

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Cherokee County
The Honorable R. Keith Kelly, Circuit Judge
Case No. 2021-CP-11-0593

RECEIVED

JAN 09 2023

S.C. SUPREME COURT

APPELLATE CASE NO:

Alonzo C. Jeter, III, Appellant,

vs

State of South Carolina, Respondent.

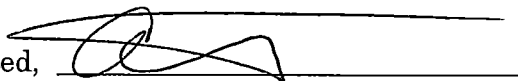
MOTION TO PROCEED IN FORMA PAUPERIS

I, Alonzo C. Jeter, III, hereby respectfully motion this Court for leave to proceed in this action without prepayment of fees, costs, or security thereof. In support of my Motion, I declare under penalty of perjury that the following facts are true:

1. I am the Appellant in this action and I believe I am entitled to redress.
2. The issues in this case are novel and are meritorious.
2. I am an incarcerated prisoner who is in-fact employed, but unable to receive pay for my employment due to South Carolina Law and the allowance of the Thirteenth Amendment of the United States Constitution.
3. Because of my poverty, I am unable to pay the costs which are associated with proceeding in this action or give security therefor.

Smith v Robbins, 528 U.S. 259, 120 Sct 746 (2000) (“[J]ustice may not be conditioned on the ability to pay.”); Griffin v Illinois, 351 U.S. 12, 76 Sct 585 (1956) (“There can be no equal justice where the kind of trial a man gets depends on the amount of money he has.”); Jones v Leagan, 384 S.C. 1,19,681 SE2d 6, 16 (2009) (“Courts have the inherent power to do all things reasonably necessary to ensure that just results are reached to the fullest extent possible.”); N.A.A.C.P. v Meese, 615 F. Supp. 200 (1985) (“One of the basic principles, one of the glories of the American system of justice is that the courthouse door is open to everyone – the humblest citizen, the indigent, the convicted felon, the illegal alien.”)

Respectfully submitted,



Alonzo C. Jeter, III
Manning Correctional Institution
502 Beckman Drive
Columbia, South Carolina 29203

This 5th day of January, 2023.