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2020-001486

Apr 12 2021

S.C. SUPREME COURT

**The Supreme Court of
South Carolina**

ANDREW YOUNG,

Petitioner,

v.

MARK KEEL,

Respondent.

From the Laurens County Court of Common Pleas

Appellate Case No. 2018-000082

Published Op. No. 5759

REQUEST FOR LEAVE TO FILE BRIEF AS *AMICI CURIAE*

Amici curiae respectfully request leave to file a brief under Rule 213 of the South Carolina Appellate Rules. In support thereof, counsel states as follows:

Amici curiae SOUTH CAROLINA JUSTICE PROJECT and ROOT & REBOUND are not-for-profit organizations that advocate for criminal justice reform in South Carolina. They share a common interest in reducing collateral consequences for criminal offenders and, in that capacity, engage in substantial work related to the sex offender registry and the expungement of criminal records.

Amicus ROOT & REBOUND uses legal advocacy, public education, policy reform, and litigation to assist victims of mass incarceration. ROOT & REBOUND invests significant time and resources to help individuals pursue expungement of their criminal records.

Likewise, *amicus* SOUTH CAROLINA JUSTICE PROJECT is a nonpartisan nonprofit organization that provides legal representation for victims of civil rights violations in South Carolina. Relevant here, SOUTH CAROLINA

JUSTICE PROJECT represents individuals that seek removal from the South Carolina Sex Offender Registry.

If granted permission, *amici* seek to present the Court with a comparative statutory analysis of the South Carolina registry and expungement schemes. *Amici* believe that the relevant analysis is not fully developed in the parties' briefing and that additional briefing would aid the Court in its resolution of the question *sub judice*.

Respectfully submitted to the Supreme Court of South Carolina by
facsimile on this **12th day of April, 2021**.

signature line on following page

s/ Allen Chaney

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