

**MOTION FOR SUPPLEMENTAL  
RECORD ON APPEAL**  
THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
S. Phillip Lenski, Administrative Law Judge

Appellate Case No. 2023-001342

Michael Carwane , Appellant.  
v.  
South Carolina Department of Juvenile Justice Respondent.

**MOTION FOR SUPPLEMENTAL RECORD ON APPEAL**

Appellant is formally requesting at this time for the Court to consider a Motion for Supplemental Record On Appeal. Appellant requests to add a copy of the Original request and associated Appeal To Order Of Dismissal from the lower Administrative Law Court, Docket No. 23-ALJ-30-0111-IJ referenced in this Appeal. Appellant proposes adding the supplement to the existing record on appeal indexed as Exhibit 33, beginning page 216 in that index. As there was no transcript for this case, this will allow the Appellant to cross-reference materials as previously submit to the lower court for review.

January 8, 2024



Michael Carwane, pro se  
302 The Heights Third Ave  
Saluda, South Carolina 29138  
(828) 301-7106

# Exhibit 33

STATE OF SOUTH CAROLINA  
ADMINISTRATIVE LAW COURT

Michael Carwane

Appellant/Petitioner,

vs.

SC Department of Juvenile Justice

Respondent.

Docket No. -ALJ-

PROOF OF SERVICE

The State of South Carolina,  
Before the SC State Employee  
Grievance Committee

I hereby certify that I have served the Motion To Compel  
(Description of the document) in the above-captioned matter by depositing it in the  
United State Mail, postage prepaid, on March 8, 2023 (Month/Day/Year) to the  
below named parties at their address of record:

State Accident Fund  
Name  
113 Reed Ave  
Address  
Lexington SC 29071  
City/State/Zip

Saluda Police Department  
Name  
1015 Jefferson St  
Address  
Saluda SC 29138  
City/State/Zip

Saluda County Administrator  
Name 90 Sandra Padgett  
400 W Highland St  
Address  
Saluda, SC 29138  
City/State/Zip

South Carolina Department of Juvenile Justice  
Name 90 Sara Bunge  
220 Executive Center Dr.  
Address  
Columbia, SC 29210  
City/State/Zip

Michael Carwane  
(Print Your Name)

Michael Carwane  
(Your Signature)

302 The Heights Third Ave  
(Street)

Saluda SC 29138  
(City, State, Zip Code)

**Request for Waiver and Affidavit**  
**SC Administrative Law Court**  
1205 Pendleton St., Suite 224, Columbia, SC 29201


Michael Carwane  
Name of Requestor

Home Phone 828-301-7106  
Office or Cell Phone

302 The Heights Third Ave  
Address

City Saluda State SC Zip 29188

I, Michael Carwane (your name), being duly sworn, state that I am requesting a hearing before the Administrative Law Court and that as shown on the attached **Financial Statement**, I do not have the funds available to pay the costs of filing this action. Therefore, I request that the filing fee associated with this action be waived.

  
Signature of Requestor

Sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

\_\_\_\_\_  
Notary Public of South Carolina

My Commissions expires: \_\_\_\_\_

*The section below to be completed by the Court*

ORDER by the Court:

\_\_\_\_\_ Fee Waived (The action will be processed and assigned to a Judge.)

\_\_\_\_\_ Waiver Denied (The filing fee must be paid within 10 days of the receipt of this order.)

\_\_\_\_\_  
Ralph K. Anderson, III  
Chief Judge

\_\_\_\_\_  
Date

Instructions - If you believe you are financially unable to pay the required filing fee in order to file a case with the Administrative Law Court, you will need to complete the Request for Waiver and Affidavit form and the Financial Statement form. (See ALC Rule 71). These forms must be completed in their entirety and must be signed by you and notarized by a Notary Public of South Carolina. The completed forms should be mailed to the Administrative Law Court at the address on the top of the forms, along with all of your documentation for filing your case. The Chief Judge will review your forms, and at his discretion, will either grant or deny your request to waive the filing fee. You will be notified in writing of his decision. If you have any questions regarding these forms, you may contact the Clerk's Office at (803) 734-0550.

**Financial Statement**  
**SC Administrative Law Court**  
**1205 Pendleton St., Suite 224, Columbia, SC 29201**

Full Name: Michael Robert Caruane I am 52 years of age

Employer's Name: \_\_\_\_\_ Full time: [ ] Part time: [ ] Hours per week: \_\_\_\_\_

Employer's Address: \_\_\_\_\_

Gross (before deductions) Monthly wages: \_\_\_\_\_ Hourly wages: \_\_\_\_\_

If unemployed, date and salary of last employment: August 2022 ~ 43,000 annually

Other income per month:		Monthly expenses:	
Public Assistance:	\$ <u>0</u>	Rent/Mortgage:	\$ <u>0</u>
Unemployment:	\$ <u>0</u>	Car lease/payment:	\$ <u>0</u>
Child Support:	\$ <u>0</u>	Food:	\$ <u>600</u>
Social Security:	\$ <u>0</u>	Utilities:	\$ <u>200</u>
Gifts/Other:	\$ _____	Credit cards:	\$ <u>0</u>

Assets:

Checking Account: \$ 2500

Savings Account: \$ 0

Est. Home Value: \$ 40,000

Other Assets: \$ property 65,000

Automobile: Year: 1996  
 Make/Model: Ford F-150

My Spouse/Partner/Live-in's Name is: \_\_\_\_\_ Age: \_\_\_\_\_ Check if no other adult in household:

Employer's Name: \_\_\_\_\_ Full time: [ ] Part time: [ ] Hours per week: \_\_\_\_\_

Employer's address: \_\_\_\_\_

Gross (before deductions) Monthly wages: \_\_\_\_\_ Hourly wages: \_\_\_\_\_

If unemployed, date and salary of last employment: \_\_\_\_\_

Other household income and assets of Spouse/Partner/Live-in Companion:

Public Assistance:	\$ _____	Checking Account:	\$ _____
Unemployment:	\$ _____	Savings Account:	\$ _____
Child Support:	\$ _____	Other:	\$ _____
Social Security:	\$ _____	Automobile:	Year: _____
Gifts/Other:	\$ _____	Make/Model:	_____

TOTAL MONTHLY HOUSEHOLD INCOME: \$ 0

TOTAL MONTHLY HOUSEHOLD EXPENSES: \$ ~1200

List the names and ages of all other members of your household whom you financially support: (use reverse side if more space needed)

Name: \_\_\_\_\_ Age: \_\_\_\_\_ Relation: \_\_\_\_\_

Name: \_\_\_\_\_ Age: \_\_\_\_\_ Relation: \_\_\_\_\_

To the best of my knowledge, the information above is true and accurate. I have made no attempt to misrepresent my financial condition.

Michael Robert Caruane  
 Signature

March 7, 2023  
 Date

**STATE OF SOUTH CAROLINA  
ADMINISTRATIVE LAW COURT**

Michael Carwane	)	Docket No. 23-ALJ-30-0111-IJ
	)	
Petitioner.	)	
v.	)	<b>APPEAL TO ORDER OF</b>
	)	
South Carolina Department of Juvenile	)	<b>DISMISSAL</b>
Justice,	)	
	)	
Respondent.	)	
_____	)	

Petitioner respectfully requests at this time an Appeal to the Order of Dismissal (filed June 19, 2023) in this case against the South Carolina Department of Juvenile Justice. The Petitioner was given the expectation by the court that a hearing would be held to review the facts of the initial petition to the Court seeking Injunctive Relief regarding a Grievance process to convene in the State Human Resources Administration authority. It may be in this Court's additional interest to assist in the facilitation of a fair and healthy presentation for the formal Grievance Hearing due to serving as the venue for the next step appeal, if necessary. The Petitioner had made multiple reasonable, legal requests for Discovery that were not fully honored by the named organizations. This included the Defendant, South Carolina Department of Juvenile Justice (SCDJJ), the Saluda Police Department, the State Accident Fund, and the Saluda County Administrator (exhibit 1). The Petitioner made good faith efforts to work directly with the organizations to secure the requested Discovery materials required for presentation in the associated Grievance Hearing. That good faith effort was not matched by those

organizations, nor represented fully to this Court in their responses to the Court. The Petitioner chose the Administrative Law Court to assist with enforcement of the legal Discovery requests, only after being thwarted by the representatives of those organizations with various dubious lawyer tactics. Rather than continue to fruitlessly debate back and forth with Defense Attorneys the Petitioner has no authority over, the Petitioner required the Injunctive oversight of this court for proper resolution. The Defense Lawyers have omitted several key points to this court in their email responses to the Clerk of Court. The Petitioner trusted that there would be a process to include opportunity to present the facts to the court (to include those purposefully omitted by the Defense Lawyers), without having to reengage again in email banter with those attorneys. That had not worked originally, even when supported by legal Subpoena and Motion to Compel documents. In the case of the Saluda Police Department and SCDJJ, further direct interaction could be dangerous, hurtful, or unsafe for the Petitioner as evidenced by the nature of the type of behaviors previously demonstrated by those organizations towards the Petitioner (exhibit 3,4). The Petitioner is relying on the facilitation of the Judge to guide this conversation in a way that is not additionally harmful to the Petitioner, as the Petitioner has previously been subjected to real harms and damages by the actions of the Defendant. The Petitioner again humbly seeks from the Court the continuation of the facilitation of this process to include formal opportunity to communicate as expected in a hearing.

The Order Of Dismissal falsely references as an explanation of the reason for Dismissal that, "As of the date of this Order, the Petitioner has not filed a reply nor

responded to any emails from the court." The statement by the Court is inaccurate for the following reasons:

- 1) The Petitioner was erringly not included in the initial communications by the Clerk of Court (confidential exhibit 2). The Petitioner was only later included in (some of?) the emails among the Defense attorneys and Clerk of Court, after calling the Clerk of Court, Erika Easler, to communicate this desire to be included in all communications.
- 2) During the phone contact with the Clerk of Court, Petitioner responded to the Clerk of Court stating that the Defense attorneys had claimed to the Court to have already provided Discovery. Petitioner refuted those claims, clarifying that for some of the organizations there had only been a partial release of requested documents. It would be lying by omission for a Defense Attorney to now represent to the court having already fully satisfied the requests of the Subpoena or Motion to Compel.
- 3) During the phone contact with the Clerk of Court, Petitioner responded to being notified that Attorney Gene Matthews denied ever being served documentation for Discovery. Again, Petitioner refuted that claim as a misrepresentation of all the facts. Petitioner was comfortable with the security that came from the Clerk of Court's presentation to him that there would be opportunity for Petitioner to have his day in court to share his perspective. Thus, Petitioner was underserved by the Order of Dismissal because it both prevented that opportunity to "have his day in court", and also ignored that there had been an articulated response by the Petitioner. Again, this communication is not best represented by the

referenced court explanation, "As of the date of this Order, the Petitioner has not filed a reply nor responded to any emails from the court." The Clerk of Court must be tasked with preserving the content and tenor of that dialogue for the Court.

- 4) Upon receipt of the Order of Dismissal, Petitioner immediately phoned the Clerk of Court to respectfully question the outcome. When asked directly about the claim that the, "Petitioner has not filed a reply nor responded to any emails from the court" the Clerk of Court was unwilling to confirm what emails were being referenced, check that the Petitioner had in fact been included in the referred to emails (as Petitioner had previously been left out), or state that there were any emails that had called for an email response from the Petitioner. The only recourse Petitioner was given (without the aid of understanding this language of the Order Of Dismissal regarding the emails) was for the Appeal to be drafted, and submit within ten days. This task is an additional unnecessary hardship for a pro se litigant, having to navigate additional obstacles by Defense Attorneys that do not want a Truthful presentation of their client's heinous and illegal actions to be available in the Grievance review (exhibit 24).
- 5) The emails received by the Petitioner established and supported the expectation of a formal hearing date as the next opportunity for facilitation of Injunctive relief for the Petitioner. Dates were proposed by the Clerk of Court. The response of the Petitioner was to clear the calendar (including with employment) for the contingency of either date (May 17-18, 2023). It was, in fact, the Defense attorneys that did not (or would not) ratify a date for the hearing to further delay

and create obstacles for the Petitioner (confidential exhibit 2). The only need the Petitioner has had for delay, was due to the expectation that full Discovery be made available prior to being forced to navigate a Grievance review hearing without those materials. The Order of Dismissal date itself predated the range of dates communicated by the Clerk of Court as options to the Defense Attorneys, further supporting the Respondent's perspective that this matter was not yet ripe.

- 6) The Petitioner was not provided accurate contact information regarding the attorney involved representing the Saluda Police Department for communication in this setting, compounded by that organization failing to respond to email sent by Petitioner to them.
- 7) The Clerk of Court represented to the Petitioner that the Court, "was still waiting" for responses from all the organizations involved in the Discovery requests. The Petitioner, having never seen an email response by one of the organizations (Saluda Police Department) attributed the delay in rescheduling for the hearing to be due to the Court's patience with that organization (no timeframe deadline was posted for the Petitioner's perspective by the Clerk of Court). It was not unreasonable from the perspective of the Petitioner to believe that the court was awaiting action by the various respondents (as he was told), not that the Petitioner was failing to respond. The Petitioner has accepted many aspects of what is out of his direct control involved in the investigations of his reasonable and appropriate participation in the processes of his related claims. One of those aspects not in the control of the Petitioner is the timeframes of the courts, to include scheduling, so the Petitioner saw no reason to question it. In fact, it was

only the attorneys, not the Petitioner that was given the grace of being allowed input about personal availability or conflicts for the proposed court dates. The defense attorneys, in contrast, have taken advantage of that acceptance (patience) here by the Plaintiff to feign as if they had done their parts, and the Petitioner was somehow unresponsive. As an example, Attorney Gene Matthews sought simultaneously to delay participation in responding to deadlines with the Grievance review (citing back injuries) while working vigilantly to have a parallel Federal Court Motion by the Petitioner unfold. Representatives of the SCDJJ have now delayed these processes for about three years, seeking to capitalize on the passage of time in regards to the available record, attrition of involved staff, natural weariness of the Plaintiff, and to manage the public/political messages the rewriting of history allows them.

With regards to the Saluda County Administrator, Petitioner did receive a mailed response by the deadline. However, no materials were produced to honor the Discovery request. When Petitioner sought clarity in dialogue with the representatives both through face-to-face office visit, email, and then phone contact with assigned Attorney G. Boseman, Petitioner sought explanation in good faith for the failure to produce requested materials. The Attorney stated that the video footage was no longer available. Petitioner requested a copy of the County policy to determine if the video footage was handled and disposed of within policy. Attorney then claimed there was no county policy for that aspect of management of county facilities. None was provided. In further attempt to determine the veracity of the claim to be no management policy for that County equipment, Petitioner requested to be given explanation about other agencies

that had either requested or received the same video footage. The Attorney refused to answer that question, indicating that the Plaintiff would have to ask those other organizations. This placed the Petitioner in an untenable position as SCDJJ had previously deflected the same request to the purview of the Saluda County Administrator, effectively sealing out Petitioner for that reasonable Discovery request for information directly vital to the Grievance claim. Similarly, SCDJJ had previously denied having oversight of some of the video monitoring equipment housed in the facility (as presented in findings of internal Inspector General investigation). The apparent obfuscation of the facts here, coupled with the evidence of monitoring equipment clearly marked with SCDJJ property labels (see attachment photo), lead Petitioner to question the veracity and tactics of the lawyers regarding their claims. Again, this is why the Plaintiff sought Injunctive relief from the court, as the Petitioner has no regulatory oversight to enforce these organizations to respond truthfully or fully, alone. In the spirit of good faith, Petitioner accepted the offer of Attorney Ginny Bozeman to put in writing her responses to the follow up questions about why Discovery was not provided. She then did not provide that, instead sending a second letter parroting the response already received from the Saluda County Administrator (confidential exhibit 23), without giving the written answers regarding having no county policy, why she was unwilling to answer regarding release of the same information to alternate organizations, or even to confirm contact with agents of those organizations, or in the case of SCDJJ to disclose the nature of the relationship with access, ownership, and management of the equipment itself. She did not do what she stated she would. That is where I need the courts inclusion, not just to accept the Attorney's claim that her organization already responded

to the Subpoena request. I already was accommodating of that much when choosing the language for the submit Motion to Compel to this organization, acknowledging the original response. The Petitioner immediately took further good faith action to follow through on this redirection by the Saluda County Administrator, petitioning to the Grievance review Human Resource administration for permission to submit a Subpoena amendment to SCDJJ, beyond the deadline. This was granted, in acknowledgment of the original effort by Plaintiff to acquire the Discovery information, and the initial deflection by SCDJJ of its ownership for it. Regarding the potential destruction of the recorded video record, it appears that by channeling the Petitioner through the lengthy SC Human Affairs Commission and EEOC processes, to first acquire a proper Right To Sue Notice and subsequent delays with honoring Discovery, the SCDJJ is then insulated by defaulting to expired opportunity to request available footage, passed deadlines for filing, statute of limitations, and ample opportunity to alter internal human resource records due to reliance on the available internal formal reporting methods, by design.

With regards to the Saluda Police Department, the Subpoena was ignored without response until well past the named deadline. The Motion to Compel was subsequently also ignored beyond the named deadline. When a response was finally provided, it contained only one item from the requested materials; the police incident report, and no further explanation for the missing materials. Why was there such significant delay for this particular information which should be routinely available to any citizen requesting (even without multiple Subpoenas and Motion to Compel requests) a copy of a Police report naming them as a participant? The answer from the perspective of the Petitioner

is, and always was, that the incident was another example of dangerous involvement by the local law enforcement community acting improperly at the request of SCDJJ supervisor, Sandra Callaham, with the purpose of bullying and intimidation of a subordinate employee. Saluda is a relatively small town, where the SCDJJ employee was able to misuse her power, based on her existing relationships, slanderous commentary about Plaintiff, and status within the town. Hence, the Attorney here is also motivated to prevent the Truth and legitimacy of the claim to have access to the remainder of the requested materials, as it would further implicate that agency for their complicit activity, with that State Agency of SCDJJ. Of note, the Saluda Police Department representative that provided only an incident report without the full response to the Subpoena (or any explanation for the missing materials) is the same employee named by the Petitioner as being a participant in the Saluda Police surveillance and intimidation tactics, as reported to SCDJJ Human Resources investigator, Norberto Perez in 2020 and 2021. She is at this stage motivated to hide the Truth of her behaviors and that of the involved local law enforcement community. In effect, this is a "Fox guarding the hen house" scenario and conflict of interests for that department (exhibit 20). These are the matters that deserve a full, Truthful account for the arbitrators in the Grievance review, as they are the topics that escalated to the retaliatory termination of the Petitioner by SCDJJ.

In the Workers Compensation Review of the same requested materials, the Commissioner was also petitioned to aid the Plaintiff in enforcement of the same information from the Saluda Police Department. No full response was provided, jeopardizing Petitioner's position in multiple venues (confidential exhibit 19). Thus, it

was no surprise, that their stance in that venue now is cross-referencing the outcome of the Order Of Dismissal from June 19, 2023 in this venue, as if that lends legitimacy to their stall legal tactics employed. The best way to phrase it, is that the legal Discovery request was never honored, and no substantive effort has been given by others to answer the question "why". It appears that the defense lawyers are being given a benefit of the doubt not being allotted to a pro se presentation of Truth. A standard that should apply for the Saluda Police Department should include simple comparison of the materials requested versus those provided to determine if the Discovery request was fully honored, rather than being allowed to hide behind the (only partial Truth) of having sent one of the requested materials only (lying by omission). Furthermore, the withholding of Discovery in the form of Police body camera video, prevents that department from being exposed for the errors and omissions of their presented Incident report (which is why it was vitally requested by Plaintiff) They should not be allowed to use their drafting of an Incident report to hide their own participation in the harmful activities inflicted upon the Plaintiff (Exhibit 22). This collusion with SCDJJ, also had a detrimental effect on the Plaintiff's ability to receive proper medical care, as seen in the ER report.

With regards to the State Accident Fund, Attorney Nick Haigler made various false claims. Again, like with the other organizations some selected materials were provided to the Petitioner, including some items not requested, while choosing to withhold other requested materials. He is currently deflecting the legitimate Discovery requests with dismissive phrases like "agree to disagree". When the Petitioner responded appropriately and reasonably by making additional formal Subpoena and

Motion to Compel requests, Attorney Nick Haigler represented to the Courts that the Petitioner's contact "can only be meant to harass the SAF", as if asking formally for the original materials should be illegitimate (exhibit 5). This Attorney should not be allowed to hold positions on both sides of the same issue, by both arguing for more communication from the Respondent, while claiming harassment for engaging in that communication. He cannot produce any communication from the Respondent that is offensive, unprofessional, or otherwise worthy of that label, because it does not exist. I did not choose to stand up to the Bullying of my employer, just to later be vilified further by its hired Attorneys. In the Order of Dismissal here, this attorney is "asking the court to deny the Petitioner's motion because the SAF has thrice previously provided the requested information of the Petitioner". Upon receipt of the repeated copies of the same information, Petitioner made the rational, reasonable observation to the Attorney that sending the same initial, incomplete, information repeatedly (when not requested or required) still does not satisfy the request for the unsent additional documents. I trust that this Court can also discern the difference, rather than stand behind the initial Order of Dismissal, based upon the incomplete description of the facts by the Defense Attorney. In essence, the Defense Attorneys were attempting to marginalize or disparage the credibility of the Plaintiff as a tactic to deflect from their own decision to deny full Discovery. Again, it appeared that rather than comply with a lawful process, SCDJJ was intending to refuse, delay, and "muddy the waters" to deflect from their own liability. Attorney Nick Haigler went even further to disparage the efforts of the Plaintiff to claim the Motion to Compel was done in error regarding the dates (though he was in error handling the formal request clearly labeled for the Grievance Hearing venue, not

the Worker's Compensation Hearing he was addressing). In good faith, Plaintiff reached out to the Worker's Compensation attorneys and Clerk to try to have a clear record for all involved. Unfortunately, the Attorney continued to employ these tactics at the pre-hearing, and then again by reaching out to influence the Discovery process in this venue, by contacting the organization's representatives proclaiming false outcomes for the Discovery process in the Worker's Compensation venue. Meanwhile, the Plaintiff was being held to the standard of not discussing (mixing) the content of simultaneous court processes. This disadvantaged the Plaintiff, due to the attorney's apparent freedom to do the same. Ultimately, the Attorney claimed that some information requested was not available due to the death of the investigating representative for the State Accident Fund. Again, when the Defendants are motivated to disguise the recorded Truth and testimony, it appears false that a major state agency would not have its own record of the testimony that it made its decision upon to reject services to an injured state employee. Said another way, it is not the deceased employee's responsibility to preserve or maintain his former employer's records. Nor was it plausible that the sad death of the employee occurred as he was in transit to file, record, or preserve the information upon which his employer previously made its decision that had an adverse effect on the Plaintiff's case. In fact, the provided Discovery illustrates that there was collaboration between SCDJJ staff and the State Accident Fund investigator culminating in a decision to not preserve the over-two-hours of honest testimony provided by the Plaintiff seeking support for work-related injury (confidential exhibit 8). Of paramount importance here is that now the demise of the investigator has now been used to also be a universal answer for why Discovery was not provided. This should

have no bearing on the other listed items that were not linked in any manner to the deceased employee, such as the initial recorded interview with Courtney Toole (with the State Accident Fund) or statements from the named witnesses and participants in the formal HR complaint on this matter to SCDJJ (confidential exhibit 9). Nor does it waive the fact that the Saluda Police Department at that time, had provided no response to the Commissioner seeking to enforce the Subpoenas. To this point, Attorney Nick Haigler used the fact that he was representing multiple diverse parties simultaneously, to use the response for one party as a blanket response to hide a less full response from another. Granted his paperwork requirements may have been kept distinct, but one can see in the type of answers and verbal communications to the Plaintiff and court that his answers were not distinct per client. Attorney Nick Haigler now presents that because he disclosed his privileged client list to Commissioner Dooley he has satisfied the full Motion to Compel requirements. As a pro se litigant, I do not have a full understanding of the law, but I do not logically see how answering the "Who" of Who the Attorney spoke with for privileged attorney-client privilege answers the question of "What" for What was provided as Discovery documents by the Defendant (exhibit 10). Surely an attorney speaking with a client does not negate the legal request for that client to provide Discovery documents. Again, the better measuring stick is not what the Defense Attorney has claimed to the Courts, but by comparing what was provided relative to the originally requested Discovery documents. As stated above, an attorney lying by omission should not be overlooked by the Court, or the pro se litigant's opportunity to best communicate his perspective squashed based on the narrow, biased presentation of the Defense Attorney. Simultaneously, this Attorney held to a high level of

expectation that the Plaintiff comply fully with his own insistence on the Plaintiffs participation in a fact-finding Deposition, to allow him to better establish his own presentation (confidential exhibit 11). This disparity is alarming to a pro se litigant with expectations of equity in the legal landscape. When discussing at the Workman's Compensation pre-hearing, Attorney Nick Haigler, answered there would be a ALC Hearing to resolve the matters of Discovery, showing his own expectation of the yet-to-come Administrative Law Court hearing request made by the Petitioner.

With regards to the SCDJJ, attorney Gene Matthews has not acted on several points in a respectable manner or in good faith on these matters. He orchestrated the SCDJJ response to set the table for a defense built upon release of no full Discovery, while blaming the Plaintiff for that failure. He seeks to hide the information, SCDJJ has now hired several Attorneys to bury from not only this Court's fair review, but that of the Public, and the clients that it is charged with serving. This is the climate in which Respondent was forced to seek injunctive relief from the Administrative Law Court in the first place, as he has been powerless to make SCDJJ or its attorneys "do the right thing", follow their own policies, or operate in a manner that does not perpetuate the negative cycles that were in the spotlight during the employee walkout, resignation of Director Freddie Pough, and recent Legislative calls of No Faith in the SCDJJ leadership team, or subsequent high profile class action lawsuits on behalf of the welfare of the juveniles/families that are regularly harmed by SCDJJ. Respondent specifically included on his SCDJJ subpoenas, documents from their Inspector General branch for this reason (exhibit 6). For Petitioner this is not a politicizing of his issues, but a reminder to the Court of the conceptual backdrop for the type of issues that were

challenging SCDJJ (while an employee in good standing) to address and work to solve. Then, like now, Petitioner only witnessed administrators and legal teams working to mitigate or hide liability and responsibility, rather than operate with transparency towards solutions. It is apparent that for Attorney Gene Matthews, SCDJJ Attorney Hill, and others making Petitioner's voice go away is chosen as an easy alternative to releasing documents showing the Truth, or making real change within the organization. Again, this is why Petitioner needs the oversight of a governing organization like the Court, because without that SCDJJ is allowed to be dismissive of his Subpoena requests, with no fear of consequences. For them, there has been no "down side" to their questionable tactics. Thus far, they have effectively been self-regulating on these matters and have proven to Petitioner their willingness to accept behaviors up to and including criminality, ethics violations, and client abuse among their ranks, as long as they can control the narrative. Obviously, that does not make their message the Truth or accurate (no matter how many lawyers put their rubber stamps on it). SCDJJ cannot be allowed to self-regulate if all they need to do to dismiss Court action is to lie to the Court. Again, I speak of the rot of the integrity of this SC state institution, because that indicates directly why I am in need of the oversight of a governing body such as this Court to have any hope of standing up to the machinery of what is wrong, that led to my claims, in an effort to protect and preserve myself in its wake. SCDJJ violated its own internal grievance policy (exhibit 16) by refusing to release requested documents to the Petitioner prior to the initiation of each of the first two steps of the formal grievance process (confidential exhibit 12,13). Those materials were requested by the Petitioner, and may have contributed to better results for the Petitioner during those steps, had

they been provided. Human Resource Director, DeWarren Register, additionally refused release of requested materials, stating that Discovery would occur later as part of a legal process (confidential exhibit 14). When those legal processes subsequently arrived and were again sought as recourse/solution by the Petitioner, those Discovery documents continued to be withheld. Clearly, this stall tactic was wrong. This Human Resource Director was groomed into the same culture that led to his refusal to provide Petitioner access to the Human Resources Department to seek resolution for his unanswered formal complaints initiated over six months prior (exhibit 15). Initially, SCDJJ simply ignored the Subpoena request beyond the deadline, while simultaneously representing to the staff at the SC Human Resource Administration that it would be provided soon. The SCDJJ attorney on record for these matters, Sara Bunge, then refused receipt of the second Subpoena request, without explanation (exhibit 21). Sara Bunge was additionally the lawyer that the EEOC requested that the Plaintiff interact with for these claims (exhibit 22). The Plaintiff did not even receive return mailing receipt from the US Postal Service for months, as SCDJJ sought to deny honoring the repeated legal request. In similar fashion, the other SCDJJ Attorney, Nick Haigler, delayed his signature on his received subpoena from 01/31/2023 until 04/10/2023 while representing to that court that he had been responsive to it. However, the Plaintiff aware of the failed response as the filing deadline imposed by the SC Human Resource Administration approached, contacted that organization requesting support. The Plaintiff was advised to contact Attorney Gene Matthews directly to request if in good faith he would accept by email a secondary copy of the Subpoena rejected by his peer, Attorney Sara Bunge. The Plaintiff discussed and agreed to this proposal, as Plaintiff did not

want to risk approaching SCDJJ attorneys unannounced outside of the SCDJJ corporate building to serve court papers, due to the prior coordinated law enforcement bullying orchestrated by SCDJJ leadership towards the Plaintiff. Human Resource Administrative staff, Heather Kever, also confirmed that she also had contacted and discussed waiver and receipt in good faith by email of the Subpoena with Attorney Gene Matthews. This is how the document was provided. Attorney Gene Matthews agreed. Attorney Gene Matthews also showed understanding of this agreement by subsequently writing in email to the Human Resource Administration that the SCDJJ Discovery documents would soon be sent (exhibit 17), only confirming for the Plaintiff that the issue was now resolved agreeably. However, the documents were never sent, and after an attempt with a separate Motion to Compel communication by the Petitioner, the Injunctive relief was sought from this court. At that point Attorney Gene Matthews seized the opportunity to represent to this Court a response that led to, "the Petitioner's failure to properly serve the Respondent as is required by ALC Rule 11B." This was omitting from the Court his client's role in the initial obstruction and refusal of service (contrary to SCDJJ policy), his subsequent feigning of good faith resolution with Petitioner and SC Human Resource Administration on the matter when requested, and his client's refusal to provide full Discovery as requested dating back to September of 2022, through the two Internal grievance steps, two distinct Subpoena requests, and a distinct Motion to Compel request. Even if the Court is not inclined to hold Attorney Gene Matthews to the standard of operating with a pro se client according to the good faith agreement for waiver one Subpoena (only obstructed by his client), why is there no accounting for his client's responsibility to the two other formal legal documents processed naming his

client? The answer is obvious, that to disclose that omission likely would raise the same questions for the Court, resulting in an outcome other than a summative Order for Dismissal sought as a victory by the Attorney. I will say again that it is these disruptive, dishonest tactics to deny Justice, that forced the Petitioner to seek Injunctive relief and governance by this Court in the first place, and continues to humbly do so. There is nothing inherent in having a law degree that makes this lawyer right or justified in these actions. From the Petitioner's standpoint he should be held to a higher standard for operating during this action in Bad Faith. In that manner he only has mirrored the Bad Faith activities of his client, as they have been allowed to do it unchecked on a much grander scale (exhibit 18). Immediately following the Order for Dismissal, Attorney Gene Matthews doubled down on this behavior by contacting the Human Resource Administration (after the deadline) claiming that the approved revised Subpoena request was now moot too. Effectively, by falsely claiming to this court that his client had already provided full Discovery documents (which they had not) he gained an Order Of Dismissal, which allowed him to now not provide Discovery documents (to include those never provided and others not yet received). This is an illogical circular defense that I choose to refute (confidential exhibit 26).

The Respondent SCDJJ began the failure to exchange information with Petitioner on these topics dating back to its refusal to follow its own policy regarding the Formal Complaint submitted to their Human Resources office in September 2021. It again repeated this by ignoring that element completely in its response to the parallel SC Human Affairs Complaint filed by the Petitioner. More recently in 2022, the Petitioner sought and was refused access to materials (again entitled by the SCDJJ

Policy) through the Course of his Step One and Two Internal Grievance processes. A range of tactics have been deployed by the Respondent and its representatives to deflect the legitimate and well-articulated, repeated requests. Whereby, Petitioner sought out Injunctive relief from the Authority of this Court, rather than continue to be harmed by the consequences of further refusal of documents prior to the SC Human Resources Administration, over which this Court has proper authority. Petitioner would like opportunity to further present these and other requested facts at a formal hearing to enforce the involved issues. At this time, through issuance of this written Appeal, Petitioner humbly asks for that continuing support and reconsideration of the associated Order of Dismissal.

RESPECTFULLY SUBMITTED,

*Michael Carwane*

Michael Carwane, pro se

This the 29<sup>th</sup> day of May 2023

# **Exhibit 1**



THE STATE OF SOUTH CAROLINA

BEFORE THE SOUTH CAROLINA  
STATE EMPLOYEE GRIEVANCE COMMITTEE

In the Matter of:

SUBPOENA

Michael Carwane,

vs.

S.C. Department of Juvenile Justice

TO: Saluda Police Department, 101 S Jefferson Street, Saluda, SC 29138

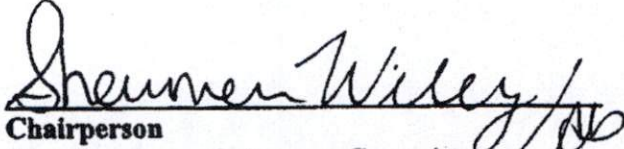
By virtue of a Writ of Subpoena to you directed, you are required to produce the following:

1. Copies of all documents regarding investigation of Saluda County DJJ and/or employee Michael Carwane to include police incident report dated September 1, 2021, complete associated body camera footage, supplemental video, employee statements, and record of SCDJJ employee contacts August 2020 to present.

To: Michael Carwane, 302 The Heights Third Avenue, Saluda, South Carolina 29138, by March 3, 2023.

Failure to observe the requirement of this subpoena may subject you to contempt proceedings.

13th day of February 2023  
Columbia, South Carolina

  
 Chairperson  
 State Employee Grievance Committee

THE STATE OF SOUTH CAROLINA

BEFORE THE SOUTH CAROLINA  
STATE EMPLOYEE GRIEVANCE COMMITTEE

In the Matter of:

SUBPOENA

Michael Carwane,

vs.

S.C. Department of Juvenile Justice

TO: Saluda County Administrator, Sandra G. Paget, 400 West Highland Street, Saluda, SC 29138, 864-445-4500 ext. 2228

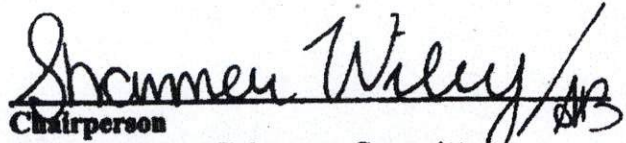
By virtue of a Writ of Subpoena to you directed, you are required to produce the following:

1. Copies of all records (to include purchase and installation invoices and SCDJJ equipment requests) for additions/changes to building video monitoring equipment from 2019 to present, in or about the county building located at 120 South Main Street, Saluda, SC 29138.
2. Copies of the recorded video footage of the building (120 South Main Street, Saluda, SC 29138) entrance/interior for the following times:
  - a. June 3, 2021 from 2:00 PM until 3:00 PM
  - b. July 15, 2021 from 8:15 AM until 9:00 AM
  - c. September 1, 2021 from 2:15 PM until 4:30 PM

To: Michael Carwane, 302 The Heights Third Avenue, Saluda, South Carolina 29138, by March 3, 2023.

Failure to observe the requirement of this subpoena may subject you to contempt proceedings.

13th day of February 2023  
Columbia, South Carolina

  
Chairperson  
State Employee Grievance Committee

THE STATE OF SOUTH CAROLINA

BEFORE THE SOUTH CAROLINA  
STATE EMPLOYEE GRIEVANCE COMMITTEE

In the Matter of:

SUBPOENA

Michael Carwane,

vs.

S.C. Department of Juvenile Justice

TO: South Carolina Department of Juvenile Justice, 220 Executive Center Drive, Columbia, SC 29210

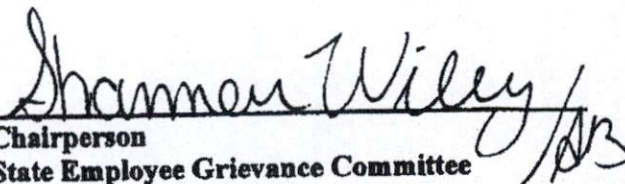
By virtue of a Writ of Subpoena to you directed, you are required to produce the following:

1. Copies of all Human Resource and supervisory files (regarding employee Michael Carwane) to include supervisory and peer statements, reports for all informal and formal complaints investigated by Human Resources and/or Inspector General, and all contacts with the State Accident Fund.

To: Michael Carwane, 302 The Heights Third Avenue, Saluda, South Carolina 29138, by March 3, 2023.

Failure to observe the requirement of this subpoena may subject you to contempt proceedings.

13th day of February 2023  
Columbia, South Carolina

  
Chairperson  
State Employee Grievance Committee

7022 0430 0001 8397 5922

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**Columbia, SC 29200**

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<input type="checkbox"/> Return Receipt (hardcopy)	\$10.80	Postmark Here
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.63	01/31/2023
Total Postage and Fees	\$4.78	

Sent To **SC055 So. Attorney Sam Bunge**  
 Street and Apt. No., or PO Box No.  
**220 Executive Center Drive**  
 City, State, ZIP+4®  
**Columbia SC 29210**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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**Lexington, SC 29071**

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Extra Services & Fees (check box, add fee as appropriate)	\$3.35	03
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	Postmark Here
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.63	01/31/2023
Total Postage and Fees	\$8.13	

Sent To **State Accident Fund**  
 Street and Apt. No., or PO Box No.  
**113 Reed Avenue**  
 City, State, ZIP+4®  
**Lexington SC 29071**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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**Columbia, SC 29201**

**OFFICIAL USE**

Certified Mail Fee	\$3.35	0138
Extra Services & Fees (check box, add fee as appropriate)	\$0.00	03
<input type="checkbox"/> Return Receipt (hardcopy)	\$10.80	Postmark Here
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.63	01/31/2023
Total Postage and Fees	\$4.78	

Sent To **Nicolas L. Hamler**  
 Street and Apt. No., or PO Box No.  
**Postoffice Box 11449 (29211)**  
 City, State, ZIP+4®  
**1310 Gordon Street Columbia, SC 29201**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7021 0950 0000 3954 7109

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**Saluda, SC 29138**

**OFFICIAL USE**

Certified Mail Fee	\$4.15	0138
Extra Services & Fees (check box, add fee as appropriate)	\$3.75	03
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	Postmark Here
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.63	01/31/2023
Total Postage and Fees	\$8.13	


Sent To **Saluda Police Department**  
 Street and Apt. No., or PO Box No.  
**101 S. Jefferson St.**  
 City, State, ZIP+4®  
**Saluda SC 29138**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

**SENDER COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
**Saluda Police Department**  
**101 S Jefferson St.**  
**Saluda SC 2938**



9590 9402 7371 2028 2250 30

2. Article Number (Transfer from service label)  
**7021 0950 0000 3954 7109**

PS Form 3811, July 2020 PSN 7530-02-000-9063 Domestic Return Receipt

---

**COMPLETE THIS SECTION FOR DELIVERY**

A. Signature  
 X *Ashley Turner*  Agent  Addressee

B. Received by (Printed Name)  
**Ashley Turner**

C. Date of Delivery  
**2-2-23**

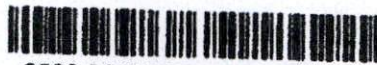
D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  
 Adult Signature  Priority Mail Express®  
 Adult Signature Restricted Delivery  Registered Mail™  
 Certified Mail®  Registered Mail Restricted Delivery  
 Certified Mail Restricted Delivery  Signature Confirmation™  
 Collect on Delivery  Signature Confirmation Restricted Delivery  
 Collect on Delivery Restricted Delivery  Signature Confirmation Restricted Delivery

**SENDER COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
**State Accident Fund**  
**113 Reed Avenue**  
**Lexington SC 29071**



9590 9402 7371 2028 2250 47

2. Article Number (Transfer from service label)  
**7021 0950 0000 3954 7116**

PS Form 3811, July 2020 PSN 7530-02-000-9063 Domestic Return Receipt

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**COMPLETE THIS SECTION FOR DELIVERY**

A. Signature  
 X *Jennifer Shull*  Agent  Addressee

B. Received by (Printed Name)  
**Jennifer Shull**

C. Date of Delivery  
**2/2/23**


D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  
 Adult Signature  Priority Mail Express®  
 Adult Signature Restricted Delivery  Registered Mail™  
 Certified Mail®  Registered Mail Restricted Delivery  
 Certified Mail Restricted Delivery  Signature Confirmation™  
 Collect on Delivery  Signature Confirmation Restricted Delivery  
 Collect on Delivery Restricted Delivery  Signature Confirmation Restricted Delivery

**SENDER COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
**RESTRICTED DELIVERY**  
**SCOTT**  
**c/o Attorney Sara Buge**  
**220 Executive Drive**  
**Columbia SC 29210**



9590 9402 3359 7227 6052 87

2. Article Number (Transfer from service label)  
**7022 0410 0001 8397 5922**

PS Form 3811, July 2020 PSN 7530-02-000-9063 Domestic Return Receipt

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**COMPLETE THIS SECTION FOR DELIVERY**

A. Signature  
 X *Am*  Agent  Addressee

B. Received by (Printed Name)  
**Am**

C. Date of Delivery  
**2-2-23**

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

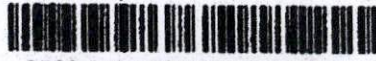
3. Service Type  
 Adult Signature  Priority Mail Express®  
 Adult Signature Restricted Delivery  Registered Mail™  
 Certified Mail®  Registered Mail Restricted Delivery  
 Certified Mail Restricted Delivery  Return Receipt for Merchandise  
 Collect on Delivery  Signature Confirmation™  
 Collect on Delivery Restricted Delivery  Signature Confirmation Restricted Delivery

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mail piece or on the front if space permits.

**RESTRICTED DELIVERY**

1. Article Addressed to:  
 Nicolas L. Haigler  
 Postoffice Box 11449 (29211)  
 1310 Gadsden Street  
 Columbia, SC 29201



9590 9402 7371 2028 2250 23

2. Article Number (Transfer from service label)  
 7021 0950 0000 3954 7093

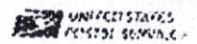
**COMPLETE THIS SECTION FOR DELIVERY**

A. Signature  Agent  
 Addressee

B. Received by (Printed Name) *Nicholas Haigler* C. Date of Delivery *4-10-23*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type
- Adult Signature
  - Adult Signature Restricted Delivery
  - Certified Mail®
  - Certified Mail Restricted Delivery
  - Collect on Delivery
  - Collect on Delivery Restricted Delivery
  - Mail Restricted Delivery
  - Priority Mail Express®
  - Registered Mail™
  - Registered Mail Restricted Delivery
  - Signature Confirmation™
  - Signature Confirmation Restricted Delivery



# Product Tracking & Reporting

## USPS Tracking Intranet Tracking Number Result

Result for Domestic Tracking Number 7021 0950 0000 3954 7093

Tracking Expires On  
January 31, 2026

Destination and Origin	
<b>Destination</b>	
292013002	COLUMBIA, SC
<b>Origin</b>	
291389998	SALUDA, SC

Tracking Number Classification	
<b>Class/Service</b>	
Class/Service:	First-Class Certified Mail
Class of Mail Code/Description:	FC / First Class
<b>Destination Address Information</b>	
Address:	1310 GADSDEN ST
City:	COLUMBIA
State:	SC
5-Digit ZIP Code:	29201
4-Digit ZIP Code add on:	3002
Delivery Point Code:	10
Record Type Code:	Street Record
Delivery Type:	Business, Other
<b>Origin / Return / Pickup Address Information</b>	
Address:	
City:	
State:	
5-Digit ZIP Code:	29138
4-Digit ZIP Code add on:	9998
<b>Service Delivery Information</b>	
Service Performance Date:	Expected Delivery by: Thursday, 02/02/2023
Delivery Option Indicator:	1 - Normal Delivery
Zone:	02
PO Box:	N
Other Information	<u>Service Calculation Information</u>
<b>Payment</b>	
Payment Type:	Other Postage
Payment Account Number:	000000000000
Postage:	\$0.63
Weight:	0 lb(s) 1.00 oz(s)
Rate Indicator:	Single Piece - Letters
<b>Other Information</b>	
Related Product:	9590 9402 7371 2028 2250 23
<u>Agent Information</u>	

803  
733  
4600

Request Internal USPS Tracking Plus Statement

Extra Services

Extra Services Details

Certified Mail	
Certified Mail Restricted Delivery	\$10.80

Events

PACKAGE RETURN NOTICE GENERATED	VS	02/18/2023	03:12	COLUMBIA, SC 29201	Customer Driven Activity		02/18/2023 03:43:24	Request Delivery Record	
2ND NOTICE GENERATED	VF	02/06/2023	03:24	COLUMBIA, SC 29201	Customer Driven Activity		02/08/2023 03:58:09		
NO AUTHORIZED RECIPIENT AVAILABLE	56	02/03/2023	15:14	COLUMBIA, SC 29201	Scanned	MDD TR C171AD0678 (interface type - wireless)	Scanned by route 9201C024	02/03/2023 14:23:07	3649 ID: 6293062370181723 GEO Location Data Available
AWAITING DELIVERY SCAN	DX	02/03/2023	00:10	COLUMBIA, SC 29201	System Generated			02/02/2023 23:23:04	
OUT FOR DELIVERY	OF	02/02/2023	06:10	COLUMBIA, SC 29201	System Generated			02/02/2023 06:27:09	
SORTING/PROCESSING COMPLETE	PC	02/02/2023	06:09	COLUMBIA, SC 29201	System Generated			02/02/2023 06:27:06	
ARRIVAL AT UNIT	07	02/02/2023	05:45	COLUMBIA, SC 292019958	Scanned	RMD 18243D8106 (interface type - wireless)	Scanned by route 04566802	02/02/2023 06:05:07	OFD Same Day
ENROUTE/PROCESSED	10	02/02/2023	01:34	COLUMBIA, SC 29201	Scanned	DIOSS-016	Destined to route 29201300210	02/02/2023 00:38:06	Container ID: 292012290112734311547112
IN TRANSIT TO NEXT FACILITY	NT	02/01/2023	18:53		System Generated			02/01/2023 18:04:06	
ENROUTE/PROCESSED	10	01/31/2023	18:53	COLUMBIA, SC 29201	Scanned	DIOSS-005	Destined to route 29201300210	01/31/2023 18:04:06	Container ID: 292012424112737311060824
ENROUTE/PROCESSED	10	01/31/2023	17:54	COLUMBIA, SC 29201	Scanned	AFC3200-002		01/31/2023 16:59:03	
DEPART POST OFFICE	SF	01/31/2023	16:10	SALUDA, SC 29138	System Generated			01/31/2023 15:28:04	Closeout Label ID: CI133056 600 2801 3115 1039 900
ACCEPT OR PICKUP	03	01/31/2023	13:00	SALUDA, SC 291389968	Scanned	RSS POS	Destined to route C049	01/31/2023 12:28:02	Facility Finance Number: 457820

Enter up to 35 items separated by commas.

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SA 29138

Certified Mail Fee	\$7.75	0138
Extra Services & Fees (check box, add fee as appropriate)	\$0.00	11
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	Postmark Here
<input type="checkbox"/> Return Receipt (electronic)	\$10.80	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.63	02/15/2023
Total Postage and Fees	\$14.78	

Sent To: **SCDJT c/o Sara Bunge**  
Street and Apt. No., or PO Box No.: **220 Executive Center Dr**  
City, State, ZIP+4®: **Columbia SC 29210**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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SA 29138

Certified Mail Fee	\$7.75	0138
Extra Services & Fees (check box, add fee as appropriate)	\$0.00	11
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	Postmark Here
<input type="checkbox"/> Return Receipt (electronic)	\$10.80	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.63	02/15/2023
Total Postage and Fees	\$14.78	

Sent To: **Saluda County Admin Sandra Padgett**  
Street and Apt. No., or PO Box No.: **400 W Highland St**  
City, State, ZIP+4®: **Saluda SC 29138**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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SA 29071

Certified Mail Fee	\$4.15	0138
Extra Services & Fees (check box, add fee as appropriate)	\$3.35	11
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	Postmark Here
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.63	02/15/2023
Total Postage and Fees	\$8.13	

Sent To: **State Accident Fund**  
Street and Apt. No., or PO Box No.: **113 Reed Ave**  
City, State, ZIP+4®: **Lexington SC 29071**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

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SA 29138

Certified Mail Fee	\$4.15	0138
Extra Services & Fees (check box, add fee as appropriate)	\$3.35	11
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	Postmark Here
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.63	02/15/2023
Total Postage and Fees	\$8.13	

Sent To: **Saluda Police Department**  
Street and Apt. No., or PO Box No.: **101 S Jefferson St**  
City, State, ZIP+4®: **Saluda SC 29138**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

Complete items 1, 2, and 3.  
 Print your name and address on the reverse so that we can return the card to you.  
 Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Saluda County Administrator,  
 Sandra G Padgett  
 400 West Highland Street  
 Saluda SC 29138



9590 9402 7538 2098 5396 89

2. Article Number (Transfer from service label)

7022 0410 0001 8398 0247

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  Addressee

*[Signature]*

B. Received by (Printed Name) C. Date of Delivery

*J. Hoare* 07/21/20

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  Priority Mail Express®  
 Adult Signature  Registered Mail™  
 Adult Signature Restricted Delivery  Registered Mail Restricted Delivery  
 Certified Mail®  Signature Confirmation™  
 Certified Mail Restricted Delivery  Signature Confirmation Restricted Delivery  
 Collect on Delivery  Signature Confirmation Restricted Delivery  
 Collect on Delivery Restricted Delivery  
 Insured Mail  Registered Mail Restricted Delivery (over \$500)

PS Form 3811, July 2020 PSN 7530-02-000-8063 Domestic Return Receipt

**SENDER: COMPLETE THIS SECTION**

Complete items 1, 2, and 3.  
 Print your name and address on the reverse so that we can return the card to you.  
 Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Saluda Police Department  
 101 S Jefferson Street  
 Saluda SC 29138



9590 9402 7538 2098 5396 41

2. Article Number (Transfer from service label)

7022 0410 0001 8398 0261

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  Addressee

*[Signature]*

B. Received by (Printed Name) C. Date of Delivery

*Ashey Turner* 7/21

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  Priority Mail Express®  
 Adult Signature  Registered Mail™  
 Adult Signature Restricted Delivery  Registered Mail Restricted Delivery  
 Certified Mail®  Signature Confirmation™  
 Certified Mail Restricted Delivery  Signature Confirmation Restricted Delivery  
 Collect on Delivery  Signature Confirmation Restricted Delivery  
 Collect on Delivery Restricted Delivery  
 Insured Mail  Registered Mail Restricted Delivery (over \$500)


PS Form 3811, July 2020 PSN 7530-02-000-8063 Domestic Return Receipt

**SENDER: COMPLETE THIS SECTION**

Complete items 1, 2, and 3.  
 Print your name and address on the reverse so that we can return the card to you.  
 Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

State Accident Fund  
 113 Reed Avenue  
 Lexington, SC 29071



9590 9402 7538 2098 5396 58

2. Article Number (Transfer from service label)

7022 0410 0001 8398 027A

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  Addressee

*[Signature]*

B. Received by (Printed Name) C. Date of Delivery

*Shirley Mark* 7-17-23

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  Priority Mail Express®  
 Adult Signature  Registered Mail™  
 Adult Signature Restricted Delivery  Registered Mail Restricted Delivery  
 Certified Mail®  Signature Confirmation™  
 Certified Mail Restricted Delivery  Signature Confirmation Restricted Delivery  
 Collect on Delivery  Signature Confirmation Restricted Delivery  
 Collect on Delivery Restricted Delivery  
 Insured Mail  Registered Mail Restricted Delivery (over \$500)

Michael Carwane  
302 The Heights Third Ave  
Saluda SC 29138

**CERTIFIED MAIL**



7022 0410 0001 8398 0254



RDC 88



29210

U.S. POSTAGE  
FIRST CLASS PERMIT NO. 100  
SALUDA, SC  
29138  
FEB 15, 23  
AMOUNT  
**\$14.7**  
R2304N117716

**RESTRICTED DELIVERY** - Sara Bunge

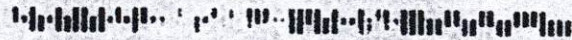
SCDJT  
% Attorney Sara Bunge  
220 E -R-T-S-  
Columbia

Refused

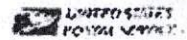
292104370-1N 009 04/07/23

RETURN TO SENDER  
UNABLE TO FORWARD  
UNABLE TO FORWARD  
RETURN TO SENDER

29210-842



251



# Product Tracking & Reporting

## USPS Tracking Intranet Tracking Number Result

Result for Domestic Tracking Number 7022 0410 0001 8398 0254

Tracking Expires On  
February 15, 2025

Destination and Origin	
<b>Destination</b>	
292108420	COLUMBIA, SC
<b>Origin</b>	
291388998	SALUDA, SC

Tracking Number Classification	
<b>Class/Service</b>	
Class/Service:	First-Class Certified Mail
Class of Mail Code/Description:	FC / First Class
<b>Destination Address Information</b>	
Address:	220 EXECUTIVE CENTER DR
City:	COLUMBIA
State:	SC
5-Digit ZIP Code:	29210
4-Digit ZIP Code add on:	8420
Delivery Point Code:	98
Record Type Code:	Building/Apartment
<b>Origin / Return / Pickup Address Information</b>	
Address:	
City:	
State:	
5-Digit ZIP Code:	29138
4-Digit ZIP Code add on:	9998
<b>Service Delivery Information</b>	
Service Performance Date:	Expected Delivery by: Friday, 02/17/2023
Delivery Option Indicator:	1 - Normal Delivery
Zone:	01
PO Box:	N
Other Information:	<u>Service Calculation Information</u>
<b>Payment</b>	
Payment Type:	Other Postage
Payment Account Number:	000000000000
Postage:	\$0.63
Weight:	0 lb(s) 1.00 oz(s)
Rate Indicator:	Single Piece - Letters
<b>Other Information</b>	
Related Product:	9500 9402 7538 2098 5396 72
<b>Agent Information</b>	
<u>Request Internal USPS Tracking Plus Statement</u>	

803  
772  
780M

Extra Services

Extra Services Details

Certified Mail

Certified Mail Restricted Delivery \$10.00

Events

REFUSED	04	02/23/2023	08:06	COLUMBIA, SC 29210	Scanned	IMD 18246D8137 (interface type - wireless)	Scanned by route 00000000	02/23/2023 07:10:05	Request Delivery Record
2ND NOTICE GENERATED	VF	02/22/2023	03:16	COLUMBIA, SC 29210	Customer Driven Activity			02/22/2023 03:58:12	
AVAILABLE FOR PICKUP	14	02/17/2023	09:45	COLUMBIA, SC 29221	Scanned	MIO 15170D835D (interface type - wireless)	Scanned by route 01234567	02/17/2023 05:57:07	
ARRIVAL AT UNIT	07	02/17/2023	09:45	COLUMBIA, SC 292109098	Scanned	MIO 15170D835D (interface type - wireless)	Scanned by route 01234567	02/17/2023 08:57:10	PC / OF Reason Code OFD Same Day
OUT FOR DELIVERY	0F	02/17/2023	08:46	COLUMBIA, SC 29210	System Generated			02/17/2023 07:52:08	
SORTING/PROCESSING COMPLETE	PC	02/17/2023	08:36	COLUMBIA, SC 29210	System Generated			02/17/2023 07:52:08	
ARRIVAL AT UNIT	07	02/17/2023	08:35	COLUMBIA, SC 292109098	Scanned	IMD 18322D80A7 (interface type - wireless)	Scanned by route 00000000	02/17/2023 07:52:04	OFD Same Day
ENROUTE/PROCESSED	10	02/16/2023	23:40	COLUMBIA, SC 29201	Scanned	DBCS-013	Destined to route 29210842099	02/16/2023 22:47:05	
IN TRANSIT TO NEXT FACILITY	NT	02/16/2023	18:02		System Generated			02/16/2023 17:17:02	
ENROUTE/PROCESSED	10	02/15/2023	20:02	COLUMBIA, SC 29201	Scanned	DIOSS-005	Destined to route 29210842099	02/15/2023 19:18:07	
ENROUTE/PROCESSED	10	02/15/2023	19:10	COLUMBIA, SC 29201	Scanned	AFC8200-003		02/15/2023 18:27:04	
ENROUTE/PROCESSED	10	02/15/2023	18:09	COLUMBIA, SC 29201	Scanned	AFC8200-003		02/15/2023 18:27:04	
DEPART POST OFFICE	SF	02/15/2023	16:17	SALUDA, SC 29138	System Generated			02/15/2023 16:14:07	Crossout Label ID: CT13805650002302 15180102000
ACCEPT OR PICKUP	03	02/15/2023	12:54	SALUDA, SC 291389998	Scanned	RSS POS	Destined to route C063	02/15/2023 12:29:04	Facility Finance Number: 457820

Enter up to 35 items separated by commas.

Select Search Type

Quick Search

Submit

Product Tracking & Reporting, All Rights Reserved

Version: 23.2.2.0.35

Called Mar 14<sup>th</sup> Dutch Fork office

7022 0410 0001 8398 0650

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

Saluda, SC 29138

**OFFICIAL USE**

Certified Mail Fee	\$4.15	0138
Extra Services & Fees (check box, add fee as appropriate)	\$3.35	11
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$10.80	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.63	
Total Postage and Fees	\$14.78	03/08/2023

Sent To: **Saluda County Administrator**  
 Street and Apt. No., or PO Box No.: **400 W. Highway 200 Sandra Padgett**  
 City, State, ZIP+4®: **Saluda SC 29138**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7022 0410 0001 8398 0421

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

Columbia, SC 29201

**OFFICIAL USE**

Certified Mail Fee	\$4.15	0138
Extra Services & Fees (check box, add fee as appropriate)	\$7.75	11
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.63	
Total Postage and Fees	\$8.13	03/08/2023

Sent To: **Attorney Gene Matthews**  
 Street and Apt. No., or PO Box No.: **1900 Barnwell St**  
 City, State, ZIP+4®: **Columbia SC 29201**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7022 0410 0001 8398 0444

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

Lexington, SC 29071

**OFFICIAL USE**

Certified Mail Fee	\$4.15	0138
Extra Services & Fees (check box, add fee as appropriate)	\$3.35	11
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.63	
Total Postage and Fees	\$8.13	03/08/2023

Sent To: **State Accident Fund**  
 Street and Apt. No., or PO Box No.: **113 Reed Ave**  
 City, State, ZIP+4®: **Lexington SC 29071**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7022 0410 0001 8398 0421

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

Saluda, SC 29138


**OFFICIAL USE**


Certified Mail Fee	\$4.15	0138
Extra Services & Fees (check box, add fee as appropriate)	\$7.75	11
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.63	
Total Postage and Fees	\$8.13	03/08/2023


Sent To: **Saluda Police Department**  
 Street and Apt. No., or PO Box No.: **1015 Jefferson St**  
 City, State, ZIP+4®: **Saluda SC 29138**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION IN DELIVERY																
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <b>8 MAR 2023/PM 21</b>  <input checked="" type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p>																
<p>1. Article Addressed to:</p> <p><b>Saluda Police Department  1015 Jefferson St  Saluda SC 29138</b></p>  <p>9590 9402 7538 2098 5398 49</p>	<p>B. Received by (Printed Name) <b>M. C. Williams</b> C. Date of Delivery <b>3-11-23</b></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p>																
<p>2. Article Number (Transfer from service label)  <b>7022 0410 0001 8398 0452</b></p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Restricted Delivery																
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Insured Mail Restricted Delivery (500)																	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9000</p>	<p>Domestic Return Receipt</p>																

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION IN DELIVERY																
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <b>Sandra Padgett</b> <input checked="" type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p>																
<p>1. Article Addressed to:</p> <p><b>Saluda County Administrator  40 Sandra Padgett  400 W Highland St.  Saluda SC 29138</b></p>  <p>9590 9402 7538 2098 5398 32</p>	<p>B. Received by (Printed Name) <b>Sandra Padgett</b> C. Date of Delivery <b>03-10-23</b></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p> <p><b>RESTRICTED DELIVERY</b></p>																
<p>2. Article Number (Transfer from service label)  <b>7022 0410 0001 8398 0650</b></p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Restricted Delivery																
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Insured Mail Restricted Delivery (500)																	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9003</p>	<p>Domestic Return Receipt</p>																

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  <input checked="" type="checkbox"/> <i>E. J. Jh</i> <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p>																
<p>1. Article Addressed to:</p> <p>State Accident Fund  113 Reed Ave  Lexington SC 29071</p>	<p>B. Received by (Printed Name) <i>Erin Fady</i> C. Date of Delivery <i>3/13/23</i></p>																
 9590 9402 7538 2098 5398 25	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p>																
<p>Article Number (Transfer from outside label)  7022 0410 0001 8398 0445</p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery		<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Collect on Delivery Restricted Delivery																	
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																	
PS Form 3811, July 2020 PSN 7630-02-000-9063	Domestic Return Receipt																

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  <input checked="" type="checkbox"/> <i>John Wallace</i> <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p>																
<p>1. Article Addressed to:</p> <p>Attorney Gene Matthews  1900 Barnwell St  Columbia SC 29201</p>	<p>B. Received by (Printed Name) <i>Joshua Wallace</i> C. Date of Delivery <i>3/10/23</i></p>																
 9590 9402 7538 2098 5398 18	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p>																
<p>Article Number (Transfer from outside label)  7022 0410 0001 8398 0421</p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery		<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Collect on Delivery Restricted Delivery																	
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																	
PS Form 3811, July 2020 PSN 7630-02-000-9063	Domestic Return Receipt																

7022 0410 0001 6398 1923

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**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

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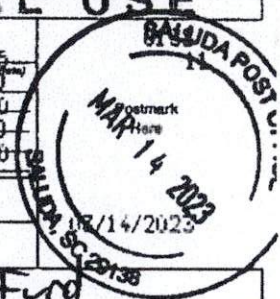
**OFFICIAL USE**

Lexington SC 29071

Certified Mail Fee	\$4.15
Extra Services & Fees (check box, add fee as appropriate)	\$7.75
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.63
Total Postage and Fees	\$8.13

Sent To: **State Accident Fund**  
 Street and Apt. No., or PO Box No.: **113 Reed Avenue**  
 City, State, ZIP+4®: **Lexington SC 29071**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions



7022 0410 0001 6398 0711

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**OFFICIAL USE**

Columbia SC 29214

Certified Mail Fee	\$4.15
Extra Services & Fees (check box, add fee as appropriate)	\$3.25
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$1.74
Total Postage and Fees	\$9.24

Sent To: **South Carolina Department of Juvenile Justice**  
 Street and Apt. No., or PO Box No.: **220 Executive Center Drive**  
 City, State, ZIP+4®: **Columbia SC 29210**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

0138  
 11  
 Postmark Here  
 04/10/2023

7022 0410 0001 6398 1916

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For delivery information, visit our website at [www.usps.com](http://www.usps.com)

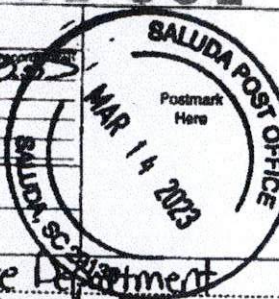
**OFFICIAL USE**

Saluda SC 29138

Certified Mail Fee	\$4.15
Extra Services & Fees (check box, add fee as appropriate)	\$3.25
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.63
Total Postage and Fees	\$8.13

Sent To: **Saluda Police Department**  
 Street and Apt. No., or PO Box No.: **101 Jefferson St**  
 City, State, ZIP+4®: **Saluda SC 29138**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions



7022 0410 0001 6398 1909

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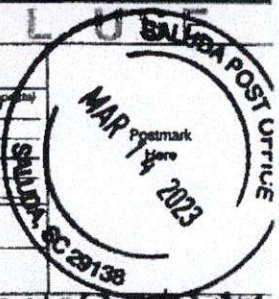
**OFFICIAL USE**


Columbia SC 29210


Certified Mail Fee	\$4.15
Extra Services & Fees (check box, add fee as appropriate)	\$3.25
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.63
Total Postage and Fees	\$8.13

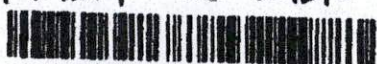
Sent To: **South Carolina Department of Juvenile Justice**  
 Street and Apt. No., or PO Box No.: **220 Executive Center Drive**  
 City, State, ZIP+4®: **Columbia SC 29210**


PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p><i>Jennifer Shull</i></p>	
<p>1. Article Addressed to:</p> <p>State Accident Fund 113 Reed Avenue Lexington, SC 29071</p>  <p>9590 9402 7538 2098 5399 62</p>	<p>B. Received by (Printed Name)</p> <p>Jennifer Shull</p>	<p>C. Date of Delivery</p> <p>03-16-23</p>
	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7022 0410 0001 8398 1923</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p><i>[Signature]</i></p>	
<p>1. Article Addressed to:</p> <p>South Carolina Department of Juvenile Justice Legal Office 220 Executive Center Drive Columbia SC 29210</p>  <p>9590 9402 7538 2098 5397 57</p>	<p>B. Received by (Printed Name)</p> <p>[Signature]</p>	<p>C. Date of Delivery</p> <p>4-13-23</p>
	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7022 0410 0001 8398 0711</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p>
<p>1. Article Addressed to:</p> <p>South Carolina Department of Juvenile Justice Legal Office 220 Executive Center Drive Columbia SC 29210</p>  <p>9590 9402 7538 2098 5399 86</p>	<p>B. Received by (Printed Name) <input type="checkbox"/> C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>2. Article Number (Transfer from service label)</p> <p>7022 0410 0001 8398 1909</p>	<p>3. Service Type</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Adult Signature</li> <li><input type="checkbox"/> Adult Signature Restricted Delivery</li> <li><input type="checkbox"/> Certified Mail®</li> <li><input type="checkbox"/> Certified Mail Restricted Delivery</li> <li><input type="checkbox"/> Collect on Delivery</li> <li><input type="checkbox"/> Collect on Delivery Restricted Delivery</li> <li><input type="checkbox"/> Insured Mail</li> <li><input type="checkbox"/> Insured Mail Restricted Delivery (per \$500)</li> <li><input type="checkbox"/> Priority Mail Express®</li> <li><input type="checkbox"/> Registered Mail™</li> <li><input type="checkbox"/> Registered Mail Restricted Delivery</li> <li><input type="checkbox"/> Signature Confirmation™</li> <li><input type="checkbox"/> Signature Confirmation Restricted Delivery</li> </ul>
<p>PS Form 3811, July 2020 PSN 7530-02-000-9063 <span style="float: right;">Domestic Return Receipt</span></p>	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p>
<p>1. Article Addressed to:</p> <p>Saluda Police Department 101 S Jefferson St Saluda SC 29138</p>  <p>9590 9402 7538 2098 5399 79</p>	<p>B. Received by (Printed Name) <input type="checkbox"/> C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>2. Article Number (Transfer from service label)</p> <p>7022 0410 0001 8398 1916</p>	<p>3. Service Type</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Adult Signature</li> <li><input type="checkbox"/> Adult Signature Restricted Delivery</li> <li><input type="checkbox"/> Certified Mail®</li> <li><input type="checkbox"/> Certified Mail Restricted Delivery</li> <li><input type="checkbox"/> Collect on Delivery</li> <li><input type="checkbox"/> Collect on Delivery Restricted Delivery</li> <li><input type="checkbox"/> Insured Mail</li> <li><input type="checkbox"/> Insured Mail Restricted Delivery (per \$500)</li> <li><input type="checkbox"/> Priority Mail Express®</li> <li><input type="checkbox"/> Registered Mail™</li> <li><input type="checkbox"/> Registered Mail Restricted Delivery</li> <li><input type="checkbox"/> Signature Confirmation™</li> <li><input type="checkbox"/> Signature Confirmation Restricted Delivery</li> </ul>
<p>PS Form 3811, July 2020 PSN 7530-02-000-9063 <span style="float: right;">Domestic Return Receipt</span></p>	

# Exhibit 2

RE: Michael Carwane v. DJJ 23a0111-IJ (IMAN-CLIENTS.FID422877)

mcarwane@yahoo.../Inbox

Apr 13 at 7:41 AM

NH Nick Haigler <nhaigler@robinsongray.com>  
To: Erika S. Easler <eeasler@scalcn.net>, Ginny Bozeman <gbozeman@popelynn.com>  
Cc: holmes@townofsaluda.com <holmes@townofsaluda.com>,  
gmatthews@richardsonplowden.com <gmatthews@richardsonplowden.com>,  
lglover@saf.sc.gov <lglover@saf.sc.gov>, EFARTHING@SAF.SC.GOV <efarthing@saf.sc.gov>,  
Edwin Martin <emartin@saf.sc.gov> more...

Good morning Erika:

I am going to represent the State Accident Fund in this matter. It is my understanding that Gene Matthews, who is also copied on this email, will appear to defend DJJ. I also plan to file a response when I return from vacation. Regarding the dates, I have conflicting Hearings before the Workers' Compensation Commission on those dates. Is it possible to secure additional dates?

Nick



425 Jackson Street • Columbia, SC

NICK HAIGLER MEMBER

DIRECT: 803.231.7847

VCARD VIEW BIO  
ROBINSONGRAY.COM

2151 Pickens Street  
Suite 500  
PO Box 11449 (29211)  
Columbia SC 29201

WEBSITE: www.rgsc.com



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From: Erika S. Easler <eeasler@scalcn.net>  
Sent: Wednesday, April 12, 2023 9:39 AM  
To: Ginny Bozeman <gbozeman@popelynn.com>  
Cc: holmes@townofsaluda.com; gmatthews@richardsonplowden.com; lglover@saf.sc.gov; EFARTHING@SAF.SC.GOV; Edwin Martin <emartin@saf.sc.gov>; David Edwards <dedwards@saf.sc.gov>; mcarwane@yahoo.com; Nick Haigler <nhaigler@robinsongray.com>  
Subject: RE: Michael Carwane v. DJJ 23a0111-IJ

Great, thank you for your response!

Thank you.

Erika

From: Ginny Bozeman <gbozeman@popelynn.com>  
Sent: Tuesday, April 11, 2023 6:02 PM  
To: Erika S. Easler <eeasler@scalcn.net>  
Cc: holmes@townofsaluda.com; gmatthews@richardsonplowden.com; lglover@saf.sc.gov; EFARTHING@SAF.SC.GOV; Edwin Martin <emartin@saf.sc.gov>; David Edwards <dedwards@saf.sc.gov>; mcarwane@yahoo.com; Nick Haigler <nhaigler@robinsongray.com>  
Subject: RE: Michael Carwane v. DJJ 23a0111-IJ

Ms. Easler,

Saluda County has responded to the subpoena twice. It does not have any responsive materials. Nothing has been withheld. I will file a response to the motion to compel this week and attach the responses sent to Mr. Carwane as exhibits.

If it is necessary to hold a hearing on the motion, I am available either date.

Have a great night,

Ginny Bozeman  
OF COUNSEL

DIRECT: (803) 354-4947  
CELL: (901) 299-0667  
FAX: (803) 354-4899

popelynn.com



1411 Gervais St.  
Suite 100

Columbia, SC 29201

From: Erika S. Easler <eeasler@scalc.net>  
Sent: Monday, April 10, 2023 3:30 PM  
To: Nick Haigler <nhaigler@robinsongray.com>  
Cc: Ginny Bozeman <gbozeman@poppeflynn.com>; holmes@townofsaluda.com; gmatthews@richardsonlowden.com; lglover@saf.sc.gov; EFARTHING@SAF.SC.GOV; Edwin Martin <emartin@saf.sc.gov>; David Edwards <dedwards@saf.sc.gov>; mcarwane@yahoo.com  
Subject: RE: Michael Carwane v. DJJ 23a0111-U

Mr. Haigler,

Good afternoon!

Thank you for your email. It is my understanding that Mr. Carwane has multiple open cases.

However, to clarify, the specific issue before Judge Lenski is a Motion to Compel filed by Mr. Carwane (Petitioner), requesting the court enforce subpoenas from the South Carolina State Employee Grievance Committee issued to the Saluda County Administrator, the Saluda Police Department, the SC Department of Juvenile Justice, and the State Accident Fund.

If any of the named entities did respond or comply with the subpoenas, please file something letting the court know. Or if the parties prefer to resolve this case at a hearing, I can schedule a hearing for Wednesday, May 17, 2023 or Thursday, May 18, 2023.

Thank you.

Erika

From: Nick Haigler <nhaigler@robinsongray.com>  
Sent: Monday, April 10, 2023 11:53 AM  
To: Erika S. Easler <eeasler@scalc.net>  
Cc: gbozeman@poppeflynn.com; holmes@townofsaluda.com; gmatthews@richardsonlowden.com; lglover@saf.sc.gov; EFARTHING@SAF.SC.GOV; Edwin Martin <emartin@saf.sc.gov>; David Edwards <dedwards@saf.sc.gov>; mcarwane@yahoo.com  
Subject: RE: Michael Carwane v. DJJ 23a0111-U  
Importance: High

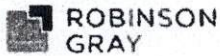
Good morning Erika:

By way of introduction I represent the State Accident Fund and Department of Juvenile Justice the a workers' compensation claim filed by Mr. Carwane. I wanted to provide a bit of background in hopes of possibly streamlining some of the issues involved here. First, Mr. Carwane served subpoenas to both the SAF and DJJ in February requesting certain documents. Those subpoenas are identical to those attached to this email, although they were served on the Form 27 subpoena (WC Form). As counsel in the WC claim I responded to both subpoenas separately. Mr. Carwane was not satisfied these responses were complete and as such decide to file a Motion to compel each to provide complete responses. Commissioner Cindy Dooley, by way of an Order issued in March, granted his Motion and requested that we provide a privilege log of any information not being provided in response to the subpoenas. The privilege log was provided to Mr. Carwane on Thursday, April 6th.

As such, as it pertains to the subpoenas served on the SAF and DJJ pursuant to the Workers' Comp Act, and as it pertains to the identical subpoenas contained in the attachment, a complete response has been served on Mr. Carwane. I am not sure whether Mr. Carwane will acknowledge this information as accurate, but he is copied on this email in case he wishes to do so. Inasmuch as he wishes to continue to litigate these issues before the Administrative Law Judge, we assert his pursuit would be frivolous in nature.

If you have any questions, or need clarification in any way, I can be reached directly at 803-231-7847.

Thanks - Nick



Integrating Dispute Resolution

NICK HAIGLER MEMBER

DIRECT 803.231.7847

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Suite 500  
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Columbia, SC 29201

MERITAS

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From: Erika S. Easler <eeasler@scalc.net>

Sent: Tuesday, April 4, 2023 1:21 PM

To: gbozeman@popeliv.com; holmes@townofsaluda.com; Gene Matthews <gmatthews@richardsonlowden.com>; Lisa Glover <lglover@saf.sc.gov>  
Subject: Michael Carwane v. DJJ 23a0111-U

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Ladies and Gentlemen,

Good afternoon!

The above referenced case, a petition for injunctive relief/enforcement, has been assigned to Judge Lenski.

The Petitioner in this case has filed Motions to Compel the Saluda County Administrator, the Saluda Police Department, the South Carolina Department of Juvenile Justice, and the State Accident Fund, with the court.

Please let me know any dates in May and June 2023 you are NOT available for a hearing in this case.

Thank you.

V/R,

Erika S. Easler  
Judicial Law Clerk to the Honorable S. Phillip Lenski  
South Carolina Administrative Law Court  
1205 Pendleton Street, Suite 224  
Columbia, S.C. 29201

Any views or opinions expressed in this email are those of the author and do not necessarily represent those of the SC Administrative Law Court.

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# Exhibit 3

Mar 30, 2021

- Email from Michael to Mr. Perez includes submission of Formal Complaint #2 with description of continued bullying, retaliation, inclusion of outside law enforcement, and plea for help.
- Although the outcome of the Formal Complaint #2 was founded, the outcome did not address Michael's request for protection from the harm.
- Ms. Callaham could not use concerns about safety in the office as a plausible excuse since they did not extend that to all members of the office, i.e. unequal treatment.

**[EXTERNAL] FW: ISO Michael Carwane Formal Complaint**

**Michael R. Carwane** <MichaelRCarwane@djj.sc.gov>

Tue 3/30/2021 2:52 PM

To: **Michael Robert Carwane** <mcarwane@troy.edu>; mcarwane@yahoo.com <mcarwane@yahoo.com>

1 attachments (45 KB)

Michael Carwane complaint Mar 2021.doc;

**From:** Michael R. Carwane


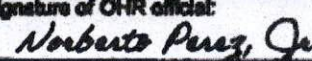
**Sent:** Tuesday, March 30, 2021 2:45 PM

**To:** Norberto Perez Jr. <NorbertoPerez@djj.sc.gov>; Amahl W. Bennett <AmahlWBennett@djj.sc.gov>

**Subject:** ISO Michael Carwane Formal Complaint

Mr. Perez, I was involved in an incident today that again irrefutably shows me that I continue to be subject to the Bullying and Retaliation of my direct Supervisor, Sandra Callaham. The unsafe and unprofessional nature of her inclusion of law enforcement and other professionals (whom I must continue to work with as a routine part of my job expectations) mandates that I respond with another formal complaint at this time. Please see attachment and take immediate action to protect me from this harm. ISO Michael Carwane 803-430-3522

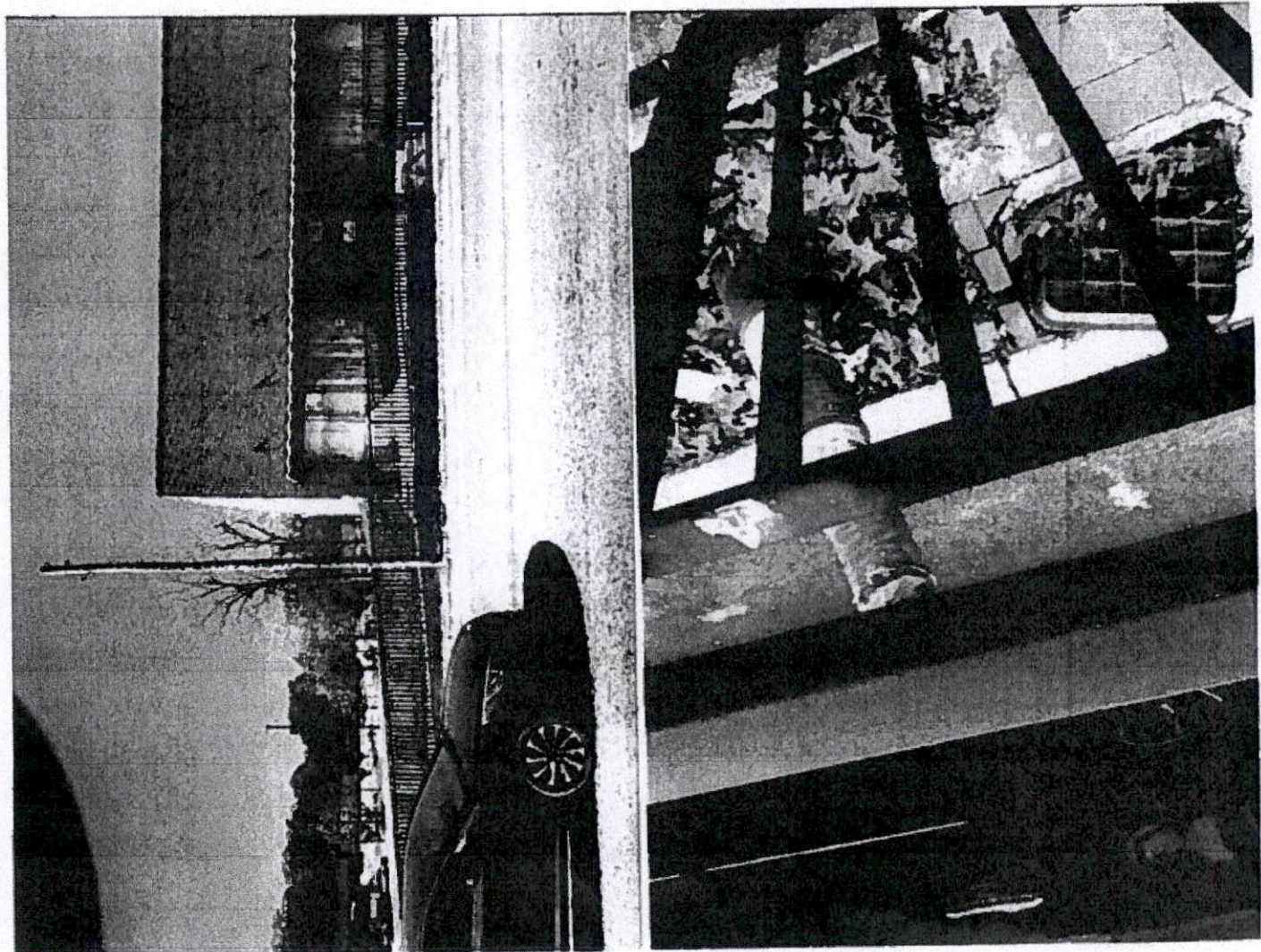
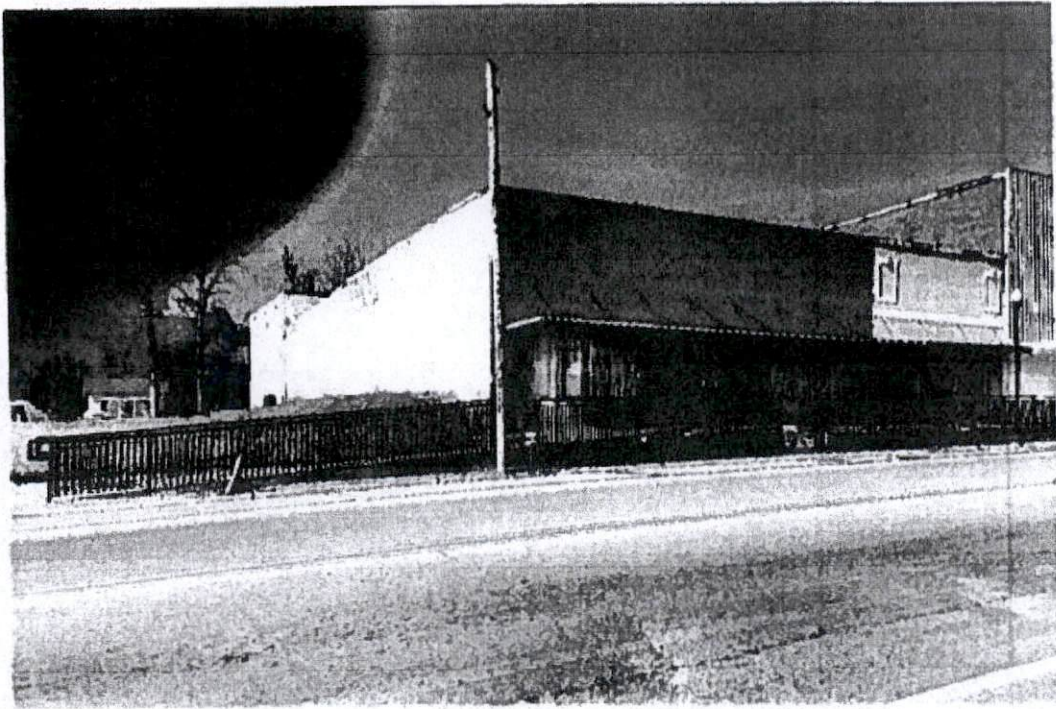
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SOUTH CAROLINA DEPARTMENT OF JUVENILE JUSTICE	
<b>Employee Complaint Form</b> (Please type or print all information)	
Employee Name: Michael Carwans	Office/Facility: Tri-County DJJ
Position Title: ISO	Name of Immediate Supervisor: Sandra Callahan
Employee Work Phone #: 803-430-3622	
<p><b>Statement of Complaint:</b> (Be specific—sexual harassment, discrimination)</p> <p>ISO filed a formal complaint for bullying, criminal behavior, and unequal work practices regarding supervisor S. Callahan in August 2020. ISO did not receive protection from retaliation by the employer, during and subsequent to that investigation/complaint. ISO filed retaliation specific to improper contact of law enforcement on behalf of Mrs. Callahan and/or someone at her request. I have been told by Human Resources that I am not the subject of an investigation, and mediation is being offered as an opportunity for me to resolve this issue alone with Mrs. Callahan. I discovered today that the Bailiff at the Edgefield court house, by order of Sonny, the Clerk of Court is denying admittance to the building for ISO Michael Carwans, without further explanation. This is another clear example of Retaliatory conduct by Mrs. Callahan, with law enforcement as her tool for such unjust harassment and continued bullying.</p>	
Name of Person(s) Accused of Wrongdoing: Sandra Callahan	Date and Time of Incident(s): March 30, 2021
Name(s) of Witnesses: Johnnie Mae Herbert, Edgefield Clerk of Court Sonny, Edgefield Court Bailiff	
<p><b>Description of Incident:</b> [Describe actions of all person(s) involved, including yourself. Use additional sheets if required.]</p> <p>I was working at home today, when I was contacted by my co-worker Johnnie Mae Herbert, asking for assistance with setting up a GPS for a juvenile this afternoon. Mrs. Herbert asked if ISO had work in Edgefield today, as she was travelling to the courthouse for an 1145 AM court hearing. ISO agreed to travel with Mrs. Herbert to assist with the GPS setup and then travelled to Edgefield with JM Herbert, by state vehicle. ISO dropped off JM Herbert, after discussing a plan to complete a home visit in Edgefield while JM Herbert had court, then join her at the court house after the hearing to log in the GPS with the family input. Upon arrival at the courthouse, the court Edgefield Bailiff answered the knock by ISO at the court house building door. The Bailiff had in hand the thermometer to do a routine temperature check for COVID prior to admittance. Upon realizing who I was (I had ID badge and identified myself) the Bailiff raised both hands and stated that I was not allowed in the building, and would have to wait outside. I was not temperature tested, and COVID was not cited as explanation. I was told that JM Herbert would be informed that I had come to see her. I informed the Bailiff that JM Herbert knew I was there because I had travelled with her and had planned with her to work with the family to set up a GPS after the court hearing. I waited outside as ordered. The Bailiff returned to the reception desk, and appeared to immediately look for a phone contact, and walked to the far end of the hall to make a phone call. Within a few minutes ISO received a phone call from JM Herbert stating that the Bailiff spoke with her, stating that I was outside looking for her, but that the Clerk of Court, Sonny had announced that ISO Michael Carwans was to be denied entry into the Edgefield Court Building. When JM Herbert asked the Bailiff for explanation, there was none given. JM stated that she would finish working with the family alone, and then join ISO in the parking lot. I agreed. ISO immediately contacted Regional Administrator, Arnold Bennett, asking for a return call to discuss the incident, as he is in my chain of command and has been previously involved in my complaint regarding Mrs. Callahan utilizing the law enforcement community to continue to bully and Retaliate against my filing an initial complaint against her. I continue to expect any employer to protect me from these behaviors within the expectations of the Policy for employee conduct, Bullying, and Harassment. I do not feel safe from these ongoing behavior, or the limited responses chosen to this date, as utilizing the law enforcement community as a tool for bullying is inherently unsafe for me as a citizen, employee, and a person. Please intervene now, and give me the peace that may come from being informed about what steps are taken to protect me from further harm. I am willing to discuss this topic more fully as it may contribute to the investigation of any additional facts needed to determine the Truth.</p>	
<p><b>Requested Action:</b> (check one)</p> <p><input type="checkbox"/> No action requested at this time. Retain complaint on file.</p> <p><input type="checkbox"/> An informal review/investigation of this complaint.</p> <p><input checked="" type="checkbox"/> A formal review/investigation of this complaint.</p>	
Signature of Employee: 	Date: Apr 6, 2021 (date of original submission Mar 30, 2021)
Printed name of OHR official: Norberto Perez, Jr.	Signature of OHR official: 
	Date received (print or stamp): 4/6/2021

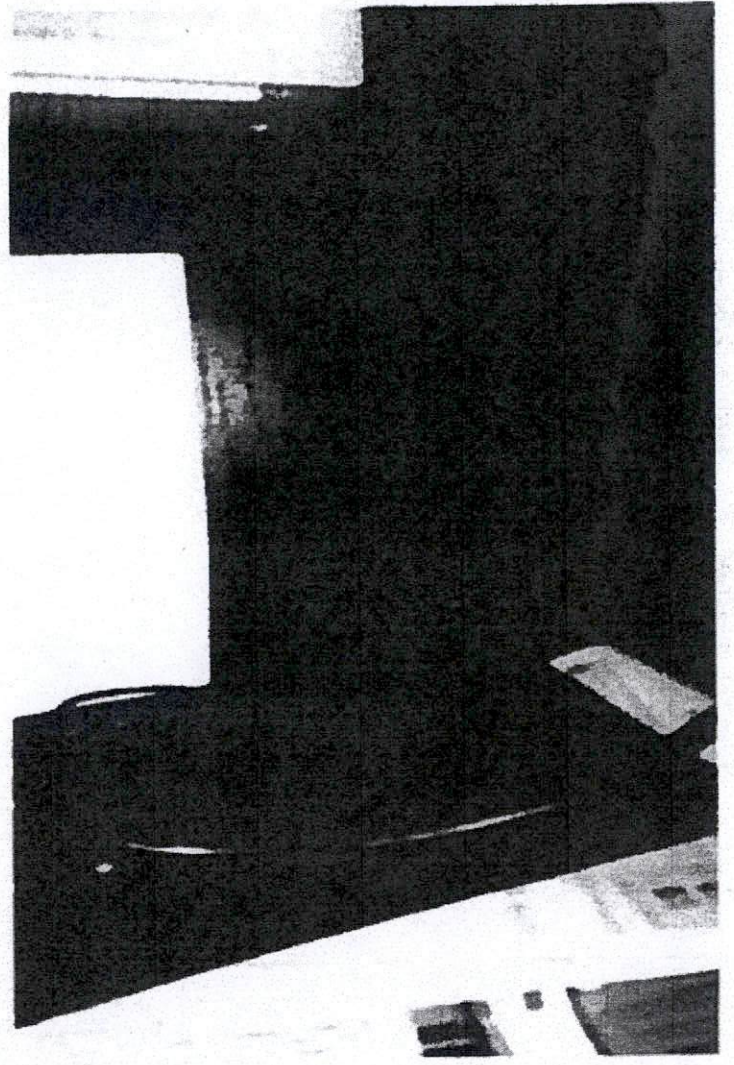
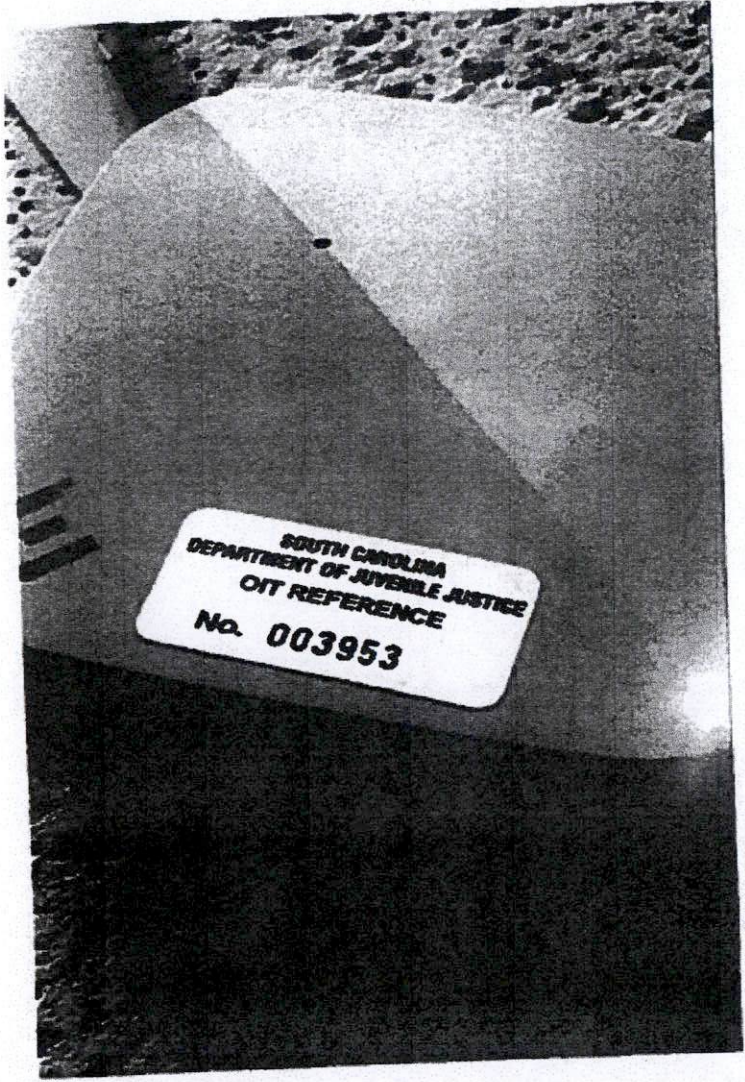
The South Carolina Department of Juvenile Justice is an equal opportunity employer. DJJ does not discriminate in hiring, promotion, discharge, pay, fringe benefits, job training, classification, recall or in any other aspects of employment, on the basis of race, color, religion, sex, participation in protected activity in the workplace, disability, age or national origin. Any act you feel is in violation please contact the Office of Human Resources, 2027 Wilbur Lane, 4903 Broad River Road, Columbia, SC 29213-6413 (803) 895-4753. The South Carolina Department of Juvenile Justice's School District also does not discriminate in any programs or activities on the basis of race, color, national origin, sex, religion, participation in protected activity in the work place, disability or age. The following offices have been designated to handle inquiries regarding the school district's nondiscrimination policies: Title IX - Inspector General's Office - 2020 Broad River Road, Columbia, SC 29210-4427 - Ph: 803-895-4852; 604 Special Education Office, 1830 Shreve Road, Columbia, SC 29210-6116 - Ph: 803-895-6194.

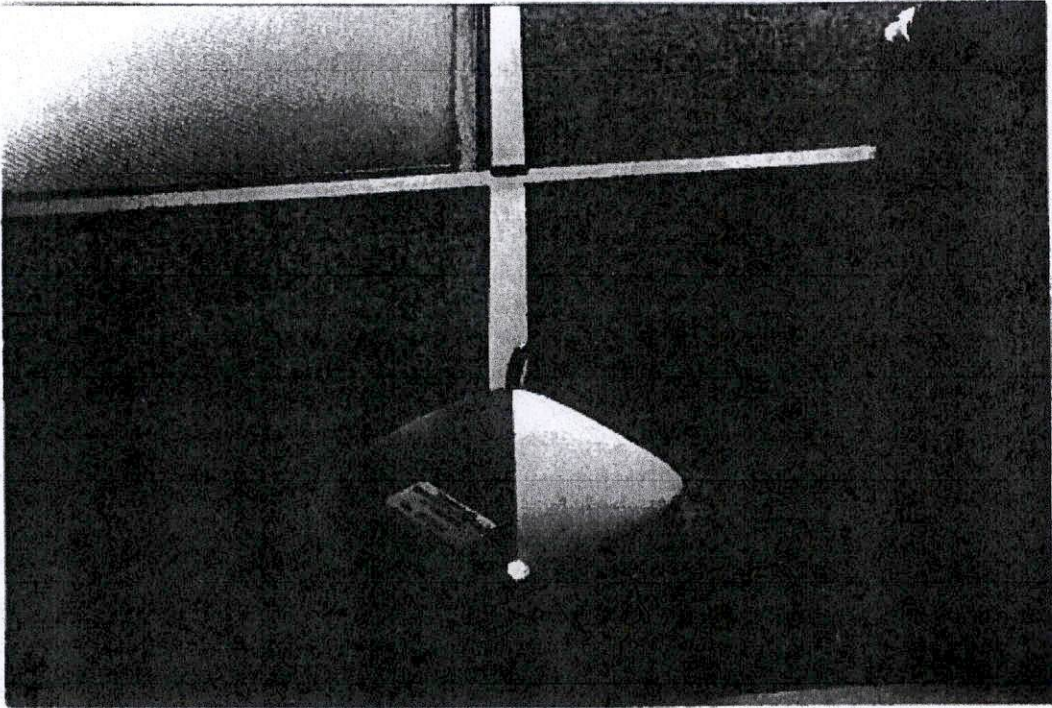
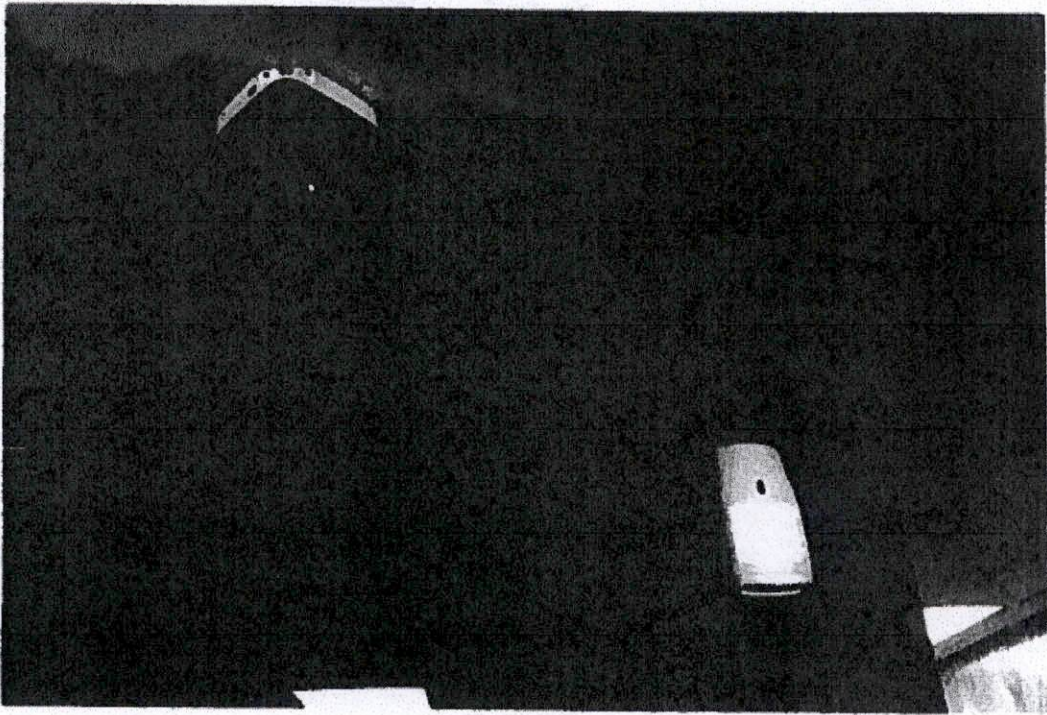
Form B-OC  
08-2015

267



269





# **Exhibit 4**



Freddie B. Pough  
Executive Director

P.O. Box 21069  
Columbia, SC 29221-1069

Henry McMaster  
Governor

djj.sc.gov



## MEMORANDUM

**DATE:** April 14, 2021

**TO:** Rhonda Holman, Deputy Director  
Division of Community Services

**THROUGH:** Dr. Zebulon D. Young, Associate Deputy *ZDY*  
Office of Human Resources

**FROM:** Norberto Perez, Jr. *NPJ*  
Employee Relations Office

**SUBJECT:** M. Carwane v S. Callaham – Complaint Investigation

### Introduction:

On March 30, 2021, Employee Relations received a complaint form from Michael Carwane of Tri-County alleging that Sandra Callaham was bullying and harassing him. Apparently Mr. Carwane was banned from the Edgefield County courthouse without a reason. Employee Relations investigated the complaint.

### Summary:

On March 30, 2021, Mr. Michael Carwane submitted a complaint and the complaint was used as his statement. Mr. Carwane went to the Edgefield courthouse to assist a coworker with one of their cases. Upon entering the courthouse, the bailiff noticed who it was and told him he could not enter the building. Mr. Carwane exited the building to wait for the coworker to finish with the hearing. During this time, the bailiff called the coworker and notified them that Mr. Carwane was outside waiting for them and that per the [REDACTED] Mr. Carwane was to be denied entry into the building. Mr. Carwane stated he immediately called the Regional Administrator to inform him of the situation and that he believes this to be another attempt from Ms. Sandra Callaham to continue bullying and harassing him.

---

Empowering Our Youth for the Future

Norberto Perez, Jr. | Office of Human Resources | 803.896.5602

On April 5, 2021, [REDACTED] provided the following statement: On March 30, 2021, Michael called and stated that he wasn't allowed in the courthouse building and that he would be outside. Ms. [REDACTED] asked the bailiff what's going on and the bailiff's response was that he was not allowed in the building per [REDACTED]. Later on, she talked to Sandra Callaham and told her of the situation and Ms. Callaham's response was that that was on Michael and she didn't need to worry about it.

On April 13, 2021, [REDACTED] provided the following statement: After having a conversation with Sandra Callaham, she informed him of why she is working strictly from the Edgefield office and not Saluda. She stated that there were on-going issues with Michael Carwane and that she feared for her safety. They discussed having restrictions implemented to where Michael Carwane could not enter the building if Ms. Callaham was there. He stated that Michael Carwane was not totally banned from the courthouse, but simply could not enter while Ms. Callaham was on the premises. He also stated that his staff felt uncomfortable every time Mr. Carwane had to come to the courthouse.

On April 13, 2021, Sandra Callaham provided the following statement: She discussed with [REDACTED] that if she is in the premises can they restrict Michael Carwane from entering the building for her safety concerns. She did have conversations with Edgefield staff about the on-going situation with Mr. Carwane and advised them that she was strictly working from the Edgefield office because of her safety. I, Norberto Perez, Jr. asked if she was allowed to carry a handgun into the courthouse for her protection and Ms. Callaham denied being allowed to carry a weapon into the building. Ms. Callaham admitted to speaking with [REDACTED] about the situation and why she was at Edgefield and not Saluda, after Mr. Amahl Bennett directed her not to speak of the situation with the employees in Saluda County. She admitted that Mr. Carwane had not been at the courthouse in a long time

During this investigation I received an email April 2, 2021, concerning the Saluda County office from Jan Geisen. In this email, it was reported that [REDACTED] did not want to return to the office because Mr. Carwane was returning back to work full time at the office and she was told that Ms. Callaham was working in Edgefield because he was returning. She stated that Mr.

Carwane was asked not to return to the Edgefield courthouse and that Ms. Callaham had permission to bring a handgun into the building for her safety concerns about Mr. Carwane. I inquired as to who gave [REDACTED] this information about the handgun to which the reply was [REDACTED] [REDACTED] received the information from Ms. Callaham herself. I asked for [REDACTED] to give me a statement concerning the situation and what was said and on April 6, 2021 I received her statement via email that was more polished in comparison to what was stated previously. In this revised statement [REDACTED] states that Ms. Callaham has a concealed weapon in her vehicle. It is of my professional expert opinion that the original statement of Ms. Callaham informing [REDACTED] of carrying a handgun into the courthouse is more accurate than stating she has a concealed weapon in her vehicle. Every other aspect of the subsequent statement reflected that of the original.

Ms. Callaham was directed by Amahl Bennett not to talk to or divulge any information to the Saluda County employees concerning what has been happening between Carwane and herself in order to prevent retaliation, unnecessary concern, and further hostile work environment towards any other employees.

**Conclusion:**

As a result of the findings, this case is **founded** against Sandra Callaham for the following policy violations of the Department of Juvenile Justice:

**Policy 228, Progressive Employee Discipline, Item 41:** Failure to maintain satisfactory or harmonious working relationships with other employees, supervisors, or other entities involved in service to juveniles

**Policy 228, Progressive Employee Discipline, Item 58:** Violation of written rules, regulations, policies, and/or local procedural guidelines

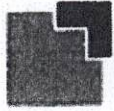
**Policy 228, Progressive Employee Discipline, Item 59:** Insubordination/refusal to carry out written directives or oral instructions from a superior

**Policy 228, Progressive Employee Discipline, Item 62:** Knowingly circulating false reports, malicious gossip or rumors contrary to good order

**Recommendation:**

Provide Ms. Sandra Callaham disciplinary actions for the founded policy violations. According to the history between Mr. Carwans and Ms. Callaham, I also recommend that the two are separated from working together and reassign one of them to a new county in order to prevent any instances of further toxic hostile working environment.

# Exhibit 5



# ROBINSON GRAY

Litigation + Business

NICOLAS L. HAIGLER  
DIRECT 803.231.7847  
nhaigler@robinsongray.com

April 21, 2023

**VIA E-MAIL**

South Carolina Administrative Law Court  
Edgar A. Brown Building  
1205 Pendleton St., Suite 224  
Columbia, SC 29201  
[eeasler@scalc.net](mailto:eeasler@scalc.net)

RE: Michael Carwane v. SC Department of Juvenile Justice  
WCC No.: 2119916  
DOI: 09/01/2021  
Claim No.: 2021-1998  
Our File No.: 7056/8101

Dear Ms. Easler:

Enclosed please find the Defendants' Response to the Appellant's Motion to Compel, in the above-referenced matter.

By copy of this letter, we are hereby serving a copy of the attached document upon the claimant. Should you have any questions, please do not hesitate to contact me.

Very truly yours,

Nicolas L. Haigler, Esquire

Enclosures

cc: Michael Carwane, Pro Se (via email)  
David Edwards (via email)



Appellant served a subpoena on the SAF on January 30, 2023, requesting identical information. See Exhibit A. The SAF provided a response to that subpoena via email on February 9, 2023, and then provided a supplemental response on February 16, 2023. See Exhibit B.

3. The Appellant subsequently filed a Motion to Compel, identical to one which is the subject of this response, with the WCC. By way of an Order issued by Commissioner Cindy Dooley on March 29, 2023, the SAF was requested to provide a privilege log to the Appellant. The privilege log was provided on April 6, 2023. See Exhibit C. Accordingly, all documents responsive to the Appellant's subpoena to the SAF have been provided.
4. The documents and information requested pursuant to the subpoena from February 13, 2023, are now unduly repetitious and duplicative to a previous response provided to the Appellant. See S.C. Code Ann. 1-23-330.
5. The SAF further asserts that given these previous complete responses, the Appellant's continue pursuit of this Motion can only be meant to harass the SAF.

For these reasons, the Appellant's Motion should be DENIED.

Respectfully submitted,  
ROBINSON GRAY STEPP & LAFFITTE,  
L.L.C.

By: 

Nicolas L. Haigler, Esquire  
Post Office Box 11449  
Columbia, SC 29211  
(803) 929-1400

ATTORNEYS FOR THE DEFENDANTS

Columbia, South Carolina

April 21, 2023

# Exhibit 6

STATE - REGIONAL

## SLED finds some DJJ misconduct could've been investigated better

*File photo*

by: [Kevin Accettulla](#), [Braley Dodson](#)  
Posted: Nov 16, 2021 / 11:31 AM EST  
Updated: Nov 16, 2021 / 12:09 PM EST

MYRTLE BEACH, S.C. (WBTW) — The South Carolina Law Enforcement Division (SLED) found that some Department of Juvenile Justice (DJJ) misconduct could've been investigated better, but found no evidence of underreporting or not reporting criminal activity, according to documents obtained by News13.

The investigation into the processes, conducted in August, looked into how criminal allegations are handled within state detention centers.

The SCDJJ Office of Inspector General is the agency that conducts those investigations. The investigators are assigned to five to ten cases a week.

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Most incidents are allegations of juvenile-on-juvenile assaults, and use of force by juvenile correctional officers, according to the review. An investigation is required any time that a correctional officer uses force on a person who is incarcerated to determine if it was appropriate. Force most commonly happens when juveniles are restrained or separated when they're in a fight and don't obey a correctional officer's commands.

Video is usually available for those cases, and the investigations tend to be "straightforward," according to the documents. However, investigations into contraband, sexual assaults and assaults involving bodily fluids tend to be more in-depth.

But when it comes to those cases going through the justice system, there's additional challenges. Assault cases are "historically difficult to prosecute due to the lack of cooperation from witnesses," according to the review.

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#### **Advocates say reform of South Carolina's juvenile justice system is much needed >**

The SLED investigation also found gaps in the interview system. There's not a designated staff member to serve as a victim advocate or notify a juvenile's family when they're a victim, witness or the subject of an alleged incident. There's also not a designated location to conduct interviews, which happen over the phone, on Google Teams, in a cubicle environment or in a communicable area.

This, the report states, is "problematic."

Cases have been closed without a completed investigative report, and those reports are often riddled with grammatical issues and a "stunning lack of detail," including only using one or two sentences from an interview instead of a more detailed account.

"Oftentimes an OIG investigative case file is not reflective of a professional law enforcement work project," the report reads.

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The report suggests several improvements that can be made, which include filling the vacant inspector general position, improved communication amongst the SCDJJ, hiring a victim advocate, utilizing gang investigators, providing recording equipment and a private location to conduct interviews, advanced training, consistency in reporting case files, preserving video and strengthening communication with prosecutors.

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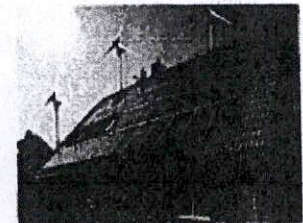
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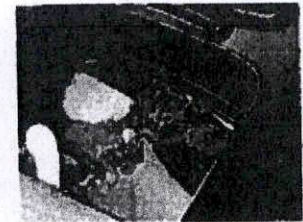
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# Exhibit 7

**RE: Michael Carwane v. DJJ 23a0111-IJ**

mcarwane@yahoo.../Inbox

Apr 10 at 11:54 AM

**NH**

**Nick Haigler** <nhaigler@robinsongray.com>

To: Erika S. Easler <eeasler@scalp.net>

Cc: gbozeman@popeflyn.com <gbozeman@popeflyn.com>,  
holmes@townofsaluda.com <holmes@townofsaluda.com>,  
gmatthews@richardsonplowden.com <gmatthews@richardsonplowden.com>,  
lglover@saf.sc.gov <lglover@saf.sc.gov>, EFARTHING@SAF.SC.GOV <efarthing@saf.sc.gov> more...

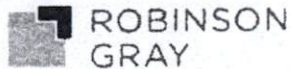
Good morning Erika:

By way of introduction I represent the State Accident Fund and Department of Juvenile Justice the a workers' compensation claim filed by Mr. Carwane. I wanted to provide a bit of background in hopes of possibly streamlining some of the issues involved here. First, Mr. Carwane served subpoenas to both the SAF and DJJ in February requesting certain documents. Those subpoenas are identical to those attached to this email, although they were served on the Form 27 subpoena (WC Form). As counsel in the WC claim I responded to both subpoenas separately. Mr. Carwane was not satisfied these responses were complete and as such decide to file a Motion to compel each to provide complete responses. Commissioner Cindy Dooley, by way of an Order issued in March, granted his Motion and requested that we provide a privilege log of any information not being provided in response to the subpoenas. The privilege log was provided to Mr. Carwane on Thursday, April 6th.

As such, as it pertains to the subpoenas served on the SAF and DJJ pursuant to the Workers' Comp Act, and as it pertains to the identical subpoenas contained in the attachment, a complete response has been served on Mr. Carwane. I am not sure whether Mr. Carwane will acknowledge this information as accurate, but he is copied on this email in case he wishes to do so. Insomuch as he wishes to continue to litigate these issues before the Administrative Law Judge, we assert his pursuit would be frivolous in nature.

If you have any questions, or need clarification in any way, I can be reached directly at 803-231-7847.

Thanks -- Nick



**NICK HAIGLER MEMBER**

DIRECT 803.231.7847

[VCARD](#) [VIEW BIO](#)

[ROBINSONGRAY.COM](http://ROBINSONGRAY.COM)

2151 Pickens Street

Suite 500

PO Box 11449 (29211)

Columbia, SC 29201



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285

RE: Michael Carwane (2119916) [IMAN-CLIENTS.FID422877]

mcarwane@yahoo.../inbox

**NH** Nick Haigler <nhaigler@robinsongray.com>  
To: carwane michael <mcarwane@yahoo.com>

Jun 20 at 1:03 PM

Mr. Carwane:

I think we are just going to have to agree to disagree on what has transpired in this case. However, what has not transpired is you getting any benefits or treatment, which I know you want. Would it be possible for us to discuss possibility resolving this claim so you can put some money in your pocket, get your treatment, and move on from this process? If not that's fine, but I wanted to ask again.

Nick



**NICK HAIGLER MEMBER**

DIRECT 803.231.7847

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2151 Pickens Street  
Suite 500  
PO Box 11449 (29211)  
Columbia, SC 29201

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From: carwane michael <mcarwane@yahoo.com>

Sent: Tuesday, June 20, 2023 12:18 PM

To: Nick Haigler <nhaigler@robinsongray.com>; Emily S. Andrews <eandrews@robinsongray.com>; Jennifer Blackmon <jblackmon@robinsongray.com>; Amber N. Baust <abaust@robinsongray.com>; Ursula R. Veguilla <uveguilla@robinsongray.com>; Kristin McConnell <kmccconnell@robinsongray.com>; Cardwell, April <acardwell@wcc.sc.gov>

Cc: John Boyd <jboyd@hsblawfirm.com>

Subject: Re: Michael Carwane (2119916)

Hello, Thank you for the update.

I would like to respond to some of the points and questions contained in this email.

At the last pre-hearing conference, Commissioner Dooley offered to me to facilitate a meeting to include herself, the Saluda Police Department, and myself (as a pro se litigant) to enforce the full Discovery requests of the submitted Subpoena and Motion to Compel documents. I accepted this offer as solution to access the Discovery documents that were neither provided, nor was I given any explanation for the lack of full Discovery. My email request was subsequently ignored by the Police Department. I informed the Court then that the Attorney cited by the Defense Attorney, in that pre-hearing was not, in fact, a representative of the Saluda Police Department (alternatively, a representative of Saluda County office). I have not received any additional requested documents from the Saluda Police Department at this time, and would ask for the offer for a meeting to be honored.

It was the Defense Attorney, Nick Haigler that communicated the case be heard in Saluda. It is false to represent now that I, as the Claimant requested for the hearing to be heard in Saluda. I have not asked for additional delays to this process. The only time extensions I have sought have been due to the Defense Attorneys' unwillingness to respond to the legal Subpoena and Motion to Compel requests. I considered it a greater hardship to have to change venues (losing the prior understanding Commissioner Dooley has of this case) than to have to travel to Columbia.

If we are now being asked for our input, I would prefer to schedule with a hearing in front of Commissioner Dooley in Columbia, but not until I have been given the full Discovery Information.

Attorney Nick Haigler again contacted me to state there was no further information from the State Accident Fund, claiming there was no second recording from what he described as a courtesy call from that case manager. He did not provide an answer when I corrected him to explain that there were a series of phone contacts by that employee, to include a recorded conversation. Additionally, the SCDJJ peer statements addressed in the pre-hearing were never provided by Attorney Nick Haigler as directed by the Commissioner. He claimed during the pre-hearing conference that he could probably have those to me by the end of that day. Over a month and a half later, they still have not been received. Please review the transcript of the pre-hearing dialogue if there is confusion about this expectation. It is not my preference to now be comfortable with a failed response by the Defendant. I still require the support of the court for enforcement of my legal subpoena and Motion to Compel requests. Sincerely, Michael Carwane

On Monday, June 19, 2023 at 09:49:34 AM EDT, Cardwell, April <acardwell@wcc.sc.gov> wrote:

A pre-hearing conference was held in this matter on 4/26/23.

Comm. Dooley has confirmed with John Boyd, attorney for the Saluda Police Department, that the Department has responded to Mr. Carwane's Subpoena and has furnished all documents in their possession. If Mr. Carwane feels that there is additional information that has not been provided, he can contact Mr. Boyd via email or at 803-540-7731.

Regarding setting this matter for hearing – Comm. Dooley can retain jurisdiction and I can set this matter to be heard in Columbia.

The Claimant has requested that the case be heard in Saluda. If the case is sent to the next jurisdictional Commissioner, it is possible that it could be set in Columbia also, since that is within the 75 miles range distance for hearings. Please advise how the parties want the matter set for hearing.

Thanks

286

April Cardwell  
Administrative Coordinator for Commissioner Cynthia C. Dooley  
1333 Main Street, Suite 500  
Columbia, SC 29201  
(803) 737-5660 (direct line)  
acardwell@wcc.sc.gov



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# Exhibit 8

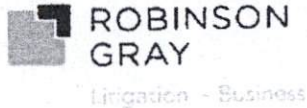
Attached please find additional documents that I believe are responsive to the subpoena you sent to the SAF. The first is the statement taken by Courtney Toole. The first five are your responses, and the rest of them are the employer's responses. If you click on the "response" box it will open up for you. This is all they could provide on this.

The second is the statement from the field investigator, Paul Jefferson.

I think this provides you with the information you wanted.

On another note, I think this is a claim we would both be best served to try to resolve amicably. I know the State Accident Fund is interested in doing so, and I think we can make it happen where you get the treatment you need, and compensation for your injury, and you can avoid this litigation and the possibility you do not prevail. Let me know if you want to discuss this.

Thanks – Nick



**NICK HAIGLER MEMBER**

DIRECT 803.231.7847

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686

#### COMMENT

I think Mr. Carwane is a bit dramatic but I believe that he had a compensable injury to his right knee and right forearm and left ankle/left achilles. He also complained of a knot between his left rib cage and his hip but I don't think that was the result of this incident (if there is even a knot there at all). He also complained of high blood

#### EMPLOYEE STATEMENT

On December 2 I met with Mr. Carwane and took his recorded statement using a hand held recorder. I have sent a Help Request to IT and consulted with IT regarding a way to transcribe the recording and Arthur Drawdy discussed it with me and we tried a couple of options and have not found a workable way to get the recording transcribed.

Mr. Carwane said that he is still having problems with his right knee. He exacerbated his pre-existing condition. He gets swelling and some pain that is worse now than it was before the accident on September 1. Also his right forearm still has a knot on it and he occasionally gets sharp pains up his arm. He said he didn't fall all the way to the ground but his leg went down in to the sink hole. Also his left achilles began hurting later that night after the fall. He also has a knot there still. It is still giving him problems with stiffness and low level pain. The final issue is a knot exists on his left side between his lower rib cage and his hip. He said it is not currently painful. That is the extent of his current injuries.

Mr. Carwane said that Amahl Bennett was his supervisor at the time. His first treatment was at Newberry County Memorial Hospital. His follow-up treatment has been at Family Healthcare North Saluda with Dr. Nicole Clark. He has not been treated by any other medical providers.

Mr. Carwane said that he had been told that he was transferred to the Greenwood office. September 1 was to be his last day at the Saluda office. September 2 was to be his first day working out of the Greenwood office. On September 1 his personal vehicle/truck was in the shop. He was going to move his stuff out of his Saluda office that day. That morning he came to the Saluda office for work. He walked from home because his truck was in the shop and he lives within walking distance of the office. He worked that morning. He had lunch at about 1:30 to 2:30. He then came back in the office and got the key fob to one of their state vehicles. He had already signed it out for use. He went out the front door with the key fob in hand. He said they have two vehicles that look identical. One of these two cars was parked on the street just to the left of the front door. He thought he had the key fob for that vehicle. He pushed the button on the fob and discovered that he was going to the wrong vehicle. So he turned around and looked down the street to just past the corner where the other car was parked. It was parked on the first side street in the first or second parking spot. He did not come back up onto the sidewalk. Instead he walked along the edge of the street where there are parking spaces. There is a railing between the street parking spaces and the sloped walkway. He walked on the street side of the railing. As he walked by he could see Pam Hudson was in the office window. He said it looked like she was watching what he was doing. Just

#### EMPLOYER STATEMENT

---

On November 29 I talked to Mr. Carwane's former Supervisor, Amahl Bennett (803-528-0396 Work cell). He confirmed that at the time of the incident (September 1, 2021) he was Mr. Carwane's Supervisor. He had been Mr. Carwane's Supervisor since January 2021. He said Mr. Carwane has a new Manager and a new Regional Manager as of the day he transferred to the Greenwood Office on September 2. The new Direct Supervisor is Heather Ponce (County Office Mgr./ Office # 864-229-6648 / heatherponce@djj.sc.gov). The Regional Administrator is Jennifer Clarke (Work Cell # 803-665-9856 / jenniferclarke@djj.sc.gov). Mr. Bennett said that they had previously had some allegations between Mr. Carwane and his former supervisor (Sandra Callahan) and it was being investigated. Mr. Bennett said that he also might be accused of something by Mr. Carwane and that might be investigated as well. He is not sure if that will happen or not but he therefore doesn't want to be present when I question Mr. Carwane. Mr. Bennett said that Mr. Carwane called him the day of the incident and asked for advise on what to do and Mr. Bennett chose not to give him any advise. Mr. Bennett said that Mr. Carwane had been working in the DJJ Tri-County Office in Saluda. He had been reassigned to the DJJ Greenwood Office. The stuff he was moving was both personal property and DJJ property. Mr. Bennett said that Mr. Carwane should have asked to use the state

#### MEDICAL DOCUMENTATION

We have all the known medical records. They are from Newberry County Hopspital and Family Healthcare North Saluda. The first treatment was at the ED of Newberry County Hospital on September 1, 2021. This states; "...walking around his workplace...fell into a sink hole." Also, "...pain to right knee and right forearm." The diagnosis was, "Right knee sprain."

#### RECOMMENDATION

Accept only the two medical visits on September 1 and September 2, 2021.

**RESPONSE**

I was at work, finished lunch break, checked out state vehicle in order to move some knee from a previous injury. Waited until WC coordinator was done w/ court. 35 min they didn't know what she was talking about. The questioning itself was so difficult. They could feel a big lump on his left side but the doctor never addressed it just said he ne. Asked Mylene what IW was doing when injured, what was he doing w/ the state car. ! Newberry ER

By regional supervisor

Per Mylene, there are some concerns w/ this incident as his story changes as he is asked n/a

Yes- IW has been reassigned to the Greenwood location

n/a

n/a

TBD

He is working at the Greenwood location

yes

**RESPONSE\_DATE**

9/8/2021 04:53:17 PM

9/8/2021 04:53:17 PM

9/8/2021 04:53:17 PM

9/8/2021 04:53:17 PM

9/9/2021 04:31:57 PM

9/15/2021 10:28:50 AM

9/15/2021 10:28:50 AM

9/15/2021 10:28:50 AM

9/15/2021 10:29:38 AM

9/15/2021 10:29:38 AM

9/15/2021 10:29:38 AM

9/15/2021 10:29:58 AM

9/15/2021 10:29:58 AM

9/15/2021 10:29:58 AM

9/15/2021 10:30:03 AM

**QUESTION**

Please describe what happened when the injury occurred? Part of body?

Did you feel pain? Did the pain limit your activities? If so, describe these limitations.

Were there any witnesses to your accident? Names? Were you working alone?

Did you notify your supervisor? If so, who and when? Did you say anything to your

Please describe how the injury occurred. Date? Time? Witnesses?

Do you know who the physician is treating the employee for the injury? Have you re-

When and how were you notified? Did the employee notify your designated supervi-

Are you questioning the accident? If so, why?

To your knowledge, does the employee have any outside activities or medical conditi-

Is there transitional/modified duty available? (ERTW) Are you holding the job? If so, Yes-

Confirm/deny that the employee's alleged work activities contributed to the injury.

Was there any equipment involved in the injury? Who owns, sets up and maintains it?

Confirm or obtain wage information.

If so, when did they start losing wages? Returned to work? When? Paid for the date o-

Do you provide sick leave benefits? If so, have you paid any sick leave?

**RESPONSE**

I was at work, finished lunch break, checked out state vehicle in order to move some  
knee from a previous injury. WAited until WC coordinator was done w/ court. 35 min

they didn't know what she was talking about. The questioning itself was so difficult. T

could feel a big lump on his left side but the doctor never addressed it just said he ne

Asked Mylene what IW was doing when injured, what was he doing w/ the state car. !

Newberry ER

By regional supervisor

Per Mylene, there are some concerns w/ this incident as his story changes as he is ask

n/a

IW has been reassigned to the Greenwood location

n/a

n/a

TBD

He is working at the Greenwood location

yes

# Exhibit 9

Re: Subpoena Responses [IMAN-CLIENTS.FID422877]

mcarwane@yahoo.../Sent



carwane michael <mcarwane@yahoo.com>  
To: Nick Haigler <nhaigler@robinsongray.com>

Mar 7 at 12:51 PM

I am open to more discussion regarding an offer to settle the claim, but not as an alternative to receiving full discovery. Said another way, it is those facts of the case that would best guide us (or me if you are unconcerned) regarding an equitable settlement. I am also concerned about the SCDJ's unwillingness to produce full discovery as it relates to my other hearings/litigation with them. It appears they are taking a strategy that does not just singularly account for the Workman's Comp. claim, as you have tried to assert to me that this addresses alone. Thank You. Michael Carwane

On Monday, March 6, 2023, 04:08:25 PM EST, Nick Haigler <nhaigler@robinsongray.com> wrote:

Mr. Carwane. This is all we have. If you want to file a motion or depose one of my clients to confirm this let me know. I would also suggest you make an offer to settle this claim. That may be a more cost-effective and financially advantageous option for you. Let me know if you want to discuss.



1000 Lakeside Drive, Suite 500  
Columbia, SC 29201

NICK HAIGLER MEMBER

PHONE: 803.231.7847  
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From: carwane michael <mcarwane@yahoo.com>  
Sent: Monday, March 6, 2023 11:24 AM  
To: Nick Haigler <nhaigler@robinsongray.com>  
Subject: Re: Subpoena Responses [IMAN-CLIENTS.FID422877]

No, to be clear, I believe I am entitled to more than that (as stated in my original subpoena requests). I had named specific people during the last conference call to make it apparent to both you and the commissioner that I had not yet received a full response. I am not trying to reduce the size of my records request now that the involved agencies have been evasive in honoring those subpoenas. I gave it time immediately following the last conference call, because you represented that you would address the concern that day with each of your clients. Sincerely, Michael Carwane

On Wednesday, March 1, 2023, 01:28:21 PM EST, Nick Haigler <nhaigler@robinsongray.com> wrote:

To be clear, you still believe you are entitled to statements from those 3 people and the audio recording?

I can check (again) on the statements, but the audio recording no longer exists. I think I've said that several times.



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NICK HAIGLER MEMBER

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From: carwane michael <mcarwane@yahoo.com>  
Sent: Wednesday, March 1, 2023 10:57 AM  
To: Nick Haigler <nhaigler@robinsongray.com>  
Subject: Re: Subpoena Responses [IMAN-CLIENTS.FID422877]

I reviewed the provided documents, but still do not believe this fully satisfies my original subpoena request. I have concerns that the audio recording is not being made available, as I provided over two hours of testimony, that is not fully displayed in the provided spread sheet or report (which dedicates almost as much time to the opinions of others). I specifically cited to you when you asked during our second conference call with the commissioner, that I had requested supervisory (Amahl Bennett and Sandra Callahan) and peer statements (to include that of Johnnie Mae Herbert, who was listed as a witness to the event). In an effort to continue to operate in good faith I must communicate to you that I am still unsatisfied with the less than full response to my Discovery attempt. Please ask the parties you represent to revisit this. Thank You, Michael Carwane

On Thursday, February 16, 2023, 01:55:19 PM EST, Nick Haigler <nhaigler@robinsongray.com> wrote:

Mr. Carwane,

Attached please find additional documents that I believe are responsive to the subpoena you sent to the SAF. The first is the statement taken by Courtney Toole. The first five are you responses, and the rest of are the employer's responses. If you click on the "response" box it will open up for you. This is all they could provide on this.

The second is the statement from the field investigator, Paul Jefferson.

I think this provides you with the information you wanted.

On another note, I think this is a claim we would both be best served to try to resolve amicably. I know the State Accident Fund is interested in doing so, and I think we can make it happen where you get the treatment you need, and compensation for your injury, and you can avoid this litigation and the possibility you do not prevail. Let me know if you want to discuss this.

Thanks - Nick



NICK HAIGLER MEMBER

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Re: [External] Michael Carwane (2119916) [IMAN-CLIENTS.FID422877]

mcarwane@yahoo.../Sent

mcarwane@yahoo.com  
To: Cardwell, April <acardwell@wcc.sc.gov>, Nick Haigler <nhaigler@robinsongray.com>  
Cc: Emily S. Andrews <eandrews@robinsongray.com>, Ursula R. Veguilla <uveguilla@robinsongray.com>

Apr 26 at 3:01 PM

I had an "introductory" phone call. But I did not have only one phone contact with her, and she specified in one of the non-"introductory" calls that it was to take a recorded statement, and that she was recording me. I consented to that. There were multiple calls, not one.

On Wednesday, April 26, 2023, 02:07:48 PM EDT, Nick Haigler <nhaigler@robinsongray.com> wrote:

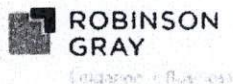
Mr. Carwane:

I have asked the State Accident Fund about the audio recordings again, per our agreement today. Here is the exact unredacted response:

*Paul Jefferson initially investigated his claim for State Accident Fund. We do NOT have an audio recording, nor do we have a transcript, of that phone call. Paul is now deceased and obviously no longer with SAF. Courtney Toole was the "investigating adjuster" at the time, and she had a phone call with Mr. Carwane that was NOT recorded so, of course, we do not have any audio recording of that call. It was simply an introductory phone call that we (adjusters) make on claims to get the employee's statements, etc. The notes that you have would be the entirety of any "record" that we have of that call.*

As you know this is exactly the same response I have previously provided to you, and I hope this is satisfactory. As promised I am also requesting the statements and investigation report from DJJ, but do not have a response on those yet. When I do, you'll have it.

Thanks - Nick



NICK HAIGLER MEMBER

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From: Cardwell, April <ACardwell@wcc.sc.gov>  
Sent: Tuesday, April 25, 2023 6:32 PM  
To: Nick Haigler <nhaigler@robinsongray.com>; carwane michael <mcarwane@yahoo.com>  
Cc: Emily S. Andrews <eandrews@robinsongray.com>; Ursula R. Veguilla <uveguilla@robinsongray.com>; Bracy, Amy <bracy@wcc.sc.gov>  
Subject: RE: [External] RE: Michael Carwane (2119916) [IMAN-CLIENTS.FID422877]

Yes, this matter is still on the docket for tomorrow, 4/26/23.

April Cardwell  
Administrative Coordinator for Commissioner Cynthia C. Dooley  
1333 Main Street, Suite 500  
Columbia, SC 29201  
(803) 737-5660 (direct line)  
acardwell@wcc.sc.gov

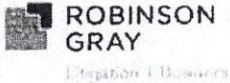


From: Nick Haigler <nhaigler@robinsongray.com>  
Sent: Tuesday, April 25, 2023 5:33 PM  
To: carwane michael <mcarwane@yahoo.com>; Cardwell, April <acardwell@wcc.sc.gov>  
Cc: Emily S. Andrews <eandrews@robinsongray.com>; Ursula R. Veguilla <uveguilla@robinsongray.com>; Bracy, Amy <bracy@wcc.sc.gov>  
Subject: [External] RE: Michael Carwane (2119916) [IMAN-CLIENTS.FID422877]

Good evening April:

I assume we are planning to move forward at least with a pre-hearing conference tomorrow morning. I have two witnesses listed to appear, but I am not planning to ask either to drive from their respective locations in SC as I do not believe we are actually going to have a Hearing given the issues outlined below. All of this has been very frustrating and has been ongoing for many months without any resolution in sight.

Nick



**NICK HAIGLER MEMBER**

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**From:** carwane michael <[mcawane@yahoo.com](mailto:mcawane@yahoo.com)>  
**Sent:** Monday, April 24, 2023 3:28 PM  
**To:** Cardwell, April <[acardwell@wcc.sc.gov](mailto:acardwell@wcc.sc.gov)>; Nick Haigler <[nhaigler@robinsongray.com](mailto:nhaigler@robinsongray.com)>  
**Cc:** Emily S. Andrews <[eadrews@robinsongray.com](mailto:eadrews@robinsongray.com)>; Ursula R. Veguilla <[uveguilla@robinsongray.com](mailto:uveguilla@robinsongray.com)>; Amy Bracy <[abracy@wcc.sc.gov](mailto:abracy@wcc.sc.gov)>  
**Subject:** Re: Michael Carwane (2119916) [IMAN-CLIENTS.FID422877]

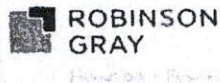
Mr. Haigler: It is again clear that it is your intention to try to advance to a hearing, without first providing full Discovery, as required. This is what my email response is about. Please reread the original subpoena and compare that to what you have actually provided. I have given you names for two supervisors, Sandra Callahan and Amahl Bennett. I have given you the name of my coworker witness Johnny Mae Herbert, yet received no documentation. I have not received anything regarding the SCDJJ HR investigation, due for a formal complaint process with them. I have not received full Discovery for the HR investigation of my other reported formal complaints. I have not received documentation of any sort from the SCDJJ arm of the Inspector General's investigation(s). Neither am I satisfied with the response you have provided representing the State Accident Fund. Instead of acting baffled or put upon by my email, please respond to these matters, without further obstruction of the legal Subpoena and Motion to Compel processes. This is only an issue now before the hearing, because you have not provided full Discovery and I am asking for that to be enforced PRIOR to the hearing, so that I am not limited in my presentation of the Truth there. You clearly have misconstrued my patience since issuing the initial Subpoena as either a weakness to exploit as a lawyer, or an issue I would choose to defer on. I was clear to you, when you offered to discuss a settlement dollar amount that I would not do that in lieu of receiving full Discovery. Please address this with prompt attention instead of waiting to see everyone on Wednesday. Michael Carwane

On Monday, April 24, 2023, 02:41:05 PM EDT, Nick Haigler <[nhaigler@robinsongray.com](mailto:nhaigler@robinsongray.com)> wrote:

Mr. Carwane:

I really do not know how to respond to this email. Unless I am told differently I will see everyone on Wednesday.

Nick



**NICK HAIGLER MEMBER**

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**From:** carwane michael <[mcawane@yahoo.com](mailto:mcawane@yahoo.com)>  
**Sent:** Monday, April 24, 2023 10:54 AM  
**To:** Cardwell, April <[acardwell@wcc.sc.gov](mailto:acardwell@wcc.sc.gov)>; Nick Haigler <[nhaigler@robinsongray.com](mailto:nhaigler@robinsongray.com)>  
**Cc:** Emily S. Andrews <[eadrews@robinsongray.com](mailto:eadrews@robinsongray.com)>; Ursula R. Veguilla <[uveguilla@robinsongray.com](mailto:uveguilla@robinsongray.com)>  
**Subject:** Re: Michael Carwane (2119916) [IMAN-CLIENTS.FID422877]

I do not understand this response. I have never stated that I do not want a hearing (or intend to withdraw my form). What I have been adamant about is that I do not believe it is proper for me to attend a hearing, prior to the enforcement of my multiple Motion to Compel orders. I asked how I may participate in that process. Mrs. A. Cardwell answered me at the end of March, that she would ask the Commissioner and call me back. I did not receive that answer, or receive a call. Although Mr. N. Haigler has claimed (I strongly disagree) that he does not have more Discovery to provide for his clients, he does not represent the Saluda Police Department. Even if Mr. N. Haigler was able to satisfy the full subpoena request immediately preceding the hearing, there will be no Saluda Police representative present to accomplish the same. I, thus, foresee that everyone else will intend to rush to complete the hearing, without regard for the disadvantage this has put me in. Said another way, I want a fair hearing in which the Prior step of Discovery has been honored, FIRST.

Again, I point out how inappropriate it is that the attorney's cross reference other court proceedings when they believe it is in their best interest, while I have been limited by requests not to reference other court processes when I have communicated with the WCC staff.

Over a month ago, I made it plain to Mr. N. Haigler that there were other specific components of the original subpoena request that he has not honored. Resending the original documents is not what I requested, but is what he provided.

Even if an outcome for this WCC hearing is in my favor, I have now been additionally harmed, as the defense lawyers have already begun to falsely package the "outcome" of this Motion to Compel process to the other involved courts as a precedent for what they are required to provide relative to those completely separate set of Motions to Compel (also ignored).

I am trying to advocate for myself here, and need support as a pro se litigant from the governing body.

I am willing to further delineate to this authority the many ways my Motion To Compel orders have not been fully enforced, but I do not intend to go "back and forth" with the defense attorneys about it, because I have no authority over them.

This is why I asked for enforcement to be handled by the authority of the Commissioner (with my multiple legal Motion to Compel Orders) in the first place. I, alone, cannot make attorneys or State agencies do what they must. I would like further discussion and explanation prior to the Wednesday hearing, to get this right. Sincerely, Michael Carwane

On Monday, April 24, 2023, 10:12:52 AM EDT, Nick Haigler <nhaigler@robinsongray.com> wrote:

April, given he has a Motion(s) pending before the ALJ that is probably appropriate. Mr. Carwane if you want to discuss your claim with me let me know.

Nick



NICK HAIGLER MEMBER

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From: Cardwell, April <A.Cardwell@wcc.sc.gov>

Sent: Monday, April 24, 2023 10:01 AM

To: mcarwane@yahoo.com

Cc: Nick Haigler <nhaigler@robinsongray.com>; Emily S. Andrews <eandrews@robinsongray.com>; Jennifer Blackmon <jblackmon@robinsongray.com>; Amber N. Baust <abaust@robinsongray.com>; Ursula R. Veguilla <urvegulla@robinsongray.com>; Kristin McConnell <kmcconnell@robinsongray.com>

Subject: Michael Carwane (2119916)

Mr. Carwane --

In response to your voicemail of 4/21/23, if you do not want to attend the hearing set for 4/26/23 you can withdraw your Form 50 Request for Hearing.

April Cardwell  
Administrative Coordinator for Commissioner Cynthia C. Dooley  
1333 Main Street, Suite 500  
Columbia, SC 29201  
(803) 737-5660 (direct line)  
acardwell@wcc.sc.gov



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Litigation + Business

NICOLAS L. HAIGLER  
DIRECT 803.231.7847  
nhaigler@robinsongray.com

March 24, 2023

VIA E-MAIL

Ms. Amy Bracy  
Judicial Director  
SC Workers' Compensation Commission  
1333 Main Street, Suite 500  
Columbia, SC 29202-1715

RE: Michael Carwane v. SC Department of Juvenile Justice  
WCC No.: 2119916  
DOI: 09/01/2021  
Claim No.: 2021-1998  
Our File No.: 7056/8101

Dear Ms. Bracy:

Enclosed please find the Defendants' Rely to the Claimant's Motion to Compel, in the above-referenced matter.

By copy of this letter, we are hereby serving a copy of the attached document upon the claimant. Should you have any questions, please do not hesitate to contact me.

Very truly yours,

Nicolas L. Haigler, Esquire

Enclosures

cc: Honorable Cynthia C. Dooley, Commissioner (via email)  
Michael Carwane, Pro Se (via U.S. Mail, Certified Mail and email)  
David Edwards (via email)  
Tosha Autry (via email)



3. On February 9, 2023, the Defendants emailed the Claimant a copy of all documents believed to be responsive to the subpoena.
4. A Hearing was scheduled before Commissioner Cynthia Dooley on February 15, 2023. During a pre-hearing conference on February 14, 2023, the claimant asked for a brief postponement so he could move to compel a complete response to his subpoena. Counsel for the defense also advised he would confirm again that the specific information Claimant was seeking could be secured and provided.
5. The Hearing was rescheduled for March 21, 2023.
6. On February 16, 2023, the Defendants emailed the Claimant additional materials believed to be responsive to his subpoena, including the aforementioned statements from Courtney O'Toole and Paul Jefferson.
7. On March 1, 2023, the Claimant emailed counsel for the Defendants requesting additional materials he believed existed but were not provided to him. The Defendants have since responded on March 6, 2023, and March 8, 2023, indicating we have provided all responsive documents. The Motion that is the subject of this Reply followed.
8. The Hearing has now been rescheduled yet again for April 26, 2023.
9. The Defendants assert they have provided a complete response to the claimant's subpoena and have notified him of this at numerous points during the past few weeks. In addition, numerous documents requested are either so ambiguous or so vague and unclear that they cannot be deciphered and, therefore, not provided. Finally, the claimant cannot compel SCDJJ to produce what does not exist, or what is protected by attorney-client privilege.

The Defendants have fully and diligently replied to the Claimant's subpoena, and he has produced no evidence to the contrary. The Defendants request the Commission deny the Motion to Compel filed by the Claimant.

Respectfully submitted,  
ROBINSON GRAY STEPP & LAFFITTE,  
L.L.C.



By: \_\_\_\_\_  
Nicolas L. Haigler, Esquire  
Post Office Box 11449  
Columbia, SC 29211  
(803) 929-1400

ATTORNEYS FOR THE DEFENDANTS

Columbia, South Carolina

March 24, 2023

**CERTIFICATE OF SERVICE**

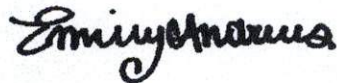
I, the undersigned, Legal Assistant with the law offices of Robinson Gray Stepp & Laffitte, LLC, attorneys for Defendant, do hereby certify that I have served counsel of record with the foregoing document(s) by electronic service to the following address(es):

Document(s) Served: **DEFENDANTS' REPLY TO MOTION TO COMPEL**

Person/Party Served: **VIA E-MAIL**  
Ms. Amy Bracy  
Judicial Director  
SC Workers' Compensation Commission  
1333 Main Street, Suite 500  
Columbia, SC 29202-1715  
[judicialanalysts@wcc.sc.gov](mailto:judicialanalysts@wcc.sc.gov)

**VIA E-MAIL**  
Honorable Cynthia C. Dooley, Commissioner  
SC Workers' Compensation Commission  
1333 Main Street, Suite 500  
Columbia, SC 29202-1715  
[acardwell@wcc.sc.gov](mailto:acardwell@wcc.sc.gov)

**VIA U.S. MAIL, CERTIFIED MAIL AND E-MAIL**  
Michael Carwane, Pro Se  
302 The Heights Third Ave.  
Saluda, SC 29138  
[mcarwane@yahoo.com](mailto:mcarwane@yahoo.com)



---

Emily Andrews

Columbia, South Carolina

March 24, 2023

# Exhibit 10



<b>Date</b>	<b>Type/ Description</b>	<b>Privilege</b>	<b>Bates Stamp Number</b>
12/30/2022- 1/3/2023	Email correspondence between Jen Clarke, Brianna Jones, Heather Ponce, Sara Bunge, and Elizabeth Hill, Nicolas Haigler, Esquire and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000013-000021
12/15/2022- 12/28/2022	Email correspondence between Jen Clarke, Brianna Jones, Heather Ponce, Sara Bunge, and Elizabeth Hill, Nicolas Haigler, Esquire and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000022-000025
12/20/2022	Email correspondence between David Edwards, Brianna Jones, Nicolas Haigler, Esquire and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000026-000030
11/9/2022- 12/15/2022	Email correspondence between David Edwards, Brianna Jones, Nicolas Haigler, Esquire and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000031-000033
11/9/2022- 12/15/2022	Email correspondence between David Edwards, Brianna Jones, Nicolas Haigler, Esquire and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000034-000038
11/9/2022- 12/15/2022	Email correspondence between David Edwards, Brianna Jones, Nicolas Haigler, Esquire and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000039-000044
11/9/2022- 12/15/2022	Email correspondence between David Edwards, Brianna Jones, Nicolas Haigler, Esquire and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000045-000051
12/15/2022	Email correspondence between Brianna Jones, Amahl Bennett, Elizabeth Hill, and Sara Bunge discussing lawsuit	Work product; attorney-client privilege	000052

<b>Date</b>	<b>Type/ Description</b>	<b>Privilege</b>	<b>Bates Stamp Number</b>
12/15/2022	Email correspondence between Brianna Jones, Heather Ponce, Elizabeth Hill, and Sara Bunge discussing lawsuit	Work product; attorney-client privilege	000053
12/15/2022	Email correspondence between Brianna Jones and David Edwards discussing lawsuit	Work product; attorney-client privilege	000054-000055
11/9/2022	Email correspondence between David Edwards, Brianna Jones, Nicolas Haigler, Esquire and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000056
11/8/2022	Email correspondence between David Edwards, Brianna Jones, Nicolas Haigler, Esquire, Carson Hatcher and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000057-000059
11/8/2022	Email correspondence between David Edwards, Brianna Jones, Nicolas Haigler, Esquire and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000060-000061
11/4/2022	Email correspondence between David Edwards, Brianna Jones, and Nicolas Haigler, Esquire discussing lawsuit	Work product; attorney-client privilege	000062-000064
10/27/2022	Email correspondence between Brianna Jones, Amahl Bennett and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000065-000067
10/27/2022	Email correspondence between Brianna Jones, Amahl Bennett and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000068-000070
10/19/2022	Email correspondence between David Edwards, Brianna Jones, Nicolas Haigler, Esquire, Emily Andrews, and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000071-000075

<b>Date</b>	<b>Type/ Description</b>	<b>Privilege</b>	<b>Bates Stamp Number</b>
10/11/2022	Email correspondence between David Edwards, Brianna Jones, Nicolas Haigler, Esquire and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000076-000077
10/11/2022	Email correspondence between Brianna Jones, Adrian Cartledge, Kendrick Holland, Quiotis Fletcher and Jermaine Gordon discussing lawsuit	Work product; attorney-client privilege	000078
10/11/2022	Email correspondence between David Edwards, Brianna Jones, Nicolas Haigler, Esquire and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000079-000094
10/14/2022	Email correspondence between David Edwards, Brianna Jones, Nicolas Haigler, Esquire and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000095-000097
9/28/2022	Email correspondence between David Edwards, Brianna Jones, Nicolas Haigler, Esquire and Ursula Veguilla discussing lawsuit	Work product; attorney-client privilege	000098-000100

Respectfully submitted,

ROBINSON GRAY STEPP & LAFFITTE, L.L.C.



By: \_\_\_\_\_

Nicolas L. Haigler (SC Bar 76684)  
 Robinson Gray Stepp Laffitte, LLC  
 Post Office Box 11449  
 Columbia, South Carolina 29211  
 (803) 929-1400

Attorneys for Defendant, SC Department of Juvenile  
 Justice and SC State Accident Fund

Columbia, South Carolina  
 April 6, 2023



# **Exhibit 11**

RE: Michael Carwane deposition request [IMAN-CLIENTS.FID422877]

mcarwane@yahoo.../Inbox



Nick Haigler <nhaigler@robinsongray.com>  
To: carwane michael <mcarwane@yahoo.com>  
Cc: Carson Y. Hatcher <chatcher@robinsongray.com>.  
Ursula R. Veguilla <uveguilla@robinsongray.com>

Nov 4, 2022 at 10:46 AM

Mr. Carwane:

I appreciate your comments but unfortunately that is not possible. You have requested a Hearing and I have the absolute right to depose you before that Hearing happens. If you do not want to voluntarily submit to a deposition then I will file a subpoena requiring your appearance, and I will notify the Commission of your decision. If you have not scheduled your deposition by 5pm today we will issue the subpoena.

Thanks - Nick

NICK HAIGLER EXECUTIVE COMMITTEE MEMBER  
DIRECT 803.231.7847  
VCARD VIEW BIO  
ROBINSONGRAY.COM

2151 Pickens Street  
Suite 500  
PO Box 11449 (29211)  
Columbia, SC 29201

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Supporting Green print wisely.

-----Original Message-----

From: carwane michael <mcarwane@yahoo.com>  
Sent: Friday, November 4, 2022 10:42 AM  
To: Nick Haigler <nhaigler@robinsongray.com>  
Subject: Michael Carwane deposition request

Dear Mr. Nicolas Haigler,

I received a voice message this week from your law office requesting to schedule for a deposition. I am not inclined at this time to participate. I requested a formal review of my case with the Workers' Compensation Commission, and had not even heard from them regarding their process at the time of your office contact. I would like to make my presentation to the reviewing Commission when appropriate, rather than discuss with the legal team hired by my employer. Sincerely, Michael Carwane

# Exhibit 12

10/6/22, 11:23 AM

Michael Carwane Step Two Grievance Formal Request - Yahoo Mail

**Michael Carwane Step Two Grievance Formal Request**

mcarwane@yahoo.../Sent



carwane michael <mcarwane@yahoo.com>

To: DeWarren J. Register <dewarrenjregister@djj.sc.gov> ,

Sharese N. Johnson <sharesejohnson@djj.sc.gov>, EmployeeRelations <employeerelations@djj.sc.gov>

Oct 6 at 11:22 AM

Hello, I would like to submit this notice as a formal written request to proceed with the Step Two grievance process. Please notify me of receipt of this request, and contact me for scheduling options. I am also for the third time requesting full discovery of all documents related to my termination, in accordance with the grievance policy. I have voiced my concern about the disadvantage to me created by your refusal to have these documents available prior to engaging me in conversation for the Step One conference, or to assist me in my decision making. I am additionally mailing this written request today. Thank You, Michael Carwane

# Exhibit 13

**Re: Michael Carwane Step Two Grievance Formal Request**

mcarwane@yahoo.../Sent



carwane michael <mcarwane@yahoo.com>  
To: Sharese N. Johnson <sharesenjohnson@djj.sc.gov>  
Cc: DeWarren J. Register <dewarrenjregister@djj.sc.gov>,  
EmployeeRelations <employeerelations@djj.sc.gov>

Oct 7, 2022 at 1:00 PM

Mrs. Johnson and Human Resource Department staff,

On September 9th 2022 I stated in my grievance packet that, "Listed violations are neither itemized, or paired with alleged behaviors, obfuscating employees ability to understand or respond to the charges." I would still like to have an itemized, paired list of the policy violations to each behavior I am accused of being in violation of (and may be paired also with the document(s) to support each claim).

On September 20th I stated "I would like the reports made available to me, as stated in the grievance policy, prior to the initial scheduled mediation hearing. It would be appropriate to include the Human Resources reports related to my grievance response, investigation made by Human resources into my complaints, any supervisory reports regarding my termination, and any peer testimony given. Additionally, I asked for originally, yet never received any notice of my general rights at termination (besides those related to the grievance process). I am still in need of that information to assist me with my decision making. Please include information regarding options for continuing health coverage, unemployment insurance, etc. ... I believe these additional documents and information will allow me to participate in the mediation process."

On September 22nd I stated, " I do not want to be in a position to miss any deadlines ... All the information I have requested should have been available to you prior to the decision to terminate, so I am confused by the delay."

On September 23rd I stated, " Please begin with the items I have already requested, and use the standard of the grievance policy to guide you for additional documents that would be part of a standard disclosure for this type ( or any form of legal) discovery."

On September 23rd Mr. DeWarren Register's response stated, " Mr. Carwane, your requests can be answered and provided, but unfortunately it will not be prior to COB today as these items take time to gather." Close of Business has now occurred fourteen additional times without the documents being provided yet.

On September 28th I stated, " Mrs. Johnson, I would prefer the Oct 3rd date at 10 AM if I have received the discovery documents I have requested by that time." The Step One was not then rescheduled based on the documents being withheld.

On October 3rd at the Step One Conference I presented as my first concern to you the disadvantage of being scheduled for the hearing at that time, without having first received discovery documents as stated in the grievance rights. I explained that I was appreciative of having received the grievance rights and personnel file initially from Mrs. Lucas, and it was not helpful to have sent that a second time to me. I specifically questioned if I would have to submit a formal freedom of information request for the documents I have been refused, despite my grievance rights. I stated concern that SCDJJ was not acting in good faith and was being selective about citing policy (regarding grievance deadlines), while not itself meeting the grievance policy. You stated your understanding and gave me reassurance that I would not have to access the information by a freedom of information request, as you agreed it was within the stated grievance rights.

Why is there still delays and confusion in your department? I am not the first employee to move through the grievance process and ask for my rights. All of these documents would have needed to have been completed and submit to Human Resources prior to any of decision about termination itself (if handled legitimately), let alone for the grievance review process, thus, making them available now. If in doubt about a specific document, I would state that it should be made available, as a standard, if it could later be part of a legal defense presented by the SCDJJ.

I am asking for SCDJJ to match my sincerity on this matter. Good Day. Michael Carwane

On Friday, October 7, 2022, 09:00:12 AM EDT, Sharese N. Johnson <sharesenjohnson@djj.sc.gov> wrote:

Mr. Carwane:

At your request, DJJ has provided you with copies of your HR file, the prior complaints you have filed with HR, and the agency Employee Grievance policy. What other documents are you requesting at this time?

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Sharese N. Johnson

Employee Relations Consultant  
Office of Human Resources  
Central Office/Winthrop Building  
220 Executive Center Drive  
PO Box 21069  
Columbia, SC 29221-1069

p (803) 896-7376

e [ShareseNJohnson@djj.sc.gov](mailto:ShareseNJohnson@djj.sc.gov)

Empowering our youth for the future

-----Original Message-----

From: carwane michael <[mcarwane@yahoo.com](mailto:mcarwane@yahoo.com)>

Sent: Thursday, October 6, 2022 11:23 AM

To: DeWarren J. Register <[DeWarrenJRegister@djj.sc.gov](mailto:DeWarrenJRegister@djj.sc.gov)>; Sharese N. Johnson <[ShareseNJohnson@djj.sc.gov](mailto:ShareseNJohnson@djj.sc.gov)>; EmployeeRelations <[EmployeeRelations@djj.sc.gov](mailto:EmployeeRelations@djj.sc.gov)>

Subject: Michael Carwane Step Two Grievance Formal Request

\*\*\* This is an EXTERNAL email. Please do not click on a link or open any attachments unless you are confident it is from a trusted source. \*\*\*

Hello, I would like to submit this notice as a formal written request to proceed with the Step Two grievance process. Please notify me of receipt of this request, and contact me for scheduling options. I am also for the third time requesting full discovery of all documents related to my termination, in accordance with the grievance policy. I have voiced my concern about the disadvantage to me created by your refusal to have these documents available prior to engaging me in conversation for the Step One conference, or to assist me in my decision making. I am additionally mailing this written request today. Thank You, Michael Carwane

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# **Exhibit 14**

## Michael Carwane Step Two Grievance - Information Request

mcarwane@yahoo.../Inbox



DeWarren J. Register <dewarrenregister@djj.sc.gov>  
To: carwane michael <mcarwane@yahoo.com>

Oct 12, 2022 at 5:28 PM

Good evening, Mr. Carwane:

We have reviewed your request for information regarding your grievance of your termination. Please see below:

- Regarding your request for "an itemized, paired list of the policy violations to each behavior I am accused of being in violation of (and may be paired also with the document(s) to support each claim)," the Department does not have any documents responsive to this request.
- Regarding your request for "the reports made available to me, as stated in the grievance policy, prior to the initial scheduled mediation hearing. It would be appropriate to include the Human Resources reports related to my grievance response, investigation made by Human resources into my complaints, any supervisory reports regarding my termination, and any peer testimony given," you have been provided with the complaints that you have filed with HR along with a copy of your HR file. Additionally, attached to this email are notes/emails regarding your conduct while assigned to the Greenwood/Anderson office. Please note that these documents are redacted for the privacy of the individuals involved. The PDFs are password protected from editing but that will not affect your ability to view, save, or print.
- Regarding your request for "any notice of my general rights at termination (besides those related to the grievance process)," the Department has provided you a copy of Department Policy 233, Employee Grievance. Another copy is attached. The Department is unable to give you legal advice as to other rights related to employment. You should consult with an attorney for advice as to those rights.
- Regarding your request for "options for continuing health coverage," this information is not related to the grievance process, but you can contact SCDJJ Benefits Manager, Mylene Virata at [mylenevirata@djj.sc.gov](mailto:mylenevirata@djj.sc.gov) or at 803-5134.
- Regarding your request for "unemployment insurance," this information is not related to the grievance process, but you can contact the South Carolina Department of Employment and Workforce.
- Regarding your request for "discovery documents," a grievance process is not a criminal or civil litigation matter; therefore, the Department does not have any records responsive.

You indicated that you are concerned about missing deadlines, but you have met the internal timelines contained in Policy 223, so far. Please refer to Policy 223 for other internal/external deadlines that may apply. The Department has provided you with the information relevant to your termination, including your HR file which includes your disciplinary actions and complaints you filed with HR and additional notes/emails attached to this email.



### DeWarren Register, SHRM-CP, PHR, LSSBB

Human Resources Director  
Office of Human Resources  
Central Office/Winthrop Building  
220 Executive Center Drive  
Columbia, SC 29210

p 803.896.5602 | m 803.331.2203

e [DeWarrenJRegister@djj.sc.gov](mailto:DeWarrenJRegister@djj.sc.gov)

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Join Team DJJ at [careers.sc.gov](https://careers.sc.gov)

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**2 Files** 1.2MB



**Supporting Documentation - R.pdf**  
1024kB



**Policy 223.pdf**  
199kB

# Exhibit 15

**FW: Employee Michael Carwane contact request**

mcarwane@yahoo.../Inbox



Michael R. Carwane <michaelrcarwane@djj.sc.gov>

To: Michael Robert Carwane <mcarwane@troy.edu>, carwane michael <mcarwane@yahoo.com>

Feb 24, 2022 at 1:02 PM

From: Michael R. Carwane <MichaelRCarwane@djj.sc.gov>  
Sent: Thursday, February 24, 2022 1:02 PM  
To: Human Resources <HumanResources@djj.sc.gov>  
Cc: Michael R. Carwane <MichaelRCarwane@djj.sc.gov>  
Subject: Employee Michael Carwane contact request

Hello, I attempted to send this request through the SCDJJ Human Resources Portal, but was guided here. I requested through my direct supervisor (Heather Ponce) in February access to communicate with the new Human Resources Director, DeWarren Register. After she routed my request through the Regional Manager (Jan Clark), when I followed up I was told that there would be no conversation granted by DeWarren Register in my case, at this time. At the Greenwood staff meeting yesterday it was announced as a topic that the "Agencies that have been assisting DJJ in transition will be leaving this month". As I have been unable to communicate in the requested manner, I would like the opportunity to meet with a lead employee from the agencies that have been serving in the role of assisting the SC DJJ Human Resources Department, while they are still here. My preference is a face-to-face conversation, as I feel unable to best communicate my thoughts in other formats. Thank You. ISO Michael Carwane

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# Exhibit 16

**STATE OF SOUTH CAROLINA DEPARTMENT OF JUVENILE JUSTICE  
POLICY AND PROCEDURES**

<b>Title:</b>	<b>Employee Grievance</b>	<b>Policy No.:</b>	<b>223</b>	<b>Page(s):</b>	<b>1 of 8</b>
<b>Folder 200:</b>	<b>Fiscal Affairs and Human Resources</b>	<b>Old Policy No.:</b>	<b>B-3.15</b>		
<b>Originator:</b>	<b>Employee Relations Manager</b>				
<b>Agency Areas of Impact:</b>	<b>All</b>				
<b>Juvenile Justice Code:</b>	<b>n/a</b>				
<b>PbS Related Standard(s):</b>	<b>n/a</b>				
<b>Related Statutes/Regulations:</b>	<b>State Human Resources Regulations</b>				
<b>Effective Date</b>	<b>09-21-2021</b>	<b>SIGNED/ <i>L. Eden Hendrick</i></b>			
		<b>L. Eden Hendrick Acting Director</b>			
<b>Approval Date</b>	<b>09/21/2021</b>	<b>SIGNED/ <i>Heather Kever</i></b>			
		<b>Division of State Human Resources Representative</b>			

**THE LANGUAGE USED IN THIS DOCUMENT DOES NOT CREATE AN EMPLOYMENT CONTRACT BETWEEN THE EMPLOYEE AND THE DEPARTMENT. THIS DOCUMENT DOES NOT CREATE ANY CONTRACTUAL RIGHTS OR ENTITLEMENTS. THE DEPARTMENT RESERVES THE RIGHT TO REVISE THE CONTENT OF THIS DOCUMENT, IN WHOLE OR IN PART. NO PROMISES OR ASSURANCES, WHETHER WRITTEN OR ORAL, WHICH ARE CONTRARY TO OR INCONSISTENT WITH THE TERMS OF THIS PARAGRAPH CREATE ANY CONTRACT OF EMPLOYMENT.**

The South Carolina Department of Juvenile Justice is an equal opportunity employer. SCDJJ does not discriminate in hiring, promotions, discharge, pay, fringe benefits, job training, classification, referral or in any other aspects of employment, on the basis of race, color, religion, sex, participation in protected activity in the workplace, disability or national origin. Any acts you feel are in violation please contact the Office of Human Resources, 220 Executive Center Drive, Winthrop Building, Columbia, SC 29210 (803) 896-4733. The South Carolina Department of Juvenile Justice's School District also does not discriminate in any programs or activities on the basis of race, color, national origin, sex, religion, participation in protected activity in the work place, disability or age. The following offices have been designated to handle inquiries regarding the school district's nondiscrimination policies: Title IX - Inspector General's Office - 220 Executive Center Drive, Winthrop Building, Columbia, SC 29210 - Ph: 803-896-9595; 504 Special Education Office, 220 Executive Center Drive, Winthrop Building, Columbia, SC 29210- Ph: 803-896-8484

**PURPOSE AND SCOPE**

This policy complies with the State Employee Grievance Procedure Act, Title 8, Chapter 17 of the S.C. Code of Laws. A covered employee is defined as a full-time or part-time employee occupying a part or all of an FTE position who has completed the probationary period and has a "successful" or higher overall rating on the employee's performance evaluation and who has grievance rights. If an employee does not receive an evaluation before the performance review date, the employee must be considered to have performed in a satisfactory manner and be a covered employee. This policy does not apply to non-covered employees (for example, probationary employees, temporary employees, temporary grant employees, time-limited project employees, research grant employees, and employees exempt from the State Employee Grievance Procedure Act).

Title: Employee Grievance	SCDJJ Policy No.: 223	Originator: Employee Relations Manager	Page: 2 of 8
09/21/2021 Approval Date	SIGNED/ Heather Keever State Office of Human Resources Representative		

**POLICY**

Covered employees at the South Carolina Department of Juvenile Justice (SCDJJ or Department) may have certain adverse employment actions taken by the Department reviewed by Department management. Covered employees who have filed a grievance may receive assistance from the SCDJJ Employee Relations Officer (ERO). Employees choosing to file a grievance or appeal must not be disciplined or otherwise prejudiced for exercising their rights or for testifying under the provisions of this policy. The Department will take appropriate action against any person who causes an employee to be disciplined, subjected to retaliation, or prejudiced in their employment for exercising their rights under this policy.

**TRAINING**

Training on this policy and procedure will be provided to all new employees as part of new employee orientation. Additional training will be provided by the Department's Office of Human Resources (OHR) as part of the supervisory and management development programs. A copy of this policy and procedure is available to SCDJJ employees accessible through the PowerDMS application or upon request to the ERO. Employees may direct questions about this policy and procedure and the terms used within, to the OHR and ERO.

**ACTIONS THAT MAY BE GRIEVED AND APPEALED**

As provided for in the Act, and defined in § 8-17-320 of the S.C. Code of Laws, a covered employee may file a grievance or an appeal concerning only the following employment actions:

- A. Terminations;
- B. Suspensions;
- C. Involuntary Reassignments over thirty (30) miles from the prior workstation. (Reassignments and transfers within the same state salary range are not considered to be grievable or appealable.);
- D. Demotions;
- E. Punitive Reclassifications, but only when the Department, in case of a grievance, or the State Human Resources Director, in the case of an appeal, determines that there is a material issue of fact that the action was solely done to penalize the covered employee. (Reclassifications within the same state salary range are not considered to be grievable or appealable.);
- F. Promotions in instances where the Department, or in the case of appeals, the State Human Resources Director, determines that there is a material issue of fact as to whether or not the Department has considered a qualified covered employee for a position for which the employee formally applied or would have applied if the employee had known of the promotional opportunity. When a Department promotes an employee one organizational

Title: Employee Grievance	SCDJJ Policy No.: 223	Originator: Employee Relations Manager	Page: 3 of 8
09/21/2021 Approval Date	SIGNED/ Heather Keever State Office of Human Resources Representative		

level above the promoted employee's former level, however, that action is **not** a grievance or appeal for any other qualified covered employee. Failure to be selected for a promotion is **not** considered an adverse employment action which can be considered grievable or appealable;

- G. Salary Decrease based on performance as the result of an Employee Performance Management System (EPMS) evaluation; and
- H. Reduction in Force is considered as a grievance only if the Department, or as an appeal only if the State Human Resources Director, determines that there is a material issue of fact that the Department inconsistently or improperly applied its reduction in force policy or plan.

**BEFORE FILING A FORMAL GRIEVANCE**

Before filing a formal grievance, the covered employee may first attempt to resolve the matter informally with his immediate supervisor. This matter may be presented verbally or in writing. However, this is merely an informal attempt to resolve the matter and cannot be substituted for the requirements of Step One in the following procedure.

**PROCEDURE**

- A. Step One
  - 1. A covered employee who wishes to file a grievance must initiate the grievance with the Department's OHR. The grievance must be in writing and must be received (or, if mailed, postmarked) within 14 calendar days of the effective date of the action or 14 calendar days from when the employee is notified of the action, whichever is later. The employee should include a written summary of the facts of the grievance and the relief sought. Form 223A can be used by the covered employee to file the grievance.
  - 2. The Department's OHR Associate Deputy, or other designated official, shall initially review the grievance to determine whether the matter involves a grievance as defined by the Act. The Department's OHR Associate Deputy, or other designated official, may conduct appropriate investigations and fact findings as he or she may consider necessary to make this determination. If it is determined that the matter is not grievable, the covered employee shall be so advised in writing by the Department Executive Director, or a designee, normally within five (5) calendar days of receipt of the grievance. Such determination shall be a final decision within the Department, which may be appealed to the State Human Resources Director.
  - 3. Any initial determination by the Department's OHR Associate Deputy, or other designated official, that the matter may be grieved shall only entitle the covered

Title: Employee Grievance	SCDJJ Policy No.: 223	Originator: Employee Relations Manager	Page: 4 of 8
09/21/2021 Approval Date	SIGNED/ Heather Keever State Office of Human Resources Representative		

employee to have the matter considered under this grievance procedure and shall in no way be construed to be an adjudication of the merits of the grievance.

4. If it is determined that the matter is grievable, the Department's OHR Associate Deputy, or other designated official, will contact the covered employee and the appropriate Department representative(s), normally within five (5) calendar days of receipt of the grievance, to inform them the issue can be heard under this grievance procedure and inquire whether or not they desire to participate in voluntary mediation. (Form 223B) Both parties must make a written decision to the Department's OHR Associate Deputy, or designee, within three (3) calendar days of this notification. Failure by either party to respond timely to this notification is deemed a refusal to participate in the voluntary mediation, and the grievance process will move on to the Step One Conference noted in section #6 below. If either party declines voluntary mediation or fails to provide timely notification of their desire to participate in voluntary mediation, the grievance process will continue as indicated in section #6.
  
5. Mediation
  - a) When the covered employee and the Department representative(s) both agree in writing to participate in voluntary mediation, the Department's OHR Associate Deputy, or other designated official, will schedule a mediation conference to occur within five (5) calendar days and make the necessary arrangements for acquiring a mediator. The mediator will serve as an impartial third party who will encourage and facilitate a resolution to the dispute without advising what the result should be.
  - b) The mediation conference(s) will be confidential and limited to the parties and their representatives. Other persons may attend with the permission of the mediator and the other party.
  - c) The mediator may not be compelled by subpoena or otherwise to divulge any records or discussions or to testify regarding the mediation conference in any adversary proceeding or judicial forum. If the parties agree to settle the matter, the mediator will assist in drafting a mediation agreement for the parties to review and sign. The mediator may share the terms of the settlement agreement with the Department's designated officials who need to finalize and assist in implementing the agreement.
  - d) If the matter is not settled within eight (8) calendar days of the initial mediation conference, the mediator will inform the Department's OHR Associate Deputy or other designated official that settlement has not occurred. The Associate Deputy will notify the covered employee, who may

Title: Employee Grievance	SCDJJ Policy No.: 223	Originator: Employee Relations Manager	Page: 5 of 8
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then continue the grievance to Step Two as indicated below in section B.

6. Step One Conference

The Department's OHR Associate Deputy, or other designated official, will schedule a conference to occur between the covered employee's executive manager/deputy director and the covered employee within five (5) calendar days. Both parties will be notified in writing of the date, time, and location of the conference. (Form 223C) At the conference with the covered employee's executive manager/deputy director, the covered employee will have an opportunity to present their position regarding the grievance. The executive manager/deputy director may conduct appropriate investigations and fact findings to determine whether to accept, reject, or modify the disciplinary action taken against the covered employee. The covered employee will be advised of the executive manager/deputy director's decision in writing within five (5) calendar days of the conference.

B. Step Two

1. To continue the grievance, the covered employee must notify the Department's Executive Director or a designee in writing. The request to continue the grievance must be received, or, if mailed, postmarked within five (5) calendar days after efforts to resolve the grievance in mediation have failed or after receiving the Step One Conference decision.
2. The Executive Director or a designee must promptly schedule and conduct a conference with the covered employee, normally within five (5) calendar days. Both parties will be notified in writing of the date, time, and location of the conference. (Form 223D) The covered employee will be provided an opportunity at this time to present his position regarding the grievance. The Executive Director or a designee may conduct appropriate investigations and fact findings to determine whether to accept, reject, or modify the disciplinary action taken against the covered employee.
3. The Executive Director or a designee must advise the covered employee of the decision in writing within five (5) calendar days of the conference. This decision will be final within the Department.
4. Failure by the Department to issue a final decision within 45 calendar days from the date the grievance is initially filed with the Department is considered an adverse decision.

**GENERAL INFORMATION**

Failure by the covered employee to comply with the internal timeframes in the Department

Title: Employee Grievance	SCDJJ Policy 223 No.:	Originator: Employee Relations Manager	Page: 6 of 8
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grievance procedure constitutes a failure to exhaust administrative remedies and waives the covered employee's right to further continue the grievance. The internal timeframes of the Department grievance procedure and the 45-calendar day period for action by the Department may not be waived except by mutual written agreement of both parties.

The Act provides that a covered employee has the right during the grievance and appeal process to a representative, which may include legal counsel. If the covered employee chooses to exercise the right of legal counsel, it shall be at his expense.

- A. A covered employee may receive advice concerning their options, rights and responsibilities, and grievance process, from the Department's ERO in OHR. Covered employees who are on duty must receive permission from their supervisor when leaving their place of employment and/or duty assignment to obtain assistance. Supervisors will accommodate to the extent possible the scheduling of employee meetings with the ERO.
- B. An SCDJJ employee will not investigate, interview witnesses, review documents, prepare their grievance, or discuss their grievance with any youth or staff during their assigned work hours. The employee may request annual leave or earned compensatory time to conduct investigations, interviews, preparation, or discussion. Failure to observe this prohibition may give rise to further disciplinary action.
- C. If a covered employee requests another SCDJJ employee to represent them, the employee representative cannot be pressured to accept this duty. No employee who accepts this duty shall be disciplined or otherwise prejudiced in employment for exercising their rights to represent another employee.
- D. The SCDJJ employee representative may use their work time to represent another employee but may not use their work time to prepare the case. If the absence of the selected employee representative would cause undue hardship on the representative's work unit, any supervisor within their chain of supervision may object to their representing the employee. If disputed, the responsible executive manager/deputy director will determine whether the particular requested representative would be released from their work duties to represent the employee.
- E. Employees within SCDJJ's OHR, Legal Office, or the Inspector General's Office may not serve as employee representatives.
- F. An employee or their representative may request records, reports, and documents relating to the grievance action with the Department to the ERO.
- G. An employee or their representative will make reasonable efforts to interview employees when both are not at work.

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- H. If an employee must be interviewed during their scheduled work hours, the grievant or their representative must seek and obtain permission to do so from the executive manager of the employee to be interviewed. An employee of this Department wishing to assist an employee with their grievance will not do so while on duty without approval.
- I. Scheduling of appointments must not disrupt or interfere with the employee's work schedule or the work schedule of fellow employees.

**APPEALS TO THE STATE HUMAN RESOURCES DIRECTOR**

The Act also provides for an appeal of a grievance beyond the Department to the State Human Resources Director after all administrative remedies to secure relief within the Department have been exhausted. A covered employee has not exhausted administrative remedies to secure relief within the Department until the Department's internal grievance process is completed or the 45 calendar days provided for the Department to issue a decision have elapsed, whichever occurs sooner.

Any covered employee who has complied with the Department's internal grievance process may appeal the decision of the Executive Director or a designee. Such appeal must be in writing and submitted to the State Human Resources Director within ten (10) calendar days of receipt of the Department's final decision or 55 calendar days from the initial date the grievance was filed within the Department, whichever occurs later. As to the 55 calendar days, the Act provides that a covered employee may appeal directly to the State Human Resources Director in the event the Department does not complete its entire internal grievance procedure within 45 calendar days from the time the grievance is initially filed within the Department. Failure by the Department to issue a final decision within this 45-calendar day period is considered an adverse decision and allows the covered employee to proceed with an appeal to the State Human Resources Director after 45 calendar days, but no later than 55 calendar days from the initial date the grievance was filed within the Department. The timeframes related to filing an appeal with the State Human Resources Director may not be waived.

Failure by the covered employee to file an appeal within the timeframes referenced in this section shall constitute a waiver of the right to appeal.

**RELATED FORMS AND ATTACHMENTS:**

- Form 223A, Grievance Review Request
- Form 223B, Notification of Receipt of Grievance Request
- Form 223C, Notification of Step One Grievance Conference
- Form 223D, Notification of Step Two Grievance Conference

**REFERENCED POLICIES:**

n/a

Title: Employee Grievance	SCDJJ Policy No.: 223	Originator: Employee Relations Manager	Page: 8 of 8
09/21/2021 Approval Date	SIGNED/ Heather Keever State Office of Human Resources Representative		

**SCOPE:**

This policy applies to all covered SCDJJ employees.

**STANDARD OPERATING PROCEDURES:**

n/a

**TRAINING REQUIREMENT:**

All covered employees are required to review this policy.

**UPDATED:**

July 15, 2022, Formatting of form numbers corrected

December 22, 2021, "juvenile" changed to "youth" where possible

# **Exhibit 17**

The information contained in this e-mail message may be attorney-client privileged, attorney work product, or strictly confidential information. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of the communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone at (803) 771-4400 and permanently delete this e-mail.

-----Original Message-----

From: Keever, Heather <Heather.Keever@admin.sc.gov>  
Sent: Monday, March 6, 2023 11:57 AM  
To: Gene Matthews <GMatthews@RichardsonPlowden.com>  
Cc: MJ Wilson <mwilson@richardsonplowden.com>; carwane michael <mcawane@yahoo.com>; Borchers, Amanda <Amanda.Borchers@admin.sc.gov>  
Subject: Carwane v. DJJ Hearing Continuance Request (Please Respond)  
Importance: High

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Mr. Matthews,

Please see Mr. Carwane's request below to continue the hearing scheduled for March 9, 2023 so that Mr. Carwane can seek assistance through the Administrative Law Court in enforcing subpoenas issued by the State Employee Grievance Committee Chairperson in this matter.

Please provide any response you have to this request by noon tomorrow (March 7, 2023).

Sincerely,  
Heather Keever  
Program Manager, Alternative Dispute Resolution

The South Carolina  
Department of Administration  
8301 Parklane Road, Suite A220, Columbia, SC 29223  
803-896-5088 (office)  
803-917-1198 (cell)  
Lead.Collaborate.Innovate.

-----Original Message-----

From: carwane michael <mcawane@yahoo.com>  
Sent: Monday, March 6, 2023 11:49 AM  
To: Borchers, Amanda <amanda.borchers@admin.sc.gov>; Keever, Heather <heather.keever@admin.sc.gov>  
Subject: [External] Michael Carwane grievance review hearing

Hello, I am now requesting formally that the grievance review hearing be rescheduled/ postponed. As discussed on the phone last week, I was willing to wait through Friday before taking action, since the subpoenas themselves called for responses until that date. I have not received requested records from any of the four sent subpoenas. I did forward the SCDJJ subpoena that was refused by Attorney Sara Bunge to Attorney Gene Matthews. I did not subsequently receive those records from him. I regret having to ask for this postponement, as I was motivated to have a prompt grievance process, but I cannot proceed while these organizations ignore my requests for Discovery in their attempt to disguise the Truth of what has happened in my case. If this request needs to be sent elsewhere, please provide me with that information and/or forward the request. Please also provide a confirmation, so there is no confusion regarding the initial date hearing expectations. I am in contact with the Administrative Law Court today to take a next step with the issue of the failed agency subpoena responses. Thank You for your assistance, Michael Carwane.

---

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# **Exhibit 18**



Freddie B. Pough  
Executive Director

P.O. Box 21069  
Columbia, SC 29221-1069

Henry McMaster  
Governor

djj.sc.gov



**DATE:** March 9, 2021

**TO:** Dececo Sampay Johnson *DSJ*  
Management Review Administrator

**FROM:** Troy Suber *TS*  
Management Review Specialist

**SUBJECT:** Administrative Inquiry: Psychological/Emotional Abuse  
Event #20-102672 IN#19336  
Location: Saluda County Office  
Staff: Michael Carwane, Intensive Supervision Officer  
Subject: Sandra Callahan, Saluda County Manager

**Introduction:**

According to the Event Report dated December 10, 2020, Senior Advisor and General Counsel Elizabeth Hill requested that the Office of Investigative Services open an investigation due to concerns expressed to her by ISO Michael Carwane. Management Review Administrator Dececo Johnson assigned this case to Management Review Specialist (MRS) Troy Suber to investigate.

**Findings:**

- **On January 6, 2021, ISO Michael Carwane was interviewed and provided the following information: He alleges his supervisor contacted local law enforcement to conduct surveillance on his activities. He believes this retaliation is due to him filing a formal complaint. The vehicles used to watch him were unmarked law enforcement vehicles but once he noticed a non-law enforcement vehicle watching him. Carwane listed no witnesses for this case.**

Event # 20-102672 IN19336  
 March 9, 2021  
 Page 2 of 4

On January 19, 2021, Sandra Callaham was read the Administrative Inquiry Advisement, acknowledged the contents, was interviewed via phone \_\_\_\_\_ and provided the following information: She denied having law enforcement follow Carwane to conduct surveillance at any time since she has been supervising him.

- Carwane alleges Callaham recorded their conversations during meetings without his knowledge. Carwane claims the phone policy states that potential violations are to be criminally investigated. He believes Human Resources violated that policy when they did not forward his formal complaint to Investigative Services for a criminal investigation.

On January 19, 2021, Sandra Callaham was interviewed via phone ( \_\_\_\_\_ and provided the following information: She denied recording any conversations with Carwane.

On February 2, 2021, Chief Criminal Investigator James Flowers was interviewed and provided the following information: He did not see any evidence to support the fact that there was an actual recording of conversations between the employees. Furthermore, if a recording did exist, it would not be criminal if the person making the recording was a party to the conversation. Therefore, there were no criminal actions in this case.

On February 23, 2021 Norberto Perez of Human Resources was interviewed and provided the following information: He did not forward this case for criminal review because in his opinion he did not feel it was a criminal case.

- Carwane alleges surveillance equipment was installed in the county office in order to spy on him.

On January 19, 2021, Callaham was interviewed via phone \_\_\_\_\_ and provided the following information: She stated a camera was installed in the building by the county but denied having access to the camera. Callaham could only request footage from the county, which she did not do. Specifically, half of the building is shared between DJJ and the

Event # 20-102672 IN19336  
 March 9, 2021  
 Page 3 of 4

county. There was a period where cameras were installed to the exterior of the building because of complaints that someone was putting screws underneath the employee's vehicles.

On January 19, 2021 [REDACTED] from the IT Department was interviewed and provided the following information: There is no way Callahan could hack DJJ's equipment. He stated he would know because he personally deals with this as a part of his job.

- Carwane alleges the paperwork for him to transfer to a Lexington ISO position (a position he declined that has since been rescinded) was an attempt by DJJ to demote him.

On January 19, 2021, Amahl Bennett was interviewed via phone ( [REDACTED] ) and provided the following information: The transfer offer from Saluda County to Lexington County was a lateral move, not a demotion. Carwane was keeping the same salary and pay band as he currently holds. The only change would have been location. Norberto Perez of Human Resources suggested this move since Carwane refused mediation. The move would have separated Carwane from the source of his allegation.

- Carwane alleges he requested a copy of his employee file from Human Resources. When Leslie Centeno provided him with his file, he stated documents were missing. Carwane requested a copy of his file to see his most current EPMS.

On January 19, 2021 Leslie Centeno from Human Resources was interviewed and provided the following information: Carwane was provided all documents from his personal files that he could have in his possession by policy. He was given everything that was in his paper file except for two EPMS's that was taken out in order to be scanned into HR's Team IA folder. He received those documents the same day with the rest of his file.

Event # 20-102672 IN19336  
March 9, 2021  
Page 4 of 4

**Summary of Findings:**

Michael Carwane made several allegations. The allegations involved him being under police surveillance as well as being recorded while meeting with his supervisor Sandra Callahan without his knowledge. Human Resources failing to provide him with all the paperwork from his employee file. Human Resources not forwarding his allegation for criminal review. A camera being installed in the DJJ/County office to spy on him. A lateral transfer disguised as a actual demotion.

As a result of the findings, this case is unsubstantiated for policy violations.

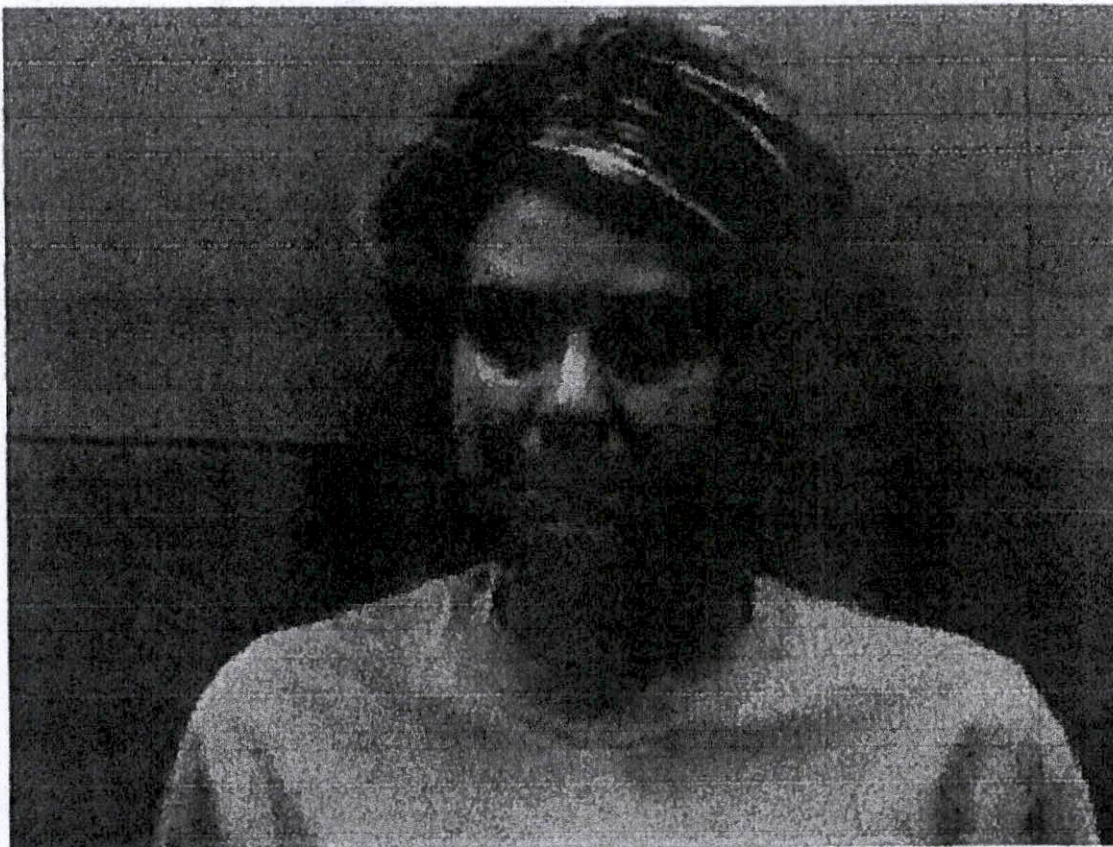
CC: Deputy Director Rhonda Holman

ADVERTISEMENT

# Warrant: Ex-DJJ employee secretly recorded conversation with iPhone

By Jason Old

Published: Nov. 14, 2013 at 10:01 PM EST | Updated: Nov. 24, 2013 at 10:01 PM EST



COLUMBIA, SC (WIS) - A former administrative assistant at the South Carolina Department of Juvenile Justice was arrested Thursday.

According to the South Carolina Law Enforcement Division, 29-year-old Leann M. Cudd of Imo was charged with wiretapping/intentional reception, use, or disclosure of any wire, electronic or oral communication.

Warrants allege Cudd secretly slid her iPhone under the closed door of the Inspector General to secretly record a conversation between two SCDJJ employees.

ADVERTISEMENT

According to a SLED news release, Cudd admitted to using her phone to record and store the conversation.

The warrant did not indicate what the conversation was about.

Cudd was booked into the Alvin S. Glenn Detention Center.

If convicted, she faces up to five years in prison and/or a fine of up to \$5,000.

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### **Neuropathy Breakthrough: The Gadget That Silenced Big Pharma**

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# **Exhibit 19**

**Motion to Compel order**

mcarwane@yahoo.../Sent



mcarwane@yahoo.com <mcarwane@yahoo.com>  
To: holmes@townofsaluda.com

Apr 23 at 4:34 PM


Dear sir,

I have previously on record two separate subpoena orders with two associated separate Motion to Compel orders for court Discovery. Your agency did not meet the deadlines set for each of those orders, without explanation. I did receive late a police incident report, then received a second copy. It was not a second copy that was required, but the full Discovery of the remaining ordered elements. To be specific, I have not been provided any video evidence collected, a listing of SCDJJ contacts (to include caller(s) that initiated police response from SCDJJ, on date of incident report), and the accompanying officer body camera footage. As my hearings on these matters are now imminent, I respectfully request an immediate response. Otherwise, I will have to seek injunctive relief and damages against your agency for its noncompliance with these prior legal orders. I have not previously named your department as a defendant, because the routine adherence to a legal process is expected of me for your department, as any reputable law enforcement agency should. I will await a prompt response. Thank you.

Sincerely, Michael Carwane pro se

**Michael Carwane subpoena and Motion to compel requests**

mcarwane@yahoo.../Sent

 carwane michael <mcarwane@yahoo.com>  
To: John Boyd <jboyd@hsblawfirm.com>

Jun 20 at 11:17 AM

Mr. John Boyd,

Hello, I was provided your email contact by Commissioner Dooley, with the Worker's Compensation Commission. She had offered to me during the last pre-hearing conversation to facilitate a meeting with you, regarding the lacking response from the Saluda Police department for my legal Subpoena and Motion to Compel requests. She is now indicating that you made the claim to her that the Saluda Police Department has responded to the request and has furnished all documents in their possession. I did receive a copy of the incident report (after the timeframe allotted for response).

However, this does not constitute a full response to the Subpoena request. The other items called for in Discovery were neither provided nor was there explanation provided to me to explain the missing materials. This is why I sought injunctive relief from Commissioner Dooley for enforcement of the full Subpoena content. My request has not changed, and I have not been provided the additional materials at this time. My email request to the Saluda Department was additionally ignored.

Please compare the original Subpoena request to the information provided for further clarity about the expected remaining materials and provide that information promptly, along with an email confirmation to this notice. Thank You.  
Sincerely, Michael Carwane

# **Exhibit 20**

## August 10, 2021

- In person while Mr. Perez was in the office. Michael asked to speak to Mr. Perez regarding any updates.
- Mr. Perez offered an opportunity as the next step, to speak to Ms. Holman although she was very busy and wasn't sure of a date to be determined.
- Michael said he would prefer a significant appointment rather than a brief check-in with Ms. Holman
- Michael physically pointed to new office video surveillance as in IG report. See State Attachment #13
- Michael described and showed Mr. Perez instances and locations for previously reported law enforcement interactions.
- During that walk-about conversation, twice Michael noted law enforcement activity immediately upon leaving the building, and then slightly after. One instance with Mr. Perez in attendance.
- This was the first date that Mr. Perez had seen examples of the things as reported in the IG investigation, which were factual and extrapolated as paranoia, and had not been previously investigated. Michael did not state that he, himself was paranoid, as reported by Mr. Perez.

SENDER COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Saluda Police Department  
 101 S Jefferson St  
 Saluda SC 29138



9590 8402 7538 2098 5399 79

2. Article Number (Transfer from service label)

7022 0410 0001 8398 1916

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

*X McLeod*

- Agent
- Addressee

B. Received by (Printed Name)

*Denise McLeod*

C. Date of Delivery

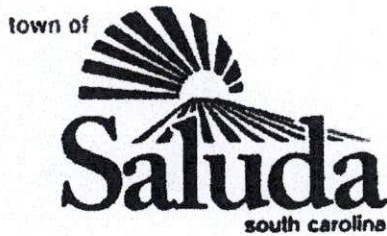
*7-17-20*

- D. Is delivery address different from item 1?  Yes
- If YES, enter delivery address below:  No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery over \$500
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

Domestic Return Receipt



100 S. Jefferson St.

Saluda, SC 29138

864.445.3522

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## **Clerk / Treasurer**

Nicole Maffett

[maffett@townofsaluda.com](mailto:maffett@townofsaluda.com)

## **Administrative Assistant**

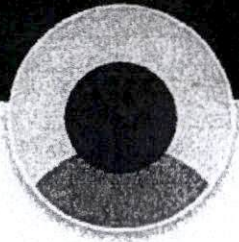
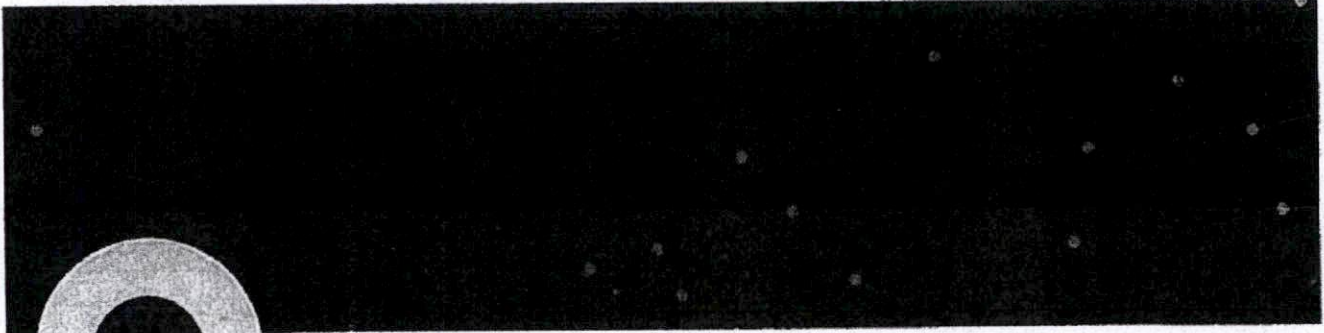
Ashley Turner

[turner@townofsaluda.com](mailto:turner@townofsaluda.com)

## **Town Attorney**

John Boyd with Haynsworth, Sinkler, Boyd, PA.

P.O. Box 11889 Columbia, SC 29211



## Nicole Maffett

Victim Advocate at Saluda Police Department

Saluda, South Carolina, United States

8 followers · 8 connections

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**Saluda Police Department**

## Experience



### **Victim Advocate**

Saluda Police Department

Jul 2017 - Present · 6 years

Saluda, South Carolina, United States



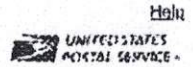
### **Victim Advocate**

Saluda County Sheriff's Office

Oct 2007 - Nov 2016 · 9 years 2 months

Saluda, South Carolina, United States

# Exhibit 21



# Product Tracking & Reporting

Home Search Reports My Mailbox My Mailbox My Mailbox My Mailbox My Mailbox My Mailbox My Mailbox My Mailbox My Mailbox My Mailbox

## USPS Tracking Intranet Tracking Number Result

Result for Domestic Tracking Number 7022 0410 0001 8398 0254

Tracking Expires On February 15, 2025

**Destination and Origin**

**Destination**

ZIP Code	City	State
292108420	COLUMBIA	SC

**Origin**

ZIP Code	City	State
291389998	SALUDA	SC

**Tracking Number Classification**

**Class/Service**

Class/Service: First-Class Certified Mail  
 Class of Mail Code/Description: FC / First Class

**Destination Address Information**

Address: 220 EXECUTIVE CENTER DR  
 City: COLUMBIA  
 State: SC  
 5-Digit ZIP Code: 29210  
 4-Digit ZIP Code add on: 8420  
 Delivery Point Code: 99  
 Record Type Code: Building/Apartment

**Origin / Return / Pickup Address Information**

Address:  
 City:  
 State:  
 5-Digit ZIP Code: 29138  
 4-Digit ZIP Code add on: 9998

**Service Delivery Information**

Service Performance Date: Expected Delivery by: Friday, 02/17/2023  
 Delivery Option Indicator: 1 - Normal Delivery  
 Zone: 01  
 PO Box: N  
 Other Information: [Service Calculation Information](#)

**Payment**

Payment Type: Other Postage  
 Payment Account Number: 000000000000  
 Postage: \$0.63  
 Weight: 0 lb(s) 1.00 oz(s)  
 Rate Indicator: Single Piece - Letters

**Other Information**

Related Product: [9590 9402 7538 2098 5396 72](#)

[Agent Information](#)

[Request Internal USPS Tracking Plus Statement](#)

**Extra Services**

**Extra Services Details**

Description	Amount
Certified Mail	
Certified Mail Restricted Delivery	\$10.80

**Events**

Event	Event Code	Event Date	Event Time	Location	Event Type	Barcode	Carrier	Package Status	Other Information
REFUSED	04	02/23/2023	08:08	COLUMBIA, SC 29210	Scanned	IMD 18248D8137 (interface type - wireless)	Scanned by route 00000000	02/23/2023 07:10:05	Request Delivery Record
2ND NOTICE GENERATED	VF	02/22/2023	03:16	COLUMBIA, SC 29210	Customer Driven Activity			02/22/2023 03:58:12	
AVAILABLE FOR PICKUP	14	02/17/2023	09:45	COLUMBIA, SC 29221	Scanned	MIO 15170D835D (interface type - wireless)	Scanned by route 01234567	02/17/2023 08:57:07	
ARRIVAL AT UNIT	07	02/17/2023	09:45	COLUMBIA, SC 292109998	Scanned	MIO 15170D835D (interface type - wireless)	Scanned by route 01234567	02/17/2023 08:57:10	PC: OF Reason Code OFD Same Day
OUT FOR DELIVERY	OF	02/17/2023	08:46	COLUMBIA, SC 29210	System Generated			02/17/2023 07:52:08	
SORTING/PROCESSING COMPLETE	PC	02/17/2023	08:38	COLUMBIA, SC 29210	System Generated			02/17/2023 07:52:06	
ARRIVAL AT UNIT	07	02/17/2023	08:35	COLUMBIA, SC 292109998	Scanned	IMD 18322D80A7 (interface type - wireless)	Scanned by route 00000000	02/17/2023 07:52:04	OFD Same Day
ENROUTE/PROCESSED	10	02/16/2023	23:40	COLUMBIA, SC 29201	Scanned	DBCS-013	Destined to route 29210842099	02/16/2023 22:47:05	
IN TRANSIT TO NEXT FACILITY	NT	02/16/2023	18:02		System Generated			02/16/2023 17:17:00	
ENROUTE/PROCESSED	10	02/15/2023	20:02	COLUMBIA, SC 29201	Scanned	DROSS-005	Destined to route 29210842099	02/15/2023 19:19:07	
ENROUTE/PROCESSED	10	02/15/2023	19:10	COLUMBIA, SC 29201	Scanned	AFCS200-003		02/15/2023 18:27:04	
ENROUTE/PROCESSED	10	02/15/2023	19:09	COLUMBIA, SC 29201	Scanned	AFCS200-003		02/15/2023 18:27:04	
DEPART POST OFFICE	SF	02/15/2023	16:17	SALUDA, SC 29138	System Generated			02/15/2023 16:14:07	Closeout Label ID: C113 8055 5009 2302 *54 0102 000
ACCEPT OR PICKUP	03	02/15/2023	12:54	SALUDA, SC 281389998	Scanned	RSS POS	Destined to route C053	02/15/2023 12:29:04	Facility Finance Number: 457820

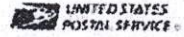
Enter up to 35 items separated by commas.

Select Search Type

Quick Search

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# Product Tracking & Reporting



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## USPS Tracking Intranet Tracking Number Result

Result for Domestic Tracking Number 7021 0950 0000 3954 7093

Tracking Expires On  
January 31, 2025

Destination and Origin		
<b>Destination</b>		
ZIP Code	City	State
292013002	COLUMBIA	SC
<b>Origin</b>		
ZIP Code	City	State
291389998	SALUDA	SC

Tracking Number Classification	
<b>Class/Service</b>	
Class/Service:	First-Class Certified Mail
Class of Mail Code/Description:	FC / First Class
<b>Destination Address Information</b>	
Address:	1310 GADSDEN ST
City:	COLUMBIA
State:	SC
5-Digit ZIP Code:	29201
4-Digit ZIP Code add on:	3002
Delivery Point Code:	10
Record Type Code:	Street Record
Delivery Type:	Business, Other
<b>Origin / Return / Pickup Address Information</b>	
Address:	
City:	
State:	
5-Digit ZIP Code:	29138
4-Digit ZIP Code add on:	9998
<b>Service Delivery Information</b>	
Service Performance Date:	Expected Delivery by: Thursday, 02/02/2023
Delivery Option Indicator:	1 - Normal Delivery
Zone:	02
PO Box:	N
Other Information	<a href="#">Service Calculation Information</a>
<b>Payment</b>	
Payment Type:	Other Postage
Payment Account Number:	00000000000
Postage:	\$0.63
Weight:	0 lb(s) 1.00 oz(s)
Rate Indicator:	Single Piece - Letters
<b>Other Information</b>	
Related Product:	<a href="#">9580 9402 7371 2028 2250 23</a>
<a href="#">Agent Information</a>	

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Request Internal USPS Tracking Plus Statement

Extra Services

Extra Services Details

Description	Amount
Certified Mail	
Certified Mail Restricted Delivery	\$10.80

Events

Event	Event Code	Event Date	Event Time	Location	Report Method	Source ID	Carrier	Facility	Date / Time	Other Information
PACKAGE RETURN NOTICE GENERATED	VS	02/18/2023	03:12	COLUMBIA, SC 29201	Customer Driven Activity				02/18/2023 03:43:24	Request Delivery Record
2ND NOTICE GENERATED	VF	02/08/2023	03:24	COLUMBIA, SC 29201	Customer Driven Activity				02/08/2023 03:58:09	
NO AUTHORIZED RECIPIENT AVAILABLE	56	02/03/2023	15:14	COLUMBIA, SC 29201	Scanned	MDD TR C171A09678 (interface type - wireless)	Scanned by route 9201C024		02/03/2023 14:23:07	3849 ID: 5292062370161723 GEO Location Data Available
AWAITING DELIVERY SCAN	DX	02/02/2023	00:10	COLUMBIA, SC 29201	System Generated				02/02/2023 23:23:04	
OUT FOR DELIVERY	OF	02/02/2023	06:10	COLUMBIA, SC 29201	System Generated				02/02/2023 06:27:09	
SORTING/PROCESSING COMPLETE	PC	02/02/2023	06:00	COLUMBIA, SC 29201	System Generated				02/02/2023 06:27:06	
ARRIVAL AT UNIT	07	02/02/2023	05:45	COLUMBIA, SC 292019998	Scanned	IMD 18243D8105 (interface type - wireless)	Scanned by route 04566802		02/02/2023 06:05:07	OFD Same Day
ENROUTE/PROCESSED	10	02/02/2023	01:34	COLUMBIA, SC 29201	Scanned	DHOSS-016	Destined to route 29201300210		02/02/2023 00:38:06	Container ID: 292012290112734311547112
IN TRANSIT TO NEXT FACILITY	NT	02/01/2023	18:53		System Generated				02/01/2023 18:04:05	
ENROUTE/PROCESSED	10	01/31/2023	18:53	COLUMBIA, SC 29201	Scanned	DHOSS-006	Destined to route 29201300210		01/31/2023 18:04:06	Container ID: 292012424112737311060824
ENROUTE/PROCESSED	10	01/31/2023	17:54	COLUMBIA, SC 29201	Scanned	AFCS200-002			01/31/2023 16:59:03	
DEPART POST OFFICE	SF	01/31/2023	16:10	SALUDA, SC 29138	System Generated				01/31/2023 15:28:04	Closeout Label ID: CT1309555000230131151639009
ACCEPT OR PICKUP	03	01/31/2023	13:00	SALUDA, SC 291389998	Scanned	RSS POS	Destined to route C043		01/31/2023 12:28:02	Facility Finance Number: 457820

Enter up to 35 items separated by commas.

Select Search Type: Quick Search

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Version: 23.2.2.0.35

# **Exhibit 22**

AGENCY I.D.  
SC0410100

INCIDENT REPORT  
SALUDA POLICE DEPARTMENT

CASE NUMBER  
**210900231-T**

N/C  
INQ. ENTD.

EVENT	INCIDENT TYPE	COMPLETED	FORCED ENTRY	PREMISE TYPE	UNITS ENTERED	TYPE VICTIM
	1. NRP - INFORMATION ONLY/ ASSISTING EMS	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO			<input type="checkbox"/> Individual <input type="checkbox"/> Business <input type="checkbox"/> Financial Ins <input type="checkbox"/> Government <input type="checkbox"/> Relig. Orgn. <input type="checkbox"/> Soc./Public <input type="checkbox"/> Other <input type="checkbox"/> Unknown <input type="checkbox"/> Police Off
	2.	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO			
	3.	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO			

INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER)  
**120 MAIN ST., SALUDA, SC**

ZIP CODE: **29138-** WEAPON TYPE:

INCIDENT DATE	24 HR. CLOCK	TO	DATE	24 HR. CLOCK	DISPATCH DATE/TIME	ALIVE CLOCK	LOCATION NO.
09/01/2021	15:36		09/01/2021	16:06	09/01/2021	15:36	
				DISPATCH DATE/TIME		DEPART. TIME	
				15:42		16:05	

COMPLAINANT'S NAME (LAST, FIRST, MIDDLE): **CARWANE, MICHAEL ROBERT**

RELATIONSHIP TO SUBJECT: #1 #2 #3

RESIDENT:  RACE: **W** SEX: **M** AGE: **51** ETH: **U**

HOME PHONE: DE EMPLOYER PHONE: DE

ADDRESS: **302 THE HEIGHTS 3RD AVE** CITY: **Saluda** STATE: **SC** ZIP CODE: **29138-** LOCATION NO.

VICTIM'S NAME (LAST, FIRST, MIDDLE):

RELATIONSHIP TO SUBJECT: #1 #2 #3

RESIDENT:  RACE: **J** SEX: **S** AGE: **O** ETH: **U**

HOME PHONE: DE EMPLOYER PHONE: DE

HEIGHT: WEIGHT: HAIR: EYES: FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES ETC.

ADDRESS: CITY: STATE: ZIP CODE: LOCATION NO.

VISIBLE INJURY (VICT. 1)  YES  NO  EXPLAIN -

VICTIM (NO. 1): NONE  USING: ALCOHOL  DRUGS  TYPE: COMPLAINT OF NON-VISIBLE INJURIES:  YES  NO

TWO-MAN VEH.  ONE-MAN VEH.  DETECTIVE/SPL ASMT.  OTHER  ALONE  ASSISTED  \* J - This Jurisdiction S - State O - Out of State U - Unknown

**SUBJECT NO. 1**

SUSPECT NAME (LAST, FIRST, MIDDLE): RACE: SEX: AGE: ETH: DATE OF BIRTH: HEIGHT: WEIGHT: HAIR: EYES:

RUNAWAY

WANTED

WARRANT

ARREST

JAIL

SUMMONS

SUBJECT (NO. 1) USING: ALCOHOL  COMPUTER EQUIP  ARRESTED NEAR OFFENSE SCENE  YES  NO  DATE/TIME OF OFFENSE: **09/01/2021 15:36** DATE/TIME OF ARREST:

DRUGS  NONE  TOTAL # ARRESTED: **0**

**NARRATIVE**

ON THE ABOVE STATED DATE AND TIME RO WAS DISPATCHED TO THE AREA OF 102 S. MAIN ST. IN REFERENCE TO ASSISTING EMS WITH A FALL. UPON ARRIVAL RO SAW NO ONE OUTSIDE, SO SHE ENTERED THE BUILDING TO SEARCH FRO THE INJURED PARTY. WHEN RO WALKED IN, SHE SAW A WOMAN INSIDE THE DJJ OFFICE.. THE WOMAN, IDENTIFIED AS PAM HUDSON, ASKED IF RO WAS THERE IN REFERENCE TO A DISGRUNTLED EMPLOYEE. RO SAID NO AND EXPLAINED THAT SOMEONE WAS INJURED IN THE AREA AND SHE WAS TRYING TO LOCATE THEM THEN CONTINUED SEARCHING. AFTER WALKING AROUND THE OUTSIDE AND INSIDE AREAS, RO FINALLY MADE CONTACT WITH THE COMPLAINANT, MICHAEL CARWANE, INSIDE THE BUILDING, IN HIS OFFICE. CARWANE STATED THAT HE HAD STEPPED DOWN ON THE GROUND OUTSIDE AND IT GAVE WAY, ALLOWING HIM TO STEP APPROXIMATELY THIGH DEEP IN TO THE GROUND AND CAUSING HIM TO FALL. AFTER FALLING, WHICH CARWANE STATED TOOK PLACE AT APPROXIMATELY 1440 ( IT WAS THEN AFTER 1530), HE GOT IN A WORK VEHICLE, DROVE AROUND THE BLOCK, THEN CAME BACK INTO HIS OFFICE, IN AN ATTEMPT TO "WALK IT OFF" AND WAITED FOR JOHNNIE MAE HERBERT, A COWORKER. HE THEN STATED THAT HE HAD NOTIFIED A SUPERVISOR, BUT HAD NOT HEARD BACK, SO HE CALLED

JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY: JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY:

PROPERTY EST.	TYPE (OR DUP)	TOTAL VALUE
	STOLEN	
	DAMAGED	
	BURNED	
	RECOVERED	
	SEIZED	
	COUNTERFEIT	

**ADMINISTRATIVE**

SUBJECT IDENTIFIED:  YES  NO

SUBJECT LOCATED:  YES  NO

ACTIVE  ADM. CLOSED

UNFOUNDED

ARRESTED UNDER 18  EX-CLEAR UNDER 18

ARRESTED 18 AND OVER  EX-CLEAR 18 AND OVER

REASON FOR EXCEPTIONAL CLEARANCE: 1.  OFFENDER DEATH 2.  NO PROSECUTION 3.  EXTRADITION DENIED 4.  VICTIM DECLINES COOPERATION 5.  JUVENILE - NO CUSTODY

REPORTING OFFICER(S): **PD 7 - Ptm Beth Roberson** DATE: **09/02/2021** UNIT NUMBER: **PD 7** APPROVING OFFICER: DATE: UNIT NUMBER:

FOLLOW-UP INVESTIGATION OFFICER:  YES  NO

AGENCY I.D.  
SC0410100

SUPPLEMENTAL INCIDENT REPORT  
SALUDA POLICE DEPARTMENT

CASE NUMBER  
210900231-T

NCIC  
INC. ENTD.

ORIGINAL REPORT  
 MODIFIED ORIGINAL  
 SUPPLEMENTAL REPORT  
 CASE STATUS CHANGE  
 ADDITIONAL VICTIMS  
 ADDITIONAL OFFENDERS  
 ADDITIONAL STOLEN PROPERTY  
 ADDITIONAL RECOVERED PROPERTY

PAGE 2 of 3 PAGES

VICT./SUBJ. I.D. OVERFLOW	<input type="checkbox"/> COMPLAINT	NAME (LAST, FIRST, MIDDLE)	VICTIM RELATIONSHIP TO SUBJECT			RESIDENT	RACE	SEX	AGE	D.O.B.	ETH
	<input type="checkbox"/> VICTIM #	HEIGHT	WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.					
<input type="checkbox"/> SUBJECT #	ADDRESS		CITY	STATE	ZIP CODE	LOCATION NO.	HOME PHONE	EMPLOYER PHONE			
<input type="checkbox"/> RUNAWAY	<input type="checkbox"/> VICTIM NO.	VISIBLE INJURY: <input type="checkbox"/> NO <input type="checkbox"/> YES	COMPLAINT OF NON-VISIBLE INJURIES <input type="checkbox"/> NO <input type="checkbox"/> YES		VICTIM USING ALCOHOL: <input type="checkbox"/> <input type="checkbox"/> NONE	<input type="checkbox"/> TWO-MAN VEHICLE <input type="checkbox"/> DETECTIVE/PLASMT <input type="checkbox"/> ALONE <input type="checkbox"/> ONE-MAN VEHICLE <input type="checkbox"/> OTHER <input type="checkbox"/> ASSISTED					
<input type="checkbox"/> WANTED	EXPLAIN		DRUGS: <input type="checkbox"/>								
<input type="checkbox"/> WARRANT	SUBJECT NO.		USING: ALCOHOL <input type="checkbox"/>	DRUGS <input type="checkbox"/>	TYPE:						
<input type="checkbox"/> ARREST			COMPUTER EQUIP. <input type="checkbox"/>	NONE <input type="checkbox"/>							
<input type="checkbox"/> JAIL											
<input type="checkbox"/> SUMMONS											

NARRATIVE

TOWN HALL TO GET ASSISTANCE, WHO IN TURN NOTIFIED DISPATCH, AND R/O WAS SENT OUT. HE STATED THAT WHEN HE FELL, A COWORKER WAS WATCHING, AND THAT HE TRUSTED NONE OF HIS COWORKERS. HE THEN SAID THAT HE WAS WAITING ON HERBERT TO GET OUT OF COURT BECAUSE SHE WAS THE ONLY COWORKER HE COULD TRUST, AND THAT HE DIDN'T SEE HOW HE COULD FINISH GETTING HE BELONGINGS FROM THE OFFICE BY THE END OF THE DAY. WHILE HE WAS SPEAKING, EMS EXAMINED CARWANE, INCLUDING WATCHING HIM WALK ABOUT PUTTING WEIGHT ON HIS LEG.. EMS STATED TO CARWANE THAT THEY SAW NOTHING WORRISOME, BUT COULDN'T BE SURE WITHOUT SOMEONE WITH AND X-RAY MACHINE EXAMINING. AS RO WAS WATCHING EMS EXAMINE CARWANE, SHE NOTICED THAT THERE WERE NO NOTICIBLE ABRASIONS, BRUISES, OR MARKS THAT SHE COULD SEE. ALSO , THERE WAS NO NOTICIBLE DIRT ON HIS PANTS, LEG, SOCKS, OR SHOES, IN SPITE OF CARWANE SAYING THAT HIS SHOE

VEH./GUN/ECT	STATUS	TYPE	VIN AND/OR LICENSE NO.		BOAT HULL NO. AND/OR REG. NO.		
	<input type="checkbox"/> STOLEN	<input type="checkbox"/> VEHICLE	SERIAL AND/OR OWNER APPLIED NO.		STATE		
	<input type="checkbox"/> RECOVERED	<input type="checkbox"/> GUN	YEAR OF REGISTRATION	YEAR OF EXPIRATION	YEAR	MAKE	TYPE
	<input type="checkbox"/> FOUND	<input type="checkbox"/> BOAT	MODEL	STYLE	COLOR	BRAND NAME	CALIBER
	<input type="checkbox"/> TOWED	<input type="checkbox"/> LICENSE PLATE	NC NO.	DENOMINATION		ISSUER	SECURITIES DATE
	<input type="checkbox"/> SUSPECT	<input type="checkbox"/> SECURITIES/BONDS, STOCKS	MISCELLANEOUS				
<input type="checkbox"/> VICTIM	<input type="checkbox"/> ARTICLE						

PROPERTY EST.	TYPE (GROUP)					TOTAL VALUE
	STOLEN					
	DAMAGED					
	BURNED					
	RECOVERED					
	SEIZED					
COUNTERFEIT						

SUBJECT IDENTIFIED  YES  NO  
 SUBJECT LOCATED  YES  NO  
 ACTIVE  ADM. CLOSED  
 UNFOUNDED  
 ARRESTED UNDER 18  
 EX-CLEAR UNDER 18  
 ARRESTED 18 AND OVER  
 EX-CLEAR 18 AND OVER  
 VICTIM DECLINES COOPERATION  
 JUVENILE - NO CUSTODY

REASON FOR EXCEPTIONAL CLEARANCE: 1.  OFFENDER DEATH 2.  NO PROSECUTION 3.  EXTRADITION DENIED 4.  VICTIM DECLINES COOPERATION 5.  JUVENILE - NO CUSTODY

REPORTING OFFICER(S) PD 7 - Ptm Beth Roberson DATE 09/02/2021 UNIT NUMBER PD 7 APPROVING OFFICER DATE UNIT NUMBER

FOLLOW-UP INVESTIGATION OFFICER  YES  NO

AGENCY I.D.  
SC0410100

SUPPLEMENTARY INCIDENT REPORT  
SALUDA POLICE DEPARTMENT

CASE NUMBER  
210900231-T

NCIC  
INQ. ENTO.

<input type="checkbox"/> ORIGINAL REPORT	<input type="checkbox"/> SUPPLEMENTAL REPORT	<input type="checkbox"/> ADDITIONAL VICTIMS	<input type="checkbox"/> ADDITIONAL STOLEN PROPERTY	PAGE <u>3</u> of <u>3</u> PAGES
<input type="checkbox"/> MODIFIED ORIGINAL	<input type="checkbox"/> CASE STATUS CHANGE	<input type="checkbox"/> ADDITIONAL OFFENDERS	<input type="checkbox"/> ADDITIONAL RECOVERED PROPERTY	

NARRATIVE

CAME HALF OFF WHILE PULLING HIS FOOT OUT OF THE HOLE WITH LOOSE MOIST DIRT. AFTER DISCUSSING THE MATTER WITH HERBERT, CARWANE DECIDED TO HAVE EMS TRANSPORT HIM TO A HOSPITAL TO GET X-RAYS. RO WALKED AWAY FROM CARWANE'S OFFICE AND WAS APPROACHED BY MARY JO SHULL. SHULL ASKED IF HE (CARWANE) WAS INJURED BECAUSE HE HAD WALKED IN FRONT OF HER DOOR, EN ROUTE TO THE RESTROOM, TWICE SINCE LUNCH (1430 ACCORDING TO CARWANE), AND NEITHER TIME WAS HE LIMPING OR SHOWING ANY SIGNS OF A LEG INJURY. RO WENT OUTSIDE TO LOOK AT THE HOLE. THE HOLE WAS FILLED WITH DARK, MOIST, LOOSE DIRT, AND APPEARED TO BE SLIGHTLY OVER ANKLE HIGH IN DEPTH. RO PLACE A CONE IN THE HOLE AND CLEARED FROM THE SCENE.

ADMINISTRATIVE

SUBJECT IDENTIFIED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	SUBJECT LOCATED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<input checked="" type="checkbox"/> ACTIVE <input type="checkbox"/> ADM. CLOSED <input type="checkbox"/> UNFOUNDED	<input type="checkbox"/> ARRESTED UNDER 18 <input type="checkbox"/> ARRESTED 18 AND OVER	<input type="checkbox"/> EX-CLEAR UNDER 18 <input type="checkbox"/> EX-CLEAR 18 AND OVER
REASON FOR EXCEPTIONAL CLEARANCE: 1. <input type="checkbox"/> OFFENDER DEATH 2. <input type="checkbox"/> NO PROSECUTION 3. <input type="checkbox"/> EXTRADITION DENIED 4. <input type="checkbox"/> VICTIM DECLINES COOPERATION 5. <input type="checkbox"/> JUVENILE - NO CUSTODY				
REPORTING OFFICER(S) PD 7 - Ptm Beth Roberson	DATE 09/02/2021	UNIT NUMBER PD 7	APPROVING OFFICER	DATE
FOLLOW-UP INVESTIGATION OFFICER <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				

# Incident Images

## SALUDA POLICE DEPARTMENT

Incident Number:  
210900231-T

Incident Date:  
09/01/2021

Location Of Incident:  
120 MAIN ST.

Primary Victim:

Primary Offense:  
NRP - INFORMATION ONLY/ ASSISTING EMS



#1: IMG\_2521.jpg



#2: IMG\_2520.jpg



#3: IMG\_2519.jpg



#4: IMG\_2518.jpg



#5: IMG\_2517.jpg

360

# Exhibit 23



## OFFICE OF THE COUNTY COUNCIL

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February 27, 2023

In the matter of:

Michael Carwane vs SC Department of Juvenile Justice

TO: Michael Carwane and Chairperson of State Employee Grievance Committee

FROM: Sandra G. Padget, Saluda County Administrator

1. There are no requests on file in reference to this directive.
2. There is no video footage in reference to this directive.

Respectfully submitted,

*Sandra G. Padget*  
Sandra G. Padget

Saluda County Administrator  
400 West Highland Street  
Saluda, South Carolina 29138

**Clarified Response to Subpoena to Saluda County, SC**

mcarwane@yahoo.../Inbox



Ginny Bozeman <gbozeman@popelynn.com>  
To: mcarwane@yahoo.com <mcarwane@yahoo.com>

Mar 7 at 10:41 AM

Dear Mr. Carwane,

In follow up to our phone conversation, I looked into the requests made in the attached subpoena. Below, I have restated your requests and written Saluda County's response in bold. The below responses are consistent with the information Saluda County previously provided to you. It does not have any records or videos that are responsive to the information sought in your subpoena.

1. Copies of all records (to include purchase and installation invoices and SCDJJ equipment requests) for additions/changes to building video monitoring equipment from 2019 to present, in or about the county building located at 120 South Main Street, Saluda, SC 29138.

**Saluda County is not in possession of any records that are responsive to this request.**

2. Copies of the recorded video footage of the building (120 South Main Street, Saluda, SC 29138) entrance/interior for the following times:
  1. June 3, 2021 from 2:00 PM until 3:00 PM
  2. July 15, 2021 from 8:15 AM until 9:00 AM
  3. September 1, 2021 from 2:15 PM until 4:30 PM

**Saluda County is not in possession of any records that are responsive to this request.**

Based on my conversation with you, it is my understanding that similar requests have been made via subpoena to other governmental entities. This is Saluda County's response to the subpoena sent to it. It cannot speak for, is not in possession of, and does not have access to the records maintained by other entities.

Sincerely,

Ginny Bozeman  
OF COUNSEL

DIRECT: (803) 354-4947  
CELL: (901) 299-8667  
FAX: (803) 354-4899

poped@nn.com



POPE FLYNN  
GROUP

1411 Gervais St.  
Suite 300  
Columbia, SC 29201

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1 File 40.2kB



M. Carwane Subpoena.pdf  
40kB

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# Exhibit 24

**SOUTH CAROLINA DEPARTMENT OF JUVENILE JUSTICE**

**Employee Complaint Form  
(Please type or print all information)**

Employee Name: Michael Carwane			Office/Facility: Tri-County DJJ office		
Position Title: ISO			Name of Immediate Supervisor: Amahl Bennett		
Employee Work Phone #: 803-430-3522					
Statement of Complaint: <i>(Be specific—sexual harassment, discrimination)</i> Retaliation for prior Human Resources Complaints, Bullying, Harassment, Obstruction					
Name of Person(s) Accused of Wrongdoing: Sandra Callaham, (to include possible actions for Pam Hudson, Amahl Bennett)			Date and Time of Incident(s): Approximately 2:34 pm, Sept 1, 2021		
Name(s) of Witnesses: Amahl Bennett, Johnnie Mae Herbert					
Description of Incident: <i>[Describe actions of all person(s) involved, including yourself. Use additional sheets if required.]</i> See attached documents to include unanswered email copy sent to Amahl Bennett					
Requested Action: <i>(check one)</i>					
<input type="checkbox"/> No action requested at this time. Retain complaint on file. <input type="checkbox"/> An informal review/investigation of this complaint. <input checked="" type="checkbox"/> A formal review/investigation of this complaint.					
Signature of Employee: Michael Carwane			Date: September 9, 2021		
<i>The signature and date below signify the date received at OHR and by whom received.</i>					
Printed name of OHR official:		Signature of OHR official:		Date received (print or stamp):	

The South Carolina Department of Juvenile Justice is an equal opportunity employer. DJJ does not discriminate in hiring, promotions, discharge, pay, fringe benefits, job training, classification, referral or in any other aspects of employment on the basis of race, color, religion, sex, participation in protected activity in the workplace, disability, age or national origin. Any act you feel is in violation please contact the Office of Human Resources, 2007 Willow Lane, 4900 Broad River Road, Columbia, SC 29212-5413 (803) 896-4733. The South Carolina Department of Juvenile Justice's School District also does not discriminate in any programs or activities on the basis of race, color, national origin, sex, religion, participation in protected activity in the work place, disability or age. The following offices have been designated to handle inquiries regarding the school district's nondiscrimination policies: Title IX - Inspector General's Office - 3208 Broad River Road, Columbia, SC 29210-5427 - Ph: 803-896-9595; 504 Special Education Office, 1830 Shivers Road, Columbia, SC 29210-5416 - Ph: 803-896-8484.

I returned to the Saluda office from my lunch break at approximately 2:29 PM. I proceeded to check out the state vehicle key as planned for use of the vehicle. When outside approaching the vehicle on the sidewalk, I was injured falling into a section of sidewalk that collapsed into a sinkhole. I was not immediately sure of the extent of my injuries, and tried to self-check and "walk it off". I did move the vehicle around the block to position it for loading as intended. However, by this time I was in more pain from the fall. I attempted to phone supervisor Amahl Bennett before I reentered the building, but did not get through to him. I returned to my office with the intent to alert my trusted co-worker Johnnie Mae Herbert about the incident, but realized she was in a closed virtual court call, and chose not to interrupt. I sought a contact number for supervisor, Jen Clark, but received a return call from Amahl prior to finding that number. Amahl stated that he had just gotten off the phone with Pam Hudson, when he saw that I tried to contact him. I advised Amahl of the situation, and indicated that my perception was that Pam Hudson was watching me from the front office window at the time I was injured, but did not offer assistance. I stated to Amahl that I was concerned that I may need medical attention, but that I did not want additional workplace drama due to the injury. Amahl stated he would make a contact call to see about getting me medical help. I remained in my office, awaiting the return call from Amahl, or availability from Johnnie Mae Herbert. At 3:28 PM I called the Saluda Town Hall. I stated who I was, where I was at, and my concern about the sinkhole. I asked that someone be sent to secure the area of the sinkhole to prevent injury to other pedestrians, and for pictures to be taken of the hole for documentation. I was asked if I had contacted 911 yet. I responded that I had not and did not feel it necessary to have an ambulance, as I had already discussed with my supervisor that I was seeking medical attention. I was told that law enforcement and public works would be notified regarding the sinkhole. I agreed. I received a return phone call from Amahl Bennett at 3:30 PM letting me know that he had reported the incident, and that he was giving me the heads up to be expecting an incoming call from a nurse to discuss my injuries. I notified Amahl that I had contacted Saluda Town Hall about the sinkhole, and that I would await the nurse contact. Amahl wanted me to know that the call may come from a contact number I did not recognize. When Johnnie Mae Herbert concluded her court hearing, I invited her into my office, and told her of my situation. I asked for her discretion and support, as I was not trying to involve the entire office or bring drama to the situation. I asked Johnnie Mae to take photos of the sinkhole prior to the public works workers arriving, in case they altered or repaired the hole without first taking photos. Johnnie Mae exited my office agreeing to my request. Several minutes later Mrs. Herbert returned to my office, stating that law enforcement had been outside searching for me. I asked her to invite them to come talk to me in my office, as Town Hall had stated that the police would respond with Public works for my call about the sinkhole. I was first approached by someone in plain clothes inquiring about the location of the sinkhole and the video surveillance of my fall. I was then questioned by someone who turned out to be with an ambulance service that asked if I was going to seek medical attention. When I answered "yes" that I was (in reference to my phone conversation with Amahl), he stated that he was "going to get the stretcher" and exited before engaging me in a fuller conversation. The first officer came to the door of my office. I invited her in to have a conversation. She refused, stating she was going to stand right there. It was evident to me that the tone and type of questioning was not as a response to an injured citizen. She wanted my ID. In total I believe at least seven people had arrived at the office, and I did my best to answer their "investigative" questions as they approached me. This was humiliating, confusing, and intrusive at a time that I was trying to focus on my injuries. I was told that I was being recorded by the officer. I was told that I was not on video during the times I had reported being outside to the officer. I was asked at least six times where the hole

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was. I was asked several more times about placement of video cameras (which is not information I am provided). Near the end of the lengthy process, I was finally asked questions from a paramedic regarding my orientation (ie, what is the date, who is the President) I was questioned about why I had taken my shoe off. I was told by the Officer that I should have stayed in the hole until help arrived. When I asked for clarity about what that statement meant, I was told that "you probably caused your own injury by walking around on it". Ultimately, after satisfying the inquiries I asked Mrs. Herbert to contact Mr. Bennett on my behalf to seek a decisive answer from him about whether to proceed with the ambulance service, as they were asking for that answer. I stated to everyone that I thought it would save money, and be less dramatic for me to just travel to a doctor with the assistance of DJJ. Mrs. Herbert returned to notify me that she had been unable to contact Mr. Bennett, but that she had received direction from Sandra Callaham for me to go ahead and use the ambulance service. I agreed and followed the instruction of the ambulance professionals. Once in the hallway, about to get on the gurney that had been brought in (as I was told not to walk, after being asked several times if I could by the Professionals), Mrs. Herbert approached me with the officer that had primarily questioned me, stating that she needed to speak with the two of us in private. I questioned its urgency (as I was ready to leave, and the process had already gone on entirely too long if the focus was supposed to be on my injuries). Mrs. Herbert insisted that it was important. In private the officer was asked by Mrs. Herbert why it was that outside with her colleagues the officer was heard to be talking about me and this case as being in regards to a disgruntled employee that had been fired today at work. Mrs. Herbert asked directly for her to explain who she got that information from. The officer was non-specific, citing that she is trained to respond to calls to observe and assess the situation, and that she had gotten information from "several people". She then stated that in her past law enforcement experience that when she gets a call regarding an angry man in the workplace it is because they were fired that day. I stated plainly that I had contacted Saluda Town Hall, and that this was a call about an injured man, not an angry man. The officer was not willing to disclose any more specific information, and appeared to be trying to dismiss or cover up Mrs. Herbert's stated concern. I chose to be non-confrontational with the officer in this moment as I felt it was a non-productive setting (injured, under investigation, evasive officer, etc.) to discover the Truth of the officer's overheard comments. I ended the conversation gracefully, thanked Mrs. Herbert for having my interests in mind, and later reported to Amahl Bennett from the hospital what had transpired with the law enforcement response to Mrs. Herbert's concern. I stated to Amahl then that this was a continuation of the Bullying I had experienced since my first formal complaint against Mrs. Callaham in August 2020. I alerted Mr. Bennett to having already being Bullied and Harassed at the office earlier in the day. I notified him that an office meeting was held (with me excluded) today that was on the topic/premise of how the office would begin to operate the following day when I was gone. I specified that there was no legitimate reason I understood that would have prevented that meeting from occurring the following day to prevent the Bullying and Harassment that was intended towards me. Additionally, I questioned why it was scheduled for my final day in the office, as Amahl had stated to me first on the day he told me of the plan to transfer me to Greenwood, that he had not discussed that plan with Mrs. Callaham or others in my office. We agreed that it would be a discussion for a later time, as we wanted to remain currently focused on my immediate medical needs. Upon release from the emergency room, DJJ did not even have a plan in place for transporting me home from the hospital, leaving me stranded and unsupported outside the hospital doors. I am attaching the unanswered email that I had sent to Mr. Bennett to gain additional clarity, supervisory support, and agency intervention in regards to the Bullying I have experienced here. I want a full investigation into

the source(s) of the information provided to the law enforcement community regarding this and previous contacts made that have allowed the law enforcement community to be used as a tool for Bullying me further. I first reported this topic to Amahl Bennett and Norberto Perez in October 2020. I subsequently reported it to the DJJ legal staff Mrs. Hill. I requested that either Mr. Bennett, Rhonda Holman, Norberto Perez, or "any other trustworthy DJJ employee" join me in a meeting with law enforcement to discuss the concerns directly. I was denied this by DJJ, even when I cited the danger it posed to me, and the way it could facilitate further abuses of Bullying and Harassment by Mrs. Callaham. I was left to deal with it alone, and today is a renewed example of how it continued to manifest itself as harm to me. I was "investigated" myself for these issues by the DJJ IG office in January. I was told by that Investigator that nothing more would be done, "Because I had already spoken to someone about it". In fact, the first thing he instructed me to do with my written answers to his questions that day was to write whether I had "already spoken to anyone about this". He presented me with the illogical circular intellectual trap of admitting to speaking to others about the topics he was there that day to speak to me about (because I spoke up about it), so that he could conclude that since I had previously spoken with someone about it he did not need to act. I would have preferred if DJJ relied on their own policy as a guide, rather than resort to gimmicks like this to deflect the concern. I additionally reported to Amahl Bennett after that January IG investigation in January, that I believed the Investigator had made an inappropriate comment to me at the start of his questioning. When I asked him my first question, he stated to me, "Look, this is the way we are going to do this. I am going to run this the same way my co-worker did when she had to deal with you. I will ask the questions." So, the standard was set by him bringing up (painfully for me) a conversation that happened years earlier when my co-workers conspired to falsely label me as a Pedophile. I, of course, asked to challenge that claim then, but was denied that opportunity by Mrs. Callaham, only after having me consent to her conditions for having that chance for a formal rebuke. I was never provided any outcome, leadership, or guidance on the topic since beginning with informal complaints to Amahl Bennett in Sept/Oct 2019, and through my formal complaints of 2020 to Human Resources.

I am asking for a vigorous investigation to determine who/why DJJ staff utilized the law enforcement community to aid in their bullying of me (making this situation dangerous for me) today and prior. I am asking for Mrs. Callaham to be terminated for continued violation of the DJJ policy regarding Bullying and Harassment, that included the statements that have culminated in the Officers statements (appropriately questioned/challenged by Johnnie Mae Herbert today). This issue was made clear to Human Resources in the context of my second formal complaint on the topic. In that instance the law enforcement community was accessed by Mrs. Callaham (based upon her slander) to prevent my access to the Edgefield Courthouse for work duties. I am asking for reinstatement to my post and position at the Saluda office. I am asking for other DJJ staff that have aided, participated in this or previous obstruction into legitimate inquiry and investigation on these topics to be held accountable within the guidelines of our Policy, despite their numbers or title. I am asking to no longer be Retaliated against for setting a boundary against Bullying in the workplace. I am asking to be made whole with support on this topic, and for the DJJ Policy to serve this purpose for me as an employee, now.

**FW: ISO Michael Carwane**

mcarwane@yahoo.../Inbox



**Michael R. Carwane** <michaelrcarwane@djj.sc.gov>

To: carwane michael <mcarwane@yahoo.com>. Michael Robert Carwane <mcarwane@troy.edu>

Aug 26, 2021 at 4:48 PM

**From:** Michael R. Carwane  
**Sent:** Thursday, August 26, 2021 4:48 PM  
**To:** Amahl W. Bennett <AmahlWBennett@djj.sc.gov>  
**Subject:** ISO Michael Carwane

Hello, You stated to me that you had not told my coworkers about your plan for me. However, by the time I had returned to the office Juwhana had moved into Mrs. Callaham's office to work as if she needed to demonstrate her discomfort with being near me. Again today the same. Pam Hudson just interrupted me while I was talking to Mrs. Herbert, after not speaking to me for a day, to tell Mrs. Herbert she had to cover the front office "since no one else is here". I said to Pam plainly, "Pam, I am right here." She said nothing to me like I did not exist, turned, and walked away. I deserve better than this. I have not harmed these people, they have harmed me. I have been kind. I have been professional... but the facts do not seem to matter, when they do not match the picture that is being painted of me. You said there were numerous workplace complaints in the office about me in the past two weeks. I deserve to know what those complaints are, to have a chance to refute them. Lies have previously been used by my Bully to sidestep her responsibility, and this feels the same. I have reviewed in detail my actions of the past two weeks in this office, and have done nothing outside of kind and professional. This is how Bullies damage careers. I have told you all along of the risk to me from the isolation, retaliation, sneaky, etc. I told you I was confused about how to do my best work with this being done to me. I asked for your protection, the protection of Human Resources, and my employer DJJ. I reached out to you during the two weeks that you have cited for these numerous complaints, with my own concerns about the behaviors I was witnessing during that same time frame. You were not available to me for support or leadership during those weeks, had not followed up with me for months previously, since I was explicit about practical questions I had, and left me unequipped with the comment "Just do You". When I heard that comment I believed it meant you had my back. Now I believe you allowed me to just be me (kind and professional) at a time others were not, yourself sorta hoping for the best. I got their worst. Both yourself and Mr. Perez had recently stated to me that the next step was to have opportunity to speak with the next level of my own chain of command, Rhonda Homan. Both of you conceded that discussion would require a significant allotment of time, and thus was not scheduled immediately. I agreed that could be helpful and was wanted by me. That added to my surprise, when that option turned out to be denied. Today, Zebulon Young, was unwilling to allocate more than thirty minutes to me to aid me with my decision. I like my job. I want to remain in the small town I chose to live in. I have invested in my contacts and connections with the juveniles/families I serve. I am too late in my career (and age) to be starting over elsewhere. My Depression (which is exacerbated by this forced move) does not allow me to have the extra energy required to learn a new town, new schools, new relationships, new service providers, new rules, etc. and perform at my best, at this time. The extra commute is a real hardship both for my emotional state and my old pickup truck (purchased on the salary of an entry level state employee) that failed to start this morning after only one drive to Greenwood to meet Mrs. Ponce. I allowed you to participate with me previously in a full listing of Pros and Cons for this type of lateral move. This office burden is not mine to bear. I do not want to fail. I do not choose to be victimized. Human Resources has badly missed the mark repeatedly, and in the arenas that they shift responsibility to Management, so have you. I am begging you for what is right. I am asking for the rights due an employee in this situation, as you have not even allowed me the ability to defend my name from the false accusations. The Bullying done by the law enforcement further reduced me of my Civil Rights. You gave the Bully a year to plan and orchestrate this, and I told you that I would not see all the traps set for me (though I tried). It does not matter if the wrong doing is done by one or many, they are to be held accountable by policy. Mr. Perez alerted me to the fact that Retaliation is typically done not by the perpetrator, but their allies. On this point Mr. Perez is a prophet; I wish he could have got some of the "investigating" right too. I am still asking for other options from you. Your co-worker, Mr. Michael Robert Carwane

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# **Exhibit 25**

**Re: Michael Carwane subpoena service request**

mcarwane@yahoo.../Sent



carwane michael <mcarwane@yahoo.com>  
To: Gene Matthews <gmatthews@richardsonplowden.com>

Mar 1 at 10:41 AM

I have attached copies of the original subpoena request and cert. of service, for your review and response Thank You, Michael Carwane

On Tuesday, February 28, 2023, 11:44:22 AM EST, Gene Matthews <gmatthews@richardsonplowden.com> wrote:

OK – can you send me your subpoena?

Gene

From: carwane michael <mcarwane@yahoo.com>  
Sent: Tuesday, February 28, 2023 11:40 AM  
To: Gene Matthews <GMatthews@RichardsonPlowden.com>  
Subject: Re: Michael Carwane subpoena service request

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders. I am asking for documents to be provided for Discovery for the grievance hearing.

I am not currently addressing the potential of a future lawsuit with this request. Thank You, Michael Carwane

On Tuesday, February 28, 2023, 11:25:20 AM EST, Gene Matthews <gmatthews@richardsonplowden.com> wrote:

Mr. Carwane:

What are you trying to serve for the grievance hearing?

Also, I understand that you have filed a lawsuit against SCDJJ that has not been served. Do you want me to accept service for that as well?

Sincerely,  
Gene Matthews

Eugene H. Matthews  
Attorney at Law  
[GMatthews@RichardsonPlowden.com](mailto:GMatthews@RichardsonPlowden.com)

Richardson, Plowden & Robinson, P.A.  
1900 Barnwell Street  
Columbia, SC 29201  
Tel: 803.578.3733 Fax: 803.779.0016  
[www.RichardsonPlowden.com](http://www.RichardsonPlowden.com)

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-----Original Message-----


From: carwane michael <mcarwane@yahoo.com>  
Sent: Tuesday, February 28, 2023 11:22 AM  
To: Gene Matthews <GMatthews@RichardsonPlowden.com>  
Subject: Michael Carwane subpoena service request


CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Mr. Matthews, I have made an attempt to provide service of a subpoena to Attorney Sara Bunge with the Department of Juvenile Justice. I was notified yesterday that after three attempts to deliver by certified mail, it was refused signature. I was asked by the State Human Resource department to communicate my efforts to you, in a good faith effort to gain acceptance of this Discovery request, as the hearing date draws near and you had presented yourself as representing SCDJJ as your client in this matter. Please provide a response, or an agreeable alternative, so that I may provide your office with that document. Thank You. Michael Carwane

2 Files 29.1kB

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 cert. of service SCDJJ.pdf  
9kB

 HR grievance subpoena SCDJJ.pdf  
20kB

**CERTIFICATE OF SERVICE**

I, the undersigned, Pro se Claimant, do hereby certify that I have served with the foregoing document by mailing a copy of the same by United States Mail, postage prepaid, to the following address:

Subpoena

Person/Party Served: **VIA CERTIFIED MAIL**  
SCDJJ  
c/o Attorney Sara Bunge  
220 Executive Center Drive  
Columbia, SC 29210



Michael Carwane

Saluda, SC 29138  
Feb 15, 2023

**THE STATE OF SOUTH CAROLINA**  
**BEFORE THE SOUTH CAROLINA**  
**STATE EMPLOYEE GRIEVANCE COMMITTEE**

In the Matter of:

Michael Carwane,

vs.

S.C. Department of Juvenile Justice

SUBPOENA

**TO: South Carolina Department of Juvenile Justice, 220 Executive Center Drive, Columbia, SC 29210**

By virtue of a Writ of Subpoena to you directed, you are required to produce the following:

1. Copies of all Human Resource and supervisory files (regarding employee Michael Carwane) to include supervisory and peer statements, reports for all informal and formal complaints investigated by Human Resources and/or Inspector General, and all contacts with the State Accident Fund.

**To: Michael Carwane, 302 The Heights Third Avenue, Saluda, South Carolina 29138, by March 3, 2023.**

Failure to observe the requirement of this subpoena may subject you to contempt proceedings.

13th day of February 2023  
Columbia, South Carolina

  
Chairperson  
State Employee Grievance Committee

# Exhibit 26

RE: Carwane v. DJJ Response Due 6/16/23

mcarwane@yahoo.../inbox



Gene Matthews <gmatthews@richardsonplowden.com>  
To: Keever, Heather <heather.keever@admin.sc.gov>  
Cc: carwane michael <mcarwane@yahoo.com>, MJ Wilson <mwilson@richardsonplowden.com>, Borchers, Amanda <amanda.borchers@admin.sc.gov>, Elizabeth A. Hill <elizabethahill@djj.sc.gov>, Shannon A. Davis <shannonadavis@djj.sc.gov>

June 19 at 11:35 AM

Heather -

Given the ALC's denial of Appellant's Motion to Compel, filed on June 19, 2023 and previously sent to you (and attached), it appears that Appellant's request has been rejected and is now moot.

Further, to the extent that Appellant's request seeks additional information related to the subpoena that was the subject of Appellant's earlier Motion to Compel, it also appears that Appellant's request has been rejected and is now moot.

Finally, given the Committee Attorney's earlier order, should the Committee issue the subpoena requested below, SCDJJ intends to move to quash it before the ALC, as required by SC Reg 19-718.07(D)(2).

Best regards,  
Gene

Eugene H. Matthews  
Attorney at Law  
[GMatthews@RichardsonPlowden.com](mailto:GMatthews@RichardsonPlowden.com)

Richardson, Plowden & Robinson, P.A.  
1900 Barnwell Street  
Columbia, SC 29201  
Tel: 803.576.3733 Fax: 803.779.0016  
[www.RichardsonPlowden.com](http://www.RichardsonPlowden.com)

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-----Original Message-----

From: Keever, Heather <[Heather.Keever@admin.sc.gov](mailto:Heather.Keever@admin.sc.gov)>  
Sent: Thursday, June 1, 2023 9:16 AM  
To: Gene Matthews <[GMatthews@RichardsonPlowden.com](mailto:GMatthews@RichardsonPlowden.com)>  
Cc: carwane michael <[mcarwane@yahoo.com](mailto:mcarwane@yahoo.com)>; MJ Wilson <[mwilson@richardsonplowden.com](mailto:mwilson@richardsonplowden.com)>  
Subject: Carwane v. DJJ Response Due 6/16/23

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Mr. Matthews,

Mr. Carwane has submitted the attached request to amend the subpoena that the Committee Attorney previously ruled could be issued beyond the timeframes for requesting a subpoena

Please provide a response to Mr. Carwane's request no later than June 16, 2023. If no response is received the Committee Attorney will make a decision based on the information provided. Specifically, please respond to the following request included in the attached: "I would like to ask SCDJJ in this amended Subpoena to provide me a listing of all contacts, with dates, by SCDJJ employees (or representatives) and the Saluda County Administrator (or representatives) regarding any aspect of video monitoring equipment in Saluda County to include installation, maintenance, access, or copies of video during the timeframe of August 2020 through present. Please include this language in the current amended Subpoena request for SCDJJ in addition to those amendments previously approved."

Sincerely,  
Heather Keever  
Program Manager, Alternative Dispute Resolution

The South Carolina  
Department of Administration  
220 Stoneridge Drive, Suite 402  
Columbia, South Carolina 29210  
803-896-5088 (office)  
803-917-1198 (cell)  
Lead Collaborate Innovate

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**CONFIDENTIALITY NOTICE:** This e-mail and any files transmitted with it contain information from the South Carolina Department of Administration which may be confidential or privileged. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee, you should not disseminate, distribute, or copy this e-mail. Please notify the sender immediately if you have received this e-mail by mistake and delete this e-mail from your system and destroy all electronic and hard copies of the communication, including attachments. Please note that any views or opinions presented in this e-mail are solely those of the author and do not necessarily represent those of the South Carolina Department of Administration.

1 File 80.9kB



Dismissal-Michael Carwane 23a0111.pdf  
81kB

STATE OF SOUTH CAROLINA  
ADMINISTRATIVE LAW COURT

Michael Carwane

Appellant/Petitioner,

vs.

SC Department of Juvenile Justice

Respondent.

Docket No. 23-ALJ-30-0111-IJ

PROOF OF SERVICE

I hereby certify that I have served the Appeal To Order of Dismissal  
(Description of the document) in the above-captioned matter by depositing it in the  
United State Mail, postage prepaid, on June 29, 2023 (Month/Day/Year) to the  
below named parties at their address of record:

Attorney Nick Halgler  
State Accident Fund

Name  
113 Reed Ave

Address  
Lexington, SC 29071

City/State/Zip

Attorney Ginny Bozeman  
Saluda County Administrator

Name  
400 W Highland St

Address  
Saluda, SC 29138

City/State/Zip

Attorney John Boyd  
Saluda Police Department

Name  
7015 Jefferson St

Address  
Saluda SC 29138

City/State/Zip

Attorney Gene Matthews  
South Carolina Department of Juvenile Justice

Name  
220 Executive Center Dr.

Address  
Columbia, SC 29210

City/State/Zip

Michael Carwane  
(Print Your Name)

Michael Carwane  
(Your Signature)

302 The Heights Third Ave  
(Street)

Saluda SC 29138  
(City, State, Zip Code)

**PROOF OF SERVICE: MOTION FOR  
SUPPLEMENTAL RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

**RECEIVED**  
JAN 10 2024  
SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

S. Phillip Lenski, Administrative Law Judge

Appellate Case No. 2023-001342

Michael Carwane ,

Appellant.

v.

South Carolina Department of  
Juvenile Justice

Respondent.

**PROOF OF SERVICE**

I certify that I have served the Motion For Supplemental Record on Appeal, on South Carolina Department of Juvenile Justice by depositing a copy of it in the United States Mail, postage prepaid, on January 8, 2024 addressed to the attorney on record, Gene Matthews, Richardson Plowden & Robinson, P.O. Drawer 7788, Columbia SC 29202.

January 8, 2024



Michael Carwane, pro se

302 The Heights Third Ave

Saluda, South Carolina 29138

(828) 301-7106

**PROOF OF SERVICE: MOTION FOR  
SUPPLEMENTAL RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

**RECEIVED**  
JAN 10 2024  
SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

S. Phillip Lenski, Administrative Law Judge

Appellate Case No. 2023-001342

Michael Carwane ,

Appellant.

v.

South Carolina Department of

Respondent.

Juvenile Justice

**PROOF OF SERVICE**

I certify that I have served the Motion For Supplemental Record On Appeal, on The Court of Appeals by depositing a copy of it in the United States Mail, postage prepaid, on January 8, 2024 addressed to SC Court of Appeals, Clerk of Court, Jenny Abbott Kitchings, P.O. Box 11629, Columbia, SC, 29211

January 8, 2024



Michael Carwane, pro se

302 The Heights Third Ave

Saluda, South Carolina 29138

(828) 301-7106