

**STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appellate Case No. 2026-001884

Mustafa El Shabazz Bey,
Appellant,

v.

South Carolina Department of Social Services,
Respondent.

**AFFIDAVIT OF APPELLANT
IN SUPPORT OF MOTION FOR LEAVE
TO PRESENT ADDITIONAL EVIDENCE
AND FOR REMAND**

1. My name is Mustafa El Shabazz Bey. I am the Appellant in this matter. I make this affidavit from my personal knowledge in support of my Motion for Leave to Present Additional Evidence and for Remand.
2. Before the November 2025 administrative proceeding, I had relocated from South Carolina to Maryland and had established substantial ties in Baltimore.
3. My state identification documents reflect that transition. My South Carolina identification card was issued on February 29, 2024 and reflected a Columbia, South Carolina address. A Maryland identification card was subsequently issued to me on August 3, 2024 and reflected a Maryland address. A true and correct copy of the photograph containing those identification documents is included in Exhibit G.
4. I also participated in Baltimore-area treatment and program services during 2024 and 2025. True and correct copies of the records in my possession concerning that participation are included in Exhibit G.
5. During 2025, I was employed in Baltimore. An earnings statement dated May 16, 2025 identifies a Baltimore mailing address and reflects Maryland state income-tax withholding. A subsequent letter from my Baltimore employer dated August 1, 2025 confirms that my employment ended on June 1, 2025. True and correct copies of those records are included in Exhibit G.
6. During Fall 2025, I was enrolled at Baltimore City Community College. The student records in my possession identify my residency as "Baltimore City Resident," identify Fall 2025 as my term of attendance, and reflect enrollment in the Business Management program.
7. My Baltimore City Community College records also reflect an in-person course at the Liberty Campus scheduled from September 22, 2025 through December 13, 2025. True and correct copies of the BCCC records in my possession are included in Exhibit G.
8. DSS conducted an Administrative Disqualification Hearing on November 3, 2025. I did not appear at that hearing.
9. I did not intentionally fail or refuse to participate in the hearing. I did not receive notice that gave me a meaningful opportunity to attend the November 3, 2025 hearing and defend myself.
10. Because I did not know of the hearing in time to participate, I did not have an opportunity to present my Maryland/Baltimore residency and address evidence, explain my circumstances, or present the complete records concerning the Texas deferred-adjudication proceeding and its subsequent discharge and dismissal.
11. Had I received notice in time to participate, I would have appeared and presented evidence concerning my residence and address history, the Texas disposition, and my understanding of that disposition.

12. On January 13, 2026, I contacted DSS by email. In that email, I informed DSS that I was residing in Baltimore, Maryland and provided my mailing address as 3013 Chelsea Terrace, Baltimore, Maryland 21216. I also stated that the determination had been made without my knowledge, that I had been unable to attend the hearing, and that I needed the Final Determination Order so that I could pursue an appeal. A true and correct copy of that communication is included as Exhibit F.

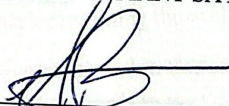
13. I later learned that DSS correspondence sent to a South Carolina General Delivery address was returned as undeliverable. The May 2026 correspondence concerning that failed mailing and the Administrative Law Court's confirmation of my Baltimore address is included as Exhibit E.

14. The documents contained in Exhibit G are true and correct copies of records and images in my possession concerning my state identification, Maryland/Baltimore residency and address history, treatment/program participation, employment, and Fall 2025 enrollment at Baltimore City Community College.

15. I did not intentionally withhold these documents from the administrative tribunal. I was not present at the November 3, 2025 hearing and therefore did not have the opportunity at that hearing to introduce them or explain their significance.

16. I submit these facts so that the Court may understand why the additional evidence was not presented at the administrative hearing and why I contend the evidence is material to notice, my nonappearance, prejudice, and the underlying administrative determination.

FURTHER AFFIANT SAYETH NOT.

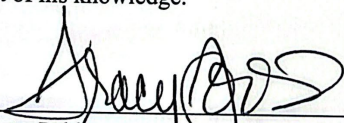


Mustafa El Shabazz Bey, Appellant, Pro Se
Date: 9/8/2026

NOTARY ACKNOWLEDGMENT

State of Maryland
County/City of Baltimore

Subscribed and sworn before me on this 8th day of September, 2026, by Mustafa El Shabazz Bey, who personally appeared before me and affirmed that the foregoing statements are true and correct to the best of his knowledge.



Notary Public
My Commission Expires: 1/22/2029



Do not sign the affidavit until you are in the presence of the notary if the notary requires an in-person oath or acknowledgment.