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STATE OF SOUTH CAROLINA  
IN THE ADMINISTRATIVE LAW

DEC 02 2025

SC Court of Appeals

#178039

COURT

Docket No. 25 50579

Mr. Robert Graham, Jr.  
(APPELLANT)

Case No: PCI-0686-  
25

VS -

initial brief

SCDC

RESPONDENT

Hon. <sup>pgs 1 of 9</sup> Reibold

STATEMENT OF ISSUES

(1) whether the respondents intentionally, knowingly, willingly & deliberately within meaning of 16-5-10 conspiracy statute depriving appellant of 1st and 14th Amendment rights i.e. civil human rights by violations of statutory meaning, wording, language of 16-16-20(b)(1) - altering, scheming, removing data, names and their personal identification code numbers was violated in the process

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AUG 15 2025

(2) TRU lock 275, 3d 405 PCI MAILROOM was appellant subject to violations ~~of confidentiality~~ retaliation by (ZGC), mcknight, ~~Refusing to~~ send criminal allegations in Greenville to chief branch for inspection general review ~~hindering~~ frustrating significant hardship, interfering, threatened to change him for reporting ~~where she~~ ~~has been~~ ~~in front of~~ numerous staff in ~~Section 4,~~ ~~Section 3~~ 25-04027112 ~~in~~ ~~August~~ ~~2025~~ ~~and~~ ~~v-~~ ~~unfair~~ ~~breach~~ ~~to~~ ~~gain~~ ~~unfair~~ ~~adv-~~ ~~of~~ ~~same~~

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AUG 15 2025  
Administrative Law Court

(3) whether [redacted] individual Author; 25-04021404  
under "staff" heading as C. Early, written,  
admitting (I & C) McKnight threatened to [change]  
appellant and violation [confinement] section 4.1  
section 3 admitting her guilt, when he under  
"staff" identification came on computer keyboard -  
assuring appellant it had been resolved

(4) whether (I & C) McKnight was in [direct violation]  
of section 15. GRIEVANCES ALLEGING CRIMINAL  
ACTIVITY: Any grievance which alleges criminal activity  
shall be referred "immediately" to the Agency INMATE  
GRIEVANCE Branch coordinator/designee,  
when ACTION TAKEN BY (I & C); processed in box  
at bottom of the STEP 1 grievance, she tried to  
get him to first file RTSM to Amy Hall at  
H@) [redacted] substantial hardship had he obeyed.

(5) WHETHER, STAFF is persons for purposes of WISCA  
1982 under color of state employee's

(6) WHETHER, the filing of a grievance is the first  
stage process for initiation of confinement  
scale 383 Fapp #4; and if so, does it  
create a significant hardship of duress,  
interference with doing so when Respondents  
had names identification replacing them  
with "STAFF" from challenging conditions  
of confinement in various of exhaustion  
access to court. (a)

## STATEMENTS OF CASE

may it please the court:  
on or about May 5, 2025, appellant filed "Emergency  
Concerns" and engaged in conversation of (ZGC)  
on the computer kiosk" it was of first noti-  
on. He observed for the very first time,  
that the names and identification badge num-  
bers had been "altered" removed, replaced  
with "TITLES" "STAFF" I submitted RFSM  
on or about the same time for resolve, with no  
end insight; Response" Appellant filed Govern-  
ance July 18, 2025 outlining in its body his  
allegations; and grounds constitutionally criminal  
conspiracies by Respondents in violation 16-16-  
20 (b) (1) 16-5-10 civil human rights wa-  
rrents requesting the names and identification  
badge numbers be placed back - And; he  
would pursue <sup>no</sup> further criminal prosecution, or  
process the ~~step~~ <sup>step</sup> ~~Governance~~ <sup>Governance</sup> further...  
trying to come to immediate resolve at the  
institutional level" This ended appellant into  
being threatened, harassed, retaliated against  
by (ZGC) for being charged by reporting her  
refusal to process the allegation as noted  
7/31/2025 kiosk "computer" 25-04 @ 27112  
Author: titled "Staff" posing to be C.  
Early, Warden. That my complaint against her  
refusal had been resolved. Though the staff  
never disclosed what action was taken  
(3)

ARGUMENT ONE

16-16-20 (b) (1) Verbatim

If the state statutory laws contains language  
prohibiting respondents from taking actions  
of discretion contrary to appointed protected  
secured privileges, rights, immunities, customs, ~~usage~~  
freedoms being deprived 1st Amendment right of  
free speech redress access to courts under  
the two (2) components of 4th Amendment due  
process equal protection from state & federal.  
C. Early, Susan Duffly A/W clutter Holbrook  
classification from removing names; and their  
government identification codes from state computer  
clock system as mandated in 16-16-20 (b) (1)  
including (ABC), McKnight: then it stands to  
reason doing such has intentionally, knowingly,  
willful, deliberate conspiracy to cause harm,  
duress, frustration, abandonment, (deprivation) of  
secured right, protected right to act outside  
statutory boundaries "safeguards" of protection  
to protect them from hindering, interfering with  
appointments exhaustion (PLEA) which is established  
to be before this court criminal in nature.

See, 86 s.c.f. U.S. v. United States v. Cecil

RAY PRICE, misdeemeanor, under color law  
statute, ordinance, regulation or custom, of will-  
fully subjecting any inhabitant of any state  
to the privation of any rights state as properly  
stated by ~~alleged~~ those of willful deprivation, under  
color of law, of life and liberty without due process  
of law 18 U.S.C.A. § 242 as ~~presented~~ pres-  
ented in this initial brief Verbatim 16-16-20 (b)  
(4)

Argument # 2

Trivlock V. 275 F.3d 405

state policies, Verbatim strictly forbids retaliation / reprisal Section 4.1 Section 3

The record before this honorable court not only promotes allegations "supplant" for exercising of this courts power to hear these claims but moreover to take exceptions to the person posing of "staff" Author; 25-04-027 you c. Early, warden. Reading admitted (GC) retaliated, harassed, threatened to charge applicant for reporting her refusal to a bidding by policy Section 15 + but, that:

He'd resolved the same. placing significant fear of applicant going to lockup, transference, for which he's witnessed Respondents do consistently, with other prisoners reporting misconduct of "staff" especially, with him raising criminal charges, it is most clear before this court (GC) become so enflamedly hostile "only to protect her co-workers from criminal prosecution" it is insulting to the intelligence of this court for respondents to dare perjury themselves violate ethical professional rules of conduct by suggesting the computer kiosk could change names, or identify person codes or the mysterious "title" staff, as Author - could have never - ever been used for which (GC) threats was to hide the fact that she herself name is altered removed violation (16-2)(b)(c)

## ARGUMENT # 3

Inmate grievance (IGC) was in direct violation of some well known - established policy section 15 where it reads GRIEVANCES "ALLEGING CRIMINAL ACTIVITY." ANY grievance which alleges criminal activity (will) which is mandatory language be referred immediately to Agency Inmate Grievance Coordinator / designee, Inmate Grievance Branch. The (IGC) (will) mandatory language note on the grievance tracking CRT screen that the grievance has been forwarded. The inmate grievance branch for possible investigation by office of Inspector General and date on which grievance was forwarded. The Inmate Agency Grievance Coordinator / designee, Inmate Branch, will (mandatory) language consult with office of Inspector General to determine if criminal investigation would be appropriate. If deemed appropriate, the grievance (will) be forwarded to office of Inspector General, to be handled in accordance with applicable SCAE policies. After investigation is completed review / investigation. If determined that criminal investigation is not required, the grievance (will) be processed accordance with procedure contained hereto. This also extends into same language for EMERGENCY GRIEVANCES in section 14.3, Apparent then, has suffered humiliation, significant abuse of power in grave violation of responsible, own, policy, due process, 14w, equal protection from (6) brazen conflict.

## ARGUMENT #4

"Threatening to inflict its retaliation  
substantially, the filing of a grievance is  
the first stage in taking from challenging  
conditions of confinement.

44. Booker V. SCD C 583 Kapp

Appellant, produces sufficient evidence that  
(1) enjoys the engaged in protected First  
Amendment activity, (2) [sic] McKnight took  
harsh and severe reprisal affecting [sic] First  
Amendment rights, (3) there was a causal re-  
lationship between [sic] protected activity and  
[sic] conduct." Constantine v. Rectore &  
Visfor of George Mason Univ., 411 F.3d  
474, 499 (4th Cir. 2005) McKnight's conduct

of harassment, threats, intimidation to change  
appellant resulted from him as disclosed re-  
porting her refusal to follow SDC policies, 1  
First Amend violation it was to cause him  
not to pursue section 15 grievance going  
to chief branch under criminal ~~harassment~~,  
for which her ~~if~~ her co-workers would

risk criminal charges for computer re-  
moving names and identification codes - 1  
punishable by prison ~~fine~~ or ~~both~~ 16-5-10

conspiracy against human rights  
similar language in 18 U.S.C. 242 Federal Statute  
C77

16-16-20(b) (b)

There can't be ~~formal resolution~~ exhaustion.  
 with respondents controlling the narrative.  
 The intentional, knowingly, deliberately,  
 - by respondents removing their names  
 and identification code is - is a per va-  
 side "calculated risk" of harm visited  
 upon appellant upon its face "premeditated."  
 Because respondent knows its the initiation  
 process under the 1st and 14. Amendment  
 to challenge "criminal or illegal conduct"  
 by them - its "egregiously" flagrant,  
 striking at its intended core - it un-  
 ponderably mindsets to shield them  
 saves from liability for not reporting,  
 or, worse - participation in covering,  
 criminal behaviors by them. Anyone  
 and appellant for the record before  
 this court does note "anyone" could be  
 the "staff" defaming, verification of  
 Warden, (G) General Counsel; just by  
 blackening the names and identification  
 from the computer. Respondents should  
 and General Counsel be sanctioned  
 for perjury before this court by test-  
 ifying the computer can't be altered.  
 coming with question in statement of issues  
 5 and 6 (b) before this styled court.  
 (8)

STATE OF SOUTH CAROLINA  
Administrative LAW  
court

The State of South Carolina  
FILED  
AUG 15 2025  
Administrative Law Court

#178039

Mr. Robert Graham, Jr.  
(Appellant)

C/A No: 2500579

vs.

SCDC

Respondent  
RECEIVED  
DEC 02 2025  
SC Court of Appeals

Initial brief  
Certificate of  
proof of  
(Service)  
pgs 1-9

I hereby certify that I have served this  
'initial brief of "Appellant"' by deposit -  
ing a copy thereof in the U.S. mail post-  
age prepaid and addressed to beneath  
parties

(A.L.C.)  
Edger A. Brown Bldg  
1205 Pendleton St.  
Suite 224  
Columbia, SC  
29201

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AUG 15 2025  
PCI MAILROOM

General counsel  
P.O. Box 21707  
Columbia, SC  
29221

This 14th day of Aug 2025  
CG

15) ~~Robert Graham~~  
Mr. Robert Graham  
Appellant  
(as served)  
AUG 14, 2025  
#178039

JUL 18 2025 INMATE GRIEVANCE FORM

DEC 02 2025

GRIEVANCE STEP 1

INMATE NAME: <u>178039 Robert Gray</u>	SCDC USE ONLY
SCDC NUMBER: <u>178039</u>	Grievance No. <u>IC-10686-25</u>
INSTITUTION: <u>Penitentiary</u>	Code: General <u>IC</u>
HOUSING UNIT: <u>Q3B1 (lot)</u>	Policy _____
WORK ASSIGNMENT: <u>Dorm</u>	Disc. Hear. _____
<u>TRU lock 275 F.3. d 405</u>	Class. _____
	PREA _____
	Date Received <u>7/18/25</u>
	IGC Initials <u>KM</u>

STATEMENT OF GRIEVANCE (Indicate the date of incident, and if the grievance is a challenge to SCDC Policy, specify which policy. Include supporting documentation and attach answered RTSM or Kiosk reference number.)

I file this Grievance in violation of section 1599V  
 ance criminal activity - so no informal resolution is  
 required. 16-16-20(b) of the SOUTH CAROLINA Code  
 of LAWS computer - Kiosk (shall) not be altered  
 data - communication. THE NAMES OF SCDC EMPLOYEES  
 has been altered and identification numbers  
 removed, I'm asking for them to be put back,  
 so that I can properly effectuate access &  
 address to the courts against SCDC institutional  
 in fractions. The word "STAFF" has been placed  
 in place of names and identification numbers.  
 This is criminal conspiracy to block proper re-  
 dress, prosecution, into courts (MAY LOING) from  
 abilities - STAFF is not persons for 1983 under color  
 of law violations. 16-5-10 criminal conspiracy  
 against human civil rights is punishable by prison or  
 prison or both (BOTH)

PLEASE NO RETALIATION  
 Grievant Signature Robert Gray Date 7-18-2025

ACTION REQUESTED: to prevent any further prosecution - or  
proceeding this grievance - put the names & identifi-  
cation numbers back please

ACTION TAKEN BY IGC:  PROCESSED  UNPROCESSED  OTHER

This grievance is being processed and returned due to not having a RTSM. Per SCDC GA-01.12-Inmates must make an effort to informally resolve a grievance at the institutional level by submitting a Request to Staff Member Form or ARTSM to the appropriate person within eight (8) working days of the incident. (in this case you need to submit a RTSM to Amy Hall at HQ) You must have a documented, answered, and signed RTSM form from the responsible authority attached to each grievance to proceed with the grievance process. Employees have up to 45 days to answer. Please consider this closed. Thank you.

K.M. Key 7/21/25  
 IGC Signature Date

DEC 2 2025

7/18/25  
copy

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

JUL 18 2025 INMATE GRIEVANCE FORM

STEP 1 INMATE COPY

Attachment  
7-18-2025  
K. McK...

INMATE NAME: 178039 Robert Graham  
SCDC NUMBER: 178039  
INSTITUTION: Penn Correctional  
HOUSING UNIT: Q3B1 (lat)  
WORK ASSIGNMENT: Dorm  
TRU LOCK 375 R3 d 403

OFFICE USE ONLY  
Grievance No. SC-1686-25  
Code: General JPTB  
Policy  
Disc. Hear.  
Class.  
PREA  
Date Received 7/18/25  
IGC Initials KM

STATEMENT OF GRIEVANCE (Indicate the date of incident, and if the grievance is a challenge to SCDC Policy, specify which policy. Include supporting documentation and attach answered RTSM or Kiosk reference number.)

I file this Grievance in violation of section 15999  
once criminal activity - so no informal resolution is  
required. 16-16-20(b) of the SOUTH CAROLINA Code  
of LAWS computer - Kiosk shall not be altered  
data - communication. THE NAMES OF SCDC EMPLOY  
EES has been altered and identification numbers  
NUMBERS, I'm asking for them to be put back,  
so that I can properly effectuate access &  
address to the courts against state institutional  
infraction. The word "STAFF" has been placed  
in place of names and identification numbers.  
This is criminal conspiracy to block proper re-  
dress, prosecution info courts (MELDING) from  
abilities - staff sent persons for 1983 under color  
of law violations. 16-5-10 criminal conspiracy  
against human civil rights is punishable by fine or  
prison or BOTH

Grievant Signature Robert Graham  
Date 7-18-2025

PLEASE NO RETALIATION

ACTION REQUESTED: to prevent any further prosecution - or  
proceeding this grievance put the names & ident:  
fication numbers back please

ACTION TAKEN BY IGC:  PROCESSED  UNPROCESSED  OTHER

This grievance is being processed and returned due to not having a RTSM. Per SCDC GA-01.12-Inmates must make an effort to informally resolve a grievance at the institutional level by submitting a Request to Staff Member Form or ARTSM to the appropriate person within eight (8) working days of the incident. (in this case you need to submit a RTSM to Amy Hall at HQ) You must have a documented, answered, and signed RTSM form from the responsible authority attached to each grievance to proceed with the grievance process. Employees have up to 45 days to answer. Please consider this closed. Thank you.

mail a paper RTSM to her K. McK... 7/21/25  
RECEIVED IGC Signature Date

INMATE COPY (CONTINUE ON REVERSE SIDE)

Dropped  
GMB  
AUG, 2025.  
IT  
Will exhibit  
lost material.

SCAC HAS NOT CENSORED THIS  
ITEM. SCAC DOES NOT CENSOR  
RESPONSES TO WRITTEN  
S. C. A. C. S. ENT

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

INMATE GRIEVANCE FORM

STEP 1

EMERGENCY

INMATE NAME: Robert Graham Jr	OFFICE USE ONLY
SCDC NUMBER: 178039	Grievance No. _____
INSTITUTION: Broad River cor.	Code: General _____
HOUSING UNIT: Multi 18 side	Policy _____
WORK ASSIGNMENT: Dorm	Disc. Hear. _____
Retaliation 95 # 3d 749	Class. _____
	PREA _____
	Date Received _____
	IGC Initials _____

STATEMENT OF GRIEVANCE (Indicate the date of incident, and if the grievance is a challenge to SCDC Policy, specify which policy. Include supporting documentation and attach answered RTSM or Kiosk reference number.)

Retaliatory Transfer gloving. Got no response from the first one. Second attempt at filing. Got no response from the first one. Saw Kiosk # 25-04092890, notified warden early, went to deputy that penny corrections. Mailroom Tamara Campbell refused to notarize or mail my legal mail to court for fabricated disrespect charges. I explained in the kiosk. This was retaliation, reprisal, for my self and other prisoners filing suits, and criminal charges against her for mail tampering, resulting mail denial, blocking access to supreme court, two days later, I was transferred to (BLC) charged with mailroom disrespect, canteen restrooms with phone for 30 days. Penney went to supreme court with phone administrator noted Attached, signed for Aug 2025, in the supreme court but mail went by found by creating substantial calculated risk of harm to clerk, injuries direct. Got no time barred retaliation. causing illegal detainment liberty interest criminal mis conduct.

Grievant Signature \_\_\_\_\_ Date 11-8-2025

ACTION REQUESTED: 18 U.S.C.A 246 18 U.S.C.A 242 10,000 fine Prison - or re-prison from prison - for conspiracy 16-5-10 intentional retaliation.

ACTION TAKEN BY IGC:  PROCESSED  UNPROCESSED  OTHER

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DEC 02 2025

SC Court of Appeals

IGC Signature \_\_\_\_\_ Date \_\_\_\_\_

(CONTINUE ON REVERSE SIDE)

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  - Adult Signature Restricted Delivery
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  - Signature Confirmation Restricted Delivery
  - Signature Confirmation Restricted Delivery

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ERH/PT 16

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SC Court of Appeals

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DEC 02 2025

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SC Court of Appeals

STATE OF SOUTH CAROLINA  
ADMINISTRATIVE LAW COURT

Docket 25-00519

Response to motion  
D-15-53-20

1 of 9  
notice/attached

#178039  
Robert Graham, Jr  
Appellant  
vs. JOEL Anderson,  
Earl J. Early Jr  
South Carolina Dept.  
of Corrections  
William Davis  
(Respondent)  
ET AL

Certificate of Service  
Docket No. 23-ALJ-04-  
0488 - App  
under Article I Section 23  
Reply brief, motion  
for a video hearing  
hearing; pursuant  
"Emergency Substantial"

DATE 10/21/2025  
§ 15-53-20.

Declaration  
I, Robert Graham,  
Personal Affiant  
under penalty of perjury based upon  
personal knowledge believe information  
the following "attached" herewith are  
true and correct herewith  
deposited in  
§ 15-53-20.  
\$1

injury, exhaustion,  
deprivation un-  
lawful process  
Section 15-14.1, 15.1

28 U.S.C.A 1741

OCT 21 2023

Officer General Counsel  
South Carolina Dept Corrs  
4444 Broad River Rd.  
P.O. Box 21787  
Columbia SC 29221

Hon. Robert L. ...  
South Carolina Dept Corrs  
Edgar A. Brown  
Sust 224  
Columbia, SC  
209201  
Administrative Law Court

(COPY)

48  
STATE OF SOUTH CAROLINA  
IN THE ADMINISTRATIVE  
LAW COURT

10 #178039  
Robert Graham  
Appellant

vi  
South Carolina Dept  
of Corrections  
Respondent

10-11-2025  
10-11-2025  
10-11-2025  
Docket No.  
25-ALJ-04-057A-1J  
Continuum No  
PCT 080-25  
Hon. Robert C.  
Reibold

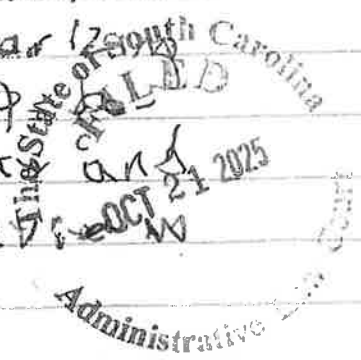
10-11-2025  
Appellant's Reply  
Brief

STATEMENT OF CASE / FACTS

Appellant in the above stated matter  
respectfully directs the court (ALC  
or "court") to the correct statutory  
authority it has to hear this case.  
And not arbitrary, or capriciously just  
discuss it upon - it's force would be  
contrary rule of jurisdictional law.

Article I Section 22

is the correct and proper standard  
of authority, jurisdiction over  
this court to act on appellant's  
half in the interest of justice and  
fundamental law - judicial review



10/3

## STANDARD OF REVIEW

The ALJ's jurisdiction to hear this matter - has already been addressed "this court is [skilled] at interpretation of legislative intent in terms of whether or not it has power to act or address things if not all of appellant's claims, under Article Section 22

Respondents are correct in statement of case. on July 18, 2025, appellant humbly filed stipulation pleading with code to simply place their [employees] names and bid on it. Section code back into the system computer. Appellant "graciously" point out code state of south carolina law provisions of law governing prohibiting them from hiding - removing, adding - or tampering with the ~~On-line~~ computer - quoting 16-16-20 (b)(1), 16-5-10 - Conspiracy state statute in which code is supposed to be governed by under policy and procedures as statutory law abiding officer staff - subordinates -

1 of 4  
Appellants. Simply etc notably for  
identification names - and legitimate  
identification code would be put back  
as his resolve to the Git was  
instead he was met with grace  
inflammatory in suits' comments,  
you're an "inmate" you don't run -  
nothing" we're not putting anything  
back." Hmm... mm... appellant now  
finds himself in proper form before  
the court. Not intending to run...  
anything - or asking for any favor.  
Just law upheld will suffice,  
pursuant to Booker vs Soc - 583  
F app 44 it is well established  
the "Crack" respondents unstatutorily  
removed their names and identifica-  
tion codes from - prohibits" harassment  
frustrates, abuses and makes the  
appellant attempt at getting in formal  
resolution - which is fundamentally  
the first stage of filing a complaint  
law suit" respondents replacing in  
the computer a word like "STAFF" in  
popping up shields from from law  
bills under U.S.C.A 42 1983  
destroying appellant state - created liberty interest  
the process of law exhaustion remedies -

1065

## Argument # 1

Appellant was "alleging" criminal activity against ~~any~~ classification, ~~such~~, Clayton Holbrooke's Stacy Richardson state classification, misappropriation of public funds pursuant to 2020 omnibus" crime - re-codified statute - the Enacted, suddenly, for the first time call's respondents public names and identification codes was removed & placed with "staff" He had to file Step 1 - under "criminal allegations" pursuant 16-16-2001(b), which respondent completely left out of the "Statement of Case" standard of review, including 16-5-10 concerning state statutes.

Section 15 Governance "alleging criminal Activity (any governance - will be [immediately] referred to the Agency Inter Governance coordinator/designer, which she, IBC McConight refused to comply with because [employees] in the agency conspired re moving names - & in General Council" Every one egregiously became on the

Convincing Computer "Staff" instead of persons according to liability under U.S.C.A 42 1983 "frustrating appellants' natural rights to file and prevail on actionable claims.

10/10

Administrative Law court's contain them  
as appellate "state created" liberty in  
trust to first exhaust his admin-  
istrative remedy before attempting  
to file U.S.C.A. 1983, pursuant  
1997(A), otherwise State - and  
high court would procedurally dis-  
miss action" this is "sufficient  
to then trigger procedural due pro-  
cess guarantees tenfold. It is  
then-miss/leading for respondents  
to attempt at diverting the courts' at-  
tention from the "core" of the  
matter - the state created liberty,  
due process protected right falls  
squarely on appellants behalf; where  
respondent arbitrarily and capriciously  
controls the narrative of criminal  
conspiracy to prevent thwart hinder  
him from proper administrative ex-  
haustion for purpose of high court  
having jurisdiction or "C.A. 10" or  
"court" itself) Allen v. State Dept  
of Corr. is improper - Appellant points  
courts attention to a case protected interest  
where his claims have landslide legiti-  
macy" Dawson v. U.S. 549 Fsupp  
2d 736

# Retaliation

#2

1 pff  
Complaints to Supervisors or management employees concerning harassment or discriminatory treatment as well as informal complaints, filing of internal grievance under Emergency Section 400.8, Section 15.14.1 - Krosk Interference, with informal resolve, to agency heads are included within the definition of "protected activity," as required to establish liberty protected state-created interest; where reported false drastic unfounded retaliatory measures - to block, hinder, appear or getting internal resolution - creating significant hardship - because they know all so well; like with all their hand slides of court admonishments for thwart informal resolve. The process is not available - for internal challenging appellate unlawful detention confinement. A clear state created due process liberty protected interest before the experienced skilled court. This action is injurious from exhaustion remedy access to court thus, appellant has no proper remedy for redress.

1 of 8

## Argument #3

U.S.C.A. 42 / 1983"

The term "state-created liberty interest" is not really broad on its face - and only takes pointing to "specific" [words] in any statute - to establish deprivation of a right, interest encompassed by the 14th Amendment to South Carolina state / federal constitution invoked by this state and the United States its territory boundaries, usage, principles, custom, regulations. one of the [words] in the above amendment constituting state protected created liberty interest deprived appellant is "person" government officers - state employees - agency heads for purpose of this amendment (only recognizes colorable claims in this regard by someone under color of [state] to be under color of state for this purpose liability for misconduct you can only be legally sued as on "person" state "not included in this... amendment" depriving appellant exhaustion remedy for purpose of actionable 1983

5 of 8

## CONCLUSION ARGUMENT

This case should not be summarily dismissed under § 40.8 Emergency procedures. The emergency procedures shall not include review by a person IGO: McKnight at purely constitutional included review by a person or entity not under the supervision or control of the institution - including broad river correction institution - this is clear statutory unambiguous wording in the language for legislative intent; respondent is asking for this court to aid state in flagrant "brazen" grant of dismissal contrary to controlling law even state policy - which, apparently, they did obey violated section 15 of appellant's state-created policy instead not to send "innocently" nature of criminal activities to chief branch for processing of the same criminal activity before this court; blocking this procedure injured, frustrated substantially appellants - exhaustion proper now under article 1 section 22, Appellant wants to get emergency immediate assistance was taken from him to cover prevent him to getting sufficient guaranteed procedural process from being properly noticed and heard.

# "THE RIGHT TO BE HEARD"

9079

Final  
conclusion

since it is clear state did violate procedural due process "safeguards" to prevent his claims of criminal nature from [guaranteed] secured protected "immediately emergency assistance, outside not under the supervision or control of the institution the damage is irreparable - triggering "Tullock v. French" 275 F.3d 405 4th circuit decided Dec 28, 2001,

RECOP and STRCP (2006), when appellant alleges facts in complaint beyond conclusory - or mere-conjecture courts take it into *de novo* - on appeal. Respondents know the prison "kiosk" contained *misclassified* [misconduct] removing names - *identifiable* - knowingly, she liberally, intentionally, was to [the result] appellant access to court prevent being called into question before this or any court of accountability for their misconduct 16-5-10 they then conspired under Rico enterprise *conspiracy* to appellant's rights, motion to dismiss is improper "Emergency relief" is proper under article 1 Section 22.

State of South Carolina  
2025  
Administrative

RECEIVED SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

JUL 18 2025 INMATE GRIEVANCE FORM

GRIEVANCE

STEP 1 INMATE COPY

7-18-2025  
R. J. J.  
K. M. K.

INMATE NAME: <u>178039 Robert Graham</u>	OFFICE USE ONLY
SCDC NUMBER: <u>178039</u>	Grievance No: <u>PGI-168625</u>
INSTITUTION: <u>Penn Correction</u>	Code: General <u>IPIS</u>
HOUSING UNIT: <u>Q3B1 (at)</u>	Policy _____
WORK ASSIGNMENT: <u>Dorm</u>	Disc. Hear. _____
<u>TRU LOCK 275 R.3. d 405</u>	Class. _____
	PREA _____
	Date Received <u>7/18/25</u>
	IGC Initials <u>KM</u>

STATEMENT OF GRIEVANCE (Indicate the date of incident, and if the grievance is a challenge to SCDC Policy, specify which policy. Include supporting documentation and attach answered RTSM or Kiosk reference number.)

I file this Grievance in violation of Section 15912 once criminal activity - so no informal resolution is required. 16-16-20(b) of the SOUTH CAROLINA Code of LAWS computer - Kiosk shall not be altered data - communication. THE NAMES OF SCDC EMPLOYEES has been altered and identification numbers, I'm asking for them to be put back, so that I can properly effectuate access & address to the courts against SCDC institutional infractions. The word "STAFF" has been placed in place of names and identification numbers. This is criminal conspiracy to block proper address, prosecution, info courts (MISLEADING) from abilities - staff inst persons for 1023 under color of law violations. 16-5-16 criminal conspiracy against human civil rights is punishable by prison or BOTH.

PLEASE NO RETALIATION

Grievant Signature: Robert Graham Date: 7-18-2025

ACTION REQUESTED: To prevent any further prosecution - or processing this grievance put the names & identification numbers back please

ACTION TAKEN BY IGC:  PROCESSED  UNPROCESSED  OTHER

This grievance is being processed and returned due to not having a RTSM. Per SCDC GA-01.12-Inmates must make an effort to informally resolve a grievance at the institutional level by submitting a Request to Staff Member Form or ARTSM to the appropriate person within eight (8) working days of the incident. (in this case you need to submit a RTSM to Amy Hall at HQ) You must have a documented, answered, and signed RTSM form from the responsible authority attached to each grievance to proceed with the grievance process. Employees have up to 45 days to answer. Please consider this closed. Thank you.

mail a paper RTSM to her K.M. K. 7/21/25

IGC Signature: \_\_\_\_\_ Date: \_\_\_\_\_

INMATE COPY (CONTINUE ON REVERSE SIDE)