

S.C. COURT OF APPEAL

P.O Box 11629
Columbia S.C. 29211

Re: Jeffrey D. Jones v. Richard A Shirley
Appellate Case No: 2013-001816

Dear Clerk

I am not understanding what you are asking for When you say proposed complaint So I enclosed a copy of my complaint on Richard A Shirley, Anderson County Clerk of Court. If this is not what you are asking for Please let me know Im a Layman of the Law

9/04/13 sc
dated

SI Jeffrey Jones
Jeffrey D. Jones 290522
MCCX SMU B 85
386 Redemption Way
McCormick S.C. 29899

DIAM 2013-09-04

RECEIVED

SEP 11 2013

SC Court of Appeals

LEGAL MAIL

LEGAL MAIL

LEGAL MAIL

LEGAL MAIL

LEGAL MAIL

LEGAL MAIL

LEGAL MAIL

STATE OF SOUTH CAROLINA
COUNTY OF Anderson

Jeffrey D. Jones
Plaintiff

✓

Richard A Shirley, Anderson Co
Clerk of Court, Anderson Co, et al
all in,

Defendants

COURT OF COMMON PLEAS
C/A 13-CP-04-01691

COMPLAINT

(Jury Trial Demanded) JAD3.

RECEIVED

SEP 11 2013

SC Court of Appeals

I pro se Plaintiff, complaining of the above Defendants states
as follows.

JURISDICTION

1. Defendant Richard A Shirley is being sued individually & in his official capacity as Anderson County Clerk of Court; which are governmental entities duly organized & existing under the laws of South Carolina
2. At all the times relevant to the incident &/or Complaint I was/am/is a citizen of South Carolina &/or incarcerated within the SCDC
3. Therefore, venue is proper in Anderson County & this court is vested with jurisdiction over the parties & the subject Matter.

FIRST CAUSE OF ACTION

4. Plaintiff asserts that he has a right to obtain documents pertaining to the grand jury which indicted him pursuant to A.) Due Process Clause of the U.S. Const. Amend XIV & the S.C. Const Art. I § 3. B.) the sixth Amend of the U.S. Const, C.) The State Constitutional Mandate that all courts shall be public of the S.C. Const. Art. I, § 9, & D.) Public policy as expressed in the State Freedom of Information Act of S.C. Code Ann § 30-4-15 to 165 (1991 & Supp 2003) & The Federal Freedom of Information 5 U.S.C § 522
5. Plaintiff has a right to obtain documents pertaining to the grand jury which indicted him to determine whether the grand jury which indicted him was properly established constituted under law & whether they in fact consider the criminal allegations against him.
6. I wrote defendants on or about 3-12-13 for my grand jury's A.) Impanelment Documents, B.) Petition, C.) Supporting Materials & D.) Impaneling judge order
7. Defendant wrote back denying my request alleging that..... the proceeding of the Grand Jury are confidential & only discussed behind closed doors. There are no official records

LEGAL MAIL

LEGAL MAIL

LEGAL MAIL

LEGAL MAIL

LEGAL MAIL

LEGAL MAIL

- or transcripts of the discussion which led to your indictment.
8. Writs of Venire facias were to be delivered to the Sheriff's department requiring the attendance of Grand jurors, which the clerk of court or Chief Administrative Judge for the 10th Circuit has determined to be sufficient in order to impanel a grand jury in my case.
 9. Anderson County Sheriff's Department did make an attempt to serve all writs of Venire Facias.
 10. Anderson County Sheriff's Department did report to presiding judge the names of those persons who were served & not served with These documents were filed with the Clerk of court.
 11. Defendant allege that "..... the proceedings of the Grand Jury are confidential".....
 12. The grand jury documents remain (Confidential) secret only to the extent necessary to prevent disclosure of Matters under consideration by the County grand jury. Removing the veil of secrecy after a defendant has been indicted is consistent with the legislative intent.

Due Process Violation

13. I have been deprived of life, liberty & property without due process of law by the defendants denying him the right to obtain documents pertaining to grand jury which indicted him so he could determine whether the grand jury which indicted him was properly established, constituted under law & whether a grand jury or just one person consider the Criminal Allegations against him
14. WHEREFORE, Defendants are liable to me in a sum to be determine by the court. noting that my life has no price on it punitive damages of \$ 300,000.00 & For any other relief this court deems just & proper
15. I affirm the above is true & Correct

9/03/13 s.c.
dated

JAM JAOE

Respectfully

sl Jeffrey Jones

Jeffrey D. Jones 290522

MCCI SMU B 25

386 Redemption Way

McCormick SC. 29899

LEGAL MAIL

LEGAL MAIL

LEGAL MAIL

LEGAL MAIL

LEGAL MAIL

LEGAL MAIL

A TRUE COPY

JUL 29 2013

Plaintiff)
CLERK OF COURT)



STATE OF SOUTH CAROLINA)
 COUNTY OF ANDERSON) IN THE COURT OF COMMON PLEAS
 JEFFREY D. JONES #290522) 10TH JUDICIAL CIRCUIT

**MOTION AND AFFIDAVIT TO
 PROCEED IN FORMA PAUPERIS**

vs.

RICHARD A. SHIRLEY, CLERK OF)
 COURT, ANDERSON COUNTY, ET)
 AL)

Defendant.) FILE NO. 2013-CP-04-01691

CLERK'S OFFICE
 ANDERSON SC
 013 JUL 29 A 9:27
 GENERAL SESSIONS

I, JEFFREY D. JONES #290522, being duly sworn, state that I am the Plaintiff and that I do not have the funds available to pay the costs of filing and service in the present matter. I hereby request that the complaint be filed and service made without costs.

Sworn to and Subscribed before me)
 this day of , 2)
)
)
 Notary Public for South Carolina)
)
 My Commission expires)

 Signature of Plaintiff or
 Person Filing Complaint on Behalf of
 Plaintiff


ORDER

- Leave is *granted* to proceed in forma pauperis without payment of the filing fee.
- Leave is granted to proceed in forma pauperis without payment of the service cost.
- Leave is *denied* to proceed in forma pauperis.

EXHIBIT
#3

RECEIVED
SEP 11 2013

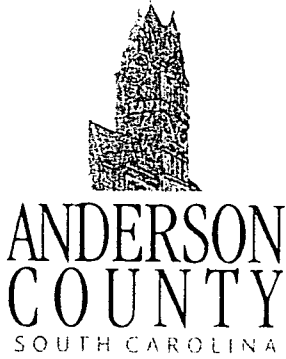
Dated: 26th JULY , 2013
 ANDERSON , South Carolina



 JUDGE/CLERK OF COURT

COURT OF APPEALS

NOTICE TO PLAINTIFF: The Court may assess costs against either party at hearing.



Anderson County Clerk of Court

P.O. Box 8002
Anderson, SC 29622
(864) 260-4053
Fax: (864) 260-4715

August 9, 2013

Mr. Jeffrey D. Jones 290522
MCCI SMU B25
386 Redemption Way
McCormick, South Carolina 29899

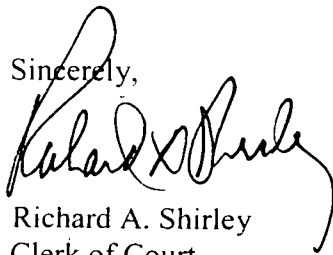
Re: Rule 59(e) Motion

Dear Mr. Jones:

Please find enclosed a Form 4 from Judge Alexander S. Macaulay's ruling on your Rule 59(e) Motion. Judge Macaulay, Chief Administrative Judge for the Tenth Judicial Circuit, denied your motion.

A stamped copy of this form is provided for your files.

Sincerely,



Richard A. Shirley
Clerk of Court

RAS/rs

enclosure

EXHIBIT
#4