

13TH JUDICIAL CIRCUIT PUBLIC DEFENDER

CHRISTOPHER D. SCALZO, CIRCUIT PUBLIC DEFENDER

**Greenville County
Public Defender Office**
Greenville County Courthouse
305 East North Street, Suite 123
Greenville, SC 29601
Tel. (864) 467-8522
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**Pickens County
Public Defender Office**
Pickens County Courthouse
214 East Main Street, B-240
Pickens, South Carolina 29671
Tel. (864) 898-5577
Fax (864) 898-5579

May 7, 2019

Via Regular Mail

James Christopher Townsend; 00227964, A2-0003-B
Kirkland Correctional Institution
4344 Broad River Rd
Columbia, SC 29210

**Re: State v. James C. Townsend
Appellate Case No. 2019-000716**

RECEIVED

MAY 09 2019
SC Court of Appeals

Dear Mr. Townsend:

Enclosed please find a copy of my explanation regarding the basis for your appeal; I believe I also included that letter for you when I sent you the original notice.

You now have 20 days from May 7, 2019 to inform the Court in writing of any arguable basis that there are issues preserved for appeal. You must send your written basis for appeal to:

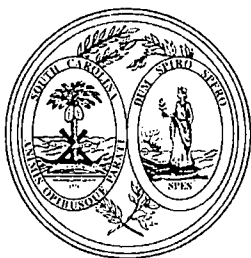
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Respectfully,

Daniel M. H. King, Esq. Bar Number: 102292
Assistant Public Defender, Thirteenth Judicial Circuit
214 E. Main St, Suite B-240
Pickens, SC 29671
Plea Attorney for Appellant

Enclosure

cc: Clerk of Court, South Carolina Court of Appeals



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April 25, 2019

Via Regular Mail

The Honorable Jenny A. Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

COPIES

Re: State v. James Christopher Townsend

Case No(s): 2018-GS-39-512, 2018-GS-39-513; 2014-GS-39-2054, 2016-GS-39-160, 2016-GS-39-162

Dear Ms Kitchings:

Enclosed for filing are the following:

1. Two originals of Notice of Appeal in the above Case, along with original Proof of Service attached to each Notice;
2. A copy of the indictments for the plea;
3. A copy of the redacted sentencing sheets; and,
4. A copy of the Form 9s from the violation of probation.

Please return to me a clocked copy of the Notice of Appeal in the self-addressed stamped envelope enclosed for that purpose.

The Notice has been filed with the Pickens County Clerk of Court. Further, please accept this letter and the following as my compliance with Rule 203(d)(1)(B)(iv)'s requirement for a written explanation showing issues to be reviewed on appeal of a guilty plea:

On April 24, 2019, Mr. Townsend requested that I file an appeal to his guilty plea of April 16, 2019 by way of a FAX from the Oconee County Detention Center. Specifically he requests that I file an appeal of his guilty plea and the sentence imposed by the court on April 16, 2019.

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SC Court of Appeals

There was no recommendation by the State at his plea because his offer had expired some months prior; and the plea resulted in a probation violation. The presiding judge accepted the plea of guilty on his pending charges then sentenced him to five years in the Department of Corrections for his probation violation. After the probation sentence, the presiding judge then sentenced Mr. Townsend to five years in the Department of Corrections on his Receiving Stolen Goods Enhanced charge, and a three-year concurrent sentence on one count of Failure to Stop for a Blue Light. However, the presiding judge ran these two new sentences consecutive to the probation violation sentence.

As an officer of the Court, I do not believe there are any meritorious issues to be reviewed on appeal. Nevertheless, Mr. Townsend has a legal right to appeal his conviction and I am doing so at his instruction.

If anything further is required, please do not hesitate to contact me.

These matters are being referred to the Office of Appellate Defense in that I was participating as Court appointed counsel at the time of the plea.

Thank you for your attention to this matter.

Respectfully,

Daniel M. H. King, Esq.
Assistant Public Defender
Thirteenth Judicial Circuit
214 E. Main St, Suite B-240
Pickens, SC 29671
Plea Attorney for Appellant

Enclosure

cc: Office of Appellate Defense
James Townsend, Oconee Detention Center



Daniel M. King

13th Circuit Public Defender

Pickens County Courthouse
214 E. Main Street, Suite B-240
Pickens, SC 29671

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