

**Public Defender
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1675-1E York Highway
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York, S.C. 29745**



**Harry A. Dest
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**Union County Public Defender
Erik D. Delaney
Jenny Williams**

July 16, 2019

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JUL 30 2019

SC Court of Appeals

Jeremy Andrew Scruggs
3 Parker St.
Rock Hill, S.C. 29730

Dear Mr. Scruggs:

Enclosed please find certified copies of the Notice of Appeal, Rule 203(B) Explanation and Certified Certificate of Service regarding your recent plea. Please note that you must inform the South Carolina Court of Appeals in writing, within twenty (20) days of the date of this letter, of any arguable basis that there are issues preserved for appeal.

You must send your arguments for your appeal to the following address:

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

Sincerely,

**Michael Morin
Assistant Public Defender
Sixteenth Judicial Circuit**

MM/jbb

Enclosures

Cc: South Carolina Court of Appeals

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THE STATE OF SOUTH CAROLINA
In the South Carolina Court of Appeals

2019 JUL 16 PM 3:18

OF
DAVID HAMILTON
C.C.C.P. & GS
YORK COUNTY, SC

APPEAL FROM YORK COUNTY
Court of General Sessions

Daniel D. Hall, Circuit Court Judge

Case No.: 2019-GS-46-01064

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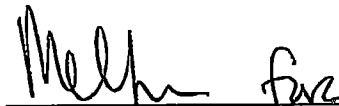
JUL 30 2019

SC Court of Appeals

The State of South Carolina, Respondent
vs
Jeremy Andrew Scruggs, Appellant

NOTICE OF APPEAL

Jeremy Andrew Scruggs appeals his guilty plea and the sentence imposed by the Honorable Daniel D. Hall. On July 8, 2019 the Appellant pled guilty to Hit and Run, Attended Vehicle, Duties of Driver Involved in Accident, Property Damage on Indictment No: 2019-GS-46-01064. The Appellant received a sentence of twelve (12) months suspended on thirteen (13) months probation on indictment 2019-GS-46-01064. And the Appellant received nine (9) days credit for time served.



Michael Morin
Assistant Public Defender

This 16 day of July, 2019
York, South Carolina

Other Counsels of Record:
Leslie D. Robinson
Assistant 16th Circuit Solicitor
1675-1A York Hwy
York, SC 29745
(803) 628-3020

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DAVID HAMILTON
C.C.P. & GS
YORK COUNTY, SC

THE STATE OF SOUTH CAROLINA
In the South Carolina Court of Appeals

APPEAL FROM YORK COUNTY
Court of General Sessions

Daniel D. Hall, Circuit Court Judge

Case No.: 2019-GS-46-01064

The State of South Carolina, Respondent
v.
Jeremy Andrew Scruggs, Appellant

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JUL 30 2019

SC Court of Appeals

Certificate of Service

This is to certify that a copy of the Notice of Appeal in the case of The State vs. Jeremy Andrew Scruggs was served upon counsel for the State, Leslie Dawn Robinson, Assistant 16th Circuit Solicitor on July 16, 2019 by hand-delivering a copy to her office located at the 1675-1A York Hwy, York, South Carolina, 29745 by the undersigned.



Julie Bankhead
Legal Secretary for Michael Morin
Assistant Public Defender

STATE OF SOUTH CAROLINA)

Indictment No.: 2019-GS-46-01064

IN THE COURT OF APPEALS)

State of South Carolina)

-vs-)

Jeremy Andrew Scruggs,)

Defendant.)

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JUL 30 2019

SC Court of Appeals

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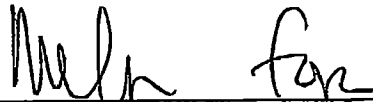
DAVID HAMILTON
C.C.P. & GS
YORK COUNTY, SC

RULE 203(B) EXPLANATION

Pursuant to Rule 203(B)(iv), the issue to be raised on appeal is whether the trial court abused its discretion when it imposed the twelve months suspended on thirteen months on probation sentence with nine days credit for time served upon the Appellant after he pled guilty to Hit and Run, Attended Vehicle, Duties of Driver Involved in Accident, Property Damage on Indictment No. 2019-GS-46-01064..

The undersigned does not have a good faith basis to believe that this issue is properly before the Court of Appeals, and the undersigned did not object to the sentence or file a motion to reconsider the sentence. Nevertheless, the undersigned consulted with the Appellant about his right to appeal, and after consultation, the undersigned has filed the instant appeal at the request of the Appellant because the Sixth Amendment requires counsel to follow the Appellant's request. See *Frazer v. South Carolina*, 430 F.3d 696, 705 (4th 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,



Michael Morin
P.O. Box 691
York, South Carolina 29745
(803) 628-3031
Attorney for Scott Carlton Bowers

York, South Carolina

July 18, 2019

YORK COUNTY PUBLIC DEFENDER OFFICE

MOSS JUSTICE CENTER
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York, SC 29745-0691
Telephone (803) 628-3031

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FAX COVER SHEET
FAX (803) 628-3054

JUL 30 2019

SC Court of Appeals

To: V. Claire Allen

From: Michael Morin

Re: Jeremy Scruggs Appellate case # 2019-001200

Date: 7/30/19

NUMBER OF PAGES (including cover sheet): 5

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ATTENTION:

Re-Sending Appeal,
Rule 203(B)
Letter to client