

SOUTH CAROLINA COURT OF APPEALS

Timothy Cozens #115830
✓ Plaintiffs,

Lt. Franklin Richardson Jr. +
Defendants

RECEIVED

APR 07 2015

SC Court of Appeals

CASE NO: 2011-CP-31-01
87
Motion for Attorney
Robert Butcher to turn
over all files, documents
affidavits, statements
declarations, pictures
motion every medical
documents etc.

Plaintiff moves this Honorable Court for his old Attorney
in this case to turn over all files records in his
case against Lt. Franklin Richardson Jr. defendants
(S.C.D.C.) Attorney Robert Butcher represented
Plaintiff in the Court of Common Pleas on a Tort
claim. Plaintiff needs all files to perfect his appeal.
Plaintiff prays that this Honorable Court order
Robert Butcher to turn over all files picture as
represented by law. Plaintiff have sent him

LEGAL MAIL

NUMEROUS letter AND ALSO motion this court for
him to loan over all documents so Plaintiff can
Perfect his appeal. Plaintiff gave Attorney all
grievances and declarations against Lt. Franklin
Richardson Jr. and statements. BECAUSE every time
the institutional shakedown would come and shake
his room down he would lose documents + statements
Also Plaintiff sent Attorney Robert Butcher some
medicine that the doctor had gave him that almost
killed him. I sent him statements from other
inmate about the assaults of Lt. Franklin Richardson
Jr. About 12 statements declarations about
his assaults. My Attorney sent it back to
the institution with everything in it medicine
and statements. They went into mail sent to
Attorney Robert Butcher.

The investigator, CAPTAIN, OFFICER CLEMENS SAID
THAT MY ATTORNEY REFUSED AND SENT IT BACK TO
THE INSTITUTION THEY SAID IN THE REPORT.
I ASKED ROBERT BUTCHER DID HE SENT IT
BACK TO THE INSTITUTION. HE SAID NO I SAID
HE NEEDS FILE AGAINST THESE PEOPLE BECAUSE
THEY DIDN'T ~~SEND~~ SEND THE LETTER OUT. WHY DIDN'T
HE MAKE THEM GIVE UP THE DOCUMENTS
AND STATEMENTS. OFFICERS & A NURSE TOLD ME
HE WAS SELLING ME OUT. AND THAT HE
WAS THE WORST LASCAR THEY EVER SEEN.
I NEED THESE FILE TO PERFECT MY APPEAL.
I PRAY THIS HONORABLE COURT WILL ORDER
ATTORNEY ROBERT BUTCHER TO SEND ME ALL
FILES PERTAINING TO MY CASE PER SUPREME
COURT RULINGS.

LEGAL MAIL

They were killing me if it wasn't for
LODD AND Mr Micheal McCall shipping me
HEAR I would be dead by now. At D.H.O.
SHARON PATTERSON AT HEARING they lost the
ENVELOPE MED. CASE AND ALL STATEMENTS.
That suppose to be put away AS EVIDENCE
I requested it. They found me guilty
without the evidence, which was
thrown away. SEE D.H.O hearing TAPE
AND TRANSCRIPT.

Samuel Damm

LEGAL MAIL

KRM 1254

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INCIDENT REPORT

#77

NM4

13-10-045

Page 1 of 1

Institution/Center: Lee CI		Time of Report: Approx 12:30 PM	
Date of Report: 4 Oct 2013		Date of Incident: 4 Oct 2013	
Reporting Official: C/O Plemons		Time of Incident: Approx 11:30 AM	
Location of Incident: Contraband		Employee(s) Involved:	
Inmate(s)/Resident:	SCDC#	Age	Race
1. Green, Timothy	113830		
2. -			
3. -			
4. -			
5. -			

1. Inv. Tisdale
2. LPN Dixon
- 3.
- 4.
- 5.

On the above date and approximate time: I, C/O Plemons received an envelope from Inv. Tisdale that was returned to the mail room unavailable to be delivered. Inside was two SCDC medical envelopes for IM Green, Timothy # 113830. LPN Dixon was asked and confirmed that the medication was prescribed to IM Green and were the medication that was on the label. IM Green will be charged being that he was not taking the medication as he was prescribed.

IM Green, Timothy # 113830 is charged with 903 The Trafficking, Use, and/or Possession of Narcotics, Marijuana, or Unlawful Prescriptions including Prescription Drugs or Inhalants.

RECEIVED

OCT 07 2013

Signature: C/O R Pflug # 024827

LEECI MAJOR'S OFFICE

Evidence: (1) Envelope returned (2) SCDC Med Packs with Meds

10/11/13

Witness(es): INV Tisdale, LPN Dixon

Supervisor's Comments: Refer to DHO

Signature: *[Signature]* Title: *SA* Date/Time: *10/4/13*

Major/Responsible Authority: *[Signature]*

903

Signature: *A. Pugh* Title: *Capt.* Date: *10-7-13*

STG Related - Refer to STG Committee
 Yes No Unknown

This Incident is DRUG related
 Yes Unknown

APR 07 2015
 Action Taken
 Informal Resolution
 Administrative Resolution
 Refer to Disciplinary Hearing

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM

STEP 1

INMATE NAME: Timothy Green
 SCDC NUMBER: 113830
 INSTITUTION: LEE CORR INST.
 HOUSING UNIT: KEESHAW N. RM # 1254
 WORK ASSIGNMENT: DORM

Grievance No. 10-12-13
 Code: General Policy
 Disc. Hear. _____
 Class. _____
 PREA _____
 Date Received 2/3/14
 IGC Initials HT

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)

I wrote on the 4th of Oct. 2013 my legal mail to my attorney was by INV. Tisdale, C.O. Plemons and authorized by Lt. DURAN Capt. A. Pinkney and Div. of OPERATIONS DENNIS R. Patterson Inter Warden Cecilia Reynolds D.H.O Sharon Patterson. My operators which violated my attorney + client privileges. Since envelope was addressed to his attorney and his client ~~statements~~ was on it, this should've been notified as well as his client and opened in the front of them, Inmate Timothy Green requested the envelope + letter + statements to be brought before them D.H.O. It seems as though it can't be found no as well as legal letters to his attorney. See incident report 13-10-045 #79 and D.H.O TAPE. See attached for rules violations const. rights 14th

ACTION REQUESTED:

statements I sent a copy of this to my lawyer, I need and letter. And that this charge be dismissed. SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:
 I wrote the warden 10-12-13 I spoke to major and warden DEAN.

Timothy Green
 Grievant Signature

DECLARATION OF FACTS truth

APR 07 2015

By Timothy COREEN # 113830

SC Court of Appeals

To The Honorable JENNY ABBOTT KITCHINGS, Clerk

MADAM, I AM WRITING TO YOU TO GIVE YOU AN UNDERSTANDING OF WHAT'S GOING ON. FIRST AND FOREMOST I AM SO GLAD THAT I AM NOT AT LEE COUNTY CORR. INST. ANYMORE. THE STAFF AT THAT INSTITUTION IS EVIL... I GOT SHIPPED TO LEE CORR. INST. FROM EVANS. IN 2007 I WAS IN THE DARLINGTON UNIT FOR ABOUT 3 WEEKS MAYBE MORE. THE GUYS IN CHESTERFIELD AND LOCKUP HEARD THAT I WAS ON THE YARD. I STARTED GETTING LETTERS FROM GUYS SAYING THAT THE OFFICERS WAS GASING THEM AND BEATING THEM UP WHILE THEY WERE IN HANDCUFFS. SOME OF THE GUYS THEY WERE BEATING FROM THE LETTERS I WAS RECEIVING WAS GUYS THAT WAS UNDER MENTAL HEALTH. AND I KNEW THEY

LEGAL MAIL

were sick. ~~So~~ I got a letter from some other guys as well saying Lt. Franklin Richardson Jr., Lt. TUNE, Lt. DAVIS so I started writing senator Ralph Anderson telling him what was going on. I was coming from the kitchen for lunch. Two officers came up to me and told me to mind my business old school before you get hurt. I took it as a joke i didn't know that senator Ralph Anderson was sending a copy of my letter to JON DEMINT. And he was sending the report to the warden Anthony Padula. And he was telling the officers what was going on. See incident report records this how they started playing me. I was seeing Major BRACEY of the Red Team for taking my legal box with information I had received that would have exonerated me statements and transcripts motions everything I could respond to my appeal. This happened at ERANS CORR INST. 2004 brief history I filed about my T.V. and how they wouldn't send out my 1983 civil case against I met this woman that came to visit me at ERANS.

LEGAL MAIL

Through a friend. She was using fake Id. I didn't know she was doing that. They found out while I was visit with her and locked me up. I didn't know anything until she wrote me and told me what she had did. I forgave her and move on they shipped me not because the girl but because the 1983 civil case I file against them about my T.V. and my legal box. And how the mailroom never sent my 1983 forms in. Look at how dirty these people are Major Tracey wife work in the mailroom at Lee County Corr. Inst... They know how to play the game of keeping you out of the court room. I wrote the courts and they told me they never received my 1983 forms. The mailroom at Evans never sent my forms off. They also never filed my guidance to the ALSD. either. I found that out when I hire Robert Butcher I am moving to far ahead let me go back. I was writing Senator Ralph Anderson every thing they were doing.

LEGAL MAIL

I NEVER got my LEGAL BOX BACK WARDEN WILLIS - EGGLETON
deputy warden CHARIS JAMES GRAMHAM STEVEN NOLAN see
CIVIL ACTION CASE NO: 9:09-CV-03270-DCN-BM My LAWYER
Robert Butcher tricked me to let the case go. the warden
MAKE them pay ON the case with Lt. Frank W Richardson
Sr. and defendants. Back to where were giving you a
short summary. The Mailroom lady SANCHIA SIMON BEACEY
wouldn't let me mail my suit out. BECAUSE Major Beacey
is her husband. I'm filing grievance ON the Mail-
Room. Now check this ~~out~~ I'm the head dorm
keeper they set me up with a phone charger.
Now I go to chesterfield these guys been eat
rotten eggs & rotten cold cuts for 3 years. Oh my
GOD. The water was cold in the showers and
it was like that during the winter as well.
The bread was frozen hard. Guy hadn't used the
bathroom in 4+5 days. stopped up. Lockdown
23 hour & 55 minutes & minute in the showers.
They were beating guys.

LEGAL MAIL

And gassing them and not giving them showers, they told
to stop with the letter & the PAPERWORK AS I told them
I wasn't the found me guilty for a phone charge and
locked me up. I was trying mail my civil action and
my APPEAL PAPERS REQUESTING TRANSCRIPTS and my briefs.
She would mail it out. Lt. FRANKLIN RICHARDSON JR. came
to my room and asked me for my PAPERWORK and
HE GAVE ME HIS word that he would mail it out.

Almost a month went passed I asked him he told
me they mailed it out. A WEEK LATER mail came
that wasn't and they put my civil action and appeal
to the supreme court in the clapped. I filed

GRIEVANCES ~~against~~ AND DAVIS Lt. FRANKLIN RICHARDSON JR.
WARDEN PADULA ASS. WARDEN BELL CATHERINE JAMES GRIEVANCE ~~cases~~

- LESIA JOHNSON GRIEVANCES. Lt. FRANKLIN RICHARDSON JR.

came to my room and told me that I better stop
all PAPERWORK on him or he was going to get
me. I wrote the both warden PADULA & BELL and
told them to ship me. that life was in danger

LEGAL MAIL

THE SENT ME TO THE YARD CHESTERFIELD. THEY STATED PUTTING
ALL KINDS OF CHARGES ON ME. I WROTE SENATOR RALPH ANDERSON
LETTING KNOW WHAT WAS GOING. THEN THEY PUT LT.
FRANKLIN RICHARDSON JR. OVER CHESTERFIELD UNIT. HE
GASING AND JUMPING ON GUYS DAILY. EVERYONE
WAS TIRED OF HIM I "NO" DON'T TOUCH NEVER USE
VIOLENCE. I SAID LETS GO ON A HUNGERSTRIKE.

WE WENT ON A HUNGERSTRIKE. A LOT OF GUYS COULDN'T
HANG. BUT THEY WERE THREATENING ME BECAUSE MY
FRIENDS AND FAMILY WAS CALL HEADQUARTERS AND
THE INSTITUTION DAILY. LT FRANKLIN RICHARDSON JR.
CAME BY MY ROOM THREATENING ME. I WENT
19 DAYS WITH NO FOOD OR WATER. THEY STARTED
GIVING THE GUYS A HOT MEAL. I HAD TO GO TO
THE HOSPITAL FOR MY STOMACH THAT ROTTEN MEAT
AND ROTTEN EGGS AND HARD FROZEN BREAD HAD
GAVE ME GASTRO ULCERS AND SOME OTHER
TYPE OF ULCERS I BLEEDING IN ALWAYS
IN PAIN. WHEN I USE

BATHROOM THE TOILET IS OF BLOOD. 5/1

LEGAL MAIL

SALUDA UNIT

When I got back from hospital Lt. Franklin Richardson
was telling me that he was going to get rid of
me. I told him to ship me. I'm reading the
he got something for me ASS. We wrote the
Justice dept. Fort Worth Colass Civil liberties union.
Nobody would help us. I wrote SENATOR HUBERT
GRAHAM. No help. They did everything NO ONE
would help us. The next day they bought lunch
in about 10:00 clock that morning EVERYONE WAS
ASK Lt. Richardson to PASS OUT the food. He told
the unit came back playing games laughing.
Now its after 2:00 o'clock guys started kicking
and banging on the doors he come running
on the wing. Guys asking him to pass the
food coming him. As soon as I asked
to pass out the food he said what you
said and started running up towards my
Room. I got the paper.

He gave me an order to take the flap down.
I had my face wrapped up in a towel. I
knew he wanted to spray the gas in me
shot the door. But I was prepared, he told
to pack my shit I was going to lockup.
I asked what did I do? Guys told me
man they are going to beat you bro. I said
what. They said that's there move to get you
on lockup and beat you up, when we were
going to lockup. I stop by the contraband
office and told the investigator what
the guys said. He told me he heard about
Lt Franklin Richardson Jr and wrote him
if anything happens. The guys that work
in operations will go into your bag
and steal your radio anything of value.
They took it when I got to lockup. I'm
in handcuffs.

They put me into the holding cell. Lt. Richardson etc. Cain and Sgt. Price. I asked him what I was being locked up for? he wouldn't say anything. But I said you nothing, you think you're better than me. You nothing, but ex-stripper he went and got the gas while I was talking to him he spray the gas down my throat.

Lots of it went down my throat. They sent for the nurse. I couldn't breathe and that gas went down my throat into my stomach.

I'm trying to recuperate. The put me into handcuffs and took me over to the nurses station. I threw up the gas that went down my throat. That's when Lt. Franklin Richardson Jr grabbed me and pick me up and slammed me to the floor and started slamming my head into the floor and punching me in my face. And jumped down in my side with his knee.

only thing I could do was lay there. Ofc. Farmer
Picked me up and ofc. Finley was there and
Sgt. Rice Lt. Ms. Jenkins ofc. can all can tell you
I wasn't banging my head on the walls.
The X-rays will show injuries was to my
right nose area and back side of my head was
slammed on the floor officer Farmer pick me
up and took me to take a shower nurse
Cooter told them to bring down to the nurse
station the infirmary or medical on the
yard but they never took me. officer
Thompson took care of me with ice and
milk for my stomach. I was in pain for some
time. My knees and ribs and headaches
along with my stomach. They were trying
hide me on lockup. until about 7 days later
Contractual Bell seen my face and my eye
and made them send me to medical.
I know I had a very bad concussion.

I had blisters all over my tongue and I didn't know they were on my throat until weeks later. I was complaining about my throat for weeks.

Nurse Franklin and Nurse ~~Moody~~ ~~seen~~ them and filed the paperwork to see the nurse practitioner Rabon. They got everybody hiding from the Federal Marshall Service the summons.

Please could you get the judge to order a lie detector test for Nurse Karen Cooper Franklin Richardson Jr. and Sgt. Price, O.F.C. Cain O.F.C. Farmer Nurse Franklin O.F.C. Finkley Sgt. Loydd. You'll Sgt. Price ain't going to lie on the lie detector test or O.F.C. Farmer. Lt. Richardson Franklin & Nurse Karen Cooper will fail or they will refuse. I promise you this and I'll take care as well I want them in prison.

10).

Justin
LEGAL MAIL

I AM REQUESTING AN ATTORNEY WE ARE
LOCK DOWN. I DON'T ~~KNOW~~ HOW LONG.
I CAN READ FOR LONG MY EYES GO BLURRY
EVEN WITH READING GLASSES AND I GET
BAD HEADACHES. PLEASE I AM IN DESPERATE
NEED OF HELP LEGAL HELP IT DON'T LOOK
LIKE WE ARE COMING OFF LOCKUP NO
TIME SOON. I NEED TO GET TO THE
LAW LIBRARY. BUT THE CLERKS DON'T
KNOW TO FILE THESE MOTIONS EITHER.

LEGAL MAIL

Mrs. Kitchings

It's going to be hard to get these guys to trust the Administration. Because they lied to and betrayed and tortured by it. You look at what happened in Iraq, it's happening in the United States and people in the system is covering it up. Do you remember the little young white kid that jumped off the tier, at Lee County. That kid was forced into that he went to the officers for help. They turned their back on him. I could give you at least a hundred names of people that was tortured in the Chesterfield unit and across the year the negligence of the Administration at Lee County. Just and they are the best at covering it up. The Inspector General's office is also another cover for the corruption in corrections,

LEGAL MAIL ONLY 1

They wash each others back. It's not the system.
~~its~~ the people in the system. Michael McCall people
trusted him when i was at Lee Corri Inst. He was
A standup guy. I trust him. Medical denied me
Medical Attention for about a month. I was in
in a wheel chair swelling up like a balloon. I
showed him my feet and my legs hand and
I couldn't walk. He called medical and told
the to check me out. This white nurse he was
guy. He gave me a shot and gave it to me
for about three days I became better.

How can a person hear these things and
not investigate them. Please a lot of the guys
they have shipped. You get someone to go
around the department and ask the about
Lt. Brayboy, Lt. Lease, Lt. Franklin Richardson Jr,
Lt. Dean and a few others how they hear
inmates in handcuffs.

LEGAL MAIL

They said they promoted Richardson to captain
that's crazy. They cover up things at Lee. The only
you can get them is make them take lie
detection tests all the way to the grievance
corr. officer D.H.D Sharon Patterson the case-
worker and officers. They've practice this for
A long time. The grievance corr. officer they
come up with all types of excuse to throw
guys grievances. They dealing with guys that
can barely read. Hell I can barely read I need
help. Please madam, don't hold me at the standards
of a lawyer. I get so upset sometimes my uterus
and head aches from reading and writing. I
help madam. My lawyer could afford to send
me to a doctor or do the depositions I asked
him to do. I can't read but a couple pages.
and I get headaches and my right eye
get blurred and that scares me. Please madam
get the picture from Robert.

3 Batcher

LEGAL MAIL

my attorney f.

The Common Pleas case in Lee County Bishopville,
Madam Pleas wait until I get off lock down. SO
CAN find someone to help me file my case
properly. Please Madam or get the court to
have a lawyer assigned to my case and let
him straighten things out and talk to the
people I want to talk to because Mr. Robert
Butcher never talked none of the people
I told him to talk to eye witnesses.

That will knock this case out of the
water please help me. This man really hurt
me. If I had done this to him, he would file
paperwork for a warrant ~~for my arrest~~
for my arrest, I want him
arrested and fined. He hurt me get the
pictures from attorney Robert Butcher.
Send a copy of this to the F.B.I please help me.
Sincerely
Sincerely

LEGAL MAIL

The South Carolina Court of Appeals

Timothy Green #113830

✓

Certificate of Service

Lt. Franklin Richardson Jr.

CASE NO: 2011-CP-31-0187

This is to Notify All Parties that a copy
has been served on all parties per US
Postal Prepaid.

Att. Robert Butcher

The Camden Law Firm, P.A.

P.O. Box 610

Camden S.C. 29021

The South Carolina Court
of Appeals Honorable

Jenny Abbott Kitchens

Clerk P.O. Box 11629

Columbia, South Carolina
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