

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal From Richland County Court of Common Pleas  
The Honorable Kristi F. Curtis, Circuit Court Judge  
The Honorable Daniel Coble, Circuit Court Judge

RECEIVED

APR 17 2025

SC Court of Appeals

Case No. 2024-CP-40-01737

CASE NO.

Alonzo C. Jeter, III, .....APPELLANT,

V

State of South Carolina; Alan McCrory Wilson;  
Chelsey F. Marto; Joseph Derham Cole; J. Mark  
Hayes, II; Ralph Keith Kelly; Brandy W. McBee;  
Tonnya K. Kohn; Jean Hoefer Toal; Donald D.

Beatty, .....RESPONDENT.

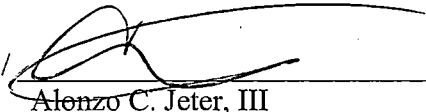
AFFIDAVIT OF GOOD FAITH

Appellant, Alonzo C. Jeter, III, provided this Affidavit of Good Faith and states as follows:

1. Appellant, in good faith, believes the appeal which he files, is non-frivolous and is proper for the Court to consider; and
2. Appellant, in good faith, believes that it is equitable that Appellant, being a pauper not by his own will and accord - but rather due to the provisions within State law and the United States Constitution which prevent Appellant from receiving pay for his employment within the South Carolina Department of Corrections, would be afforded equal access to the judicial system by leave of this Court that he proceed in this action in forma pauperis. Appellant would remain without legal remedy if such privilege is not afforded; and
3. Appellant believes the issues which this case explores are novel and are in public interest and are of public importance.

Respectfully submitted,

S/



Alonzo C. Jeter, III  
APPELLANT / pro se

Lee Correctional Institution  
990 Wisacky Hwy.  
Bishopville, South Carolina 29010

This 14<sup>th</sup> day of April, 2025

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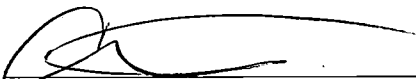
Beatty, .....RESPONDENT.

CERTIFICATE OF MAILING AND SERVICE

I, Alonzo C. Jeter, III, an inmate confined in an institution, hereby certify under penalty of perjury under the laws of the United States of America that I have mailed the (1) Notice of Appeal (2) Motion To Proceed In Forma Pauperis and Memorandum In Support, (3) Affidavit of Good Faith, and (4) Motion for Judicial Notice; to the South Carolina Court of Appeals and the Richland County Clerk of Court; and that I have also served a copy of the same on the Defendants; by placing an original and a copy inside of envelopes and by placing the said envelopes in possession of Lee Correctional Institution's mailroom personnel by depositing into the institution's internal mailing system on this 14<sup>th</sup> day of April, 2025, for mailing via the United States Postal Service, (first-class postage was prepaid either by me or by the institution on my behalf), addressed as follows:

Office of the Court, South Carolina Court of Appeals, Post Office Box 11629, Columbia South Carolina 29211; Office of the Clerk, Richland County Judicial Center, 1701 Main St., Post Office Box 2766, Columbia South Carolina 29201; J. Emory Smith, Jr., Deputy Solicitor General, Office of the Attorney General, Post Office Box 11549, Columbia South Carolina 29211; L. David Leggett, Assistant Attorney General, Office of the Attorney General, Post Office Box 11549, Columbia South Carolina 29211;

I declare under penalty of perjury that the foregoing is true and correct.

S/   
Alonzo C. Jeter, III

April 14, 2025

Alonzo C. Jeter, III, #282902  
Lee Correctional Institution  
990 Wisacky Hwy.  
Bishopville, South Carolina

The Honorable Jenny A Kitchings, Clerk  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Alonzo C. Jeter, III v State of South Carolina et al  
Case No


Dear Ms. Kitchings:

Enclosed for filing, please find the (1) Notice of Appeal (*with attached Orders for Appeal*), (2) Motion To Proceed In Forma Pauperis and Memorandum In Support, (3) Affidavit of Good Faith, (4) Motion for Judicial Notice, and (5) Certificate of Mailing and Service.

Please find also enclosed, an additional copy of the same along with a self-addressed stamped envelope ("SASE"). Please return to me, by way of this SASE, filed-stamped copies of these said documents.

Thank you for your assistance in this matter.

Sincerely,

  
Alonzo C. Jeter, III

CC: (without attachments)  
Richland Clerk of Court  
J. Emory Smith  
L. David Leggett

**FILE**

LEE CHEN MATH



Alonzo C. Jeter, III, #282902  
Lee Correctional Institution  
990 Wisacky Hwy.  
Bishopville, South Carolina 29010

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SC Court of Appeals

The Honorable Jenny A. Ritchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

