilitation to prisoners by using "unbridled discretion" and no "detailed procedural process" or "substantive criteria" upon which their decisions must be made. Since the legislature has clearly exceeded the scope of authority granted to it by the Constitution, the conditions of confinement must be corrected as a matter of law. SCDC cannot save my life because so many people have died because shortness of staff. I need to be Released Under Extraordinary Circumstances due to under-staffing for more than 10 years. My life matters and I don't want to die and be forgotten about, like the rest of the inmates that die in SCDC. *The law makers and Gov. has neglected duties of short of staff for over 15 years causing me to catch Covid-19.*

Jamie Goss

Jamie Goss

ATTACHMENT

As to Issue I, this court erred in concluding that Appellant is not entitled to Compassionate Release for Extraordinary Circumstances due to Covid-19. When South Carolina Department of Corrections, (herein after SCDC) has shown failures to adequately prevent, address and respond to Covid-19 pandemic. The substandard patterns or practices within SCDC, in which this court is aware of these deficiencies, i.e. overcrowding, short of staff, including but not limited to security, medical and mental health staff, which are the three main components in administering the Covid protocols.

Futhermore, SCDC is very much aware of their failures to correct these substandard patterns or practices which would lead to serious bodily and or mental injury.

The Covid-19 pandemic is still very much alive within SCDC and it is a health hazard due to all the above reasons stated.

Furthermore, SCDC's reponse is lock-down 24/7. Appellant's rights to be free from the threat of the Covid-19 pandemic under the amendments to the Constitution of the United States are being overlooked by this Court.

SCDC's response to the pandemic is problematic to the morale and overall mental health of prisoners systemwide.

Fact finders have shown that SCDC has substantially fallen below the ACA standard of a modern prison.

There is a substantial risk of harm with overcrowding, and remaining in close quarters during this pandemic. Quarantine has the effect of raising the risk due to shortage of staff in the medical and security divisions.

When systematic deficiencies in staffing facilities, or procedures make unnecessary suffering inevitable, a court should not hesitate to use the injunctive power. Todaro vs. Ward 565 F.2d 48, 52 (2nd Cir. 1977). The overcrowding and understaffing within SCDC has exposed Appellant to a constitutionally unacceptable substantial risk from the Covid-19 pandemic and physical violence. SCDC has manifested "deliberate indifference" toward this risk. If this court overlooks or misapprehended this issue, it too would have manifested further "deliberate indifference" toward this risk.

4. Relief Requested

Identify the precise action you want the Court of Appeals to take: See: Attachment
INITIAL BRIEF Conclusion

5. Prior appeals (for appellants only)

A. Have you filed other cases in this court?

Yes No

B. If you checked YES, what are the case names and docket numbers for those appeals and what was the ultimate disposition of each?

Rule 241 motion
Non-Dispositional Order

Jamie Goss
Signature

[Notarization Not Required]

Jamie Goss

[Please Print Your Name Here]

CERTIFICATE OF SERVICE

I certify that on Nov. 4, 2022 I served a complete copy of this Informal Brief on all parties, addressed as shown below:

William M. Blich Jr. Attorney General's
Post Office Box 11549
Columbia, SC 29211

Jamie Goss
Signature

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SC Court of Appeals

The South Carolina COURT OF APPEALS FOR *South Carolina*

DIRECTIONS FOR INFORMAL BRIEF

1. **Preparation of Brief.** The Court will consider this case according to the written issues, facts, and arguments presented in the Informal Briefs. Space is provided to present up to four issues. Additional issues may be presented by attaching additional sheets. The Court will not consider issues that are not specifically raised in the Informal Briefs. Informal Briefs must be legible and concise, and any attached pages must be sequentially numbered. Informal Briefs may be filed on the form provided or in memorandum or formal briefing format.

2. **Copies required.**

- * File the original of the Informal Brief with the Court. If you would like a stamped copy returned, send an extra copy and a self-addressed stamped envelope. The Court's address is:

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- * Send one copy of your Informal Brief to each of the parties in the case.

3. **Certificate of Service Required.** You must certify that you sent each of the other parties or attorneys complete copies of all documents you send the Court. Service on a party represented by counsel shall be made on counsel.

4. **Signature Required.** You must sign your Informal Brief and all Certificates of Service. If the Informal Brief is not signed, the case will be subject to dismissal under this Court's Rule

DOCUMENTS ARE SCANNED INTO ELECTRONIC FORM AND POSTED TO THE DOCKET. DO NOT USE STAPLES, TAPE OR BINDING.

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The State of South Carolina
In THE COURT OF APPEALS

SC Court of Appeals

INFORMAL BRIEF ON THE MERITS

In support of INITIAL BRIEF OF Appellate

RE:

1. **Declaration of Inmate Filing**

An inmate's notice of appeal is timely if it was deposited in the institution's internal mail system, with postage prepaid, on or before the last day for filing. Timely filing may be shown by:

- a postmark or date stamp showing that the notice of appeal was timely deposited in the institution's internal mail system, with postage prepaid, or
- a declaration of the inmate, under penalty of perjury, of the date on which the notice of appeal was deposited in the institution's internal mail system with postage prepaid. To include a declaration of inmate filing as part of your informal brief, complete and sign the declaration below:

Declaration of Inmate Filing

I am an inmate confined in an institution. I deposited my notice of appeal in the institution's internal mail system on Nov. 4 2022 [insert date]. First-class postage is being prepaid either by me or by the institution on my behalf.

I declare under penalty of perjury that the foregoing is true and correct (see 28 U.S.C. § 1746; 18 U.S.C. § 1621).

Signature: Jamie Goss

Date: Nov 4, 2022

2. **Jurisdiction**

Name of the court or agency from which you are appealing: S.C. Code
14-8-200 AFFORDS THIS COURT JURISDICTION TO REVIEW THIS CASE

Dates of the order or orders for which review is sought: _____

3. **Issues for Review**

Use the following spaces to set forth the facts and argument in support of the issues you wish the Court of Appeals to consider. The parties may cite case law, but citations are not required.

Issue 1.

See ATTACHMENT
INITIAL BRIEF

Supporting Facts and Argument.

See Attachment

INITIAL BRIEF

Issue 2.

See Attachment

INITIAL BRIEF

Supporting Facts and Argument.

See Attachment

INITIAL BRIEF

Issue 3.

See Attachment

INITIAL BRIEF

Supporting Facts and Argument.

See Attachment

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Issue 4.

See Attachment

INITIAL BRIEF

Supporting Facts and Argument

See Attachment

INITIAL BRIEF

Jamie Goss 294985
R-C-I / GB-55
Post Office Box 2039
Ridgeland South Carolina

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