

No. \_\_\_\_\_

**In the Supreme Court of the United States**

**RECEIVED**

ANTHONY JACKSON, Petitioner,

v.

STATE OF SOUTH CAROLINA, Respondent.

JUL 07 2015

SC Court of Appeals

**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*.

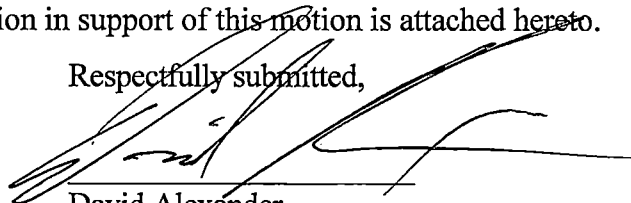
Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s):

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. - \_\_\_\_\_

RECEIVED

JUL 07 2015

SC Court of Appeals

ANTHONY JACKSON

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT

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

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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 20<sup>th</sup> day of April, 2015.

Lillian S. Glover (L.S.)

Notary Public for South Carolina

My Commission Expires: 03-04-2025

No. \_\_\_\_\_

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**In the Supreme Court of the United States**

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ANTHONY JACKSON, Petitioner,

v.

STATE OF SOUTH CAROLINA, Respondent.

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

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**CERTIFICATE OF SERVICE**

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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 7<sup>th</sup> day of July, 2015.

  
\_\_\_\_\_  
DAVID ALEXANDER  
*Counsel of Record*

SWORN TO BEFORE me this 7<sup>th</sup> day of July, 2015.

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





# SCCID

SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

Division of Appellate Defense  
1330 Lady Street, Suite 401  
Columbia, South Carolina 29201-3332  
Post Office Box 11589  
Columbia, South Carolina 29211-1589  
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Robert M. Dudek, Chief Appellate Defender  
Wanda H. Carter, Deputy Chief Appellate Defender

July 7, 2015

RECEIVED  
JUL 07 2015  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk, S.C. Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: State of South Carolina v. Anthony Jackson

Dear Ms. Kitchings:

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 Daniel E. Shearhouse