

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

H. W. Funderburk, Administrative Law Judge

Case No. 19-ALJ-15-0061-AP

South Carolina Department of
Probation, Parole, and Pardon
Services,

Respondent,

v.

Joseph G. Kelsey, #217218,

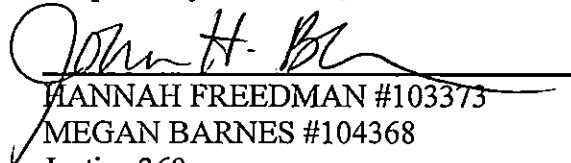
Appellant.

RECEIVED
NOV 03 2020
SC Court of Appeals

**MOTION FOR LEAVE TO PROCEED
IN FORMA PAUPERIS**

Appellant, Joseph G. Kelsey, respectfully moves this Court for leave to proceed *in forma pauperis*. Appellant does not have the funds available to pay the costs of filing and service in the present matter. Appellant's affidavit is attached.

Respectfully submitted,


HANNAH FREEDMAN #103373
MEGAN BARNES #104368

Justice 360
900 Elmwood Ave., Suite 200
Columbia, SC 29201
(803) 765-1044

JOHN H. BLUME #747
Cornell Law School159
Charles Evans Hughes Hall
Ithaca, NY 14853
(607) 255-1030
jb94@cornell.edu

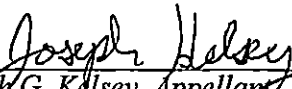
JON OZMINT #7107
The Ozmint Firm
5205 Forest Drive, Suite 1
Columbia, SC 29206
(803) 782-0042
jon@ozmint.com
Attorneys for Appellant

October 29, 2020

**APPLICATION TO PROCEED WITHOUT PAYMENT OF COSTS AND AFFIDAVIT IN
SUPPORT THEREOF**

I, Joseph G. Kelsey, hereby apply for leave to proceed in this action without prepayment of fees or costs or security therefor. In support of my application I declare under penalty of perjury that the following facts are true:

- (1) I am the appellant in this action, and I believe I am entitled to redress.
- (2) Because of my poverty I am unable to pay the costs of said proceeding or give security thereof.



Joseph G. Kelsey, Appellant

SWORN or affirmed to and subscribed before me this
22 day of October, 2020.



Notary Public for the State of South Carolina.

My Commission Expires: 6/16/2030

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE AMINISTRATIVE LAW COURT
The Honorable H.W. Funderburk, Jr

Case No. 19-ALJ-15-0061

RECEIVED
NOV 03 2020
SC Court of Appeals

South Carolina Department of
Probation, Parole and Pardon ServicesRespondent.

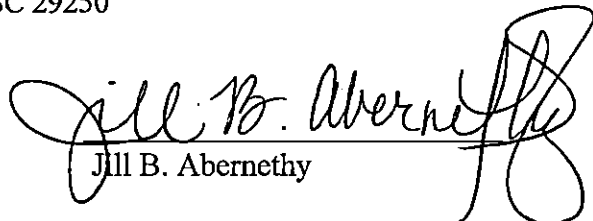
v.

Joseph G. Kelsey, SCDC#217218Appellant,

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Appellant's Motion for Leave to Proceed *Informa Pauperis* was served by first class United States mail, postage prepaid, this 29th day of October, 2020 upon the following:

Matthew Buchanan
Department of Probation, Parole and Pardon Services
P.O. Box 50666
Columbia, SC 29250


Jill B. Abernethy

RECEIVED

NOV 03 2020

SC Court of Appeals

October 29, 2020

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

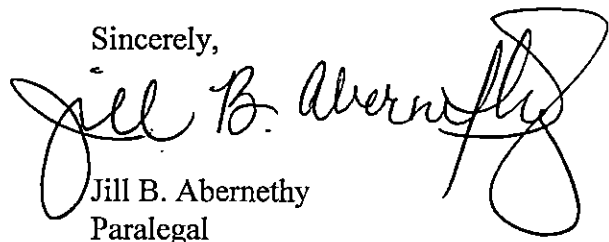
RE: *Joseph G. Kelsey, SCDC#217218 v. SC Department of Probation, Parole,
& Pardon Services*

Dear Ms. Kitchings:

Please find enclosed for filing, along with certificate of service, the original and one copy each of Appellant's Notice of Appeal and Motion for Leave to Proceed *In Forma Pauperis* in regards to the above captioned case. Please clock-in the extra copies and return it to me in the enclosed self-addressed stamped envelope.

If you should have any questions, please feel free to contact our office.

Sincerely,



Jill B. Abernethy
Paralegal

Enclosure

cc: Matthew Buchanan, Esq.
Joseph G. Kelsey
Administrative Law Court



U.S. POSTAGE PAID
P.O. BOX 500
COLUMBIA, SC
29201
NOV 03 20
\$2.60
R2304HT08091-34

JUSTICE (360) ADVANCING EQUALITY IN THE
CRIMINAL JUSTICE SYSTEM
900 ELMWOOD AVENUE
SUITE 500
COLUMBIA, SC 29201

RECEIVED

NOV 03 2020

SC Court of Appeals

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