

SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001

July 10, 2015

David Alexander
South Carolina Comm. on Indegent Defense
1330 Lady Street
4th Floor
Columbia, SC 29201

RE: Anthony-Jackson v. South Carolina
SCSC 2015-000038

Dear Mr. Alexander:

The above-entitled petition for writ of certiorari was postmarked July 7, 2015 and received July 10, 2015. The papers are returned for the following reason(s):

The notarized affidavit or declaration of indigency does not comply with Rule 39. You may use the enclosed form.

Please correct and resubmit as soon as possible. Unless the petition is submitted to this Office in corrected form within 60 days of the date of this letter, the petition will not be filed. Rule 14.5.

A copy of the corrected petition must be served on opposing counsel.

When making the required corrections to a petition, no change to the substance of the petition may be made.

Sincerely,
Scott S. Harris, Clerk

By:



Andrew Downs
(202) 479-3038

Enclosures

RECEIVED
JUL 13 2015

RECEIVED

AUG - 5 2015

SC Supreme Court



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
Telephone: (803) 734-1330
Facsimile: (803) 734-1397

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

August 5, 2015

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

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AUG - 5 2015

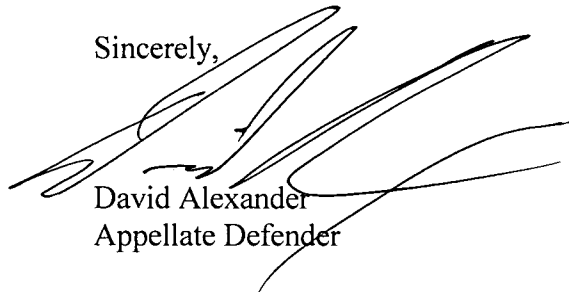
S.C. Supreme Court

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*, which I have filed today in the United States Supreme Court. Please do not hesitate to 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



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The Honorable Scott S. Harris
Clerk
Supreme Court of the United States
Washington, DC 20543

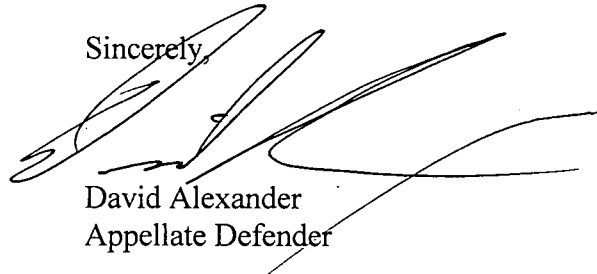
S.C. Supreme Court

Re: State of South Carolina v. Anthony Jackson

Dear Mr. Harris:

Enclosed is Petitioner's Certificate of Filing by Mail in the above-referenced case.

Sincerely,



David Alexander
Appellate Defender

DAA/blw

Enclosure

cc: Jennifer Ellis Roberts, Esquire
The Honorable Daniel E. Shearouse
The Honorable Jenny Abbott Kitchings

No. _____

In the Supreme Court of the United States

ANTHONY JACKSON, Petitioner,

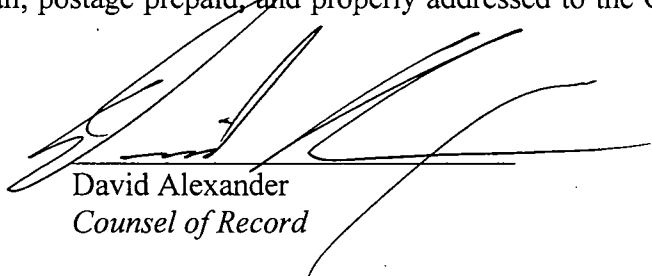
v.

STATE OF SOUTH CAROLINA, Respondent.

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


CERTIFICATE OF FILING BY MAIL

I hereby certify that I am a member of the Bar of this Court and that on August 5, 2015, I filed the petition for writ of certiorari and appendix in the above-referenced case, together with a motion for leave to proceed in forma pauperis, by causing the originals and ten copies of the same to be deposited in the United States Mail, postage prepaid, and properly addressed to the Clerk of this Court.



David Alexander
Counsel of Record

SUBSCRIBED AND SWORN TO before me
this 5th day of August, 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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Wanda H. Carter, Deputy Chief Appellate Defender

August 5, 2015

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S.C. Supreme Court

The Honorable Scott S. Harris
Clerk, Supreme Court of the United States
1 First Street, N.E.
Washington, DC 20543

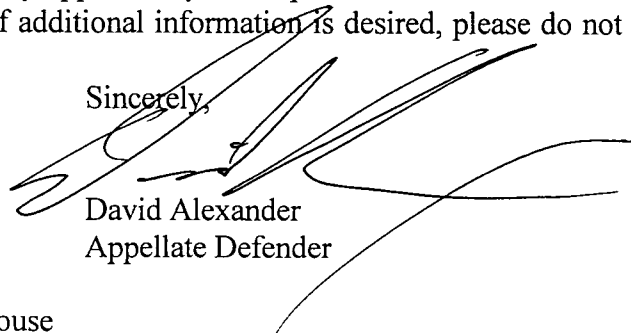
Re: Anthony Jackson v. State of South Carolina

Dear Mr. Harris:

Enclosed are the petition for writ of certiorari and a motion for leave to proceed *in forma pauperis*. The certificate of service is attached to the original petition. Representing the State of South Carolina is Jennifer Ellis Roberts, Esquire, of the Office of the Attorney General, Post Office Box 11549, Columbia, South Carolina 29211-1549. Her phone number is (803) 734-3970. I represent Petitioner Anthony Jackson. The other information required by Rule 29.5 is contained above.

This petition is being refiled pursuant to Rule 14.5 because of a problem with the original motion to proceed *in forma pauperis*. Attached is a letter from Andrew Downs of your office informing me of the deficiency. I greatly appreciate your help and that of Mr. Downs in assisting me in filing this petition correctly. If additional information is desired, please do not hesitate to contact me.

Sincerely,



David Alexander
Appellate Defender

cc: The Honorable Daniel E. Shearouse
The Honorable Jenny Abbott Kitchings
Jennifer Ellis Roberts, Esquire
Client

SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001

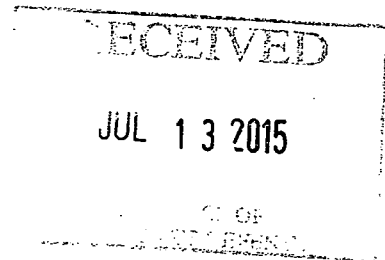
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AUG - 5 2015

S.C. Supreme Court

July 10, 2015

David Alexander
South Carolina Comm. on Indigent Defense
1330 Lady Street
4th Floor
Columbia, SC 29201



RE: Anthony Jackson v. South Carolina
SCSC 2015-000038

Dear Mr. Alexander:

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Sincerely,
Scott S. Harris, Clerk

By:

A handwritten signature in black ink, appearing to read "Andrew Downs".

Andrew Downs
(202) 479-3038

Enclosures

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 was determined to be indigent and appointed a public defender in the Horry County Court of General Sessions. The orders of the Horry County Court of Common Pleas appointing counsel for Petitioner as an indigent party are appended hereto.

Counsel, an Appellate Defender employed by the South Carolina Commission on Indigent Defense, represented Anthony Jackson on appeal as an indigent party pursuant to S.C. Code Ann. § 17-3-360, which provides that the Division of

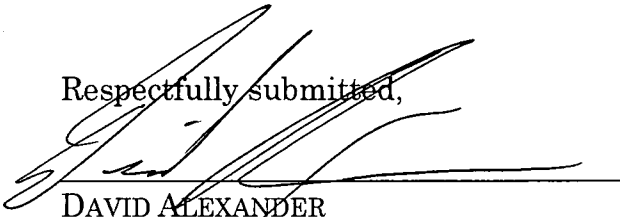
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AUG - 5 2015

S.C. Supreme Court

Appellate Defense shall represent indigent persons convicted of crimes before the appellate courts of South Carolina.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David Alexander', is written over a horizontal line.

DAVID ALEXANDER

Counsel of Record

Appellate Defender

SOUTH CAROLINA COMMISSION

ON INDIGENT DEFENSE

DIVISION OF APPELLATE DEFENSE

Post Office Box 11589

Columbia, South Carolina 29211-1589

(803) 734-1330

dalexander@sccid.sc.gov

August 5, 2015

STATE OF SOUTH CAROLINA)
COUNTY OF HORRY)
STATE OF SOUTH CAROLINA)
V.)
ANTHONY JACKSON)
DEFENDANT)

IN THE COURT OF GENERAL SESSIONS
OF THE FIFTEENTH JUDICIAL CIRCUIT

NOTICE OF SUBSTITUTION
OF COUNSEL
PUBLIC DEFENDER TO PUBLIC DEFENDER

NEW ATTORNEY: ERIC FOX

File No. 26A11-00003275
S.S. No. 042-66-6430

To: Court of General Sessions of the Fifteenth Judicial Circuit
Office of the Solicitor
Appointed Counsel
Defendant

Please be advised that RONALD HAZZARD, Public Defender for the above named defendant in the above-captioned matter has been replaced by Eric Fox, Public Defender:

ERIC FOX
203 Laurel Street
P.O. Box 1666
Conway, SC 29526
Phone: 843-915-5385
Fax: 843-915-6385

On the offense(s) listed below:

M-350295 Burglary / Burglary 1st - First degree

M-350296 FTC / Financial Transaction Card fraud value \$500 or less in six month period, by cardholder


M-350297 FTC / Financial Transaction Card fraud value \$500 or less in six month period, by cardholder

2017 MAY -7 AM 9:34
711-500

Respectfully Submitted,

Conway, South Carolina

April 30, 2012


ORRIE E. WEST
CHIEF PUBLIC DEFENDER
203 Laurel St.
P.O. Box 1666
Conway, South Carolina 29526

FILED
2012 MAY -7 AM 9:34

STATE OF SOUTH CAROLINA)
COUNTY OF HORRY)

IN THE COURT OF GENERAL SESSIONS
OF THE FIFTEENTH JUDICIAL CIRCUIT

STATE OF SOUTH CAROLINA)

CERTIFICATE OF REPRESENTATION
(APPOINTING AS COUNSEL)

-VS-

ANTHONY JACKSON

RONALD W. HAZZARD

DEFENDANT)

MELANIE HUGGINS-WARD
CLERK OF COURT

2011 DEC -6 AM 9:56

FILED
HORRY COUNTY

FILE NO: 26A11-00003275

SSN: 042-66-6430

TO: Court of General Sessions of the Fifteenth Judicial Circuit
Office of the Solicitor
Appointed Counsel
Defendant

This certifies that the above captioned Defendant is eligible for the services of the Public Defender, such determination having been made on, 29th day of November, 2011, regarding the charge(s) of:

M-350295 Burglary / Burglary 1st - First degree

M-350296 FTC / Financial Transaction Card fraud value \$500 or less in six month period, by cardholder

M-350297 FTC / Financial Transaction Card fraud value \$500 or less in six month period, by cardholder

The Defendant's Counsel is **Ronald W. Hazzard**. The office of the Public Defender requests on the Defendant's behalf any and all evidence in the possession of you and or your agents pursuant to S.C. Criminal Practice Rule 5, and Brady v. Maryland 373 U.S. 383 (1963). The formal Motion for Discovery is attached.



ORRIE E. WEST

CONWAY, SC
DATED: November 29, 2011

FIFTEENTH CIRCUIT
PUBLIC DEFENDER

FILED
HORRY COUNTY

2011 DEC -6 AM 9:56

MELANIE JUGGINS-WARD
CLERK OF COURT

No. _____

In the Supreme Court of the United States

ANTHONY JACKSON, Petitioner,

v.

STATE OF SOUTH CAROLINA, Respondent.

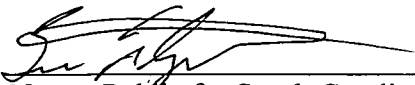
**ON PETITION FOR WRIT OF CERTIORARI TO THE
SOUTH CAROLINA COURT OF APPEALS**

CERTIFICATE OF SERVICE

I certify that copies of the petition for writ of certiorari and appendix in this case together with a motion for leave to proceed in forma pauperis have been served upon opposing counsel for Respondent, the State of South Carolina, 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 5th day of August, 2015.


DAVID ALEXANDER
Counsel of Record

SWORN TO BEFORE me this 5th day of August, 2015.



Notary Public for South Carolina
My Commission Expires: October 30, 2022.

