

THE STATE OF SOUTH CAROLINA
In the Appellate Court

RECEIVED

MAR 12 2026

APPEAL FROM GREENVILLE COUNTY
Court of General Sessions

SC Court of Appeals

Jessica Ann Salvini, Circuit Court Judge

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

The State,

Respondent.

v.

Izel Mario Paul,

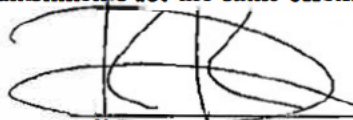
Appellant.

Rule 203 Explanation of Issue

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



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



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

CATHERINE S. HARRISON
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

February 25, 2026

Ms. Kaitlin A Diaz, Esquire
305 East North Street
Suite 123
Greenville SC 29601

Re: The State v. Izel M. Paul
Appellate Case No. 2026-000449

Dear Counsel:

This Court has received your explanation for appealing.

Please forward your explanation to your client, along with a statement that your client has twenty (20) days from the date of your transmittal letter to inform this Court in writing of any arguable basis that there are issues preserved for appeal. Please provide your client with the Court's address:

South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Please send your letter to your client within ten (10) days, with a copy to this Court, or this appeal will be dismissed.

Very truly yours,

Catherine Harrison, deputy
CLERK

cc: Alan McCrory Wilson, Esquire
Mark Reynolds Farthing, Esquire
Caroline Davis Kneece, Esquire
Wanda H. Carter, Esquire

13th Circuit Public Defender
Greenville County Courthouse
305 E. North Street, Suite 123
Greenville, SC 29601 KA

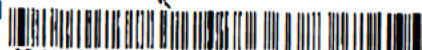
290

292

29211

N1-12

PRST FIRST-CLASS MAIL
U.S. POSTAGE PAID
GREENVILLE SC
PERMIT# 113



4040260302 - 153435948

2

RETURN SERVICE REQUESTED

RECEIVED

MAR 12 2026

SC Court of Appeals

Ms. Jenny
Clerk, The S.

29211

Post Office Box 11629

Columbia, South Carolina 29211