

THE STATE OF SOUTH CAROLINA  
In the Appellate Court

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APPEAL FROM GREENVILLE COUNTY  
Court of General Sessions

Jessica Ann Salvini, Circuit Court Judge

Indictment No(s).: 2025GS23008385  
Warrant No(s).: 2024A2330209121

RECEIVED  
FEB 24 2026  
SC Court of Appeals

The State,

v.

Respondent.

Izel Mario Paul,

Appellant.

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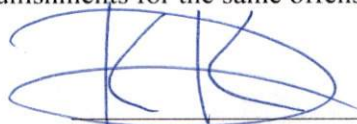
**Rule 203 Explanation of Issue**

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As required by Rule 203(d)(1)(B)(iv), SCACR, undersigned counsel submits the following explanation of the issue that may be raised on appeal. Mr. Paul contends the circuit court erred in denying him credit for time served prior to sentencing pursuant to Section 24-13-40(3) of the South Carolina Code, which provides that "credit for time served prior to trial and sentencing shall not be given: . . . when the prisoner commits a subsequent crime while out on bond."

Mr. Paul argues that the statute violates the Double Jeopardy and Due Process Clauses of both the United States and South Carolina Constitutions. By depriving Mr. Paul of credit for pretrial detention toward his sentence, the statute constitutes multiple punishments for the same offense.

Date: February 19, 2026



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Kaitlin Diaz, Esq.  
Greenville County Public Defender  
305 East North Street, Suite 123  
Greenville, SC 29601  
Attorney for Appellant

Other Counsel of Record:  
Caroline Kneece  
Thirteenth Circuit Solicitor Office  
305 E. North Street, Suite 325  
Greenville, SC 29601  
Attorney for Respondent

WITNESSES

*[Handwritten signature]*

Greenville County Sheriff's Office

10/28/2024

ARREST WARRANT NUMBER

2024A2330209121

ACTION OF GRAND JURY

TRUE BILL

*[Handwritten signature]*  
FOREMAN GRAND JURY

Foreperson of Grand Jury

VERDICT

Foreperson of Petit Jury

Date:

DOCKET NO. 2025-GS-23-

CSD

000385

The State of South Carolina

County of Greenville

COURT OF GENERAL SESSIONS

November TERM 2025

THE STATE

vs.

IZEL MARIO PAUL

Indictment for

0349

TRAFFICKING METHAMPHETAMINE

VIOLATION § 44-53-0375

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SC Court of Appeals

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF GREENVILLE )

INDICTMENT FOR  
TRAFFICKING METHAMPHETAMINE

At a Court of General Sessions, convened on

**NOV 25 2025**

the Grand Jurors of Greenville

County present upon their oath:

That IZEL MARIO PAUL did in Greenville County, on or about the 25<sup>th</sup> of September, 2024, knowingly sell, manufacture, deliver or bring into the State of South Carolina or did knowingly provide financial assistance or otherwise aid, abet, attempt or conspire to sell, manufacture, deliver or bring into the State or was knowingly in actual or constructive possession of more than 28 grams but less than 100 grams of Methamphetamine (Crank). This is in violation of §44-53-0375 of the South Carolina Code of Laws (1976) as amended.

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Against the peace and dignity of the State, and contrary to the statute in such case made and provided.



SOLICITOR

BAR # 105896

5053  
ARREST WARRANT 10-31-24  
2024A2330209121

STATE OF SOUTH CAROLINA  
 County/  Municipality of  
Greenville P169

THE STATE 01-2024-104994  
against 161994

Izel Mario Paul  
Address: Greenville, SC 29605-

Phone: SSN:  
Sex: M Race: B Height: 6 Weight: 160  
DL State: SC DL #:

DOB: Agency ORI #: SC0230000

Prosecuting Agency: Greenville County Sheriffs Office  
Prosecuting Officer: Joshua P Campbell - S01158

Offense: Drugs / Trafficking in meth. or cocaine base - 28 g or more, but less than 100 g - 3rd or sub. (Fel., 25Y

Offense Code: 0349  
Code/Ordinance Sec: 44-53-0375(C)(2)(c)

This warrant is CERTIFIED FOR SERVICE in the  
 County/  Municipality of

The accused is to be arrested and brought before me to be dealt with according to the law.

(L.S.)

Signature of Judge

Date:

RETURN

A copy of this arrest warrant was delivered to defendant Izel Mario Paul on 10/28/24

Signature of Constable/Law Enforcement Officer 1139/531

RETURN WARRANT TO:  
Greenville General Sessions  
305 E. North Street  
Greenville County Courthouse  
Greenville, SC 29601-2120 EG

24003591

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STATE OF SOUTH CAROLINA  
 County/  Municipality of  
Greenville

AFFIDAVIT  
Personally appeared before me the affiant Joshua P Campbell being duly sworn deposes and says that defendant Izel Mario Paul did within this county and state on or about 9/25/2024 State of South Carolina (or ordinance of  County/  Municipality of Greenville) in the following particulars:

DESCRIPTION OF OFFENSE: Drugs / Trafficking in meth. or cocaine base - 28 g or more, but less than 100 g - 3rd or sub. (Fel., 25Y to 30Y)

I further state that there is probable cause to believe that the defendant named above did commit the crime set forth and that probable cause is based on the following facts:

The affiant, a Deputy of the Greenville County Sheriff's Office did find the defendant (Izel Paul) did knowingly and willfully possess around 38g of a clear crystal substance. This substance field tested positive for methamphetamine. After reviewing the defendant's criminal history I observed multiple prior convictions for narcotics. This offense occurred in the County of Greenville, South Carolina.

COMPUTER ENTERED

SEP 26 2024 Signature of Affiant

STATE OF SOUTH CAROLINA  
 COUNTY  
GREENVILLE COUNTY SHERIFF'S OFFICE  
Greenville

Affiant's Address 4 Mcgee Street Greenville, SC 29601-  
Affiant's Telephone

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FEB 24 2026

SC Court of Appeals

ARREST WARRANT

TO ANY LAW ENFORCEMENT OFFICER OF THIS STATE OR MUNICIPALITY OR ANY CONSTABLE OF THIS COUNTY:

It appearing from the above affidavit that there are reasonable grounds to believe that on or about 9/25/2024 defendant Izel Mario Paul did violate the criminal laws of the State of South Carolina (or ordinance of  County/  Municipality of Greenville) as set forth below:

DESCRIPTION OF OFFENSE: Drugs / Trafficking in meth. or cocaine base - 28 g or more, but less than 100 g - 3rd or sub. (Fel., 25Y to 30Y)

Having found probable cause and the above affiant having sworn before me, you are empowered and directed to arrest the said defendant and bring him or her before me forthwith to be dealt with according to law. A copy of this Arrest Warrant shall be delivered to the defendant at the time of its execution, or as soon thereafter as is practicable

Sworn to and subscribed before me on 9/25/2024

Signature of Issuing Judge (L.S.)  
James E. Hudson  
Judge Code: 5031

Judge's Address Law Enforcement Center Greenville, SC 29601-2256  
Judge's Telephone (864)467-5303

Issuing Court:  Magistrate  Municipal  Circuit

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ORIGINAL

Form Approved by S.C. Attorney General April 21, 2003 SCCA 518

ORIGINAL  
Entered On  
NCIC  
who  
State the criminal laws of the

BAIL set by

Judge EMOS  
on 10-28-24  
Type and Amount: no bond  
Name of Surety: \_\_\_\_\_

PRELIMINARY HEARING held by

Judge \_\_\_\_\_  
on \_\_\_\_\_  
Defendant Attorney: \_\_\_\_\_  
Decision: \_\_\_\_\_

DISPOSITION before

Judge \_\_\_\_\_  
on \_\_\_\_\_  
by \_\_\_\_\_  
(indicate jury trial, bench trial, plea, nol. pros., etc.)  
Disposition: \_\_\_\_\_  
Sentence: \_\_\_\_\_

JURORS

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

WITNESSES

Name: \_\_\_\_\_  
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CODEFENDANTS

\_\_\_\_\_  
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FILED  
OCT 31 2024  
CLERK of COURT  
GREENVILLE COUNTY