

LAW OFFICE OF



**TARA DAWN SHURLING, PA**

Attorney and Counselor at Law

3614 Landmark Drive

Suite A

Columbia, South Carolina 29204

E-Mail: [tdslaw@shurlinglaw.com](mailto:tdslaw@shurlinglaw.com)

(803) 738-8622

(Fax) (803) 738-1600

February 10, 2015

**RECEIVED**

FEB 12 2015

The Honorable Daniel E. Shearouse  
South Carolina Supreme Court Clerk  
Post Office Box 11330  
Columbia, South Carolina 29211-1330

**S.C. SUPREME COURT**

Re: Ezekiel Haynes, #309200 v. State of South Carolina; 2006-CP-38-0462.

Dear Mr. Shearouse:

A Notice of Appeal was filed in this matter on January 26, 2015. This client's family hired me for a circuit court PCR action only. I *was not* retained for any subsequent appeal. I have now obtained an affidavit of indigency from the client. I enclose a copy of the affidavit, and will forward the original to the Appellate Division of the South Carolina Commission on Indigent Defense. At this time, I ask to be relieved as counsel of record for this PCR appeal. Please let me know if there is anything further I need to do to formalize this request.

With my thanks for the Court's patience and assistance, I remain,

Sincerely yours,

A handwritten signature in black ink that reads "Tara Dawn Shurling". The signature is written in a cursive, flowing style.

Tara Dawn Shurling  
Attorney and Counselor at Law

TDS/sg

Enclosure

cc: Megan H. Jameson, Assistant Attorney General  
Lorienne French, Legal Service Coordinate, Appellate Defense  
Ezekiel Haynes, #309200  
Betty and Nathaniel Haynes

**RECEIVED**

STATE OF SOUTH CAROLINA )  
COUNTY OF Orangeburg )

AFFIDAVIT OF INDIGENCY FEB 12 2015

Case Name Ezekiel Haynes **S.C. SUPREME COURT**

Criminal Case No. 2006-CP-38-0462

Current Address: 900 wisacky Hwy, Bishopville, SC 29010

Are you incarcerated? XXX Yes (If "Yes") Where? LEE C.I  
\_\_\_\_\_ No

What were you convicted of? Murder

What was your sentence? (210) Forty years

In what county was this hearing held? Orangeburg

Presiding Judge's name? Judge Dickson

Date of hearing? May 17, 2005 guilty plea / February 20, 2014 <sup>post conviction</sup> relief hearing

Are you appealing from a trial, guilty plea or from a post-conviction relief hearing? ~~Appointed / Tara Dawn Shurling~~ <sup>Post Conviction Relief</sup> Dismissal order

Were you represented by a court-appointed attorney, public defender, , or retained counsel?

Appointed / Tara Dawn Shurling

Name of attorney/public defender? Tara Dawn Shurling

If retained, how much did you pay for attorney fees? \$ 20,000

If you still owe money to your attorney, how much? \$ ~~15,000~~ 15,000

.....  
1. Are you presently employed? Yes \_\_\_\_\_ No XXX

a. If "yes," state the amount of your salary or wages per month, and give the name and address of your employer. \_\_\_\_\_

b. If "no," state the name and address of last employment, date of termination of employment, and amount of your salary or wages per month. N/A

2. List by name, age and relationship to you, any persons who are dependent upon you for support. Indicate beside each how much you contribute toward their support. N/A

3. Have you received within the past twelve months any money from any of the following sources?

a. Business, profession or form of self-employment?

Yes \_\_\_\_\_ No XXX

b. Rent payments, interest or dividends?

Yes \_\_\_\_\_ No XXX

c. Pensions, annuities or life insurance payments?

Yes \_\_\_\_\_ No XXX

d. Gifts or inheritance?

Yes \_\_\_\_\_ No XXX

e. Any other sources?

Yes \_\_\_\_\_ No XXX

If the answer to any of the above is "yes," describe each source of money and state the amount received from each during the past twelve months. N/A

4. Do you own cash, or do you have any money in a checking or savings account?

Yes \_\_\_\_\_ No N/A

If the answer is "yes," state the total amount of the cash owned. \$ N/A

5. Do you own any real estate, stocks, bonds, notes or other valuable property (excluding ordinary household furnishings and clothing)? Yes \_\_\_\_\_ No N/A

If the answer is "yes," describe the property and state the appropriate value of the items owned. N/A

6. What kind of motor vehicle do you own? N/A

Is it paid for? Yes \_\_\_\_\_ No \_\_\_\_\_

If not, what are the monthly payments? \$ \_\_\_\_\_

7. How much do you owe (on liens, mortgages, other encumbrances or debts)? N/A

I do solemnly swear that the account by me delivered into this Court does contain a true and full account of all my real and personal estate, debts, credits and effects whatsoever without exception, which I, or any person in trust for me, have or at the time of my possession had, or am, or was, in respect, entitled to, in possession, remainder or reversion and that I have not at any time since charges were made against me or before, directly or time since charges were made against me or before, directly or indirectly sold, leased, assigned or otherwise disposed of or made over, in trust for myself or otherwise, other than is mentioned herein.

I understand that the State shall file a claim against me in an amount equal to the cost for representation, but that such claim shall not constitute a lien against my property, unless, the claim is reduced to judgment by the Order of the Court after giving me at least thirty days' notice.

Under penalty of perjury, I certify that the information give by me on this affidavit is true and correct, and I understand that I will be subject to civil and/or criminal penalties if I knowingly furnish false information.

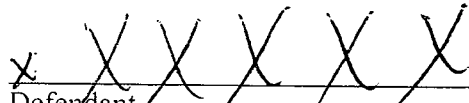
I am financially unable to employ counsel.

This 4 day of February, 2015.

  
Defendant

I understand that I am entitled to at least thirty days' notice before a claim against me may be reduced to judgment, and I do hereby waive the right to such notice.

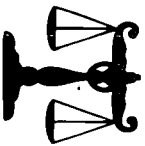
This \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

  
Defendant

SUBSCRIBED AND SWORN to before  
me this FEB day of 4, 2015

  
NOTARY PUBLIC FOR SOUTH CAROLINA

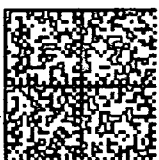
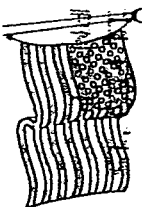
My commission Expires: April 19 2018




Law Office of  
**Tara Dawn Shurling, P.A.**  
 Attorney and Counselor at Law  
 3614 Landmark Dr., Suite A  
 Columbia, South Carolina 29204

COLUMBIA

SC 290



UNITED STATES POSTAGE  
  
 02 1P  
 0000615243 FEB 10 2015  
 MAILED FROM ZIP CODE 29204  
**\$000.48<sup>00</sup>**  
 PITNEY BOWES

The Honorable Daniel E. Shearouse  
 South Carolina Supreme Court Clerk  
 Post Office Box 11330  
 Columbia, South Carolina 29211-1330

RE: Ezekiel Haynes

29211133030

