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The South Carolina Court of Appeals

DEC 21 2020

SC Court of Appeals

JEROME ME DANIEL #166436

Appellant

✓

South Carolina Department of Probation, Parole and Pardon Services

Respondent

Appellate Case No. 2019-001935

The Honorable Milton L. Kimpson

ALL Docket No. 19-ALJ-15-0017-AP

Final Brief

12-15-20, SC

DATE

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SAV - B-34

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Pro SE Appellant

## Table of Contents

Argument in Reply .....	iii
1. Appellant can not change the facts of his case and to deny him over something he can not change makes him Ineligible for Parole!	

Conclusion.....	iv
Certificate of Counsel.....	iv

## Table of Authorities

CASE

N/A

PAGES

## Argument in Reply

1. CAN the Appellant change the facts of the case?

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 reasons the Appellant cannot change, because these are facts of the case that will never change!!!

The Appellant simply points out to Court that the Appellant can not change facts of the case and if 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.

Respondent admits in their brief that the denial of parole is nothing more than a routine denial of parole,!!! Parole Board... decision to be a routine denial of parole..." The Appellant's life, liberty and just results is more than routine. Slavery is/was more than routine and must stop!!!

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Appellant's Health. Appellant is on a Epap Machine, He takes high blood pressure Medication, takes cholesterol Medication and he is 50 years old. Blacks ARE MORE likely to get COVID-19 than others. Appellate prays the court takes this into Consideration.

Conclusion

The Appellant is powerless to change the facts of the case and to deny over something he is powerless to change make him parole ineligible and such Routine practice should be abolished!!!

Certificate of Counsel

The undersigned certified that this final Reply Brief complies with Rule 211(B), SCACR.

12-15-20 sc

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