

SEP 21 2026

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

SC Court of Appeals

IN THE COURT OF GENERAL SESSIONS

THE STATE OF SOUTH CAROLINA,

NINTH JUDICIAL CIRCUIT

v.

ALAN G. NIX

Defendant,

**DEFENDANT'S SECOND MOTION TO
RESCHEDULE JASON TURNBLAD'S
MOTION FROM LIKE 31 JUL 2026
AND/OR SET ASIDE ANY ORDER
RELATED TO TURNBLAD'S MOTION**

Arrest Warrant No(s): W-10-25-0120
W-10-25-0365

Indictment No(s): 2023-GS-10-05003

TO: COUNTY OF CHARLESTON, STATE OF SOUTH CAROLINA, OFFICER OF THE
COURT ELIZABETH FINECY, DIRECTOR GADSDEN, ALAN WILSON, SCARLET WILSON,
JASON TURNBLAD, ETC., ETC., ETC....

PLEASE TAKE NOTICE, Defendant Alan G. Nix hereby submits this motion to reschedule
Jason Turnblad's motion from the last few days.

All attachments included with this request are incorporated by inclusion.

BACKGROUND

1. On 18 May 2026 at approximately 1100 Kelly Solar gave me a small piece of paper with
Jason Turnblad's phone number on it and instructed me to wait a couple of weeks to call him. Ms.
Solar and I were both in a courtroom at the Charleston County Courthouse when she gave me this small
piece of paper and she had just taken a phone call from some currently unknown person who provided
her Turnblad's contact information. (See exhibit A) (NOTE: I am still waiting on Kelly Solar to
provide the name of the person that called her 18 May 2026 and gave her the information contained in
exhibit A)

2. On 9 Jun 2026 at 1357 I called the phone number Kelly Solar had provided me on 18 May
2026 and was informed by the man that answered that Jason Turnblad had not worked at that law firm
in approximately thirteen years.

3. Shortly after finishing the phone call to 843-623-5911 on 9 Jun 2026. I mailed a letter to Kelly Solar and Cameron Blazer informing them of the issue with the contact information they had provided for Jason Turnblad. Exhibit B.

4. Within two hours of mailing Kelly Solar and Cameron Blazer the 9 Jun 2026 letter, Bethanie Diaz and Colton Sheriff personally hand delivered to me exhibit C.

5. Since Ms. Diaz's 9 Jun 2026 letter required me to contact Mr. Turnblad no later than 12 Jun 2026, I mailed the motion (exhibit D) included with this motion to Mr. Turnblad, and others, on 12 Jun 2026. My phone number is clearly listed on the 12 Jun 2026 motion.

6. I thought Ms. Diaz had scheduled a conference call for a number of us on ____, including but not limited to Jason Turnblad, but that conference call did not occur as expected.

7. On 10 Jul 2026, I mailed a conference call notice to a number of us, including but not limited to Jason Turnblad, for 1315 on 14 Jul 2026. Exhibit E

8. On 14 Jul 2026, when Mr. Turnblad did not call into the scheduled conference call, I called Mr. Turnblad and left him a phone message. (1324)

9. On 17 Jul 2026, after speaking with Matthew Buchanan, and finding out that Matthew had suddenly developed some type of ethics, I called Mr. Turnblad twice asking for help. (0930 and 1006)

10. Once it became apparent on 17 Jul 2026 that Mr. Turnblad also wasn't not going to respond to these phone calls, I mailed him a letter. Exhibit F.

11. On 21 Jul 2026, given I had never heard from Mr. Turnblad, including during the over five weeks since I had mailed him a copy of exhibit D, and there was less than three weeks before what I was led to believe was a PROBATION/ COMMUNITY SUPERVISION PROGRAM (CSP) VIOLATION hearing scheduled on 10 Aug 2026, I stopped by 1540 Russell St., Orangeburg, SC 29115 to figure out if Mr. Turnblad existed.

12. I arrived at 1540 Russell St., Orangeburg, SC at approximately 1155 and parked in what I believe to be the parking lot behind the building. I first looked at a board / plaque mounted to the outside wall and did not find Mr. Turnblad's name. I then went inside the building (1156) and reviewed a directory board in the first story hall of 1540 Russell St. and also did not find Mr. Turnblad's name listed. While searching the board in the hall of 1540 Russell St. for Turnblad's name, I heard voices coming from behind me. I turned and went to the other side of the hall and looked into the two opposing office doors attempting to determine where the voices were coming from. While doing that, a male voice spoke to me from behind. I said I was looking for a Jason Turnblad and the person that had

spoken to me from behind said he was Jason Turnblad. At that point I said I was Alan Nix and Mr. Turnblad walked out of what now appears to have been someone else's office and past me into what was his office. While he was walking past me to clear off a desk chair on the opposite side of his desk for me to sit in, he began buttoning the buttons on the sleeves of his shirt (which were not rolled up but just hanging down and not buttoned) and tucking the side of his shirt tail into his pants which was hanging out of one side of his pants. (Mr. Turnblad's sloppy appearance at noon on a Tuesday afternoon raised substantial questions about his general health. A hand written note on his ex-wife's copy of the 25 Jul 2026 letter asked if she might have any insight to what might lead to such appearance and conduct)

13. I told Mr. Turnblad I just stopped by to make sure he got my letter from the previous Friday and made a turn to exit his office. Mr. Turnblad asked me to take a seat in the chair he was clearing out and went around his desk to sit behind it. A few key points from that approximately sixteen minutes of discussion.

- Mr. Turnblad had a folder on his desk which he picked up and suggested was related to me. This folder was obviously quite thin.

- Mr. Turnblad stated he did not have a copy of the 17 Oct 2025 motion to dismiss I had filed nine months earlier.

- Mr. Turnblad started asking very basic questions indicating to me that he had very little knowledge of the case.

- Mr. Turnblad stated he had talked to someone at the County of Charleston probation office but stated he did not remember the person's name. When I asked him if this person was a male or female, he appeared unsure but then seemed to decide to say the person was a male. He said this person had indicated to him that they did not think I used drugs.

- Mr. Turnblad stated he had talked to someone in Columbia, SC with the probation department. When I asked him that person's name he would not provide that person's name. I took it that the person Turnblad had spoken with in Columbia was Matthew Buchanan.

- Mr. Turnblad confirmed that he had the letter I had mailed to him the previous Friday but then asked me to restate what I had written in the very same letter he said he had. This conduct seemed extremely odd.

- Mr. Turnblad said he expected more documents about me the next week. Eg. week of 27 Jul 2026. He did not say what those documents were or where they were allegedly coming from.

- Mr. Turnblad said he would be out of the office on vacation between the coming Thursday (24 Jul) through the following Monday (27 Jul) and that he would contact Buchanan when he returned from vacation and get back with me on the 29th of Jul about the two issues cited in the 17 Jul 2026 letter. exhibit F

- when I asked Mr. Turnblad if he knew what a probation form 1239 and/or form CIP11 was, Mr. Turnblad replied that he had been practicing criminal law for 20 years.

- when I asked Mr. Turnblad again a couple minutes later if he knew what a probation form 1239 and/or form CIP11 was, he again replied with the apparent fact that he had been practicing criminal law for 20 years. I took this second evasive answer to mean that Turnblad had no idea what probation forms 1239 and/or CIP11 were and that he did not have any in the folder he said was related to me.

- Turnblad stated he was planning on calling me soon. I took this comment to mean that he might have called me sometime during the next week or so if I had not come to his office on 21 Jul 2026.

- I left Turnblad's less than pleasant office at 1216.

14. After considering Mr. Turnblad's sloppy dress, lack of general knowledge about probation, his clear lack of diligence related to my case(s), his evasiveness related to who he had previously spoken to about me, his apparent inability to even remember if the person he spoke to in Charleston was a male or female, and his unwillingness to take ten minutes to send Buchanan a quick email during the next one and a half business day before he said he would be leaving for vacation, I decided to send him the letter dated 25 Jul 2026. Exhibit G.

15. After not hearing from Turnblad on 29 or 30 Jul 2026, as he had stated he would do on 21 Jul 2026, I called Turnblad at 1205 on 4 Aug 2026 and left him a phone message. Turnblad called me back (for the first time ever) at 1226 and since I was driving at the time I missed that call but pulled over as soon as I could and called Turnblad back at 1229. At this point Turnblad stated he had filed a motion to be relieved the previous Friday along with a motion for a continuance for the apparent 10 Aug 2026 PROBATION/ COMMUNITY SUPERVISION PROGRAM (CSP) VIOLATION hearing.

He also said he had mailed a copy of his 31 Jul 2026 motion to be relieved to Buchanan and I the previous day (3 Aug 2026).

16. About 1430 on 4 Aug 2026 I mailed a letter to Ms. Holmes, with copy to several others, including but not limited to Turnblad, asking to her use her incredible powers to manipulate schedules to reschedule the PROBATION/ COMMUNITY SUPERVISION PROGRAM (CSP) VIOLATION hearing apparently scheduled for 10 Aug 2026 so I could have enough time to get a copy of Turnblad's motion and respond to it appropriately. Exhibit H.

17. I missed a phone call from Turnblad at 1504 on 4 Aug 2026.

18. I returned the missed call from Turnblad at 1604 in which he stated he wanted to make sure I knew that the preliminary hearing for the next day (which had only been scheduled seven days prior) was still scheduled but that he would be calling in and telling them he had filed a motion to be relieved. I told Turnblad I had already mailed a request to continue the next Monday alleged PROBATION/ COMMUNITY SUPERVISION PROGRAM (CSP) VIOLATION hearing based on what he had said during lunch earlier. (Exhibit H)

19. I missed a phone call from Turnblad at 1623 on 4 Aug 2026.

20. I returned Turnblad's missed phone call at 1701 and Turnblad stated he had spoken with Roger Young and that Roger Young had stated that Judge Maddox would be hearing his motion to be relieved on 10 Aug 2026.

21. I mailed a more formal motion about 10 Aug 2026 on 5 Aug 2026 via Fedex and USPS. Exhibit I.

22. Turnblad called into the highly inappropriate / unethical Grant Ketner preliminary hearing on the morning of 5 Aug 2026.

23 I mailed an ethics complaint letter about Ketner on 8 Aug 2026, in which Turnblad is expected to also provide a response / complaint about what he saw Ketner commit on the morning of 5 Aug 2026. (exhibit J).

24. After not hearing anything else from Turnblad post the Ketner incident on 5 Aug 2026, I went to the County of Charleston Courthouse on the morning of 10 Aug 2026. I arrived at 0910 and filed a copy of the 5 Aug 2026 motion at 0911 since Fedex had still failed to deliver the motion as scheduled the previous Friday.

25. The majority of what occurred on 10 Aug 2026 starting at approximately 0916 is documented in Ex. K, dated 11 Aug 2026. (Letter to Maddox with RE: line of “notification of issue / false statement(s) yesterday)

ISSUE 1 – Violation of Rule 1.4: Communication

26. the above background establishes that despite Turnblad having Nix’s contact information for at least five weeks, and with an important hearing allegedly scheduled within three weeks of 21 Jul 2026, Turnblad did not attempt to contact Nix.....but did contact other people. On information and belief, Turnblad’s lack of communication with Nix between 16 Jun 2026 and 21 Jul 2026 was willful and likely meant to knowingly cause Nix issues in defending himself against Franqui’s, Buchanan’s, Finnecy’s, etc. misconduct related to arrest warrants W-10-25-0120, W-10-25-0365 and the improper Rode 8 Dec 2025 bench warrant.

ISSUE 2 – Violation of Rule 1.1: Competence

27. It was clear within fifteen minutes on 21 Jul 2026 that, despite Turnblad’s proclaimed claim to fame of practicing criminal law for twenty years, which most likely is not an accurate statement, he did not have a basic understanding of probation processes and forms. This was the case despite having had at least five weeks notice, having contacted people in Charleston and Columbia already, and having access to a significant amount of information that Nix had written himself before and during his more than one hundred days of illegal incarceration starting on 11 Dec 2025.

28. If Turnblad’s previous “performance” was not proof enough of his incompetence, he apparently thought he wanted to prove such when he wrote the following two sentences at the end of his sworn 7 Aug 2026 “AFFIDAVIT IN SUPPORT OF MOTION TO BE RELIEVED”. *“If Defendant was a privately retained client of mione, I would have returned his fee and encouraged him to seek other counsel. However, since I am appointed under Rule 608, the filing of this Motion was my only recourse.”* First, the misspelling of “retained” and what I assume was supposed to be “mine” in that quote are done to be true to what Turnblad, or someone on his behalf, wrote on or about 7 Aug 2026. However, more importantly, based on Turnblad’s statements, Turnblad seems to believe that if I, or for that fact, anyone else, had hired him to represent them in a criminal case and he decided he wanted to quit, all that he would have to do is give them their money back and encourage(d) them to seek other counsel. On information and belief, for an attorney to be relieved as being someone’s attorney in a criminal case in South Carolina, whether appointed or “privately retained”, requires that attorney to

serve a motion on the State and the non-moving defendant or attorney laying out some good cause ground for being relieved.

29. In Turnblad's defense about his incompetence about being relieved, when I spoke to Hervery Young about these two sentences yesterday (17 Aug 2026), Mr. Young seemed to also believe no motion to be relieved was required for a privately hired attorney representing a criminal defendant to quit their representation. Mr. Young seemed to believe that such quitting was all based on whatever was in the attorney's and defendant's contract. On information and belief, for an attorney to be relieved as being someone's attorney in a criminal case in South Carolina, whether appointed or "privately retained", requires an attorney to serve a motion on the State and the non-moving defendant or attorney laying out some good cause ground for being relieved.

30. On information and belief, Turnblad's motion to be relieved did not lay out any good cause ground(s) for being relieved.

ISSUE 3 – Violation of Rule 1.3: DILIGENCE

31. Based on what Turnblad knew, and more importantly what he did not know, on 21 Jul 2026, it seemed likely even on 21 Jul 2026, that Turnblad:

- a. was not knowledgeable about basic probation forms, processes and laws and had not taken much, if any, action to remedy his knowledge gap.
- b. had not taken the obvious step of asking his law school buddy Cameron Blazer and/or Kelly Solar for a copy of their files about these issues.
- c. had not made any effort in over five weeks to try to contact Nix.
- d. was, at most, very minimally, aware about Nix's earlier case.
- e. didn't even have a copy of Nix's motion to dismiss from 17 Oct 2025.

ISSUE 4 – Material Omissions / Misrepresentations in 7 Aug 2026 AFFIDAVIT

32. Mr. Turnblad states in the first sentence of the second paragraph that *"After that visit, Mr. Nix followed up with phone calls in which he was still fixated on civil issues and his desire for me to help him with his civil suits. I told him I was concerned with his criminal charges, as that is what I was appointed for."* On information and belief, what Mr. Turnblad refers to as "that visit" in that sentence is 21 Jul 2026. The next "phone call" I made to Mr. Turnblad was at 1205 on 4 Aug 2026 and that wound up being a voice mail to Mr. Turnblad since, as was his custom, he did not answer his office

phone. The voicemail at 1205 was simply following up on what he (Turnblad) had stated on 21 Jul 2026 he would get back with me on no later than the previous Thursday (30 Jul 2026).

33. As stated previously, Mr. Turnblad called me at 1226 on 4 Aug 2026 which I could not answer.

34. When I called Mr. Turnblad back at 1229 on 4 Aug 2026, Mr. Turnblad stated he had filed a motion to be relieved and motion(s?) for a continuance. There was no discussion about "civil issues" and / or "his desire for me to help him with his civil suits."

35. Likewise, it seems ludicrous for Turnblad to next say that *"I told him I was concerned with his criminal charges, as that is what I was appointed for."* given he had already filed a motion to be relieved and was clear he didn't want to discuss anything with me, including but not limited to, his motion to be relieved. (Mr. Turnblad admits this is a false statement at the end of paragraph two on page two when he states *"I filed the Motion, mailed a copy to the Defendant, and have only spoken with him since to inform him of court dates and time and my motion."*)

36. At the bottom of page number two of Turnblad's highly questionable AFFIDAVIT IN SUPPORT OF MOTION TO BE RELIEVED, Turnblad states that there has been a "complete breakdown in the Attorney-Client relationship" This part of this statement appears to be, at best, a gross exaggeration, and more likely than not, an intentional misrepresentation to the court, since at the time Turnblad signs this "AFFIDAVIT IN SUPPORT OF MOTION TO BE RELIEVED, the extent of our discussions was limited to approximately 16 minutes on 21 Jul 2026 (initiated by me), less than two minutes on 4 Aug 2026 (informing me of his motion to be relieved) and less than three minutes on the morning of 5 Aug 2026 prior to the 0900 Ketner incident. (eg. less than twenty minutes total) I seriously doubt most reasonable people would consider this level of interaction as remotely qualifying as a meaningful "Attorney-Client relationship" and allege that given the lack of information Turnblad includes in his AFFIDAVIT was included to be misleading.

**ISSUE 4 – How is Solar's egregious legal malpractice (best case)
and Turnblad's issues legitimately held against me?**

37. Buchanan seemed to try to make the case this past Monday that Solar being relieved in May, when she requested it first and I made the case that she had already committed, at a minimum, egregious legal malpractice, and Turnblad quitting, was my fault and their issues should somehow be my liability. While this sort of (mis)conduct / retaliation by Buchanan appears to be an ongoing

problem with him, I contest that I should be held responsible for, or subjected to any penalties for, Solar's and Turnblad's (mis)conduct.

ISSUE 5 – What kind of attorney can / does someone get for less than \$1500?

38. Melissa Gay is an attorney in Charleston that "represents" a lot of people in criminal court, including probation cases. When I spoke to Ms. Gay back in like February to try to get her to get Rode's and Buchanan's improper 8 Dec 2026 bench warrant lifted, I think she wanted \$2500.00 to just do that. (Ms. Gay also stated during this phone call that preliminary hearings were not required for alleged probation violations.....which I took to be just more proof.....)

39. Hervery Young suggested yesterday that he pays people like Turnblad, at most, like \$1500.00.

40. Ms. Gay is known to be on the bargain basement end of criminal attorneys for low fees, and for those low rates, she is known to provide similarly low capabilities / "representation".

41. It appear that attorney's like Turnblad are willing to accept like half of what Ms. Gay is willing to accept.

42. Consequently, (a) should Turnblad's level of performance (eg. seriously low) be a shock to anyone routinely involved in the legal system in South Carolina? (b) does Mr. Young's and Mr. Ryan's very low level of payment to attorneys like Turnblad to "represent" defendant's , almost by default, substantially guarantee the likely violation of one or more constitutional protections of such defendants?

ISSUE 6 – No jurisdiction for hearing on 10 Aug 2026

43. See letter dated 11 Aug 2026.

44. My name was not on Judge Maddox's list of cases on 10 Aug 2026.

45. My name was not on the list downstairs in 3B on 10 Aug 2026.

46. On information and belief, my name was not on any list at the Charleston County courthouse on 10 Aug 2026.

47. Less than a weeks notice is inappropriate for a hearing.

48. Turnblad intentionally concealed his AFFIDAVIT IN SUPPORT OF MOTION TO BE RELIEVED from Nix to prevent Nix from filing a response. (He could have at least given me a copy

at 0924 when he walked by me on 10 Aug 2026...but clearly decided not to for another 41 or so minutes)

49. On information and belief, Turnblad had inappropriate conversations with Judge Young on 4 Aug 2026.

50. On information and belief, based on Turnblad's inappropriate conversations with Judge Young on 4 Aug 2026, Judge Young supposedly scheduled Turnblad's motion to be relieved on Maddox's calendar for 10 Aug 2026. However, there is no evidence this actually legitimately occurred.

51. On information and belief, based on Judge Young's previous February 2026 recusal, Young had no jurisdiction to schedule anything related to Nix on Maddox's list or any other judge's list.

52. I relied on untrue statements made by several people about 10 Aug 2026, including but not limited to, Carl Ritchie's employee Bennett and the currently unknown lady sitting to my eight o'clock which stated my name was on the list downstairs.

53. Turnblad stated on 10 Aug 2026 that Hervery Young had planned on being at the County of Charleston courthouse on 10 Aug 2026. Mr. Young stated yesterday that he had not seen Turnblad's email about the date for his motion until after 10 Aug. However, Mr. Young stated he had planned on coming and asking for some serious sanctions against me. Certainly Mr. Young (and I also would like Mr. Young to have the opportunity to do so) would like to have the opportunity to do as he said he had planned on doing yesterday and make his case for sanctions against me prior to any legitimate ruling on Turnblad's very questionable MOTION and AFFIDAVIT.

WHEREFORE, Defendant respectfully requests the Court to:

1. reschedule Mr. Turnblad's motion from 31 Jul 2026 to sometime after Labor Day.
2. If Maddox went ahead and did something on or after 10 Aug 2026, set aside any such order or ruling.
3. Allow Mr. Turnblad to explain and/or clarify issues with his 7 Aug 2026 AFFIDAVIT and allow Nix time to review and respond before any such hearing.
4. Properly sanction Mr. Turnblad for his (mis)conduct.
5. Allow Nix to amend this motion once the transcript and any other information from 10 Aug 2026 is available.
3. any other and further relief as the Court deems just, prudent and proper.

18 August 2026

Respectfully submitted,

Alan G. Nix
c/o Michael & Taryn Lazroff
(and still homeless but still trying to find a
relatively honest person to help fix all of the
corruption which caused homelessness)
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