

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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APPEAL FROM LAURENS COUNTY
COURT OF COMMON PLEAS

NOV 20 2015

S.C. Supreme Court

FRANK R. ASBY, CIRCUIT COURT JUDGE

MARCUS S. YOUNG..... PETITIONER

v.

STATE OF SOUTH CAROLINA..... RESPONDENT

APPELLATE CASE NO. 2014-002631

PETITION FOR APPELLATE BOND

MARCUS S. YOUNG
PRO SE PETITIONER

ALAN WILSON
ATTORNEY GENERAL

TYGER RIVER C1
200 PRISON ROAD
ENOREE, SC 29335

J. RUTLEDGE JOHNSON
ASSISTANT ATTORNEY GENERAL
P.O. Box 11549
COLUMBIA, SC 29211

PETITIONER PLED GUILTY TO ONE COUNT OF ASSAULT AND BATTERY WITH THE INTENT TO KILL AND THREE COUNTS OF ASSAULT AND BATTERY OF A HIGH AND AGGRAVATED NATURE BEFORE JUDGE DURHAM COLE ON OCTOBER 20, 2010. SUBSEQUENTLY, PETITIONER WAS SENTENCED TO FIFTEEN YEARS.

DURING PETITIONER'S INCARCERATION HE HAS:

1) WORKED AUTOMOTIVE MECHANICS, PRISON INDUSTRIES, AND AS A LAW CLERK, 2) BEEN A MEMBER AND CHAIRMAN OF THE INMATE REPRESENTATIVE COMMITTEE, 3) SUCCESSFULLY COMPLETED THE WORK KEYS PROGRAM, 4) PARTICIPATED IN OPERATION BEHIND BARS, AND 5) BEEN GRANTED A LEVEL 1 CUSTODY LEVEL FOR MEETING SPECIFIED CRITERIA, INCLUDING GOOD BEHAVIOR, WHICH ENABLES HIM TO WORK IN SOCIETY.

PETITIONER HAS BEEN A RESIDENT OF SOUTH CAROLINA FOR THIRTY YEARS WITH NO TIES TO ANY OTHER STATE. HE WILL RESIDE WITH HIS GRANDMOTHER, SUSIE BROOKS, AT 2815 COVENANT ROAD IN COLUMBIA, SC.

PETITIONER HAS JOB OPPORTUNITIES WITH THE FOLLOWING:

THE CITY OF COLUMBIA

REFERENCE: DOUGLAS BROOKS 3611 BELVEDERE DR COLUMBIA, SC

BENEDICT COLLEGE

REFERENCE: MICHAEL BROOKS 2701 SCHOOLHOUSE RD. COLUMBIA, SC

§ PETITIONER WILL BE ABLE TO PROMPTLY WORK.

§ PETITIONER LISTS THE FOLLOWING STIPULATIONS, ALONG WITH ANY OTHER THE COURT MAY IMPOSE, TO BE MET IN ORDER TO SHOW A STANDING OF GOOD FAITH IN BEING AN UPSTANDING, PRODUCTIVE CITIZEN.: 1) A GPS MONITER, 2) A 10:00 PM CURFEW UNLESS WORK-RELATED, 3) REPORT TO ANY DESIGNATED PERSONNEL ON A WEEKLY, BI-WEEKLY OR MONTHLY SCHEDULE, 4) RANDOM DRUG TESTING

§ PETITIONER'S ISSUES ON APPEAL ARE NOT MERITLESS AND HIS APPEAL AND PETITION FOR APPELLATE BOND ARE NOT FRIVOLOUS FILINGS UPON THE COURT. AS SUCH, PETITIONER'S ISSUES WARRANT A VACATED SENTENCES AND SHOULD, WITH EVERYTHING ELSE, BE CONSIDERED WHILE MAKING A FAIR DECISION ON THIS PETITION.