

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas
Honorable Thomas A. Russo, Circuit Court Judge

Case No: 2015-001138

RECEIVED

NOV 28 2016

SC Court of Appeals

Melvin Roberts.....Appellant

v.

Mark Keel, Chief of the South Carolina Law Enforcement Division and the State of South
CarolinaRespondent

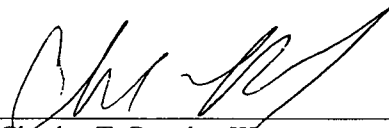
PETITION FOR REHEARING

Appellant, Roberts, petitions the Court of Appeals to rehear/reconsider its ruling issued on November 9, 2016 in this matter based on, but not limited to, the following reasons;

A. The trial Court as well as the Court of Appeals have overlooked issues of material fact regarding remedies available for individuals for removal from the South Carolina Sexual Offender Registry, and;

B. The trial Court as well as the Court of Appeals have overlooked the fact that the Sex Offender Registry laws do not provide an adequate remedy and therefore equitable remedy should be made available, as appropriate.

For the reasons aforementioned the Court of Appeals should reconsider its decision.



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Sumter, SC
November 23, 2016

The Brooks Law Office, LLC

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SC Court of Appeals

South Carolina Court of Appeals
Clerk
Post Office Box 11629
Columbia, South Carolina 29211

RE: Roberts vs. Mark Keel, Chief of the South Carolina Law Enforcement Division, et
al
2015-001138

Dear Sir or Madam:

Enclosed herewith please find the original and six (6) copies of the Petition for Rehearing and Proof of Service in the above titled matter. I have also provided the necessary fee for this Petition.

Thank you for your attention to this matter. If there are any questions, please feel free to give me a call.

With kind regards,

Sincerely,



Charles T. Brooks, III
CTB,III/jlm
Enclosures as stated

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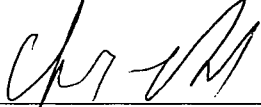
PROOF OF SERVICE

I, the undersigned, do hereby certify that on this November 23, 2016, I served the foregoing **PETITION FOR REHEARING** as well as **Proof of Service** in this matter by depositing a true copy of it in the United States Mail, postage prepaid, on November 23, 2016, addressed to the following as indicated below:

Office of SC Attorney General
ATTN: T. Parkin C. Hunter
Post Office Box 11549
Columbia, South Carolina 29211

SLED
Adam L. Whitsett, Esq.
Post Office Box 21398
Columbia, South Carolina 29221-1398

Dated: November 23, 2016



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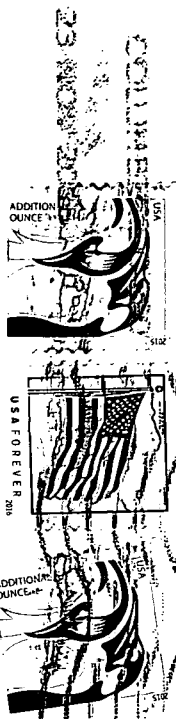
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