

State of South Carolina
In The Court of Appeals

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SC Court of Appeals

Appeal From the Administrative Law Court
The Honorable Milton Kimpson, Administrative Law Judge
Docket Number 19-ALJ-15-0017-AP

Appellant Case No: 2019-001935

JEROME MS DANIEL #166436

Appellant

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 REASONS ARE FACTS OF THE CASE.

The Appellant simply points out to Court that the Appellant can not 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.

8-26-2020 sc,
DATE

1st Jerome McDaniel #166436
JEROME McDaniel #166436
SAV-B-34
Ridgeland, Corr. Inst
P.O. Box 2039
Ridgeland SC 29936

Certificate of Service

I the pro se Appellant, JEROME ME DANIEL hereby certify that serve a copy of Appellants Reply Brief and Motion for Extension of Time on Tommy EVANS, JR Assistant General Counsel; Department of Probation, Parole, & Pardon Services; 2221 Devine Street, Suite 6, Columbia South Carolina 29250, by deposit the same United State Mailbox.

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151 Jerome ME Daniel #166436
JEROME ME DANIEL #166436
SAV-B-34
Ridgeland Corr. Inst
P.O. Box 2039
Ridgeland, SC 29936

South Carolina Court of Appeals
P.O. Box 1629
Columbia, SC 29211-1629

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RE: JEROME MC 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 and Motion for Extension
of Time.

8-26-2020 sc

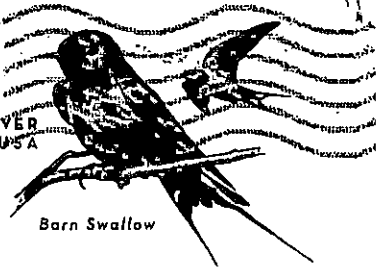
Date

151 Jerome Mc Daniel #166436
JEROME MC DANIEL
166436 SAV-B-34
Ridgeland, Corr. Inst
P.O. Box 2039
Ridgeland SC 29936

Jerome Mc Daniel #166436 Sav-B-34
Ridgeland Correctional Institution
P.O. Box 2039
Ridgeland SC 29936

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South Carolina Court of Appeals
Jenny Abbott Kitchings, Clerk
Post Office Box 11629
Columbia SC 29211

29211-162929

