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SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

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Robert M. Dudek, Chief Appellate Defender
Wanda H. Carter, Deputy Chief Appellate Defender

July 7, 2015

RECEIVED

JUL 07 2015

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

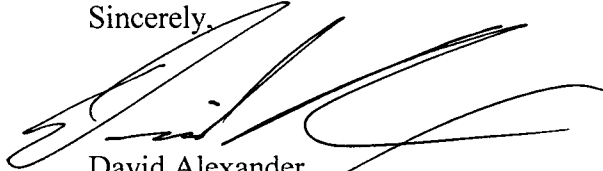
S.C. Supreme Court

Re: State of South Carolina v. Anthony Jackson

Dear Mr. Shearouse:

Enclosed is a copy of petition for writ of certiorari, a motion for leave to proceed *in forma pauperis*, and an affidavit of Anthony Jackson in support of motion to proceed *in forma pauperis*, which I have filed today in the United States Supreme Court. Please contact me if you have any questions.

Sincerely,



David Alexander
Appellate Defender

DAA/blw

Enclosure

cc: Jennifer Ellis Roberts, Esquire
The Honorable Jenny Abbott Kitchings, Clerk

No. _____

In the Supreme Court of the United States

ANTHONY JACKSON, Petitioner,
v.
STATE OF SOUTH CAROLINA, Respondent.

**ON PETITION FOR WRIT OF CERTIORARI TO THE
SOUTH CAROLINA COURT OF APPEALS**

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

Anthony Jackson asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

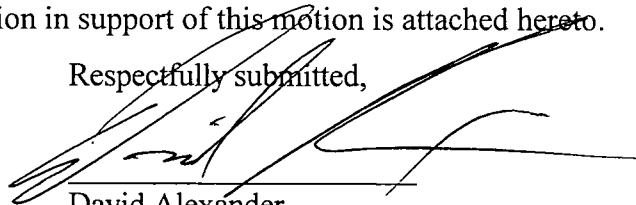
Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s):

South Carolina Court of Appeals; South Carolina Supreme Court

Petitioner has **not** previously been granted leave to proceed *in forma pauperis* in any other court.

Petitioner's affidavit or declaration in support of this motion is attached hereto.

Respectfully submitted,



David Alexander
Counsel of Record
South Carolina Commission on Indigent Defense
Division of Appellate Defense
1330 Lady Street, Fourth Floor
Columbia, SC 29201
(803) 734-1330

July 7, 2015

IN THE
SUPREME COURT OF THE UNITED STATES

October Term, 2014

No. - _____

ANTHONY JACKSON

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

AFFIDAVIT OF ANTHONY JACKSON
IN SUPPORT OF MOTION TO
PROCEED IN FORMA PAUPERIS

I, Anthony Jackson, being duly sworn, state that I am the petitioner in this case; that because of my poverty I am unable to pay the costs of or give security for this proceeding; that I believe I am entitled to redress.

The responses to the questions and instructions below relating to my ability to pay costs or give security are true.

1. Are you presently employed? *no*
 - a. If the answer is yes, state the amount of your salary or wages per *no* month and give the name and address of your employer.

- b. If the answer is no, state the date of your last employment and the amount of the salary and wages per month which you received.

_____ *NO* _____

2. Have you received within the past twelve months any income from a business, progression or other form of self-employment, or in the form of rent payments, interest, dividends, or other sources?

_____ *NO* _____

- a. If the answer is yes, describe each source of income, and state the amount received from each during the past twelve months.

3. Do you own any cash or checking or savings account? *NO*

- a. If the answer is yes, state the total value of the items owned. *NO*

4. Do you own any real estate, stocks, bonds, notes, automobiles, or other valuable *NO* property (excluding ordinary household furnishings and clothing)?

- a. If the answer is yes, describe the property and state its approximate value. *NO*

5. List the persons who are dependent upon you for support and state your relationship to those persons.

NA

I understand that a false statement or answer to any questions in this affidavit will subject me to penalties for perjury.

Anthony Jackson
ANTHONY JACKSON

SWORN to and subscribed before me
this 20th day of April, 2015.

Lillian S. Glover (L.S.)

Notary Public for South Carolina

My Commission Expires: 03-04-2025

No. _____

In the Supreme Court of the United States

ANTHONY JACKSON, Petitioner,

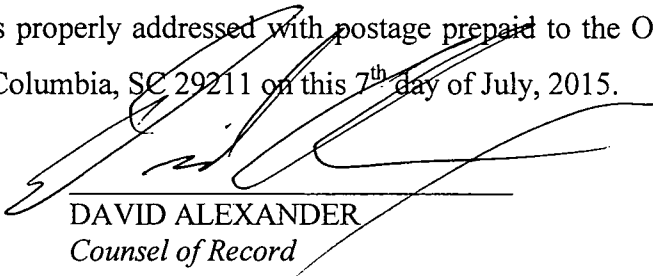
v.

STATE OF SOUTH CAROLINA, Respondent.

**ON PETITION FOR WRIT OF CERTIORARI TO THE
SOUTH CAROLINA COURT OF APPEALS**

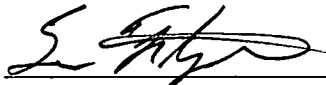
CERTIFICATE OF SERVICE

I certify that copies of the motion for leave to proceed in forma pauperis together with the affidavit of Anthony Jackson have been served upon opposing counsel, Jennifer Ellis Roberts, Esquire, by mailing copies in envelopes properly addressed with postage prepaid to the Office of the Attorney General, P.O. Box 11549, Columbia, SC 29211 on this 7th day of July, 2015.



DAVID ALEXANDER
Counsel of Record

SWORN TO BEFORE me this 7th day of July, 2015.



(L.S.)
Notary Public for South Carolina
My Commission Expires: October 30, 2022.

