

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

Appeal from the Administrative Law Court  
Honorable Robert L. Reibold, Administrative Law Judge  
Case N.24-ALJ-15-0023-AP

JAN 24 2025

SC Court of Appeals

Appellant Case No.2024-002022

Thomas Thompson #80681 )  
Appellant, )  
Vs. )  
S.C. Department of Probation, Parole, )  
And Pardon Services )  
Respondent. )


AFFIDAVIT

I, Thomas Thompson, do hereby swear to the following events under oath. I did on March 13, 2024 mail the attached Notice of Appeal and Certificate of Service (A1 and A2) to the Administrative Law Court (ALC) and also sent the Notice of Appeal to the General Counsel for the S.C. Department of Probation, Parole, and Pardon Services (SCDPPPS) at the addresses listed below. On or about April 12, 2024 I received notice from the ALC that my Notice of Appeal was not on the proper form. The letter stated that a proper form was attached but this was not the case. I mailed another Notice of Appeal on the only form available (B) along with the notice received from the ALC and a letter informing the ALC that the proper form was not attached and this was the only form available to the ALC and also sent the Notice of Appeal to the SCDPPPS. On or about May 14, 2024 I again received notice from the ALC that my Notice of Appeal was not on the proper form. A proper form (C) was attached. I then mailed this Notice of Appeal to the ALC and the SCDPPPS on May 14, 2024.

General Counsel, SCDPPPS  
293 Greystone Boulevard  
Post Office Box 207  
Columbia, S.C. 29202

S.C. Administrative Law Court  
Edgar A. Brown Building  
1205 Pendleton Street, Suite 224  
Columbia, S.C. 29201

January 22, 2025



Thomas Thompson #80681





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STATE OF SOUTH CAROLINA  
In The Administrative Law Court

RECEIVED  
JAN 24 2025  
SC Court of Appeals

Thomas Thompson #80681 )  
 )  
 Appellant, )  
 )  
 vs )  
 )  
 S.C. Department of Probation, )  
 Parole, and Pardon Services )  
 )  
 Respondent. )

NOTICE OF APPEAL

Notice is hereby given that Thomas Thompson #80681 does hereby appeal the final decision of the South Carolina Department of Probation, Parole, and Pardon Services dated March 8, 2024 and received on March 13, 2024, a copy of which is attached. A general statement of the grounds for appeal is:

- 1-The Case Summary Report prepared by the Department was replete with factual errors, mis-statements, and omissions to such an extent as to render the decision of the Board arbitrary and capricious.
- 2-S.C. statute law requires the Parole Board to establish factors and criteria to determine if an inmate meets the conditions for parole stated in Section 24-21-640. The letter of denial lists 24-21-640 as one of the factors or criteria.
- 3-The hearing before a four member board violates Appellant's liberty interest in a hearing before the full seven member board for parole. This violates due process.
- 4-The parole Board continues to enforce statutes passed into law after Appellant was sentenced and had become eligible for parole against Appellant in violation of the ex-post-facto clause.
- 5-Appellant, a juvenile when he committed the crime, has been subjected to a much harsher punishment than similarly situated adult offenders.

Thomas Thompson #80681  
Tyger River CI U8-216  
200 Prison Road  
Enoree, S.C. 29335

  
\_\_\_\_\_

March 13, 2024

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STATE OF SOUTH CAROLINA  
In The Administrative Law Court

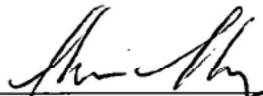
Thomas Thompson #80681 )  
Appellant, )  
vs. )  
S.C. Department of Probation, )  
Parole, and Pardon Services )  
Respondent. )

CERTIFICATE OF SERVICE

**RECEIVED**  
JAN 24 2025  
SC Court of Appeals

I, Thomas Thompson, do hereby certify that I served a copy of the Notice of Appeal on Respondent by depositing a copy of same in the US Mail, postage prepaid, on this day addressed as follows;

S.C. Department of Probation, Parole and Pardon Services  
293 Greystone Boulevard, Post Office Box 207  
Columbia, South Carolina 29202

  
\_\_\_\_\_  
Thomas Thompson #80681  
Tyger River CI 10-103  
200 Prison Road  
Enoree, South Carolina 29335

March 13, 2024

13

STATE OF SOUTH CAROLINA  
ADMINISTRATIVE LAW COURT

\_\_\_\_\_, )  
Appellant, )  
vs. )  
South Carolina Department of Corrections. )  
Respondent. )

DOCKET NO. \_\_\_\_-ALJ-04-\_\_\_\_-\_\_\_\_

GRIEVANCE NO: \_\_\_\_\_

**NOTICE OF APPEAL**

Notice is hereby given that \_\_\_\_\_ appeals the final decision of the South Carolina Department of Corrections dated \_\_\_\_\_ and received on \_\_\_\_\_, a copy of which is attached. In accordance with Rule 59(B) of the Rules of Procedure for the South Carolina Administrative Law Court (SCALC Rules) please provide a brief factual basis for each expressly and specifically asserted constitutional violation:

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\_\_\_\_\_

Appellant's Name \_\_\_\_\_

Signed \_\_\_\_\_

Mailing Address \_\_\_\_\_

Dated \_\_\_\_\_

City, State, Zip Code \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that I, \_\_\_\_\_ (your name), on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, in \_\_\_\_\_ (city), South Carolina, served a copy of the foregoing Notice of Appeal on all parties to this matter by depositing the same in the United States Mail, postage paid, and addressed as follows:


Name of person/Agency served: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Print your name  
(See reverse side for instructions)

Sign your name \_\_\_\_\_



Instructions for filing an appeal of the final agency decision from the South Carolina Department of Corrections:

- 1) You must complete the **Notice of Appeal** on the reverse side of these instructions and mail it to the Administrative Law Court at the following address:

**Clerk's Office  
South Carolina Administrative Law Court  
1205 Pendleton Street, Suite 224  
Columbia, SC 29201**

A copy of the Notice of Appeal must also be forwarded to the Office of General Counsel at the Department of Corrections.

- 2) **In order for your case to be processed by the ALC, a copy of the final decision from the Department of Corrections must be attached to the Notice of Appeal.**

STATE OF SOUTH CAROLINA  
ADMINISTRATIVE LAW COURT

C

\_\_\_\_\_, )  
 )  
Appellant, )  
 )  
v. )  
 )  
South Carolina Department of Probation, )  
Parole and Pardon Services, )  
 )  
Respondent. )  
\_\_\_\_\_ )

Docket No. \_\_\_\_-ALJ-15-\_\_\_\_-AP

**NOTICE OF APPEAL**

Notice is hereby given that \_\_\_\_\_ appeals the final decision of the South Carolina Department of Probation, Parole and Pardon Services dated and received on \_\_\_\_\_, a copy of which is attached. In accordance with Rule 59(B) of the Rules of Procedure for the South Carolina Administrative Law Court (SCALC Rules) please provide a brief factual basis for each expressly and specifically asserted constitutional violation:

\_\_\_\_\_  
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Appellant's Name \_\_\_\_\_

Signed \_\_\_\_\_

Mailing Address \_\_\_\_\_

Dated \_\_\_\_\_

City, State, Zip Code \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that I, \_\_\_\_\_ (your name), on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_, in \_\_\_\_\_ (city), South Carolina, served a copy of the foregoing Notice of Appeal on all parties to this matter by depositing the same in the United States Mail, postage paid, and addressed as follows:

Name of person/Agency served: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Print your name  
(See reverse side for instructions)

Sign your name \_\_\_\_\_

Instructions for filing an appeal of the final agency decision from the South Carolina Department of Probation, Parole and Pardon Services:

- 1) You must complete the **Notice of Appeal** on the reverse side of these instructions and mail it to the Administrative Law Court at the following address:

**Clerk's Office  
South Carolina Administrative Law Court  
1205 Pendleton Street, Suite 224  
Columbia, SC 29201**

A copy of the Notice of Appeal must also be forwarded to the Division of Legal Services at the Department of Probation, Parole and Pardon Services at the following address:

Division of Legal Services  
~~S.C. Dept. of Probation, Parole & Pardon Services~~  
293 Greystone Boulevard  
Post Office Box 207  
Columbia, SC 29202

- 2) **In order for your case to be processed by the ALC, a copy of the final decision from the Department of Probation, Parole and Pardon Services must be attached to the Notice of Appeal.**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from the Administrative Law Court  
Honorable Robert L.Reibold, Administrative Law Judge  
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Appellant Case No.2024-002022

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Thomas Thompson #80681 )  
Appellant, )  
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And Pardon Services )  
Respondent. )

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CERTIFICATE OF SERVICE

I, Thomas Thompson #80681, do hereby certify that I served a copy of the Affidavit dated January 22, 2025 on Respondent by depositing a copy of same in the US Mail, postage prepaid, on this day addressed as follows;

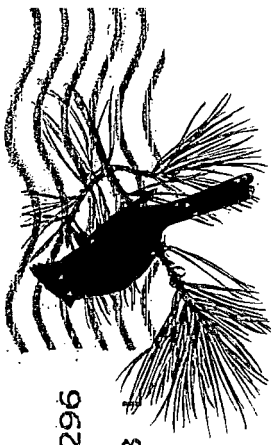
General Counsel, SCDPPPS  
293 Greystone Boulevard  
Post Office Box 207  
Columbia, S.C. 29202



Thomas Thompson #80681  
Tyger River CI 10-103  
2100 Prison Road  
Enoree, S.C. 29335

January 22, 2025

Thomas Thompson #80681  
Tyger River CI 10-103  
200 Prison Road  
Enoree, S.C. 29335



FOREVER / USA

GREENVILLE SC 296  
22 JAN 2025 PM 3

**RECEIVED**

JAN 24 2025

SC Court of Appeals

Jenny Abbott Kitchings  
S.C. Court of Appeals  
Post Office Box 11629  
Columbia, S.C. 29211

Received

JAN 22 2025

Tyger River Mailroom

LEGAL

29211-162929

