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AUG 14 2020

The South Carolina Court of Appeals

SC Court of Appeals
Appellant

JEROME Mc DANIEL #166436

v.

South Carolina Department of Probation, Parole and Pardon Services

Respondent

Reply Brief

The parole board has repeatedly denied Appellant parole due to: 1) The nature and seriousness of the current offense, 2) An indication of violence in this or previous offense and, 3) The use of a deadly weapon in this or previous offense.

All three reason the Appellant cannot change, because these reason are facts of the case.

The Appellant simply points out to Court that the Appellant cannot change facts of the case and if the Appellant is repeatedly denied parole because of the facts of the case,

Then Appellant is being denied a realistic opportunity to participate in a parole hearing, where the purpose of parole is parole the person when they have rehabilitate themselves, Pursuant to *Morrissey vs. Brewer* 92 S.Ct 2593 (1972).

The purpose of parole is to help individuals reintegrate into society as constructive individuals as soon as they are able, without being confined for the full term of the sentence imposed.

It also serves to alleviate the cost to society of keeping individuals in prison.

WHEREFORE, I pray this grant immediate release because my right have been violated years ago and/or this case he remanded to the ALC to make a determination whether the parole board denied me a realistic opportunity to participate in a parole by denying me on the facts,

Being I can not change the facts of the case and to deny me based on the facts of the case makes me parole ineligible.

8/10/20 sc
Date

151 Jerome Mc Daniel #166436
JEROME MC DANIEL #166436
B-B-42
Ridgeland, Corr. Inst
P.O. Box 2039
Ridgeland SC 29936

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SC Court of Appeals

Certificate of Service

I The pro se Appellant, JEROME MC DANIEL hereby certify that serve A copy of Appellant Reply Brief on TOMMY EVANS, Jr Assistant General Counsel; DEPARTMENT OF PROBATION, PAROLE, & PARDON SERVICES; 2221 DEVINE Street, Suite G, Columbia South Carolina 29250, by deposit the same United State Mailbox

8/10/20 sc

Date

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SC Court of Appeals

S.C. Court of Appeals
P.O. Box 1629
Columbia SC. 29211-1629

RE: JEROME ME DANIEL #166436 v. South Carolina Department of Probation, Parole
AND PARDON SERVICES,

Appellate Case No. 2019-001935

DEAR CLERK
Enclosed for your filing is my Reply Brief

8/10/2020
Date

B/ Jerome ME Daniel #166436
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Ridgewood SC 29936

Jerome Mc Daniel #166436 -B-B-42

Ridgeland Correctional Institution

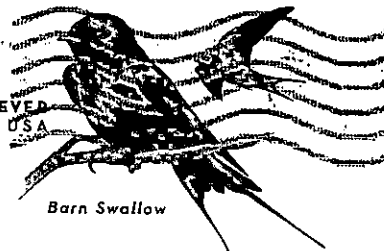
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INSTITUTION

SC Court of Appeals

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South Carolina Court of Appeals

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