

17 Mar 2025

RECEIVED
MAR 24 2025
SC Court of Appeals

Alan Nix
c/o Michael & Taryn Lazroff
1401 Densmore Circle
Mount Pleasant, SC 29466

(living in / trespassing at my family's lawfully owned home based on void deeds dated 23 Oct 2020 and 12 May 2021 and fraudulent BAIL PROCEEDING FORM II dated 26 Jan 2021)

RE: Office of Disciplinary Counsel complaints 24-DE-L-1591, etc. / Benjamin Mack

Dear Mr. Blitch.

Assuming you and/or your Office has not recused itself from these cases as yet, please accept this letter as additional information related to complaint 24-DE-L-1591, etc. As soon as I get my entire case file from Ms. Blazer, the County of Charleston, Benjamin Mack, etc., as I requested three months ago, I will provide additional information.

1. On the evening of 6 Nov 2024, while I was still incarcerated at the County of Charleston Detention Center on their 16 Sep 2024 bench warrant, I received a letter from your office related to "File Number: 24-DE-L-1591" dated 31 Oct 2024. Based on my receiving this letter under less than ideal / normal delivery circumstances on 6 Nov 2024, I am assuming that Benjamin Mack and his associates and supervisors knew about it no later than 4 Nov 2024 if you also notified them of this complaint via USPS. In the event you notified Mack, etc. of this complaint by email or some similar electronic delivery system, it seems likely that Mack, etc. knew about the complaint on or before 1 Nov 2024.

If my assumptions above about when Mack and his supervisors knew about my complaints are correct, then I would allege that:

- a. Mack was required to notify all involved parties about his / their clear conflicts of interest related to allegedly representing me no later than 5 Nov 2024, and most likely no later than Friday, 1 Nov 2024.
- b. Mack was required to enter a motion to be relieved citing this and many other conflicts of interest no later than 5 Nov 2024, and most likely quite a bit earlier..
- c. I am unaware of any evidence that Mack nor his supervisor(s) took any such required action at any point before 8 Nov 2024 (or for that matter, even as of today) which is long after his multiple acts of misfeasance and/or malfeasance between 4 Nov 2024 and 7 Nov 2024 and the resulting damages had occurred.

2. On 4 Nov 2024, approximately around lunch time, Mack told me that motions to dismiss were not allowed in criminal cases. On information and belief, this statement by Mack was not true. Additionally, assuming Mack actually believed his almost certainly false statement for some reason, which I allege he did not, Mack had several months to research such and utilize what I am fairly sure was ready access to resources that would have been able to quickly correct him. (See my motion to dismiss in case 2021A1010200475 from last year for reference)
3. On 4 Nov 2024, approximately around lunch time, I told Mack about a Federal 1983 lawsuit I had filed against Christopher Craven on 9 Sep 2024. Mack seemed to not know about this lawsuit despite the fact that Scarlet Wilson almost certainly did know about this action. This lawsuit alleged that Craven had knowingly falsely testified under oath on both 21 and 22 Jan 2021 to have felony arrest warrant 2021A1010200444 issued against me. (The victim Craven cited in both of these arrest warrant affidavits was identified as a Joe Dawson, who Craven stated was "an attorney that represents the County of Charleston" and was also a witness to his alleged victimization at 4045 Bridge View Dr., North Charleston, SC on 21 Jan 2021). Despite Mack knowing that his County of Charleston co-employee Craven had a Federal lawsuit filed against him by me related to these cases, Mack never even mentioned this substantial issue at any point between lunch on 4 Nov 2024 and the evening of 7 Nov 2024. It seems obvious that such a significant situation would be used to question/ undermine a witness in Mr. Craven's situation if someone like Mr. Craven was testifying against an alleged client. However, once again, Mack and Mangan chose not to put their co-employee and employer in such a predicament.
4. On the morning of 4 Nov 2024, Mack stated that he would deal with the fact that Ms. Wilson and her associates had not named any victims in their indictments during his closing argument. A short while later when I was allegedly "arraigned" on charge 2023-GS-10-05003, I stated that I did not know who the alleged victim was because it was clearly missing from the indictment. At that point, Mr. Taylor falsely stated as fact that the indictment was clearly sufficient on its face.

A few hours later on 4 Nov 2024, McAllister, Brewer, Taylor, Mack and Mangan decided they actually had to name an alleged victim their 2023-GS-10-05003 indictment. When McAllister seemed to be confused about who his, Brewer's and Wilson's alleged victim should be, Mack jumped in to help them by saying "the defense" was not sure if their alleged victim was Christopher Craven or the entire County of Charleston Sheriff Dept. This help, which was clearly improper to provide given the circumstances, is quite disturbing for multiple reasons, not the least of which is that neither Christopher Craven nor the entire County of Charleston Sheriff Dept is named in the attached bond order dated 26 Jan 2021, which had never been changed even as of 4 Nov 2024. (copy of bond order included for reference) I allege this "help" by Mack was knowingly improper and meant to harm me and my family while helping his employer and co-employees.

Additionally, it seems obvious that once someone like me has raised such an obvious problem with one case, that if the same problem existed in another companion case such an issue should be promptly raised and dealt with. However, Mack did nothing at all to address the fact that this very same issue existed with indictments 2021GS1002600, 2021GS1002599 and 2023GS1005002. I allege that this "failure", given these circumstances, was intentional. Additionally, Mangan acknowledged knowing about these issues multiple times, including Mack's apparent plan to raise this issue during closing, and took no action. Mack **never** raised the issue of indictment 2023GS1005002 not naming a victim, including during his very poor excuse for a closing statement. Raising such an issue during closing, based on what I believe to be the case, is, at best, malpractice. Given the circumstances, I believe this conduct was premeditated and not remotely an accident.

5. As related to the same "arrest" noted above, I never had a bond hearing for indictment 2023GS1005003. I am fairly sure that I was arrested on indictment 2023GS1005003 on the morning of 23 Oct 2024. On the evening of 28 Oct 2024, Mack described my arrest as being "handed a copy of the indictment". I allege that Mack, Blazer, Wilson, McAllister, etc. agreed to create a situation where I was never given a bond hearing for my 23 Oct 2024 arrest on indictment 2023GS1005003. It is my understanding that by South Carolina law, with very few exceptions, that a bond hearing is required to be held within 24 hours of being arrested. Clearly these parties (Mack, Blazer, Wilson, McAllister, etc.) did not want me to ever have my constitutionally required bond hearing for case 2023GS1005003 and Mack clearly took no action to ensure I had a bond hearing. My allegations of why Mack engaged in this misconduct will be addressed in a future filing.
6. I allege that it is a clear conflict of interest for an attorney to represent a party in a case when that very same attorney, their previous manager, several of their co-employees and their employer are being sued by that very same represented party in a different, but highly related case, at the same time. See case 2024CP3900073.
7. Mack, Pennington, Woosley, Mangan and Blazer failed for over three and a half years to provide me a copy of all of the evidence they had in their possession. This issue is especially egregious given that they had me in their jail for a total of almost five months during this period of time and never even gave it to me while I was in their custody. I allege this was not an accident but a premeditated denial of evidence which I could have, and would have, used to make informed decisions and against multiple parties, including but not limited to, the County of Charleston and numerous of its employees.
8. Mack and Blazer took no action whatsoever between 16 Sep 2024 and 5 Nov 2024 to have their 16 Sep 2024 bench warrant rescinded. I allege this was intentional, coordinated, and meant for improper purposes. I am still awaiting the transcript from 16 Sep 2024.

9. I allege that Mack intentionally filed a fraudulent / frivolous motion to amend bond in case 2023GS1005003 sometime in late 2023 with the express purpose of making himself attorney of record in this case without me agreeing to him being my attorney or authorizing him to enter a notice of appearance. Practically speaking, and based on the fact that I wasn't arrested on case 2023GS1005003 until 23 Oct 2024 and have never had a bond hearing on this case, how would Mack, or any other rational human for that matter, somehow think they could amend / change something that does not exist and has never existed. At least to a layman like myself, it seems relatively impossible to modify something that has never, and still doesn't, exist. I allege that Mack, along with other parties knowledge and consent (McAllister, Wilson, Blazer,, etc.) , knowingly filed this motion with the clear intent to commit fraud upon the court by deceiving an unsuspecting judge .
10. On the morning of 4 Nov 2024, at the very last possible moment, Mack showed me a copy of his motion to be relieved which he had filed at least five or six days earlier. First, Mack did not provide me a copy of his motion despite the fact that such copies are manually sent to their jail in North Charleston by County of Charleston employees. Additionally, Mack made untrue statements in his motion to be relieved and did not correct them, either in writing as I stated he had to do, or verbally as he stated he would do. The number and of false statements in this motion is not currently known as I only had a few brief moments to read the very first part of it. If I had had a copy of this motion in a timely manner, I would have responded in writing to the false statements. I allege that Mack intentionally did not provide a copy of this motion to me so as to both surprise me as well as to prevent me from raising these issues in writing in a timely manner. This complaint will be further documented once I have a copy of this motion for review.
11. Despite knowing that I was locked away in their jail, Mack did not notify me of Ms. Abbott-Kitchings order granting me seven whole days to respond with a motion to have Mack removed from one or more of these cases. Mack knew where I was because he and Mangan visited me on the afternoon of 24 Sep 2024 at their jail. If I had been timely notified of Ms. Abbott Kitchings order, I would have done my best to respond with a motion to have Mack removed within those seven days. I allege that Mack intentionally did not notify me of this order nor notify the Court of Appeals of my whereabouts to prevent me from filing a motion to remove him from my cases.

I will provide additional information / complaints as soon as I have the documentation I requested three months ago and have a little time to go through it.

Yours truly,



Alan Nix

PS: Ms. Harrison and Ms. Kitchings. Please ensure you have filed a copy of your affidavits related to your communications with Mack between about 18 Sep 2024 and 24 Sep 2024 and be aware that I will be taking whatever additional legal action is necessary in the next week or so to finally get a complete copy of my files from the County of Charleston, Blazer, Mack, etc.. I trust there is no misunderstanding about my issues with Mack, the County of Charleston, and their associates and my intent to ensure they are not only not involved in any appeal on my behalf but hopefully disbarred sooner rather than later.

cc.

Hugh Ryan, Director
SC Commission on Indigent Defense
1330 Lady St., Ste. 401
Columbia, SC 29201

Alan Wilson
SC Attorney General
1000 Assembly St.
Columbia, SC 29201

Ms. Harrison and Ms. Abbott Kitchings
SC Court of Appeals
1220 Senate St.
Columbia, SC 29201

Cameron Blazer
County of Charleston
101 Meeting St.
Charleston, SC 29401

Bill Tuten
County of Charleston Administrator
4045 Bridge View Dr.
North Charleston, SC 29405

**BAIL PROCEEDING
FORM II**

STATE OF SOUTH CAROLINA

COURT OF GENERAL SESSIONS

COUNTY OF CHARLESTON

STATE OF SOUTH CAROLINA

ORDER SPECIFYING METHODS AND CONDITIONS OF RELEASE

v.

ALAN GREGORY NIX
NAME OF DEFENDANT

Offense Charged: TRESPASS AFTER NOTICE / RESISTING ARREST / INTIMIDATION OF COURT OFFICIAL JURORS OR WITNESS

At a bail proceeding conducted by the undersigned judge, for the defendant named above, it was determined by the court (check one or both):

- The release of the defendant on recognizance will not reasonably assure his appearance as required.
- The release of the defendant on recognizance will result in an unreasonable danger to the community.

This determination was based upon the following findings of fact: ←

[Considerations: Nature and circumstances of the offense charged, the defendant's family ties, employment, financial resources, character and mental condition, the length of his residence in the community, his record of convictions, and any record of flight to avoid prosecution or failure to appear at other court proceedings.]

THEREFORE, IT IS HEREBY ORDERED:

1. That the above named defendant be released from custody on the condition that he will personally appear before the designated court at the place, date and time required to answer the charge made against him and do what shall be ordered by the court and not depart the State without the permission of the court and be of good behavior.
2. That the above named defendant be released from custody provided as follows (check all that apply):

CASH IN LIEU OF BOND

The defendant, acknowledges himself to be indebted to the State of South Carolina in the sum of _____ to secure his release from custody. Should the defendant fail to comply with all terms and conditions of this Order, this sum of money is subject to being forfeited to the State.

CASH PERCENTAGE IN LIEU OF BOND

The defendant, acknowledging himself to be indebted to the State of South Carolina in the full amount of _____, his release to be obtained by payment to the court of _____ % (not to exceed 10%) of the full amount of the bond, deposits _____ to secure his release from custody. Should the defendant fail to perform the conditions of this Order, the full amount shall be levied on his real and personal property for the use of the State.

APPEARANCE RECOGNIZANCE WITH SURETY

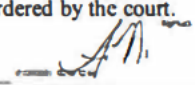
The defendant will provide good and sufficient surety approved by the court, in the form hereinafter set forth in this Order, acknowledging an indebtedness to the State in the amount of **\$65,440.00**.

3. That the defendant shall appear at (check one):

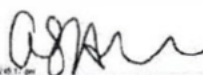
the term of COURT OF GENERAL SESSIONS beginning on Upon Call of Court at **2:00 o'clock, P.M.** at **CHARLESTON COUNTY JUDICIAL CENTER, 100 BROAD STREET, CHARLESTON** and remain there throughout that term of court. If no disposition is made during that term, the defendant shall appear and remain throughout each succeeding term of court until final disposition is made of his case, unless otherwise ordered by the court.

the session of Summey: 6185 Rivers Ave., Ste E, N. Chas, beginning on Friday, March 19, 2021 at 10 o'clock, A.M. If no final disposition is made during that session, the defendant shall appear at such other times and places as ordered by the court.

INITIALS OF DEFENDANT



4. That the defendant will notify the court promptly if he changes his address from the one contained in this order and he will comply with those conditions described hereinafter in the Order.


SIGNATURE OF JUDGE: Haselden

January 26, 2021
DATE

ACKNOWLEDGEMENT BY DEFENDANT

I understand that if I violate any condition of this Order, a warrant for my arrest will be issued.

I understand and have been informed that I have a right and obligation to be present at trial and should I fail to attend the court, the trial will proceed in my absence.

It has been explained to me that if I fail to appear before the court as required, a warrant for my arrest will be issued.

ADDRESS _____		SIGNATURE OF DEFENDANT: <u>Alan Gregory Nix</u> ALAN GREGORY NIX
CITY/STATE/ZIP _____	TELEPHONE _____	January 26, 2021 DATE
SOCIAL SECURITY NUMBER _____	DRIVER'S LICENSE OR ID NUMBER _____	ATTORNEY REPRESENTING ACCUSED (IF KNOWN) _____

SPECIAL CONDITIONS OF RELEASE

a. Placement in custody. The defendant is placed in the custody of: _____
NAME OF PERSON OR ORGANIZATION

ADDRESS _____ CITY/STATE _____ ZIP _____ TELEPHONE _____
who agrees (1) to supervise the defendant as set forth by the court, (2) to use every effort to assure the appearance of the defendant at all scheduled hearings before the court, and (3) to notify the court immediately in the event the defendant violates any conditions of his release or disappears.

SIGNATURE OF CUSTODIAN (IF APPROVED) DATE

b. Restrictions on Travel, Association or Residence. The defendant will comply with each of the following conditions:

c. Part-time Release. The defendant will be released from custody from _____ o'clock, _____ to _____ o'clock, _____
on _____ on condition that he return to the custody of _____
at _____ as designated.
DATE(S) NAME OF PERSON OR ORGANIZATION LOCATION

d. Other Conditions. The defendant will comply with the following other conditions of release: You will be advised by mail of your next court appearance. It is your responsibility to maintain your current mailing address with the Clerk of Court for General Sessions. **NO CONTACT WITH VICTIMS NOR ANY FAMILY MEMBERS OF THE VICTIM VERBALLY, ELECTRONICALLY, BY PHONE, ON SOCIAL MEDIA OR BY THIRD PARTY, OR IN WRITING. YOU ARE BARRED FROM WITHIN ONE BLOCK OF THE VICTIM'S RESIDENCE, SCHOOL, BUSINESSES AND/OR WORK.**

THE VICTIM'S ARE AS FOLLOWS: ENTIRE MASTER AND EQUITY OFFICE (CURRENT AND PREVIOUS EMPLOYEES) :

LAURA BECK, KATIE BURUNSON, JAN ONEALE HEARN, CINDY YARBOUROUGH, CHRISTINE SMITH, MIKELL SCARBOROUGH, MARTI DENNIS, RYAN CONNOR, SPENCER GILL, JUDY DAWKINS, HUNTER JAMES, BARNWELL RASWELL

CHARLESTON COUNTY MAGISTRATE TOM LYNN

DEF IS NOT TO POSSESS OR AQUIRE ANY FIREARMS , KNIVES OR WEAPONS OF ANY KIND DURING THE PENDENCY OF THIS CASE. ANY WEAPONS MUST BE TURNED OVER TO ATTORNEY LE, OR FAMILY MEMBERS THAT WILL GO ON RECORD

DEF IS NOT TO RETURN TO THE INCIDENT LOCATION

DEF IS TO WEAR A GPS MONITOR AND IS NOT TO GO WITHIN A 5 MILE RADIUS OF 1401 DENSMORE CIRCLE. GPS MONITOR DOES NOT PROHIBIT DEF FROM LIVING ANYWHERE IN THE STATE NO CONTACT WITH VICTIMS NOR ANY FAMILY MEMBERS OF THE VICTIM VERBALLY, ELECTRONICALLY, BY PHONE, ON SOCIAL MEDIA OR BY THIRD PARTY, OR IN WRITING. YOU ARE BARRED FROM WITHIN ONE BLOCK OF THE VICTIM'S RESIDENCE, SCHOOL, BUSINESSES AND/OR WORK.

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DEF IS NOT TO RETURN TO THE INCIDENT LOCATION

DEF IS TO WEAR A GPS MONITOR AND IS NOT TO GO WITHIN A 5 MILE RADIUS OF 1401 DENSMORE CIRCLE.

GPS MONITOR DOES NOT PROHIBIT DEF FROM LIVING ANYWHERE IN THE STATE

APPEARANCE RECOGNIZANCE WITH SURETY

On the _____ day of _____, _____, personally appeared before the undersigned judge the surety named below who acknowledged himself indebted to the State of South Carolina, in the sum of _____, such sum to be levied on his real and personal property for the use of the State, should named defendant fail in performing the conditions of this Order.

The surety, being duly sworn, says that he is a resident and free holder within the State and is worth the sum acknowledged and underwritten herein, over all his debts and liabilities, and exclusive of property exempt from execution.

_____ NAME OF SURETY BONDSMAN COMPANY	_____ TELEPHONE	_____ SIGNATURE OF SURETY BONDSMAN
_____ ADDRESS OF SURETY BONDSMAN		
_____ CITY/STATE/ZIP		_____ SIGNATURE OF JUDGE.
_____ NAME OF INSURANCE COMPANY		_____ DATE
_____ ADDRESS OF INSURANCE COMPANY		
_____ CITY/STATE/ZIP		

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

AFFIDAVIT

OCA # 2021-000600

Personally appeared before me, a magistrate of this County, one Sgt. C. Craven, who, first being duly sworn, deposes and says that

Alan Gregory Nix

did within this County and State on or about the 21st day of January 2021 violate the criminal laws of the State of South Carolina in the following particulars:

DESCRIPTION OF OFFENSE
intimidation of Court Officials
16-9-340

The affiant states that there is probable cause to believe that the defendant named above did commit the crime(s) set forth, and that such probable cause is based on the following facts:

That on January 21, 2021, while at 4045 Bridge view Drive , North Charleston S.C., in the County of Charleston and State aforesaid, the above named defendant, **Alan Gregory Nix**, did commit the offense of violation section 16-9-340 of the South Carolina State Code of Laws, 1976 as amended, **Intimidation of Court Officials**, in that he did willfully and unlawfully, provided written communications to intimidate the deputies of the Charleston County Sheriff's Office into not enforcing a Writ of Assistance signed by Master in Equity Mikell R. Scarborough on December 30, 2020 (2017CP1004031) ordering the property to be vacated by 12:00 P.M. on January 22, 2021."

That on January 21, 2021, the defendant arrived at the Charleston County Legal office and provided copies of court documents, and on the cover page a handwritten note stating "Joe, Here is the Headline: shootout & standoff between Charleston County Sheriff 's Office & Homeowner Intentionally & Premeditatedly set up by corrupt Judge, Mikell Scarborough"

The above information was revealed through the investigation of Sgt. C. Craven and the victim identified as Joe Dawson who is an attorney that represents the County of Charleston are witnesses to prove the same against the form of the statute in such case made and provided against the peace and dignity of the State.

Sworn to and Subscribed before me

This 21 day of Jan, 2021 _____

Signature of Judge



Affiant

3691 Leeds Ave
North Charleston, SC 29405
843-202-1700



Nix
1401 Densmore Circle
Mount Pleasant, SC 29466

GREENVILLE SC 29602

20 MAR 2025 PM



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MAR 24 2025

SC COURT OF APPEALS
ATTN: CLERK OF COURT
1220 SENATE ST.
COLUMBIA, SC 29201

SC Court of Appeals

29201-376999

