

THE STATE OF SOUTH CAROLINA In the Court of Appeals.

Appeal from the Administrative Law Court, Ralph King

Anderson III, Judge Case No: ALT-22-0138-AP

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Appellate Case No. 2015-001912

OCT 16 2015

Diana Jordan, Appellant

SC Court of Appeals

South Carolina Department of Employment & Workforce, Respondent

MOTION FOR ORDER OF REFERENCE

Appellant Diana Jordan hereby moves for an ORDER OF REFERENCE to the Richland County, South Carolina, Master in Equity to determine the validity of Deeds submitted on 7/2/14 Book 1956 Page 1169 and Book 1956 Page 1175.

STATEMENT OF FACTS FOR PURPOSE OF THE MOTION

- 1) On 4/1/15 Respondent SCDew filed a Motion to Stay Appeal Proceedings Pending Criminal Prosecution based on the same facts.
- 2) On 8/20/15 Appellant Diana Jordan filed a Motion to Charge Attorney General Alan Wilson with two counts of Prosecutorial Misconduct.
- 3) The Administrative Law Court does not have the authority to issue an Order of Reference and is no longer presiding over the case.
- 4) Judge Anderson denied the Motion because he Dismissed the case and denied the Motion to Rehear by misquoting his own Court's rules.
- 5) Judge Anderson may need to issue a ruling on the Motion in the future, therefore, an Order of Reference to the Richland County, Master In Equity is necessary.

- 6) The Master In Equity has the power to rule on Motions, require the production of evidence, rule on admissibility of evidence, call witnesses and examine them under oath.
- 7) The Richland County Master In Equity has the authority to determine if the Deeds submitted to Richland County Register of Deeds, a state agency, are legitimate or forged.

DISCUSSION

The SCDEW filed a Motion to Stay Appeal Proceedings Pending Criminal Prosecution because the cases are based on the same facts therefore Your Honor is qualified to rule on the Motion.

Attorney General Alan Wilson arrested Appellant Diana Jordan on four counts of forgery and four counts of misstatements for documents submitted to SCDEW, a state agency, before the appeals process was completed.

Ashley Shaffer sent a letter to Attorney General Alan Wilson dated 11/1/15 stating on page two line three "and while the taxes reflect the selling price, it is not fraud" The Deed states the purchase price was \$88,725.00 and the taxes were \$4,365.60. If the selling price was the taxes, the Deeds are forged documents submitted to a state agency and the Attorney General did nothing.

Both of these represent gross misconduct on the part of Attorney General Alan Wilson.

CONCLUSION

After weighing the appropriate factors, this Court should conclude that Appellant Diana Jordan has demonstrated necessity and grant the Motion For Order Of Reference to the Richland County, South Carolina, Master In Equity and that all time requirements and deadlines be held in abeyance pending resolution of this Motion and its contents.

SPECIAL REQUEST

Appellant Diana Jordan is not an attorney. If any of the terminology needs to be adjusted for the Motion to be granted, I ask that you do so.

Respectfully Submitted

Diana B. Jordan

104 Woodglen Lane

Chapin, SC 29036

(803) 732-1762

Appellant

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SC Court of Appeals

October 12, 2015

Proof of Service

I certify that I have served the Respondent South Carolina Department of Employment and Workforce by depositing a copy of it in the United States Mail, postage prepaid, on October 12, 2015, addressed to

SC Dept. of Employment and Workforce

P.O. Box 8597

Columbia, SC 29202

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J

Ms Diana B Jordan
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