

STATE OF SOUTH CAROLINA

) Indictment Nos.: 2019-GS-46-08134

) IN THE COURT OF APPEALS

) FILED-RECEIVED

) State of South Carolina

) 2024 MAR 20 PM 3: 19

) -vs-

) ANGIE M. BRYANT

) Joseph Cale Mohr

) C.C.P. & GS

) YORK COUNTY, SC

) Defendant.

RECEIVED

MAR 25 2024

SC Court of Appeals

RULE 203(B) EXPLANATION

Pursuant to Rule 203(B)(iv), the issue to be raised on appeal is whether the court abused its discretion when it imposed the 5 years s/o 3 years probation on indictment 2019-GS-08134.

The undersigned does not have a good faith basis to believe that this issue is properly before the Court of Appeals, and the undersigned did not object to the sentence or file a motion to reconsider the sentence. Nevertheless, the undersigned consulted with the Appellant about his right to appeal, and after consultation, the undersigned has filed the instant appeal at the request of the Appellant because the Sixth Amendment requires counsel to follow the Appellant's request. *See Frazer v. South Carolina*, 430 F.3d 696, 705 (4th Cir. 2005) ("A defendant has a right to pursue a direct appeal, even if frivolous, which counsel must assist as 'an active advocate on behalf of his client.'") (quoting *Anders v. California*, 386 U.S. 738, 744 (1967)).

Respectfully submitted,



Melissa G. Rogers
P.O. Box 691
York, South Carolina 29745
(803) 628-3031
Attorney for Joseph Cale Mohr
York, South Carolina

March 20, 2024