

THE STATE OF SOUTH CAROLINA In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT, Ralph King
Anderson III, Judge, Case Nos ALJ-22-0138-AP

Appellate Case No. 2015-001912

RECEIVED

Diana Jordan, Appellant

NOV-02-2015

v

SC Court of Appeals

South Carolina Department of Employment and Workforce (SCDEW), Respondent

MOTION FOR CRIMINAL CONSPIRACY CHARGE

Appellant Diana Jordan moves for charging Sandra Grooms (JC Bar # 640) AND the SCDEW with Criminal Conspiracy for harmful and illegal acts against Appellant Diana Jordan.

STATEMENT OF FACTS FOR PURPOSE OF THE MOTION

- 1) On 4/21/15 Respondent SCDEW filed motion to Stay Appeal Proceedings Pending Criminal Prosecution based on the same record under APPEAL.
- 2) On 10/16/15 Misconduct Motion filed by Appellant against Sandra Grooms and SCDEW for illegally seizing Diana Jordan's federal tax refund.
- 3) On 10/16/15 Misconduct Motion filed by Appellant against James A. Flowers and South Carolina Law Enforcement Division^(SLED) for arresting Diana Jordan based on a record under APPEAL.
- 4) On 10/16/15 Misconduct Motion filed by Appellant against Alan Wilson and the Office of Attorney General of South Carolina for indictment based on a record under APPEAL.
- 5) On 10/16/15 Misconduct Motion filed by Appellant against Ralph King Anderson III and the Administrative Law Court, State of South Carolina for quoting ALC Rule 39 wrong on the Final Order.
- 6) No responses disputing the allegations were received.

DISCUSSION

Sandra Grooms and the JCDEW improperly seized Appellant Diana Jordan's federal tax refund. James A. Flowers and SLED arrested Appellant based on a record under APPEAL. Alan Wilson and the South Carolina Attorney General's Office avoided Summary Court and indicted Diana Jordan based on a record under APPEAL. Ralph King Anderson III and the Administrative Law Court didn't initiate oral argument for a pro se Appellant and denied the Motion to Rehear by misquoting his own court's rules of procedure. All four individuals and their agencies engaged in Criminal Conspiracy against Appellant Diana Jordan and should be charged.

CONCLUSION

As required for a Criminal Conspiracy Charge Appellant Diana Jordan has proven that all four of the participants and their agencies initiated acts that were harmful and/or illegal. For the reasons outlined, Diana Jordan moves for the filing of Criminal Conspiracy Charges against Sandra Grooms and the JCDEW and that all time requirements and deadlines be held in abeyance pending resolution of this Motion.

SPECIAL REQUEST

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

Respectfully Submitted

October 30, 2015

Diana B. Jordan

104 Woodglen Lane

Chapin, SC 29903

(803) 732-1762

Appellant

A note from **RECEIVED**

Diana Jordan

NOV 02 2015

SC Court of Appeals
PROOF OF SERVICE

I certify that I served the
Respondent SCDEW a copy of
MOTION FOR CRIMINAL CONSPIRACY
CHARGE by US mail, postage
prepaid on 10/31/15. Mailed to:

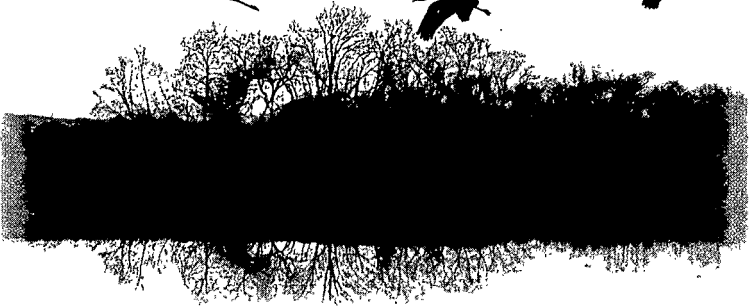
SCDEW

P.O. Box 8597

Columbia, SC 29202

Diana B. Jordan

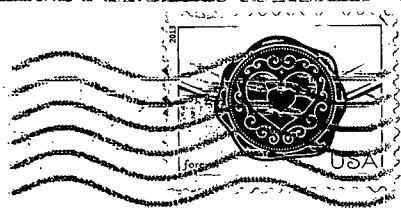
10/30/15



Ms. Diana Jordan
104 Woodglen Ln.
Chapin, SC 29036

COLUMBIA SC 290

31 OCT 2015 PM 2 L



RECEIVED

NOV 02 2015

SC Court of Appeals

South Carolina Court of Appeals

P.O. Box 11629

Columbia, SC 29211

2921131629

