

STATE OF SOUTH CAROLINA  
COUNTY OF BARNWELL

vs.  
Todd Virgil Brown,  
  
Appellant

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

INDICTMENT #: 2015-GS-02-00716

**RECEIVED**

DEC 12 2016

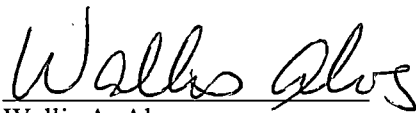
**SC Court of Appeals**

**RULE 203(B) EXPLANATION**

Immediately following the plea in January 2016, the Defendant requested that a motion to reconsider the sentence and an appeal be filed on his behalf. The motion to reconsider was denied by the Court.

Despite not having a good faith basis to believe there are any appeal issues for this case, the undersigned attorney is filing this appeal at the request of her client. See Frazier v. South Carolina, 430 F.3d 696, 706 (4<sup>th</sup> Cir.2005) (“A defendant has a right to pursue a direct appeal, even if frivolous, which counsel must assist as ‘an active advocate on behalf of his client.’”) (quoting Anders v. California, 386 U.S. 738, 744 (1967)).

Respectfully submitted,



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December 7, 2016