1 C 0 6 1

THE STATE OF SOUTH CAROLINA

ADMINISTRATIVE LAW COURT

The Honorable Carolyn C Matthews, Administrative Law Judge

Case No 2009-ALJ-30-0103-AP

RECEIVED
MAY 0 3 2011
SC Court of Appeals

James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief,

Appellants

vs

South Carolina Department of Corrections and Palmetto Unified School District No 1,

Respondents

RECORD ON APPEAL

Volume 5 of 8

W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Lake E Summers, Esquire
Malone, Thompson, Summers & Ott LLC
339 Heyward Street, Suite 200
Columbia, South Carolina 29201

8) Governor Sanford's State of the State Address, in which he outlined a plan for educating inmates, cannot be a basis for reconsidering the RIF plan that was effective June 1, 2003 Governor Sanford's "instructions" had not been given to SCDC s Director Jon Ozmint at the time that the RIF plan at issue was developed, and
9) Governor Sanford also requested in this Address that $2 5 million dollars be given to SCDC to fund this initiative If SCDC receives this money, it will make hiring decisions in accordance with the recall rights in its RIF policy and plan

As to your first contention regarding the provisions of Article I, §22 of the State Constitution each of the individuals in the above referenced appeals was provided an opportunity to raise a material issue of fact concerning SCDC's inconsistent or improper application of its RIF policy or plan Section 8-17 330 states in part that "[a] reduction in force is an adverse employment action considered as a grievance only if the agency, or an appeal if the State Human Resources Director, determines that there is a material issue of fact that the agency inconsistently or improperly applied its reduction in force policy or plan " Section 8-17-330 also states in part "[a] covered employee has the right to appeal to the State Human Resources Director an adverse employment action involving the issues specified in this section " Based on the information provided by each of these individuals, they failed to establish that a material issue of fact existed concerning the impropriety or inconsistency of the RIF policy or plan Consequently, these individuals were given notice and opportunity to be heard concerning the threshold issue of subject matter jurisdiction which was initially before me for decision Because they did not establish that the Committee has subject matter jurisdiction, they were not entitled to any additional due process

As to your second contention, §8-17-350 states in part that "the State Human Resources Director shall determine whether or not the action is grievable to the committee or a mediator-arbitrator ' Since the issues raised were not considered to be appealable, the appeals were not forwarded to the State Employee Grievance Committee for a hearing Any cross-examination or sworn testimony would not be appropriate in determining jurisdictional requirements and would only be allowed during a hearing before the Committee

Regarding your third contention, these individuals failed to demonstrate that the information they contend SCDC refused or failed to provide is relevant to their argument that SCDC improperly or inconsistently applied its RIF policy or plan Therefore, this contention lacks merit

As to your fourth contention, the Agency Director or designee is authorized in accordance with SCDC's RIF policy "to approve any position(s) to be abolished and to approve the competitive area " Also, SCDC's RIF policy provides that "the competitive area may be ***agency wide, a*** department, or a more restricted ***geographical*** area where the staff is separately organized and clearly distinguishable from the staff in other areas [Emphasis in original] ' In addition, SCDC's RIF policy defines competitive area as "a common geographical or organizational area in which employees will be considered for reduction-in-force procedures including transfers, reassignments, and/or bumping which is determined and approved by the Agency Director " The Agency Director or his designee, therefore, has the discretion of developing the RIF plan and defining the competitive area In addition, SCDC's RIF policy allows for the competitive area to be defined as a specific geographical area Section 24-25-90 of the S C Code of Laws states The superintendent of the district and all other educational personnel shall be employed, supervised, and terminated according to the South Carolina Department of Corrections' personnel policies and procedures ' In accordance with SCDC s RIF policy, the competitive areas were defined in specific geographical areas

around the state and included both educator and non-educator positions Any competition for positions would occur within the competitive area since SCDC's RIF policy does not provide for competition outside of the competitive area Nothing in the cited statute nor SCDC's RIF policy requires that these educators be treated in a "unified" fashion

In your fifth contention, you argue that neither SCDC nor my January 9, 2004 letter offer any justification for the elimination of educational programs to inmates The reason provided by SCDC in its June 2003 RIF plan, and stated in my January 9, 2004 letter, indicates the need to eliminate both educational and non-educational positions because of budgetary reasons In addition, in your fifth contention you cite Governor Sanford's State of the State Address in which he mentions the educational programs of SCDC inmates The Governor's State of the State Address occurred twelve days after my January 9, 2004 letter and approximately eight months after the effective date of the RIF You have failed to demonstrate a nexus between the State of the State Address and the improper or inconsistent application of SCDC's RIF policy or plan

As to your sixth contention, you have also failed to demonstrate a nexus between any comments made by SCDC's Director and the improper or inconsistent application of SCDC's RIF policy or plan

Concerning your seventh contention, while §24-25-70 of the Code of Laws authorizes the school board, with the consent and concurrence of the Director of the Department of Corrections,' to perform administrative functions for the Palmetto Unified School District, this statute must also be read together with §24-25-90 In reading both of these sections together, employees of the Palmetto Unified School District are also subject to SCDC's personnel policies and procedures, specifically with regard to termination As provided in SCDC s RIF policy, the Agency Director has the ability to determine when and how to eliminate positions

In our sole determination of whether or not subject matter jurisdiction exists for these appeals, the allegations you have presented do not raise a material issue of fact concerning the improper or inconsistent application of SCDC's RIF policy or plan While the information contained in your letter of February 2, 2004, has been reviewed, I uphold my final decision of January 9, 2004, on the above referenced appeals

Sincerely,

Samuel L. Wilkens

Samuel L Wilkins
Director

c Mr Jon Ozmint
Ms Deborah Drucker Deutschmann

Is your RETURN ADDRESS completed on the reverse side?

SENDER
- Complete items 1 and/or 2 for additional services
- Complete items 3 4a and 4b
- Print your name and address on the reverse of this form so that we can return this card to you
- Attach this form to the front of the mailpiece or on the back if space does not permit
- Write *Return Receipt Requested* on the mailpiece below the article number
- The Return Receipt will show to whom the article was delivered and the date delivered Re SCDC Reconsideration

I also wish to receive the following services (for an extra fee)
1 ☐ Addressee s Address
2 ☐ Restricted Delivery
Consult postmaster for fee

3 Article Addressed to

MR W ALLEN NICKLES
ATTORNEY AT LAW
PO BOX 1866
COLUMBIA, SC 29202-1866

4a Article Number 7099 3400 0011 4892 3220

4b Service Type
☐ Registered ☑ Certified
☐ Express Mail ☐ Insured
☐ Return Receipt for Merchandise ☐ COD

7 Date of Delivery MAR 2 4 2004

5 Received By (Print Name)

8 Addressee s Address (Only if requested and fee is paid)

6 Signature (Addressee or Agent)
X

PS Form **3811**, December 1994 102595-98 B-0229 Domestic Return Receipt

Thank you for using Return Receipt Service

7099 3400 0011 4892 3220

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:
Re SCDC Reconsideration

PO BOX 1866
COLUMBIA, SC
29202-
1866

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Name (Please Print Clearly) (to be completed by mailer)

Street Apt No or PO Box No

City State ZIP+4

PS Form 3800, July 1999 See Reverse for Instructions

GERGEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
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Richard Mark Gergel
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David E. Rothstein
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1519 Richland Street
Telephone (803) 779-8080
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office@gnslaw.com

April 6, 2004

Via Hand Delivery
The Hon. Barbara A. Scott
Richland County Clerk of Court
P. O. Box 192
Columbia, South Carolina 29202

RE James "Call" Bell, et al. v. SC Department of Corrections and Palmetto Unified School District No. 1

Dear Ms. Scott:

Enclosed please find the original and copies of Plaintiffs' Summons, Petition for Judicial Review and Complaint in the above-referenced matter. Please file the original and return the extra, clocked-in copies, with the bearer. A check in the amount of $100.00 is also enclosed for your filing fee. Thank you for your assistance in this matter.

Sincerely,

W. Allen Nickles, III

WAN/pfb
Enclosures
cc: Hon. Henry McMaster, Attorney General (via Certified Mail)
Sam Wilkins, Esquire, Director, State Office of Human Resources (via Certified Mail)
File #03-156

RECEIVED
APR 7 2004
OFFICE OF HUMAN RESOURCES

2001

STATE OF SOUTH CAROLINA)
COUNTY OF Richland)

In re: "Carl" Bell, et al Plaintiff(s)

vs

SC Department of Corrections & Palmetto Unified School Dist #1 Defendant(s)

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

4 - CP - 40 - ____

(Please Print)
Submitted By W. Allen Nicholls, III
Address Post Office Box 11486
Columbia SC 29211

SC Bar # 4226
Telephone # 803 779 5800
Fax # 803 254 1335
Other
E-mail WANicholls@gnsl.com

NOTE The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law This form is required for the use of the Clerk of Court for the purpose of docketing It must be filled out completely signed and dated A copy of this cover sheet must be served on the defendant(s) along with the Summons and Complaint

DOCKETING INFORMATION *(Check one box below)*

- ☐ **JURY TRIAL** demanded in complaint
- ☐ This case is subject to **ARBITRATION** pursuant to the Circuit Court Alternative Dispute Resolution Rules
- ☐ This case is subject to **MEDIATION** pursuant to the Circuit Court Alternative Dispute Resolution Rules
- ☒ This case is exempt from ADR (certificate attached)

NATURE OF ACTION
(Check One Box Below)

Contracts
- ☐ Construction (100)
- ☐ Debt Collection (110)
- ☐ Employment (120)
- ☐ General (130)
- ☐ Wrongful Breach (140)
- ☐ Other (199)

Torts Professional Malpractice
- ☐ Dental Malpractice (200)
- ☐ Legal Malpractice (210)
- ☐ Medical Malpractice (220)
- ☐ Other Malpractice (299)

Torts – Personal Injury
- ☐ Assault/Slander/Libel (300)
- ☐ Conversion (310)
- ☐ Motor Vehicle Accident (320)
- ☐ Premises Liability (330)
- ☐ Products Liability (340)
- ☐ Other (399)

Real Property
- ☐ Claim & Delivery (400)
- ☐ Condemnation (410)
- ☐ Foreclosure (420)
- ☐ Mechanic s Lien (430)
- ☐ Partition (440)
- ☐ Possession (450)
- ☐ Other (499)

Inmate Petitions
- ☐ PCR (500)
- ☐ Sexual Predator (510)
- ☐ Mandamus (520)
- ☐ Habeas Corpus (530)
- ☐ Other (599)

Judgments/Settlements
- ☐ Death Settlement (700)
- ☐ Foreign Judgment (710)
- ☐ Magistrate s Judgment (720)
- ☐ Minor Settlement (730)
- ☐ Transcript Judgment (740)
- ☐ Lis Pendens (750)**
- ☐ Other (799)

Administrative Law/Relief
- ☐ Driver License Reinstate (800)
- ☐ Judicial Review (810)
- ☐ Relief (820)
- ☐ Permanent Injunction (830)
- ☐ Forfeiture (840)
- ☐ Other (899)

Appeals
- ☐ Arbitration (900)
- ☐ Magistrate Civil (910)
- ☐ Magistrate Criminal (920)
- ☐ Municipal (930)
- ☐ Probate Court (940)
- ☐ SCDOT (950)
- ☐ Worker s Comp (960)
- ☐ Zoning Board (970)
- ☑ Other (990) Richland County Board Adj

Special/Complex /Other
- ☐ Environmental (600)
- ☐ Automobile Arb (610)
- ☐ Medical (620)
- ☐ Other (699)

** Check only if Summons & Complaint to follow in 20 days

Submitting Party Signature _____ **Date** 4/6/04

Note Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP Rule 11 and the South Carolina Frivolous Civil Proceedings Sanctions Act S C Code Ann §15 36-10 et seq

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
	C/A NO 04-CP-40-_____
James "Cal" Bell, Othella Bernard, Katherina Bower, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief,	
Plaintiffs,	
vs	CERTIFICATE OF EXEMPTION FROM ADR
South Carolina Department of Corrections and Palmetto Unified School District No 1,	
Defendants	

I certify that this action is exempt from ADR because

XX this action is appellate in nature

GERGEL, NICKLES & SOLOMON, P A

By W Allen Nickles III
By Carl Solomon

W Allen Nickles, III
Dona L Guffey
1519 Richland Street
Post Office Box 1866
Columbia, South Carolina 29202-1866
(803) 779-8080

Attorneys for Plaintiffs

12/16, 2004
Columbia, South Carolina

2003

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT C/A NO 04-CP-40-_____
James "Cal" Bell, Othella Bernard, Katherina Bower, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief, Plaintiffs, vs South Carolina Department of Corrections and Palmetto Unified School District No 1, Defendants	SUMMONS

TO THE DEFENDANTS ABOVE NAMED

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint upon subscribers at their offices at 1519 Richland Street, Post Office Box 1866, Columbia, South Carolina 29202-1866, within thirty (30) days after service hereof, exclusive of the day of such service If you fail to answer the Complaint within the time aforesaid, the Plaintiff will apply to the Court for the relief demanded in the Complaint

NOTICE **If you fail to appear and defend, judgment by default will be rendered against you for the relief demanded in the Complaint**

SIGNATURE PAGE FOLLOWS

2004

GERGEL, NICKLES & SOLOMON, P A

By _____

W Allen Nickles, III
Dona L Guffey
1519 Richland Street
Post Office Box 1866
Columbia, South Carolina 29202-1866
(803) 779-8080

Attorneys for Plaintiffs

_____, 2004
Columbia, South Carolina

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT C/A NO 04-CP-40-_____
James "Cal" Bell, Othella Bernard, Katherina Bower, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief, Plaintiffs, vs South Carolina Department of Corrections and Palmetto Unified School District No 1, Defendants	PETITION FOR JUDICIAL REVIEW AND COMPLAINT

Plaintiffs, complaining of the Defendant, show unto the Court as follows

PARTIES

1 Plaintiffs are educators employed by the Defendants

2 The Defendant, South Carolina Department of Corrections (SCDOC) is an agency of the State of South Carolina and is subject to suit in its own name

3 The Defendant, Palmetto Unified School District No 1 (District) is a special state wide unified school district within the SCDOC pursuant to S C Code Ann § 24-25-10 et seq

4 The District is under the control and management of a Board of Trustees which is responsible for operation of the District under the supervision of the SCDOC S C Code Ann § 24-25-40

5 With the "consent and concurrence" of the Director of the SCDOC, the District's Board has the statutory mandate to "operate as executory agent for the schools under its jurisdiction" and to perform designated administrative functions including the establishment of academic programs, determining physical facilities needed to carry out all education programs and presenting an annual educational budget to the SCDOC for submission to the General Assembly S C Code Ann § 24-25-70

PROCEDURAL BACKGROUND

6 On or about April 4, 2003, Plaintiffs received notice of separation from employment due to reduction in force effective June 1, 2003

7 On or about June 12, 2003, Plaintiffs timely filed grievance actions challenging their separation from employment due to reduction in force

8 On or about June 16, 2003, SCDOC issued a decision denying Plaintiffs' grievances

9 On or about June 20, 2003, Plaintiffs timely filed grievance appeals to the Office of Human Resources of the South Carolina Budget and Control Board

10 On or about January 9, 2004, the Director of the Office of Human Resources issued a letter denying Plaintiffs' appeals

11 On or about February 2, 2004, Plaintiffs timely served a request for reconsideration of the January 9, 2004 determination by the Office of Human Resources

12 On or about March 22, 2004, the Director of the Office of Human Resources issued a letter denying Plaintiffs' request for reconsideration

13 This petition for judicial review and complaint is submitted within thirty (30) days of receiving the final determination from the Office of Human Resources pursuant to South Carolina Code Ann § 8-17-350

JURISDICTION

14 Plaintiffs have exhausted all administrative remedies available within the SCDOC and under the State Employee Grievance Procedure Act S C Code Ann § 8-17-310 et seq

15 Plaintiffs are entitled by law and constitution to judicial review of an administrative decision adversely affecting their continuing employment See, S C Constitution, Article I, §§ 3, 22, S C Code Ann §§ 8-17-340, 350

16 The denial of Plaintiffs' appeal by the Office of Human Resources was taken without affording Plaintiffs the opportunity to present sworn testimony or to cross-examine those parties responsible for terminating their employment

17 Upon information and belief, the action taken by the Office of Human Resources in this matter is in violation of constitutional or statutory provisions, affected by error of law, clearly erroneous in view of reliable, probative and substantial evidence on the record available for review and constitutes an abuse of discretion See, S C Code Ann § 1-23-380(A)(6)

18 Throughout the administrative grievance process, SCDOC refused or failed to provide Plaintiffs access to information relevant to their claims that the SCDOC violated law in implementing the reduction in force which resulted in their separation from employment Accordingly, Plaintiffs hereby apply to the Court for leave to present additional evidence for consideration in this matter See, S C Code Ann § 1-23-380(A)(3) This additional evidence is necessary to enable the reviewing court to determine whether the determination of the Office of Human Resources is factually and legally supportable

ISSUES FOR REVIEW

19 It is respectfully submitted that upon review of an adequate record, the evidence in this case will show

a The Defendants violated law in failing to involve the District's Board in the decision to eliminate educational programs at certain of its correctional facilities,

b The Defendants violated law in failing to treat the educators employed in the District in a ' unified" fashion Instead, Defendants unlawfully and arbitrarily divided the legislatively established "special statewide unified school district ' into geographic regions which resulted in the inability of educators to compete for positions based upon their service and qualifications

c The Defendants retaliated against the Plaintiffs for filing suit in order to enforce their rights to appropriate compensation under law Upon information and belief, the evidence will show that a disproportionate number of educators employed in the District were separated from employment as a result of reduction in force

d The Defendants acted in an arbitrary and capricious fashion in eliminating and severely restricting the availability of educational programs to inmates in a manner which is contrary to public policy

e The Defendants acted in an arbitrary and capricious fashion in assigning education related responsibilities to individuals without proper certification and qualifications to provide such services

RELIEF REQUESTED

20 For the reasons set forth above, Plaintiffs respectfully request the following relief

a An order declaring Plaintiffs' right to a hearing before the State Employee Grievance Committee regarding their separation from employment due to

reduction in force,

b An order declaring the Defendants' reduction in force to be in violation of South Carolina Code Ann § 24-25-10, et seq in the following particulars

1 Failing to observe the statewide unified nature of the Palmetto Unified School District by dividing the District into geographic areas for purposes of reduction in force,

2 Failing to involve the District's Board of Trustees in implementation of the reduction in force,

3 Failing to afford Plaintiffs statewide "bumping rights" for retention of employment in the reduction in force,

4 Failing to establish proper service and performance credits for determining retention of employment in the reduction in force,

5 Assigning education related responsibilities to individuals without proper certification and qualifications to provide such services

c An order reinstating the Plaintiffs to employment, with full back pay and benefits, pending the institution of a legally valid reduction in force, if necessary,

d An order permitting the Plaintiffs to present additional evidence for consideration in this matter,

e An award of attorney fees and costs,

f Such other and further relief as the Court may deem just and proper

*****SIGNATURE PAGE FOLLOWS*****

GERGEL, NICKLES & SOLOMON, P A

By _____

W Allen Nickles, III
Dona L Guffey
1519 Richland Street
Post Office Box 1866
Columbia, South Carolina 29202-1866
(803) 779-8080

Attorneys for Plaintiffs

_____, 2004
Columbia, South Carolina

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ATTORNEYS AT LAW
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Columbia South Carolina 29202 1866

Richard Mark Gergel
W Allen Nickles III
Carl L Solomon
Dona L Guffey
Dwayne T Mazyck

1519 Richland Street
Telephone (803) 779 8080
Facsimile (803) 256 1816
www gnslaw com



January 19, 2007

Samuel L Wilkins, Esquire
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE Bell, et al v South Carolina Department of Corrections
CA# 04-CP-40-1761

Dear Sam

Enclosed is the judgment and order issued in the above case on January 10, 2007 This order directs the Office of Human Resources to reinstate the grievance of the Plaintiffs for a hearing before the State Employee Grievance Committee I would appreciate an opportunity to speak with you concerning the scheduling of this hearing

By copy of this letter I am informing Lake Summers, attorney for the Department of Corrections, of this communication

Sincerely,

W Allen Nickles, III

WAN/pgm
File # 03-156
cc Lake Summers (w/o Enclosure)

Enclosure

03 156 wilkins 011907 wpd

FORM 4

-560-

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND
IN THE COURT OF COMMON PLEAS

James C. Bell et al.

PLAINTIFF(S)

JUDGMENT IN A CIVIL CASE

CASE NO 04-CP-40-1761

SC Dept of Corr et al.

DEFENDANT(S)

2007 JAN 10 AM 11 16

CHECK ONE

[ ] **JURY VERDICT** This action came before the court for a trial by jury The issues have been tried and a verdict rendered

[ ] **DECISION BY THE COURT** This action came to trial or hearing before the court The issues have been tried or heard and a decision rendered

[ ] **ACTION DISMISSED** (CHECK REASON) [ ] Rule 12(b) SCRCP [ ] Rule 41(a), SCRCP (Vol Nonsuit) [ ] Rule 43(k) SCRCP (Settled) [ ] Other _____

[ ] **ACTION STRICKEN** (CHECK REASON) [ ] Rule 40(j) SCRCP, [ ] Bankruptcy, [ ] Binding arbitration subject to right to restore to confirm vacate or modify arbitration award [ ] Other _____

IT IS ORDERED AND ADJUDGED [✓] See attached order [ ] Statement of Judgment by the Court

Dated at Cola South Carolina this 10th day of Jan, 2007

PRESIDING JUDGE

This judgment was entered on the ___ day of _____ 20___ and a copy mailed first class this 10 day of Jan 2007 to attorneys of record or to parties (when appearing pro se) as follows

W Nickles
D. Guffey

ATTORNEY(S) FOR THE PLAINTIFF(S)

S Justice
L. Simmons

ATTORNEY(S) FOR THE DEFENDANT(S)

2013

CLERK OF COURT

SCRCP APP-24

SCRCP FORM 4 (Revised /00)

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
	C/A NO 04-CP-40-1761
James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief,)	
Plaintiffs,)	ORDER
vs)	
South Carolina Department of Corrections and Palmetto Unified School District No 1,)	
Defendants)	

PROCEDURAL HISTORY

Plaintiffs are certified educators formerly employed in full-time instructional or administrative positions in the Palmetto Unified School District ("District") This school district was created by statute to serve inmates in the South Carolina Department of Corrections ("SCDC" or "Department") S C Code § 24-25-10, et seq Plaintiffs were each removed from their positions as the result of a reduction in force implemented effective June 1, 2003 Plaintiffs exhausted all administrative remedies afforded to them and seek judicial review for reinstatement to their former positions of employment

Plaintiffs filed a Petition for Judicial Review and Complaint on April 6, 2004 By this Petition, Plaintiffs seek an order remanding their grievance appeals to the Office of Human

Resources ("OHR") to be heard by the South Carolina State Employees Grievance Committee pursuant to S C Code Annotated § 1-23-380(A)(6) Plaintiffs filed a Motion for Discovery on November 19, 2004 In an Order dated May 2, 2005, this Court granted Plaintiffs' motion as to all requested interrogatory responses, requests for production of documents, and depositions Defendant's Motion for Reconsideration was denied on September 8, 2005

LEGAL ANALYSIS

An employee has a right of appeal from the final decision of an agency employee grievance procedure to the State Human Resources Director S C Code Ann § 8-17-330 Under this section (titled Agency employee grievance plans, procedures, appeals), an employee may file a grievance or an appeal concerning an adverse employment action, such as termination This section states that "a reduction in force is an adverse employment action considered as a grievance only if the agency, or as an appeal only if the State Human Resources Director, determines that there is a material issue of fact that the agency inconsistently or improperly applied its reduction in force policy or plan " Id The State Human Resources Director then forwards only those employee appeals regarding reductions in force to the State Employee Grievance Committee which have been determined to (1) have a material issue of fact regarding inconsistent or improper application of the agency's reduction in force plan or policy, and (2) meet the jurisdictional requirements S C Code Ann § 8-17-340

In this case, the Plaintiffs never received a hearing before the Grievance Committee because the State Human Resources Director determined their complaint was not grievable This is a final decision from which Plaintiffs can appeal Demian v South Carolina Health and Human Services Finance Com'n, 297 S C 1, 374 S E 2d 510 (Ct App 1988) An appeal to the

circuit court from a final decision of the State Human Resources Director determining that an appeal is not grievable is governed by the Administrative Procedures Act, under S C Code Ann § 1-23-310 through 400, Code of Laws of South Carolina, 1976, as amended Id

Under the Administrative Procedures Act, a party who has exhausted all administration remedies within the agency and who is aggrieved by a final decision in a contested case is entitled to judicial review under this article S C Code Ann § 1-23-380 The court may affirm the decision of the agency or remand the case for further proceedings S C Code Ann § 1-23-380(A)(6) The ultimate question faced by the Court is, whether are not, there is a material issue of fact that the Department of Corrections inconsistently or improperly applied its reduction in force policy or plan

This Court finds there is sufficient evidence that a material issue of fact exists in the Department of Corrections implementation of its June 1, 2003 reduction in force plan Specifically, the Plaintiffs have raised several concerns that present material issues of fact, such as

1 the South Carolina Department of Correction's division of unified school district,

2 the lack of participation by the School District and its Board of Trustees in the process,

3 the fact that of the 148 positions eliminated in the reduction in force, 84 were from the Division of Education,

4 the assertion that Plaintiffs' selection for reduction in force was in retaliation for enforcing their right to be paid in compliance with state law under a separate law suit, and

5 the fact that the Department of Corrections retained probationary employees, grant employees and "pink slip" temporary employees in favor of educators, which is in contrary to the Department's procedure used in the 2001 reduction in force, where at-will employees were eliminated and those positions where filled by permanent employees

CONCLUSION

For the reasons stated above, there exist disputed issues of material fact which entitle Plaintiffs to a hearing before the State Employee Grievance Committee Therefore, Plaintiffs' request for remand is GRANTED, and the Office of Human Resources is directed to reinstate the grievance for a hearing before the State Employee Grievance Committee

AND IT IS SO ORDERED

G Thomas Cooper, Jr.
Judge, Fifth Judicial Circuit

Columbia, South Carolina
January 8, 2007

From "Lake Summers' <summers@mandtlawfirm com>
To 'Barton Vincent'" <Vincent Barton@doc state sc us> "David Tatarsky <Tatarsky David@doc state sc us> John Near" <Near John@doc state sc us>
Date 2/18/2007 2 59 24 PM
Subject Copy of Acknowledgement from Court of Appeals for Notice of Appeal in Bell et al v SCDC and PUSD No 1

All –

I ve attached a PDF copy of the acknowledgement I received from the Court of Appeals concerning my Notice of Appeal in Bell

Obviously I will file and serve the Amended Notice of Appeal as directed by the Clerk of Court Also I ve already requested the hearing transcript from the court reporter and the court reporter recently sent me written confirmation of my request

I ll keep everyone posted as events warrant

Take care

Lake

Lake Summers

PLEASE NOTE OUR NEW NAME AND ADDRESS

Malone Thompson Summers & Ott LLC

339 Heyward Street Suite 200

Columbia SC 29201

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E-mail HYPERLINK "mailto summers@mtsolawfirm com"summers@mtsolawfirm com

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CC <aflynn@ogc sc gov> <tbaggott@ohr sc gov>, <dclark@ohr sc gov>

The South Carolina Court of Appeals

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CLERK

V CLAIRE ALLEN
DEPUTY CLERK

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1015 SUMTER STREET
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WWW SCCOURTS ORG

February 15 2007

Lake Eric Summers Esquire
Malone Thompson Summers & OH LLC
339 Heyward St
Columbia SC 29201

Re Bell James "Cal" v SCDC

Dear Mr Summers

We have received your Notice of Appeal in the case noted above This case will be docketed in the Court of Appeals and all communications concerning this case, including motions and petitions, initial and final briefs, and the Record on Appeal, should be directed to and filed in this Court For all filings, please note the requirements of Rule 238(a) of the South Carolina Appellate Court Rules, and be further advised that Court of Appeals policy requires the firm name of any counsel shown must be included in his or her address

We suggest that large parcels such as copies of final briefs and the Record On Appeal be sent directly to the Court via the street address 1015 Sumter Street Columbia, S C 29201 Thank you for your attention to this Failure to file in the proper court may result in the dismissal of your appeal

According to the caption featured on the order you are challenging on appeal, the caption in this appeal should read exactly as follows

James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief, **Respondents,**

v

South Carolina Department of Corrections and Palmetto Unified School District No 1, **Defendants,**

of whom South Carolina Department of Corrections is the **Appellant**

All future filings by any party must feature the above caption

Please be advised, it will be necessary for you to serve and file an Amended Notice of Appeal with the correct caption within ten (10) days of the date of this letter

PLEASE BE ADVISED that, pursuant to Rule 207 of the South Carolina Appellate Court Rules, the transcript must be ordered within ten (10) days of the proof of service of the Notice of Appeal and you *must* provide this Court, opposing counsel and the Office of Court Administration with all correspondence regarding the transcript It is also Appellant's responsibility to make satisfactory arrangements (including agreement regarding payment for the transcript) with the Court Reporter for furnishing the transcript You are reminded of the notification requirements of Rule 207(e), SCACR, also, please advise the Court in writing upon receipt of the transcript

NOTE If you believe this case has been improperly filed in the Court of Appeals, by reason of the limitations set forth in S C Code Ann Section 14-8-200(b)(1998), as amended June 1, 1999, notify the Clerk's office of the Court of Appeals immediately The cited Code Section prohibits the Court of Appeals from hearing appeals in seven classes of cases

1) any final judgment from the circuit court which includes a sentence of death

2) any final judgment from the circuit court setting public utility rates pursuant to Title 58

3) any final judgment involving a challenge on state or federal grounds to the constitutionality of a state law or county or municipal ordinance where the principal issue is the constitutionality of the law or ordinance

4) any final judgment from the circuit court involving the authorization issuance or proposed issuance of general obligation debt, revenue, institutional, industrial or hospital bonds of the state its agencies, political subdivisions, public service districts, counties, and municipalities or any other indebtedness now or hereafter authorized by Article X of the Constitution of this state,

5) any final judgment from the circuit court pertaining to elections and election procedure

6) any order limiting an investigation by a State Grand Jury under S C Code Ann Section 14 7 1630

7) any order of the family court relating to an abortion by a minor under S C Code Ann Section 44-41 33

Very truly yours,

Kenneth A. Richstad

Kenneth A Richstad
CLERK

KAR/ma
cc W Allen Nickles III Esquire
Dona L Guffey Esquire

The South Carolina Court of Appeals

KENNETH A RICHSTAD
CLERK

V CLAIRE ALLEN
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May 14, 2008

Lake Eric Summers, Esquire
Malone Thompson Summers & OH, LLC
339 Heyward St
Columbia, SC 29201

W Allen Nickles, III, Esquire
Dona L Guffey, Esquire
Gergel, Nickles & Solomon, PA
P O Box 1866
Columbia, SC 29202

Re Bell, James "Cal" v SCDC

Dear Counsel

Enclosed is the opinion of the Court of Appeals in this case

Pursuant to Rule 221(b) of the South Carolina Appellate Court Rules, the remittitur in this case will be sent to the Clerk of Court for Richland County after fifteen (15) days, exclusive of the date of filing of this opinion

No extension for a petition for rehearing will be granted except in the most extraordinary circumstances and, except in the rarest cases, with seven days' notice

Sincerely,

Renee S Johnson
Administrative Specialist

KAR/rj

LAW OFFICES

MAY 15 2008

MALONE THOMPSON
SUMMERS & OTT, LLC

2022

THIS OPINION HAS NO PRECEDENTIAL VALUE IT SHOULD NOT BE CITED OR RELIED ON AS PRECEDENT IN ANY PROCEEDING EXCEPT AS PROVIDED BY RULE 239(d)(2), SCACR

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams, and Paula Woodlief, Respondents,

v

South Carolina Department of Corrections and Palmetto Unified School District No 1, Defendants,

Of Whom South Carolina Department of Corrections is the Appellant

---

Appeal From Richland County
Gordon G Cooper, Circuit Court Judge

2023

Unpublished Opinion No 2008-UP-257
Submitted May 1, 2008 – Filed May 14, 2008

APPEAL DISMISSED

Lake Eric Summers and Malone Thompson Summers, both of Columbia, for Appellant

W Allen Nickles, III, and Dona L Guffey, both of Columbia, for Respondents

PER CURIAM South Carolina Department of Corrections appeals the circuit court's order directing the Office of Human Resources to reinstate a grievance for a hearing before the State Employee Grievance Committee We dismiss[1] pursuant to Rule 220(b), SCACR, and the following authorities Levine v Sonoco Prods Co, 339 S C 492, 494, 530 S E 2d 127, 128 (2000), Montjoy v Asten-Hill Dryer Fabrics, 316 S C 52, 52, 446 S E 2d 618, 618 (1994), Owens v Canal Wood Corp, 281 S C 491, 492, 316 S E 2d 385, 385 (1984), Hunt v Whitt, 279 S C 343, 343, 306 S E 2d 621, 622 (1983) (all finding a circuit court order remanding a case for additional proceedings before an administrative agency is not directly appealable)

APPEAL DISMISSED.

HEARN, C J , and SHORT and KONDUROS, JJ , concur.

[1] We decide this case without oral argument pursuant to Rule 215, SCACR

STATE OF SOUTH CAROLINA

State Budget and Control Board

OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

CONVERSE A CHELLIS III CPA
STATE TREASURER

RICHARD ECKSTROM CPA
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

DANIEL T COOPER
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SAMUEL L WILKINS
DIRECTOR

June 4, 2008

CERTIFIED MAIL

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202

Ms Robin N Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Re James "Cal" Bell, et al v South Carolina Department of Corrections (SCDC)

Dear Mr Nickles and Ms Gracien

On May 20, 2008, this office received a copy of The South Carolina Court of Appeals opinion dated May 14, 2008, dismissing SCDC's appeal of Judge Gordon G Cooper s Order issued on January 10, 2007 Judge Cooper's Order states, in part, that "there exist disputed issues of material fact which entitle Plaintiff's to a hearing before the State Employee Grievance Committee" and "the Office of Human Resources is directed to reinstate the grievance for a hearing before the State Employee Grievance Committee "

Section 8-17-340 (A) of the S C Code of Laws of 1976, as amended, states in part "There is created the State Employee Grievance Committee constituted and appointed to serve as an administrative hearing body for state employee appeals " Section 8-17-320 (2) defines appeal as "the request by a covered employee to the State Human Resources Director for review of an agency's final decision concerning a grievance " In addition, State Human Resources Regulation 19-718 05 (F) provides "If the State Human Resources Director determines that additional action by the agency is necessary and appropriate, he may remand the appeal to the agency "

Since the grievants have not had an opportunity to complete SCDC's internal grievance process, additional action by the agency is necessary to establish a record and decision, concerning the grievance, for review by the State Employee Grievance Committee Therefore, to effectuate the intent of Judge Cooper's Order and the opinion of the South Carolina Court of Appeals, the State Human Resources Director remands this matter to SCDC for processing according to its grievance policy In addition, since Judge Cooper's Order has established that material issues of fact exist regarding the application of SCDC's Reduction in Force policy in this case, SCDC must address the substantive issues regarding the grievance

If SCDC's final decisions are unfavorable to the grievants, or SCDC fails to make a decision within 45 calendar days of receipt of this remand, the grievants may institute an appeal to the State Human Resources Director within the time frames set forth in the State Employee Grievance Procedure Act and a hearing will be schedule before the State Employee Grievance Committee in accordance with Judge Cooper's Order

Sincerely,

Terry M. Baggott

Terry M Baggott
Managing Partner
Alternative Dispute Resolution Program

Enclosure

STATE OF SOUTH CAROLINA

State Budget and Control Board

OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

CONVERSE A CHELLIS III CIA
STATE TREASURER

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SAMUEL L WILKINS
DIRECTOR

July 28, 2008

Ms Robin Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221

James "Cal" Bell, et al
Appellants' Name

Various
Job Classification

Dear Ms Gracien

The appellants have appealed to the State Human Resources Director concerning a grievance arising from employment with your agency Grounds for the appeal are contained in the enclosed copies of the State Employee Grievance Procedure State Appeal Forms

The certified record of this appeal previously sent to the Court of Common Pleas will be included in the record of appeal currently before the State Human Resources Director Please send us any additional documents to supplement the record

The requested information and materials must be returned to the Office of Human Resources/Grievance and Mediation Services within fifteen (15) calendar days Also, any future correspondence sent to the Office of Human Resources, excluding the appellant's record, should be copied to the other party involved

Sincerely,

Sandra Brabham

Sandra Brabham
Alternative Dispute Resolution Program

Enclosure
cc Mr Jon Ozmint, without enclosure
Mr Lake Summers

FAX
(803) 737 0968

STATE OF SOUTH CAROLINA

State Budget and Control Board

OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

CONVERSE A CHELLIS III CPA
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RICHARD ECKSTROM CPA
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SAMUEL L WILKINS
DIRECTOR

July 28, 2008

Mr W Allen Nickels III
Gergel, Nickles & Solomon P A
Attorneys at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re James "Cal" Bell, et al v S C Department of Corrections (SCDC)

Dear Mr Nickles

The Office of Human Resources has received the State Employee Grievance Procedure State Appeal Forms for the above appellants and has requested the employing agency to send the documents relating to the appeal Once these documents have been received and reviewed you will be contacted Also, all future correspondence sent to the Office of Human Resources should be copied to the employing agency

Every effort is being made to process Mr Bell et al's appeal as quickly as possible

Sincerely,

Sandra Brabham

Sandra Brabham
Alternative Dispute Resolution Program

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H FRANK MALONE
1930-2002

August 25, 2008



VIA HAND DELIVERY

Mr Terry Baggott
State Budget and Control Board
Office of Human Resources
1201 Main Street, Suite 800
Columbia, South Carolina 29201

Re Submission of Documents from SCDC to Supplement the Record on Appeal before the State Human Resources Director in Bell, et al , v PUSD No 1 and SCDC

Dear Terry

Pursuant to the July 28, 2008 letter from Sandra Brabham of the Office of Human Resources' Alternative Dispute Resolution Program and in accordance with our discussions during our August 15, 2008 meeting as well as our August 20, 2008 teleconference with Dona Guffey, I submit documents from SCDC to supplement the record on appeal in the above referenced matter currently pending before the State Human Resources Director

SCDC's submission consists of 339 pages of documents, and I prepared a two-page Index detailing the precise contents of SCDC's submission This Index appears at the very beginning of the documents accompanying this letter

Please don't hesitate to contact me should you have any questions regarding this letter, the documents accompanying this letter, or any other aspect of this matter

I look forward to working with you as we prepare for the mediation of this matter and, if necessary, the hearing of this matter before the State Employee Grievance Committee

AFFILIATE OF THE WORKLAW® NETWORK THE NATIONWIDE NETWORK OF LABOR AND EMPLOYMENT LAW FIRMS
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August 25, 2008
Re Submission of Documents from SCDC to Supplement the Record on Appeal before the State Human Resources Director in Bell, et al , v PUSD No 1 and SCDC

As always, I remain

Very respectfully yours,

Lake E Summers
Outside Counsel for SCDC

Enclosures

Cc
W Allen Nickels, III, Esquire, and Dona L Guffey, Esquire, Grievants' Counsel (w/ enclosures)
David Tatarsky, Esquire, General Counsel for SCDC (via PDF e-mail w/o enclosures)
Bob Peterson, Director of SCDC's Human Resources Division (via PDF email w/o enclosures)
Sandra Brabham, Alternative Dispute Resolution Program (w/o enclosures)

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April 1, 2003

South Carolina Department of Corrections

MARK SANFORD Governor
JON E. OZMINT Director

Today we have notified our employees of a Reduction in Force and Reorganization One hundred and forty eight South Carolina Department of Corrections' employees are affected and will be laid-off on June 1 2003 This is a large reduction for this or any other state agency It is even larger when viewed in the context of the past two years

As you know this agency will close out this fiscal year on June 30 having spent $27 7 million more than the final budget allocated by our Legislature and the Budget and Control Board Based upon revenue projections for next year and based on the appropriations bill passed by the House, our budget shortfall next year could be as bad or even worse In order to address next year's problem, we must act now

This first round of reductions and reorganization will create a leaner less costly and more efficient headquarters The total net savings to the taxpayer will range from $5 million to $8 million In fact, headquarters will bear a greater burden in this first round of reductions than any of our prisons No uniformed security personnel will be cut

This reduction in force plan will affect the following functional areas

- Headquarters management and administrative support staff,
- Administration and management of support programs, and
- Certified educational personnel and educational support staff

In developing this plan we have included input from those responsible for the affected areas and we have done so in a manner that will have as little impact as possible on our

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most important functions of security and safety Two factors drove our deliberations the necessity of further cuts and my determination to allow no further cuts in the frontline ranks of our uniformed staff

Over the past two years our budget has been cut by 25% over $70 million We have lost more than 500 security personnel, including more than 400 correctional officers, even as our inmate population has grown by more than 2,300

This plan does not protect the highest paid employees at the expense of others For example the average salary of those positions affected by this reduction in force is $41 900 Yet, the average salary within South Carolina Department of Corrections is $28,953 The average salary of our most essential employees, correctional officers, is $22,886

Finally, the decision to reduce educational personnel is unfortunate Until this time, even when essential functions such as security and maintenance have been cut, education has been exempted However, that functional area is one of the most expensive functions in this agency In fact, outside of our medical personnel, there is no comparable group of employees with higher average salaries than our principals, counselors and teachers As you can see, our average warden, with responsibilities on a twenty-four hour basis for hundreds of lives, earns $63, 000 per year The average associate warden earns $50,000 By contrast, the average principal earns over $67,000 and supervises 10 teachers and staff Our average guidance counselor earns $59,000 more than many wardens and $9,000 more than our associate wardens

We have worked closely with our Superintendent of Education, Wendell Blanton, to

ensure that we continue to educate inmates who are under the age of 21 These reductions are also designed to maximize the limited state and federal educational funding we receive through the state Department of Education. We look forward to the day when we can rebuild our educational program in a sustainable and efficient manner

These lean budget years are requiring painful actions We will take all reasonable steps to provide assistance to the staff who will be affected by these actions The staff who will be affected by this are all dedicated employees who have done a good job for this Department and I have no doubt that they would have continued to do so

We will continue to evaluate other functional areas for further savings and efficiency When we can safely do so, we will implement further changes to increase value to the taxpayers and to further reduce future deficits

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	COURT OF COMMON PLEAS FIFTH JUDICIAL CIRCUIT
James "Cal" Bell Othella Bernard, Kathenna Bower Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Green Etta Jane Jones Geneva M Martin, Mary H McCabe, Beverly McClanahan Max D Randolph Carolyn McIver Smith, Maggie G Williams, and Paula Woodlief Plaintiffs vs South Carolina Department of Corrections and Palmetto Unified School District No 1, Defendants	2004 MAY -7 A 11:07 Civil Action No: 04-CP-40-1761

DEFENDANTS' RESPONSE TO PLAINTIFFS' PETITION FOR JUDICIAL REVIEW

COME NOW Defendants South Carolina Department of Corrections (Department") and Palmetto Unified School District No 1 by and through their Counsel, and respond to Plaintiffs' petition for judicial review regarding the outcome of their grievances with the Department.

Plaintiffs petition for judicial review arises from their separations of employment due to a Reduction in Force (RIF ") effective June 1, 2003 On June 12 2003 Plaintiffs filed administrative grievances On June 16, 2003, the Department issued a decision

SCDC
0004 2036

denying Plaintiffs grievances On June 20 2003 Plaintiffs filed grievance appeals to the State Office of Human Resources On January 9 2004 the Director of the Office of Human Resources issued a letter denying Plaintiffs appeals stating that the Department's RIF was not an improper or inconsistent application of the agency's RIF policy or plan

On February 2, 2004, Plaintiffs requested reconsideration of the Director's January 9 determination In response on February 25 2004 the Department filed a response stating that reconsideration of the Director's determination was unnecessary as Plaintiffs had not raised any issue of whether the Department had improperly or inconsistently applied its RIF policy or plan After reviewing Plaintiffs' request for reconsideration and the Department s response on March 22, 2004 the Director issued a letter denying Plaintiffs' request

On April 6 2004 Plaintiffs filed the above-captioned petition for judicial review In response to Plaintiffs' petition and pursuant to the Administrative Procedures Act (South Carolina Code Section 1-23-380(A)(3)) on April 28 2004 the Office of Human Resources submitted for the Court's consideration a certified copy of the entire record of the Plaintiffs grievance proceedings which are under judicial review

In their Petition, Plaintiffs assert that during the administrative grievance process the Department failed to provide them access to information relevant to their claims (Petition ¶ 18) Plaintiffs request that the Court grant them leave to present 'additional evidence for consideration in the above-captioned judicial review (Petition ¶ 18) Plaintiffs request should be denied

First, Plaintiffs have not demonstrated, as required by South Carolina Code Section 1-23-380(A)(4) that additional evidence should be submitted to the Court in consideration of this matter [1] Rather, Defendants assert that the record submitted to the Court is a complete and accurate record of Plaintiffs' grievances Defendants believe that upon review of the submitted record, this Court will affirm Defendants' decisions *See* S C Code Ann § 1 23-380(A)(6) Second during the grievances, the Department provided adequate information to Plaintiffs showing that it complied with its RIF policy and plan and any additional materials requested by Plaintiffs are not relevant to this issue

THEREFORE Defendants respectfully request that this Court affirm their decisions regarding Plaintiffs grievances

Dated this the 6 day of May 2004

Respectfully submitted,

HORGER, HORGER & JUSTICE LLC

By _____

Scott T Justice
Kathryn R. Britt
Attorneys for Defendants
160 Centre Street
P O Box 518
Orangeburg, SC 29116-0518

[1] Even if Plaintiffs could convince the Court that additional evidence should be presented, the Court should then order that the additional evidence be taken before the agency upon conditions determined by the Court. S C Code Ann. § 1-23 380(A)(4) At that point, the agency *may* modify its findings and decision by reason of the additional evidence *Id.*

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

COURT OF COMMON PLEAS
FIFTH JUDICIAL CIRCUIT
C/A No 04-CP-40-1761

James "Cal Bell, Othella Bernard, Katherina Bower, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K. Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Green, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief

Plaintiffs,

vs

South Carolina Department of Corrections and Palmetto Unified School District No 1

Defendants

2004 MAY -7 A 11:11 07

CERTIFICATE OF SERVICE BY MAIL

I hereby certify that I have mailed a true and correct copy of the withinMotion/Pleading/Document to all counsel of record by mailing a copy properly addressed with sufficient postage affixed thereto this 6th day of May, 2004

HORGER, HORGER & JUSTICE, LLC

By Nita M Edwards

Secretary to Scott T Justice

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
	C/A NO 04-CP-40-1761
James "Cal" Bell, Othella Bernard,)	
Katherina Bower, Linda M W Bratton,)	
Ann T Bridges, Rance C Cobb, Jeannie)	
B Croxton, Bernetha L Culbreath,)	
William K. Dreyer, Jacqueline D Farr,)	
Ruth Fritts, Nancy Glenn, Etta Jane)	
Jones, Geneva M Martin, Mary H)	
McCabe, Beverly McClanahan, Max)	
D Randolph, Carolyn McIver Smith,)	
Maggie G Williams and Paula Woodlief,)	
)	
Plaintiffs,)	
)	
vs)	MOTION FOR DISCOVERY AND
)	MEMORANDUM IN SUPPORT
South Carolina Department of)	
Corrections and Palmetto Unified)	
School District No 1,)	
)	
Defendants)	

2004 NOV 19 AM 10 04

CLERK C C & GS

INTRODUCTION

Plaintiffs are each professional, certified educators formerly employed in full-time instructional or administrative positions in the Palmetto Unified School District. This unified school district was created by statute to serve inmates in the South Carolina Department of Corrections Plaintiffs were each removed from their positions as the result of a reduction in force implemented effective June 1, 2003 Plaintiffs have exhausted all administrative remedies and are now before this Court seeking reinstatement to their former positions of employment

MOTION

By this motion, Plaintiffs seek an order compelling the Defendants to provide responses to discovery pursuant to S C Code Ann § 1-23-380(4) and (5) The information requested is necessary to provide the Court a full and adequate record from which to rule regarding the Defendants irregularities in the administration of the reduction in force resulting in Plaintiffs' reassignments, demotions and separations from employment See, Ross v Medical University of South Carolina 317 S C 377 453 S E 2d 880 (1995)(Circuit Court has jurisdiction to order discovery on appeal from an administrative decision) Specifically, Plaintiffs request that this Court order Defendants to participate in the following discovery

1 Provide responses to Plaintiffs First Set of Interrogatories and Request for Production dated June 15, 2004 (Attachment 1(N))

2 Provide full responses to Plaintiffs FOIA request dated September 10 2004 (Attachment 1(R))

3 Make available for deposition the following individuals

Jon Ozmint, Director, South Carolina Department of Corrections,

John Near, Human Resources Director, South Carolina Department of Corrections,

Wendell Blanton Superintendent of the Palmetto Unified School District

MEMORANDUM IN SUPPORT

This action arises from a reduction in force implemented by the Defendants effective June 1, 2003 Each Plaintiff was adversely affected by the reduction in force Plaintiffs were removed from their positions of employment with resulting loss of pay and retirement benefits which will affect them for their lifetimes Plaintiffs challenged their selection for reduction in force by initiating a grievance which was rejected by the Defendants Thereafter Plaintiffs appealed to the Office of Human Resources for the South Carolina Budget & Control Board During their grievance and

subsequent appeal, Plaintiffs requested information from the Defendants regarding issues central to the reduction in force These issues include the identification of individuals and/or positions that were protected or removed from consideration for reduction in force, lists of positions occupied before and after the reduction in force, lists of positions filled following the reduction in force lists of new positions, reclassifications, promotions and transfers implemented during the period leading up to and following the reduction in force An illustration of the Plaintiffs efforts to obtain this public information from the Defendants is provided in the correspondence included as Attachment 1 to this motion and memorandum

Throughout this process, the Defendants have resisted Plaintiffs efforts to obtain information relating to their selection for reduction in force Examples of Defendants' responses to Plaintiffs requests for information are provided in Attachment 1 Following the denial of Plaintiffs' appeal by the Office of Human Resources this action was initiated Among the claims in this case is the assertion that the Plaintiffs were singled out for separation from employment in retaliation for bringing a legal action which resulted in a decision by the South Carolina Court of Appeals that the Defendants were in violation of law in compensating educators within the Department of Corrections In fact, Plaintiffs are informed that the Director of the Department made reference to this litigation in addressing the need to reduce the number of educators at the Department Plaintiffs are further informed that departmental records demonstrate that educators were selected for reduction in force in a manner disproportionate to their numbers in the entire workforce and that senior educators, such as Plaintiffs, were denied "bumping rights by arbitrary drawing of geographic lines within the "unified" school district established by the General Assembly

CONCLUSION

Plaintiffs seek information which relates to the decision by government agencies to take action which compromised the ability of this State to provide educational and rehabilitative services to inmates Plaintiffs are entitled to the discovery requested under Rules 33 and 34 of the South Carolina Rules of Civil Procedure, as requested in interrogatories and request to produce served upon the Defendants on June 15 2004 (see Attachment 1(N)), the South Carolina Freedom of Information Act, S C Code Ann § § 30-4-10 et seq as served upon Defendants on September 10, 2004 (see Attachment 1(R)) and discovery provisions of the South Carolina Administrative Procedures Act as set forth in S C Code Ann § 1-23-380(4) and (5)

GERGEL, NICKLES & SOLOMON P.A

By: Dona Guffey

W Allen Nickles, III
Dona L. Guffey
1519 Richland Street
Post Office Box 1866
Columbia, South Carolina 29202-1866
(803) 779-8080

Attorneys for Plaintiffs

November 18, 2004
Columbia, South Carolina

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
	C/A NO 04-CP-40-1761
James "Cal" Bell, Othella Bernard,)	
Katherina Bower, Linda M.W Bratton,)	
Ann T Bridges, Rance C Cobb, Jeannie)	
B Croxton, Bernetha L. Culbreath,)	
William K. Dreyer, Jacqueline D Farr,)	
Ruth Fritts, Nancy Glenn, Etta Jane)	
Jones, Geneva M Martin, Mary H)	
McCabe, Beverly McClanahan, Max)	
D Randolph, Carolyn McIver Smith,)	ATTACHMENT 1
Maggie G Williams and Paula Woodlief,)	
)	TO PLAINTIFF'S
Plaintiffs,)	MOTION FOR DISCOVERY AND
)	MEMORANDUM IN SUPPORT
vs)	
)	
South Carolina Department of)	
Corrections and Palmetto Unified)	
School District No 1,)	
)	
Defendants)	

ATTACHMENT 1

A Letter dated August 22 2003 from Terry Baggott, Office of Human Resources

B Letter dated August 29, 2003 from W Allen Nickles, III, Esquire

C Letter dated September 8, 2003 from Dona L Guffey, Esquire

D Letter dated September 8, 2003 from Robin M Gracien South Carolina Department of Corrections

E Letter dated September 9, 2003 from W Allen Nickles, III, Esquire

F Letter dated September 12, 2003 from Dona L Guffey, Esquireg

G Letter dated October 1, 2003 from Deborah Drucker Deutschmann, Esquire, South Carolina Department of Corrections

H Letter dated October 9, 2003 from Chris Poore, Office of Human Resources

I Letter dated October 14, 2003 from Dona L. Guffey, Esquire

J Letter dated November 10, 2003 from Deborah Drucker Deutschmann, Esquire, South Carolina Department of Corrections

K Letter dated February 2, 2004 from W Allen Nickles III Esquire

L Letter dated February 25, 2004 from Deborah Drucker Deutschmann Esquire, South Carolina Department of Corrections

M Letter dated March 22 2004 from Samuel L Wilkins, Director Office of Human Resources

N Plaintiffs First Set of Interrogatories to Defendants dated June 15, 2004

O Letter dated August 23 2004 from Scott T Justice, Esquire

P Letter dated August 30, 2004 from Dona L Guffey, Esquire

Q Letter dated September 8, 2004 from Kathryn R. Britt, Esquire

R Letter dated September 10, 2004 from Dona L. Guffey, Esquire

S Letter dated October 6, 2004 from Deborah Drucker Deutschmann, Esquire, South Carolina Department of Corrections

T Letter dated October 29, 2004 from Deborah Drucker Deutschmann, Esquire, South Carolina Department of Corrections

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD, CHAIRMAN
GOVERNOR

GRADY L. PATTERSON, JR.
STATE TREASURER

RICHARD ECKSTROM
COMPTROLLER GENERAL

HUGH K. LEATHERMAN SR.
CHAIRMAN, SENATE FINANCE COMMITTEE

ROBERT W. HARRELL, JR.
CHAIRMAN, WAYS AND MEANS COMMITTEE

FRANK W. FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 1000
COLUMBIA, SOUTH CAROLINA 29201
(803) 737-0900

SAMUEL L. WILKINS
DIRECTOR

August 22 2003

Ms Donna Guffey
Attorney at Law
Post Office Box 1866
Columbia South Carolina 29202-1866

Re James Bell, Othella Bernard Katherina Bowyer Linda Bratton Ann Bridges Rance Cobb Jeannie Croxton Bernetha Culbreath, William Dreyer Jacqueline Farr Ruth Fritts Nancy Glenn Etta Jane Jones Geneva Martin Mary McCabe Beverly McClanahan, Max Randolph, Carolyn Smith, Maggie Williams and Paula Woodlief v S C Department of Corrections (SCDC)

Dear Ms Guffey

This letter is to request additional information regarding the above referenced appeals filed with the State Human Resources Director This office is seeking clarification concerning the fourth contention listed in your letter of June 20 2003 which states

> 4 Individuals and/or positions were arbitrarily protected or removed from consideration for separation for reasons unrelated to RIF criteria

In addition please send a copy of your response to Ms Gracien If we do not receive a response by Friday August 29 2003 we will make a determination based on the information that we have

Sincerely,

Terry M Baggett EC

Terry M Baggett
Grievance and Mediation Services Manager

c Mr John Near
Ms Robin Gracien

FAX (803) 737-0968

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- ATTORNEYS AT LAW
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August 29, 2003

Terry M Baggott
State Budget and Control Board
1201 Main Street Suite 1000
Columbia, South Carolina 29201

RE Palmetto Unified School District Reduction In Force

Dear Terry

In preparing a response to your letter of August 22 2003, the following materials which should be available from your office are required

A) A complete copy of materials submitted by the Department of Corrections in support of its reduction in force implemented effective June 1 2003

B) A complete copy of all materials provided to the Department of Corrections by the Office of Human Resources in reference to the reduction in force

C) A complete list of all positions occupied at the Department of Corrections prior to the reduction in force

D) A complete list of all positions eliminated as result of the reduction in force

E) A complete list of all vacancies existing immediately prior to the reduction in force

F) A complete list of all vacancies filled since the reduction in force

G) A complete list of all new positions approved since the reduction in force

H) A complete copy of materials submitted by the Department of Corrections in support of any retirement incentives offered during the calendars years 2002 and 2003

I) A complete list of new positions approved for the Department of Corrections during the calendar years 2002 and 2003

J) A complete list of all reclassifications and promotions and transfers implemented by the Department of Corrections during the calendar years 2002 and 2003

I very much appreciate your assistance and cooperation in this matter and request an opportunity to review these materials prior to responding to your letter of August 22 2003 If any of the materials requested are not available or available only from another source, please contact me

Sincerely,

W Allen Nickles III

WAN/pgm
File # 03-156

cc Mike Montgomery (via facsimile 799-2755)

03-156 08a wpd

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September 8 2003

Via Hand Delivery
Terry M Baggott
State Budget and Control Board
Office of Human Resources
1201 Main Street Suite 1000
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Terry

The following is a preliminary response to your request for additional information seeking clarification concerning the fourth issue listed in our grievance letter of June 20, 2003 which states

4 Individuals and/or positions were arbitrarily protected or removed from consideration for separation for reasons unrelated to RIF criteria.

This is a preliminary response as we have not received the requested information from your office as well as Mike Montgomery's office We are in receipt of your letter of September 5 2003 to Ms Robin Gracien and reserve the right to supplement this response upon receipt of the requested information

a The Principal and special education teacher at the Tyger River facility were not subject to the RIF

b It is our understanding that a reorganization took place prior to the first reduction in force that shifted high-ranking administrators and provided some promotions prior to the actual first wave of RIF For example, Mike Metts, Canine Division Director, was moved prior to RIF as his original position was eliminated. Also, Brenda Reed was moved just prior to RIF from the Training Academy to Personnel Ms Reed s previous position at the Academy was eliminated by RIF

c Three Division Directors Richard Bazzle Bernard Mackey and Judy Anderson, received demotions but kept their salaries without confinement in

competitive areas This was done just a few days before the RIF was announced to those who would be displaced Additionally several employees were permitted to maintain their salary with a change in position Bernard McKie, Warden, Kirkland R & E Center, and Laurie Bessinger, Director Division of Security and Training It is our understanding that Mr Bessinger s move was a promotion

d Director Ozmint stated on multiple occasions that most of the layoffs came from those employees in Headquarters as he was including the 87 educators in his Headquarters count to give the impression that most of the cuts were management

e Ms Wessinger, Administrative Assistant at Watkins or Walden was recalled to her position It is our understanding that Ms Wessinger had been bumped by a teacher and was recalled to her position in error as there were other people in line who had bumping rights prior to Ms Wessinger being recalled

f Glen Eaves an uncertified probationary employee did not lose his position

g Four staff members in the Division of Education at Headquarters Wendell Branton Kathy Jackson, Tommy Wicker and Marilyn Dozier received letters from Director Ozmint extending an invitation for retirement and giving them the option to return to work in 60 days as a temporary employee with a salary not to exceed $50,000 per year or 75% of his or her salary Two teachers at the Turbeville Institution are being allowed to retire and come back to work for 75% of their salary Warden Koley Rushton at McCormick Correctional is being allowed to retire and come back to work at 75% of his salary This offer was not extended to others similarly situated in the RIF process

h Medical service providers, food service workers and correctional officers were exempt from the RIF and these job categories were actually hiring during this time period

i Rose Reuger bumped into a math position, subsequently resigned within a few weeks of the bump The position still has not been filled at this time

j Employees in Columbia were offered jobs for which they were unqualified other than correctional officers However educators were only offered correctional officer positions

k Jackie Benning, former Guidance Counselor at Manning Institution, is currently working in two positions one believed to be a part-time data entry position Other educators affected by RIF were only offered correctional officer positions even if qualified for other positions For example Rance Cobb former Principal at Leath, qualified for two positions at Leath but was not offered either although both were actively open at the time of RIF

l Ricky Harrison an employee in the security department whose position was eliminated through the RIF bumped a print shop supervisor It is our understanding that Mr Harrison bumped Ken Kinney who runs the print shop However, Mr Harrison had no experience with print shop materials and Mr Kinney was allowed to remain Mr Harrison remains assigned to the print shop without a specific job assignment

m It is our understanding that the Leath Institution was targeted because 7 out of 9 educators at Leath hold Master's degrees or above and have the highest educator salaries The competitive areas appear to be drawn so that these employees would have no bumping opportunities

n Educators were targeted in retaliation for a previous lawsuit against the Department of Education in which 17 of the 20 RIF grievants were Plaintiffs Max Randolph, grievant, had a conversation with Director Ozmint wherein Director Ozmint stated to Mr Randolph that the teachers should not have sued for pay increases because it was wrong

o Mr Aiken, retired educator, was hired in March 2003 to lead computer classes at the Manning institution filling a position that the Department of Corrections knew could be utilized by an employee subject to RIF It is our understanding he is still in that position

p The Operational Review Manager at Wateree Correctional Institute was offered a Sergeant position instead of a regular Correctional Officer position despite the fact that she is not certified as an officer

q Grievant Maggie Williams, certified in secondary English, was bumped from her position by a Ms Myers who holds only elementary certification Palmetto Unified School District teachers remaining are now being told that they must obtain certification in the area that they have been placed within a certain time frame

r John Ozmint Director received an 8% increase in salary during the time that the RIF plan was designed and implemented Director Ozmint also approved structural improvements in the amount of $100 000 for the home located on South Carolina Department of Corrections property where he resides during his term Former Director Gary Manard recently had substantial work done on the residence

s Ms Lakin, an educator at Stevenson Correctional holds a teaching position but is not currently teaching and is reported to have less service time than other educators affected by the RIF

t The Principal and a vocational teacher at the Wateree facility which remains operational were the only educators at that facility affected by the RIF It is our understanding that the Principal Bert Haynsworth is an older employee with substantial years of service

u Hoyt Sharpe, Director of Vocational Education remains unaffected by the RIF even though there are no vocational programs to supervise

We appreciate your careful consideration and look forward to receiving your responses to our request for additional information as well

Sincerely,

Dona L Guffey

DLG/pfb

File #03-156

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

September 8, 2003

VIA FACSIMILE & U S MAIL

Mr Terry M Baggott
Grievance and Mediation Services Manager
Office of Human Resources
1201 Main Street, Suite 1000
Columbia South Carolina 29201

RE RIF (Education) v SCDC

Dear Mr Baggott

This letter is in response to your request for a response to Mr Nickels' letter dated August 29 2003 regarding the grievance appeal of his clients

On August 22 2003 you requested a clarification of a contention Mr Nickels presented in his grievance appeal to the Office of Human Resources However Mr Nickels was not able to respond and in turn is asking for additional information to explain his objection to the RIF process

It is the agency s position that your request to clarify a contention in the grievance appeal was not answered and should be cause for removal of the item from consideration in their appeal

Sincerely

Robin M Gracien, Chief
Employee Relations Branch
Division of Human Resources

cc Grievance File
Mr W Allen Nickels

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September 9, 2003

Via Facsimile (737-0968)
Terry M Baggott
State Budget and Control Board
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Terry

I appreciate your providing a facsimile copy of Ms Gracien s letter to you of September 8, 2003 As you are aware, a preliminary response has been provided to your request for information of August 22, 2003 As we have previously expressed, however additional information is needed in order to respond fully to your inquiry

It has been our understanding that Mike Montgomery represents the Department of Corrections in this matter Accordingly, we have not communicated directly with Ms Gracien By copy of this letter, I am requesting clarification as to the appropriate parties for this office to address in reference to the pending grievance

It is my understanding that the Office of Human Resources is responsible for assisting both parties in grievance matters In this case, if the Department is unwilling to provide information which should be of a public nature, I request your assistance in obtaining that information on behalf of the employees

I look forward to hearing from you

Sincerely,

W Allen Nickles, III

WAN/pfb
cc Mike Montgomery, Esquire (via facsimile)
File #03-156

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September 12, 2003

Ms Deborah Drucker Deutschmann
Deputy General Counsel
SC Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

RE James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K. Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H. McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie L Williams, Paula Woodliefv SC Department of Corrections

Dear Ms Deutschmann

We are in receipt of your letter to Mr Terry Baggott dated September 11, 2003, wherein you stated that your office will be representing the Department in administrative proceedings under the State Employee Grievance Procedure Act Enclosed please find letters to Mike Montgomery and Terry Baggott dated July 23, 2003 and August 29, 2003 respectively, requesting additional information regarding reduction in force issues We renew our request for this information

If you have any questions please do not hesitate to contact me

Sincerely,

Dona L Guffey

DLG/pfb
Enclosures
File #03-156

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July 23, 2003

Via Facsimile (799-2755)
Michael H Montgomery, Esquire
Post Office Box 11886
Columbia South Carolina 29211

RE Palmetto Unified School District RIF

Dear Mike

With your correspondence of July 21, 2003 I received five enclosures These appear to provide for FY00-01 financial information on accounts 810, 820, 830, 840, 850 860 and 870 A total for FY00-01 is also provided For FY01-02 information is provided on accounts 810, 820 and 870 only No information is provided for FY02 03 Apparently, this information was compiled on June 12, 2003 Please let me know if the Department has supplemental information and if the information provided for FY01-02 is complete

I look forward to hearing from you

Sincerely

W Allen Nickles, III

WAN/pfb

File #03-156

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August 29, 2003

Terry M. Baggott
State Budget and Control Board
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE: Palmetto Unified School District Reduction In Force

Dear Terry:

In preparing a response to your letter of August 22, 2003, the following materials which should be available from your office are required:

A) A complete copy of materials submitted by the Department of Corrections in support of its reduction in force implemented effective June 1, 2003.

B) A complete copy of all materials provided to the Department of Corrections by the Office of Human Resources in reference to the reduction in force.

C) A complete list of all positions occupied at the Department of Corrections prior to the reduction in force.

D) A complete list of all positions eliminated as result of the reduction in force.

E) A complete list of all vacancies existing immediately prior to the reduction in force.

F) A complete list of all vacancies filled since the reduction in force.

G) A complete list of all new positions approved since the reduction in force.

H) A complete copy of materials submitted by the Department of Corrections in support of any retirement incentives offered during the calendars years 2002 and 2003

I) A complete list of new positions approved for the Department of Corrections during the calendar years 2002 and 2003

J) A complete list of all reclassifications and promotions and transfers implemented by the Department of Corrections during the calendar years 2002 and 2003

I very much appreciate your assistance and cooperation in this matter and request an opportunity to review these materials prior to responding to your letter of August 22, 2003 If any of the materials requested are not available or available only from another source please contact me

Sincerely,

W Allen Nickles III

WAN/pgm
File # 03-156

cc Mike Montgomery (via facsimile 799-2755)

03 156 08a wpd

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

October 1, 2003

Mr Terry M Baggott
Grievance and Mediation Services Manager
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Re James Bell, Othella Bernard, Katherina Bowyer, Linda Bratton Ann Bridges Rance Cobb, Jeannie Croxton Bernetha Culbreath William Dreyer Jacqueline Farr Ruth Fritts Nancy Glenn, Etta Jane Jones Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith Maggie Williams and Paula Woodlief v S C Department of Corrections

Dear Mr Baggott.

The following information is provided in response to your September 15 2003 request for me to respond to prior letters submitted by the law firm of Gergel Nickles & Solomon P.A

In response to the September 8 2003 request, I submit the following

a The positions of Principal and Special Education Teacher were not eliminated due to the Reduction in Force (RIF) in competitive area 11, which included the Appalachian Office, Tyger River, Perry, Livesay, and Northside Correctional Institutions It is the Department's position that throughout the RIF process it retains the right to make management decisions regarding the administration of resources

b The complex mission of an agency which includes 29 correctional institutions, nearly 25 thousand inmates, and nearly 6 000 employees requires continuous analysis, reorganization and movement of staff both prior to and after a RIF It is the Department s position that this question does not pertain to the grievance issue (the manner in which the RIF was executed) currently before the Office of Human Resources The Department of Corrections retains the right to make management decisions regarding the administration of resources

c Warden vacancies had existed at several institutions within the agency due to the budget deficit In an effort to further reduce expenses, the agency Director eliminated several executive staff positions and moved individuals into positions where they were needed most Mr Bessinger who was the Warden at Kirkland Correctional Institution, was given an increase in duties and responsibilities without a promotion or pay increase Further, it is the Department's position that this question does not pertain to the grievance issue (the manner in which the RIF was executed) currently before the Office of Human Resources

P O Box 21787 4444 Broad River Road Columbia SC 29221 1787 Telephone (803) 896 8555

d In a memorandum to all employees on March 31 2003 Director Ozmint stated that 148 positions were identified for RIF in many areas throughout the agency to reduce staff, primarily in the headquarters, institutional non-security, and support functions Educational Services was only one of the 20 areas affected See Attachment

e Deborah Wessinger an Administrative Assistant at Watkins was bumped by Katherine Myers an Administrative Assistant in the Division of Education Her position was not eligible to be bumped by a teacher Ms Wessinger originally bumped into a vacant correctional officer slot at Walden Correctional Institution She was recalled to work in accordance with the RIF plan to an administrative assistant position in the office of State and Local Inspections

f Lynn Eaves is a non-certified Teacher Assistant at Tyger River and holds a classified state position (pay band 2), not an unclassified teacher position The Teacher Assistant position was not eliminated in Competitive Area 11, nor are unclassified certified teachers eligible to bump into this classified position

g The RIF in Fiscal Year 2002-03 was intended to permanently eliminate positions and to reduce overall payroll costs Similar to other state agencies, the Department of Corrections received additional budget cuts in Fiscal Year 2003-04 even after implementing a RIF the previous year The agency subsequently offered a plan to remaining staff to retire and return to work in their present position at a substantially lower salary – all without health insurance and other leave benefits This plan is one of several cost-cutting actions for the current Fiscal Year and maintains our lower staffing levels and further reduces cost

h The Department of Corrections has the right to make management decisions regarding the administration of resources This question does not pertain to the grievance issue before the Office of Human Resource

i Rose Ruger taught math at Manning Correctional Institution and held certification in both math and general academics. Ms Ruger bumped a math teacher at Camille Graham with less service This position has not been filled at this time due to current budget reductions It is the Department s position that it is not required to fill every vacant position

j All employees who were displaced by the RIF were offered vacant positions for which they met the minimum training and experience requirements in descending pay band and pay level order The Department has no information regarding any person being offered a position for which they were not qualified

k Jacqueline Venning, was a Guidance Counselor at Manning and is certified in Guidance, Special Education, and General Academics Ms Venning's position was eliminated and she bumped a less senior Guidance Counselor At this time Ms Venning continues to provide Guidance Counselor duties, as well as other additional educational services she is qualified to perform and are necessary due to budget reductions As stated in item (j) above, all employees subject to RIF were offered vacant positions in descending pay band and pay level order for which they met the minimum training & experience requirements

l Ricky Harrison s position was eliminated and he bumped into the position held by Mr Ken Kinney, a less senior employee in the Division of Industries print shop Mr Harrison met the established minimum qualifications for the position Mr Harrison has been reassigned to a position in Industries that needed to be filled and Mr Kinney has been recalled in accordance with RIF policy

m Education employees at Leath Correctional Institution were not targeted for RIF based upon the level of their educational degree The RIF competitive area for Leath, which is located in Greenwood, included the town of McCormick which is a reasonable driving distance and within the normal recruiting area for Greenwood

n Educators were not targeted in retaliation for a previous lawsuit filed against the agency Over 40 of the positions eliminated and 19 of the 20 areas identified under the RIF were from non-education areas

o Mr Sherl Akins was hired in March 2003 as a temporary grant employee Due to his temporary status, his position could not be bumped by a full-time employee who was subject to RIF

p Eartha Brooks, Inspector (Operational Review Manager) at Wateree River Correctional Institution, was subject to RIF and elected layoff Ms Brooks was not offered a Sergeant position because she did not meet the minimum qualifications for the position, but was offered a Correctional Officer position

q Maggie Williams was bumped by Mariam Myers, a more senior employee who met the minimum qualifications for the position All of the teachers retained meet the qualifications for the position they are holding There is no need for additional certification.

r The salary of the Director of the Department of Corrections is established by the state Agency Head Salary Commission The agency does not believe questions relating to the Director's residence pertain to the grievance issue before the Office of Human Resources, which is the manner in which the Reduction-In-Force was executed

s Ms Lakin, who was a certified teacher at Broad River Correctional Institution, bumped a less senior employee, and actually had RIF seniority over almost all other certified teachers

t The positions held by two vocational teachers and the Principal at Wateree River were eliminated by RIF The two vocational teacher positions eliminated were a vocational heavy equipment operator and a vocational heavy equipment mechanic and neither were eligible to bump a less senior employee The Principal position was held by Albertha Haynesworth who was not eligible to bump a Principal with more seniority at Turbeville Correctional Institution

u Hoyte Sharpe, continues to be responsible for a number of areas including coordinating vocational programs and grants The agency continues to have vocational programs to supervise at several institutions

In response to the August 29, 2003 request, I submit the following

A) & B) are requests that were directed to the State Office of Human Resources As such, these materials should be submitted by your office and not the Department of Corrections

Regarding C) & E) – J), it is the Department s position that the grievance currently pending before the State Office of Human Resources is limited to how the Department's Reduction in Force Plan and Policy were applied These requests regarding the Department's use and allocation of its resources exceed the scope of this grievance matter

Regarding D), this material has already been provided by the Department

I trust that this information satisfies your request Please contact me if you have any further questions regarding this matter

Sincerely,

Deborah Drucker Deutschmann
Deputy General Counsel

enclosure

cc W Allen Nickles III, Esquire

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO All Employees

FROM Jon E Ozmint

SUBJECT Reorganization and Agency Reduction-In-Force

DATE March 31, 2003

Over the last two and a half months, I have gained tremendous respect for the mission of the Department of Corrections and the fine employees who work here I have been to almost every location and seen our employees perform their jobs at admirable levels

Without question, the most difficult task I have ever faced is to operate this agency without adequate funding For two years, the agency has stretched its dollars farther than ever before Programs have continued without sufficient staff, often only because employees have set high standards to continue providing quality service

For two years, the agency has failed to operate within our allocated funding Again this year, the Budget & Control Board authorized us to operate with a deficit of nearly $28 million At the same time, however, I was advised that the agency must take immediate steps to operate within our budget for the next fiscal year Unfortunately, funding shortages now appear to be at least as bad next year

I have reviewed the organizational structure of the agency and determined that changes must be made to adjust to our level of funding and prepare for the future The organization that I have put in place should be equipped to handle the challenges that face us A general outline of the organizational change is listed at the end of this memorandum

One of the most difficult decision any leader must make is to eliminate the jobs of employees However, our agency has reached the point of financial crisis so that we must now have a Reduction-In-Force I have identified 148 positions in many areas throughout the agency to reduce staff, primarily in headquarters institutional non-security and support functions Employees in areas that will be affected include

Educational Services
Youthful Offender
Industries
Classification & Inmate Records
Inmate Drug Testing
Office of Communications
Human Resources
Training Academy
Coastal Office
Temporary & Temporary Grant
Inspections, Operational Review & Accreditation
Substance Abuse Services
Internal Audits
Executive Affairs
Human Services
Health Services & Behavioral Medicine
Resource & Information Management
Maintenance & Construction
Appalachian Office
Probationary Employees

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD, CHAIRMAN
GOVERNOR

GRADY L. PATTERSON, JR.
STATE TREASURER

RICHARD ECKSTROM
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CHAIRMAN, SENATE FINANCE COMMITTEE

ROBERT W. HARRELL, JR.
CHAIRMAN, WAYS AND MEANS COMMITTEE

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SAMUEL L. WILKINS
DIRECTOR

October 9, 2003

Mr W Allen Nickles III
Gergel, Nickles & Solomon P A
Attorneys at Law
Post Office Box 1866
Columbia South Carolina 29202-1866

Dear Mr Nickles

This letter is in response to your August 29, 2003 letter requesting information from Mr Terry Baggott regarding the South Carolina Department of Corrections (SCDC) reduction in force effective June 1 2003 I serve as a consultant with the Office of Human Resources (OHR) for SCDC, therefore, Mr Baggott has forwarded to me your request for this information

In a letter dated October 1, 2003, responding to your request Ms Deborah Drucker Deutschmann, Deputy General Counsel for SCDC has indicated that this office should provide you with the requested information directed to the Office of Human Resources (OHR) Specifically, Ms Deutschmann indicates in her letter that OHR should provide you with A) a complete copy of materials submitted by the Department of Corrections in support of its reduction in force implemented effective June 1 2003, and B) a complete copy of all materials provided to the Department of Corrections by the Office of Human Resources in reference to the reduction in force Accordingly, please find the enclosed information that you requested in items A) and B) of your August 29, 2003 letter

In addition, Ms Deutschmann contends in her letter that the other information, items C) and E) through J), requested in your August 29 2003 letter exceed[s] the scope of this grievance matter and "the grievance currently pending before the State Office of Human Resources is limited to how the Department s Reduction in Force Plan and Policy were applied Also Ms Deutschmann contends in her letter that item D has already been provided by the Department Please respond to Ms Deutschmann s contentions regarding this information by October 16, 2003

FAX (803) 737 0968

If you have any questions please do not hesitate to give me a call at 737-0952

Sincerely

Chris Poore
HR Consultant

Enclosures

c Ms Deborah Drucker Deutschmann (with enclosures)

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Facsimile (803) 256 1816
office@gnslaw com

October 14 2003

Via Facsimile (737-0968)
Mr Chris Poore
H R. Consultant
Office of Human Resources
1201 Main Street, Suite 1000
Columbia South Carolina 29201

RE Palmetto Unified School District RIF

Dear Mr Poore

We are in receipt of your letter dated October 9, 2003 with enclosures We respectfully disagree with the Department of Corrections' contention that the information requested 'exceed[s] the scope of this grievance matter The requested information delineated in our August 29, 2003 letter is pertinent to our assertion that individuals and/or positions were arbitrarily protected or removed from consideration for separation for reasons unrelated to the RIF criteria.' The information requested specifically addresses those documents that indicate the movement of personnel immediately prior to the notification that a reduction in force plan would be implemented on June 1, 2003 The requested information also addresses those persons who were either offered retirement incentives or other accommodations both during and after the RIF implementation The timing of the personnel movement along with the revision of the SCDC reduction in force policy in close proximity to the approval of the reduction in force plan also makes these documents pertinent to our grievance

At the request of the Office of Human Resources we provided several examples which illustrate circumvention of RIF procedures by the SCDC The requested information will upon information and belief, provide more and specific evidence of these violations The Department s reluctance to provide requested documentation as well as its direct response that the Department may manage itself without explanation or question is of grave concern The South Carolina Department of Corrections' administration apparently does not adhere to the State's requirement that government action must be open to the public it serves

Those items enumerated in our August 29th letter directly speak to the grievants assertion that there were individuals or positions arbitrarily protected or removed from consideration both

prior to and after the implementation of the RIF Accordingly, we renew our request for the information

Sincerely

Dona L Guffey

DLG/pfb
File #03-156
cc Ms Deborah Drucker Deutschmann (via facsimile & U S Mail)

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

November 10, 2003

Mr Chris Poore
Human Resources Consultant
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

Re James Bell, Othella Bernard, Katherina Bowyer; Linda Bratton, Ann Bridges, Rance Cobb, Jeannie Croxton Bernetha Culbreath, William Dreyer; Jacqueline Farr Ruth Fritts Nancy Glenn Etta Jane Jones Geneva Martin, Mary McCabe, Beverly McClanahan Max Randolph Carolyn Smith Maggie Williams and Paula Woodlief v S C Department of Corrections

Dear Mr Poore

The following is in response to your October 21 request for me to state the Department s position regarding Ms Guffey's October 14 2003 letter

The Department believes that adequate information has been provided to demonstrate that the Department complied with its Reduction in Force policy and plan It is the Department's position that materials requested by the appellants' attorneys are not relevant in order for the State Human Resources Director to determine that there is no material issue of fact concerning an improper or inconsistent application of the Reduction in Force policy or plan The Department fully answered all of the questions regarding how the RIF policy and plan was applied and answered all questions regarding management decisions in the functional area, educational programs where all of these appellants worked

The Department does not believe that a ruling has been made regarding the relevancy issue raised and, in the event the Department receives a ruling that the materials that the Department has objected to are deemed relevant, the Department will comply with such a directive The Department is not attempting to conduct business improperly as Ms Guffey implies, but is objecting to information requested that is outside the scope of review in this matter

Sincerely,

Deborah Drucker Deutschmann
Deputy General Counsel

cc Dona L Guffey Esquire

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February 2, 2004

Via Facsimile (737-0968) & U S Mail
Sam Wilkins, Esquire
Director, State Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia South Carolina 29201

RE **James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K. Dreyer; Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie L Williams, Paula Woodlief**

Dear Sam

As you are aware this firm represents the above named individuals who were separated from employment as educators with Palmetto Unified School District No 1 effective June 1 2003 as a result of a reduction in force implemented by the South Carolina Department of Corrections By letter dated January 9 2004 you indicated that the issues raised by these individuals do not constitute a grievance or an appeal" subject to review by the State Employee Grievance Committee This correspondence constitutes a request for reconsideration of this decision It is my understanding based upon communication from Ms Debbie Clark of your staff and the South Carolina Administrative Procedures Act that this request for reconsideration tolls the period for any petition for judicial review arising out of the decision contained in your letter of January 9, 2004

This request for reconsideration is based upon the following factors

1 The South Carolina Constitution in Article I § 22 provides in part, that ' No person shall be bound by a judicial or quasi judicial decision of an administrative agency affecting private rights except on due notice and opportunity to be heard "

2 The decision of January 9, 2004 was taken without affording the individuals affected an opportunity to present sworn testimony or to cross-examine parties responsible for terminating their employment

3 Throughout the administrative process, SCDOC refused or failed to provide the individuals affected by the reduction in force access to information relevant to their claims This information includes but is not limited to, the Department's refusal to provide documents that indicate the movement of personnel immediately prior to notification of the reduction in force, and information relating to retirement incentives or other accommodations offered both during and after the reduction in force

4 Neither the SCDOC nor the January 9, 2004 letter provide any legal justification for the violation of law in the reduction in force by failure to treat educators employed in the District in a unified fashion Instead, the SCDOC arbitrarily divided the legislatively established special statewide unified school district into geographic regions which resulted in the inability of educators to compete for positions based upon their service and qualifications

5 Neither the SCDOC nor the January 9 2004 letter offer any justification for the elimination of educational programs to inmates and severely restricting access to the availability of educational programs in a manner which is contrary to the expressed public policy of this State (See, State of the State Address Governor Mark Sanford, January 21, 2004 wherein the Governor 'instructed the Director of SCDOC to make participation in education programs mandatory for appropriate inmates and to deprive privileges to inmates who do not participate in educational programs The Governor stated 'it is crazy to continue sending folks out of a criminal justice system with no better educational leg to stand on and expect good results.)

6 In denying the affected individuals an opportunity to be heard the January 9, 2004 letter shields the SCDOC Director from examination regarding comments that educators employed by the Department were disloyal in enforcing their rights to lawful compensation It is respectfully submitted that both the circumstances surrounding the reduction in force, exemptions to the reduction in force and the Director's comments will demonstrate to the Grievance Committee that the Department ignored the unified standing of the District in order to separate senior educators from employment

7 The contention that administrative policy allows the Agency Director or designee to take actions in reduction in force without the involvement of the District's Board is contrary to law which assigns primary responsibility for the administrative functions of the District, including determining the physical facilities needed to carry out all educational programs to the Board and which delegates to the Director the limited role of "consent and concurrence' S C Code Ann § 25-24-70 Clearly any administrative policy contrary to law is void and any action pursuant to such a policy is *ultra vires*

For the reasons outlined above each of the affected individuals request that the decision contained in your letter of January 9 2004 be reconsidered and that a hearing be scheduled on all issues raised in the grievances presented to your Agency Should you have any questions concerning this matter, please contact me

Sincerely,

W Allen Nickles, III

WAN/pfb
cc Ms Robin M Gracien
File #03-156

****
*** TX REPORT ***
****

TRANSMISSION OK

TX/RX NO	1487	
CONNECTION TEL		7370968
SUBADDRESS		
CONNECTION ID		
ST TIME	02/02 14 51	
USAGE T	01 07	
PGS SENT	3	
RESULT	OK	

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February 2 2004

Via Facsimile (737-0968) & U S Mail
Sam Wilkins Esquire
Director, State Office of Human Resources
Grievance and Mediation Services
1201 Main Street Suite 1000
Columbia, South Carolina 29201

RE **James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K. Dreyer; Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M. Martin, Mary H. McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie L Williams, Paula Woodlief**

Dear Sam

As you are aware, this firm represents the above named individuals who were separated from employment as educators with Palmetto Unified School District No 1 effective June 1 2003 as a result of a reduction in force implemented by the South Carolina Department of Corrections By letter dated January 9, 2004, you indicated that the issues raised by these individuals do not constitute a grievance or an appeal" subject to review by the State Employee Grievance Committee This correspondence constitutes a request for reconsideration of this decision. It is my understanding based upon communication from Ms Debbie Clark of your staff and the South Carolina Administrative Procedures Act that this request for reconsideration tolls the period for any petition for judicial review arising out of the decision contained in your letter of January 9, 2004

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

February 25, 2004

Ms Deborah Clark
Grievance and Mediation Services Program Coordinator
Office of Human Resources
1201 Main Street, Suite 1000
Columbia South Carolina 29201

Re James Bell Othella Bernard Katherina Bowyer Linda Bratton Ann Bridges, Rance Cobb Jeannie Croxton, Bernetha Culbreath, William Dreyer, Jacqueline Farr; Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva Martin, Mary McCabe, Beverly McClanahan, Max Randolph, Carolyn Smith Maggie Williams and Paula Woodlief v S C Department of Corrections

Dear Ms Clark

The following information is provided in response to your February 24, 2004 facsimile and request for me to respond to the February 2, 2004 reconsideration request submitted by Mr Nickles on behalf of the above named individuals

It is the Department s position that the State Human Resources Director properly determined that these cases do not contain issues that are grievable before the State Employee Grievance Committee The jurisdiction of the State Employee Grievance Committee is limited regarding reductions in force See S C Code Ann § 8-17-330 and S C H R Reg 19-718 04(A) The Department contends that it properly and consistently applied its Reduction in Force policy and plan to each of these individuals

The Department believes that the February 2, 2004 letter does not raise any information that has not been previously raised regarding the issue of whether the Department had improperly or inconsistently applied its Reduction in Force policy or plan that would justify the granting of this request for reconsideration

Further, it is the Department s position that it has not refused or failed to provide information regarding this matter As I indicated on November 10, 2003, the Department believes that it has submitted all relevant information regarding the application of this Reduction in Force policy and plan All other materials requested during the course of this appeal, by the attorneys for the above named individuals, are not relevant for the determination of whether there exists a material issue of fact regarding the application of the Reduction in Force policy or plan

Additionally, the Department maintains that it complied with South Carolina Code of Laws Section 24-25-90 and its Reduction in Force policy when it developed its Reduction in Force plan

PO Box 21787 4444 Broad River Road Columbia, SC 29221 1787 Telephone (803) 896-8555

The Department made difficult decisions regarding the use of its financial resources and determined that positions in many areas including educational services would have to be eliminated in order to meet its financial obligations as outlined by the South Carolina legislature

Governor Sanford s January 21, 2004 State of the State Address, in which he outlined a plan for educating inmates, cannot be a basis for reconsidering the Reduction in Force plan that was effective on June 1, 2003 Governor Sanford's "instructions" had not been given to Director Jon Ozmint at the time that the Reduction in Force plan at issue was developed Further, Governor Sanford also requested in this Address that $2 5 million dollars be given to the Department to fund this initiative If the Department does receive this money it will make hiring decisions in accordance with the recall rights in its Reduction in Force policy and plan

Finally, I apologize for any confusion regarding the Department s Response to this Request for Reconsideration However, I would like to point out that in correspondence dated September 11, 2003, I clarified that all correspondence relating to these appeals should be sent to my attention at the Department of Corrections

Please contact me if you have any further questions regarding this matter

Sincerely

Deborah Drucker Deutschmann
Deputy General Counsel

cc W Allen Nickles III Esquire
Gergel Nickles & Solomon, P A
Post Office Box 1866
Columbia, South Carolina 29202-1866

STATE OF SOUTH CAROLINA

State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
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SAMUEL L WILKINS
DIRECTOR

March 22, 2004

CERTIFIED MAIL
Mr W Allen Nickles III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re James Bell Othella Bernard Katherina Bowyer Linda Bratton Ann Bridges Rance Cobb Jeannie Croxton Bernetha Culbreath, William Dreyer Jacqueline Farr Ruth Fritts Nancy Glenn Etta Jane Jones Geneva Martin Mary McCabe Beverly McClanahan Max Randolph Carolyn Smith Maggie Williams and Paula Woodliefv S C Department of Corrections (SCDC)

Dear Mr Nickles

The State Human Resources Director has received your request for reconsideration, on behalf of the above referenced appellants dated February 2 2004 and SCDC s response dated February 25 2004, to your request for reconsideration Based upon a review of your request and SCDC s response it has been determined that the request should be denied

Section 19-718 05 (E) of the State Human Resources Regulations states If the State Human Resources Director determines that the appeal is untimely or fails to comply with the requirements of the Act he will notify the covered employee or his representative that the appeal is denied and no further action will be taken concerning the appeal As a result of the State Human Resources Director s decision the covered employee may request reconsideration within 30 calendar days from notification of the decision

In your letter of February 2 2004 you contend the following

1) the South Carolina Constitution in Article I § 22 provides in part, that No person shall be bound by a judicial or quasi judicial decision of an administrative agency affecting private rights except on due notice and opportunity to be heard
2) the decision of the State Human Resources Director on January 9 2004, was taken without affording the individuals affected an opportunity to present sworn testimony or to cross-examine parties responsible for terminating their employment
3) throughout the administrative process SCDC refused or failed to provide the individuals affected by the reduction in force (RIF) access to information relevant to their claims This information includes but is not limited to the Department s refusal to provide documents that indicate the movement of personnel immediately prior to notification of the RIF and information relating to retirement incentives or other accommodations offered both during and after the RIF

4) neither SCDC nor the January 9 2004 letter provide any legal justification for the violation of law in the RIF by failure to treat educators employed in the District in a "unified fashion Instead SCDC arbitrarily divided the legislatively established "special statewide unified school district into geographic regions which resulted in the inability of educators to compete for positions based upon their service and qualifications,
5) neither SCDC nor the January 9, 2004 letter offer any justification for the elimination of educational programs to inmates and severely restricting access to the availability of educational programs in a manner which is contrary to the expressed public policy of the State Governor Mark Sanford s State of the State Address on January 21, 2004 instructed" the Director of SCDC to make participation in education programs mandatory for appropriate inmates and to deprive privileges to inmates who do not participate in educational programs The Governor states it is crazy to continue sending folks out of a criminal justice system with no better educational leg to stand on and expect good results
6) in denying the affected individuals an opportunity to be heard the January 9 2004 letter shields the SCDC Director from examination regarding comments that educators employed by the Department were disloyal in enforcing their rights to lawful compensation It is respectfully submitted that both the circumstances surrounding the RIF exemptions to the RIF and the Director s comments will demonstrate to the Grievance Committee that SCDC ignored the unified standing of the District in order to separate senior educators from employment and
7) the contention that administrative policy allows SCDC s Director or designee to take actions in a RIF without the involvement of the District s Board is contrary to law which assigns primary responsibility for the administrative functions of the District including determining the physical facilities needed to carry out all educational programs to the District s Board and which delegates to SCDC s Director the limited role of consent and concurrence S C Code Ann §25-24-70 [sic] Clearly, any administrative policy contrary to law is void and any action pursuant to such a policy is *ultra vires*

In SCDC s response letter of February 25, 2004, it contends the following
1) these cases do not contain issues that are grievable before the State Employee Grievance Committee,
2) the jurisdiction of the State Employee Grievance Committee is limited regarding a RIF (S C Code Ann §8-17-330 and State Human Resources Regulations 19-718 04(A)
3) the February 2 2004 request for reconsideration letter does not raise any information that has not been previously raised as to whether SCDC improperly or inconsistently applied its RIF policy or plan
4) it has not refused or failed to provide information regarding this matter rather it has submitted all relevant information regarding the application of the RIF policy and plan,
5) all other materials requested by the attorneys representing the individuals in the above referenced appeals are not relevant for the determination of whether there exists a material issue of fact regarding the application of the RIF policy or plan
6) it complied with S C Code of Laws §24-25-90 and its RIF policy when it developed its RIF plan
7) it made difficult decisions regarding the use of financial resources and determined that positions in many areas including educational services would have to be eliminated in order to meet its financial obligations

8) Governor Sanford s State of the State Address in which he outlined a plan for educating inmates, cannot be a basis for reconsidering the RIF plan that was effective June 1 2003 Governor Sanford s instructions had not been given to SCDC s Director Jon Ozmint at the time that the RIF plan at issue was developed, and
9) Governor Sanford also requested in this Address that $2.5 million dollars be given to SCDC to fund this initiative If SCDC receives this money it will make hiring decisions in accordance with the recall rights in its RIF policy and plan.

As to your first contention regarding the provisions of Article I §22 of the State Constitution each of the individuals in the above referenced appeals was provided an opportunity to raise a material issue of fact concerning SCDC s inconsistent or improper application of its RIF policy or plan Section 8-17-330 states in part that [a] reduction in force is an adverse employment action considered as a grievance only if the agency, or an appeal if the State Human Resources Director determines that there is a material issue of fact that the agency inconsistently or improperly applied its reduction in force policy or plan " Section 8-17-330 also states in part [a] covered employee has the right to appeal to the State Human Resources Director an adverse employment action involving the issues specified in this section Based on the information provided by each of these individuals they failed to establish that a material issue of fact existed concerning the impropriety or inconsistency of the RIF policy or plan Consequently these individuals were given notice and opportunity to be heard concerning the threshold issue of subject matter jurisdiction which was initially before me for decision Because they did not establish that the Committee has subject matter jurisdiction they were not entitled to any additional due process

As to your second contention §8-17-350 states in part that 'the State Human Resources Director shall determine whether or not the action is grievable to the committee or a mediator-arbitrator ' Since the issues raised were not considered to be appealable, the appeals were not forwarded to the State Employee Grievance Committee for a hearing Any cross-examination or sworn testimony would not be appropriate in determining jurisdictional requirements and would only be allowed during a hearing before the Committee

Regarding your third contention these individuals failed to demonstrate that the information they contend SCDC refused or failed to provide is relevant to their argument that SCDC improperly or inconsistently applied its RIF policy or plan Therefore this contention lacks merit

As to your fourth contention the Agency Director or designee is authorized in accordance with SCDC s RIF policy "to approve any position(s) to be abolished and to approve the competitive area " Also, SCDC s RIF policy provides that 'the competitive area may be ***agency wide, a*** department, or a more restricted ***geographical*** area where the staff is separately organized and clearly distinguishable from the staff in other areas [Emphasis in original] ' In addition SCDC s RIF policy defines competitive area as a common geographical or organizational area in which employees will be considered for reduction-in-force procedures including transfers, reassignments and/or bumping which is determined and approved by the Agency Director " The Agency Director or his designee therefore has the discretion of developing the RIF plan and defining the competitive area In addition SCDC s RIF policy allows for the competitive area to be defined as a specific geographical area Section 24-25-90 of the S C Code of Laws states "The superintendent of the district and all other educational personnel shall be employed, supervised and terminated according to the South Carolina Department of Corrections personnel policies and procedures In accordance with SCDC s RIF policy the competitive areas were defined in specific geographical areas

around the state and included both educator and non educator positions Any competition for positions would occur within the competitive area since SCDC s RIF policy does not provide for competition outside of the competitive area Nothing in the cited statute nor SCDC s RIF policy requires that these educators be treated in a unified fashion

In your fifth contention you argue that neither SCDC nor my January 9 2004 letter offer any justification for the elimination of educational programs to inmates The reason provided by SCDC in its June 2003 RIF plan and stated in my January 9, 2004 letter indicates the need to eliminate both educational and non-educational positions because of budgetary reasons In addition in your fifth contention you cite Governor Sanford s State of the State Address in which he mentions the educational programs of SCDC inmates The Governor s State of the State Address occurred twelve days after my January 9, 2004 letter and approximately eight months after the effective date of the RIF You have failed to demonstrate a nexus between the State of the State Address and the improper or inconsistent application of SCDC s RIF policy or plan

As to your sixth contention you have also failed to demonstrate a nexus between any comments made by SCDC s Director and the improper or inconsistent application of SCDC s RIF policy or plan

Concerning your seventh contention, while §24 25-70 of the Code of Laws authorizes the school board, with the consent and concurrence of the Director of the Department of Corrections to perform administrative functions for the Palmetto Unified School District this statute must also be read together with §24 25-90 In reading both of these sections together employees of the Palmetto Unified School District are also subject to SCDC s personnel policies and procedures specifically with regard to termination As provided in SCDC s RIF policy, the Agency Director has the ability to determine when and how to eliminate positions

In our sole determination of whether or not subject matter jurisdiction exists for these appeals the allegations you have presented do not raise a material issue of fact concerning the improper or inconsistent application of SCDC s RIF policy or plan While the information contained in your letter of February 2, 2004 has been reviewed I uphold my final decision of January 9 2004 on the above referenced appeals

Sincerely,

Samuel L. Wilkins

Samuel L Wilkins
Director

c Mr Jon Ozmint
Ms Deborah Drucker Deutschmann

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
	C/A NO 04-CP-40-1761
James "Cal" Bell, Othella Bernard,)	
Katherina Bower, Linda M W Bratton,)	
Ann T Bridges, Rance C Cobb, Jeannie)	
B Croxton, Bernetha L Culbreath,)	
William K. Dreyer, Jacqueline D Farr,)	
Ruth Fritts, Nancy Glenn, Etta Jane)	
Jones, Geneva M. Martin, Mary H)	
McCabe, Beverly McClanahan, Max)	
D Randolph, Carolyn McIver Smith,)	
Maggie G Williams and Paula Woodlief,)	
)	
Plaintiffs,)	
)	
vs)	PLAINTIFFS' FIRST SET OF
)	INTERROGATORIES AND REQUEST
South Carolina Department of)	FOR THE PRODUCTION OF
Corrections and Palmetto Unified)	DOCUMENTS
School District No 1,)	
)	
Defendants)	

TO THE ABOVE-NAMED DEFENDANTS AND THEIR ATTORNEYS, HORGER, HORGER & JUSTICE, L C C

Plaintiffs hereby propound the following Interrogatories and Request for Production of Documents, pursuant to Rules 33 and 34 of the South Carolina Rules of Civil Procedure, and demand responses/production within thirty days hereof For purposes of this first set of interrogatories and request for production of documents, the terms shall be used

1 The term "records" shall include

Any written, printed, recorded, typed, digital, or graphic material however produced or reproduced including any non-identical copies thereof, and further includes but is not limited to any books, ledgers, letters, memoranda, advertisements, proposals, telegrams, reports, telephone logs, facsimile transmissions, drafts bills checks invoices, tapes, transcripts, photographs, photo records, computer records and other data compilations from which information can be obtained

which are in the possession, custody or control of Defendant or Defendant's attorney

2 The term "identify" when used herein in connection with natural persons means to state their full name, title, and job description, if applicable, their present business and residence addresses (this term applies to all individuals) and phone numbers,

The term "identify" when used in connection with business entities means to state the business name, present address and phone number of each said entity

When a request asks for a description of or identification of a document, the answer should be given in sufficient detail to enable a person or party to whom a subpoena or request to produce documents is directed to locate and identify fully the documents sought to be produced and to enable counsel for the Plaintiff to determine that such documents, when produced, are in fact the documents so described

3 The term 'reduction in force ' shall mean the action undertaken by the Department of Corrections which resulted in the separation of Plaintiffs' employment

INTERROGATORIES AND REQUESTS FOR PRODUCTION

1 Provide a complete list of all positions occupied at the South Carolina Department of Corrections prior to the reduction in force

2 Provide a complete list of all positions eliminated as a result of the reduction in force

3 Provide a complete list of all vacancies existing immediately prior to the reduction in force

4 Provide a complete list of all vacancies filled since the reduction in force

5 Provide a complete list of all new positions approved since the reduction in force

6 Provide a complete copy of materials submitted by the Department of Corrections in support of any retirement incentives offered during the calendar years 2002, 2003 and 2004

7 Provide a complete list of positions approved for the Department of Corrections for the calendar years 2002, 2003 and 2004

8 Provide a complete list of all reclassifications and promotions and transfers implemented by the Department of Corrections during the calendar years 2002, 2003 and 2004

9 Provide a copy of the Palmetto Unified School District budget for the fiscal years 2001-2002, 2002-2003 and 2003-2004

10 Provide a complete list of all employees indicating position and hire date, assigned responsibilities that were performed by certified educators prior to the reduction in force

11 Provide a complete list of all employees affected by the reduction in force through reclassification, bumping or otherwise who have had their salary reinstated to pre-reduction in force levels

12 Provide a complete list of all employees rehired or recalled following the reduction in force

GERGEL, NICKLES & SOLOMON, P A

By _____
W Allen Nickles, III
Dona L. Guffey
1519 Richland Street
Post Office Box 1866
Columbia, South Carolina 29202-1866
(803) 779-8080

Attorneys for Plaintiffs

June 15, 2004
Columbia, South Carolina

CERTIFICATE OF SERVICE

I, Paula Bregovi, the undersigned employee of Gergel, Nickles & Solomon, P A , attorneys for the Plaintiff, hereby certify that I have served the foregoing Plaintiff's First Set of Interrogatories and Requests for Production of Documents, by depositing a copy of same in the United States Mail, postage prepaid and addressed as follows

Scott T Justice Esquire
Horger, Horger & Justice L L C
Post Office Box 518
Orangeburg, South Carolina 29116

This 8th day of June, 2004

Paula Bregovi

Paula Bregovi

Columbia South Carolina

HORGER, HORGER & JUSTICE, LLC

Michael P Hörger *
Scott T Justice

Kathryn R Britt

Certified Circuit Court
Arbitrator And Mediator

160 Centre Street, NE
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William A Horger
(1922 1998)

Writer's E mail
kbritt@sc rr com

August 23 2004

Dona L Guffey
Gergel Nickles & Soloman, P A
P O Box 1866
Columbia SC 29202-1866

Re James "Call ' Bell, *et al* v South Carolina Department of Corrections and Palmetto Unified School District No 1
Civil Action No 04-CP-40-1761

Dear Ms Guffey

We are in receipt of your letter dated August 13 2004, in which you state that you have not received Defendants responses to Plaintiffs' discovery requests which were originally served on or about June 15, 2004 In that letter you also indicated that if Defendants did not respond to Plaintiffs discovery you would file the proposed Motion to Compel or in the alternative Motion for Discovery First, I apologize for my tardiness in responding to your discovery and your letters However for the reasons below, Defendants will not respond to Plaintiffs' discovery requests

Plaintiffs' interrogatories and production requests to Defendants are improper, as this matter is only a petition for judicial review of the Department of Corrections' decision regarding the reductions in force Unlike other general litigation in which interrogatories and production requests can be freely exchanged between the parties Defendants are under no obligation or requirement pursuant to the South Carolina Rules of Civil Procedure to answer Plaintiffs' discovery requests Therefore Plaintiffs' discovery requests are inappropriate, and accordingly Plaintiffs' Motion to Compel is without merit

Plaintiffs proposed Motion for Discovery pursuant to S C Code Ann § 1-23-380(f) is also improper First, the South Carolina Code does not contain Section 1-23-380(f) Therefore I have to assume your letter contains a typographical error which is perfectly understandable but leaves me guessing somewhat as to the basis of your motion Further in your proposed Motion, you state that Plaintiffs request for discovery is submitted in order to provide the Court with a full and adequate record from which to rule on Defendants' alleged irregularities in the administration of the reductions in force citing *Ross v Medical University of South Carolina*, 453 S E 2d 880 (S C 1995)

I have reviewed the Ross case and I do not believe the current circumstances warrant discovery when compared to the standards discussed in Ross

Therefore, Defendants will not respond to Plaintiffs' discovery requests Defendants ask that Plaintiffs do not file their proposed Motion in its current form as Defendants believe it is without basis and may seek costs and fees for having to defend the motion If however, you believe that there is a way in which the parties can reach some compromise on these issues without the court s intervention, please do not hesitate to contact us

Very truly yours,

Scott T Justice

STJ/gme

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT C/A NO 04-CP-40-1761
James "Cal" Bell, Othella Bernard, Katherina Bower, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L. Culbreath, William K. Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief, Plaintiffs, vs South Carolina Department of Corrections and Palmetto Unified School District No 1, Defendants	MOTION TO COMPEL OR IN THE ALTERNATIVE MOTION FOR DISCOVERY

Pursuant to Rule 37(a) of the South Carolina Rules of Civil Procedure Plaintiffs move to compel the Defendants to respond to Plaintiffs First Set of Interrogatories Requests for Production of Documents dated June 15, 2004 It is respectfully submitted that the discovery requests identified below address information relevant to the claims and defenses in this action Plaintiffs have requested that Defendants provide a response to these discovery requests To date Defendants have provided no response

In the alternative, Plaintiffs request that this Court order the Defendants to provide responses to discovery pursuant to S C Code Ann § 1-23-380(5) This request is submitted in order to provide the Court a full and adequate record from which to rule regarding the Defendants' irregularities in

the administration of the reduction in force resulting in Plaintiffs reassignments, demotions and separations from employment See, Ross v Medical University of South Carolina, 317 S C 377 453 S E 2d 880 (1995)(Circuit Court has jurisdiction to order discovery on appeal from an administrative decision)

A copy of the above discovery requests are attached hereto

GERGEL, NICKLES & SOLOMON P.A

By _____

W Allen Nickles, III
Dona L Guffey
1519 Richland Street
Post Office Box 1866
Columbia, South Carolina 29202-1866
(803) 779-8080

Attorneys for Plaintiffs

_____ 2004
Columbia, South Carolina

CERTIFICATE OF SERVICE

I, Paula Bregovi the undersigned employee of Gergel Nickles & Solomon, P A attorneys for the Plaintiff, hereby certify that I have served the foregoing Motion to Compel, by depositing a copy of same in the United States Mail, postage prepaid and addressed as follows

Scott T Justice, Esquire
Horger, Horger & Justice, L L C
Post Office Box 518
Orangeburg, South Carolina 29116

This ___ day of August, 2004

Paula Bregovi

Columbia South Carolina

GERGEL, NICKLES & SOLOMON, P.A.
ATTORNEYS AT LAW
Post Office Box 1866
Columbia, South Carolina 29202-1866

Richard Mark Gergel
W. Allen Nickles, III
Carl L. Solomon
David E. Rothstein
Dona L. Guffey
Dwayne T. Mazyck

1519 Richland Street
Telephone (803) 779-8080
Facsimile (803) 256-1816
off ce@gnslaw.com

August 30, 2004

Scott T. Justice, Esquire
Horger, Horger & Justice, L.L.C.
Post Office Box 518
Orangeburg, South Carolina 29116

RE James "Call" Bell, et al. v. SC Department of Corrections and Palmetto Unified School District No. 1
Civil Action No. 04-CP-40-1761

Dear Mr. Justice:

I am in receipt of your letter dated August 23, 2004 wherein you indicated an interest in exploring a way in which the parties could reach some compromise regarding the requested information without the Court's intervention. It is our position that all of the requested information in the interrogatories and request for production are available pursuant to the Rules of Civil Procedure and the Administrative Procedures Act. See, S.C. Code Ann. § 1-23-380(5). Furthermore the information requested is within the scope of discovery addressed in Ross v. Medical University of South Carolina, 317 S.C. 377, 453 S.E.2d 880 (1995).

The discovery requests which have been provided also seek documents which are available for public inspection under the South Carolina Freedom of Information Act, S.C. Code § 30-4-10 et seq. Accordingly, in an effort to resolve this matter without unnecessary judicial intervention, I am submitting the following requests for information under the FOIA. Please designate any costs anticipated in the production of these documents and make such materials available for inspection and reproduction within fifteen days as provided by statute. We will withhold filing the Motion to Compel pending response to this request.

The information requested is as follows:

1. A complete list of all positions occupied at the South Carolina Department of Corrections prior to the reduction in force effective June 1, 2003.

2. A complete list of all vacancies existing immediately prior to the reduction in force

3 A complete list of all new positions approved since the reduction in force

4 A complete list of all reclassifications and promotions and transfers implemented by the Department of Corrections during the calendar years 2002, 2003 and 2004

5 A complete list of all employees, indicating position and hire date, assigned responsibilities that were performed by certified educators prior to the reduction in force

6 A complete list of all employees affected by the reduction in force through reclassification, bumping or otherwise who have had their salary reinstated to pre-reduction in force levels

7 A complete list of all employees rehired or recalled following the reduction in force

This request is submitted to you in your capacity as legal representative of the Department of Corrections in the above matter If, for any reason, you are not authorized to respond to this request, please designate the appropriate agent for purposes of service

I look forward to hearing from you

Sincerely

Dona L Guffey

DLG/pfb
File #03-156

HORGER, HORGER & JUSTICE, LLC

Michael P Horger *
Scott T Justice

Kathryn R Britt

Certified Circuit Court
Arbitrator And Mediator

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William A Horger
(1922 1998)

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September 8, 2004

Dona L Guffey
Gergel, Nickles & Soloman P A
P O Box 1866
Columbia, SC 29202-1866

Re James Call" Bell, *et al* v South Carolina Department of Corrections and Palmetto Unified School District No 1
Civil Action No 04 CP-40-1761

Dear Ms Guffey

We are in receipt of your response letter dated August 30, 2004 regarding the above referenced case on a proposed compromise regarding Plaintiffs request for information We continue to disagree with your clients position that the requested information is available pursuant to the Rules of Civil Procedure or the Administrative Procedures Act. If however your clients believe that the information they desire is available for public inspection pursuant to the South Carolina Freedom of Information Act, we recommend that they request that information directly from SCDC Plaintiffs FOIA request is not properly served upon us, but should be directed to Bob Petersen, Esq , of the Office of General Counsel, at SCDC

Please note that we are not agreeing with Plaintiffs that the information they have requested is subject to FOIA simply by informing them to send the FOIA request to Mr Petersen Rather once Plaintiffs properly submit a FOIA request, the appropriate SCDC officials will make the determination of whether or not the information requested is subject to FOIA

Moreover even if they obtain the desired information through FOIA Plaintiffs must still persuade the Court that this information should be included in the record for the Court s administrative review Defendants believe that the record before the Court is accurate and complete and will oppose any attempts by Plaintiffs to present additional evidence before the Court

If you have any questions regarding this matter please do not hesitate to contact us

With kindest regards, I am

Yours very truly,

Kathryn R Britt

KRB/gme

GERGEL, NICKLES & SOLOMON, P A
ATTORNEYS AT LAW
Post Office Box 1866
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Richard Mark Cergel
W Allen Nickles III
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September 10, 2004

Bob Petersen, Esquire
Office of General Counsel
SC Department of Corrections
4444 Broad River Road
Columbia, South Carolina 29210

RE FOIA Request
James "Cal" Bell, et al v SC Department of Corrections
Civil Action File No 04-CP-40-1761

Dear Mr Petersen

Pursuant to the South Carolina Freedom of Information Act, S C Code § 30-4-10 et seq , I am submitting the following request for information Please designate any costs anticipated in the production of these documents and make such materials available for inspection and reproduction within fifteen days as provided by statute

The information requested is as follows

1 A complete list of all positions occupied at the South Carolina Department of Corrections prior to the reduction in force effective June 1, 2003

2 A complete list of all vacancies existing immediately prior to the reduction in force

3 A complete list of all new positions approved since the reduction in force

4 A complete list of all reclassifications and promotions and transfers implemented by the Department of Corrections during the calendar years 2002, 2003 and 2004

5 A complete list of all employees, indicating position and hire date assigned responsibilities that were performed by certified educators prior to the reduction in force

6 A complete list of all employees affected by the reduction in force through reclassification, bumping or otherwise who have had their salary reinstated to pre-reduction in force levels

7 A complete list of all employees rehired or recalled following the reduction in force

I appreciate your cooperation in this matter If you have any questions pertaining to this request, please contact this office I look forward to hearing from you.

Sincerely

Dona L Guffey

DLG/pfb
File #03-156

South Carolina Department of Corrections

MARK SANFORD Governor
JON E. OZMINT Director

October 6, 2004

Dona L Guffey, Esquire
Gergel Nickles & Solomon P A
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re FOIA Request
James Cal Bell, et al V SC Department of Corrections
Civil Action File No 04 CP-40-1761

Dear Ms Guffey

This letter is written in response to your Freedom of Information Act request pursuant to South Carolina Code of Laws Section 30-4 30(c) This morning I received information from our Human Resources Office in response to your request for information that was received by the Department on September 15 2004 Upon reviewing the information that I received from the Human Resources Office however I must alert you that some material will be redacted or reconfigured as it appears to contain information that is exempt from disclosure pursuant to Section 30-4-40 Unfortunately, the person that provided the information to me in response to your request will be out of the office until October 25, 2004 Upon this individual s return I will coordinate with her the final materials to be provided to you I anticipate that you will receive the Department s response by the end of the month I will alert you as to the costs associated with your request prior to mailing the information to you I appreciate your patience as the Department prepares its response

Additionally, I must inform you that much of the information that you requested is not in the form of a public record that would be subject to the provisions of the Freedom of Information Act

Sincerely,

Deutschmann

Deborah Drucker Deutschmann
Deputy General Counsel

cc Scott Justice, Esquire
Horger, Horger & Justice LLC
Post Office 518
Orangeburg SC 29116

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

October 29, 2004

Dona L Guffey Esquire
Gergel Nickles & Solomon, P A
Post Office Box 1866
Columbia, South Carolina 29202-1866

Re FOIA Request
James 'Cal" Bell, et al V SC Department of Corrections
Civil Action File No 04-CP-40-1761

Dear Ms Guffey

Please find enclosed the public records that you requested in regards to the above captioned matter In response to Request 1 you will find enclosed a list of positions occupied at the South Carolina Department of Corrections on February 27 2003 which was used to develop the Department s Reduction in Force plan. Additionally, you will find a report containing recall information, with employee social security numbers redacted, in response to Request 7

In regards to Requests 2 –6 , the Department does not have public records' containing the information that you requested that would be subject to the provisions of the Freedom of Information Act

Please submit payment payable to the South Carolina Department of Corrections for the cost of the enclosed copies at $ 25 per page Payment should be sent to Deputy General Counsel Robert Petersen at the Department of Corrections

Sincerely,

Deborah Drucker Deutschmann
Deputy General Counsel

enclosures

cc Scott Justice, Esquire
Horger, Horger & Justice, LLC
Post Office 518
Orangeburg, SC 29116

2004 NOV 19 AM 10
BARBARA
CCC & GC

CERTIFICATE OF SERVICE

I Paula Bregovi the undersigned employee of Gergel, Nickles & Solomon, P A , attorneys for the Plaintiff, hereby certify that I have served the foregoing Motion for Discovery and Memorandum in Support by depositing a copy of same in the United States Mail postage prepaid and addressed as follows

Scott T Justice, Esquire
Horger, Horger & Justice, L L C
Post Office Box 518
Orangeburg South Carolina 29116

This 5th day of November, 2004

Paula Bregovi

Columbia, South Carolina

STATE OF SOUTH CAROLINA)
COUNTY OF Richland)

James "Cal" Bell, et al
☒ Plaintiff

v

SC Dept of Corrections, et al
☐ Defendant

IN THE Court of Common Pleas
Fifth Judicial Circuit
CASE NO
2001 CP-40-1761

MOTION AND ORDER INFORMATION
FORM AND COVER SHEET

Plaintiff's Attorney	Defendant's Attorney
W Allen McKee, III Bar No 4226	Scott I Justice Bar No
Address PO Box 1266	Address PO Box 518
Columbia, SC 29202	Dunsbarg SC 29116
phone 779-8080 fax 256-1266	phone fax
e-mail her	e-mail her

☒ **MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)**
☐ **FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)**
☐ **PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)**

SECTION I Hearing Information

Nature of Motion Discovery
Estimated Time Needed 30 mn Court Reporter Needed ☐ YES / ☒ NO

SECTION II Motion/Order Type

☒ Written motion attached
☐ Form Motion/Order
I hereby move for relief or action by the court as set forth in the attached proposed order

Signature of Attorney for ☒ Plaintiff / ☐ Defendant — Date submitted 11/19/04

SECTION III Motion Fee

☐ PAID – AMOUNT
☐ EXEMPT (check reason)
☐ Rule to Show Cause in Child or Spousal Support
☐ Domestic Abuse or Abuse and Neglect
☐ Indigent Status ☐ State Agency v Indigent Party
☐ Sexually Violent Predator Act ☐ Post-Conviction Relief
☐ Motion for Stay in Bankruptcy
☐ Motion for Publication ☐ Motion for Execution (Rule 69 SCRCP)
☐ Proposed order submitted at request of the court or, reduced to writing from motion made in open court per judge's instructions
Name of Court Reporter
☐ Other

JUDGE'S SECTION

☐ Motion Fee to be paid upon filing of the attached order
☐ Other

JUDGE
CODE Date

CLERK'S VERIFICATION

Collected by Pam Bobel
Date Filed
☒ MOTION FEE COLLECTED 25.
☐ CONTESTED – AMOUNT DUE

SCCA/233 (11/03)

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	COURT OF COMMON PLEAS FIFTH JUDICIAL CIRCUIT
James Cal ' Bell Othella Bernard Kathenna Bower Linda M W Bratton Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath William K Dreyer Jacqueline D Farr, Ruth Fritts Nancy Green, Etta Jane Jones Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith Maggie G Williams and Paula Woodlief, Plaintiffs vs South Carolina Department of Corrections and Palmetto Unified School District No 1 Defendants	Civil Action No 04-CP-40-1761

DEFENDANTS' MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION FOR DISCOVERY

COME NOW Defendants by and through their counsel Horger, Horger and Justice LLC and file this Memorandum in Opposition to Plaintiffs Motion for Discovery

I BACKGROUND FACTS

A SCDC's Reduction in Force in June 2003

In the spring of 2003, the Director of the South Carolina Department of Corrections (SCDC'), Jon Ozmint formally submitted a Reduction in Force Plan to the

South Carolina Budget and Control Board for the elimination of several positions within the agency The RIF plan was submitted because SCDC s budget had been reduced by over $80 million during the prior 30 months [1] After reviewing the information submitted by SCDC, the Budget and Control Board determined that the RIF was procedurally correct and in accordance with SCDC's policy and procedure

On April 1, 2003 SCDC employees were notified of the RIF and that one hundred and forty-eight employees would be affected and laid-off effective June 1, 2003 The RIF affected the following functional areas headquarters management and administrative support staff, administration and management of support programs, and certified educational personnel and educational support staff No uniformed security personnel were scheduled to be cut during this RIF

B Plaintiffs' Separations of Employment and Grievances

Plaintiffs' were separated from their employment with Defendants due to the RIF On June 12 2003 Plaintiffs filed administrative grievances with SCDC disputing their separations of employment due to the RIF On June 16, 2003 SCDC denied Plaintiffs grievances because the RIF plan and policy were consistently and properly applied

Following SCDC's denial of their grievances, Plaintiffs filed grievance appeals to the State Office of Human Resources (' OHR") on June 20, 2003 (*See* Exhibit A Letter from Dona L Guffey to Samuel Wilkins dated June 20, 2003) During the grievance appeals with OHR, Plaintiffs' sought to obtain extensive information from Defendants Specifically Plaintiffs requested that Defendants be required to provide the following

[1] During the years 2001-2002, SCDC s budget was cut by 25% or over $70 million During that time SCDC lost more than 500 security personnel including more than 400 correctional officers even as the inmate population has grown by more than 2,300

A Copy of materials submitted by SCDC in support of its RIF implemented effective June 1 2003
B Copy of all materials provided to SCDC by OHR in reference to the RIF
C List of all positions occupied at SCDC prior to the RIF
D List of all positions eliminated as a result of the RIF
E List of all vacancies existing immediately prior to the RIF
F List of all vacancies filled since the RIF
G List of all new positions approved since the RIF
H Copy of materials submitted to SCDC in support of any retirement incentives offered during the calendar years 2002 and 2003
I List of new positions approved for SCDC during the calendar years 2002 and 2003
J List of all reclassifications, promotions, and transfers implemented by SCDC during the calendar years 2002 and 2003

(*See* Exhibit B, Letter from Allen Nickels to Terry Baggot dated August 29 2003)

SCDC informed OHR that it should provide Plaintiffs with materials responsive to Requests A and B, and that information responsive to Request D was already provided by SCDC and should have been previously provided to Plaintiffs through OHR. SCDC however maintained that it should not be required to respond to Requests C E F G, H I, and J because the grievance appeal before OHR was limited to how the RIF plan and policy were applied and Plaintiffs' requests, which related to SCDC s use and allocation of its resources exceeded the scope of the appeal [2] (*See* Exhibit C, Letter from Deborah Drucker Deutschmann to Terry Baggott dated October 1, 2003)

On October 9, 2003, OHR provided Plaintiffs' with responses to Requests A and B OHR also allowed Plaintiffs the opportunity to respond to Defendants' contentions regarding Requests C through J (*See* Exhibit E, Letter from Chris Poore to Allen Nickles dated October 9 2003) Plaintiffs continued to insist that the information related

[2] During the grievance before OHR, Plaintiffs also made additional requests for SCDC to respond to specific inquiries and allegations (See Exhibit C and Exhibit D Letter from Dona L Guffey to Terry Baggott dated September 8, 2003) These Exhibits demonstrate how SCDC fully and completely responded to Plaintiffs specific inquiries and allegations regarding the RIF

to their grievances would allegedly show that employees and/or positions were arbitrarily protected or removed from consideration for reasons unrelated to RIF criteria (*See* Exhibit F Letter from Dona Guffey dated October 14 2003)

In response SCDC maintained that ample information had been provided to OHR and Plaintiffs to demonstrate that it complied with its RIF policy and plan (*See* Exhibit G Letter from Deborah Drucker Deutschmann to Chris Poore dated November 10 2003) SCDC further maintained that the materials requested (Requests C through J) were not relevant for the Director of OHR to determine that no material issue of fact existed concerning an improper or inconsistent application of the RIF policy or plan [3]

During the appeals, the Director of OHR considered Plaintiffs' specific allegations that the RIF was executed in an arbitrary and capricious manner including, but not limited to Plaintiffs allegations that educators were singled out for the RIF in an arbitrary and capricious fashion individuals and/or positions were arbitrarily protected or removed from consideration for separation for reasons unrelated to RIF criteria and the RIF plan was being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government through legal action

After considering these allegations, on January 9 2004 the Director of OHR determined that Plaintiffs allegations did not raise a material issue of fact as to the improper or inconsistent application of SCDC's RIF policy or plan (*See* Exhibit H, Letter from Samuel Wilkins to Dona Guffey dated January 9, 2004) Accordingly, the grievance appeals were denied because a RIF is grievable as an appeal only if the

[3] SCDC further maintained that it fully answered all questions regarding how the RIF policy and plan was applied and answered all questions regarding management decisions in the functional area, educational programs where Plaintiffs worked

Director determines that there is a material issue of fact that an agency inconsistently or improperly applied its RIF policy of plan S C Code Ann. § 8-17-330

On February 2 2004, Plaintiff's requested reconsideration of the Director s January 9 determination (*See* Exhibit I Letter from Allen Nickles to Samuel Wilkins dated February 2, 2004) In their request, Plaintiffs repeated their previous claims but presented new allegations to the Director including that SCDC refused to provide Plaintiffs with access to information they asserted were relevant to their claims On February 25 2004 SCDC filed a response stating that reconsideration of the Director s determination was unnecessary as Plaintiffs had not raised any new information to be considered regarding the issue of whether SCDC had improperly or inconsistently applied its RIF policy or plan (*See* Exhibit J Letter from Debbie Drucker Deutschmann to Deborah Clark dated February 25, 2004)

After reviewing Plaintiffs request and SCDC s response on March 22 2004 the Director issued a letter denying Plaintiffs request In that letter the Director specifically responded to each of the contentions raised by Plaintiffs in their request for reconsideration and reaffirmed his prior decision that Plaintiffs allegations did not raise a material issue of fact concerning the improper or inconsistent application of SCDC s RIF policy or plan (*See* Exhibit K, Letter from Samuel Wilkins to Allen Nickles dated March 22, 2004)

C **Plaintiffs' Petition for Judicial Review**

On April 6 2004 Plaintiff's filed a petition for judicial review resulting in the above-captioned matter In their petition, Plaintiffs assert that during the administrative grievance process, SCDC failed to provide them access to information they assert is

relevant to their claims (Petition ¶ 18) In response to Plaintiffs petition and pursuant to the Administrative Procedures Act (South Carolina Code Section 1-23-380(A)(3)), on April 28, 2004, OHR submitted for the Court s consideration a certified copy of the entire record of Plaintiffs grievance proceedings [4]

On June 15 2004 Plaintiffs served Interrogatories and Production Responses on Defendants which were as follows

1 A complete list of all positions occupied at SCDC prior to the RIF
2 A complete list of all positions eliminated as a result of the RIF
3 A complete list of all vacancies existing immediately prior to the RIF
4 A complete list of all vacancies filled since the RIF
5 A complete list of all new positions approved since the RIF
6 A complete copy of materials submitted by SCDC in support of any retirement incentives offered during the calendar years 2002 2003 and 2004
7 A complete list of positions approved for SCDC for the calendar years 2002, 2003, and 2004
8 A complete list of all reclassifications promotions and transfers implemented by SCDC during the calendar years 2002, 2003, and 2004
9 A copy of the Palmetto Unified School District budget for the fiscal years 2002-2003 and 2003-2004
10 A complete list of all employees indicating position and hire date, assigned responsibilities that were performed by certified educators prior to the RIF
11 A complete list of all employees affected by the RIF through reclassification bumping or otherwise who have had their salary reinstated to pre-RIF levels
12 A complete list of all employees rehired or recalled following the RIF

(*See* Exhibit L)

When Defendants did not respond to the requests, Plaintiffs threatened to file a motion to compel In a letter dated August 23, 2004, Defendants informed Plaintiffs that they would not respond to the requested discovery stating the requests were improper and Defendants were under no obligation, pursuant to the Rules of Civil Procedure to answer

[4] Section 1 23-380(A)(5) of the Administrative Procedures Act provides that a judicial review of an administrative agency s decision shall be conducted by the court without a jury and shall be confined to the record.

Plaintiffs requests (*See* Exhibit M, Letter from Scott T Justice to Dona L Guffey dated August 23, 2004) Moreover, Defendants informed Plaintiffs that the Court already possessed a full and adequate record from which to conduct the judicial review

Subsequently on September 10, 2004, Plaintiffs served Freedom of Information Act (FOIA ') requests on Defendants, which were as follows

1 A complete list of all positions occupied at SCDC prior to the RIF effective June 1, 2003
2 A complete list of all vacancies existing immediately prior to the RIF
3 A complete list of all new positions approved since the RIF
4 A complete list of all reclassifications, promotions, and transfers implemented by SCDC during the calendar years 2002, 2003, and 2004
5 A complete list of all employees, indicating position and hire date, assigned responsibilities that were performed by certified educators prior to the RIF
6 A complete list of all employees affected by the RIF through reclassification, bumping, or otherwise who have had their salary reinstated to pre-RIF levels
7 A complete list of all employees rehired or recalled following the RIF

(*See* Exhibit N)

Each of the FOIA requests above were included in Plaintiffs' interrogatories and production requests to Defendants

On October 29 2004, SCDC provided Plaintiffs with responses to Request No 1 which was a list of positions occupied at SCDC on February 27, 2003, that was used to develop the RIF plan (See Exhibit O, Letter from Deborah Drucker Desutchmann to Dona Guffey dated October 29, 2004) SCDC also provided Plaintiffs' with responses to Request No 7 which contained recall information SCDC provided these responses pursuant to FOIA because these were "public records as defined by the Act Defendants however did not respond to Requests Nos 2-6 because they did not have "public records" containing the information Plaintiffs' requested that would be subject to

the provisions of FOIA S C Code Ann §§ 3-40-30, 3-40-40 Subsequently, Plaintiffs' filed this Motion for Discovery

C Plaintiffs have previously received information currently requested in their Motion for Discovery

In their Motion, Plaintiffs insinuated that Defendants had not responded to any requests for information and they moved that Defendants be required to 'fully ' respond to Plaintiffs' First Set of Interrogatories and Requests for Production Plaintiffs' FOIA request and require Jon Ozmint (Director of SCDC) John Near (Human Resources Director of SCDC), and Wendell Blanton (Superintendent of the Palmetto Unified School District) to be available for depositions [5] Plaintiffs however have already received the following information

1 A complete list of all positions occupied at SCDC prior to the RIF effective June 1, 2003 (Interrogatory No 1 FOIA Request No 1 and Request C from August 29 2003 letter) and

2 A complete list of all employees rehired or recalled following the RIF (Interrogatory No 12 & FOIA Request No 7)

Moreover during the course of their grievances and grievance appeals Plaintiffs received a copy of materials submitted by SCDC in support of its RIF implemented effective June 1, 2003, a copy of all materials provided by SCDC to OHR in reference to the RIF and a list of all positions eliminated as a result of the RIF Clearly Plaintiffs have received an abundant amount of information regarding the contested RIF

II ARGUMENTS AND AUTHORITIES

Plaintiffs move that Defendants be compelled to respond to their remaining discovery requests because they claim the official record of their grievances is incomplete

[5] Plaintiffs Motion for Discovery was the first time Plaintiffs have ever requested that Mr Ozmint Mr Near, and Mr Blanton be made available for depositions

and the inclusion of the discovery responses would provide the Court with a ' full and adequate" record from which to conduct a judicial review Again, Plaintiffs petition for judicial review is based on their claim that the RIF was conducted in an irregular manner In their Motion, Plaintiffs argue that they are entitled to the requested remaining discovery pursuant to South Carolina Code Sections 1-23-380(A)(4) and (5) and *Ross v Medical Univ of South Carolina*, 317 S C 377, 453 S E 2d 880 (S C 1995) but fail to adequately explain why the discovery should be ordered or why it should be included in the record [6] For the reasons set forth below Plaintiffs' Motion should be denied

A Plaintiffs have failed to satisfy the legal standard to justify the compelling of discovery and the inclusion of such discovery in the official record

Section 1-23-380(A)(5) of the Administrative Procedures Act provides that a judicial review of an administrative agency s decision shall be conducted by the court without a jury and shall be confined to the record [7] Only under limited circumstances can the Court order additional discovery and/or add any new evidence to the official record while judicially reviewing an agency's decision. If a party alleges that an irregularity existed in the procedure before the agency, the court in its discretion may order discovery and permit additional evidence to be presented if the allegation of irregularity is not apparent on the record S C Code Ann § 1-23-382(A)(5) Additional evidence may only be added to the record if requested by a party and if the court deems it is

[6] In their Motion, it appears Plaintiffs are not only seeking an order compelling Defendants to respond to their discovery but move that this information be added to the official record for the Court s review Defendants do not believe that Plaintiffs have properly moved for the inclusion of any new and additional evidence in the official record Rather Defendants believe that if the Court orders the requested discovery Plaintiffs must then file a separate motion asking that the additional evidence be included in the record Out of an abundance of caution however Defendants will respond as to why any additional evidence should not be included in the record

[7] Defendants maintain that the Court already possesses a full, accurate and complete record of Plaintiffs grievance appeals and the judicial review should be confined to this record.

material and if there were good reasons for the party's failure to present it in the proceeding before the agency S C Code Ann § 1-23-380(A)(4) Plaintiffs have failed to set forth any legitimate arguments to satisfy either legal standard

1 Section 1-23-380(A)(5)

The South Carolina Supreme Court has interpreted Section 1-23-380(A)(5) to allow a court, in its discretion to order discovery if an allegation of irregularity not apparent on the record, exists *Ross v Medical Univ of South Carolina* 317 S C 377 453 S E 2d 880 (S C 1995) The ability for the court to order discovery under *Ross*, however is very limited In *Ross*, the court held that an appeal from an administrative tribunal should ordinarily be determined upon the record of that tribunal, and only when that record fails to present the hearing in the manner sufficient for the determination of the merits of the appeal or when some extraordinary reason requires it, should the court hear the additional evidence *Ross* 317 S C at 380-381 453 S E 2d at 883 *Ross* contemplates only ordering discovery in judicial review when allegations of procedural irregularities exist during the appeal

This Court should not require Defendants to respond to Plaintiffs additional requested discovery because Plaintiffs cannot demonstrate that their grievance appeals before OHR were conducted in a procedurally insufficient manner As provided in the Background Facts and in the supporting Exhibits during the grievance appeals before OHR Plaintiffs were provided with numerous documentation and information Plaintiffs were also allowed to present specific allegations regarding the RIF which were thoroughly responded to by SCDC (*See* Exhibits A, D, and I In its determinations

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OHR specifically addressed and responded to each of Plaintiffs' contentions [8] (*See* Exhibits H and K.) While Plaintiffs may not have received the information and/or documentation they desired during the grievance this does not indicate a procedural irregularity with the administration of the appeal

OHR s review of Plaintiffs contentions that the RIF was conducted in an arbitrary and capricious manner shows that no procedural irregularities exist in the administrative decision Therefore the record establishes that Plaintiffs grievance appeals were conducted in a procedurally proper manner

2 **Section 1-23-380(A)(4)**

Even if the Court orders Defendants to respond to Plaintiffs requested discovery Plaintiffs have failed to set forth evidence satisfying the legal standard to allow the additional information to be included in the official record pursuant to Section 1-23-380(A)(4) Section 1-23-380(A)(4) provides that if an application is made to the court to present additional evidence during a judicial review, a party must demonstrate that the additional evidence is material and that there were good reasons for failure to present it in the proceeding before the agency [9] The requested discovery Plaintiffs seek to be included in the official record is not material or relevant to the sole issue before the Court's judicial review whether or not OHR was correct in its determination that no material issue of fact existed as to the improper or inconsistent application of the RIF plan. Rather the requested discovery is not relevant because it exceeds the scope of the

[8] These contentions included Plaintiffs allegations that the educators were singled out for the RIF in an arbitrary and capricious fashion that individuals and/or positions were arbitrarily protected or removed from consideration for separation for reasons unrelated to the RIF criteria, and that the RIF plan was being exercised arbitrarily and capriciously to relate against a class of employees (educators)

[9] If this Court determines that Plaintiffs have satisfied the burden of Section 1-23-380(A)(4) the Court may then order that the additional evidence be taken before the agency upon conditions determined by the Court, and the agency may modify its findings and decision by reason of the additional evidence S C Code Ann. § 1-23-380(A)(4)

grievance appeal as it relates to SCDC s use and allocation of its resources not the manner or application of the RIF

Moreover, the requested discovery in Plaintiffs Motion is the same information they sought during their grievances and grievance appeals before OHR. OHR agreed with Defendants that this information did not concern the central issue in the grievance appeal which was whether or not a material issue of fact existed that SCDC inconsistently or improperly applied its RIF plan The Court should not disregard OHR s position regarding this matter S C Code Ann § 1-23-380(A)(6)

B Plaintiffs' discovery request should be denied because it seeks an improper judicial review of OHR's determination

As previously stated, Plaintiffs believe the RIF was conducted in an irregular arbitrary and capricious manner in which certain educators were singled out for adverse employment actions OHR disagreed and determined that Plaintiffs allegations did not raise a material issue of fact as to the improper or inconsistent application of SCDC s RIF policy or plan As such Plaintiffs grievance appeals were denied because their allegations regarding the RIF were non-grievable S C Code Ann § 8-17-330, S C H R Reg 19-718 04(A)

Through their Motion for Discovery, Plaintiffs are seeking to circumvent a proper judicial review of OHR s determination that no material issue of fact exists to the improper or inconsistent application of the RIF policy or plan If this Court orders Defendants to respond to Plaintiffs requested discovery it would be improperly overruling OHR's judgment that the information was unnecessary for the grievance appeal More importantly if this Court orders the requested discovery it would be

incorrectly replacing its judgment for that of OHR s as to whether or not Plaintiffs' had a proper grievance appeal pursuant to S C Code Ann § 8-17-330

THEREFORE Defendants respectfully request that this Court affirm their decisions regarding Plaintiffs grievances

Dated this the 2 day of February 2005

Respectfully submitted

HORGER HORGER & JUSTICE, LLC

By _____

Scott T Justice
Attorney for Defendant
160 Centre Street, NE, Suite A
P O Box 518
Orangeburg SC 29116-0518
(803) 531-1700

I hereby certify that I have hand delivered mailed a true and correct copy of the within Motion/Pleading/Document to all counsel of record this 3 day of February 2005

HORGER, HORGER & JUSTICE LLC

By _____
Scott T Justice Esquire

SCDC
0079 2111

STATE OF SOUTH CAROLINA	IN THE COURT OF COMMON PLEAS
	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND	
	C/A NO 04-CP-40-1761
James "Cal" Bell, Othella Bernard, Katherina Bower, Linda M.W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K. Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief,	
Plaintiffs,	
vs	ORDER
South Carolina Department of Corrections and Palmetto Unified School District No 1,	
Defendants	

RICHLAND COUNTY
FILED
2005 MAY -4 PM 1 49
BARBARA A SCOTT
C C C & G S

This matter came before me on Plaintiffs' motion to compel or in the alternative for discovery Having considered the materials presented by the parties and the argument of counsel on January 31, 2005, for the following reasons, the Plaintiffs' motion is granted

BACKGROUND

Plaintiffs are each professional certified educators formerly employed in full-time instructional or administrative positions in the Palmetto Unified School District. This 'unified school district was created by statute to serve inmates in the South Carolina Department of Corrections S C Code Ann § 24-25-10, et seq Plaintiffs were each removed from their positions as a result of a reduction in force implemented effective June 1, 2003 Plaintiffs have exhausted all

administrative remedies and are now before this Court seeking reinstatement to their former positions of employment.

DECISION

Plaintiffs' motion requests information regarding issues relevant to the reduction in force which resulted in their separations from employment. The information requested includes the identification of individuals and/or positions that were protected or removed from consideration for reduction in force, positions occupied before and after the reduction in force, positions filled following the reduction in force new positions reclassifications promotions and transfers implemented during the period leading up to and following the reduction in force

Pursuant to S C Code Ann. § 1-23-380(A)(4) and (5) this Court may take additional evidence that has not been presented in the agency proceeding if it is shown to be material In cases of alleged irregularities in procedure before the agency, not shown in the record proof thereon may be taken in the court § 1-23-380(A)(5) In Ross v Medical University of South Carolina, 317 S C 377 453 S E.2d 880 (1995) the Supreme Court held § 1-23-380[(A)][(5)] expressly authorizes Circuit Court to accept proof of alleged irregularity in the agency proceeding

When used in a retaliatory manner a reduction in force violates fundamental rights protected by the South Carolina Constitution Our Supreme Court has repeatedly held that a public employee cannot be deprived of a liberty or a property interest without due process As stated in Brown v S C State Board of Education, 301 S C 326, 329, 391 S E 2d 866, 867 (1990), "The right to hold specific employment and the right to follow a chosen profession free from unreasonable governmental interference come within the liberty and property interests protected by the Due Process Clause Accordingly, the Court held in Brown that when important issues turn on questions of fact, due

process requires a full adversarial proceeding In this context, 'evidence used to prove the State s case must be disclosed to the individual so that he or she has an opportunity to show that it is untrue 301 S C at 329 391 S E 2d at 867

In this case, Plaintiffs contend that their selection for reduction in force was in retaliation for enforcing their right to be paid in compliance with state law These rights were confirmed by the South Carolina Court of Appeals in Abraham v Palmetto Unified School District No 1, 343 S C 36, 538 S E 2d 656 (2000) In Abraham, the Court of Appeals held that the Department and District are required by Code Section 24-25-70(7) to provide additional compensation to instructors based upon the average of local school supplements throughout the state This decision addressed the "unified nature of the Palmetto Unified School District which is a central issue in the Plaintiffs claims here For example, Plaintiffs challenge the division of the 'unified ' district into geographical areas which resulted in loss of bumping rights by senior, higher paid educators

The Plaintiffs discovery requests are each directed toward demonstrating that they have been singled out for a disproportionate impact due to reduction in force For example, Plaintiffs have sought information to determine whether

- positions were protected from reduction in force thereby increasing the number of educators separated from employment,
- positions were created and/or filled before or after the reduction in force,
- non-certified employees were assigned to positions previously held by professional educators,
- positions were reclassified or transferred in the period preceding and after the reduction in force

This information will allow the Plaintiffs to develop evidence regarding their claim that the Defendants violated their rights under state law In granting Plaintiffs motion, this Court takes note that in 1997, the Supreme Court held that Article I, § 22 of the South Carolina Constitution requires an administrative agency to give its employees notice and an opportunity to be heard at some point before it makes a final decision. Ross v Medical University of South Carolina, 328 S C 51, 68, 492 S E 2d 62, 71 (1997) In Ross, the agency did afford the employee an opportunity to be heard In the present case however the Plaintiffs have been afforded no such opportunity In this context the information requested is relevant to demonstrating whether Plaintiffs should be reinstated or their claims remanded for a hearing before the South Carolina State Employee s Grievance Committee

Other jurisdictions have addressed the propriety of discovery when retaliation is alleged in a reduction in force In ordering discovery to address a North Carolina reduction in force the court observed Since direct evidence of discrimination is rarely obtainable plaintiffs must rely on circumstantial evidence and statistical data, and evidence of an employer s overall employment practices may be essential to plaintiffs' prima facia case " Rodger v Electronic Data Systems Corporation, 155 F R.D 537 (N C Dist. Ct 1994) citing Morris v. Denver, 80 F R D 289 292 (D Colo 1978, citing Rich v Martin Marietta Corp., 522 F 2d 333 (10th Cir 1975)) In a Pennsylvania case, Miles v Boeing Company, 154 F R.D 117 (Ed PA 1994) the plaintiff sought information similar to the request in the instant case The plaintiff moved to compel disclosure of documents for a two year span regarding the defendant s labor needs, any changes of those needs and the defendant's general policy and practice with respect to employment (154 F R.D at 120) The court granted this motion, rejecting an argument that the request was not relevant and overly broad Similarly, a Florida district court granted a discovery motion alleging that the defendant s reduction

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in force plan was a pretext in order to fire the plaintiff This order compelled disclosure of "personnel files and other documents [that] may lead to the discovery of admissible evidence under plaintiff's theory that the reduction in force was in fact a pretext and/or the defendant intended to discriminate on the basis of age' Nevin v CSX Transportation 2003 W L 22005030 (M D Fl)

The request for discovery in this case falls well within the parameters required for due process and determined to be appropriate in similar circumstances This request includes compelling a response to Plaintiffs Interrogatories and Requests for Production dated June 15 2004 Plaintiffs have additionally requested full responses to their FOIA request of September 10 2004 and making available for deposition the Department's Director Human Resources Director and Superintendent. This Court need not reach Plaintiffs' FOIA request in that it appears the information sought therein is included in their interrogatories and requests for production As to depositions, it is the judgment of this Court that the Plaintiffs may schedule the depositions of the identified employees of the Defendants following receipt of the interrogatory responses and documents identified for disclosure The depositions of these employees shall be limited to their respective roles in the challenged reduction in force and explication of any documents produced as a result of this order

ORDER

For the reasons stated above, the Defendants shall take the following action

1 Within thirty (30) days of this order, Defendants shall deliver to Plaintiffs answers to Plaintiffs interrogatories dated June 15 2004

2 Within thirty (30) days of this order, Defendants shall deliver to Plaintiffs documents responsive to Plaintiffs' requests for production dated June 15, 2004,

3 Within thirty (30) days following Defendants response to Plaintiffs interrogatories

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and requests for production of documents Defendants will make the following individuals available for deposition

a Jon Ozmint Director South Carolina Department of Corrections

b John Near, Human Resources Director, South Carolina Department of Corrections

c Wendell Blanton, Superintendent, Palmetto Unified School District No 1

4 This Court will retain jurisdiction to address any issues regarding compliance with this order

AND IT IS SO ORDERED

G Thomas Cooper Jr
Circuit Court Judge, Fifth Judicial Circuit

5-2-, 2005
Columbia, South Carolina

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO 04 -CP-40- 1761

James C Bell, et al

PLAINTIFF(S)

SC Dept of Corrections,

DEFENDANT(S)

RICHLAND COUNTY FILED
2005 MAY -4 PM 4:19
BARBARA A SCOTT
C.C.C. & G.S.

CHECK ONE

[ ] **JURY VERDICT** This action came before the court for a trial by jury The issues have been tried and a verdict rendered

[✓] **DECISION BY THE COURT** This action came to trial or hearing before the court The issues have been tried or heard and a decision rendered

[ ] **ACTION DISMISSED** (*CHECK REASON*) [ ] Rule 12(b) SCRCP [ ] Rule 41(a) SCRCP (Vol Nonsuit) [ ] Rule 43(k) SCRCP (Settled) [ ] Other _____

[ ] **ACTION STRICKEN** (*CHECK REASON*) [ ] Rule 40(j) SCRCP [ ] Bankruptcy [ ] Binding arbitration subject to right to restore to confirm vacate or modify arbitration award [ ] Other _____

IT IS ORDERED AND ADJUDGED [✓] See attached order [ ] Statement of Judgment by the Court

Dated at _____ South Carolina this _____ day of _____ 20____

_____
PRESIDING JUDGE

This judgment was entered on the ____ day of _____ 20____ and a copy mailed first class this 05 day of April 2005 to attorneys of record or to parties (when appearing pro se) as follows

W Allen Nickles III

ATTORNEY(S) FOR THE PLAINTIFF(S)

Scott T Justice

ATTORNEY(S) FOR THE DEFENDANT(S)

s/ Barbara A. Scott
CLERK OF COURT

SCRCP APP-24

SCRCP FORM 4 (Revised 5/00)

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STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

COURT OF COMMON PLEAS
FIFTH JUDICIAL CIRCUIT

James Cal" Bell Othella Bernard)
Katherina Bower, Linda M.W)
Bratton Ann T Bridges Rance C)
Cobb, Jeanne B Croxton, Bernetha)
L. Culbreath, William K. Dreyer)
Jacqueline D Farr Ruth Fritts)
Nancy Green, Etta Jane Jones,)
Geneva M Martin, Mary H)
McCabe Beverly McClanahan)
Max D Randolph Carolyn McIver)
Smith Maggie G Williams and)
Paula Woodlief)
)
Plaintiffs,)
)
vs)
)
South Carolina Department of)
Corrections and Palmetto Unified)
School District No 1,)
)
Defendants)

Civil Action No 04-CP-40-1761

FILED
2005 MAY 31 AM 11 29
CLERK OF COURT
RICHLAND CO. S.C.

DEFENDANTS' MOTION FOR RECONSIDERATION

COME NOW Defendants by and through their counsel Horger Horger, and Justice LLC pursuant to Rule 60 (b) of the South Carolina Rules of Civil Procedure and file this Motion for Reconsideration

I. **BACKGROUND**

This Motion for Reconsideration stems from what Defendants perceive as an erroneous application of S C Code Ann § 1-23-380(A)(4)(5) and *Ross v Medical*

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University of South Carolina, 317 S C 377, 453 S E 2d 880 (1995) to the issues presented

Plaintiffs seek discovery of information that is unrelated to a procedural irregularity of the administrative appeal Plaintiffs claim the discovery will help support the record during judicial review of the appeal however a proper application of S C Code Ann. § 1-23-380(A)(4) (5) and *Ross v Medical University of South Carolina* in this case holds that Plaintiffs have not shown that the administrative appeal was procedurally irregular and the discovery sought does not substantiate any claim that the procedure was irregular In light of these arguments, Defendants request that this Honorable Court reconsider its Order filed May 4, 2005, for the foregoing reasons

II ARGUMENTS AND AUTHORITY

a Erroneous Application of S C Code Ann § 1-23-380(A)(5)

S C Code Ann. § 1-23-380(A)(5) of the Administrative Procedures Act provides that judicial review of an administrative agency's decision shall be conducted by the court without a jury and shall be confined to the record. Only under limited circumstances can the court order additional discovery and/or add any new evidence to the official record while judicially reviewing an agency s decision If a party alleges that an irregularity existed in the procedure before the agency, the court, in its discretion, may order discovery and permit additional evidence to be presented if the allegation of irregularity is not apparent on the record S C Code Ann § 1-23-382(A)(5), *Ross v Medical University of South Carolina*, 317 S C 377, 453 S E 2d 880 (1995)

The Order filed makes no finding that Plaintiffs alleged that an irregularity existed in the procedures of the OHR administrative grievance hearing Plaintiffs only contend

that the record for the Court's consideration on judicial review is incomplete and the inclusion of the discovery responses would provide the Court with a full and adequate record from which to conduct a judicial review Since Plaintiffs do not allege that the administrative procedures were irregular and no procedural irregularity even exists a proper application of S C Code Ann § 1-23-380(A)(5) is that judicial review of the OHR decision must be confined to the record as it was presented at the grievance appeal Accordingly Defendants respectfully request that this Court reconsider its Order granting Plaintiffs Motion to Compel discovery on this ground and deny Plaintiffs Motion

b Erroneous Application of S C Code Ann § 1-23-380(A)(4)

Additional evidence may only be added to the record if requested by a party and if the court deems it is material and if there were good reasons for the party's failure to present it in the proceeding before the agency S C Code Ann § 1-23-380(A)(4) The Order filed May 4, 2005, makes no finding that Plaintiffs' discovery requests are material for judicial review of the OHR decision and Plaintiffs did not produce any evidence, compelling or otherwise, demonstrating this fact Plaintiffs discovery requests exceed the scope of the review, as it only relates to SCDC's use and allocation of its resources not the manner or application of the RIF A fair reading of section 1-23-380(A)(4) is that the discovery requested is immaterial to the issue of whether or not OHR was correct in its determination that no material issue of fact existed as to the improper or inconsistent application of the RIF plan For this reason Defendants request that this Court reconsider its Order granting Plaintiffs' Motion to Compel discovery

c. Erroneous Application of *Ross v MUSC*

Likewise, this Court also erred in its application of *Ross* In *Ross* the South Carolina Supreme Court reviewing the substance of S C Code Ann § 1-23-380(A)(5), held that an appeal from an administrative tribunal should ordinarily be determined upon the record of that tribunal, and only when that record fails to present the hearing in the manner sufficient for the determination of the merits of the appeal or when some extraordinary reason requires it, should the court hear additional evidence *Ross*, 317 S C at 380-381, 453 S E 2d at 883 The *Ross* Court contemplated just such an extraordinary reason when allegations of procedural irregularities existed during the appeal However in this case, Plaintiffs failure to receive desired information is not evidence of a procedural irregularity nor any other extraordinary reason and the Order entered on this issue makes no such finding

Furthermore, the circumstances underlying *Ross* contrast significantly to the circumstances in this case In *Ross* the plaintiff claimed he was denied a fair hearing at the agency level since the Vice President acted in a dual capacity as both accuser and judge and made improper *ex parte* communications with General Counsel for MUSC (the plaintiff's prosecutor) The plaintiff sought discovery requests to substantiate his position that procedural irregularities existed during his administrative appeal-namely that the Vice President (also the judge) engaged in *ex parte* communications with his employer s General Counsel (also the prosecutor) The court held that the plaintiff was entitled to the discovery of this information since it related to an irregularity in the agency proceeding *Ross* 317 S C at 381-384, 453 S E 2d at 883-885

A fair reading of *Ross* holds that additional discovery is only allowed during judicial review of an administrative appeal when a party asserts that a procedural

irregularity of an administrative appeal occurred and the discovery sought substantiates the alleged irregularity or some other extraordinary reason warrants the discovery As argued, Plaintiffs have not asserted any procedural irregularities of the administrative appeal and no irregularities even exist Accordingly Defendants request that this Court reconsider its application of *Ross* and S C Code Ann §§ 1-23-380(A)(4)(5) and deny Plaintiffs Motion to Compel

Dated this the 25 day of May 2005

Respectfully submitted,

HORGER HORGER & JUSTICE LLC

By _____

Scott T Justice Esquire
Attorney for Defendants
160 Centre Street, NE, Suite A
P O Box 518
Orangeburg SC 29116-0518
(803) 531-1700

I hereby certify that I have hand delivered mailed a true and correct copy of the within Motion/Pleading/Document to all counsel of record this 26 day of May 2005

HORGER, HORGER & JUSTICE, LLC

By _____
Scott T Justice Esquire

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT C/A NO 04-CP-40-1761
James "Cal" Bell, Othella Bernard, Katherina Bower, Linda M.W Bratton, Ann T Bridges, Rance C. Cobb, Jeannie B Croxton, Bernetha L. Culbreath, William K. Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M. Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief, Plaintiffs, vs South Carolina Department of Corrections and Palmetto Unified School District No 1, Defendants	PLAINTIFFS' MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION FOR RECONSIDERATION

On May 4, 2005, this Court issued an order compelling Defendants South Carolina Department of Corrections and Palmetto Unified School District No 1 to provide certain information withheld during the administrative process conducted pursuant to the South Carolina State Employees Grievance Act. S C Code Ann §§ 8-17-310 et seq By correspondence dated May 27, 2005 Defendants provided Plaintiffs a copy of a document styled "Motion for Reconsideration pursuant to Rule 60(b) of the South Carolina Rules of Civil Procedure For the following reasons, this motion is without merit and Defendants should be compelled to provide the discovery ordered by this Court

1 **Defendants may not rely upon Rule 60(b) in support of their motion**

The plain language of Rule 60(b) confines its application to those circumstances which are enumerated as follows

(1) mistake, inadvertence, surprise, or excusable neglect,

(2) newly discovered evidence which by due diligence could not have been discovered in time to move for a new trial under Rule 59(b)

(3) fraud, misrepresentation, or other misconduct of an adverse party,

(4) the judgment is void, and

(5) the judgment has been satisfied, released, or discharged, or a prior judgment upon which it is based has been reversed or otherwise vacated or it is no longer equitable that the judgment should have prospective application

Nothing in Defendants motion remotely approaches the circumstances which support reconsideration under Rule 60(b) For example, the Arguments and Authorities advanced by Defendants each relate to alleged erroneous applications of statute or legal authorities There is no claim of 'mistake, inadvertence surprise or excusable neglect Similarly there is no claim of 'newly discovered evidence", 'fraud or that the judgment challenged is void or has been satisfied or vacated Because the Defendants seek to obtain relief based upon an alleged mistake of law rather than fact, Rule 60(b) is inapplicable Hillman v Pinion, 347 S C 253, 554 S E 2d 427 (S C App 2001)

It is apparent that Defendants seek to invoke Rule 60(b) as an alternative to a motion to alter or amend the challenged judgment pursuant to Rule 59(e) In contrast to Rule 60(b), this rule allows parties to seek to alter or amend judgments based upon alleged mistakes of law It is not available to Defendants in this case because any motion to alter or amend a judgment must be filed within ten

days of the entry of the order The South Carolina Supreme Court has held that Rules 59 and 60 serve separate purposes and that any relief under Rule 59 must be based upon a timely motion which cannot be extended See Gray v Bryant, 298 S C 285 379 S E 2d 894 (1989) See also, Heins v Heins, 344 S C 146 543 S E.2d 224 (Ct. App 2001)(any modification of an order, even on the court s own initiative must occur within ten days of the entry of judgment) In this context it is clear that Defendants' request for reconsideration based upon alleged errors of law is untimely and must be denied

2 **Rule 60(b) does not support Defendants' motion**

To qualify for relief under Rule 60(b) in appropriate circumstances, requires a showing of a meritorious defense See Fassett v Evans 364 S C 42 610 S E 2d 841 (S C App 2005), Paul Davis Systems, Inc v Deepwater of Hilton Head, L L C., 362 S C 220, 607 S E 2d 358 (S C App 2004) This requires the movant to present evidence proving the facts essential to obtaining relief Bowers v Bowers 304 S C 65 403 S E 2d 127 (Ct App 1991) The decision to grant or deny a motion under Rule 60(b) is within the sound discretion of the trial court. This discretion must be exercised in keeping with 'South Carolina s strong policy toward finality of judgments Lanier v Lanier, 216 S E 2d 456, 461 (S C App 2005)(quoting Bowman v Bowman, 357 S C 146, 152, 591 S E 2d 654 657 (Ct. App 2004))

In this case the Court correctly exercised its power under S C Code Ann § 1-23-380(A)(4) and (5) to afford the Plaintiffs an opportunity to demonstrate irregularities in the reduction in force procedure which resulted in their separations from employment. Specifically it is asserted that both the Defendants and the Office of Human Resources failed to properly apply legislation which establishes that the Plaintiffs were each employed within a statewide 'unified school district See S C Code Ann §§ 24-25-10 et. seq Rather than afford the Plaintiffs an opportunity to compete for

remaining positions on a statewide basis, an "irregular" division of the statewide district deprived Plaintiffs continued employment based upon their service and seniority Additionally from the outset of this litigation, Plaintiffs have contended that they were selected for separation in retaliation for bringing a pay claim against the Defendants which resulted in an order by the South Carolina Court of Appeals compelling Defendants to raise their compensation to a level required by statute

In this case, it is clear that due process entitles the Plaintiffs to the relief granted by the Court It is further clear that the Defendants seek to deny Plaintiffs a full and fair opportunity to present their case In summary Defendants' motion is not supported by rule law or equity

CONCLUSION

For the reasons stated above it is respectfully submitted that the Defendants motion is not supported by Rule 60(b), is untimely, and is without merit. Accordingly, Defendants' motion should be denied and Defendants should be compelled to comply with the order of this Court issued May 4 2005

GERGEL, NICKLES & SOLOMON, P A

By _____

W Allen Nickles III
Dona L Guffey
1519 Richland Street
Post Office Box 1866
Columbia, South Carolina 29202-1866
(803) 779-8080

Attorneys for Plaintiffs

June 7, 2005
Columbia, South Carolina

CERTIFICATE OF SERVICE

I, Paula Bregovi, the undersigned employee of Gergel, Nickles & Solomon, P A , attorneys for the Plaintiff, hereby certify that I have served the foregoing Plaintiffs Memorandum in Opposition to Defendants' Motion for Reconsideration, by depositing a copy of same in the United States Mail, postage prepaid and addressed as follows

Scott T Justice, Esquire
Horger, Horger & Justice, L L C
Post Office Box 518
Orangeburg, South Carolina 29116

This 7th day of June, 2005

Paula Bregovi

Columbia, South Carolina

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT C/A NO 04-CP-40-1761
James "Cal" Bell, Othella Bernard, Katherina Bower, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L. Culbreath, William K. Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief, Plaintiffs, vs South Carolina Department of Corrections and Palmetto Unified School District No 1, Defendants	PLAINTIFFS' MOTION TO REMAND AND AND MEMORANDUM IN SUPPORT

INTRODUCTION

Plaintiffs are each professional, certified educators formerly employed in full-time instructional or administrative positions in the Palmetto Unified School District This unified school district was created by statute to serve inmates in the South Carolina Department of Corrections S C Code Ann. § 24-25-10, et seq Plaintiffs were each removed from their positions as a result of a reduction in force implemented effective June 1, 2003 Plaintiffs have exhausted all administrative remedies afforded to them and subsequently sought judicial review for reinstatement to their former positions of employment.

MOTION

By this motion, Plaintiffs seek an order remanding Plaintiffs' grievance appeals to the Office of Human Resources to be heard by the South Carolina State Employee's Grievance Committee pursuant to S C Code Ann § 1-23-380(A)(6) Plaintiffs previously filed a Petition for Judicial Review and Complaint on April 6 2004 and a subsequent Motion for Discovery on November 19, 2004 In an Order dated May 2, 2005 the Honorable G Thomas Cooper, Jr granted Plaintiffs Motion for Discovery as to all requested interrogatory responses, request for production of documents and depositions pursuant to the South Carolina State Employees Grievance Act, S C Code Ann § § 8-17-310 et seq By correspondence dated May 27, 2005, Defendants provided Plaintiffs a copy of a Motion for Reconsideration pursuant to Rule 60(b) of the South Carolina Rules of Civil Procedure Plaintiffs filed a Memorandum in Opposition to Defendants Motion for Reconsideration on June 7 2005 The parties are awaiting a decision by the Court on this motion as of the date of the filing of this Motion to Remand

MEMORANDUM IN SUPPORT

Plaintiffs filed the Petition for Judicial Review and Complaint in response to the Office of Human Resources denial of Plaintiffs' request for reconsideration dated March 22, 2004 This action was taken without affording Plaintiffs the opportunity to present sworn testimony, to cross-examine those parties responsible for terminating their employment or to review the requested documents Pursuant to S C Code Ann. § 8-17-340, the Office of Human Resources determined that there were no material facts at issue However throughout the administrative grievance process, the South Carolina Department of Corrections refused or failed to provide Plaintiffs access to information relevant to their claims that the Department of Corrections violated law in implementing the reduction in force which resulted in their separation from employment

PJ 678-1274
COMMITTEE S EXHIBIT
1C

In granting Plaintiffs' motion for discovery, the Court, in its Order of May 2, 2005 notes that the Supreme Court held that Article I, § 22 of the South Carolina Constitution requires an administrative agency to give its employees notice and an "opportunity to be heard" at some point before it makes a final decision Ross v Medical University of South Carolina, 328 S C 51, 68 492 S E 2d 62 71 (1997) In Ross, the Agency did afford the employee an opportunity to be heard In the present case, however, the Plaintiffs have been afforded no such opportunity In this context the Court found in granting Plaintiffs motion for discovery that the information requested is relevant to demonstrate whether Plaintiffs should be reinstated to their former positions Because material facts remain to be resolved, Plaintiffs seek the opportunity to be heard which is required by law and constitution

CONCLUSION

Plaintiffs seek a court order remanding their grievance appeals to the Office of Human Resources for hearing before the South Carolina State Employee s Grievance Committee as provided for in S C Code Ann § 1 23-380(A)(6)

GERGEL, NICKLES & SOLOMON P A

By _____

W Allen Nickles, III
Dona L Guffey
1519 Richland Street
Post Office Box 1866
Columbia, South Carolina 29202-1866
(803) 779-8080

Attorneys for Plaintiffs

Aug 15 2005
Columbia, South Carolina

CERTIFICATE OF SERVICE

I, Paula Bregovi, the undersigned employee of Gergel Nickles & Solomon P A , attorneys for the Plaintiff hereby certify that I have served the foregoing Plaintiffs Motion to Remand and Memorandum in Support, by depositing a copy of same in the United States Mail postage prepaid and addressed as follows

Scott T Justice, Esquire
Horger, Horger & Justice, L L C
Post Office Box 518
Orangeburg South Carolina 29116

This 19th day of August 2005

Paula Bregovi

Columbia, South Carolina

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

IN THE COURT OF COMMON PLEAS

James "Cal Bell et al
☒ Plaintiff

v

SC Department Of Corrections And Palmetto Unified School District
☐ Defendant

CASE NO
04-CP-40-1761

MOTION AND ORDER INFORMATION FORM AND COVER SHEET

Plaintiff's Attorney W Allen Nickles Bar No 4226 Address P O Box 1866 Columbia SC 29202 phone 779-8080 fax 256-1816 e-mail WANickles@gnslaw com other	Defendant s Attorney Scott T Justice Bar No Address phone fax e mail other

☒ **MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)**
☐ **FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)**
☐ **PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)**

SECTION I Hearing Information

Nature of Motion Motion to Remand
Estimated Time Needed 30 Court Reporter Needed ☐ YES / ☒ NO

SECTION II Motion/Order Type

☒ Written motion attached
☐ Form Motion/Order
I hereby move for relief or action by the court as set forth in the attached proposed order

[signature] 8/19/05
Signature of Attorney for ☐ Plaintiff / ☐ Defendant — Date submitted

SECTION III Motion Fee

☒ PAID – AMOUNT 25 00
☐ EXEMPT (check reason)
☐ Rule to Show Cause in Child or Spousal Support
☐ Domestic Abuse or Abuse and Neglect
☐ Indigent Status ☐ State Agency v Indigent Party
☐ Sexually Violent Predator Act ☐ Post-Conviction Relief
☐ Motion for Stay in Bankruptcy
☐ Motion for Publication ☐ Motion for Execution (Rule 69 SCRCP)
☐ Proposed order submitted at request of the court; or
reduced to writing from motion made in open court per judge s instructions
Name of Court Reporter
☐ Other

JUDGE'S SECTION ☐ Motion Fee to be paid upon filing of the attached order ☐ Other	JUDGE CODE Date

CLERK'S VERIFICATION

Date Filed

Collected by _____

☐ MOTION FEE COLLECTED _____

SCCA/233 (11-03)

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

COURT OF COMMON PLEAS
FIFTH JUDICIAL CIRCUIT

FILED
2005 SEP 15 AM 11 21
BARBARA A SCOTT
C C C & G S

James "Cal" Bell Othella Bernard Katherina Bower Linda M W Bratton, Ann T Bridges Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K. Dreyer Jacqueline D Farr Ruth Fritts Nancy Green, Etta Jane Jones, Geneva M Martin, Mary H McCabe Beverly McClanahan Max D Randolph Carolyn McIver Smith Maggie G Williams, and Paula Woodlief

Plaintiffs,

vs

South Carolina Department of Corrections and Palmetto Unified School District No 1,

Defendants

Civil Action No 04-CP-40-1761

DEFENDANTS' REPLY AND MEMORANDUM IN OPPOSITION TO PLAINTIFF'S MOTION TO REMAND

COME NOW Defendants by and through their counsel, Horger, Horger and Justice LLC, and file this Reply to Plaintiffs Motion to Remand

I PROCEDURAL BACKGROUND

Plaintiffs were separated from their employment with Defendants on June 12, 2003, due to a Reduction in Force Plan ("RIF") formally submitted by Jon Ozmint, the Director of the South Carolina Department of Corrections (SCDC) Subsequent to this separation, Plaintiffs filed administrative grievances with SCDC disputing their

separations of employment due to the RIF On June 16, 2003, SCDC denied Plaintiffs' grievances because the RIF plan and policy were consistently and properly applied

Following SCDC s denial of their grievances Plaintiffs filed grievance appeals to the State Office of Human Resources (' OHR) on June 20, 2003 OHR denied Plaintiffs' grievance appeals without a hearing and Plaintiffs filed a Petition for Judicial Review and Complaint on April 6 2004 Plaintiffs also filed a Motion for Discovery on November 19, 2004, which was granted by this Honorable Court on May 2, 2005 On May 27 2005, Defendants filed a Motion for Reconsideration of the Order granting discovery which is presently pending review

Procedurally Plaintiffs case is now pending judicial review of OHR s denial of their grievance appeals and also pending reconsideration of the Order granting discovery At this stage of review Plaintiffs' Motion for Remand is not ripe and this Court should deny their request.

II ARGUMENTS AND AUTHORITY

Plaintiffs seek judicial review of OHR's decision to deny their appeal without providing them a hearing before the OHR Employee Grievance Committee Plaintiffs rely on S C Code Ann § 1-23-380 (A) (6) to support their Motion for Remand S C Code Ann § 1-23-380 (A) (6) reads as follows

> "The Court shall not substitute its judgment for that of the agency as to the weight of the evidence on questions of fact. The court may affirm the decision of the agency or remand the case for further proceedings The court may reverse or modify the decision if substantial rights of the appellant have been prejudiced because the administrative findings inferences, conclusions or decisions are
> (a) in violation of constitutional or statutory provisions
> (b) in excess of the statutory authority of the agency
> (c) made upon unlawful procedure,
> (d) affected by other error of law,

(e) clearly erroneous in view of the reliable, probative and substantial evidence on the whole record, or
(f) arbitrary or capricious or characterized by abuse of discretion or clearly unwarranted exercise of discretion "

Plaintiffs argue that since this Court granted its Motion for Discovery that the issues should be heard before the Employee Grievance Committee Plaintiffs' argument assumes that the discovery sought will be entered into the record as evidence and that Plaintiffs are automatically entitled to a hearing without first following the procedures set out under S C Code Ann § 1-23-380 (A) (4)

S C Code Ann. § 1-23-380 (A) (4) however sets out that Plaintiffs must move the court to allow additional evidence and show to the satisfaction of the court that the additional evidence is material and that there were good reasons for failure to present it in the proceeding before the agency This Section reads as follows

> "If, before the date set for hearing, application is made to the court for leave to present additional evidence, and it is shown to the satisfaction of the court that the additional evidence is material and that there were good reasons for failure to present it in the proceeding before the agency the court may order that the additional evidence be taken before the agency upon conditions determined by the court The agency may modify its findings and decision by reason of the additional evidence and shall file that evidence and any modifications, new findings, or decisions with the reviewing court

Only after Plaintiffs have passed the test set out in this Section may this Court allow additional evidence be taken before the agency Even then, the language in this statute implies that this Court has the discretion to act and remand to OHR is not necessarily mandatory

In addition, Section (A)(4) does not state that Plaintiffs are entitled to a <u>hearing</u>, only that the court may order the additional evidence be taken before the agency Thus,

State OHR may consider the newly discovered material, but not in the context of a full evidentiary hearing

Accordingly, since the Parties have not fully engaged in discovery as ordered and Plaintiffs have not identified any new evidence to present to OHR, Plaintiffs Motion to Remand is improper and not ripe Plaintiffs must first identify the evidence they seek to present to OHR and then motion the Court to allow the evidence be presented to OHR. S C Code Ann § 1-23-380 (A) (4) Even then, Section (A)(4) does not dictate that OHR convene a full evidentiary **hearing** as Plaintiffs suggest

II CONCLUSION

For the foregoing reasons, Defendants respectfully request that this Court deny Plaintiffs Motion to Remand and move forward with addressing the merits of Plaintiffs Petition for Judicial Review

Dated this the 12 day of September 2005

Respectfully submitted,

HORGER, HORGER & JUSTICE, LLC

By _____

Scott T Justice, Esquire
Attorney for Defendants
160 Centre Street, NE, Suite A
P O Box 518
Orangeburg, SC 29116-0518
(803) 531-1700

I hereby certify that I have hand delivered mailed a true and correct copy of the within Motion/Pleading/Document to all counsel of record this 16 day of September 2005

HORGER, HORGER & JUSTICE LLC

By _____
Scott T Justice Esquire

STATE OF SOUTH CAROLINA	IN THE COURT OF COMMON PLEAS
	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND	
James "Cal Bell, Othella Bernard, Kathenna Bower, Linda M W Bratton Ann T Bridges Rance C Cobb Jeannie B Croxton, Bernetha L. Culbreath, William K. Dreyer, Jacqueline D Farr, Ruth Fritts Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodlief,	CA No 04-CP-40-1761
Plaintiffs,	**ORDER**
vs	
South Carolina Department of Corrections and Palmetto Unified School District No 1	
Defendants	

RICHLAND COUNTY FILED
2005 SEP -9 AM 10 25
RICHLAND CO C A & C S SCOTT

After careful consideration of the record in this case and the submissions of counsel, this Court is unable to discover any material fact or principle of law that either has been overlooked or disregarded and further finds no error of law or facts not appropriately considered Accordingly this Court hereby DENIES Defendant s Motion pursuant to Rule 60(b) SCRCP for reconsideration of this Court's Order of May 4, 2005 Pursuant to Rule 59(f), the Court is of the opinion that oral argument is not necessary

AND IT IS SO ORDERED.

G Thomas Cooper Jr
Presiding Judge, Fifth Judicial Circuit

September 8, 2005

FORM 4

9-13-05

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND
IN THE COURT OF COMMON PLEAS

James "Cal" Bell et al

PLAINTIFF(S)

JUDGMENT IN A CIVIL CASE

CASE NO 04-CP-40-1761

SC Dept. of Corr et al

DEFENDANT(S)

CHECK ONE

[ ] **JURY VERDICT** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered

[ ] **DECISION BY THE COURT** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered

[ ] **ACTION DISMISSED** (CHECK REASON) [ ] Rule 12(b) SCRCP [ ] Rule 41(a) SCRCP (Vol Nonsuit) [ ] Rule 43(k) SCRCP (Settled) [ ] Other _____

[ ] **ACTION STRICKEN** (CHECK REASON) [ ] Rule 40(j) SCRCP [ ] Bankruptcy [ ] Binding arbitration subject to right to restore to confirm vacate or modify arbitration award [ ] Other _____

RICHLAND COUNTY FILED
2005 SEP -9 P 10 25
CLERK OF COURT
SCOTT S

IT IS ORDERED AND ADJUDGED [✓] See attached order [ ] Statement of Judgment by the Court

Dated at _____ South Carolina this _____ day of _____ 20____

_____
PRESIDING JUDGE

This judgment was entered on the ____ day of _____ 20____ and a copy mailed first class this 9 day of Sept 20 05 to attorneys of record or to parties (when appearing pro se) as follows

W. Allen Nickles III

ATTORNEY(S) FOR THE PLAINTIFF(S)

Scott Justice

ATTORNEY(S) FOR THE DEFENDANT(S)

_____
CLERK OF COURT

SCRCP APP-24

SCRCP FORM 4 (Revised 7/00)

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE COURT OF COMMON PLEAS

received
9-27-05

JUDGMENT IN A CIVIL CASE

Case No 04-CP-40 1761

James "Cal" Bell, et al	**versus**	**South Carolina Department of Corrections and Palmetto United School District No 1**
Plaintiff		Defendant

2005 SEP 27 AM 10:07

CHECK ONE

[ ] **JURY VERDICT** This action came before the court for a trial by jury The issues have been tried and the verdict has been rendered

[ ] **DECISION BY COURT** This action came to trial or hearing before the court The issues have been tried or heard and a decision rendered

[ ] **ACTION DISMISSED** (CHECK REASON) [ ] Rule 12(b) SCRCP, [ ] Rule 41(a) SCRCP (Vol nonsuit) [ ] Rule 43(k), SCRCP(Settled), [ ] Other - _____

[ ] **ACTION STRICKEN** (CHECK REASON) [ ] Rule 40(j) SCRCP [ ] Bankruptcy [ ] Other _____

IT IS ORDERED AND ADJUDGED [ ] See attached order [X] Statement of Judgment by Court

Plaintiff's Motion to Remand, dated August 19, 2005, is denied

Dated at Columbia, South Carolina, September 23 2005 (Date) _____ (Judge)

This judgment was entered on the _____ day of _____, 2005, and a copy mailed first class this 26 day of Sept, 2005, to attorneys of record or to parties (when appearing pro-se) as follows

Attorney(s) for Plaintiff(s)
W Allen Nickles, III
Dona L Guffey

Attorney(s) for Defendant(s)
Scott T Justice

s/BARBARA A SCOTT
Clerk of Court

SCRP Form 4(Rev 2/96)

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
	C/A NO 04-CP-40-1761
James "Cal" Bell, Othella Bernard,)	
Katherina Bowyer, Linda M W Bratton,)	
Ann T Bridges, Rance C Cobb, Jeannie)	
B Croxton, Bernetha L Culbreath,)	
William K Dreyer, Jacqueline D Farr,)	
Ruth Fritts, Nancy Glenn, Etta Jane)	
Jones, Geneva M Martin, Mary H)	
McCabe, Beverly McClanahan, Max)	
D Randolph, Carolyn McIver Smith,)	
Maggie G Williams and Paula Woodlief,)	
)	
Plaintiffs,)	
)	PLAINTIFFS'
vs)	MEMORANDUM OF LAW
)	
South Carolina Department of)	
Corrections and Palmetto Unified)	
School District No 1,)	
)	
Defendants)	

INTRODUCTION

Plaintiffs are each professional certified educators formerly employed in full-time instructional or administrative positions in the Palmetto Unified School District ('District") This "unified school district" was created by statute to serve inmates in the South Carolina Department of Corrections (SCDC' or Department) (S C Code § 24-25-10 et seq) Plaintiffs were each removed from their positions as the result of a reduction in force implemented effective June 1, 2003 Plaintiffs exhausted all administrative remedies afforded to them and seek judicial review for reinstatement to their former positions of employment

Plaintiffs filed a Petition for Judicial Review and Complaint on April 6, 2004 By this Petition, Plaintiffs seek an order remanding their grievance appeals to the Office of Human

Resources ("OHR) to be heard by the South Carolina State Employees Grievance Committee pursuant to S C Code Annotated § 1-23-380(A)(6) Plaintiffs filed a Motion for Discovery on November 19 2004 In an Order dated May 2 2005, the Honorable G Thomas Cooper Jr , granted Plaintiffs motion as to all requested interrogatory responses requests for production of documents and depositions Defendant s Motion for Reconsideration was denied by Judge Cooper on September 8 2005

STANDARD OF REVIEW

Throughout the administrative grievance process, the SCDC failed to provide Plaintiffs access to information relevant to their claims that the Department violated law in implementing the reduction in force Nevertheless OHR denied Plaintiffs grievance without a hearing pursuant to S C Code Ann § 8-17-340 which applies only to cases which present no material factual issues In denying Plaintiffs' grievance, OHR relied upon its own prior approval of the Department s reduction in force plan and did not afford Plaintiffs access to depositions or other meaningful discovery [1]

In contrast to OHR, Judge Cooper compelled discovery on the ground that Article I § 22 of the South Carolina Constitution requires an administrative agency to give its employees notice and an "opportunity to be heard ' at some point before it makes a final decision, citing Ross v Medical University of South Carolina, 328 S C 51 68 492 S E 2d 62 71 (1997) In Ross, the agency

[1]Plaintiffs requested that OHR compel the SCDC to provide information and records regarding positions, vacancies, exemptions from the reduction in force and financial data Instead, OHR merely accepted responses from the Department which denied access to information that the Department deemed irrelevant or within its discretion The Department continued to resist discovery after suit was filed For example, the Department s Human Resources Director testified on June 21, 2006 that information regarding vacancies and new positions filled since the reduction in force is available This information was not provided in a timely fashion despite Judge Cooper s Order compelling production Near dep , pp 83 85-87 (Attachment 1 Tab A Hereafter, all attachments identified by Tab letter)

afforded the employee an opportunity to be heard Plaintiffs have been afforded no such opportunity Because material facts remain to be resolved Plaintiffs seek the opportunity to present their case to the State Grievance Committee

LEGAL ARGUMENT

When a reduction in force is used in a retaliatory manner or in violation of law, affected employees are entitled to relief Our Supreme Court has repeatedly held that a public employee cannot be deprived of a liberty or a property interest without due process As stated in Brown v S C State Board of Education, 301 S C 326 329, 391 S E 2d 866, 867 (1990) '[t]he right to hold specific employment and the right to follow a chosen profession free from unreasonable governmental interference come within the liberty and property interests protected by the Due Process Clause The Court held in Brown that when important issues turn on questions of fact, due process requires a full adversarial proceeding The Court further held that evidence used to prove the State s case must be disclosed to the individual so that he or she has an opportunity to show that it is untrue" 301 S C at 329, 391 S E 2d at 867

Where the actions of a public employer result in hardship such as loss of income or employment the Supreme Court has held that the employer must scrupulously conform to law and procedure In Johnson v Spartanburg County School District No 7, 314 S C 340, 44 S E 2d 501 (1994), the Court held that a school district could not reduce an administrator s term of employment or compensation without providing an opportunity to be heard The Court found this action to be in 'blatant violation of procedural protections established by the General Assembly' As a result,

the district was required to reinstate the benefits previously withheld [2] As set forth below the Department and District are required by law to treat educators according to a statutory unified school district. Failure to observe this requirement of uniformity by dividing the District into geographical areas and restricting bumping ' rights, is a violation of law which requires relief

Plaintiffs further contend that their selection for reduction in force was in retaliation for enforcing their right to be paid in compliance with state law and in violation of laws establishing a unified school district Abraham v Palmetto Unified School District No 1, 343 S C 36 538 S E 2d 656 (Ct App 2000) held that the Department and District are required by S C Code § 24-25-707(7) to provide additional compensation to instructors based upon the average of local school supplements throughout the state This resulted in substantial back pay and salary increases for all educators employed by the Department

Abraham emphasized the 'unified nature of the District which is a central issue in the Plaintiffs claims here For example Plaintiffs challenge the division of the "unified' district into geographical areas Pursuant to S C Code Ann § 24-25-10, the District is established within the SCDC as a special statewide unified district " The SCDC s drawing of geographic areas for bumping rights was not in keeping with the statewide nature of the District The District operates and is administered as a single entity Blanton dep , p 24 (Tab C) Nevertheless the person responsible for creating the geographic divisions failed to consider the statutes which establish a unified school district Near dep , pp 12-15 (Tab A) Moreover, dividing the District into geographic areas meant that teachers could not use seniority to bump (replace) more recently hired

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[2]Following the issuance of this opinion, the General Assembly enacted legislation removing administrative duties from statutory protection.

employees in other areas Near dep pp 22 23 33 (Tab A) As a result more senior educators lost their jobs Department Director Jon E Ozmint called this getting 'more bang for the buck Ozmint dep pp 41-42 (Tab B)

The SCDC submitted its reduction in force plan to OHR for procedural approval only On the same day that it was submitted OHR approved the plan The letter granting approval however, specifically informed the Department approval **does not** include the determination of the geographic locations in the competitive areas, competitive classes, competitive class series bumping rights, the positions to be eliminated or any exceptions included in the plan since these are solely the responsibility of the SCDC s management Justification for any exception should be retained by the Department ' (Tab D), See also, Near dep pp 69-71 (Tab A)

In addition to the SCDC s division of a legislatively established unified school district a material fact regarding the legitimacy of the reduction in force is presented by the lack of participation by the District and its Board in the process State law designates the duties of the District s Board and Superintendent S C Code Ann § 24-25-10 et seq These duties include responsibility for programming and budget issues A memo from District Superintendent Wendell Blanton to Board members dated April 7 2003 states [a]s you may have read in the newspaper we are experiencing a reduction-in-force action involving 87 education positions You will be provided more information on April 17, 2003, at the Board meeting (Tab E) Minutes from that meeting indicate 'Mr Blanton gave an overview of the agency reduction in force plan. Of the 148 positions eliminated, 84 are from the Division of Education (Tab F) No Board minutes prior to the reduction in force indicate any discussion of potential cuts in the number of educators and programs

Rather than participating as required by statute the Board received reduction in force information after the fact Superintendent Blanton indicated that he "didn't know of any of the specifics except I was hearing that the Division of Education would be heavily involved I felt it was judicial to get involved and try to save as much as I could ' Blanton dep pp 45-46 (Tab C) Moreover, Superintendent Blanton made clear his disagreement with the reduction in force in a written request to provide input in the pending cuts in educational programs and staff so that matching federal and grant funds would not be lost See, Memorandum dated March 18, 2003 from Superintendent Blanton to Director Ozmint (Tab G), Memorandum dated September 8 2003 from Felicia Poston to Wendell Blanton (Tab H) and Wendell Blanton dep pp 44 - 45 (Tab C) Superintendent Blanton was expressly concerned 'that they not cut. it in a way that would cause us to lose the federal money That just seemed to be a no-brainer to me Why would you want to lose the money? Blanton dep p 47 (Tab C)

As a result of court ordered discovery, Plaintiffs have obtained additional evidence which shows continuing retaliation against educators For example James 'Cal" Bell, lead Plaintiff in this action applied for a position of certified vocational teacher at the Tiger River Correctional Institution Mr Bell has sixteen years of experience as a certified vocational teacher, which includes his current service at Perry Correctional Institution Mr Bell was not selected for the position Instead Department records establish that Mr Bell's interview score was reduced so that the only other applicant would receive the position This applicant had no prior employment with the Department, no teaching experience and no certificate to teach See Affidavit of James "Cal Bell (Tab I), See also, Near dep, pp 46, 59-60 (Tab A), Application and Interview records of James ' Cal' Bell and Larry Yarbrough (Tab J(1) and J(2))

Mr Bell and others affected by the reduction in force were offered only entry level correction officer positions or were assigned non-certified positions with the same duties that they had previously performed as educators but for substantially less pay See, Affidavits of James Cal" Bell and Beverly McClanahan (Tabs I and K) It has also been discovered that the Department retained probationary grant and "pink slip' temporary employees in favor of educators separated by reduction in force These at-will employees are normally eliminated and their positions filled by permanent employees, such as Plaintiffs **before** a reduction in force is implemented In fact, this procedure was used by the Department in 2001, prior to Director Ozmint s appointment Near dep pp 26-28 (Tab A)

Of the 87 educators affected by reduction in force 78 were certified instructors or instructional supervisors (Tab L) Seven institutions eliminated all District instructional staff while others retained only part-time pink slip teachers (Tab Q) In fact Plaintiffs have learned that the Department shielded certain employees from reduction in force by reassignment and exempting positions These employees include non-certified teaching assistants Near dep pp 89-92 (Tab A)

An additional material fact for determination by the State Grievance Committee is presented by the disproportionate reduction of educators compared to the Department s overall budget In a memorandum to employees announcing the reduction in force, Director Ozmint cited the Department s 'financial crisis (Tab M) However prior to the reduction in force, education accounted for less than 4% of the total SCDC budget SCDC Memorandum dated September 8 2003 from Felicia Poston to Wendell Blanton (Tab H) Nevertheless, educators comprised 60% of the employees affected by the reduction in force

One rational explanation for the concentration of educators affected by the reduction in force is offered in the Affidavit of Max D Randolph (Tab R) In this Affidavit, Mr Randolph offers his

recollection of a discussion with Director Ozmint on April 11 2003 at approximately 1 30 p m This was after the reduction in force had been announced but before its implementation Mr Randolph suggested that the teacher separations could be handled through attrition or retirement He recalls the Director responding that teachers had sued the Department to get a raise and this was wrong He further recalls the Director stating that he could 'afford education on a budget of $300 million The Director does not acknowledge this conversation

A comparison of the SCDC s operating expenditures for fiscal years 2000-2004 to the District s expenditures for that same period could reasonably lead the Grievance Committee to conclude that there was an ulterior motive in selecting educators for separation from employment For example the SCDC s total expenditures for this five year period always exceeded $300 million (Tab N) During this same period District expenditures never exceeded $17 million (Tab O) [3] Additionally federal funds were available to the District for educational purposes (Tab P) Finally part of the funds used to pay Plaintiffs came directly through the Education Improvement Act and Education Finance Act These funds were not a part of the Department s annual appropriation and were available only to pay certified teachers Ozmint dep p 35 (Tab B)

Finally an additional material fact is presented by the Department's replacement of educators following the reduction in force. Documents recently provided by the Department reveal that of the eighty-seven educators affected by reduction in force more than eighty were replaced primarily by

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[3]This expenditure comparison was prepared by the District as information for Board members This document notes that in fiscal year 2001 (the highest expenditure by more than $2,000,000) "Teacher Lawsuit Settlement was paid out" This note further supports Plaintiffs position that their lawsuit to force the Department to comply with state law in setting their salaries was a consideration in the reduction in force

unclassified or temporary employees [4] Of the more than eighty employment actions identified, only four were offered to Plaintiffs in this case Moreover, the vast majority of positions are identified as 'unclassified even though the duties assigned may be of principal certified teacher and classroom teacher When viewed in the context of the Director s alleged statements and the failure to place Mr Bell in his former position, this record clearly supports remand to the State Employee Grievance Committee for findings on the legitimacy and motivation of the reduction in force which resulted in lost pay, benefits and retirement income for each of the Plaintiffs

CONCLUSION

For the reasons stated above there exist numerous issues of material fact which entitle Plaintiffs to a hearing before the State Employee Grievance Committee These issues of material fact include

1 Unjustified division of a legislatively established statewide district into eleven geographic units

2 Alleged retaliation against Plaintiffs for pursuing pay claims in court

3 Failure to place affected employees in vacant positions,

4 Shielding at-will temporary and grant employees from separation in favor of full-time educators

5 Conversion of education positions into unclassified positions with the same duties

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[4]On September 7, 2006 counsel for the Department provided documents including a complete list of all employees by name position and hire date that were assigned responsibilities that were performed by certified educators before June 1 2006' This information is provided at Tab S

6 Disproportionate number of educators affected by reduction in force in comparison to the Department as a whole

7 Disproportionate reduction in the education budget in comparison to the Department as a whole,

8 Targeting senior educators for reduction in force to obtain a bigger bang for the buck , and

9 Failure to include the District Superintendent and Board in the development and implementation of the reduction in force

Each of the above issues involve material factual questions which can only be resolved by affording Plaintiffs a proper due process hearing before the State Employee Grievance Committee Accordingly, Plaintiffs request that this matter be remanded so that their rights may be vindicated

GERGEL, NICKLES & SOLOMON, P A

By _____

W Allen Nickles III
Dona L Guffey
1519 Richland Street
Post Office Box 1866
Columbia, South Carolina 29202-1866
(803) 779-8080

Attorneys for Plaintiffs

October 31, 2006
Columbia, South Carolina

CERTIFICATE OF SERVICE

I Paula Bregovi, the undersigned employee of Gergel, Nickles & Solomon, P A , attorneys for the Plaintiffs, hereby certify that I have served the foregoing Memorandum of Law, by depositing a copy of same in the United States Mail postage prepaid and addressed as follows

Lake Eric Summers Esquire
Malone, Thompson & Summers, LLC
1312 Gadsden Street
Columbia, South Carolina 29201-3002

This 31st day of October 2006

Paula Bregovi

Columbia South Carolina

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
	C/A NO 04-CP-40-1761
James "Cal" Bell, Othella Bernard,)	
Katherina Bowyer, Linda M W Bratton,)	
Ann T Bridges, Rance C Cobb, Jeannie)	
B Croxton, Bernetha L Culbreath,)	
William K. Dreyer, Jacqueline D Farr,)	
Ruth Fritts, Nancy Glenn, Etta Jane)	
Jones, Geneva M Martin, Mary H)	
McCabe, Beverly McClanahan, Max)	
D Randolph, Carolyn McIver Smith,)	
Maggie G Williams and Paula Woodlief,)	
)	ATTACHMENT 1
Plaintiffs,)	
)	TO PLAINTIFFS'
vs)	MEMORANDUM OF LAW
)	
South Carolina Department of)	
Corrections and Palmetto Unified)	
School District No 1,)	
)	
Defendants)	

ATTACHMENT 1

A John Near deposition excerpts

B Jon E Ozmint deposition excerpts

C Wendell Blanton deposition excerpts

D Letter dated March 28, 2003 to John Near from Chris Poore (with Competitive Areas and Geographic Divisions)

E Memorandum dated April 7, 2003 from Wendell Blanton to School Board members

F Palmetto Unified School District No 1 Board Minutes of April 17 2003

G Memorandum dated March 18, 2003 from Wendell Blanton to Jon Ozmint

H Memorandum dated September 8, 2003 from Felicia Poston to Wendell Blanton

I Affidavit of James "Cal" Bell

J Application and Interview records

(1) James Cal Bell

(2) Larry Yarbrough

K Affidavit of Beverly McClanahan

L Employees subject to RIF by institution, prepared by PUSD No 1

M Memorandum dated March 31, 2003 from Ozmint to all SCDC employees

N SCDC Operating Expenditures Fiscal Years 2000-2005

O Palmetto Unified School District No 1 Five Year Expenditure Comparison

P Education Federal Funding Comparison Fiscal Years 2002-2004

Q Institutions greatly reduced by RIF prepared by PUSD No 1

R Affidavit of Max Randolph

S Complete List of Employees by Name, Position and Hire Date

COPY

STATE OF SOUTH CAROLINA) COURT OF COMMON PLEAS
)
COUNTY OF RICHLAND) C/A #04-CP-40-1761

James Cal Bell, Othella Bernard, Katherina Bower, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams, and Paula Woodlief,

Plaintiffs,

v

South Carolina Department of Corrections and Palmetto Unified School District No 1,

Defendants,

DEPOSITION OF

JOHN NEAR

****

Wednesday, June 21, 2006
9 08 a m - 11 33 a m

The deposition of John Near, taken on behalf of the Plaintiffs at the law offices of Gergel Nickles & Solomon, P A , 1519 Richland Street Columbia, South Carolina, on the 21st day of June, 2006 before Margaret S Smith, Court Reporter and Notary Public in and for the State of South Carolina, pursuant to Notice of Deposition and/or agreement of counsel

identification purposes)

Q Mr Near, I'm going to hand you a package of documents that have been marked Exhibit Number One. And this is a printout of that chapter of Title 24 of the South Carolina code which relates to the Palmetto Unified School District Let me ask you first have you at any time had the opportunity to review these statutory materials?

A No, sir

Q You have or have not?

A No, sir

Q So would it be fair to say that at least in your participation in the reduction in force which affected the Palmetto Unified School District, you did not consult with this Code of Law?

A I was not aware of this of this Code of Law, no

Q Tell me what your role was in the reduction in force which was implemented at the Department of Corrections on June 1, 2003

A I guess in broad terms it was my responsibility to prepare the reduction in force plan, make sure that the plan, the policies, all of that

were submitted to the Office of Human Resources as required in regulation, conduct the reduction in force and just go through all of the all of the mechanics of a RIF

Q Can we agree that for purposes of our deposition when we make reference to RIF or reduction in force unless we specifically are using those terms generically, they'll apply to the June 1, 2003 Department of Corrections reduction in force? That's the only one we're talking about today?

A To my knowledge, yes

Q Among us we can agree that when we use that in the short term for that particular reduction in force is that fair?

A Yes

Q So I want to go through your duties here You say you planned and reviewed the policies which were submitted to the Office of Human Resources is that correct?

A Yes

Q Did anyone assist you in doing that?

A I had a number of people in my own department who assisted me with the preparation of the reduction in force, yes

Q Were those people under your supervision?
A Yes, sir
Q Who did you communicate with at the Office of Human Resources?
A I don't know if I can give you exact, specific names I would the one name that comes to mind is Chris Byrd who is an administrative manager at the Office of Human Resources, Sam Wilkins who is a director of Human Resources And there were a number of other people in the employee relations areas that I had met with
Q Would it be fair to say that these responsibilities had to do with the technical aspects of the reduction in force?
A I would say for the most part technical, yes But certainly, when you go through a reduction in force and you're talking about, you know, about the process, you certainly would talk about more than just the technicalities You'd certainly have discussions about what's involved in a RIF and how you go about it and what your plans are and all of that, yes
Q For example, did you create the geographical areas in which the Department of Corrections was divided for this reduction in force?

A Yes I did
Q Who did you consult with in making those divisions?
A I would say I consulted with the agency director, our Office of General Counsel, people within my own department, the Office of Human Resources
Q Did you consult with the superintendent of the school district?
A I would say I don't I don't think in the creation of competitive areas initially, but I met with him
Q Let's slow down What I had asked you about, and we'll get to competitive areas
A Okay
Q I said the geographic areas in which the department was divided I want to know who you consulted with in making those geographic divisions
A I guess, again, when you're talking about going through a reduction in force process, you know, certainly there are a lot of meetings that take place We certainly did meet with the superintendent of education And I can't honestly say at what point I specifically met

Q Well, what's not to agree with? Let's go over this one more time Let's make sure we understand each other Let's assume as the law says that this is a statewide unified school district Let's assume that between the two of us Will you do that?

A Okay

MR SUMMERS I'm going to object as to the premise and the form of the question, but obviously Mr Nickles can continue

Q So we have a single statewide school district and there is a reduction in force in that single statewide school district Let's assume that to be the case, okay? You have to answer

A Okay, yes

MR SUMMERS Same objection

Q Now, unless that school district is somehow divided up artificially, then I have the right to bump into any other school in which there's a position which I have seniority Would that be fair?

A If you are dividing the state into a single geographic area and you have a reduction in force and you wanted to have the ability to bump within that one geographic area, then yes

An individual could bump within that area
Q So if the General Assembly for the State of South Carolina, not John Near, created a single unified school district then the General Assembly has expressed its purpose to have all those individuals treated uniformly Would that be fair?
MR SUMMERS Objection as to the premise and to the form but Mr Near
A Again, I don't know that I could answer I couldn't speak for for what the General Assembly would intend or not
Q Well, you're familiar with the lawsuit that was brought by teachers of the Palmetto Unified School District to have their pay elevated to the statutory minimum, are you not?
A The agency did have a settlement on a lawsuit several years back, yes
Q And wasn't it the premise of that lawsuit that there was a single unified school district in which all teachers had to be paid on a similar basis?
MR SUMMERS Objection as to form Mr Near
A I don't know that I know the answer to that question

A Not that I recall
Q Did anyone on your administrative team ever indicate to you that they felt the teachers were being overpaid or paid disproportionate to their duties?
A Not that I recall
Q Do you know why pink slip employees would be retained over permanent employees?
A Well, if you're talking about specific incidences, I don't know I guess from a from a business standpoint, obviously a pink slip or temporary employee is an individual who's paid by the hour, does not earn benefits, and obviously the cost would be would be less
Q But every dollar you spend on a temporary employee is the same value as the dollar you spend on any other employee Would you agree with that?
A I don't know that I know that to be true, no
Q So you think that if you spend a dollar on a certified employee it cost you more than the dollar you spend on a temporary employee?
A No I didn't say that
Q Isn't it ordinarily the case in your business,

Mr Near, that before reduction in force is implemented, temporary, part-time and probationary employees are examined for elimination?

A I would say that that's certainly very common And the agency did do that

Q Well the agency did it in 2001, didn't it?

A Well, the agency eliminated a number of positions for several years prior to the reduction in force

Q But in this case, it's been brought to your attention, has it not, that certified teachers lost their positions while non-certified people were retained for providing instruction to the inmate You were aware of that, weren't you?

A If we had an individual who was a temporary employee and who was their employment continued, it would be because, number one, those individuals have no rights under reduction in force And that would be an agency decision whether to retain them or not I guess it would also I would also think that since they are temporary in nature, the agency would have the ability to eliminate those positions at any time or reduce their

hours I would think in a lot of cases it would probably be a good business decision

Q So were the individuals who were put on the street given the opportunity to take the position of the pink slip employee?

MR SUMMERS Objection as to form

A The reduction in force process does not allow an individual to bump into temporary positions

Q Let me make sure I understand You have a temporary employee who has no rights under state law, correct?

A That is well, as far as the reduction in force process yes

Q So you can remove that person regardless of reduction in force, correct?

A Correct

Q And there's nothing that would prohibit you as an agency from offering someone subject to reduction in force that position Nothing in law prohibits you from doing that, does it?

A Well, there the policy does not allow that So I guess since policy is founded in law, I guess you could say that, yeah, it's not permitted

Q Because you chose not to permit it at the

Q And the only people that I can bump are those people in my competitive area?
A In your geographic area, yes
Q So I have two confinements I have one, the competitive area to which I've been assigned, and secondly the geographic area to which I've been assigned Is that fair?
A I yes
Q So in your case, for example rather than assign a competitive area as certified teacher, the competitive areas are more narrowly defined isn't that correct?
A I don't know that they're more narrowly defined than anything else They're just they're just defined within the geographic area
Q Well, they're defined not just within the geographic area but by position as to competitive area That's different from geographic area, is it not?
A When you talk about bumping within individual's classifications, yes
Q And who designates those competitive areas? Is that you said the agency director did that, correct?
A It's authorized through agency policy by the

Correctional Institution, and Joe Counts, who is an associate warden at Tyger River And an independent observer is just an individual who sits in on the process and and more or less keeps track of the paper work and all

Q Is that someone from your office?

A No, sir Theresa Cobb is a is someone in the Department of Education or the Division of Education

Q It says here that both are to be interviewed Do you see that?

A Yes interviewed both applicants

Q What would the purpose of an interview be?

A The purpose of the interview is to obviously to interview the individuals who applied for the position and determine who they feel would be the best qualified to fill it based on the consensus of the three

Q Is there a scoring system that's used for the interviews?

A Yes

Q And is that generally relied upon in making an employment decision?

A Yes

(Plaintiff's Exhibit Number Four was marked for

A. Well again, it it's very common in going through applicant evaluations that there are changes Just like when, you know when we're writing, sitting at the table right now. There's scratch throughs and, you know, if something is added incorrectly, if something is done differently, if somebody re-evaluates what their thinking is, it's very possible

Q Do you have any explanation, Mr Near, sitting here today for the changes in Ms Burnette's scores other than to increase to decrease Mr Bell s score below that of Mr Yarborough? Do you have any other explanation?

MR SUMMERS Objection as to form

A I have I have absolutely no explanation because I wasn't a part of the interview process

Q But you're responsible for the integrity of the employment process, are you not?

A I would say yes

Q And so it doesn't disturb you that in a one on one process here where you have Mr Bell, who's a former employee, who's a plaintiff in this lawsuit, having his score changed to be below that of the only other applicant? That doesn't

disturb you at all?
MR SUMMERS Objection as to form
A It it again, I don t know anything about either one of these individuals experience or backgrounds or how well they would do or not do their job, nor does anybody here So I don't know that I could ever make that presumption, no I think you know, again that's why we have three people doing the interviewing and and they score them
Q And it only takes one of them to cook the books, doesn't it?
MR SUMMERS Objection as to form
A I have no answer to that question
Q Let's take a little break
(Off the record)
Q Mr Near, is it your experience that at the Department of Corrections application interview materials are often manipulated after the fact to achieve the desired result?
MR SUMMERS Objection as to form
A No That's not a I don't know that I have an answer to that question, no
Q It would not be right if that were the case, would it?

seen this document before?
A No Again, I have seen a number of documents, but I don't know that I specifically recall one that's legal, no
Q Well, let's look at interrogatory number four. Provide a complete list of all vacancies filled since the reduction in force Now, we've seen in your materials that have already been examined, for example, as to Mr Bell in Exhibit Number Five, the first page of that. You see that?
A Yes
Q There's a personnel history listed by position, start date and end date for that individual. You see that?
A Yes
Q You have that for each person employed by the Department of Corrections, don't you?
A Well we don't have one There would be one If you wanted that, you'd have to have that generated for that one, yes
Q The information is available to you is it not?
A It could be generated
Q Did the orders of the judge issued say only if it's convenient for you should you provide this

A-L-L you know the meaning of that word, don't you?

A I believe I do

Q It means every, doesn't it?

A I believe it does

Q It means each, correct?

A (Nods head affirmatively)

Q So this is a very simple statement Provide a complete list of all vacancies filled since the reduction in force That information is available through your records, is it not?

A It would have to be obtained through the records, yes

Q Number five, provide a complete list of all new positions approved since the reduction in force That again could be determined through your records, could it not?

A It could be determined if there were new positions that were approved Again, if you're talking what new positions, are you talking about new positions that the State of South Carolina approved for the agency? Are you talking about a position that the agency wanted to somehow change or or rebudget? Are you talking about something that somebody was in an

existing position and that changed? You know, again, I you know, a new position Generally, when someone asks me did the agency get new positions this fiscal year, I would say in the appropriations process did the agency get a new position

Q Well, was even that information provided in response to this discovery request?

A Well again I don't know what was provided to you

Q Well you can see what the answer is Documents or information in response to this interrogatory does not exist in current form Extensive programming of defendant's information bank will be required That doesn t provide any information, does it? It's an excuse

MR SUMMERS Objection as to counsel's characterization

Q It doesn't provide any information, does it?

A There's no information there, no

Q Number eight, provide a complete list of all reclassifications and promotions and transfers implemented by the Department of Corrections during the calendar years 2002, 2003 and 2004

Once again, that information is available within your system, is it not?

A If the agency knew exactly exactly what was provided and and they were able to go through and do the programming, they probably could

Q Number ten, provide a complete list of all employees indicating position and hire date assigned to the responsibilities that were performed by certified educators prior to reduction in force Did you consult with Mr Blanton or anyone in the Palmetto Unified School District in reference to this request?

A No I don't recall talking to him about it, no

Q And the same would be true for numbers eleven and twelve that you have not provided that information Your only response is the response which is in this document Is that fair to the best of your knowledge?

A To my knowledge, the information was provided, yes

(Plaintiff's Exhibit Number Thirteen was marked for identification purposes)

Q Mr. Near, I'm going to hand you a document

Drucker Deutschmann, D-E-U-T-S-C-H-M-A-N-N, deputy general counsel for the Department of Corrections, and ask if you're familiar with this document

A Again, same answer I may have seen it a few years ago, but I don't recall at the moment

Q Do you recall consulting with Ms Deutschmann in an effort to provide the information contained in this letter?

A I thin it's a reasonable assumption that I probably would

Q Why don't we do this If you would put the two documents side by side for me, please, Exhibits Number Thirteen and Fourteen And the first statement in Exhibit Number Thirteen is that the principal and special education teacher at Tyger River were not subject to reduction in force Do you see that?

A Yes

Q And you see the response that concedes that to be the case, and says it is the department's provision, it retains the right to make management decisions regarding administration of resources Do you see that?

A Yes

Q So it would have been a management decision to exclude these two individuals from the reduction in force?
A Yes
Q Was that your decision, or was that the agency director's decision?
A That would be the agency director's decision.
Q The second assertion is that a reorganization took place prior to the first reduction in force that shifted high ranking administrators, provided some promotions prior to the first wave of reduction in force And once again, you see the answer the Department of Correction retains the right to make management decisions regarding administration of process?
A Yes
Q Would that have been the agency director's decision?
A Ultimately would be his his direction, yes
Q Third, three division directors, Richard Bazzle, B-A-Z-Z-L-E, Bernard Mackey and Judy Anderson received demotions but kept their salaries without confinement in competitive areas done a few days before reduction in force was announced Once again, would that have

been the executive director's decision?
A Yes
Q In sub (d) we assert that 87 educators were included in his headquarters count to give the impression that most of the cuts were management Did you participate in any decisions where to attribute the educators for purposes of reduction in force?
A No
Q In fact, the vast majority of the educators separated were in the individual institutions, were they not?
A I don't recall, but I would assume so, yes
Q Headquarters is located on Broad River Road?
A Yes
Q Sub (f), Glen Eaves an uncertified probationary employee did not lose his position And I had the name wrong, or Ms Guffey did It's Lyn Eaves, a non-certified teacher, holds a classified state position, and therefore was not a part of the RIF So it was regardless of what Mr or Ms Eaves did as a teacher assistant, she was shielded from the reduction in force?
A The position wasn't eliminated

Q Do you know whether under South Carolina Department of Education guidelines you can have a instructional assistant providing instruction without a certified supervisor?
A No
Q In sub (1) we noted that a teacher bumped into a math position then resigned within a few weeks and the position had not been filled The response is the department doesn't have to fill those positions if it wishes Do you see that?
A That's correct
Q Did you make any decisions on whether or not individuals certified in secondary education only would be allowed to bump individuals in elementary positions?
A No The bumping wasn't wasn't by primary or secondary It was strictly based on the certification that they held
Q Well, do you know the difference in being certified in primary and secondary education?
A I don't know that I do, no
Q Give me just a couple of minutes, if you would

(Off the record)

Q Mr Near, were you made aware that

COPY

STATE OF SOUTH CAROLINA) COURT OF COMMON PLEAS
)
COUNTY OF RICHLAND) C/A #04-CP-40-1761

James "Cal' Bell, Othella Bernard, Katherina Bower Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams, and Paula Woodlief,

Plaintiffs,

v

South Carolina Department of Corrections and Palmetto Unified School District No 1,

Defendants,

DEPOSITION OF

JON E. OZMINT

****

Wednesday, June 21, 2006
1 05 p m - 2 08 p m

The deposition of Jon E Ozmint, taken on behalf of the Plaintiffs at the law offices of Gergel, Nickles & Solomon, P A , 1519 Richland Street, Columbia, South Carolina, on the 21st day of June 2006 before Margaret S Smith, Court Reporter and Notary Public in and for the State of South Carolina, pursuant to Notice of Deposition and/or agreement of counsel

Q So that first line is a part of the amount of money that the General Assembly and whomever else at the state may direct funds to your department, correct?
A Yes, sir
Q Now, the lower line, the EFA and the EIA, while they are derivative of that amount are actually outside the state allocation to the Department of Corrections Is that true?
A Outside of the state appropriation yes, sir
Q To the Department of Corrections, okay. And similarly, federal funds are outside of the state's appropriation to the Department of Corrections?
A They're outside They're not independent of
Q Which leads us to the next issue And that is I'm going to show you is this Eighteen?
COURT REPORTER Yes, sir
(Plaintiff's Exhibit Number Eighteen was marked for identification purposes)
Q Take a look at that Exhibit Number Eighteen is another document provided by your department And this is represented to be a memorandum to you through Judy Anderson from Wendell Blanton, the superintendent of the

A That didn t have anything to do I never made that statement I certainly never attributed the cuts to anything that to any lawsuit or decision to sue In fact, I don't know at what point I know I found out about somebody informed me about the teachers suing and all that at some point before the RIF actually went into effect, but it wasn't anything that I mean we were far down the road to making the decision before I even knew that that had taken place And I mean it was common knowledge in the agency that when no that agency, again, was running a deficit And in years that that agency had run a deficit I did know that teachers because of the teachers pay scale had gotten an increase I don't think that that had anything to do that had nothing to do with the decision to RIF I imagine that that kind of policy decision well, that kind of policy decision does have an impact on how much bang you get for your buck In other words, for making cuts in the most efficient manner possible so that you get so that you keep as many people as you can, accomplish the missions that you absolutely

have to accomplish and save as much money as possible which was the parameter of you know, that was the dynamic we were trying to accomplish That was that was the goal we were trying to accomplish in making these RIFs So I guess those raises might have worked to the teachers disadvantage in the sense that it made it meant that by cutting by riffing one teacher, you were basically saving two correctional officers So in that respect

Q Is that like with the calculus that you used when you were going through this process?

A We used the parameter of insuring safety, trying to accomplish our absolute core, essential missions, those things that we must do and saving as much money as possible while having the most while having the least impact on the operations of the agency

(Plaintiff's Exhibit Number Nineteen was marked for identification purposes)

Q Fair to say that around March 18th, there abouts, in 2003 when Mr Blanton was sending this memo to you, you were in the final stages of bringing your reduction in force together?

STATE OF SOUTH CAROLINA) COURT OF COMMON PLEAS
)
COUNTY OF RICHLAND) C/A # 04-CP-40-1761

James Cal" Bell Othella Bernard Katherina Bower, Linda M W Bratton Ann T Bridges Rance C Cobb Jeannie B Croxton, Bernetha L Culbreath William K Dreyer, Jacqueline D Farr Ruth Fritts Nancy Glenn, Etta Jane Jones Geneva M Martin Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith Maggie G Williams and Paula Woodlief,

Plaintiffs,

v

South Carolina Department of Corrections and Palmetto Unified School District No 1,

Defendants

COPY

DEPOSITION OF

WENDELL BLANTON

****

Tuesday, December 20 2005
10 11 a m - 11 46 a m

The deposition of Wendell Blanton taken on behalf of the Plaintiff at Gergel Nickles & Solomon 1519 Richland Street, Columbia South Carolina on the 20th day of December 2005 before Sonya K Grice, Court Reporter and Notary Public in and for the State of South Carolina pursuant to Notice of Deposition and/or agreement of counsel

Q Okay Are there any geographical regions that are segregated and not under your purview?

A No I have more limited responsibility for programs that are offered by the adult ed local communities That essay is provided through contractual services and so you know I do not have the authority over those programs that I would over the programs funded through our agency or through federal funds received by our agency So I have direct supervisory responsibility through subordinates for all programs that are funded through our district

Q Right

A But programs that are funded through the county local adult ed programs, I have coordinating responsibility

Q Okay So for just facilitating those agreements?

A That s correct

Q Okay You talk about your responsibility to report to the Palmetto Unified School District Board as well as your division supervisor How many times a year does the Board meet?

A Four times a year, by law Each quarter Once each quarter

funding federal funding? And if you cut our budget, our state budget, you jeopardize our other funding, and you need an educator to advise you of how, you know, how this could be done and we could still keep the school district intact ' So it was my hope and I believe I did that, that I saved many jobs by asking to be involved And Judy Anderson facilitated that and got the Director you know, attuned to involving me, and I did become involved at that late date

Q Now, Judy Anderson is your immediate supervisor?

A Exactly

Q Or was at the time?

A At that time

Q Okay And when did you say you got wind of the RIF?

A Well, I mean you know, we all read the newspapers The whole agency was concerned about our budget shortfalls, and so I can't say when that actually started, but I think we began to hear that there was something coming and that it was coming, you know, in early April and I didn't know any of the specifics

except I was hearing that the Division of Education would be heavily involved, and perhaps we would lose all of our staff And so, at that point in time I felt it was judicial to get involved and try to save as much as I could

Q And what I m hearing from you is that no one came to you you went to your supervisor?

A Well, I'm not saying she didn t come to me She and I discussed - she was very supportive and wanted to be very helpful and she was concerned And so, you know we had discussions about my not being involved, and I expressed to her that I felt like somebody from our division that knew the District operation needed to be involved And she communicated that up, and it resulted in my getting an involvement at the very end

Q And who did you relay your advice to?

A I relayed it to the Director, to the Chief of Staff at that point in time, Richard Stroker of course, then, ultimately after meeting with them briefly, very briefly, as I recall I m saying, you know, ten or 15 minutes and I expressed my concern of what was going on and

you know, they did share with me that a reduction in force was coming and it would heavily involve education And so I expressed my concern that if they cut this school district the wrong way we would lose it all and that, you know, I wanted to preserve as much as possible And at that point in time, I was scheduled to meet with John Near Glen Franz, and Richard Stroker was in and out of the room frequently The Director did not participate directly in those sessions

Q But he did participate in the 10- to 15-minute discussion

A With me about, yeah, my concern that they not cut the whole District and that they not cut it in a way that you know would cause us to lose the federal money That just seemed to be a no-brainer to me Why would you want to lose the money? And we had to focus our services toward that population that generated the money and that was those under 21

Q Did they seem aware that they were jeopardizing federal funds?

A I think - I mean, I'm not sure that they were totally unaware of it I cannot say that they

STATE OF SOUTH CAROLINA

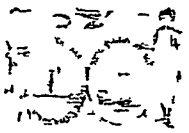
State Budget and Control Board

DIVISION OF BUDGET AND ANALYSES
OFFICE OF HUMAN RESOURCES

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HUGH K. LEATHERMAN, SR.
CHAIRMAN, SENATE FINANCE COMMITTEE

ROBERT W. HARRELL, JR.
CHAIRMAN, WAYS AND MEANS COMMITTEE

FRANK W. FUSCO
EXECUTIVE DIRECTOR

March 28 2003

Mr John Near
Director of Human Resources Management
South Carolina Department of Corrections (SCDC)
4444 Broad River Road
Post Office Box 21787
Columbia, South Carolina 29221-1787

Dear Mr Near

Your reduction-in-force (RIF) plan for the Department of Corrections (SCDC) eleven (11) competitive areas has been reviewed As part of the plan, we reviewed the following components the plan the competitive areas diagram, the listing of competitive job classifications and job classification series, the 'Listing of Positions Being Eliminated and the Employees Eligible for Bumping in Each Competitive Area", and the sample letter to employees in positions being eliminated. In light of your assessment that the Department's current organizational charts may not be completely up-to-date, we understand that the 'Listing" includes all employees in each competitive area and each competitive class and class series included in the reduction in force plan. We used this information to conduct our review

Based on the information you submitted, it appears that the plan is procedurally correct. The Office of Human Resources' approval of the procedural correctness indicates only that the required elements of the RIF plan are present and in accordance with the Department's RIF Policy/Procedure Our approval does not include the determination of the geographic locations in the competitive areas, competitive classes competitive class series, bumping rights, the positions to be eliminated, or any exceptions included in the plan, since these are solely the responsibility of SCDC management. Justification for any exception should be retained by the Department.

FAX (803) 737-0968

In accordance with SC Code of Laws Ann §8-11-185 (1976 & 2002 Supp) any state agency implementing a RIF must report information pertaining to employees affected by a RIF to the Office of Human Resources to be included in the RIF applicant pool State law also requires agencies to consult the RIF applicant pool and give priority consideration to employees affected by a RIF when seeking to fill vacancies For this purpose, the RIF applicant pool may be accessed through the web-site *www state sc us/ohr/rif* Should you have questions about these requirements, please call Bob Karel at 734-0980

If I can be of further assistance, please give me a call at (803)737-0952

Sincerely,

Christopher Poore

Christopher Poore
Human Resources Consultant

DEPARTMENT OF CORRECTIONS

REDUCTION-IN-FORCE - COMPETITIVE AREAS

Competitive Area	Location(s)
1	All Broad River Road Complex Institutions and Divisions Watkins Pre-Release Center Manning Correctional Institution
2	Wateree River Correctional Institution Lee Correctional Institution Palmer Pre-Release Center Turbeville Correctional Institution
3	Catawba Pre Release Center
4	Evans Correctional Institution
5	Kershaw Correctional Institution
6	Coastal Office Coastal Pre-Release Center Lieber Correctional Institution MacDougall Correctional Institution
7	Allendale Correctional Institution
8	Ridgeland Correctional Institution
9	Lower Savannah Pre-Release Center Trenton Correctional Institution
10	Leath Correctional Institution McCormick Correctional Institution
11	Appalachian Office Northside Correctional Institution Livesay Pre-Release Center Tyger River Correctional Institution Perry Correctional Institution

Locations of Existing Institutions and Centers

*23 Greenville County
1 Perry Correctional Institution

*42 Spartanburg County
2 Livesay Pre Release Center
Northside Correctional Institution
3 Tyger River Correctional Institution

*46 York County
4 Catawba Pre Release Center

*29 Lancaster County
5 Kershaw Correctional Institution

*24 Greenwood County
6 Leath Correctional Institution

*33 McCormick County
7 McCormick Correctional Institution

*19 Edgefield County
8 Trenton Correctional Institution

*02 Aiken County
9 Lower Savannah Pre Release Center

*40 Richland County
10 Broad River Correctional Institution
Campbell Correctional Institution
Goodman Correctional Institution
Kirkland Reception & Evaluation Center
Stevenson Correctional Institution
Walden Correctional Institution
Watkins Pre Release Center
Women s Correctional Institution
11 Manning Correctional Institution

*43 Sumter County
12 Wateree River Correctional Institution

*31 Lee County
13 Lee Correctional Institution

*35 Marlboro County
14 Evans Correctional Institution

*21 Florence County
15 Palmer Pre Release Center

*14 Clarendon County
16 Turbeville Correctional Institution

*08 Berkeley County
17 MacDougall Correctional Institution

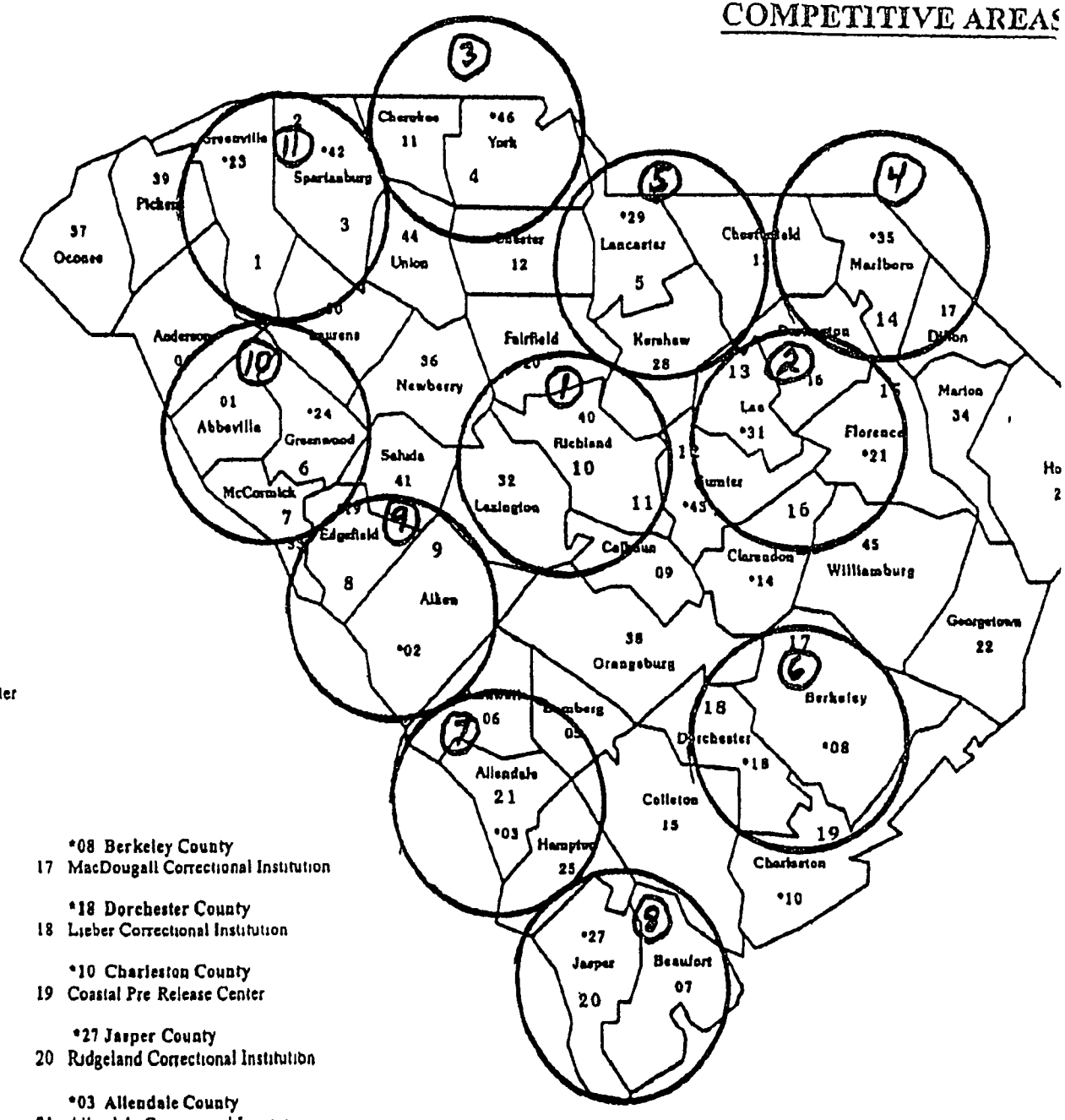
*18 Dorchester County
18 Lieber Correctional Institution

*10 Charleston County
19 Coastal Pre Release Center

*27 Jasper County
20 Ridgeland Correctional Institution

*03 Allendale County
21 Allendale Correctional Institution

COMPETITIVE AREAS



2190
SCDC
0158

South Carolina Department of Corrections

MARK SANFORD Governor
JON E OZMINT Director

TO Board of Trustees
Palmetto Unified School District

FROM Wendell J Blanton, Superintendent

SUBJECT School Board Meeting Scheduled for April 17, 2003

DATE April 7 2003

It has been determined that five of nine board members will not be able to attend the school board meeting planned for April 17 2003 at MacDougall Correctional Institution. This means that we would not have a quorum. After conferring with Jim Harvey Chairman, I am notifying you that we will return to our usual meeting place in the SCDC Headquarters Building Rooms 216 – 217 We will meet at 10 00 a.m. on April 17 2003 If a quorum is not present we cannot take official action but can share information. In the hope that a quorum is possible in our usual meeting place, I am attaching an agenda for this meeting The minutes of our previous meeting are also attached

As you may have read in the newspaper we are experiencing a reduction-in-force action involving 87 education positions You will be provided more information on April 17, 2003

Please join us if at all possible If you are unable to attend please notify Teresa Cobb at 896-1568

Wendell J Blanton

WJB tc

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

PALMETTO UNIFIED SCHOOL DISTRICT NO. 1
Minutes of Board Meeting

April 17, 2003

Board Members Present

Jim Harvey
Earl Brown
Les Levy
Carolyn Williams

Staff Present

Wendell Blanton
Hoyt Sharpe
Teresa Cobb

Others Present

Felicia Poston

The meeting was called to order at 10 00 a.m. and Mr Earl Brown gave the invocation.

The members that were present approved the minutes from the previous meeting

Mr Harvey informed the Board that, since there was not a quorum present any matters that needed action would be deferred until the next meeting All agreed

Mr Harvey asked Mr Blanton to give a superintendent's report. Mr Blanton passed out the Agency Organizational Chart (see attached) Mr Blanton told the Board that Ms Anderson, Director of Program Services had been reassigned to be the warden at Camille Graham Correctional Center He understands that the staff at the institution is very pleased to have Ms Anderson especially since she is very supportive of programs. He said that he was very appreciative of all the support that Ms Anderson gave education over the past several months. The new Acting Director for the Division of Programs and Services is Ms Geraldine Miro Mr Blanton said that Ms Miro would be responsible for several additional divisions He thinks this may be an advantage because she is over other divisions that Education deals with on a regular basis

Mr Blanton handed out copies of the Mission Statement (see attached) He reminded the Board that he had asked for input from them at the last meeting. He also had asked for input from the principals and educational coordinators The statements were compiled and the principals and educational coordinators voted on the one they preferred. The statement presented to the Board members won by a landslide He will present it at the next meeting to be officially accepted by the Board as our mission statement

Mr Harvey asked Felicia Poston to give a budget update Ms Poston handed out the Third Quarter Projected Budget Compared to Year-to-Date Expenditures report (see attached) She gave an overview of the report

Mr Blanton suggested that, since there was not a quorum present, the election of officers should be deferred until the next meeting Mr Levy asked if Evelyn Segui would accept the position of Chairman for next year Carolyn Williams offered to call her

Mr Blanton gave an overview of the agency s reduction in force plan. Of the 148 positions eliminated 84 are from the Division of Education. He provided a copy of the document of notification provided to employees (see attached) Mr Blanton handed out a list of employees that were notified that their jobs had been eliminated (see attached) He explained that some of these employees would have bumping rights The reduction-in-force process was in the early stages He provided a list of employees at institutions not greatly affected by the RIF (see attached) He also provided a list of remaining staff (SCDC and county funded programs) available at the institutions greatly affected by the RIF (see attached)

Board members expressed great regret that our educational mission had been negatively affected in this manner

Meeting was adjourned at 11 10 p m.

Respectfully submitted,

Teresa Cobb

Reviewed By Wendell J. Blanton
Wendell Blanton, Superintendent

PALMETTO UNIFIED SCHOOL DISTRICT
Projected Budget Compared to Year To-Date Expenditures
FY 2002 2003
Third Quarter
04/17/03

Program	2002-2003 Projected Expenditures Through 6/30/03	Actual Expenditures Through 03/31/03	Percent of Available Funds Used to Date	2002 2003 Funds Available	Projected Expenditures vs. Funds Available
STATE					
Administration	191 264	164 183			
Library Services	510 037	437 659			
Occupational Educat on	2,040 150	1 358,224			
Guidance	510 037	409 623			
Academic	2,613 942	1 964 642			
Special Education	63 755	60,527			
School Admin stration	446 283	345,515			
Employe Contributions	2,142,139	1 600 558			
TOTAL STATE FUNDS	8 517 627	6 340 933	91%	6 954 812	(1 562 815)
EFA					
Administration	18 333	8 991			
Library Services	109 995	82,827			
Occupational Education	439 981	315,421			
Guidance	148 660	103 772			
Academic	879 961	657 778			
Special Education	91 663	68,339			
School Administration	146 660	106,442			
Employer Contributions	636 932	278 507			
TOTAL EFA FUNDS	2 470 184	1 622,078	57%	2 864 113	393 929
EIA					
Administration	1 946	897			
Library Services	31 130	23,907			
Occupational Education	95,337	72,502			
Guidance	38 913	31 111			
Academic	179 000	137 314			
Special Education	11 674	9 648			
School Administration	31 130	25 621			
Employer Contributions	42 231	64 345			
TOTAL EIA FUNDS	431 362	365 343	85%	431 362	(0)
FEDERAL					
Admin stration	10 000	4,304		10 000	
Library Services	8 286	7 615		8 286	
Occupational Education	226 679	95 463		427 409	
Guidance	0	0		0	
Academic	1,579 144	653,900		1 779 144	
Special Educat on	165 897	57 797		165 897	
TOTAL FEDERAL FUNDS	1 990 006	819,080	34%	2 ,90 736	400 730
OTHER					
Administration	7 944	5 098		101 447	
Library Services	26 075	17 016		28 075	
Occupational Education	163 150	112,522		163 150	
Guidance	500	0		500	
Academic	238 120	127 199		236 120	
Special Education	1 150	1 099		1 150	
School Administration	21 153	15,207		21 153	
Employer Contributions	0	0		0	
TOTAL OTHER FUNDS	456,092	278 139	51%	549 595	93 503
EFA Carryover Funds Available				94 284	94 284
TOTAL ALL FUNDS	13 865,271	9 425,572	71%	13 284 902	(580 369)
Less. Federal Funds Projected to be Carried Over or Returned					(400 730)
Less EFA/EIA Balance to be carried forward for 2003-2004					(393 929)
TOTAL PROJECTED BALANCE FOR 2002-2003					(1 375 027)

EFA Carryover that has been budgeted is included in this figure
Othe 2002 2003 Budget includes ABE State EIA equipment, EFA Carry Over budgeted

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

- MEMORANDUM -

TO Jon Ozmint, Director

THROUGH Judy Anderson, Director for Program Services

FROM Wendell Blanton, Superintendent
Palmetto Unified School District No 1

SUBJECT Budget Issues

DATE March 18 2003

I recognize that you and the agency are faced with very difficult decisions I appreciate Ms Anderson and you giving me the opportunity through this memo to provide input and express my concern

Due to the severity of the budget crisis, I understand from media reports that the elimination of all educational programming is a possibility If this is necessary, input from the Division of Education is a mute point However please consider carefully the items outlined on the attach fact sheet I am sure you know that there will be difficult security political, and legal ramifications of this course of action.

If, however, a partial cut of educational programs is the ultimate outcome it is very important that the decision as to what portion is cut has total input from the leadership of our School District It is very important that we protect as much of our federal funding and school district formula funding as possible Due to the complications of school regulation, accreditation standards federal program requirement, etc , wise decisions related to a partial cut can only be made by those knowledgeable and experienced in dealing with these issues

Under the partial cut scenario, I would suggest that the Division of Education be given parameters as to the level of cut required and that we then provide input as to how the cut could be accomplished with the least possible harm to our programs and other funding sources

S/ Wendell Blanton
Wendell Blanton

WB mwd

FACT SHEET ON EDUCATIONAL PROGRAMS
Palmetto Unified School District
South Carolina Department of Corrections

School programs provide meaningful activity and supervision to about 5 250 inmates for major portions of the day This means that other agency employees are freed from supervisory responsibilities for these inmates during these time periods

Every dollar spent on education returns more than two dollars to the citizens in reduced prison cost according to a recent recidivism study funded by the U S Department of Education (See News and Notes Correctional Education Association, Volume 24 Number 1 January 2002 Page 1 For additional information see Three States Recidivism Study at www ceanational org)

Currently SCDC pays for about 60% of the cost of education with school district and federal funds paying for 40% Due to accreditation standards maintenance of effort requirements etc the Agency will lose the 40% if it fails to fund the 60%

Idleness is destructive to human growth and mental stability Educational programs in prison engage inmates in positive thought patterns and activities thereby reducing anger and violence

Education programs provide inmates with a realistic hope for a better life without crime Hopelessness produces desperation and deviant behavior

The schools of the Department of Corrections (Palmetto Unified School District) received an Absolute Rating of 'Excellent and an Improvement Rating of 'Excellent" on the school report card issued in November 2002

Palmetto Unified School District was recognized by the State Board of Education and the State Department of Education as a Gold Award Winner for 2002 – 2003

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO Wendell Blanton

FROM Felicia Poston

SUBJECT Education Funds

DATE September 8 2003

As you requested, the percentage of agency state funds spent on education are as follows for the current fiscal year and the three years prior

Fiscal Year	Percentage	Total Education State Funds Expended	Total Agency State Budget
00-01	3.39%	$ 11,328,041	$ 333 680 701
01 02	3 22%	9 219,806	286 045 254
02-03	3 51%	8,920,849	254,457,717
03-04	1 19%	3 055,190	257,808,695

This information is based on figures given to me by the budget office compared to year-end school board reports

TO- Gerri Miro

FOR Information

Education is now only 1 19% of the agency s budget. All this money goes to salaries and fringes We also have available about $6 million in grant and other educational funding (See attached) The $6 million will be lost if we lose the $3 million I would hope the agency would look outside of education if we have any additional cuts Education has taken its hit Please help us get this message out

S/ Wendell Blanton
Wendell Blanton 9/12/03

SCDC
0165

8/21/03
PALMETTO UNIFIED SCHOOL DISTRICT
Projected Budget versus Funds Available
FY 2003 2004

Program	2003-2004 Projected Expenditures Through 6/30/04	03-04 Funds Available	Projected Balance
STATE			
Administration	177 884		
Library Services	273 959		
Occupational Education	651 469		
Guidance	139 134		
Academic	888 713		
Special Education	81,587		
School Administration	169 974		
Employer Contributions	881 607		
Total STATE	3,264 327	3 055 190	(209 137)
EFA			
Administration	34,288		
Library Services	114,286		
Occupational Education	445 783		
Guidance	87,211		
Academic	989 403		
Special Education	92,166		
School Administration	121,305		
Employer Contributions	619 038		
TOTAL EFA Budgeted	2,503,478	2 966 359	462,881
EIA			
Administration	0		
Library Services	22,316		
Occupational Education	66 119		
Guidance	21 772		
Academic	146 070		
Special Education	13 037		
School Administration	21 672		
Employer Contributions	107 665		
Total EIA Budgeted	398 651	442,124	43 473
FEDERAL			
Title V	7 312	7,312	
Title I	919 000	1 155 594	
Occ Ed	57 196	57 196	
IDEA	117 000	224,257	
Staff Dev	0	0	
Post Secondary	159 624	809 786	
ABE	0	0	
Title II NCLB	0	0	
Cap Bldg & Imp	0	0	
TOTAL FEDERAL	1 260 132	2,254 145	994 013
EFA CARRYOVER ABE STATE, and EIA EQUIPMENT			
Administration	22 371	22,371	
Library Services	25 222	25,222	
Occupational Education	114 485	114 485	
Guidance	0	0	
Academic	169 647	169 647	
Special Education	384	384	
School Administration	23 491	23 491	
Total Other Budgeted	355,600	355,600	0
EFA CO Funds to be set up		339 780	339 780
TOTAL ALL FUNDS	7 782,188	9 073 418	1 631 010
Less Federal Funds Projected to be Carried Over			(994 013)
TOTAL PROJECTED BALANCE FOR 2003 2004			636 997

SCDC
0166

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND James "Cal" Bell, Othella Bernard, Katherina Bower, Linda M W-Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K. Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams and Paula Woodhef, Plaintiffs, vs South Carolina Department of Corrections and Palmetto Unified School District No 1, Defendants	IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT C/A NO 04-CP-40-1761 AFFIDAVIT OF JAMES "CAL" BELL

James Cal Bell being first duly sworn deposes and says

1 I was separated from employment with the Palmetto Unified School District (PUSD) No 1 and the South Carolina Department of Corrections (SCDC) due to a reduction in force effective June 1, 2003

2 I was subsequently hired by the SCDC as a Program Coordinator I with the same job duties and responsibilities as my position of Vocational Carpentry Teacher prior to the reduction in force

3 Program Coordinator I is paid under a state pay band and is approximately $13,000 less than my salary prior to the separation and approximately $17,000 less than the current teacher pay schedule for my years of experience

4 I applied and interviewed for a teaching position at Tiger River Correctional Institute that used the teacher pay schedule in February 2006 I was the only employee applicant as well as the only applicant previously affected by the June 1 2003 Reduction in Force. I was not hired, but based upon information and belief the

applicant hired by the SCDC did not have teaching experience or a teaching certificate I hold a current certificate and have sixteen (16) years of teaching experience

Further affiant sayeth not

James "Cal" Bell

Sworn to and subscribed before me
this 17th day of July, 2006

Notary Public for South Carolina
My commission expires May 17, 2015

PORT NO 01 SOUTH CAROLINA DEPARTMENT OF CORRECTIONS 02/09/06 PAGE 1

APPLICANT REFERRAL REPORT

SJ0000J
ISITION 015093 DATE OPENED 01/26/06
OT 0061 DATE CLOSED 02/08/06
ASS UB04 VOCATIONAL TEACHER
IDGET UNIT 31181 TYGER RIVER CORRECTIONAL INSTITUTION

ME	JAMES C BELL			AVAILABLE	100%
DDRESS	407 BELL RD			SHIFT REQ	A
TY	DONALDS	STATE SC ZIP 29638	SCDC BAND/LEVEL		05 B
ME	864-456-3202	OFFICE 803-896-0000	LICENSE STATE/NUM/CLASS		SC 0004514327 A

EMERGENCY RESPONSE TEAM N

EDUCATIONAL HISTORY

INSTITUTION	TYPE	DATE DEGREE OBTAINED	MAJOR	DEGREE TYPE
WARE SHOALS	HS			DIPLOMA

EMPLOYMENT HISTORY

EMPLOYER	POSITION	START DATE	END DATE	WKLY HRS	TERMINATION REASON
SCDC-PERRY CORRECTIONAL INSTIT	PROGRAM COORDINATOR	01/17/06	PRESENT	40 0	
SCHOOL DIST OF GREEN	VOCATIONAL-BUILDING	08/16/04	07/01/05	32 0	
GENERATIONS GROUP HO	VOCATIONAL CARPENTRY	08/03/03	08/16/04	32 0	ACCEPT PERMANENT FULL-TIME JOB
SCDC-PERRY CORRECTIONAL INSTIT	VOCATIONAL TEACHER	09/19/92	08/01/03	40 0	REDUCTION IN FORCE
BELL BROTHERS INC	PART OWNER R	08/01/83	09/19/92	50 0	SEEK OTHER EMPLOYMENT
SCDC-TYGER RIVER CORR INSTIT - BRYANT AND BATSON BU	VOCATIONAL TEACHER	02/01/80	08/01/83	40 0	SELF EMPLOYED
		00/00/00	PRESENT	40 0	TO ACCEPT OTHER EMPLOYMENT/OTHER STATE AGENCY

-- APPLICANT HAS NO SKILLS INVENTORY ON FILE --
-- APPLICANT HAS NO APPLICABLE TRAINING ON FILE --

2/15/06
Originally S24 being due to still in probationary status very difficult position to fill S/6 wants to Consider Policy Admin 11 26 requirement waived Connie Riley

SCDC 0169

2201

-748-

Division of Human Resource Recruiting and Employment Services Branch

APPLICANT EVALUATION

pplicant's Name James Bell

POSITION NO 015093

ite of Evaluation 2/28/06

Type of Evaluation

sition Title Vocational Teacher

(1)Screening ____ Oral Interview

reening Codes ____ ____ ____ ____

____ Paper Eval

tials of Panel Members

(2) ✓ Selection Interview

ructions Award points based on highest level for both education and related work experience (as it exceeds the SCDC Additional Requirements) for selection process ly The selecting official may identify up to eight(8) additional categories/points that are position related for evaluation of the candidate during the interview process aluation categories should not exceed 100 total possible points

		Points Possible	Points Awarded	Supportive Documentation/Comments
	Education Level (Selection Process)			
____	High School (Non Graduate)	0	____	
____	High School Graduation	1	1	
____	Associate Degree	3	____	
____	Bachelor's Degree	5	____	
____	Master's Degree	7	____	
	Related Experience (Selection Process) ** As it exceeds SCDC Additional Requirements**			
____	1 1 99 years of related experience	1	____	
____	2 - 3 99 years of related experience	2	____	
____	4 5 99 years of related experience	3	____	
____	6 7 99 years of related experience	4	____	
____	8 9 99 years of related experience	5	____	
____	10 + years of related experience	6	6	
____	~~Job Stability~~	~~10~~	8	
____	Flexibility	10	7	
____	Classroom Management	10	8	
____	Planning & Organization	10	7	
____	Cooperation	10	7	
____	Security	10	7	
____		____	____	
____		____	____	
	TOTAL POINTS	____	51	

Master File SCDC 16 83 (Rev September 2001)

SCDC 0170

22002

Division of Human Resources/Recruiting and Employment Services Branch

APPLICANT EVALUATION

pplicant s Name James C Bell

ate of Evaluation 2/28/06

osition Title Vocational Teacher

reening Codes ____ ____ ____ ____

itials of Panel Members RB

POSITION NO 015093

Type of Evaluation

(1)Screening ____ Oral Interview

____ Paper Eval

(2) ✓ Selection Interview

structions Award points based on highest level for both education and related work experience (as it exceeds the SCDC Additional Requirements) for selection process ily The selecting official may identify up to eight(8) additional categories/points that are position related for evaluation of the candidate during the interview process valuation categories should not exceed 100 total possible points

		Points Possible	Points Awarded	Supportive Documentation/Comments
	Education Level (Selection Process)			
____	High School (Non Graduate)	0	____	
✓	High School Graduation	1	1	
____	Associate Degree	3	____	
____	Bachelor's Degree	5	____	
____	Master's Degree	7	____	
	Related Experience (Selection Process)			
	** As it exceeds SCDC Additional Requirements**			
____	1 1 99 years of related experience	1	____	
____	2 3 99 years of related experience	2	____	
____	4 5 99 years of related experience	3	____	
____	6 7 99 years of related experience	4	____	
____	8 9 99 years of related experience	5	____	
✓	10 + years of related experience	6	6	
____	Job Stability	10	9	
____	Flexibility	10	8	
____	Classroom Management	10	9	
____	Planning & Organization	10	9	
____	Cooperation	10	8	
____	Security	10	8	
____		____	____	
____		____	____	
	TOTAL POINTS	____	58	

C Master File SCDC 16 83 (Rev September 2001)

SCDC 0171

2203

-750-

Division of Human Resources/Recruiting and Employment Services Branch

APPLICANT EVALUATION

pplicant's Name Carl Bell

ate of Evaluation 8/28/06

osition Title Vocational Teacher

reening Codes ___ ___ ___

itials of Panel Members [illegible]

POSITION NO 015093

Type of Evaluation

(1)Screening ___ Oral Interview

___ Paper Eval

(2)___ Selection Interview

structions Award points based on highest level for both education and related work experience (as it exceeds the SCDC Additional Requirements) for selection process ly The selecting official may identify up to eight(8) additional categories/points that are position related for evaluation of the candidate during the interview process valuation categories should not exceed 100 total possible points

		Points Possible	Points Awarded	Supportive Documentation/Comments
	Education Level (Selection Process)			
___	High School (Non Graduate)	0	___	
___	High School Graduation	1	1	
___	Associate Degree	3	___	
___	Bachelor's Degree	5	___	
___	Master's Degree	7	___	
	Related Experience (Selection Process) ** As it exceeds SCDC Additional Requirements**			
___	1 1 99 years of related experience	1	___	
___	2 3 99 years of related experience	2	___	
___	4 5 99 years of related experience	3	___	
___	6 - 7 99 years of related experience	4	___	
___	8 9 99 years of related experience	5	___	
___	10 + years of related experience	6	6	
___	~~Job Stability~~	~~10~~	7	
___	Flexibility	10	6	
___	Classroom Management	10	7	
___	Planning & Organization	10	5	
___	Cooperation	10	5	
___	Security	10	7	
___		___	___	
) ___		___	44	
	TOTAL POINTS	___	___	

: Master File SCDC 16 83 (Rev September 2001)

SCDC 0172

2204

-751-

WORK EXPERIENCE

Describe your work experience in detail Begin with your current or most recent job and continue back to the time that you left school Include military service (indicate rank and each position held) and job related volunteer work, if applicable Provide an explanation for any gaps in employment All information in this section must be complete including full dates of employment A resume may be attached, but not substituted for completion of this section Termination Reason Codes must be completed by using the Termination Reason Code Chart on page 10

Name of Present or Last Employer School District of Greenville County

Address 301 Camperdown Way - Box 2848 Greenville, SC 29602 2848 Phone (864) 241 3100

Job Title Vocational Building Const (Carpentry) Teacher

Number Supervised 50 Supervisor's Name Linda Barnett ph# (864) 243 5557 ext. 251

From 08/16/2004 To 07/01/2005 Hours Per Week 32 Salary 47,000

May we contact this employer? ☒ Yes ☐ No

Job Duties (give details)
To plan and implement a Vocational Carpentry program which would accommodate individual student needs and abilities
As a Voc Teacher I tried to provide the necessary training that the students would need, inorder to enter the construction indrustry and function as beginning carpenters.

Termination Code 090

Name of Present or Last Employer Generations Group Homes, Inc

Address _____ Phone (864) 243-5557

Job Title Vocational Carpentry Teacher

Number Supervised 50 Supervisor's Name Linda Barnett ph# (864) 243-5557 ext. 251

From 06/03/2003 To 08/16/2004 Hours Per Week 32 Salary 40,000

May we contact this employer? ☒ Yes ☐ No

Job Duties (give details)
The job at the School District of Greenville County and Generations Group Homes was the same job Generations hired me to teach Carpentry for them, but the school located at Generations was under the control of the Greenville County School District.

Linda Barnett was my direct supervisor under both employers

Termination Code 105

Address _____ Phone ( ) _____

Job Title Vocational Teacher

Number Supervised 40 Supervisor's Name Hoyt Sharpe

From 09/19/1992 To 06/01/2003 Hours Per Week 40 Salary 51,000

May we contact this employer? ☒ Yes ☐ No

Job Duties (give details)
I worked at Perry C I from Feb 1996 to June 2003 my direct supervisor was A Bratton and before her it was S Cook (retired). Before Perry C I, I worked at what is now Upper Tiger River C I.

Termination Code. 480

Name of Present or Last Employer Bell Brothers Inc

Address 517 Bell Rd. Donalds, SC 29638 Phone (864) 456-7527

Job Title Part Owner

Number Supervised 8 Supervisor's Name Gerorge Bell

From 08/xx/1983 To 09/19/1992 Hours Per Week 50 Salary 30 000

May we contact this employer? ☒ Yes ☐ No

Job Duties (give details)
As a part owner in a small construction company I was responsible for estimating job cost, submitting job proposals as well as supervising and/or performing the needed job task

Termination Code 005

Name of Present or Last Employer South Carolina Department of Corrections

Address _____ Phone ( ) _____

Job Title Vocational Teacher

Number Supervised 35 Supervisor's Name Glenn Davis

From 02/xx/1980 To 08/xx/1983 Hours Per Week 40 Salary 20,000

May we contact this employer? ☒ Yes ☐ No

Job Duties (give details)

Termination Code 090

Address _____ Phone (__) _____

Job Title _____

Number Supervised 0 Supervisor's Name James Beryant

From __/__/____ To 02/xx/1980 Hours Per Week 40 Salary _____

May we contact this employer? ☐ Yes ☒ No

Job Duties (give details)
I worked full time as a residential carpentry went to Tec at night.
During this time period, I also worked part time as a Buildind Construction Trades Teacher for Piedmont Technical College in Greenwood, SC

Termination Code 010

Name of Present or Last Employer _____

Address _____ Phone (__) _____

Job Title _____

Number Supervised _____ Supervisor's Name _____

From __/__/____ To __/__/____ Hours Per Week _____ Salary _____

May we contact this employer? ☐ Yes ☐ No

Job Duties (give details)

Termination Code _____

Name of Present or Last Employer _____

Address _____ Phone (__) _____

Job Title _____

Number Supervised _____ Supervisor's Name _____

From __/__/____ To __/__/____ Hours Per Week _____ Salary _____

May we contact this employer? ☐ Yes ☐ No

Job Duties (give details)

Termination Code. _____

South Carolina State Board of Education

Educator Certificate

JAMES CALHOUN BELL
407 BELL ROAD
DONALDS, SC 29638

Date Printed
03/27/02

INEZ MOORE TENENBAUM
STATE SUPERINTENDENT OF EDUCATION

THIS CERTIFICATE IS A COPY IF THE BLUE COLORED BACKGROUND IS ABSENT

2/1/2006

To Connie Riley
Recruiting and Employment Services

From James C Bell
Carpentry Program Coordinator
Perry C I

Subject Verification of job change consideration

Ms Riley I am currently a Vocational Carpentry Program Coordinator at Perry C I It has come to my attention that the Vocational Carpentry Teacher's job at Tiger River C I has been posted I am extremely interested in being considered for this position I made am effort to apply by phone (using my PIN #) on Sat the 28 of Jan I am writing this letter in order to confirm my request

Thank you for your time.

J Cal Bell
PCI # (864) 243-4700 ext. 194

Cc Hoyt Sharpe
Educational Services

SCDC
0177

APPLICANT REFERRAL REPORT

ARS3000J
POSITION 015093
SLOT 0061
CLASS UB04 VOCATIONAL TEACHER
BUDGET UNIT 31161 TYGER RIVER CORRECTIONAL INSTITUTION

DATE OPENED 01/28/08
DATE CLOSED 02/08/08

NAME LARRY E YARBROUGH
ADDRESS [redacted]
CITY STATE SC ZIP [redacted]
HOME OFFICE [redacted]

AVAILABLE 100%
SHIFT REQ A
SCDC BAND/LEVEL N/A
LICENSE STATE/NUM/CLASS SC 0001955460 D

EMERGENCY RESPONSE TEAM N

Self employed as builder since 1971. added to system CM

EDUCATIONAL HISTORY

INSTITUTION	TYPE	DATE DEGREE OBTAINED	MAJOR	DEGREE TYPE
UNION	HS			DIPLOMA

EMPLOYMENT HISTORY

EMPLOYER	POSITION	START DATE	END DATE	WKLY HRS	TERMINATION REASON
UNION CO SHERIFFS OF	DEPUTY	08/30/00	PRESENT	42 0	
CITY OF UNION	PUBLIC SAFETY OFFICE	10/20/88	08/20/98	42 0	SEEK OTHER EMPLOYMENT
TORRINGTON	MACHINIST	08/20/71	10/20/98	40 0	SEEK OTHER EMPLOYMENT
BUFFALO MILL	SHASSER TENDER	03/14/88	08/20/70	20 0	ACCEPT PERMANENT FULL-TIME JOB

SKILLS INVENTORY

SCORE YEARS	SKILL / TEST	TEST DATE
30 00	ARC WELDING	
30 00	SPECIALITY CONTRACTOR	
30 00	PROPANE TORCH WELDING	
30 00	HELIARC WELDING	
30 00	SHOP MACHINES	
28 00	MACHINIST	
25 00	WATERPROOFING-MASONRY	
30 00	WOOD FRAMING	
30 00	STAINING & LACQUERING	
30 00	FURNITURE REPAIR	
30 00	FORMWORK	
30 00	CHAIN SAW	
30 00	DRYWALL INSTALLER	
30 00	GUTTERING	
30 00	SHINGLE - ROOF SURVEY	
30 00	CONSTRUCTION - CARPENTRY	
25 00	TOOL AND DIE	
25 00	CONCRETE FINISH	
30 00	HAND POWER TOOLS	
20 00	CARPET SHAMPOOER	
30 00	GAS WELDING	
30 00	ELECTRICAL WELDING	
30 00	BRAZING WELDING	
30 00	LAYOUT & INSTALLATION-WELDING	
30 00	CEILING TILE SYSTEMS	
25 00	METALFLASHING	
30 00	WOOD SIDING	
30 00	FORMICA LAMINATING	
30 00	WATERPROOFING-CARPENTRY	
30 00	CONSTRUCTION ESTIMATING	
20 00	BOBCAT LOADER	
25 00	SANDBLASTING-MASONRY	
30 00	FLOOR TILE	
30 00	METAL SIDING/ROOFING	
30 00	STEEL STUD	
30 00	TRACTOR	
25 00	TILE MASONRY	
25 00	REPAIR - PLUMBING	
30 00	DOOR/WINDOW INSTALLATION	
30 00	VEGATABLE GARDENING	

11:30 Tues 2nd

ARS3000J

APPLICANT REFERRAL REPORT

1 00 SAWMILL OPERATION
20 00 BACK HOE
25 00 BRICK MASONRY
30 00 BLUEPRINT READING
7 00 CPR
7 00 BREATHALIZER OPERATOR
7 00 PR-24 CERTIFIED
20 00 FLOOR SCRUBBER
25 00 POWER STRING EDGER
1 00 CORRESPONDENCE-TYPING
1 00 WORDPERFECT
7 00 S C FIRE ACADEMY (COMPLETED)
7 00 OSHA TRAINING
7 00 ACCIDENT INVEST
-- APPLICANT HAS NO APPLICABLE TRAINING ON FILE --

25 00 FRONTEND LOADER OPERATION
25 00 CEMENT BLOCK MASONRY
25 00 CABINETMAKING
30 00 GLASS REPAIR
7 00 CRIME SCENE EVIDENCE COLLECT
7 00 RADIO DISPATCHER
7 00 REVOLVER QUALIFIED
20 00 WET DRY VACUUM
20 00 PRESSURE WASHER
20 00 ADDING MACHINE/CALCULATOR
20 00 SOLDERING - ELECTRONICS
7 00 FIREFIGHTER
7 00 TRAFFIC CONTROL
7 00 CRIMINAL INVESTIGATION

SCDC 0179 22111

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
Division of Human Resources/Recruiting and Employment Services Branch
APPLICANT EVALUATION

Applicant's Name harry Yarbrough
Date of Evaluation 8/28/06
Position Title Vocational Teacher
Screening Codes ____ ____ ____ ____
Initials of Panel Members GB

POSITION NO 015093
Type of Evaluation
(1) Screening ____ Oral Interview
____ Paper Eval
(2) ✓ Selection Interview

Instructions Award points based on highest level for both education and related work experience (as it exceeds the SCDC Additional Requirements) for selection process
) The selecting official may identify up to eight(8) additional categories/points that are position related for evaluation of the candidate during the interview process
aluation categories should not exceed 100 total possible points

		Points Possible	Points Awarded	Supportive Documentation/Comments
	Education Level (Selection Process)			
	High School (Non Graduate)	0		
✓	High School Graduation	1	1	
	Associate Degree	3		
	Bachelor's Degree	5		
	Master's Degree	7		
	Related Experience (Selection Process)			
	** As it exceeds SCDC Additional Requirements**			
	1 1 99 years of related experience	1		
	2 3 99 years of related experience	2		
	4 5 99 years of related experience	3		
	6 7 99 years of related experience	4		
	8 9 99 years of related experience	5		
	10 + years of related experience	6	6	
	~~Job Stability~~	~~10~~	9	
	Flexibility	10	9	
	Classroom Management	10	8	
	Planning & Organization	10	8	
	Cooperation	10	9	
	Security	10	9	
	TOTAL POINTS		59 GB	

Master File SCDC 16 83 (Rev September 2001)

SCDC 0180 22212

-759-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
Division of Human Resources/Recruiting and Employment Services Branch
APPLICANT EVALUATION

plicant's Name Larry Yarborough
te of Evaluation 2/28/06
sition Title Vocational Teacher
ening Codes ____ ____ ____ ____
tials of Panel Members HRC

POSITION NO 065062
Type of Evaluation
(1)Screening ____ Oral Interview
____ Paper Eval
(2) ✓ Selection Interview

tructions Award points based on highest level for both education and related work experience (as it exceeds the SCDC Additional Requirements) for selection process
y The selecting official may identify up to eight(8) additional categories/points that are position related for evaluation of the candidate during the interview process
ituation categories should not exceed 100 total possible points

		Points Possible	Points Awarded	Supportive Documentation/Comments
	Education Level (Selection Process)			
____	High School (Non Graduate)	0	____	
____	High School Graduation	1	1	
____	Associate Degree	3	____	
____	Bachelor's Degree	5	____	
____	Master's Degree	7	____	
	Related Experience (Selection Process)			
	** As it exceeds SCDC Additional Requirements**			
____	1 1 99 years of related experience	1	____	
____	2 3 99 years of related experience	2	____	
____	4 5 99 years of related experience	3	____	
____	6 7 99 years of related experience	4	____	
____	8 - 9 99 years of related experience	5	____	
____	10 + years of related experience	6	6	
____	Job Stability	10 -	9	
____	Flexibility	10	8	
____	Classroom Management	10	4	
____	Planning & Organization	10	5	
____	Cooperation	10	6	
____	Security	10	5	
____		____	____	
____		____	____	
	TOTAL POINTS	____	44	

Master File SCDC 16 83 (Rev September 2001)

44

SCDC 0181

2213

-760-

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
Division of Human Resources/Recruiting and Employment Services Branch
APPLICANT EVALUATION

Applicant's Name Larry Yarbrough
Date of Evaluation 2/28/06
Position Title Vocational Teacher
Screening Codes ____ ____ ____ ____
Initials of Panel Members

POSITION NO 015093
Type of Evaluation
(1) Screening ____ Oral Interview
____ Paper Eval
(2) ✓ Selection Interview

Instructions Award points based on highest level for both education and related work experience (as it exceeds the SCDC Additional Requirements) for selection process only The selecting official may identify up to eight(8) additional categories/points that are position related for evaluation of the candidate during the interview process Evaluation categories should not exceed 100 total possible points

		Points Possible	Points Awarded	Supportive Documentation/Comments
	Education Level (Selection Process)			
____	High School (Non-Graduate)	0	____	
____	High School Graduation	1	1	
____	Associate Degree	3	____	
____	Bachelor's Degree	5	____	
____	Master's Degree	7	____	
	Related Experience (Selection Process)			
	** As it exceeds SCDC Additional Requirements**			
____	1 1 99 years of related experience	1	____	
____	2 3 99 years of related experience	2	____	
____	4 - 5 99 years of related experience	3	____	
____	6 7 99 years of related experience	4	____	
____	8 9 99 years of related experience	5	____	
____	10 + years of related experience	6	6	
____	Job Stability	10	9	
____	Flexibility	10	8	
____	Classroom Management	10	5	
____	Planning & Organization	10	7	
____	Cooperation	10	8	
____	Security	10	8	
____		____	____	
____		____	____	
	TOTAL POINTS	____	51	

C Master File SCDC 16 83 (Rev September 2001)

SCDC 0182

2214

WORK EXPERIENCE

Describe your work experience in detail Begin with your current or most recent job and continue back to the time that y left school Include military service (indicate rank and each position held) and job related volunteer work, if applicabl Provide an explanation for any gaps in employment. All information in this section must be complete including full dates employment A resume may be attached but not substituted for completion of this section Termination Reason Cod must be completed by using the Termination Reason Code Chart on page 9

Name of Present or Last Employer Union Co Sheriffs Office
Address 210 West MAIN St Union SC Phone (864) 429 1614
Job Title Deputy
Number Supervised none Supervisor s Name Sgt Niel MCKEOWN
From 6 / 30 / 00 To / / Hours Per Week [redacted] Salary [redacted]
May we contact this employer? Yes ( ) No (X)
Job Duties (give details) Deputy Sheriff's

Termination Reason Code STILL EMPLOYED

Name of Present or Last Employer City of Union
Address THOMSON BLV UNION SC Phone (864) 429-1213
Job Title Public Safety Officer
Number Supervised _____ Supervisor s Name _____
From 10 / 20 / 96 To 6 / 20 / 98 Hours Per Week [redacted] Salary [redacted]
Job Duties (give details) Public Safety Officer

Termination Reason Code 005

Name of Present or Last Employer Torrington
Address Industrial Park Rd Phone [redacted]
Job Title machinist
Number Supervised no Supervisor s Name ~~[redacted]~~ Ronnie Wages
From 6 / 20 / 71 To 10 / 20 / 96 Hours Per Week [redacted] Salary [redacted]
Job Duties (give details)

Termination Reason Code 005

Name of Present or Last Employer Buffalo Mill

Address Buffalo SC Phone ( )

Job Title Shasser tender

Number Supervised NO Supervisor s Name Weaver Medford

From 3 / 14 / 68 To 6 / 20 / 00 Hours Per Week [redacted] Salary [redacted]

Job Duties (give details)

Termination Reason Code 105

Name of Present or Last Employer

Address Phone ( )

Job Title

Number Supervised Supervisor s Name

From / / To / / Hours Per Week Salary

Job Duties (give details)

Termination Reason Code

Name of Present or Last Employer

Address Phone ( )

Job Title

Number Supervised Supervisor s Name

From / / To / / Hours Per Week Salary

Job Duties (give details)

Termination Reason Code

SCDC
0184

Inez Moore Tenenbaum
State Superintendent of Education

STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

Masters w/0 years of experience - $40,284

March 13 2006

Larry A Yarbrough
[redacted]

Dear Larry Yarbrough.

We have received and evaluated your application for teacher certification in South Carolina At this time, you have satisfied all requirements for a Career and Technology Education Work-Based teaching credential with the exception of an all-clear F B I fingerprint review and verification of employment as a teacher in a South Carolina public school Your fingerprint card has been forwarded to the F B I for processing The certification for which you are eligible once the above mentioned requirements have been met is as follows

Type of Certificate	Class	Certification Area(s)	Years of Teaching Experience	Valid Period
Induction	Masters	Carpentry	0 0	2005-06

This document is not a teaching certificate This statement is issued as evidence of your qualification for the certificate described above You may wish to present this statement to school districts where you are seeking employment Please be advised that your actual teaching certificate will not be issued until an all-clear F B I fingerprint review and verification of employment as a teacher in a South Carolina public school is received A verification form has been enclosed for your convenience When these requirements are met a certificate will be issued for the 2005-06 school year and can be renewed for a one-year period if you have satisfactorily completed the required professional development institutes and taken the basic skills examination Information concerning registration for the professional development institutes can be found at http //www scdirect org You must complete the following institutes during your first year of certification

- DIRECT Institute #1 – Methods of Teaching
- DIRECT Institute #2 – Class and Lab Management

Career and technology education teachers must take the Basic Skills Examination during their first year of certification and pass all three parts of the exam by the end of the fifth year of certification You are eligible to validate basic skills competency using either Praxis I – Pre-Professional Skills Test administered by Education Testing Services or WorkKeys administered by ACT To validate basic skills competency using WorkKeys you must submit scores at the following minimum levels

- Reading for Information Level 4
- Applied Mathematics Level 4
- Writing Level 3

Division of Teacher Quality and School Leadership Landmark II Office Building 3700 Forest Drive, Suite 500 Columbia, SC 29204
Phone 803-734-9929 Fax 803 734-2873 Website www sctcachers org

Section 59-26-40 of the Code of Laws of South Carolina State Board of Education Regulation R43-63 and the Attorney General s ruling both state that teachers certified under the career and technology education work-based process may be employed a maximum of five years if they have not obtained an acceptable score on all three parts of the Basic Skills Examination The Attorney General s ruling further states that the only restriction on the number of times a career and technology education teacher may take the exam is the number of times it is offered during the five (5) year period allowed career and technology education teachers for completion of certification requirements Your five year period will end on June 30 2010

If you have any questions or if I can be of further assistance do not hesitate to contact me at 803-734-5830

Sincerely

Steve Wash
Education Associate
Office of Educator Certification

C15093
2/6/06

[redacted] [redacted]

Larry E. Yarbrough

Objective

To obtain the job of Vocational Teacher at South Carolina Department of Corrections

Education

- University off South Carolina – 1972 – 1973 one year of study in Commercial Science
- Graduate of Union High School which included two years of carpentry training

Work expenence

- Own business in construction which includes building decks buildings repair and remodeling 1971 - Present
- Union County Shenff's Office – Sheriff's Deputy 06-00 through Present
- Union County Public Safety Department – 1998 – 2000
- Tomngton Tyger River Plant Machinest – 1971 – 1998
- Buffalo Mill – 1968 - 1971

Volunteer experience

Philippines for Building Project in 1988

Hurricane Hugo Relief in Charleston SC 1989 (five trips)

Jamaica for Building Project in 1990

Bahamas for Hurricane Relief Project in 1991

Dominican Republic for Hurricane Relief Project in 1993

Bay St. Louis Mississippi for Hurricane Relief in 2005

Salkehatchie Summer Service 1994 – 2005 – project of the United Methodist Church involving youth ages fourteen and up – served as Site and Adult Leader which involved supervising and teaching and fourteen to sixteen year old youth in carpentry skills

Post-it® Fax Note 7671	Date 2/2/06	# of pages ▶
To Esther Daniel	From June	
Co./Dept.	Co	
Phone #	Phone # THANKS	

Residential Home Builders

LARRY YARBROUGH
[redacted]

Registration number 34104
Registration type Specialty
Expiration 06/30/2006

Specialties
PAINTER/WALL PAPER
DRYWALL INSTALL/REPAIR
VINYL/ALUMINUM SIDING

South Carolina Department of Corrections

MARK SANFORD Governor
JON OZMINT Director

March 20, 2006

Larry E Yarborough
[redacted]

SUBJECT Vocational Teacher Position # 015093

Dear Mr Yarborough

This is to confirm your selection for the position of Vocational Teacher at Tyger River Correctional Institution

Your effective date of employment will be coordinated by June Henderson Your starting base salary is $40,284

We look forward to having you join our Agency and wish you success in your new position If I or the staff of the Division of Human Resources can be of help now or in the future please let me know

Sincerely

Connie C Riley

Connie C Riley Chief
Recruiting & Employment Services Branch

CCR. mlm

cc Hoyt Sharpe
June Henderson
Kelvin A Perry

THE LANGUAGE IN THIS LETTER DOES NOT CREATE AN EMPLOYMENT CONTRACT BETWEEN THE EMPLOYEE AND THE AGENCY. THIS LETTER DOES NOT CREATE ANY CONTRACTUAL RIGHTS OR ENTITLEMENTS. THE AGENCY RESERVES THE RIGHT TO REVISE THE CONTENT OF THIS LETTER, IN WHOLE OR IN PART. NO PROMISES OR ASSURANCES, WHETHER WRITTEN OR ORAL, WHICH ARE CONTRARY TO OR INCONSISTENT WITH THE TERMS OF THIS PARAGRAPH CREATE ANY CONTRACT OF EMPLOYMENT.

PO Box 21787 4444 Broad River Road - Columbia, SC 29221-1787 - Telephone (803) 896-8555
http //www.state sc us/scdc E mail corrections info@doc.state.sc us

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
	C/A NO 04-CP-40-1761
James "Cal" Bell, Othella Bernard,)	
Katherina Bower, Linda M.W Bratton,)	
Ann T Bridges, Rance C. Cobb, Jeannie)	
B Croxton, Bernetha L. Culbreath,)	
William K. Dreyer, Jacqueline D. Farr,)	
Ruth Fritts, Nancy Glenn, Etta Jane)	
Jones, Geneva M. Martin, Mary H)	
McCabe, Beverly McClanahan, Max)	
D Randolph, Carolyn McIver Smith,)	
Maggie G Williams and Paula Woodlief,)	
)	
Plaintiffs,)	
)	
vs)	AFFIDAVIT OF BEVERLY MCCLANAHAN
)	
South Carolina Department of)	
Corrections and Palmetto Unified)	
School District No 1,)	
)	
Defendants)	

Beverly McClanahan, being first duly sworn, deposes and says

1 I was separated from employment with the Palmetto Unified School District (PUSD) No 1 and the South Carolina Department of Corrections (SCDC) due to a reduction in force effective June 1 2003

2 I exercised bumping rights as an entry level correctional officer For over a year I worked with grounds/maintenance at SCDC, mostly running the greenhouse While still an entry level correctional officer, I worked in Horticultural Services for SCDC 9 ½ months BM

3 I was promoted to Vocational Trainer at a Lieutenant II pay grade for the last year of my employment with SCDC As Vocational Trainer, I had the same duties that I had as a teacher prior to the reduction in force but was not paid at the teacher pay rate

Further, affiant sayeth not.

Beverly McClanahan
Beverly McClanahan

Sworn to and subscribed before me
this 27th day of July, 2006
Paula F Dreyer
Notary Public for South Carolina
My commission expires 10/26/06

Employees Subject to RIF by Institution

Allendale	Kisha Harrison	9999			Library Asst	850
Allendale	Geraldean Odoms	9999			Computer Lab Mgr	850
Allendale	John Lawson, Jr	UB04			Vocational Teacher	830
Allendale	Donald Thomas	UB04			Vocational Teacher	830
Allendale	John Newsome	UB06			Guidance Counselor	840
Allendale	Rita Beenken	UB02			Certified Teacher	850
Allendale	Elizabeth Brooks	UB02			Certified Teacher	850
Allendale	Harvey Hayes, Jr	UB02			Certified Teacher	850
Broad River	Yvette Lakin	UB02			Certified Teacher	850
Broad River	Lavenia Thomas	UB02			Certified Teacher	850
Broad River	William Dittmar	UB04			Vocational Teacher	830
Broad River	Beverly McClanahan	UB04			Vocational Teacher	830
Broad River	Lavern Witherspoon	AH40	06	C	Program Coordinator II	840
Broad River	Geneva Martin	UB02			Certified Teacher	850
Evans	James Hendley	CD20	04	C	Library Specialist	820
Evans	Cecil Gainey, Jr	UB04			Vocational Teacher	830
Evans	Sharon D Mullins	AA75	04	A	Administrative Assistant	840
Evans	Mary Hudson	UB02			Certified Teacher	850
Evans	Horace Bass	UB07			Principal	870
Goodman	Mariam Myers	UB02			Certified Teacher	850
Goodman	Valeta Geddis	GA40	04	B	Human Services Spec II	840
Headquarters	Merle Brigman	9999			Admin Specialist II	810
Headquarters	Katherine Myers	AA75	04	A	Admin Assistant	810
Kershaw	Renee Fleming	CD20	04	C	Library Speicalist	820
Kershaw	Thomas Brown	UB04			Vocational Teacher	830
Kershaw	Patrick Young	UB04			Vocational Teacher	830
Kershaw	Cathy Balkcum	UB02			Certified Teacher	840
Kershaw	Myrtice Fye	UB06			Guidance Counselor	840
Kershaw	James Baker	UB02			Certified Teacher	850
Kershaw	Mary Beaty	UB02			Certified Teacher	850
Kershaw	Geraldine Parnell (G)	CB30			Teacher Assistant	850
Kershaw	Paula Woodlief	UB02			Certified Teacher	850
Kirkland	Delores Labrew	UE07			Academic Program Manager	850
Kirkland	Carolyn Smith	UE07			Academic Program Manager	850

Employees Subject to RIF by Institution

Leath	Elois Jones	UB02			Certified Teacher (Librarian)	820
Leath	Katherian Bowyer	UB04			Vocational Teacher	830
Leath	Sylvia Deal	UB04			Vocational Teacher	830
Leath	George King	UB04			Vocational Teacher	830
Leath	Ann Bridges	UB06			Guidance Counselor	840
Leath	Frank Boxx, Jr	UB02			Certified Teacher	850
Leath	Bernetha Culbreath	UB02			Certified Teacher	850
Leath	Ruth Fritts	UB02			Certified Teacher	850
Leath	Rance Cobb	UB07			Principal	870
Lee	Mary Timmons	AA50	03	A	Admin Specialist II	810
Lee	David Deloe	UB04			Vocational Teacher	830
Lee	Ruth Pierson	UB06			Guidance Counselor	840
Lieber	Judith Haas	CB35	03	D	Assoc Teacher	820
Lieber	Mark White	UB04			Vocational Teacher	830
Lieber	Robert Brown	UB02			Certified Teacher	850
Lieber	William Marinko	UB02			Certified Teacher	850
Lieber	Adaline Pyatt	UB02			Certified Teacher	850
Lieber	Jerrelyn Tripp	UB02			Certified Teacher	850
MacDougall	Margie Prioleau	9999			Admin Asst	870
Manning	William Vinson III	UB07			Principal	870
Manning	L S Green	UB02			Certified Teacher	820
Manning	James Dorsey	UB04			Vocational Teacher	830
Manning	Carroll King	UB04			Vocational Teacher	830
Manning	Jacqueline Venning	UB06			Guidance Counselor	840
Manning	Jeannie Croxton	UB02			Certified Teacher	850
Manning	Rose Ruger	UB02			Certified Teacher	850
Manning	Talmadge Smith	UB02			Certified Teacher	850
McCormick	Grayson Jefferies, Jr	UB04			Vocational Teacher	830
McCormick	Etta Jones	UB06			Guidance Counselor	840
McCormick	Danny Doss	UB02			Certified Teacher	850
McCormick	William Dreyer	UB02			Certified Teacher	850
Northside	Arnold Henderson, Jr	UB04			Vocational Teacher	830
Northside	Susan White	UB02			Certified Teacher	850
Northside	Marguerite Mailloux	UB02			Certified Teacher	850
Perry	Mary McCabe	UB02			Certified Teacher (Librarian)	820
Perry	James Bell	UB04			Vocational Teacher	830

Employees Subject to RIF by Institution

Perry	Johnny Floyd	UB04			Vocational Teacher	830
Perry	Aldean Henley	GA40	04	B	Human Services Spec II	830
Perry	Richard Lenker	UB04			Vocational Teacher	830
Perry	Othellan Bernard	UB02			Certified Teacher	850
Perry	Linda Bratton	UB02			Certified Teacher	850
Perry	Ronald Davis	UB02			Certified Teacher	850
Perry	Eileen Howard	UB02			Certified Teacher	850
Stevenson	Nancy Glenn	UB02			Certified Teacher(Librarian)	820
Tyger River	Willa Parks	9999			Special Teacher	850
Tyger River	William White	UB02			Certified Teacher (Librarian)	820
Tyger River	Marilyn Thomson (G)	AA75			Administrative Assistant	850
Walden	Theron Phillips	UB04			Vocational Teacher	830
Walden	Eugene McMillan	UB02			Certified Teacher	850
Wateree	Anthony Bettencourt	UB04			Vocational Teacher	830
Wateree	James Corbett	UB04			Vocational Teacher	830
Wateree	Albertha Haynesworth	UB07			Principal	870
Watkins	Edward Sharpe	UB04			Vocational Teacher	830

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

MEMORANDUM

TO All Employees

FROM Jon E Ozmint

SUBJECT Reorganization and Agency Reduction-In-Force

DATE March 31, 2003

Over the last two and a half months, I have gained tremendous respect for the mission of the Department of Corrections and the fine employees who work here I have been to almost every location and seen our employees perform their jobs at admirable levels

Without question, the most difficult task I have ever faced is to operate this agency without adequate funding For two years, the agency has stretched its dollars farther than ever before Programs have continued without sufficient staff, often only because employees have set high standards to continue providing quality service

For two years the agency has failed to operate within our allocated funding Again this year, the Budget & Control Board authorized us to operate with a deficit of nearly $28 million At the same time however I was advised that the agency must take immediate steps to operate within our budget for the next fiscal year Unfortunately, funding shortages now appear to be at least as bad next year

I have reviewed the organizational structure of the agency and determined that changes must be made to adjust to our level of funding and prepare for the future The organization that I have put in place should be equipped to handle the challenges that face us A general outline of the organizational change is listed at the end of this memorandum.

One of the most difficult decision any leader must make is to eliminate the jobs of employees However our agency has reached the point of financial crisis so that we must now have a Reduction-In-Force I have identified 148 positions in many areas throughout the agency to reduce staff primarily in headquarters, institutional non-security, and support functions Employees in areas that will be affected include

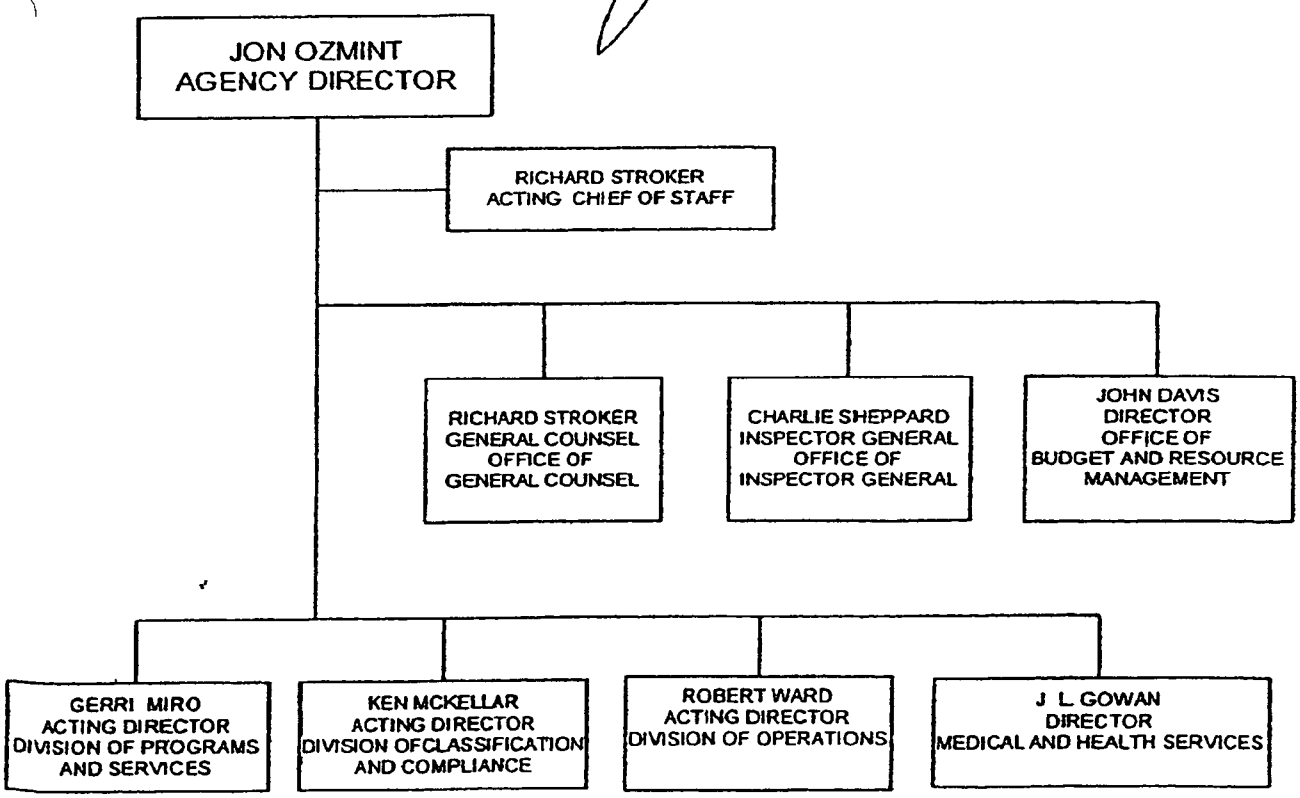
Educational Services
Youthful Offender
Industries
Classification & Inmate Records
Inmate Drug Testing
Office of Communications
Human Resources
Training Academy
Coastal Office
Temporary & Temporary Grant
Inspections, Operational Review & Accreditation
Substance Abuse Services
Internal Audits
Executive Affairs
Human Services
Health Services & Behavioral Medicine
Resource & Information Management
Maintenance & Construction
Appalachian Office
Probationary Employees

The Reduction-In-Force process identifies positions and functions to be eliminated Pursuant to state law, the process also allows senior employees in their job classification who are subject to a Reduction-In-Force to bump the least senior employees in the same job classification or job classification series, in the competitive area As a result, many employees who may not be located in these areas may also be subject to Reduction In-Force A representative from the Division of Human Resources will be contacting affected employees in the near future to set up times to meet and discuss the Reduction-In-Force options available

Again, I regret the need to take such a drastic step I am hopeful the economy will improve and that many of the employees affected by this action will be able to return to work

I appreciate your understanding of these decisions during difficult times I ask for your support and prayers for our agency and our employees

S/ Jon E. Ozmint
Jon E. Ozmint



South Carolina Department of Corrections
Operating Expenditures
Fiscal Years 2000 - 2005

Funding sources include state appropriations, federal funds, special revenues, Prison Industries and canteen funds
Capital Improvement Funds, and Federal Funds Allocated to Counties/State Agencies are excluded

Actual Expenditures	Fiscal Year 2000	Fiscal Year 2001	Fiscal Year 2002	Fiscal Year 2003	Fiscal Year 2004	Fiscal Year 2005
Personal Service	$192 214 478	$207 018 239	$185 525 150	$175 838 729	$166,974 040	$170 278 897
Contractual Services	$27,977 986	$17 371 781	$14 765 754	$16 155 712	$15 655,190	$17 907 365
Supplies	$34 211 168	$34 556 082	$29 962 873	$30 267 403	$29,484 295	$32 496,325
Fixed Charges	$2 888 150	$3 083 298	$2 545 379	$2 489 153	$2,356 736	$2,555 572
Travel	$239,326	$168 444	$63 624	$56 603	$45,706	$35 593
Equipment	$7 129,635	$2,033,990	$854,345	$1,122,181	$646 326	$1 427 744
Purchases for Resale*	$18 100 789	$16 641 922	$14,999,580	$16,280,212	$15 731 929	$15 955 164
Case Services	$13 163 748	$18 671 827	$16 588 530	$18 146 198	$23 864,120	$18 043,009
Interest Late Payment Charges	N/A	$30	$41	N/A	$14	$0
Heat/Lights/Power	$10 256 194	$12,011,055	$10,158,981	$11 640,860	$12 172,340	$13,362,688
Principal Interest	N/A	N/A	N/A	N/A	N/A	$400 933
Transportation	$1 278,880	$1,304,243	$886 547	$977 950	$1 344,176	$1 568 860
Prosthetic Appliances	N/A	$93 738	$73 197	$96 614	$101 387	$80 436
Employee Suggestion Awards	N/A	$64	N/A	N/A	N/A	N/A
Employee Benefits	$59 683,085	$65,603,374	$63 689,077	$62 160 261	$61 246 353	$62 269,908
Total Expenditures	$367 143,439	$378,558,087	$340,113 058	$335,231 676	$329 622 612	$336,382 494
Expenditures Excluding Purchases for Resale	$349,042,650	$361,916,165	$325,113,478	$318,951,464	$313,890,683	$320,427,330

** This budget line includes consumer goods purchased for resale principally in canteens and raw materials purchased for resale after further processing in Prison Industries*

(Special Note This information is accurate as of June 30 of each fiscal year Data are presented and recorded in accordance with the budgetary accounting process of the State of South Carolina)

08/21/03

PALMETTO UNIFIED SCHOOL DISTRICT
Five Year Expenditure Comparison

		FY 04 Projected	FY 03	FY 02	FY 01	FY 00
State	810	177 884 00	179 520 95	215 992 00	320 135 00	333 821 27
	820	273,959 00	597 878 28	605 544 00	844 398 00	667 141 98
	830	651 469 00	1 868 572 69	1 885 466 00	2 384 493 00	1 944 209 04
	840	139 134 00	587 287 08	572 472 00	666,956 00	569,240.52
	850	888 713 00	2,732 963 60	2 764 527 00	3 897 532 00	2,819 807 69
	860	81,587 00	80 703 17	91 802 00	131 385 00	162 767 63
	870	169 974 00	476 074 21	514 872 00	710,247 00	545 230.33
	Fringes	881 607 00	2 397 849 34	2 569 130 00	2 372 896 00	1 955 476 00
Total State		3 264 327 00	8 920 849.32	9 219 805 00	11 328 042 00	8 997 694 46
Federal	810	16 000 00	16 000 00	0 00	174 668 00	0 00
	820	7 312.00	8 213.00	8 532 00	5 135 00	4 682 90
	830	216 820 00	163 865.24	163 312.00	303 947 00	90 307 07
	840	0 00	0 00	0 00	22 888 00	0 00
	850	903 000 00	1 322 799 24	1 048 797 00	829 071 00	942,313 35
	860	117 000 00	94 511 00	97 472.00	18 503 00	36 014 39
	870	0 00	0 00	0 00	0 00	0 00
Total Federal		1 260 132.00	1 605 388 48	1 318 113 00	1 354 212.00	1 073 317 71
EIA	810	107 665 00	41 632 00	41 608 00	45 887 00	123 224 00
	820	22,316 00	19 052.75	22 542.00	44,213 00	31,366 24
	830	66 119 00	55 857 00	79 991 00	106 288 00	149 687 62
	840	21 772 00	29 026 68	25 074 00	45,200 00	80 708 23
	850	146 070 00	255 057 07	147 480 00	294 767 00	542 117 81
	860	13 037 00	2 660 21	10 055 64	11 977 00	5 335 62
	870	21 672.00	28 190 76	23 280 26	16 727 00	74 174 50
Total EIA		398 651 00	431 476 47	350 030 90	565 059 00	1 006 614 02
EFA	810	653 324 00	736 348 00	721 489 00	733 167 00	575 825 49
	820	114,286 00	121 384 81	133 527 69	176 382 00	133 825 14
	830	445 783 00	486 699 82	466 655 70	471 818 00	236 337 72
	840	87 211 00	167 779 54	187 745 42	183 470 00	125 252 86
	850	989 403 00	824 596 89	989 734 06	1 000 626 00	626 941 73
	860	92 166 00	101,319 84	79 215 15	55 593 00	25 993 85
	870	121 305 00	176 416 76	160 761 79	168 792 00	96 731 21
Total EFA		2 503 478.00	2,614 545 66	2 739 128.81	2,789 848 00	1 820 908 00
Other and EFA Carryover	810	22 371 00	9 853 26	86 465 00	71 849 00	22,591 43
	820	25,222.00	22 516 10	40 207 00	3 480 00	47 347 52
	830	114 485 00	165 727 89	265 919 00	163 407 00	173 677 75
	840	0 00	0 00	17 083 05	0 00	0 00
	850	79 767 00	141 419 02	323 547.00	359 798 00	216 606 00
	860	384 00	1 098 86	1 835 00	0 00	0 00
	870	23 491 00	18 401.34	23 875 00	2,939 00	10 710 00
	Const				5 059 10	4 00
Total EFA Carryover		265 720 00	359 016 47	758 931 05	606 532.10	470 936 70
ABE STATE	850	89 880 00	89 880 00	99 782 00	141 526 00	163 004 00
CANTEEN	820	0 00	0 00	0 00	0 00	793 94
	830	0 00	0 00	0 00	0 00	0 00
	850	0 00	0 00	0 00	0 00	0 00
Total Canteen		0 00	0 00	0 00	0 00	793 94
Total Education Expenditures		7 782,188 00	14 021 156 40	14 485 790 76	16 785 219 10	13 533 268 83

Reduction of
(6,238 968 40)

Teacher Law Suit Settlement was paid out in FY01

SCDC
0197

Education Federal Funding Comparison

Grant Title	FY 04 Award	FY 03 Award	FY 02 Award
Title V	7 312 00	8 286 03	9 405 35
Title I	1 155 594 00	1 047 725 23	774 235 00
Occ Ed	57 196 00	51 507 00	51 166 46
IDEA	224 257 00	165 896 61	140 074 76
Staff Dev/Title VI	0 00	24 804 00	54 109 47
Post Secondary	809 786 00	777 231 00	721 384 00
ABE	0 00	914 616 21	901 461 10
Title II NCLB	0 00	62 939 03	0 00
Cap Bldg & Imp	0 00	1 348 72	2 213 15
Total Federal Education Funds	2 254 145 00	3 054 353 83	2 654 049 29

These awards have not been announced at this time

Institutions Greatly Reduced by RIF

Institutions	Remaining Staff (SDDC & Grant Funded)	Enrollment as of 03/01/03				County Funded Programs		
		Academic	Voc	Acad Yr to Date	Voc Yr to Date	# of Teachers	Hrs/ Wk	Class End Date
Allendale	None	172	49	382	101	Harvey Hayes Elizabeth Brooks Albert Ramsey Kisha Harrison	6 6 6 6	04/10/03
Broad River	None	225	59	353	106	Yvette Lakin Nancy Odom William Snipes	8 8 8	03/20/03
Evans	1 Patsy Haithcock – Pink Slip Teacher 13 hrs/wk 2 Brenda Moody – Pink Slip Computer Lab 37 5 hrs/wk 3 Resia Henry – Title I Tchr Assistant (has to be moved) 4 Kimberly Thurman Classroom Teacher	151	29	450	101	Kimberly Thurman Risha Henry Caroline Bathney Ronnie Moore Patsy Haithcock	5 5 5 5 30	06/30/03
Goodman	1 Brenda Rhoten Classroom Teacher (½ Goodman & ½ Stevenson) 2 Joseph Thomas Pink Slip Teacher (Goodman & Kirkland) 17 hrs/wk	147	9	378	28	None		
Kershaw	None	202	23	611	89	James Baker	4	06/01/03
Kirkland	Maurie Singletary – Pink Slip Special Ed Teacher-20hrs/wk	25		45		None		
Leath	1 Patricia Williams Pink Slip Teacher 12 hrs/wk 2 Sandra Cook Pink Slip Teacher 18 hrs/wk	169	93	416	216	None		
Lieber	Robert Moore-Classroom Teacher (G)	379	18	1,056	74	CeCe Bryant Alice Baughman Judith Haas Robert Moore	40 24 4 4	05/29/03

Institutions Greatly Reduced by RIF

Institutional	Remaining Staff (SCDC & Grant Funded)	Enrollment as of 03/01/03				County Funded Programs		
		Academic	Voc	Acad Yr to Date	Voc Yr to Date	# of Teachers	Hrs/ Wk	Class End Date
Manning	Sherl Akins Pink Slip Teacher 37 5 hrs/wk	147	41	478	160	Rose Ruger Jackie Venning Gerda Willmeth Talmedge Smith Robert Hill	8 8 4 4 4	06/30/03
McCormick	None	118	15	419	29	Jane Jones	6	04/30/03
Northside	None	54	13	179	24	Jane Mailloux	6	04/28/03
Perry	None	188	39	699	132	Linda Bratton Othella Bernard Mary McCabe Eileen Howard Paula Cargill Cal Bell (carpentry)	6 6 6 6 6 6	05/30/03
Walden	None	49	38	104	65	None		
Watkins	None	15		40		Lavenia Thomas Nancy Glenn	4 4	03/20/03

4/8/2003

RESPONSE TO QUESTION # 5 - FTE/TEMP/TEMP GRANT EMPLOYEES

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
4/27/04	ADDISON LOIS	9999	UNCLASSIFIED	ADMINISTRATIVE ASSIST	00		LEE CORRECTIONAL INSTITUTION
4/8/05	AKINS SHERL W	9999	UNCLASSIFIED	ADMIN ASST	00		MANNING CORRECTIONAL INSTITUTION
3/22/04	AKINS SHERL W	9999	UNCLASSIFIED	ADMIN ASST	00		MANNING CORRECTIONAL INSTITUTION
7/31/06	ALBERY ROY E	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		WALDEN CORRECTIONAL INSTITUTION
2/27/06	ALBERY ROY E	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		WALDEN CORRECTIONAL INSTITUTION
2/22/05	ALBERY ROY E	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		WALDEN CORRECTIONAL INSTITUTION
6/14/06	BAGNAL HENRY T	9999	UNCLASSIFIED	PRINCIPAL	00		TURBEVILLE CORRECTIONAL INSTITUTION
7/18/05	BAGNAL HENRY T	9999	UNCLASSIFIED	PRINCIPAL	00		TURBEVILLE CORRECTIONAL INSTITUTION
1/9/06	BAKER JEANNINE L	JD30	CORR OFF I	OFFICER II	3	E	KERSHAW CORR INST
12/6/04	BANGURA ISHA	JD35	CORR OFF II	SERGEANT II	4	D	EVANS CORR INST
1/17/06	BELL JAMES C	AH35	PROG COORD I	PROG COORD I	5	B	PERRY CORR INST
9/29/97	BETTENCOURT, ANTHONY	JD40	CORR OFF III	VOC ED TRAINER	5	B	WATEREE RIVER CORR INST
12/15/05	BLANTON WENDELL J	9999	UNCLASSIFIED	SUPT OF EDUCATION	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
12/6/04	BLANTON WENDELL J	9999	UNCLASSIFIED	SUPT OF EDUCATION	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
12/1/03	BLANTON WENDELL J	9999	UNCLASSIFIED	SUPT OF EDUCATION	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
6/5/06	BOWEN WILLIAM S	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		MACDOUGALL CORRECTIONAL INST
7/6/06	BOXX JR FRANK A	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		LEATH CORR INSTIT (WOMEN)
7/11/05	BOXX, JR FRANK A	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		LEATH CORR INSTIT (WOMEN)
6/10/03	BOXX JR FRANK A	GA50	HUMAN SVC COORD I	HUMAN SVC COORD I	5	C	LEATH CORR INST
6/2/03	BRATTON LINDA M	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		TYGER RIVER CORRECTIONAL INSTITUTIO
8/22/05	BRIGMAN MERLE T	9999	UNCLASSIFIED	ADMIN SPEC II	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
7/12/04	BRIGMAN MERLE T	9999	UNCLASSIFIED	ADMIN SPEC II	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
10/4/04	BRITT, LEWIS A	JD40	CORR OFF III	VOC ED TRAINER	5	B	EVANS CORR INST
12/1/03	BROWN GEORGIA J	9999	UNCLASSIFIED	CERTIFIED TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION
7/7/06	BROWN THOMAS A	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		KERSHAW CORRECTIONAL INSTITUTION
7/5/05	BROWN THOMAS A	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		KERSHAW CORRECTIONAL INSTITUTION
8/30/04	BROWN THOMAS A	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		KERSHAW CORRECTIONAL INSTITUTION
9/17/01	BUEHLER, CONRAD C	JD30	CORR OFF I	OFFICER II	3	E	PERRY CORR INST
4/17/05	BURNETT PAMELA B	UB07	PRINCIPAL	PRINCIPAL	00		TYGER RIVER CORRECTIONAL INSTITUTIO

RESPONSE TO QUESTION # 5 FTE/TEMP/TEMP GRANT EMPLOYEES

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BASE	LEV	LOCATION
5/15/06	CAMPBELL ROBERT J	UB04	VOCATIONAL TEACHER	VOCATION TEACHER B	00		TURBEVILLE CORRECTIONAL INSTITUTION
3/17/04	CLARK CHAD A	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		WALDEN CORRECTIONAL INSTITUTION
1/5/87	CONNELLY, BILLY T	JD40	CORR OFF III	LT II	5	B	LIEBER CORR INST
2/14/06	CORLEY ANTHONY W	UB04	VOCATIONAL TEACHER	VOCATIONAL TEACHER	00		TRENTON CORRECTIONAL INSTITUTION
3/27/06	CROWE MARTHA S	9999	UNCLASSIFIED	TEACHERS AIDE	00		TURBEVILLE CORRECTIONAL INSTITUTION
3/28/05	CROWE MARTHA S	9999	UNCLASSIFIED	TEACHERS AIDE	00		TURBEVILLE CORRECTIONAL INSTITUTION
4/26/04	CROWE MARTHA S	9999	UNCLASSIFIED	TEACHERS AIDE	00		TURBEVILLE CORRECTIONAL INSTITUTION
6/2/03	DAVIS RONALD M	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		TYGER RIVER CORRECTIONAL INSTITUTIO
5/2/05	DECLERCQ BRUCE A	UB04	VOCATIONAL TEACHER	VOCATIONAL TEACHER	00		TRENTON CORRECTIONAL INSTITUTION
7/10/06	DEMKO LORETTA A	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		CAMILLE GRAHAM CORRECTIONAL INST
4/12/06	DEMKO LORETTA A	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		CAMILLE GRAHAM CORRECTIONAL INST
4/13/05	DEMKO LORETTA A	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		CAMILLE GRAHAM CORRECTIONAL INST
8/28/89	DITTMAR, WILLIAM R	JD40	CORR OFF III	VOC ED TRAINER	5	B	BROAD RIVER CORR INST
8/14/06	DOZIER MARILYN W	9999	UNCLASSIFIED	ADMIN SPEC II	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
8/21/06	DYAR LINDA H	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		TRENTON CORRECTIONAL INSTITUTION
6/3/02	EASTERLIN, BRUCE L	JD40	CORR OFF III	VOC ED TRAINER	5	B	LIEBER CORR INST
3/23/92	EMRHEIN, GILBERT	JD35	CORR OFF II	CORPORAL II	4	B	LIEBER CORR INST
8/16/93	FERGUSON, JANICE P	JD35	CORR OFF II	CORPORAL II	4	B	LEATH CORR INST
8/14/06	GARDNER JR RICHARD O	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		KERSHAW CORRECTIONAL INSTITUTION
3/17/05	GLENN NANCY B	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		TRENTON CORRECTIONAL INSTITUTION
7/2/03	GREEN L S	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		MANNING CORRECTIONAL INSTITUTION
6/2/03	GREEN L S	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		CAMILLE GRAHAM CORRECTIONAL INST
7/10/06	GREENE ALFONZO	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		MACDOUGALL CORRECTIONAL INST
7/27/05	GREENE ALFONZO	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		MACDOUGALL CORRECTIONAL INST
8/30/04	GREENE ALFONZO	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		MACDOUGALL CORRECTIONAL INST
10/27/03	HAITHCOCK PATSY A	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		EVANS CORRECTIONAL INSTITUTION
4/14/03	HALL, ALBERT W	JD40	CORR OFF III	VOC ED TRAINER	5	B	MCCORMICK CORR INST
1/20/06	HATCHELL AMANDA M	9999	UNCLASSIFIED	ADMINISTRATIVE ASSIST	00		WATEREE RIVER CORRECTIONAL INSTITU
6/2/03	HENDERSON BROOKS	UB04	VOCATIONAL TEACHER	VOCATIONAL TEACHER	00		TYGER RIVER CORRECTIONAL INSTITUTIO

RESPONSE TO QUESTION # 5 FTE/TEMP/TEMP GRANT EMPLOYEES

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
9/3/02	HILL WILLIE C	JD40	CORR OFF III	VOC ED TRAINER	5	B	MCCORMICK CORR INST
11/21/05	HOLLEY BARBARA J	9999	UNCLASSIFIED	ADMIN ASST	00		TYGER RIVER CORRECTIONAL INSTITUTIO
6/2/03	HOWARD EILEEN L	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		TYGER RIVER CORRECTIONAL INSTITUTIO
7/24/06	HUNTER SANDRA R	9999	UNCLASSIFIED	TEACHERS AIDE	00		WATEREE RIVER CORRECTIONAL INSTITU
7/19/05	HUNTER SANDRA R	9999	UNCLASSIFIED	TEACHERS AIDE	00		WATEREE RIVER CORRECTIONAL INSTITU
7/20/04	HUNTER SANDRA R	9999	UNCLASSIFIED	TEACHERS AIDE	00		WATEREE RIVER CORRECTIONAL INSTITU
7/15/03	HUNTER SANDRA R	9999	UNCLASSIFIED	TEACHERS AIDE	00		WATEREE RIVER CORRECTIONAL INSTITU
8/8/05	JACKSON KATHY C	9999	UNCLASSIFIED	EDUC PROG SUPV COR	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
8/30/04	JACKSON KATHY C	9999	UNCLASSIFIED	EDUC PROG SUPV COR	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
10/18/05	JOHNSON TINA S	UB06	GUIDANCE COUNSELOR	GUIDANCE COUNSELOR	00		TRENTON CORRECTIONAL INSTITUTION
6/28/04	JONES EVA W	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		LEE CORRECTIONAL INSTITUTION
7/29/03	JONES EVA W	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		LEE CORRECTIONAL INSTITUTION
7/17/06	KINARD BOBBY L	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		MANNING CORRECTIONAL INSTITUTION
8/29/05	KINARD BOBBY L	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		MANNING CORRECTIONAL INSTITUTION
8/26/04	KINARD BOBBY L	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		MANNING CORRECTIONAL INSTITUTION
7/31/06	KING CARROLL B	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		BROAD RIVER CORRECTIONAL INSTITUTI
8/22/05	KING CARROLL B	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		BROAD RIVER CORRECTIONAL INSTITUTI
11/14/05	KINLAW RODNEY L	UB04	VOCATIONAL TEACHER	VOC TEACHER WELDIN	00		CAMILLE GRAHAM CORRECTIONAL INST
2/17/04	LABREW DELORIS	UE07	ACADEMIC PROGRAM M	CURRICULUM COORD	00		CAMILLE GRAHAM CORRECTIONAL INST
7/2/03	LAKIN YVETTE	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		STEVENSON CORRECTIONAL INSTITUTIO
6/2/03	LAKIN YVETTE	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
6/6/06	LATHAM ANITA E	9999	UNCLASSIFIED	CERTIFIED TEACHER	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
3/29/99	LAWSON JR JOHN	JD40	CORR OFF III	VOC ED TRAINER	5	B	ALLENDALE CORR INST
3/29/99	LAWSON JR JOHN M	JD40	CORR OFF III	VOC ED TRAINER	5	B	ALLENDALE CORRECTIONAL INSTITUTION
2/2/05	LOVETT WILLIE J	UB04	VOCATIONAL TEACHER	VOC TEACHER WELDIN	00		CAMILLE GRAHAM CORRECTIONAL INST
6/21/04	MAILLOUX MARGUERITE J	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		TYGER RIVER CORRECTIONAL INSTITUTIO
7/31/06	MARINKO WILLIAM T	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		MACDOUGALL CORRECTIONAL INST
7/16/05	MARINKO WILLIAM T	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		MACDOUGALL CORRECTIONAL INST
7/16/04	MARINKO WILLIAM T	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		MACDOUGALL CORRECTIONAL INST

RESPONSE TO QUESTION # 5 FTE/TEMP/TEMP GRANT EMPLOYEES

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
6/2/03	MARINKO WILLIAM T	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		MACDOUGALL CORRECTIONAL INST
7/2/03	MCCABE MARY H	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		TYGER RIVER CORRECTIONAL INSTITUTIO
12/3/90	MCCLANAHAN, BEVERLY	JD40	CORR OFF III	LT II	5	B	BROAD RIVER CORR INST
8/16/04	MCCOY SHARONDA R	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		CAMILLE GRAHAM CORRECTIONAL INST
8/18/03	MCCOY SHARONDA R	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		CAMILLE GRAHAM CORRECTIONAL INST
11/28/05	MCKAY WILLIE M	9999	UNCLASSIFIED	CERTIFIED TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION
11/30/04	MCKAY WILLIE M	9999	UNCLASSIFIED	CERTIFIED TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION
12/1/03	MCKAY WILLIE M	9999	UNCLASSIFIED	CERTIFIED TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION
12/5/05	MCMILLAN EUGENE M	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		STEVENSON CORRECTIONAL INSTITUTIO
12/6/04	MCMILLAN EUGENE M	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		STEVENSON CORRECTIONAL INSTITUTIO
12/8/03	MCMILLAN EUGENE M	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		STEVENSON CORRECTIONAL INSTITUTIO
6/20/05	MESSER SHARON K	UE07	ACADEMIC PROGRAM M	TITLE I PROGRAM MGR	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
11/24/03	MOODY-BRENDA C	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		EVANS CORRECTIONAL INSTITUTION
11/28/05	MULLEN MARGARET G	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		TRENTON CORRECTIONAL INSTITUTION
1/3/06	MULLIS SUSAN D	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		STEVENSON CORRECTIONAL INSTITUTIO
11/2/05	MULLIS SUSAN D	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		STEVENSON CORRECTIONAL INSTITUTIO
1/4/05	MULLIS SUSAN D	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		CAMILLE GRAHAM CORRECTIONAL INST
1/14/04	MULLIS SUSAN D	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		CAMILLE GRAHAM CORRECTIONAL INST
6/2/03	MYERS MARIAM L	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		CAMILLE GRAHAM CORRECTIONAL INST
10/20/04	MYLES RUSSELL W	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		LEE CORRECTIONAL INSTITUTION
7/5/05	NEAL BRUCE H	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		KERSHAW CORRECTIONAL INSTITUTION
10/12/04	NEAL BRUCE H	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		KERSHAW CORRECTIONAL INSTITUTION
7/5/06	NEIN JAMES C	AH35	PROG COORD I	PROG COORD I	5	B	ALLENDALE CORR INST
3/6/06	NETTLES TERI S	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		RIDGELAND CORR INSTITUTION
4/19/99	NEWBY, CHERYL L	AA75	ADMINISTRATIVE ASST	ADMIN ASST	4	D	LEATH CORR INST
8/8/05	NEWMAN, JR JAMES H	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		LEE CORRECTIONAL INSTITUTION
8/17/05	NEWSOME MICHAEL R	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION
5/31/05	NEWSOME MICHAEL R	UB05	SPECIAL EDUCATION TE	SPECIAL ED TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION
2/21/06	PERRY KYLE R	AH35	PROG COORD I	PROG COORD I	5	B	MANNING CORR INST

RESPONSE TO QUESTION # 5 FTE/TEMP/TEMP GRANT EMPLOYEES

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
11/13/83	PHILLIPS THERON M	JD40	CORR OFF III	VOC ED TRAINER	5	B	WALDEN CORR INST
6/2/03	PIERSON RUTH A	UB06	GUIDANCE COUNSELOR	GUIDANCE COUNSELOR	00		TURBEVILLE CORRECTIONAL INSTITUTION
2/22/06	PRIOLEAU MARGIE D	9999	UNCLASSIFIED	LIBRARY ASSISTANT	00		MACDOUGALL CORRECTIONAL INST
2/28/05	PRIOLEAU MARGIE D	9999	UNCLASSIFIED	LIBRARY ASSISTANT	00		MACDOUGALL CORRECTIONAL INST
2/10/04	PRIOLEAU MARGIE D	9999	UNCLASSIFIED	LIBRARY ASSISTANT	00		MACDOUGALL CORRECTIONAL INST
6/9/03	QUATTLEBAUM, ESTHER	JD30	CORR OFF I	OFFICER II	3	E	KIRKLAND CORR INST
3/27/06	RHOTEN BRENDA L	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		LEE CORRECTIONAL INSTITUTION
11/28/05	ROGERS LEONARD P	9999	UNCLASSIFIED	VOC TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION
11/30/04	ROGERS LEONARD P	9999	UNCLASSIFIED	VOC TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION
12/1/03	ROGERS LEONARD P	9999	UNCLASSIFIED	VOC TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION
1/1/06	ROUNDTREE MILTON	9999	UNCLASSIFIED	R & E ASSESSMENT COO	00		KIRKLAND CORRECTIONAL INSTITUTION
12/16/04	ROUNDTREE MILTON	9999	UNCLASSIFIED	R & E ASSESSMENT COO	00		KIRKLAND CORRECTIONAL INSTITUTION
1/26/04	ROUNDTREE MILTON	9999	UNCLASSIFIED	R & E ASSESSMENT COO	00		KIRKLAND CORRECTIONAL INSTITUTION
6/2/03	RUGER ROSE M	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		CAMILLE GRAHAM CORRECTIONAL INST
10/7/05	RYMSZEWICZ EDWARD A	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		LEATH CORR INSTIT (WOMEN)
11/8/04	RYMSZEWICZ EDWARD A	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		LEATH CORR INSTIT (WOMEN)
12/8/05	SHARPE EDWARD L	9999	UNCLASSIFIED	SPECIAL TEACHER	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
12/13/04	SHARPE EDWARD L	9999	UNCLASSIFIED	SPECIAL TEACHER	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
6/4/06	SINGLETARY MAURIE M	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		KIRKLAND CORRECTIONAL INSTITUTION
6/5/05	SINGLETARY MAURIE M	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		KIRKLAND CORRECTIONAL INSTITUTION
7/19/04	SINGLETARY MAURIE M	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		KIRKLAND CORRECTIONAL INSTITUTION
7/23/03	SINGLETARY MAURIE M	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		KIRKLAND CORRECTIONAL INSTITUTION
6/17/03	SMITH TALMADGE A	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		STEVENSON CORRECTIONAL INSTITUTIO
6/2/03	SMITH TALMADGE A	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		GOODMAN CORRECTIONAL INSTITUTION
12/5/05	STEVENSON DONALD D	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		RIDGELAND CORR INSTITUTION
12/2/04	STEVENSON DONALD D	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		RIDGELAND CORR INSTITUTION
11/17/03	STEVENSON DONALD D	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		RIDGELAND CORR INSTITUTION
8/31/98	SULLIVAN, JUDY E	JD35	CORR OFF II	CORPORAL II	4	B	KERSHAW CORR INST
2/29/02	TAYLOR, CONNIE C	AH35	PROG COORD I	PROG COORD I	5	B	EVANS CORR INST

RESPONSE TO QUESTION # 5 FTE/TEMP/TEMP GRANT EMPLOYEES

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BASE PAY	LEV	LOCATION
8/24/05	THOMAS DONALD C	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		ALLENDALE CORRECTIONAL INSTITUTION
9/8/04	THOMAS DONALD C	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		ALLENDALE CORRECTIONAL INSTITUTION
12/4/04	THOMAS JOSEPH L	9999	UNCLASSIFIED	ADMINISTRATIVE ASSIST	00		GOODMAN CORRECTIONAL INSTITUTION
12/5/03	THOMAS JOSEPH L	9999	UNCLASSIFIED	ADMINISTRATIVE ASSIST	00		GOODMAN CORRECTIONAL INSTITUTION
6/2/03	THOMAS LAVENIA P	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		STEVENSON CORRECTIONAL INSTITUTIO
9/10/01	TUCKER, VERNON A	JD35	CORR OFF II	SERGEANT II	4	D	KERSHAW CORR INST
7/2/03	VENNING JACQUELINE L	UB06	GUIDANCE COUNSELOR	GUIDANCE COUNSELOR	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
6/2/03	VENNING JACQUELINE L	UB06	GUIDANCE COUNSELOR	GUIDANCE COUNSELOR	00		STEVENSON CORRECTIONAL INSTITUTIO
12/8/03	WEAVER GREGORY S	UB04	VOCATIONAL TEACHER	VOCATIONAL TEACHER	00		TYGER RIVER CORRECTIONAL INSTITUTIO
4/3/06	WICKER TOMMIE E	9999	UNCLASSIFIED	CURRICULUM COORD	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
8/15/05	WICKER TOMMIE E	9999	UNCLASSIFIED	CURRICULUM COORD	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
6/2/03	WILLIAMS CAROL C	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		CAMILLE GRAHAM CORRECTIONAL INST
7/5/05	WILLIAMS CHARLES L	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		TYGER RIVER CORRECTIONAL INSTITUTIO
7/16/04	WILLIAMS CHARLES L	9999	UNCLASSIFIED	VOCATIONAL TEACHER	00		TYGER RIVER CORRECTIONAL INSTITUTIO
3/13/06	WILLIAMS PATRICIA A	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		LEATH CORR INSTIT (WOMEN)
2/24/05	WILLIAMS PATRICIA A	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		LEATH CORR INSTIT (WOMEN)
2/9/04	WILLIAMS PATRICIA A	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		LEATH CORR INSTIT (WOMEN)
5/4/98	WILLIAMS, LISA A	JD30	CORR OFF I	OFFICER II	3	E	LIEBER CORR INST
1/17/06	WILSON GAILYA K	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION
9/26/05	WILSON MAVERICK B	9999	UNCLASSIFIED	ADMINISTRATIVE ASSIST	00		LEE CORRECTIONAL INSTITUTION
4/10/06	YARBROUGH LARRY E	UB04	VOCATIONAL TEACHER	VOCATIONAL TEACHER	00		TYGER RIVER CORRECTIONAL INSTITUTIO
11/28/05	YOUNTS LINDA T	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION
11/4/04	YOUNTS LINDA T	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION
12/1/03	YOUNTS LINDA T	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION
11/29/05	ZUVER, SR JAMES B	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		TRENTON CORRECTIONAL INSTITUTION
12/13/04	ZUVER, SR JAMES B	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		TRENTON CORRECTIONAL INSTITUTION
11/28/03	ZUVER, SR JAMES B	9999	UNCLASSIFIED	CLASSROOM TEACHER	00		TRENTON CORRECTIONAL INSTITUTION

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
	C/A NO 04-CP-40-1761
James "Cal" Bell, Othella Bernard,)	
Katherina Bower, Linda M.W Bratton,)	
Ann T Bridges, Rance C Cobb, Jeannie)	
B Croxton, Bernetha L Culbreath,)	
William K. Dreyer, Jacqueline D Farr,)	
Ruth Fritts, Nancy Glenn, Etta Jane)	
Jones, Geneva M Martin, Mary H)	
McCabe, Beverly McClanahan, Max)	
D Randolph, Carolyn McIver Smith,)	
Maggie G Williams and Paula Woodlief,)	
)	
Plaintiffs,)	
)	
vs.)	AFFIDAVIT OF MAX D RANDOLPH
)	
South Carolina Department of)	
Corrections and Palmetto Unified)	
School District No 1,)	
)	
Defendants.)	

Max D Randolph, being first duly sworn, deposes and says

1 On April 11 2003 at approximately 1 30 p m I met Director Ozmint at Tiger River Correctional Institution. I spoke with Director Ozmint at that time regarding the cuts and closings of schools within the Palmetto Unified School District. Also present during this conversation was Mr Williams

2 I told Director Ozmint that the cuts and closings were not required and that it could be handled through attrition or retirement.

3 Director Ozmint responded that with a budget of $300 million that he could afford education but with a budget of $250 million, he could not.

4 Director Ozmint also stated that the teachers sued the South Carolina Department of Corrections to get a raise which he said was wrong.

5 I stated that the teachers sued to be paid what the law required them to be paid.

Further, affiant sayeth not.

Max D Randolph

Sworn to and subscribed before me
this 13 day of September 2006 Nancy M Lee

Notary Public for South Carolina
My commission expires March 17, 2015

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF RICHLAND	)	FOR THE FIFTH JUDICIAL CIRCUIT
James "Cal" Bell, Othella Bernard, Katherina Bower Linda M W Bratton, Ann T Bridges Rance C Cobb Jeannie B Croxton, Bernetha L Culbreath, William K. Dreyer, Jacqueline D Farr, Ruth Fritts Nancy Glenn Etta Jane Jones, Geneva M. Martin Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith Maggie G Williams and Paula Woodlief Plaintiffs/Petitioners -vs- South Carolina Department Corrections and Palmetto Unified School District No 1 Defendants/Respondents	)	Civil Action No 04-CP-40-1761 **MEMORANDUM IN OPPOSITION TO THE PETITIONERS' PETITION FOR JUDICIAL REVIEW**

BARBARA A SCOTT
C C C & G S
2006 DEC 11 AM 10 11
RICHLAND COUNTY
FILED

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(a) SCDC did not develop its 2003 reduction in force policy or implement its 2003 reduction in force plan with a retaliatory motive 19

(b) SCDC has not retaliated against Petitioner Bell or any other Petitioner 20

(c) The claims articulated in Petitioner Randolph s dubiously timed affidavit do not demonstrate that Director Ozmint formulated SCDC's 2003 reduction in force policy and plan with a retaliatory motive 24

V CONCLUSION 27

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF RICHLAND	)	FOR THE FIFTH JUDICIAL CIRCUIT
James 'Cal' Bell, Othella Bernard, Katherina Bower Linda M W Bratton Ann T Bridges Rance C Cobb Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr Ruth Fritts Nancy Glenn, Etta Jane Jones Geneva M. Martin Mary H McCabe, Beverly McClanahan, Max D Randolph Carolyn McIver Smith, Maggie G Williams and Paula Woodlief	)	Civil Action No 04-CP-40-1761
Plaintiffs/Petitioners	)	**MEMORANDUM IN OPPOSITION TO THE PETITIONERS' PETITION FOR JUDICIAL REVIEW**
-vs-	)	
South Carolina Department Corrections and Palmetto Unified School District No 1,	)	
Defendants/Respondents	)	

I SUMMARY OF MATTER SUBJECT TO COURT'S CONSIDERATION

By the Petition for Judicial Review they filed April 6, 2004, the Petitioners have moved this Court for an order remanding their appeal of their collective grievance filed after their separation from employment due to a 2003 reduction in force implemented by the South Carolina Department of Corrections ["SCDC "] back to the State Office of Human Resources [' OHR] for a hearing by the State Employees Grievance Committee pursuant to S C Code Ann § 1-23 380(A)(6) [1]

The Respondents, quite obviously oppose the Petitioner's instant Petition for Judicial Review The Respondents oppose the instant petition, because simply no provision of the

[1] Paragraph 20(a) of the Petitioners Petition for Judicial Review and pp 1 – 2 of Petitioners Memorandum of Law dated October 31 2006

applicable statutes or any reasonable reading of relevant precedent supports the Petitioners grounds in this matter

Ultimately SCDC argues that its 2003 reduction in force policy and plan only violated the interpretation of the applicable statutes and precedent held by the Petitioners' counsel However, its 2003 reduction in force policy and plan simply did not violate the plain and ordinary meaning of the applicable statutes either the individual statutes or the entirety of the applicable statutory section

II STANDARD OF REVIEW

In their supporting memorandum of law dated October 31 2006, the Petitioners stated only OHR denied the Petitioners appeal of SCDC s denial of their grievances "without a hearing pursuant to S C Code Ann § 8-17-340 which applies only to cases which present no material factual issues [2] However a more intense analysis of the applicable statutes is required

As all parties admit the Petitioners filed a collective grievance protesting the termination of their employment by SCDC under the 2003 reduction in force implemented by SCDC

§ 8-17-320(11) defines a grievance as "a complaint filed by a covered employee or the employee s representative regarding an adverse employment action designated in [§ 8-17-310(10)] taken by an agency " § 8-17-320(21) defines a reduction in force as "a determination made by an agency head to eliminate one or more filled positions in one or more organizational units within the agency due to budgetary limitations, shortage of work, or organizational changes

Under § 8-17-330, which is entitled 'Agency employee grievance plans, procedures, appeals ' a covered employee may file a grievance or appeal concerning the following adverse

[2] Petitioners Memorandum of Law p 2

employment actions termination, suspensions, involuntary reassignments, and donations " § 8-17-330 however specifically addresses reductions in force and it provides as follows

> A reduction in force is an adverse employment action considered as a grievance only if the agency, or as an appeal if the State Human Resources Director determines that there is a material issue of fact that the agency inconsistently or improperly applied its reduction in force policy or plan. (emphasis supplied)

§ 8-17-340 which is entitled State Employee Grievance Committee hearings, procedures appeals treats appeals of grievances filed in the aftermath of reductions in force Specifically § 8-17-340(A) provides as follows

> The State Human Resources Director shall forward to the committee for a hearing all appeals which meet jurisdictional requirements and relate to the following adverse employment actions terminations salary decreases based on performance demotions, suspensions for more than ten days and **reductions in force when the State Human Resources Director determines there is a material issue of fact regarding inconsistent or improper application of the agency's reduction in force plan or policy** (emphasis supplied)

Thus under § 8-17-340(A) the State Human Resources Director did not forward the Petitioners' appeal of SCDC s denial of their collective grievance to the State Employee Grievance Committee for hearing, because, the State Human Resources Director like SCDC determined that there was not a material issue of fact regarding SCDC s application of its 2003 reduction in force policy and plan.

The Petitioners filed their instant petition for judicial review under § 8-17-340(F) which provides that a ' [p]etition for judicial review of the final decision may be made by the covered employee to the court of common pleas of the county in which the covered employee s place of employment is located."

Ultimately, § 1-23-380 which is entitled "Judicial Review upon exhaustion of administrative remedies controls the Petitioners instant petition § 1-23-380(A)(5) provides the following

> The review shall be conducted by the court without a jury and shall be confined to the record In cases of alleged irregularities in procedure before the agency not shown in the record proof thereon may be taken in the court The court, upon request, shall hear oral argument and receive written briefs

Finally, § 1-23-380(A)(6) in its entirety, provides the applicable standard of review

> The court shall not substitute its judgment for that of the agency as to the weight of the evidence on questions of fact. The court may affirm the decision of the agency or remand the case for further proceedings The court may reverse or modify the decision of substantial rights of the appellant have been prejudiced because the administrative findings, inferences conclusions, or decisions are
> (a) in violation of constitutional or statutory provisions
> (b) in excess of the statutory authority of the agency
> (c) made upon unlawful procedure,
> (d) affected by other error of law;
> (e) clearly erroneous in view of the reliable probative and substantial evidence on the whole record, or
> (f) arbitrar y or capricious or characterized by abuse of discretion or clearly unwarranted exercise of discretion.

III OVERVIEW OF PETITIONERS' POSITION AND ARGUMENTS

A. PROCEDURAL HISTORY

SCDC agrees with the procedural history articulated by the Petitioners in paragraphs 6 through 13 of their Petition

B GROUNDS FOR REMAND ARTICULATED BY PETITIONERS IN THEIR SUPPORTING MEMORANDUM DATED OCTOBER 31, 2006

In their supporting memorandum of law dated October 31, 2006, the Petitioners submitted the grounds upon which they argue this Court should remand their collective grievance back to OHR

In support of their petition, the Petitioners cited the following precedent Brown v S C State Board of Education, 301 S C 326 391 S E 2d 866 (1990) [3] and Johnson v Spartanburg County School District No 7, 314 S C 340 44 S E 2d 501 (1994) [4]

Ultimately, the Petitioners contended that nine (9) issues of material fact exist by which the Petitioners are entitled to remand for a hearing before the State Employee Grievance Committee According to the Petitioners these nine (9) purported issues of material fact "can only be resolved by affording [them] a proper due process hearing before the State Employee Grievance Committee "[5] These nine (9) purported issues of material fact are as follows

(1) SCDC s purported unjustified division of PUSD No 1 into 11 geographic units as part of its 2003 reduction in force plan,
(2) SCDC s alleged retaliation against the Petitioners in developing its 2003 reduction in force plan as a result of the Petitioners pursuing wage claims against SCDC in Abraham, et al , v Palmetto Unified School District No 1 and South Carolina Department of Corrections, 343 S C 36 538 S E 2d 656 (Ct App 2000),[6]
(3) SCDC's purported failure to place educators affected by its 2003 reduction in force in allegedly vacant positions

[3] Petitioner s Memorandum of Law., p 3 The Petitioners quoted the following passage from Brown, 391 S E.2d at 867 "The right to hold specific employment and the right to follow a chosen profession free from unreasonable governmental interference come within the liberty and property interests protected by the Due Process Clause

[4] Id. According to the Petitioners the Court in Johnson "held that a school district could not reduce an administrator s term of employment or compensation without providing an opportunity to be heard." Of course the Court in Johnson did not have to consider facts at all similar to the facts involved in the instant petition where educators who were SCDC employees under the provisions of § 24-25 90 were subject to a reduction in force instituted by SCDC a correctional authority charged primarily if not exclusively with the incarceration and maintenance of convicted felons

[5] Id., pp 9 – 10

[6] SCDC includes a copy of the Court of Appeals decision in Abraham as Appendix A to this memorandum

(4) SCDC's alleged shielding of at-will, temporary, and grant employees from separation and, instead, separating full-time educators under its 2003 reduction in force plan

(5) SCDC s purported conversion of education positions into unclassified positions with the same duties (i e using non-educators to provide instruction to inmates that educators previously provided to inmates) as part of its 2003 reduction in force

(6) SCDC's decision to purportedly subject a disproportionate number of educators to its 2003 reduction in force in comparison to the remainder of SCDC s employee pool as a whole

(7) SCDC s decision to purportedly subject its education budget to a disproportionate reduction under its 2003 reduction in force as compared to SCDC s entire operating budget as a whole

(8) SCDC s decision to purportedly target senior and consequentially higher salary educators to its 2003 reduction in force in order to obtain a bigger bang for the buck," and, finally,

(9) SCDC's purported failure to include PUSD No 1 s Superintendent and board in the development and implementation of its 2003 reduction in force plan.

IV THIS COURT SHOULD DENY THE PETITIONER'S PETITION FOR JUDICIAL REVIEW

As stated above the Respondents oppose the Petitioners instant Petition for Judicial Review, because simply no provision of the applicable statutes or any reasonable reading of the relevant precedent supports the Petitioners grounds in this matter

A. REVIEW OF *ALL* PUSD No 1's APPLICABLE STATUTES

The General Assembly's enactment of S C Code Ann , § 24-25-10 *et seq* in 1981 established PUSD No 1 and, further controls its operation The statutes at issue in this matter, therefore are § 24-25-10 20 30 35 40 50 60 70 80 and 90[7]

Obviously, the Court is capable of reviewing these statutes on its own initiative, and, normally, SCDC would not labor to provide a comprehensive review of these statutes However, such a review of each relevant statute is necessary, because the Petitioners have based their arguments on a selective and consequentially misleading invocation of only a handful of these

[7] SCDC includes a copy of each of these sections as Appendix B of this memorandum The 2006 versions of these statutes are identical to the versions of these statutes that existed in 2003

statutes Most remarkably, the Petitioners completely ignored, both in their petition and in their supporting memorandum the single most relevant statute to this matter § 24-25-90

1 **§ 24-25-10, 20, 40, 50, 70, and 80**

The Petitioners specifically alleged that both SCDC and PUSD No 1 'are required by law to treat educations according to a statutory unified' school district "[8] Undoubtedly, the Petitioners rely upon § 24-25-10 in making this conclusion. Again § 24-25-10 established the entity known as PUSD No 1 and it reads as follows

> There is hereby established a special statewide unified school district within [SCDC] to be known as the [PUSD No 1]

However an examination regarding the particulars by which PUSD No 1 is staffed and operated does not end with § 24-25 10 As is the case in every instance of statutory interpretation words must be afforded their plain and ordinary meaning[9] Moreover a single statute must be examined within the context of its entire relevant section[10] Unfortunately the Petitioners position and argument is predicated on almost a complete reliance of § 24-25-10 While they also cited § 24-25-40 and 70 in their petition and supporting memorandum, the

[8] Petitioners Memorandum of Law p 4

[9] In Abraham, 538 S E.2d at 663 the very case in which all but three (3) of the Petitioners participated as litigants and the very case the Petitioners contend lead SCDC to retaliate against them by implementing its 2003 reduction in force the Court of Appeals stated as follows

> Furthermore a primary rule of statutory interpretation is that "words must be given their plain and ordinary meaning without resort to a subtle or forced construction which limits or expands the statute s operation. [citations omitted] Thus when a statute contains "clear and unambiguous" terms this Court "must apply those terms according to their literal meaning " [citations omitted] ("In construing statutes, the terms used therein must be taken in their ordinary and popular meaning.")

[10] In Abraham, 538 S.E.2d at 663 the Court of Appeals recited the following additional rules of statute construction

> In construing a statute our primary goal is to ascertain and effectuate the intent of the Legislature [citations omitted] Each provision, therefore "should be given a reasonable construction consistent with the purpose and policy of the Act." [citations omitted]

Petitioners conclusions regarding the viability and legitimacy of PUSD No 1 as a "unified" school district almost exclusively rest upon their interpretation of § 24-25-10

As clearly demonstrated immediately below, a complete examination of the other relevant provisions from this section – an exercise the Petitioners simply failed to undertake – reveals that PUSD No 1 its administrators and educators (including the Petitioners) are SCDC employees

For example § 24-25-20 articulates the purpose of PUSD No 1 It reads as follows:

> The purpose of the district is to enhance the quality and scope of education for inmates **within the Department of Corrections** so that they will be better motivated and better equipped to restore themselves in the community The establishment of this district shall ensure that education programs are available to all inmates with less than a high school diploma, or its equivalent, and that various vocational training programs are made available to selected inmates with the necessary aptitude and desire Where enrollment in an education program must be restricted justification for that restriction should be documented by the district (emphasis supplied)

Obviously, § 24-25-20 recognizes that the "students' of PUSD No 1 are first, last, and always inmates Thus the students" who populate PUSD No 1 are far different than the students who populate nearly every other school district in this state

§ 24-25-40 is entitled Trustees of school district, appointment terms vacancies" The first sentence of § 24-25-40 provides that "[t]he [PUSD No 1] shall be under the control and management of a board of nine trustees **who shall operate the district under the supervision** of [SCDC] " (emphasis supplied) While the Petitioners acknowledge that PUSD No 1 s board consists of nine members under the provisions of § 24-25-40 they simply ignored the reality that PUSD No 1 s board must operate the district under SCDC's supervision. Thus this statute reveals that PUSD No 1, its board of trustees its administrators, and its educators (including the Petitioners) are first, last, and always SCDC employees

This reality is reinforced by § 24-25-50, which is entitled Removal of school board members § 24-25-50 provides, in pertinent part that the members of PUSD No 1's board of trustees **"may be removed at any time for good cause" by SCDC's Director** The Petitioners notion of the PUSD No 1 being an independent, viable, and traditional school district fails in the face of this statute This statute again reinforces the reality that PUSD No 1, its board of trustees, its administrators, and its educators (including the Petitioners) are first, last, and always SCDC employees

§ 24-25-70 is entitled Powers and duties of school board, and it provides that PUSD No 1 s board shall operate as executory agent for the schools under its jurisdiction and shall perform eight (8) specifically enumerated administrative functions [11] However the very first sentence of § 24-25-70 makes clear that PUSD No 1's board shall perform these eight (8) specifically enumerated administrative functions **"with the consent and concurrence of the Director of [SCDC]"** (emphasis supplied) This statute yet again reinforces the reality that PUSD No 1 its board of trustees its administrators and its educators (including the Petitioners) are first, last, and always SCDC employees

§ 24-25-80 is entitled 'Duties of the District Superintendent of Education," and its sets forth seven (7) enumerated duties of PUSD No 1 s Superintendent Unlike the previously examined statutes § 24-25-80 is remarkable for what it does not specify Contrary to the allegations and conclusions offered by the Petitioners and of monumental importance in this matter is the reality that no component of § 24-25-80 provides that PUSD No 1's superintendent shall control the employment, supervision, or termination of any educator employed by SCDC

[11] In their supporting memorandum of law the Petitioners referenced § 24-25 70(7) and stated that our Court of Appeals in Abraham, held that SCDC and PUSD No 1 were required by § 24-25-70(7) "to provide additional compensation to instructors based upon the average of local school supplements throughout the state" However the Petitioners apparently neglected to examine the very first sentence of § 24-25-70

within PUSD No 1 This statute yet again reinforces the reality that PUSD No 1, its board of trustees its administrators and its educators (including the Petitioners) are first, last and always SCDC employees

Ultimately the General Assembly codified this reality in § 24-25-90 which is the very last statute of § 24-25-10 *et seq*

2 **§ 25-24 90 – "The 600 Pound Gorilla"**

§ 24-25-90 is entitled "Superintendent and other personnel to be employed according to Department of Correction policies " It reads as follows

> The superintendent of the [PUSD No 1] and **all other educational personnel shall be employed, supervised, and terminated according to the South Carolina Department of Corrections' personnel policies and procedures** (emphasis supplied)

Remarkably the Petitioners failed to even acknowledge § 24-25-90 anywhere within their petition for judicial review or for that matter in their memorandum of law dated October 31, 2006 § 24-25-90 is the proverbial 600 pound gorilla sitting next to the Petitioners allegations and conclusions The Petitioners undoubtedly know of its existence but refuse to even address its potential impact on their petition

B THOROUGH REVIEW OF RELEVANT COURT OF APPEALS DECISION IN Abraham

Unlike the Petitioners however the Court of Appeals in Abraham not only acknowledged § 24 25 90, but also addressed § 24-25-90 and many of the relevant provisions from § 24-25-10 *et seq*

In fact, the Court of Appeals in Abraham dealt with § 24-25-90 head-on. In just the second paragraph of its Abraham, 538 S E 2d at 658 – 59 the Court of Appeals stated as follows

> In 1981, the General Assembly established a "special statewide unified school district" **within the Department of Corrections** known as

> Palmetto Unified School District No 1 *See* S C Code Ann § 24-25-10 (1989) The District, designed to enhance the quality and scope ' of inmate education with an eye toward reintegrating offenders into the community operates under the control of a Board of Trustees **supervised by the Department of Corrections** *Id.* at **§ 24-25-20** *see* S C Code Ann § 24-25-40 (1989 & Supp 1999) In establishing the District, the Legislature specifically provided for a 'twelve-month school program [with] teachers' pay schedule based on the state and average school supplement pay scales ' S C Code Ann § 24-25-70(7) (1989 & Supp 1999) **The Legislature further required that teachers hired to work in the District ' be employed, supervised, and terminated" according to the policies and procedures of the Department of Corrections** S C Code Ann. **§ 24-25-90 (1989)** (emphasis supplied)

In their petition the Petitioners stated that Abraham emphasized the unified nature of [PUSD No 1] which is a central issue to their claims Accordingly, a comprehensive review of the appellate grounds in Abraham and the Court of Appeals rulings regarding these grounds is necessary

In Abraham, educators employed by SCDC including 17 of the 20 named Petitioners pursued five (5) distinct appellate grounds However, the educators prevailed on only two (2) of these five (5) grounds First the educators articulated a 'pay inequity' ground in which they alleged that both PUSD No 1 and SCDC owed them back pay for 26 days per year based upon PUSD No 1 s uniquely configured year long academic schedule The Court of Appeals denied this ground Second, the educators articulated a ground under our state's Payment of Wages Act § 41-10-10 *et seq* , and this ground related to their 'pay inequity" ground Again the Court of Appeals denied this ground. Third the educators sounded a ' breach of contract" ground in which they grounded that the provisions of § 24-25-10, *et seq* created an employment contract between themselves and PUSD No 1 and/or SCDC and that either PUSD No 1 or SCDC breached the terms of this purported contract. The Court of Appeals also denied this ground

Fourth, the educators argued that they were owed additional pay above the state minimum teachers salary (i e pay commensurate with the average school supplement pay scale) under the plain and ordinary meaning of § 24-25-70(7) and unlike the three (3) grounds discussed above the Court of Appeals agreed Finally, the educators argued that the trial court had erred by concluding that the total compensation package they received from PUSD No 1 and SCDC offset the educators "pay inequity" and average school supplement pay scale" claims Again the Court of Appeals agreed with the educators and concluded that the total compensation package paid by PUSD No 1 and SCDC did not relieve it from compliance with § 24-25-70(7)

In the course of considering the appellate grounds offered by the educators in Abraham, the Court of Appeals, 538 S E 2d at 659 recognized the true relationship between the Petitioners and SCDC by stating that the educations in that case 17 of whom are Petitioners here were "**all current or former educators working as teachers in**" SCDC Additionally, the Court of Appeals 538 S E 2d at 662 declared that PUSD No 1 **as part of** SCDC **clearly has no tax base from which to generate revenue** "

Thus despite the Petitioners best efforts to portray PUSD No 1 as a traditional school district separate and apart from SCDC, the reality is quite different. Abraham only reinforces the reality that PUSD No 1 its board of trustees, its administrators, and its educators (including the Petitioners) are first, last, and always SCDC employees and therefore, are "employed, supervised and terminated according to [SCDC's] personnel policies and procedures under § 24-25-90

C APPLICATION OF ALL STATUTES AND ENTIRETY OF RELEVANT PRECEDENT TO GROUNDS OFFERED BY PETITIONERS

As illustrated above a complete analysis of all relevant provisions of § 24-25-10 *et seq* , and specifically, § 24-25-90 demonstrates that the Petitioners are employed, supervised, and terminated according to SCDC s personnel policies and procedures Our Court of Appeals in Abraham recognized this reality as well In short PUSD No 1 is simply a division of SCDC

Despite this reality, the Petitioners synthesized their interpretation of § 24-25-10, § 24-25-40, § 24-25-70, and Abraham with their view of the record as well as evidence gathered in accordance with Judge Cooper's order and concluded that nine (9) material issues of fact existed and that their existence requires this Court to remand their collective grievance back to OHR for hearing by the State Employees Grievance Committee pursuant to S C Code Ann § 1-23-380(A)(6)

Accordingly SCDC applies the provisions of § 24-25-10, et seq , and specifically, § 24-25-90 to each of the purported issues of material fact immediately below

1 Purported Material Issues of Fact Related to SCDC's Development and Implementation of Its 2003 Reduction in Force Policy and Plan

The **first** of the Petitioners' purported nine (9) material issue of fact consisted of SCDC s purported unjustified division of PUSD No 1 into 11 geographic units as part of its 2003 reduction in force policy and plan The **third** of the Petitioners purported material issues of fact consisted of SCDC s purported failure to place educators affected by its 2003 reduction in force in allegedly vacant positions The **fourth** purported material issue of fact consisted of SCDC's alleged shielding of at-will temporary, and grant employees from separation and instead separating full-time educators under its 2003 reduction in force policy and plan. The **ninth**

purported issue of material fact consisted of SCDC s alleged failure to include PUSD No 1's superintendent and board in the development and implementation of its 2003 reduction in force

No in-depth analysis of these purported issues of fact is necessary, nor is it necessary for SCDC to provide a lengthy refutation of the Petitioners' allegations Even if the Petitioners accurately framed each of the above alleged material issues of fact, the reality is that neither § 24-25-10 nor any reading of Abraham prohibited SCDC from dividing South Carolina into 11 geographic divisions as part of its 2003 reduction in force policy and plan PUSD No 1 is simply not an entity separate from SCDC, therefore SCDC did not err by dividing all of SCDC and hence all of South Carolina into 11 geographic divisions as part of its 2003 reduction in force SCDC's 2003 reduction in force affected more employees than just educators such as the Petitioners As PUSD No 1 s Superintendent, Wendell Blanton, testified during his deposition, PUSD No 1 "encompasses education in SCDC [12] (Blanton Deposition p 20 lines 15 – 23)

Nor did any provision of § 24-25-10 *et seq* or any reading of Abraham require SCDC to place educators affected by its 2003 reduction in force into vacant positions or prohibit SCDC from shielding of at-will temporary, and grant employees from separation in its 2003 reduction in force policy and plan As Mr Blanton testified, all PUSD No 1 personnel are hired employees of SCDC and are not hired under contracts of employment by PUSD No 1 (Blanton Deposition, p 30, line 23 – p 31, line 5) In fact, Mr Blanton confirmed that SCDC and not PUSD No 1 posts vacancies for PUSD No 1 positions and the announcement of a vacancy must be approved by SCDC officials (Blanton Deposition p 35 line 18 – p 38 line 12)

[12] Petitioners' counsel deposed Mr Blanton pursuant to Judge Cooper s order governing discovery in this matter on December 20 2005 SCDC includes relevant extracts of Mr Blanton s deposition testimony as Appendix C to this memorandum.

Finally, neither § 24-25-20, 40 50, 70, nor 80 nor any reading of Abraham required SCDC to consult with PUSD No 1's superintendent or PUSD No 1 s board in the development and implementation of its 2003 reduction in force policy and plan [13] As Mr Blanton testified, he reports not only to PUSD No 1 s board but also to members of Director Ozmint's staff (Blanton Deposition, p 21, lines 1 – 10) Moreover, PUSD No 1's board reports to Director Ozmint and the board s members work at the pleasure of" Director Ozmint.[14] (Blanton Deposition, p 27, lines 1 – p 28 line 22)

While such realities obviously do not conform to the interpretation of § 24-25-10 *et seq* and Abraham consistently foisted by Petitioners' counsel upon SCDC officials during deposition questioning (*see* Near Deposition p 22 line 1 – p 24, line 14) [15] and this Court in the instant petition and supporting memorandum, this Court must nonetheless heed them. As stated by Director Ozmint during his deposition testimony (Ozmint Deposition, p 32 lines 11 – 13) PUSD No 1 is not and was not "some type of separate financial entity from ' SCDC Mr Blanton confirmed that, in accordance with § 24-25-90 all PUSD No 1 education personnel are hired as state employees through [SCDC] " (Blanton Deposition, p 30, lines 19 – 23)

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[13] However SCDC s Director Jon E. Ozmint, in deposition testimony taken June 21 2006 vigorously disputed that SCDC failed to consult with Mr Blanton, regarding the development and implementation of its 2003 reduction in force According to Director Ozmint, SCDC s "educational cuts were based precisely on input from [Mr Blanton] " and, further SCDC s final version of its reduction in force plan "was greatly influenced by what [Mr Blanton] presented to" Director Ozmint and his key staff. (Ozmint Deposition, p 39 lines 1 – 24 and p 43 lines 1 – 11) Mr Blanton also described his substantial input into the development and implementation of SCDC s 2003 reduction in force policy and plan. (Blanton Deposition p 45 line 17 – p 50 line 20) Petitioners counsel deposed Director Ozmint pursuant to Judge Cooper s order governing discovery in this matter on June 21 2006 SCDC includes relevant extracts of Director Ozmint s deposition testimony as Appendix D to this memorandum

[14] See § 24-25-70 and § 24-25-50

[15] Petitioners counsel also deposed John Near SCDC s Human Resources Director on June 21 2006 pursuant to Judge Cooper s order SCDC also includes relevant extracts of Mr Near's deposition testimony as Appendix E to this memorandum

Again § 24-25-90 provides that PUSD No 1's superintendent, its board, and all of its educational personnel including of course, the Petitioners shall be employed, supervised, and terminated according to SCDC s personnel policies and procedures SCDC's 2003 reduction in force policy and plan simply constituted such a policy and procedure under § 24-25-90

2 **Purported Material Issues of Fact Related to SCDC's Education Efforts**

The **fifth** purported issue of material fact consisted of SCDC s conversion of education positions into unclassified positions with the same duties The **sixth** purported issue of material fact consisted of the Petitioners claim that SCDC s 2003 reduction in force affected a disproportionate number of educators in comparison to SCDC as a whole As recounted by the Petitioners, the 2003 reduction in force affected 87 educators 78 of whom were certified instructors or instructional supervisors [16]

The **seventh** purported issue of material fact consisted of the Petitioners claim that SCDC s education budget suffered a disproportionate reduction in comparison to SCDC's budget as a whole As also recounted by the Petitioners, SCDC s total expenditures for fiscal years 2000 – 2004 always exceeded $300 million while during this same period PUSD No 1 s expenditures never exceeded $17 million [17]

According to the Petitioners SCDC's division of the state into 11 geographic areas 'meant that teachers could not use seniority to bump (replace) more recently hired employees in other areas,"[18] and resulted in more senior educators losing their jobs [19] According to the

[16] Petitioners Memorandum of Law p 7

[17] Id. p 8

[18] Id. pp 4 – 5 The Petitioners also referenced Mr Near s deposition testimony pp 22 – 23 and p 33

[19] Id. p. 5

Petitioners, Director Ozmint called the confluence of these actions and results their eighth purported issue of material fact, namely targeting senior educators for elimination pursuant to the reduction in force in order to obtain "more bang for the buck.

Again, even if the Petitioners accurately framed each of the above alleged material issues of fact the reality is that neither § 24-25-10, *et seq*, nor any reading of Abraham prohibited SCDC from converting educational positions into unclassified positions with the same duties or to develop a reduction in force plan that ultimately affected 87 educations 78 of whom were certified instructors or instructional supervisors or finally targeting SCDC s education budget [20]

Nor did any provision of § 24-25-10, *et seq*., or any reading of Abraham prohibit Director Ozmint from assessing SCDC s core missions and making budgetary decisions consistent with his view of SCDC's core missions Obviously the Petitioners place a higher priority on SCDC's education mission and the attendant preservation of the Petitioners positions than Director Ozmint.

However Director Ozmint faced with unexpected and alarming budget deficits when he assumed control of the agency in early 2003 (Ozmint Deposition, p 15 line 11 – p 17, line 24) made the executive decision to implement a reduction in force by which SCDC "could cut the fewest people and save the most money and do it safely " (Ozmint Deposition, p 20, lines 23 – 25) Accordingly Director Ozmint made the executive decision to cut headquarters positions disproportionately especially in comparison to correctional officer and security positions, positions which Director Ozmint deemed critical to the continued operation of the agency (Ozmint Deposition, p 20, line 25 – p 21, line 15 and p 24, line 6 - 24) As part of his

[20] Director Ozmint contends that GED rates for SCDC inmates have increased every year since the 2003 reduction in force (Ozmint Deposition, p 28 line 6 – p 30 line 5) and, consequentially SCDC has reduced the cost of providing instruction by which an inmate may secure his GED by 50 percent as a consequence of the 2003 reduction in force and other measures he implemented (Ozmint Deposition p 28 lines 17 – 20)

assessment and analysis, Director Ozmint recognized the reality that SCDC would enhance the value it received for budgetary dollars spent on temporary employees and part-time instructors as opposed to retaining higher salaried employees (Ozmint Deposition, p 27 line 16 – p 28, line 5) Thus, under Director Ozmint's assessment of SCDC s budget crisis, its staffing needs, and its core missions (Ozmint Deposition p 42, lines 14 – 19) SCDC s 2003 reduction in force policy and plan maximized the bang for the buck" SCDC realized with its operational dollars (Ozmint Deposition, p 41 line 1 – p 42 line 10)

The Petitioners who undoubtedly want this Court to substitute their assessment and analysis of SCDC s 2003 budget crisis 2003 staffing needs, and SCDC's continuing core missions over Director Ozmint's, contend that the purportedly minor savings associated with reducing educators from its workforce simply pales by comparison with the potential savings available from reducing other expenditures However, SCDC and, specifically Director Ozmint are charged with making such decisions *See* Beall v Abbott Laboratories, 130 F 3d 614 620 (4th Cir 1997) ("Finally, Beall cannot show that the decision to collapse her territory was retaliatory Beall's position was eliminated pursuant to a reduction in force at Ross and according to Ross s vacant territory rules Beall has not presented evidence to show that the need for a reduction in force was pretextual or that Ross applied its policy with a retaliatory motive Indeed, Beall has simply not produced sufficient evidence for a reasonable trier of fact to conclude that the decision to eliminate her territory had any relation to Beall's complaint of harassment. Without evidence of pretext for retaliation **this Court will not act as 'super-personnel department that reexamines an entity's business decisions** [citation omitted]" (emphasis supplied)

3 **SCDC's Purported Development and Implementation of its 2003 Reduction in Force Plan as Retaliation against Petitioners for Pursuing their Pay Claims in Court**

(a) SCDC did not develop its 2003 reduction in force policy or implement its 2003 reduction in force plan with a retaliatory motive

The Petitioners sounded perhaps the most egregious of their various grounds for remand in their second purported issue of material fact, namely that SCDC implemented its 2003 reduction in force, which resulted in the Petitioners losing their jobs in a retaliatory manner [21] The Petitioners explicitly alleged that 'their selection for reduction in force was in retaliation for enforcing their right to be paid in compliance with state law' and in violation of laws establishing a so-called "unified school district.[22] According to the Petitioners, the method by which they enforced "their right to be paid in compliance with state law' consisted of civil action, the merits of which were ultimately determined by our Court of Appeals [23] This civil action ultimately became the Court of Appeals' decision in Abraham [24]

Director Ozmint, in response to questioning from Petitioners' counsel during his deposition flatly denied that any retaliatory motive existed regarding his agency s 2003 reduction in force In fact, Director Ozmint stated that he only learned about educators suit in Abraham after the decision making process concerning the 2003 reduction in force was well underway (Ozmint Deposition, p 41, lines 1 – p 42, line 10)

[21] Petitioners Memorandum of Law p 3

[22] Id. p 4

[23] Id.

[24] Id

Moreover the rationale Director Ozmint provided concerning the rationale behind the 2003 reduction in force, as detailed in Section IV(C)(2) above completely belies the Petitioners retaliation claim

(b) SCDC has not retaliated against Petitioner Bell or any other Petitioner

The Petitioners also claim that they possess evidence which shows alleged continuing retaliation against the Petitioners [25] Specifically the Petitioners allege that Petitioner James "Cal Bell s application for a position as a certified vocational teacher at Tyger River Correctional Institution was rejected as part of an on-going effort to retaliate against educators who participated in the Abraham suit.[26]

In an affidavit executed by Petitioner Bell he stated that, in February 2006 he 'applied and interviewed for a teaching position at Tyger River Correctional Institute that used the teacher pay schedule [27]" Petitioner Bell was the only SCDC employee who had been previously affected by the 2003 reduction in force as well as the only SCDC employee to apply for this position.[28] SCDC did not hire Petitioner Bell, and, instead, SCDC hired the competing applicant whom according to Petitioner Bell ' did not have teaching experience or a teaching certificate [29]' Moreover Petitioner Bell's counsel alleged that SCDC "records establish that [Bell s] interview

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[25] Id., p 6

[26] Id.

[27] See Tab I of Attachment 1 to the Petitioners supporting memorandum.

[28] Id.

[29] Id

score was reduced so that' SCDC would hire the only other person who applied for the position[30]

However, the documents that the Petitioners rely upon in making this claim, the deposition testimony of both Director Ozmint and SCDC s Human Resources Director, John Near, and the documents that the Petitioners counsel *omitted* from the compendium of documents they submitted to the Court with their supporting memorandum fatally undermine this claim

First, SCDC s purported retaliation against Bell is fatally undermined by the reality that SCDC officials granted Bell a waiver in order for him to even apply for the teaching position in question The very first document that appears at Tab J-1 of the Petitioners compendium of documents is a document bearing Bell's name, bearing the date ' 02/09/06 in the upper right hand corner, and entitled Applicant Referral Report At the bottom right corner of this page appears a handwritten note dated "2/15/06" and made by SCDC employee Connie Riley This note reads as follows

> Originally 524 due to still being on probationary status Very difficult position to fill S/O wants to consider policy admin 11 28 requirement waived.

Mr Near deciphered this note for the parties during his deposition Under questioning from Petitioners' counsel Mr Near stated that code "524" indicated that Mr Bell could not "make a lateral or downward move during their initial six months or probationary period within' SCDC (Near Deposition, p 55, lines 10 – 15) Mr Near further stated that Mr Bell's start date at Perry Correctional Institution as program coordinator was January 2006 According to Mr Near, since Bell had just started as program coordinator at Perry in January 2006 he needed SCDC to grant him a waiver in order for SCDC to consider him for the position at Tyger River

[30] Petitioners Memorandum of Law p 6

in February 2006 And, as the position at Tyger River was by Ms Riley's assessment very difficult to fill, SCDC s ' S/O or selecting official wanted such a waiver granted As the record reflects SCDC granted such a waiver and considered Bell for the position at Tyger River

Thus, if SCDC intended to retaliate against Bell as a result of his participation in Abraham or this matter, why would SCDC grant him a waiver by which he could even be considered for the teaching position at Tyger River? In short, SCDC would not have done so if it was engaged in such purported continuing retaliation

Of course if an illegitimate reason exists for SCDC s selection of the other applicant over Bell, it has nothing to do with a continuing course of retaliation Such a reason lies within documents that Petitioners' counsel did not include in the documents it submitted to this Court

While Petitioners' counsel included extracts from the other applicant s employment application at Tab J-2 of their compendium of documents they selectively omitted the first three (3) pages of the applicant's application On the third page of the application, the applicant informed SCDC that his brother-in-law worked for SCDC at Tyger River [31]

Moreover, Petitioners' counsel selectively omitted a form entitled ' REPORT OF EMPLOYEE AND/OR INMATE RELATIVE" that a representative of SCDC's Recruiting & Employment Services Branch" sent to Mr Near [32] This form shows that the competing applicant's brother-in-law served as Associate Warden at Tyger River [33]

Petitioners' counsel received these forms from SCDC's undersigned counsel before their June 21, 2006 depositions of Mr Near and Director Ozmint the transcripts of their depositions clearly show discussions between Petitioners' counsel Near, and Ozmint about these forms and

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[31] SCDC includes this page of the applicant s application as Appendix F to this memorandum

[32] SCDC includes this form as Appendix G to this memorandum

[33] Id

the relationship between Bell's competing applicant and Tyger River's Associate Warden (Near Deposition, p 52, line 18 – p 53 line 4 Ozmint Deposition, p 72 line 8 – 15)

Ultimately, Respondents counsel hit upon a legitimate line of inquiry concerning SCDC's decision not to select Bell for the teaching position at Tyger River possible nepotism

Respondents' counsel concluded a series of questions it put to Mr Near concerning changes appearing on some of the Applicant Evaluation forms completed by SCDC officials who interviewed Bell and his competing applicant as follows

> You think it's more than coincidental that [Bell s competing applicant] is a brother-in-law of [one of the officials who interviewed both Bell and the competing applicant s] boss and she changed her rating of [Bell's competing applicant]?
>
> It would raise your suspicion in your mind as a supervisor if someone came to you and said, gee John [one of the officials who interviewed both Bell and the competing applicant] changed this and because of this change [Bell s competing applicant] the son-in-law of her boss, got the job? Wouldn't that make you ask [one of the officials who interviewed both Bell and the competing applicant] why she changed [her applicant evaluation form]? (Near Deposition, p 61 line 13 – p 62 line 2)

Respondents' counsel concluded a series of questions it put to Director Ozmint concerning changes appearing on some of the Applicant Evaluation" forms completed by SCDC officials who interviewed Bell and his competing applicant by asking Director Ozmint the following question

> So nothing you see here rises to the level of even though [Bell's competing applicant] is the brother in-law of the Associate Warden, and even though [one of the officials who interviewed both Bell and the competing applicant] works in Tyger River, and even though there were changes [to the applicant evaluation forms] which coincidentally resulted in [Bell's competing applicant] getting this job, none of that would rise to a level of suspicion for you? (Ozmint Deposition p 72 lines 8 – 15)

At no point in either Mr Near's deposition or Director Ozmint's deposition did Petitioners' counsel attempt to link SCDC s decision not to hire Bell to continuing retaliation

against Bell for his participation in Abraham or this petition Instead Respondents' counsel simply queried both Mr Near and Director Ozmint about inferences drawn from documentary evidence SCDC produced in the course of litigating of this petition

As absolutely no evidence exists which would support a conclusion let alone an inference that SCDC retaliated against Bell because of his involvement in Abraham or this matter by denying him the teaching position at Tyger River, this Court should reject any such argument from Petitioners' counsel

(c) The claims articulated in Petitioner Randolph's dubiously timed affidavit do not demonstrate that Director Ozmint formulated SCDC's 2003 reduction in force policy and plan with a retaliatory motive

Finally, the Petitioners claim that the real motivation behind the structure of the 2003 reduction in force is evidenced by the affidavit of Petitioner, Max D Randolph.[34] In an affidavit executed only recently, specifically September 13, 2006 Petitioner Randolph conveniently recalled the substance of a discussion that occurred between him and Director Ozmint on April 11 2003 at approximately 1 30 p m [35] In his affidavit, Petitioner Randolph recalled suggesting to Director Ozmint that educator separations could be handled through attrition or retirement.[36] Petitioner Randolph then vividly recalled Director Ozmint s response, a response in which Director Ozmint purportedly commented that the educators who sued SCDC in Abraham to get a raise were "wrong" to do so, and, further, a response in which Director Ozmint purportedly

[34] Id., p 7

[35] See Tab S of Attachment 1 to the Petitioners supporting memorandum.

[36] Petitioners Memorandum of Law p 8

commented that he could afford "education with an overall budget of $300 million but he could not afford "education with an overall budget of only $250 million [37]

As the Petitioners' acknowledge Defendant Ozmint denies ever stating that the educators, including 17 of the Petitioners were 'wrong' to sue SCDC for higher pay in Abraham [38] Petitioners' counsel asked Director Ozmint if he ever made the statements attributed to him by Petitioner Randolph during his deposition, and Defendant Ozmint denied making any such statements (Ozmint Deposition p 39 line 25 – p 42 line 10)

SCDC urges the Court to view Petitioner Randolph s September 13 2006 affidavit with an exceedingly skeptical eye To say the least it is miraculous for the Petitioners on the eve of the Court s hearing of their Petition, to produce an affidavit in which a named petitioner in this matter recalls a conversation with Director Ozmint from nearly 3 ½ years earlier, a conversation in which Director Ozmint purportedly provided the very evidence of retaliation that would perhaps compel this Court to remand this matter back to OHR for hearing

Obviously the Petitioners will claim that the difference in recollections between Petitioner Randolph and Director Ozmint constitutes the basis for this Court to determine that a material fact exists regarding whether SCDC s 2003 reduction in force was developed and implemented against the Petitioners in retaliation for the participation in Abraham

Moreover, the remarks attributed by Petitioner Randolph in his September 13 2006 affidavit to Director Ozmint do not "close the loop" between Director Ozmint s purported comments and actual retaliation by SCDC in the implementation of its 2003 reduction in force Even if Defendant Ozmint made comments remotely similar to those recounted in Petitioner

[37] Petitioner s Memorandum of Law p 8 and Tab S

[38] Petitioners Memorandum of Law p 8

Randolph's affidavit, these comments do not represent any kind of "smoking gun" or causal link between Director Ozmint s opinions and the true motive behind the 2003 reduction in force

Moreover, analogous case law presents a different reality As the Petitioners have produced no other affidavits that corroborate the purported conversation between Petitioner Randolph and Director Ozmint in April 2003 or any other affidavits detailing similar comments from Director Ozmint,[39] the Petitioners are left with only the exceedingly dubious affidavit from Petitioner Randolph Thus the comments attributed by Petitioner Randolph to Director Ozmint represent merely stray comments made by Director Ozmint, and, accordingly do not constitute any genuine evidence of a retaliatory motive *See* Brinkey v Harbour Recreation Club, 180 F 3d 598, 608 (4th Cir 1999) ("Thus to prove discriminatory animus the derogatory remark cannot be stray or isolated and [u]nless the remarks upon which plaintiff relies were related to the employment decision in question, they cannot be evidence of [discrimination] [citation omitted] Here, the remark was an isolated event, the record reflects that Brandel only uttered it once Further, it is plain that there is no nexus between the remark and Brinkley s eventual termination from HRC ") See also Fairclough v Board of County Commissioners of St. Mary's County (Maryland), 244 F Supp 2d 581 587 – 88 (D Md 2003)

[39] In his September 13 2006 affidavit, Petitioner Randolph claimed that a "Mr Williams" was also present during his April 11 2003 conversation with Director Ozmint. See Tab S of Attachment 1 to the Petitioners supporting memorandum. However neither Petitioner Randolph nor Petitioners counsel have to date further identified "Mr Williams" or produced a corroborating affidavit from this Mr Williams "

V CONCLUSION

For the above stated reasons SCDC respectfully moves this Court to deny the Petitioners' Petition for Judicial Review

Respectfully submitted,

BY _____
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ATTORNEYS FOR THE RESPONDENTS

Columbia, South Carolina
December 11 2006

CERTIFICATE OF SERVICE

This is to certify that I have, on this date, caused to be served a copy of the Respondents' **MEMORANDUM IN OPPOSITION TO THE PETITIONER'S PETITION FOR JUDICIAL REVIEW** upon the below listed counsel for the Petitioners via hand delivery to the Petitioners counsel at the following address

W Allen Nickels, III Esquire
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RICHLAND COUNTY
FILED
2006 DEC 11 AM 10:11
BARBARA A SCOTT
C C C & G S

Lake E Summers

Columbia, South Carolina
December 11, 2006

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF RICHLAND	)	FOR THE FIFTH JUDICIAL CIRCUIT
James 'Cal" Bell, Othella Bernard Kathenna Bower Linda M W Bratton, Ann T Bridges Rance C Cobb Jeannie B Croxton, Bernetha L. Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts Nancy Glenn Etta Jane Jones Geneva M Martin Mary H McCabe, Beverly McClanahan, Max D Randolph Carolyn McIver Smith, Maggie G Williams and Paula Woodlief,	)	Civil Action No 04-CP-40-1761
Plaintiffs/Petitioners,	)	**MEMORANDUM IN OPPOSITION TO THE PETITIONERS' PETITION FOR JUDICIAL REVIEW**
-vs-	)	
South Carolina Department Corrections and Palmetto Unified School District No 1,	)	
Defendants/Respondents	)	

APPENDIX A

Westlaw
538 S E 2d 656
343 S C 36 538 S E 2d 656 149 Ed. Law Rep 909 6 Wage & Hour Cas.2d (BNA) 700
(Cite as 343 S C 36 538 S E.2d 656)

H

Court of Appeals of South Carolina.
Geraldine ABRAHAM Marie Brice Adams James R. Archie Diane N Austin Jeannete P Austin Thurston Bagnal Ellen S Bailey Shelley B Baker Alice G Balot Dedra Baskin Horace M Bass Helen P Becote, James Cal Bell Othella R. Bernard, Johnnie T Bias John Bodie, Richard L. Boland, Katherina W Bolden Jewell B Bounds Frank A Boxx Patricia Bradley Linda M.W Bratton Ann T Bridges Robert C Brown, Rosalind Patton Brown Burke Brown, Heyward Brunson Warren A Burch Pamela B Burnett, Mary H Cawthon Clarence A Clark, Jr., James F Clark Rance C Cobb Gary G Cook Dr Sandra C Cook Jeannie Bates Croxton Bernetha L. Culbreath, Robert W Danforth Ron M Davis Sylvia D Deal Wadonna Wilson Dedmondt Loretta A Demko Randolph H Dillingham Rex M Divine John W Dodge William K. Dreyer John B Eddings Eileen L. Englert Darlene English-Davis Jacqueline D Farr Johnny Floyd, Kathy Freeman Dr Ruth Fritts Cecil B Gainey Jr Juanita Rose Gilbert; Otis Allen Givens Jr Nancy B Glenn John W Glover Roger W Goodman Alfonzo Greene James L Hall Lucius D Hand, Mary Gene Hayes Arnold Brooks Henderson, Jr., Troy Henegan Jeffrey M Holbrooks, Toni S Hopper Michael S Houck Mary M Hudson Patricia Hudson Sandra M. Hummel James Leonard Jeffcoat; Grayson P Jefferies Jr Linda D Johnson Etta Jane Jones Elois Chappell Jones Arnold E. Karr; Bobby L. Kinard, Deloris LaBrew Mary C Lowder Thomas E Malik William Terry Marinko Andrew E Marshall Myrtle J Marshall Willie M McKay John Richard McLeod; Harry W Medlin Grace M Mitchum Robert W Mobley Thomas E. Moore Johnny L Murdaugh, Theron Mark Phillips Adaline J Pyatt; Charlotte M Ramsey Max Dean Randolph Alma L Reid Steve Scott Rexrode Gerald B Ritchie Charles E. Roache Nathan Robinson Helen D Rogers Leonard P Rogers Eunice Rowell Rose M B Ruger Hoyt Ray Sharpe Henry J Siegfried Maurie M Singletary Carolyn McIver Smith Luther E Smith Mary V Starks Boyd S Stokes William A Strickland Howard J Teufel David A Theodore Donald C Thomas Beverly Thompson Jacqueline L Venning W Daniel Vinson III Charles L. Williams Maggie L. Williams Loretta R. Wilson Yvonne Williams Wilson Paula L Woodlief Carol R. Wright, James Byron Zuver Sr Appellants
v
PALMETTO UNIFIED SCHOOL DISTRICT NO 1 and South Carolina Department of Corrections Respondents.
No 3239

Heard June 8 2000
Decided Sept 11 2000
Rehearing Denied Dec 16 2000

Teachers who worked in prison school district brought action against school district and Department of Corrections (DOC) alleging that defendants failed to compensate them as provided by law The Circuit Court, Richland County J Ernest Kinard Jr J., granted summary judgment for defendants, and teachers appealed. The Court of Appeals Shuler, J held that. (1) teachers were not compensated less than public school teachers (2) statutes governing compensation did not create employment contract; (3) teachers were entitled to salary supplement; and (4) provision of benefits did not relieve defendants of obligation to pay teachers as required by law

Affirmed in part, reversed in part, and remanded.

West Headnotes

[1] Judgment 181(2)
228k181(2) Most Cited Cases
Summary judgment is appropriate where the facts of a case are undisputed.

[2] Prisons 8
310k8 Most Cited Cases
Teachers who worked in corrections school district

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on twelve-month schedule were compensated at same rate as public school teachers, despite teachers claims that they were not compensated for holidays and vacation time as year-round teachers worked 235 days as compared to 190-day work year for public school teachers, and corrections school district teachers were paid 124 percent of public school teachers salaries

[3] Prisons 8
310k8 Most Cited Cases
Statutory provisions governing compensation, salary adjustments and annual leave did not create employment contract between corrections school district teachers, school district, and Department of Corrections (DOC) as statutes did not evidence any intent by General Assembly to create contractual rights

[4] Appeal and Error 671(5)
30k671(5) Most Cited Cases

[4] Appeal and Error 1078(1)
30k1078(1) Most Cited Cases
Corrections school district teachers who alleged that their level of compensation breached their employment contract abandoned their claim that employee handbook gave rise to employment contract because they did not argue issue on appeal and even if teachers had raised argument, appellate court could not address it, as teachers failed to include entire handbook in record on appeal

[5] Prisons 8
310k8 Most Cited Cases
Statute that directed school board to establish pay scales for teachers in twelve month corrections system school program required board to pay teachers salary supplement in addition to state-wide minimum salary based on state wide supplement average as interpreting term "average school supplement" to mean that board was only require to pay state minimum salary would be untenable and use of plural term "scales" evinced intention to pay teachers based on two schedules state pay scale and average school supplement scale Code 1976, § 24-25-70(7).

[6] Statutes 181(1)
361k181(1) Most Cited Cases
In construing a statute, the Court of Appeals' primary goal is to ascertain and effectuate the intent of the Legislature

[7] Statutes 184
361k184 Most Cited Cases
Each provision of a statute should be given a reasonable construction consistent with the purpose and policy of the statute

[8] Statutes 188
361k188 Most Cited Cases
Legislative intent should be ascertained primarily from the plain language of the statute

[9] Statutes 188
361k188 Most Cited Cases
A primary rule of statutory interpretation is that words must be given their plain and ordinary meaning without resort to a subtle or forced construction which limits or expands the statute s operation

[10] Statutes 189
361k189 Most Cited Cases
When a statute contains clear and unambiguous terms the Court of Appeals must apply those terms according to their literal meaning

[11] Labor and Employment 2173(2)
231Hk2173(2) Most Cited Cases
(Formerly 255k79 Master and Servant)
Payment of Wages Act is remedial legislation designed to protect working people and assist them in collecting compensation wrongfully withheld. Code 1976, § 41 10 10 et seq

[12] Prisons 8
310k8 Most Cited Cases
Fact that benefits received by teachers in corrections department school district exceeded those received by teachers in public school districts did not relieve Department of Corrections and school district from obligation to pay teachers according to law as nothing in overall legislative scheme governing pay permitted extra benefits to be set-off against teachers' salaries.
**658*40 W Allen Nickles, III, of Gergel, Nickles & Solomon of Columbia, for appellants

Michael H Montgomery, of Montgomery Potts, Pickren & Novak, of Columbia, for respondents.

SHULER, Judge

In this schoolteacher wage dispute the trial court granted summary judgment to defendants Palmetto Unified School District No 1 and South Carolina

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Department of Corrections (Employers") Geraldine Abraham, et al. (collectively "Employees") appeal. We affirm in part, reverse in part, and remand

FACTS/PROCEDURAL HISTORY

In 1981, the General Assembly established a "special statewide unified school district" within the Department of Corrections known as Palmetto Unified School District No 1 *See* S C Code Ann § 24-25-10 (1989) The District, designed to "enhance the quality and scope" of inmate education with an eye toward reintegrating offenders into the community operates under the control of a Board of Trustees supervised by the Department of Corrections *Id.* at § 24-25 20· *see* S.C Code Ann § 24-25-40 (1989 & Supp 1999) In establishing the District, the Legislature specifically provided for a "twelve-month school program [with] teachers pay schedule based on the state and average school supplement pay scales " S C.Code Ann § 24 25 70(7) (1989 & Supp 1999) The Legislature further required that teachers hired to work in the District "be employed, **659 supervised, and terminated" according *41 to the policies and procedures of the Department of Corrections S C Code Ann § 24 25 90 (1989)

Employees are all current or former educators working as teachers in the South Carolina correctional system On September 25 1995 Employees filed a complaint, amended on October 12 alleging Employers failed to compensate them as provided by law [FN1] Employees subsequently moved for summary judgment on December 11 1996 the trial court denied the motion on February 24, 1998 Thereafter on March 20 Employers filed a motion for summary judgment. Following a hearing, the trial court granted their motion finding Employees can prove no set of facts that would entitle them to any relief " Pursuant to Rule 59(e), SCRCP, Employees filed a timely motion to reconsider On March 17 1999 the trial court issued an amended order confirming summary judgment to Employers. This appeal followed

FN1. By consent, various plaintiffs were added and/or deleted in orders filed in August 1997 and March and November 1998

LAW/ANALYSIS

Standard of Review

[1] A motion for summary judgment should be granted when it is clear there is no genuine issue of material fact and the movant is entitled to judgment as a matter of law Rule 56(c), SCRCP, *Adamson v. Richland County Sch. Dist. One*, 332 S C. 121, 503 S.E 2d 752 (Ct.App 1998) In particular summary judgment is appropriate where the facts of the case are undisputed. *See Trico Surveying, Inc. v Godley Auction Co.*, 314 S C. 542, 544, 431 S.E 2d 565, 566 (1993) ("Summary judgment can be granted when plain, palpable and undisputable facts exist on which reasonable minds cannot differ ') (quoting *Byerly v Connor*, 307 S C. 441, 445, 415 S E 2d 796, 799 (1992)) *Staubes v City of Folly Beach*, 331 S C. 192, 500 S E 2d 160 (Ct.App 1998). The parties herein concede no issues of material fact exist. Accordingly the questions presented for this Court's determination involve the purely legal concern of whether Employees are in fact paid according to law

*42 I. Twelve-Month Work Schedule

[2] Employees first argue they are not paid as required by law because Employers have failed to compensate them for their twelve-month work schedule Employees who by the terms of their employment agree to teach five days a week year-round, claim Employers are improperly deducting holidays and annual leave from the number of work days for which they must account. We disagree

The total number of days available for Employees to work in any given year is 261 (365 total days per year minus 104 weekend days each year) Employers calculate Employee pay based on the fact that, of this total, Employees must be present physically on the job for 235 days each year (261 work days minus 15 days of annual leave plus 11 official state holidays) Employees contend this method of determining compensation means they are not getting paid for 26 days of "work" time that must be accounted for (either by annual leave or an official holiday) Employees argument, however misapprehends the nature of their base pay determination.

When the District initially was formed, the 235-day figure was used to compute Employees' annual compensation because "[i]t was the ratio of Palmetto Unified School District s accountable years and work days to the ratio of the geographic district teachers work year and work days within that work year " In other words, the ratio of days actually worked by Employees (235 out of a possible 261 days available in a 52 week work year) is exactly the same as that for public school teachers (190 days out of 210 available in a 42-week work year) Regarding the comparison to public school teachers, Employers' expert Carl Garris noted

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I m saying that there s three ways you can look at it. But in any event, you ve got .. your measuring rod has to be the same You ve got to compare apples to apples or oranges to oranges If you want to talk **660 about base it on work days the ratio is 190 to 235 If you want to talk about the total period of time in which they are required to carry out their work, then the comparison is 210 days to 26[1] days If you want to base it on weeks, it's 42 weeks *43 versus 52 weeks and under all three scenarios, the ratio comes out to be 124 percent
(Garris Dep at 37)

Another expert, Dr Jesse Teel reached a similar conclusion

Department of Corrections teachers work 235 days per year which is 124 percent of the 190 day work year that South Carolina public school teachers perform Additionally Department teachers[']base pay is approximately 124 percent of base pay for .. public school teachers with the same credentials and experience Further both Department teachers and public school teachers are not required to work on holidays when their respective schools are closed and neither group s pay is reduced for not working these holidays as would be the case with hourly workers Last, Department teachers receive 15 days of vacation time each year and their pay is not reduced for not working these days. In fact, Department teachers can accrue up to 45 vacation days and be paid for these days if they leave the Department of Corrections This obviously implies that they already receive pay for their vacation days
(Teel Aff at 3-4) Finally Sam O'Kelley Deputy Director of Administration for the Department of Corrections confirmed the testimony of both experts

[I]t was a way of generating the pay schedule In effect what we did is we took the State [public school teacher] minimum which was based on 190 days, got the daily rate of pay and then simply multiplied that figure by 235 and that would have given us the annualized equivalent ..
(O Kelley Dep at 11)

Without question Employees are paid semi-monthly (twenty four times a year) on an annual, salaried basis. (Coleman Dep at 69) In other words Employees agree to "perform a job with certain responsibilities for a specified dollar amount over a period of time " in this case one year (Garris Dep at 30) Accordingly, they are paid the same amount each pay period regardless of whether they have taken annual leave or an official holiday (Coleman Dep at 70 Strawhorn Dep at 46) Because Employees are compensated at a rate that is *44 124% of public teacher salaries for working a schedule that is 24% longer we find no merit in their assertion of pay inequity We therefore affirm the grant of summary judgment on this issue

II. Breach of Contract

[3] Employees next argue Employers' alleged violations of their statutory rights to compensation based on a twelve month schedule state mandatory minimum salary and entitlement to annual leave constitute a breach of contract. Because Employees failed to prove the existence of any contracts of employment, this issue is meritless

Unlike public school teachers, teachers within the Department of Corrections do not operate under written employment contracts Employees however assert the absence of written contracts does not deprive them "of contractual rights based in unequivocal policy and mandatory law " While this indeed may be true Employees must still carry their burden of producing evidence of employment contracts, either express or implied *See* Prescott v Farmers Telephone Co-op , Inc., 335 S C 330, 336, 516 S.E.2d 923, 926 (1999) ("In order to prove the existence of a definite contract of employment, the employee must establish all of the elements of a contract ")

Employees contend various statutory provisions governing compensation, salary adjustments and annual leave evidence contracts of employment with Employers. We disagree

[4] In *Alston v. City of Camden*, 322 S C 38, 45, 471 S E 2d 174, 177 (1996), our supreme court stated that South Carolina law is clear that public employees generally have no contractual rights in their employment merely by virtue of a statute describing the **661 terms of that employment." [FN2] Furthermore the court explained, there is a presumption in this state "that statutes regulating salaries and benefits of public employees *45 do not create contractual rights for the employees whose salaries and benefits the statutes set." *Id.* Finally the court cited the general rule applicable when analyzing whether a private contract arises from statutory law "[A]bsent some clear indication that the legislature intends to bind itself contractually the presumption is that a law is not intended to create private contractual or vested rights but merely declares a policy to be pursued until the legislature shall ordain otherwise. " *Id* at 46, 471 S E 2d at 178

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(quoting *Dodge v Board of Educ.*, 302 U S 74, 79, 58 S Ct. 98, 82 L.Ed 57 (1937)) As none of the statutes cited by Employees evidences *any* intent by the General Assembly to create contractual rights therein we must presume they are mere declarations of governmental policy rather than codifications of vested rights giving rise to private causes of action. Accordingly because Employees failed to prove any contracts of employment with Employers the trial court did not err in granting summary judgment to Employers on this issue. [FN3]

FN2 Employees' reliance on *Armstrong v Sch. Dist, Five of Lexington and Richland Counties*, 26 F Supp 2d 789 (D S C 1998), to support their assertion that *Alston* is inapplicable is misplaced. In *Armstrong*, the plaintiffs were public school teachers operating under *written contracts* of employment, a fact the *Armstrong* court noted in its opinion *See id.* at 795 ([U]nlike the Plaintiffs here the *Alston* employees had no employment contracts and no statute which required the issuance of contracts)

FN3 We note here that the trial court, in summarily rejecting Employees breach of contract claims, primarily relied upon the validity of the disclaimer in the Department of Corrections' employee handbook On appeal however Employees do not argue the handbook gave rise to any contracts of employment. Employees therefore have now abandoned the handbook argument. *See e.g. First Sav Bank v McLean*, 314 S C 361, 444 S E.2d 513 (1994) (issues not argued in the appellate briefs are deemed abandoned) Furthermore, even if they had not abandoned the handbook theory we would be unable to address it as Employees failed to include the entire handbook in the record on appeal *See Fleming v Borden, Inc.*, 316 S C. 452, 464, 450 S E.2d 589, 596 (1994) ("[T]he disclaimer is merely one factor to consider in ascertaining whether the handbook as a whole conveys credible promises that should be enforced.... Thus, .. the entire handbook including any disclaimer should be considered in determining whether the handbook gives rise to a promise, an expectation and a benefit.") (quoting Stephen F Befort, *Employee Handbooks and the Legal Effect of Disclaimers*, 13 Indus Rel L.J 326, 375 76 (1991 92)) *Crestwood Golf Club, Inc v Potter*, 328 S.C 201, 493 S E 2d 826 (1997) (appellant bears the burden of providing the appellate court with a sufficient record to review any assertions of error)

III Section 24-25-70(7)

[5] Next, Employees assert the trial court erred in failing to find the express terms of § 24-25-70(7) require Employers to pay them a salary supplement based on the statewide school district average in addition to the state mandatory *46 minimum salary Enacted in 1981 section 24-25 70 directs the District s governing Board to discharge the following administrative function

> [E]stablish a twelve-month school program and teachers' pay schedule based on the state and average school supplement pay scales[ ]

S C Code Ann § 24-25-70(7) (1989 & Supp.1999) [FN4] Employees do not dispute that Employers base their pay schedules on the state minimum as prescribed by law Rather Employees assert § 24-25-70(7) also imposes on Employers a requirement to pay them a salary supplement based on the "average school supplement." We agree.

FN4 This provision remained without modification in 1993 when the Department of Corrections became a cabinet agency *See* S C Ann § 24 25 70(7) (1989 & Supp 1999)

Initially we believe a brief explication of how public school teachers in the state are paid will be helpful to our analysis Public education in South Carolina is funded with resources from the federal state and local governments *See Abbeville County Sch. Dist. v State*, 335 S C 58, 515 S E 2d 535 (1999) State funds are disseminated primarily through two mechanisms established by the General Assembly the Education Finance Act of 1977 (EFA) and the 1984 Education Improvement Act (EIA) *See id.*, S C Code Ann § 59-20-10 *et seq* (1990 & Supp 1999) S C Code Ann. § § 59 21-420 to -450 (1990 & Supp 1999)

**662 The EFA mandates a statewide minimum salary schedule for certified instructional personnel. *Richland County Sch. Dist. Two v South Carolina Dep't of Educ.*, 335 S C. 491, 517 S E.2d 444 (Ct.App 1999), *see* S.C.Code Ann. § § 59-20-10 *et seq* (1990 & Supp 1999). To accomplish this goal, the EFA distributes monies to public school districts using a "wealth-sensitive" formula, which results in

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poorer districts receiving proportionately more state funding than wealthier ones *See Abbeville County*, 335 S C at 64, 515 S.E.2d at 538. *Richland County v Campbell*, 294 S C. 346, 364 S.E 2d 470 (1988) Funds under the EIA on the other hand are distributed without regard to a district's tax base *Abbeville County*, 335 S C at 64, 515 S E.2d at 538 In effect, the EIA amended the EFA to provide additional state funds to school districts in *47 order to raise public teacher salaries to the southeastern average *See Richland County Sch. Dist. Two*, 335 S C at 497, 517 S E 2d at 448. S.C Code Ann § 59-20-50(4)(b) (1990 & Supp 1999) As noted by Employers expert Carl Garris the EFA and EIA now operate in tandem to establish the "state minimum" salary for public school teachers (Garris Dep at 51 53)

Many school districts however augment the required state minimum salary with additional "local supplements" Such supplements, clearly voluntary and thus contingent upon each district s local tax base are utilized to meet a particular district s needs, i e attracting teachers with specific qualifications or retaining those with valuable experience *See Richland County Sch Dist Two*, 335 S C at 493, 517 S E 2d at 446 (Teacher's [sic] salaries now contain a combination of EFA funds, EIA funds, and *optional* local salary supplements.") (emphasis added). In any event, it is important to note that "for every dollar a school district increases their local salary supplement, the EIA funds provided by the [s]tate decrease by an equal dollar amount." *Id.* at 497 98, 517 S.E.2d at 448 In other words "[a] teacher's [minimum] salary is now computed by adding (a) the EFA base salary amount, (b) the local salary supplements and (c) then using the EIA funds as a plug to ensure the total teacher's salary equates with the southeastern average. *Id.* As a result, some wealthier school districts receive no EIA funds because they pay supplements which raise teacher salaries well above the southeastern average/state minimum It is these supplemental funds which are at issue in this case

Employers argue, and the trial court found, that the statutory language "average school supplement does not entitle Employees to an additional amount above and beyond the state salary minimum for teachers Instead, the court held the phrase "average school supplement" actually refers to "the mandatory local portion of the EFA base salary" (which is of course *included* in the state minimum), rather than the discretionary supplements from individual school districts described above According to the court and Employers "[b]y specifying both state and average supplement pay scales the General Assembly was trying to explicitly require the DOC *48 and District to pay their teachers both portions of the EFA teacher pay schedule " This construction is simply untenable

It is presumed the legislature included the words "state" *and* "average school supplement" for a reason if "average school supplement" merely refers to the "local portion" of the EFA-mandated state minimum salary requirement, its use in § 24-25 70(7) would be superfluous. It is well settled, however that statutes "should be so construed that no word clause sentence, provision or part shall be rendered surplusage or superfluous." *Pike v South Carolina Dep t of Transp*, 332 S.C 605, 618, 506 S.E.2d 516, 523 (Ct.App.1998) (quoting *Matter of Decker*, 322 S C 215, 219, 471 S E.2d 462, 463 (1995)) Moreover given that construction the phrase as used in § 24-25-70(7) seemingly would require Employers to contribute "locally-generated" funds to Employees salaries a patent absurdity The District, as part of the Department of Corrections, clearly has no tax base from which to generate revenue and this Court will not render an interpretation which leads to such an illogical conclusion *See Ray Bell Constr Co., Inc. v School Dist of Greenville County*, 331 S C 19, 26, 501 S E 2d 725, 729 (1998) (stating that courts ordinarily will reject a proposed statutory **663 meaning "when to accept it would lead to a result so plainly absurd that it could not possibly have been intended by the Legislature or would defeat the plain legislative intention") (quoting *Kiriakides v. United Artists Communications, Inc.*, 312 S.C 271, 275, 440 S.E 2d 364, 366 (1994)) Finally use of the plural "scales" evidences an intention that teacher pay in the District should be based on two separate pay schedules, a "state" pay scale and an "average school supplement" pay scale *See Emerson Elec. Co v Wasson*, 287 S C 394, 397, 339 S.E.2d 118, 120 (1986) ("The legislature s use of the plural 'taxpayers' instead of taxpayer' indicates that corporations filing consolidated returns are not to be considered a single entity ").

[6][7][8] In construing a statute our primary goal is to ascertain and effectuate the intent of the Legislature *Jackson v. Charleston County Sch. Dist*, 316 S C. 177, 447 S.E.2d 859 (1994), *Gilstrap v S.C Budget and Control Board*, 310 S C 210, 423 S E 2d 101 (1992) Each provision therefore "should be given a reasonable construction[ ] consistent with the purpose and policy of the Act." *49*Jackson*, 316 S.C at 181, 447 S E.2d at 861,

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Gardner v Biggart, 308 S C. 331, 417 S E.2d 858 (1992) Legislative intent "should be ascertained primarily from the plain language of the statute." *Richland County Sch Dist. Two*, 335 S C at 496, 517 S E.2d at 447 (quoting *Stephen v Avins Constr Co*, 324 S C. 334, 339, 478 S E.2d 74, 77 (Ct.App 1996))

[9][10] Furthermore a primary rule of statutory interpretation is that "words must be given their plain and ordinary meaning without resort to a subtle or forced construction which limits or expands the statute's operation" *Adkins v Varn*, 312 S C 188, 191, 439 S E.2d 822, 824 (1993) *see Richland County Sch. Dist. Two*, 335 S.C at 496, 517 S E 2d at 447 Thus, when a statute contains "clear and unambiguous" terms, this Court "must apply those terms according to their literal meaning" *Adkins*, 312 S C at 191, 439 S.E 2d at 824, *see also Citizens for Lee County, Inc v Lee County*, 308 S C 23, 28, 416 S E 2d 641, 644 (1992) (In construing statutes the terms used therein must be taken in their ordinary and popular meaning ")

We agree with Employees that the plain language of teachers pay schedule based on the state and average school supplement pay scales" means that, in addition to the state mandatory minimum Employees are entitled to additional compensation equal to the mathematical average of all salary supplements paid by school districts across the state. Such a construction comports with statutory provisions guaranteeing teachers who are state employees but not employed by a particular school district a salary adjusted to reflect the salary schedules of the surrounding school districts *See* S C.Code Ann § 59 25 50 (1990) ("Each state agency shall receive such funds as are required to adjust the pay of all certified instructional personnel to the appropriate salary provided by the salary schedules of the surrounding school districts "); S C.Code Ann § 8-11 271 (1986) ("The salary structure for [certified] employees at the South Carolina School for the Deaf and Blind shall be on the basis of comparable daily compensation with the school district with which the School for the Deaf and Blind competes for instructional personnel.") Presumably the Legislature intended the combination of the state minimum and average school supplement pay scales as a *50 similar guarantee so that Employees, like their colleagues at other state agencies, would be paid in a manner comparable to public school teachers in the "surrounding" (and in the case of District "statewide) school districts [FN5]

FN5 Employers also proffer several "considerations" which they claim support the decision to not pay Employees a salary supplement a number of school districts do not pay the optional local supplement the District does not have an independent tax base from which to draw financial support, the Legislature did not specifically appropriate funds to the District to pay for salary supplements the Department of Education has never cited the District during the course of numerous audits for failing to pay such supplements None of these rationales, however absolves Employers of their duty to pay Employees as section 24-25 70(7) directs *See, e.g Hatchett v Nationwide Mut. Ins Co*, 244 S C 425, 431-32, 137 S.E.2d 608, 611 (1964) ("The responsibility for the justice or wisdom of legislation rests with the Legislature and it is the province of the courts to construe not to make, the laws.") (quoting *Laird v Nationwide Ins Co*, 243 S.C. 388, 395, 134 S E.2d 206, 209 (1964))

**664 Because we find § 24-25-70(7) authorizes additional compensation to Employees based on an average of these local school supplements which Employers admit has not been paid, we reverse the grant of summary judgment and remand this issue to the trial court for a determination of appropriate back pay consistent with this opinion *See Johnson v. Spartanburg County Sch. Dist No 7*, 314 S C 340, 444 S E.2d 501 (1994) (affirming reinstatement of assistant principal and remanding to the trial court for a calculation of back pay and appropriate allowances)

IV Payment of Wages Act

Employees further contend that Employers "[w]ithholding [of] compensation for scheduled work days and deduction of 15 leave days per year violates the South Carolina Payment of Wages Act. We disagree

[11] "[T]he South Carolina Payment of Wages Act is remedial legislation designed to protect working people and assist them in collecting compensation *wrongfully withheld*" *Dumas v InfoSafe Corp.*, 320 S C 188, 194, 463 S E 2d 641, 645 (Ct.App 1995) (emphasis added) Because we have already determined Employers' 235-day pay schedule for Employees *51 is appropriate, the trial court properly granted summary judgment on this issue

V "Total Compensation Package"

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[12] Finally Employees argue the trial court erred in concluding, as an alternative basis for summary judgment, that their "total compensation package" exceeded any amounts to which they allegedly were entitled thereby "further illuminat[ing] the equities of [the] case" and convincing the court that Employees compensation "has been dealt with legally equitably and in good faith" by Employers

In its amended order the trial court found that "the value of the benefits currently being provided to [Employees] more than compensates them for the difference [in pay] they claim entitlement to " The court went on to note that such benefits as annual leave paid holidays, sick leave salaries tied to certain "cell levels or levels of experience and the mandatory Southeastern schoolteacher average and participation in the Police Officers Retirement System indicate Employees have "ended up with the best of both worlds in terms of benefits Therefore, the court reasoned, Employees "cannot complain that they have been unfairly compensated" by Employers

We agree with Employees that these benefits do not relieve Employers of their obligation to pay Employees according to law and clearly are irrelevant to any determination of Employees' entitlement to compensation particulars provided for by statute Moreover nothing in the overall legislative scheme governing teacher pay in the District permits such a set-off against Employees salaries Accordingly summary judgment on this issue is reversed.

For the foregoing reasons the grant of summary judgment to Employers is

AFFIRMED IN PART, REVERSED IN PART, and REMANDED

CURETON and GOOLSBY, JJ concur

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STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF RICHLAND	)	FOR THE FIFTH JUDICIAL CIRCUIT
James Cal Bell Othella Bernard, Katherina Bower, Linda M W Bratton Ann T Bridges Rance C Cobb, Jeannie B Croxton Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph Carolyn McIver Smith, Maggie G Williams and Paula Woodlief,	)	Civil Action No 04-CP-40-1761
Plaintiffs/Petitioners	)	**MEMORANDUM IN OPPOSITION TO THE PETITIONERS' PETITION FOR JUDICIAL REVIEW**
-vs-	)	
South Carolina Department Corrections and Palmetto Unified School District No 1,	)	
Defendants/Respondents	)	

APPENDIX B

Westlaw

SC ST § 24-25-10

Page 1

Code 1976 § 24 25 10

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections Jails Probations Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1

→§ 24 25-10 Palmetto Unified School District No 1 established.

There is hereby established a special statewide unified school district within the South Carolina Department of Corrections to be known as the "Palmetto Unified School District No 1

HISTORY 1981 Act No 168 § 1

CROSS REFERENCES

School districts generally see §§ 59 17 10 et seq

LIBRARY REFERENCES

Schools ⇐23
Westlaw Topic No 345
C.J S Schools and School Districts §§ 18 29 32 63 to 68

Code 1976 § 24-25 10 SC ST § 24 25 10

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SC ST § 24-25 20 Page 1

Code 1976 § 24-25 20

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails Probations, Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1

→§ 24-25-20 Purpose.

The purpose of the district is to enhance the quality and scope of education for inmates within the Department of Corrections so that they will be better motivated and better equipped to restore themselves in the community The establishment of this district shall ensure that education programs are available to all inmates with less than a high school diploma, or its equivalent, and that various vocational training programs are made available to selected inmates with the necessary aptitude and desire Where enrollment in an education program must be restricted, justification for that restriction should be documented by the district.

HISTORY 1981 Act No 168 § 2

LIBRARY REFERENCES

Schools ⇐23
Westlaw Topic No 345
C J S Schools and School Districts §§ 18 29 32 63 to 68

Code 1976 § 24 25 20 SC ST § 24 25-20

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SC ST § 24 25 30 Page 1

Code 1976 § 24-25-30

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails Probations Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1

→§ 24-25-30 District schools to meet state standards, state Superintendent of Education to administer standards reports, evaluations.

Academic and vocational training provided by the Palmetto Unified School District No 1 shall meet standards prescribed by the State Board of Education, for the academic and vocational programs of these schools The State Superintendent of Education shall administer the standards relating to the educational programs of the district Reports shall be made by the State Department of Education to the Board of Trustees indicating the degree of compliance with the standards prescribed by the State Board of Education at least annually Such State Department of Education supervisory personnel as deemed appropriate by the Department shall be utilized for evaluating the programs of the district and reporting to the district board

HISTORY 1981 Act No 168 § 3

CROSS REFERENCES

General duties of State Superintendent of Education see § 59 3-30

LIBRARY REFERENCES

Schools ⇐23
Westlaw Topic No 345
C J S Schools and School Districts §§ 18 29 32 63 to 68

Code 1976 § 24-25 30 SC ST § 24-25 30

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SC ST § 24 25 35 Page 1

Code 1976 § 24-25-35

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails Probations, Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1

§ 24-25-35 Funds for certain educational programs.

The Palmetto Unified School District 1 of the South Carolina Department of Corrections shall submit appropriate student membership information to the State Department of Education and the South Carolina Department of Education s appropriation request under the line item "Education Finance Act" shall include sufficient funds for the Palmetto Unified School District 1 The amount to be requested for the Palmetto Unified School District 1 shall be sufficient to produce funds equal to the product of the number of students served by the school district weighted according to the criteria established by the South Carolina Department of Education under the provisions of the South Carolina Education Act of 1977 and the state portion of the appropriated value statewide of the base student costs adjusted for twelve months operation The Palmetto Unified School District No 1 shall comply with the following provisions of subsection (4) of Section 59 20-50 subsections (1) (2) (3)(a), (4)(b) (c) (d), (e) and (f) of Section 59-20-60 The South Carolina Department of Education annually shall determine that these provisions are being met and include its findings in the report mandated in subsection (5)(e) of Section 59-20-60 If the accreditation standards set forth in the Defined Minimum Program for the Palmetto Unified School District No 1 as approved by the State Board of Education are not met, funds by this section shall be reduced the following fiscal year according to the provisions set forth in the Education Finance Act.

HISTORY 1994 Act No 497 Part II § 15B

Code 1976 § 24-25-35 SC ST § 24-25-35

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SC ST § 24 25-40 Page 1

Code 1976 § 24-25-40

C

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections Jails Probations, Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1

→§ 24-25-40 Trustees of school district; appointment, terms, vacancies.

The Palmetto Unified School District No 1 shall be under the control and management of a board of nine trustees who shall operate the district under the supervision of the State Department of Corrections Four members of the school board shall be appointed by the Director of the Department of Corrections four members of the school board shall be appointed by the State Superintendent of Education, and one member of the school board shall be appointed by the Governor The members of the board shall be appointed for terms of four years each and until their successors are appointed and qualify except that of those first appointed, the members appointed by the Director of the Department of Corrections and the members appointed by the State Superintendent of Education shall be appointed for terms of one two three and four years respectively such terms to be designated by the Director of the Department of Corrections and the State Superintendent of Education when making such appointments The member initially appointed by the Governor also shall be appointed for a term of four years Vacancies on the board shall be filled for the remainder of the unexpired term by appointment in the same manner as provided for the original appointment.

HISTORY 1981 Act No 168 § 4 1993 Act No 181 § 483

CROSS REFERENCES

Boards of school districts see §§ 59 19-10 et seq

LIBRARY REFERENCES

Schools ⇐51
Westlaw Topic No 345
C J S Schools and School Districts §§ 15 77 to 79 110 to 112 114 to 140 142 to 166 205 254 356 401

Code 1976 § 24 25-40 SC ST § 24-25-40

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SC ST § 24 25 50 Page 1

Code 1976 § 24 25-50

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails Probations Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1

→§ 24-25-50 Removal of school board members

The members of the school board may be removed at any time for good cause by the Director of the Department of Corrections The failure of any member of the school board to attend at least three consecutive meetings thereof unless excused by formal vote of the school board, may be construed by the Director of the Department of Corrections as a resignation from the school board.

HISTORY 1981 Act No 168 § 5 1993 Act No 181 § 484

CROSS REFERENCES

Removal of school district trustees generally, see § 59-19 60

LIBRARY REFERENCES

Schools ⇐51
Westlaw Topic No 345
C.J S Schools and School Districts §§ 15 77 to 79 110 to 112, 114 to 140 142 to 166 205 254 356 401

Code 1976 § 24-25-50 SC ST § 24-25 50

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SC ST § 24-25 60 Page 1

Code 1976 § 24-25-60

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections Jails Probations Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1

§ 24-25-60 Board to elect officers terms, meetings, compensation.

The school board at its first meeting, and every two years thereafter shall elect a chairman a vice-chairman and such other officers as it deems necessary who shall serve for two years each and until their successors are elected and qualify No person may succeed himself as chairman of the board The school board shall meet at least quarterly and at such other times as may be designated by the chairman Special meetings may be called by the chairman or by a majority of the members of the board upon at least seventy-two hours notice Five members of the board shall constitute a quorum at all meetings thereof The members of the board shall be paid per diem, mileage and subsistence as provided by law for members of boards commissions and committees

HISTORY 1981 Act No 168, § 6

CROSS REFERENCES

Organization of school district boards of trustees generally see § 59 19-70

LIBRARY REFERENCES

Schools ⇐63
Westlaw Topic No 345
C J S Schools and School Districts §§ 110 112, 114 116 129 141 to 142 168 to 191 194 to 195 218 244 248 253 259 264 to 265 321 341 to 342 346 725

Code 1976 § 24 25-60 SC ST § 24 25-60

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SC ST § 24-25 70 Page 1

Code 1976 § 24-25-70

C
Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails Probations Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1

→§ 24-25-70 Powers and duties of school board.

With the consent and concurrence of the Director of the Department of Corrections, the board of the school district shall operate as executory agent for the schools under its jurisdiction and shall perform administrative functions as follows

(1) establish goals and objectives for the operation of the district

(2) enter into agreements and contracts with other school districts technical schools colleges and universities

(3) establish academic education programs ranging from primary through post high school, as well as special education for the handicapped and mentally retarded

(4) establish vocational and trade courses as appropriate for preparation for employment

(5) determine physical facilities needed to carry out all education programs

(6) review and approve applications for grants donations, contracts and other agreements from public or private sources

(7) establish a twelve-month school program and teachers' pay schedule based on the state and average school supplement pay scales

(8) present an annual educational budget to the Department of Corrections for submission to the General Assembly The Department of Corrections when making its annual budget request shall incorporate as a line item the budget of the district within its request. To the extent permitted by law any funds which may be appropriated by the General Assembly for the operation of the district shall not prohibit the district from securing any applicable federal funds or other funds which are available

HISTORY 1981 Act No 168 § 7 1993 Act No 181 § 485

CROSS REFERENCES

General powers and duties of school trustees, see § 59-19-90

LIBRARY REFERENCES

Schools ⇨55
Westlaw Topic No 345
C J S Schools and School Districts §§ 15 110 to 111, 142 to 144, 147 205, 254 356 401

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SC ST § 24 25 70

Code 1976 § 24 25 70

NOTES OF DECISIONS

In general 1
Teacher compensation 2

1 In general

Statutory provisions governing compensation, salary adjustments and annual leave did not create employment contract between corrections school district teachers, school district, and Department of Corrections (DOC), as statutes did not evidence any intent by General Assembly to create contractual rights Abraham v Palmetto Unified School Dist No 1 (S C.App 2000) 343 S C 36 538 S E.2d 656 rehearing denied Prisons ⇦ 8

2 Teacher compensation

Statute that directed school board to establish pay scales for teachers in twelve-month corrections system school program required board to pay teachers salary supplement, in addition to state-wide minimum salary based on state wide supplement average, as interpreting term "average school supplement" to mean that board was only require to pay state minimum salary would be untenable and use of plural term "scales evinced intention to pay teachers based on two schedules state pay scale and average school supplement scale Abraham v Palmetto Unified School Dist. No 1 (S C.App 2000) 343 S C 36 538 S E 2d 656 rehearing denied. Prisons ⇦ 8

Fact that benefits received by teachers in corrections department school district exceeded those received by teachers in public school districts did not relieve Department of Corrections and school district from obligation to pay teachers according to law as nothing in overall legislative scheme governing pay permitted extra benefits to be set-off against teachers salaries. Abraham v Palmetto Unified School Dist No 1 (S C.App 2000) 343 S C 36 538 S.E.2d 656 rehearing denied. Prisons ⇦ 8

Teachers who worked in corrections school district on twelve-month schedule were compensated at same rate as public school teachers despite teachers claims that they were not compensated for holidays and vacation time as year round teachers worked 235 days as compared to 190-day work year for public school teachers, and corrections school district teachers were paid 124 percent of public school teachers salaries. Abraham v Palmetto Unified School Dist. No 1 (S C.App 2000) 343 S C 36 538 S.E 2d 656 rehearing denied. Prisons ⇦ 8

Code 1976 § 24-25-70 SC ST § 24 25 70

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SC ST § 24-25-80 Page 1

Code 1976 § 24-25-80

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections Jails Probations Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1

§ 24-25-80 Duties of district Superintendent of Education

The duties of the district Superintendent of Education shall include the following

(1) Identify goals and objectives for all educational services of the district

(2) Develop policies and procedures for efficient delivery system of such services

(3) Collect and analyze data necessary for research into planning and evaluation of educational services

(4) Provide necessary information for preparation of an annual report of the district's operation

(5) Prepare a separate budget of all necessary costs to be provided to the inmate by the unified school district;

(6) Recommend to the school board plans for the renovations and designation of educational facilities

(7) Provide all such studies research and evaluation of the district's operation as the board may request and perform such other duties as it may request.

HISTORY 1981 Act No 168 § 8

CROSS REFERENCES

General duties of county and district superintendents see § 59 13-60

LIBRARY REFERENCES

Schools ⇐63
Westlaw Topic No 345
C J S Schools and School Districts §§ 110 112 114 116 129 141 to 142, 168 to 191 194 to 195 218 244 248 253 259 264 to 265 321 341 to 342, 346 725

Code 1976 § 24-25-80 SC ST § 24-25-80

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SC ST § 24 25 90 Page 1

Code 1976 § 24 25 90

C
Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections Jails, Probations, Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1

→§ 24-25-90 Superintendent and other personnel to be employed according to Department of Correction policies

The superintendent of the district and all other educational personnel shall be employed, supervised, and terminated according to the South Carolina Department of Corrections' personnel policies and procedures.

HISTORY 1981 Act No 168 § 9

LIBRARY REFERENCES

Schools ⇐63
Westlaw Topic No 345
C.J S Schools and School Districts §§ 110 112 114 116 129 141 to 142 168 to 191 194 to 195 218 244 248 253 259 264 to 265 321 341 to 342 346 725

Code 1976 § 24-25-90 SC ST § 24 25-90

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STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF RICHLAND	)	FOR THE FIFTH JUDICIAL CIRCUIT
James 'Cal" Bell, Othella Bernard Katherina Bower Linda M W Bratton Ann T Bridges Rance C Cobb Jeannie B Croxton, Bernetha L Culbreath, William K. Dreyer Jacqueline D Farr Ruth Fritts, Nancy Glenn Etta Jane Jones, Geneva M Martin Mary H McCabe, Beverly McClanahan, Max D Randolph Carolyn McIver Smith, Maggie G Williams and Paula Woodlief	)	Civil Action No 04-CP-40-1761
Plaintiffs/Petitioners	)	**MEMORANDUM IN OPPOSITION TO THE PETITIONERS' PETITION FOR JUDICIAL REVIEW**
-vs-	)	
South Carolina Department Corrections and Palmetto Unified School District No 1	)	
Defendants/Respondents	)	

APPENDIX C

SCDC
0260

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office were you, Mr Sharpe - was Ms Jackson still in charge of academic?
A. Ms Jackson was there
Q And a person prior to Ms Venning, Ms Banks you said?
A Dr Banks Bob Banks But I'm pretty sure he left before the reduction, and his position was frozen so we did not replace him.
Q Okay
A And I'm trying to place where, I'm trying to remember exactly when Murtlyle Marshall left.
Q And what position was that?
A. She I'm pretty sure she had already left and Susan Mullis had assumed some of those duties
Q Okay And what was the person who left
A Murtlyle Marshall
Q Yeah What was Ms Marshall's position?
A Well she was coordinating, before she left she was coordinating personnel matters She was a former principal with us And my recollection is that she had already left and that we had redistributed her duties
Q Okay And there was no Title 1 person at that time?
A No Title 1 person. Ms Jackson was trying to

Page 18

do it all yes
Q Okay And what about a school psychologist?
A We did have a school psychologist, however, at that point in time my recollection is our school psychologist was housed in Turbeville There was a period of time that he worked out of an institution. That was partly, it was the largest institution, and his name was - I can't even think of his name. And I'm not sure of his status, but, here again, school psychologist has to have a very specific credential
Q Correct.
A And so, they're hard to hire and find And I think we - he was employed under a previous Superintendent, but he did extend into my tenure as Superintendent, and he worked out of Turbeville So it s kind of hard to consider him a part of the District office
Q Right. But he worked after the RIF? I mean, he was, he maintained?
A I cannot - no My recollection, no I remember I'm pretty sure that our current school psychologist was on board because I remember I had to defend that position, and

Page 19

it's absolutely required for special ed that we have it. And at one point in time you know folk wanted to cut, they didn't understand why we needed that, and I had to defend it very strongly And I think that our current school psychologist had been employed at point in time but I'm not 100 percent sure
Q And who is that?
A Her name is Dr Tommie Wicker
Q Okay Let's go back to your title Do you have a position description?
A (Nods head affirmatively)
Q Could I have a copy of that, please?
A I'm sure it's in the file somewhere.
Q Okay
A Yes
Q Not my file.
A It's in our file somewhere
Q Okay Yes sir I'd like to have a position description Now, on that
A Is someone keeping notes as to ..
MR. JUSTICE They'll make a production request for all that
A. Good. All right.
Q In that you've indicated you basically are

Page 20

known under two titles Division Director of Education and Superintendent of Education, are you considered part of the Department of Corrections Administration or are you a certified person in the Palmetto Unified School District?
A. I'm both.
Q Okay
A. And I guess that's why two titles come about. Most divisions are called Division Directors, and so when they send out messages to all Division Directors I generally am on that receiving end. At the same time, our school district is in place and so ..
Q And let's talk about that school district. How many districts do you supervise?
A. How many districts?
Q Yes, sir
A. One
Q One?
A. Palmetto Unified School District.
Q And what does that encompass?
A It encompasses education in the Department of Corrections
Q Where?

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A However unlike most Superintendents who report only to the Board, I also have a supervisor within our agency, so I report to Gerri Miro or the Director of the Division of Programs and Services So you know I do not just our school district is unique I'm sure you've read the law that created it.
Q Yes sir
A And so I report to the Board, but I also report to the agency
Q Okay And you have a division supervisor and who is that?
A That's Gerri Miro currently Now at the point of I guess at the point of the reduction in force I think it was - it was Judy Anderson at the point of reduction in force. And she's currently a warden now still with our facility
Q Tell me Judy's last name again?
A. Anderson.
Q Okay So it encompasses all of South Carolina?
A. All of corrections but not Juvenile Justice They have a separate district.
Q Okay
A. So we pick them up at age 21

Page 22

Q Okay
A. And, of course, our primary focus then is, as far as the school district is concerned, is the high school age eligibles, those that are eligible for funding under the Educational Finance Act.
Q Okay So EFA
A EFA, we receive those funds and that's the primary focus of the school district. But over the years of course our adult ed and services to adults has been the larger in terms of volume, in terms of number of students, but probably not in scope of services and not necessarily even in dollars spent, but because we've had extra funding to provide a full and comprehensive program, whereas we might, so we would serve all of those students, you know at least 15 hours a week, whereas some of our adult ed students might be served only four hours a week.
Q All right. Now the school district encompasses all of the Department of Corrections, exclusive of DJJ because it's its own entity within the state?
A Well, yes And, of course, I mean, as I say,

Page 23

there is a division between the nine high school programs and the adult ed, other programs
Q Right.
A And so we do
Q But not geographically?
A Not geographically and I mean you know there is a difference in scope of programs, in terms of available resources in terms of those kinds of things And so, you know the question has always been, you know well, is the school district just those high school programs or to what extent can the school district, you know include the adult ed components
Q Okay But those programs are at the same places at the same time? You can have high school programs ..
A. You can have them ..
Q .. and adult ed programs in the same facilities?
A. At nine places but then there are 28 prisons So at the other places, then the educational programming is much more limited in scope and resources, yes

Page 24

Q Okay Are there any geographical regions that are segregated and not under your purview?
A No. I have more limited responsibility for programs that are offered by the adult ed local communities That essay is provided through contractual services and so you know I do not have the authority over those programs that I would over the programs funded through our agency or through federal funds received by our agency So I have direct supervisory responsibility through subordinates for all programs that are funded through our district.
Q Right.
A. But programs that are funded through the county local adult ed programs, I have coordinating responsibility
Q Okay So for just facilitating those agreements?
A. That's correct.
Q Okay You talk about your responsibility to report to the Palmetto Unified School District Board as well as your division supervisor How many times a year does the Board meet?
A. Four times a year by law Each quarter Once each quarter

Page 25

Q Okay And who's on that Board?
A The Board is appointed, all of the members of our Board are appointed. Four of them are appointed by the Director of the agency by the Commissioner and then the official title became Director of the Department of Corrections
Q And that's Ozmint?
A That s Ozmint.
Q Okay
A And his predecessors Of course, they're appointed for four years
Q Right.
A Four of the Board members are appointed by the State Department of Education, by Inez Tenenbaum or her predecessors and then one of the Board members is appointed by the Governor
Q Okay So there are nine Board members?
A We do have nine members. There have been times that we've had vacancies but right now we do have nine Board members, all positions are filled
Q Okay Did you have nine Board members back in 2003?
A I could not totally recall that. There were at least eight We did have a fairly extensive

Page 26

vacancy with the Governor's appointee shift, just getting through the bureaucracy and we had a person move out of state, never submitted a letter of resignation. There was a period but - so there have been some times when that position has been vacant for extended periods of time
Q Okay Tell me what your role is with the Board?
A. Of course, I'm at every Board meeting. You know we discuss programs We discuss directions inform the Board of what is occurring They - of course, we have an agenda, as you can see through the Minutes
Q Right. And I'll ask about those in a minute
A. And, as you see, as you read the Minutes, you see that I am, you know, I field questions about our operations, and they occasionally give me an assignment for information. So they are - you know, I do play a very active role with them.
Q Now what does the Board do?
A Okay The Board was created by the legislation
Q Right.

Page 27

A. And the Board originally the scope of power of the Board has been an area where over - see I've been there ever since I've just about attended every Board meeting since '81 I mean 84 The Board was created and kind of constituted in that period, 83/'84 about the time I came to Headquarters, it was being constituted. So I've been to just about every Board meeting. And, you know, in some cases the Board has kind of searched for its role and how, and its authority But the Board is, originally was constituted, as written in the legislation, reported to the Board of Corrections, when we had a Board of Corrections Then when that law was revised that language was changed by the legislature, and they actually report to the Director of the division of the agency
Q Of the whole Department of Corrections?
A. The whole agency So you know I mean he can terminate them, you know so you know I - the Board, as I say, has more limited power certainly, than a regular school board. A regular school board has you know the ultimate authority They are elected

Page 28

officials. But in this case, they are appointed officials and they are they work at the pleasure of the Director of our agency And so they advise the agency and look at our programs and advise on directions and policies and they look at ...
Q Do they make any policies? Do they make any changes to policies within the District?
A They have developed a policy manual you know for the Board operation So, primarily their concern in terms of policy has been the Board operations However change in policy would, from time to time, be discussed with them, and their advice would be sought.
Q Explain what you mean, "their advice would be sought"?
A. Just what it says you know They would give their ideas about it, but the final approval of SCDC policy lies with the Director
Q Including any internal educational policies?
A. Including education policies, yes.
Q Let's talk about their policy manual. I, just so I'll clarify, I work a lot with school districts, and so I deal with the regular Superintendents and the school boards, and

Page 29

there is a model school board policy manual
Did the Board utilize
A When the policy manual was originally developed the School Board Association gave assistance in that process Of course, everybody struggled with our uniqueness That policy manual quite frankly is very much out of date However so is our defined minimum program Originally, when we became a school district, we had a defined minimum program, and as you are aware, the State did away with the defined minimum programs And our defined minimum program was, however, grandfathered to stay as were several other special school districts And it is, obviously, you know needs to be updated However, every time we have sought to have it updated the State Department has not really wanted to deal with it and has not really wanted to work through that process So until it's updated, it's very difficult to keep the policy manual updated.
Q Okay
A. But, I mean, you know, it covers things regarding, you know, openness of the communication, you know, the role of the Board

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in terms of you know they can't act as individuals they have to act as a body you know those kinds of rules of order which are still based in law
Q Do they have any like in the regular school districts do they have any policies that deal with - this is interesting - safe schools or blood-borne pathogen policies like normal school districts have?
A In some extent, they do
Q Okay
A But, here again the School Board policy manual probably has not been kept up to date as it could have been, and it's not a topic of frequent discussion in our Board meetings Now at one point in time, early in the District, we probably gave a lot more attention to that but, you know, the School Board policy for things like you know personnel matters, it says in that policy as the law says that our personnel are hired as State employees through the Department of Corrections which is stated in the law So that means the School Board generally does not get that involved in personnel issues because by law, all of us,

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including me, as a State Department of Education, I mean, State Department of Corrections employee and a State employee not hired as a contract as other Superintendents would be by the Board.
Q Right. Okay Does the Board have any budget-creating responsibility?
A At each meeting, we provide the budget report, as you see it there. The budgets are discussed, where do we stand with budgets, you know expenditures for the year are on track and that kind of thing. So a report is given at every Board meeting regarding budgets Here again, SCDC budgets are you know most of our money, traditionally has come through the agency itself. Then a portion of our money is generated through the School District concept, through EFA and EIA and federal funds.
Q All right. So you do receive EFA, EIA and federal funds as ..
A. And federal fund Title 1
Q Okay
A. Yeah And, you know for instance, when we were - our adult ed funds were being cut. And the Board wrote a letter to Inez Tenenbaum

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expressing concern, asking that we have a meeting with our Board Chairman and myself. And that was done by the Board, an action taken by the Board to support the District that involved budgets.
MS GUFFEY Okay Just a point of reference for the record, Mr Blanton was referring to one of two sets of Minutes provided this morning from the Palmetto School District's Board meetings specifically referencing April 17th 2003 the third quarter meeting, Palmetto Unified School District budget attached to the Minutes of the Board
Q Okay Let me ask a couple of things before I get back into that. So that I understand, the Board can advise and ask for assistance, but as to budget, it just reviews what is prepared?
A That's - if it so chose to do more, it could do more. I mean, it might, you know - but, ultimately here again, if you look at the law they do report to the head of our agency And so they do have a much more limited role in terms of budgets than a local district that entirely controls the budget by their vote and their act Our district could not vote and

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control the budget for the money that comes from the Department of - through the Division of Education And it was that money that was being cut in the reduction in force. So you know they probably have more input and authority when it comes to the other funding. But, here again, that Board reports to the Director of our agency

Q Okay Let me be clear because I'm confused. The RIF money that was being reduced was the money received through the State Department of Education?

A No through the State Department of Corrections I mean through the Department of Corrections

Q Okay

A It was the Department of Corrections State appropriated money through the Department of Corrections that was being reduced.

Q Not the money directly received from federal grants or EIA or EFA?

A That's correct.

Q Okay Do you have a finance person within the Palmetto Unified School District?

A. That is - the finance person that we have does

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not report to me, but reports to our Director of Finance So we have a person assigned to do our financial work; that person does not report to the Superintendent.

Q Okay Who is that person?

A. At the time of the reduction in force, it was Felicia Poston It is now - and I'm just drawing a blank on the name - Betsy Stewart.

Q Okay Now, she is responsible for Palmetto Unified School District finances and reports to the Director of Finance?

A. She reports to Bruce Burnett, who is the head of Financial Accounting, who reports to Glen Franz, who is our overall agency Deputy Director for Administration, budgets and such

Q Okay Looking at the budget, and I'm sorry I don't have more copies for us but just if you would look at that. Are these the type records that Ms. Stewart would maintain?

A. That's correct.

Q And how long are finance records maintained?

A Whatever the requirement of the State agency and of, you know, for instance, federal funds I think they have to be maintained for five years So, you know, you would really need to

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direct that to our finance area but, you know I don't - you know I know they're maintained according to the law and the requirements.

Q Okay Well let me ask you this. This is for a third quarter Are there other quarters the other three quarters

A. This report is given to the Board every meeting. So every time we hold a meeting, they get a report similar to this one.

Q Okay And they are maintained within your finance person's office the one specifically for Palmetto Unified School District?

A This particular report came from the School Board Minutes file, so it is a part of every Minute that we have met, as far as I can remember that we have a report similar to this one

Q Okay So there are reports Okay As part of your responsibilities Mr Blanton do you post vacancies for the Palmetto Unified School District?

A No

Q Who does that?

A We send paperwork, as any other division, to Human Resources, and the actual posting of

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vacancy and it has to be approved Any announcement of any vacancy would have to be approved through various channels and then it is posted through our agency system, as with all other positions

Q And I'm just relating back to my experience in State government, you generate or decide what kind of position you need, and then what happens?

A. As I say there's something called a Personnel Advice Form. We generally would have a job description for that position. We would identify its funding source on that Personnel Advice Form, and we would, I would submit it to my, at this point in time - and that procedure has changed over time - I would submit it to my supervisor who would have to approve it, a Deputy Director person, whether it was Judy Anderson or now Gerri Miro In some cases, if it's a new position it has to be approved by the Director but if I'm refilling a current vacancy currently my supervisor can approve that and then it is sent to Human Resources Now you know, in terms of what procedures they go through before it's - sometimes we, you

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know we get told we can't post it, you know That s not - that doesn't occur unless there's a hiring freeze or - right now we're generally able to post positions. But there was a long hiring freeze where you know we were told that no positions would be posted that was true for the Division of Education and all other divisions I mean we even had wardens deputy wardens the agency was not posting any positions unless it was considered emergency and you had to write a justification to get it posted.

Q When you have a vacancy that is being filled, do you generate the Notice of Hire or does

A. No We interview We cannot even tell the applicant that they are the person selected, that can only come from Human Resources. So we interview turn in our paperwork, our documentation, our rating, and then we turn that over to Human Resources They make sure that everything is in order, and then they begin to negotiate with the person. And, of course there are requirements like, you know background checks as far as you know they haven't been convicted of a crime, you know, a

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drug test, and so only they can actually offer the position

Q Okay Do you know if they notify the other applicants that the position has been filled?

A. I don't - I think they should, but I don't know

Q Okay And those records would be maintained in the Human Resources -

A That's correct.

Q And that, when you're talking Human Resources, you're talking about the division within the Department of Corrections headed by John Near?

A That s correct.

Q Okay You mentioned earlier, Mr Blanton, that prior to the reduction in force you had approximately 200 or so certified employees under your

A No, I'm not sure that would - not all of those would have been certified.

Q Okay How many of those would have been certified?

A And I'm, this is my best recollection

Q I'm just ballparking. Yes sir

A and ballparking. I think somewhere around 160, 170, somewhere in that territory

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Q Okay

A 180 even, maybe. So that s how big a ballpark because you know you're thinking about a good many years back.

Q Okay Prior to the June 1st RIF how many education facilities did you have running?

A And, here again, you ll have to define "education facilities" Does that mean one staff person, one part-time staff person, one adult ed program from the community? We had some type of educational services in most of the institutions

Q Okay And how many institutions are there? You said that number earlier

A. We had about, I think we had about 19 to 21 somewhere in that range what I call what I would refer to where we had maybe at least one full-time person

Q Okay

A. So I would, when we sent out a letter to all institutional schools, we would send it out to about 19 to 21 somewhere in that ballpark.

Q Okay And program-wise, what was in effect prior to June 1st, those things that we talked about previously?

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A. Well, and here again level of services vary greatly from institution to institution. They did at that time and they still do

Q Okay

A. You know we again, at some of those places we would have because of the nature of the institution, its institutional mission, we would have maybe one teacher or we might have five teachers. At some of the adult, you know we had fairly large programs because we had large student bodies. At other institutions they are farm oriented and everybody works during the day They're not allowed to go to school during the day We have smaller staffing at some places like work release centers, very small staffing because, again, they go out in the community and work; they pick up trash along the side of the road. So we limited our programming to night school part-time programs

Q Okay Was there, prior to June 1st 2003 a salary schedule for certified employees?

A. Since the beginning of the school district, there has been a salary schedule for certified employees, yes

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funding, federal funding? And if you cut our budget our state budget, you jeopardize our other funding, and you need an educator to advise you of how you know, how this could be done and we could still keep the school district intact." So it was my hope and I believe I did that, that I saved many jobs by asking to be involved. And Judy Anderson facilitated that and got the Director you know attuned to involving me, and I did become involved at that late date.

Q Now Judy Anderson is your immediate supervisor?

A Exactly

Q Or was at the time?

A At that time.

Q Okay And when did you say you got wind of the RIF?

A Well I mean you know we all read the newspapers. The whole agency was concerned about our budget shortfalls, and so I can't say when that actually started, but I think we began to hear that there was something coming and that it was coming, you know in early April, and I didn't know any of the specifics

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except I was hearing that the Division of Education would be heavily involved, and perhaps we would lose all of our staff. And so, at that point in time, I felt it was judicial to get involved and try to save as much as I could.

Q And what I'm hearing from you is that no one came to you, you went to your supervisor?

A Well, I'm not saying she didn't come to me She and I discussed - she was very supportive and wanted to be very helpful, and she was concerned. And so you know we had discussions about my not being involved, and I expressed to her that I felt like somebody from our division that knew the District operation needed to be involved. And she communicated that up and it resulted in my getting an involvement at the very end.

Q And who did you relay your advice to?

A I relayed it to the Director to the Chief of Staff at that point in time Richard Stroker of course, then ultimately, after meeting with them briefly very briefly as I recall, I'm saying, you know ten or 15 minutes, and I expressed my concern of what was going on and,

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you know they did share with me that a reduction in force was coming and it would heavily involve education. And so I expressed my concern that if they cut this school district the wrong way we would lose it all and that, you know, I wanted to preserve as much as possible. And at that point in time, I was scheduled to meet with John Near Glen Franz, and Richard Stroker was in and out of the room frequently The Director did not participate directly in those sessions

Q But he did participate in the 10- to 15-minute discussion

A. With me about, yeah my concern that they not cut the whole District and that they not cut it in a way that, you know would cause us to lose the federal money That just seemed to be a no-brainer to me. Why would you want to lose the money? And we had to focus our services toward that population that generated the money and that was those under 21

Q Did they seem aware that they were jeopardizing federal funds?

A. I think - I mean, I'm not sure that they were totally unaware of it I cannot say that they

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were unaware of it, but I don't know specifically their level of awareness

Q And who was in that meeting with you and Ozmint, that short meeting?

A. Richard Stroker As I recall, he was present.

Q Okay Would there have been any memorandum of that meeting?

A. (Shakes head negatively)

Q You'll have to answer

A. No there was no memorandum that I know of That I recall.

Q Okay And then subsequently you tell me you met with Near and who else?

A. Glen Franz, Director of Budgets.

Q And Stroker was in there, in and out?

A. Periodically

Q And what was the topic of conversation? What was the discussion with Mr Near?

A. It was basically that positions were going to be cut. I think there was a dollar figure that we are you know, a level that was involved. You know, they had to make a certain number of cut a certain number of dollars from the current budget. And so at that point in time you know, we did discuss how the position cut

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could be made and us still maintain a school district.
Q. At that time did you discuss the teacher pay schedule?
A. I do not recall it being discussed because the lawsuit had already been settled and it was a given that we had to pay staff at the level So there was no discussion of, you know eliminating certified teachers from that and no discussion that we would you know that was a given.
Q. Was there any discussion of the certified personnel that would be the greatest cuts for meeting your dollar amount?
A. Well once we determined that we would try to move in terms of salvaging our funding and meeting the requirements - you see, I have to have certified staff to hold, to teach the school. I have to have special education teachers when there are special education students present So you know I have to have coverage for principals and coverage for librarians coverage for the guidance function. So once we determined that we would try to salvage the funding, we had to salvage those

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required positions And so then we looked - and so then, obviously the place that was to be cut was the adult education institutions and positions And then there was also express need to - and this had been an issue that I had kind of dealt with for many years There was a hope that we would have less EFA schools Some of our EFA schools are very small, only ten to 12 students and then most of the students were adult ed. So the agency as a part of what we did, did consolidate into nine schools rather than having, I think we had 13 previous to that, with some of those schools being very small in terms of the EFA numbers
Q. During these discussions did you have any input in the competitive areas that were drawn?
A. I did not. I was informed of the competitive areas along with the staff being cut. I received a copy of the memo
Q. Were there any other issues that you discussed with Mr Near in the RIF?
A. Well, the only - and this may be a little of an exception of what I just said. Now, as part of that, those series of meetings there was no discussion of the competitive areas Perhaps

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there were some phone calls later on And those phone calls, generally I had no input in the competitive areas but they generally involved credentials to hold a position. In other words a math teacher has got to bump a math teacher A, you know, a guidance counselor bumps guidance counselors and so forth. So then I did have some input into certification areas but not in, not any other input in terms of how the areas were drawn or who would bump who except in that area of credentialing.
Q. Did you provide information to Mr Near or his staff regarding which facilities had a greater number of advanced degrees and years experience certified employees?
A. Mr Near had that He had everybody's salaries, so he had that information. He would not have had to get it from me But he did not have actual credentials but he did have their salary
Q. Salaries?
A. And, of course the salary then corresponds to a salary chart that's published throughout our agency

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Q. Right.
A. Or throughout to those who need to know Human Resources, Financial Accounting, so each year as we place people on the salary chart at the appropriate level, obviously that salary chart is available to all our offices that deal with salary issues
Q. And the higher the salary the higher the years experience?
A. Well the higher years of experience the higher the salary
Q. Experience, the higher the salary yeah.
A. And the higher the credential, Master's, Master's plus 30 doctorate, and so forth.
Q. Okay Was the District office in any geographical area?
A. It was in the Midlands Broad River Complex area, and as I indicated before, we did have bumping within our office.
Q. That was Ms Vining who bumped from
A. Venning.
Q. Venning, excuse me.
A. Yes, she bumped.
MR. JUSTICE Excuse me, Dona.
(Off the Record)

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF RICHLAND	)	FOR THE FIFTH JUDICIAL CIRCUIT
James 'Cal" Bell, Othella Bernard, Katherina Bower, Linda M W Bratton, Ann T Bridges Rance C Cobb Jeannie B Croxton, Bernetha L Culbreath, William K. Dreyer Jacqueline D Farr Ruth Fritts, Nancy Glenn Etta Jane Jones, Geneva M Martin Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith Maggie G Williams and Paula Woodlief	)	Civil Action No 04-CP-40-1761
Plaintiffs/Petitioners,	)	**MEMORANDUM IN OPPOSITION TO THE PETITIONERS' PETITION FOR JUDICIAL REVIEW**
-vs-	)	
South Carolina Department Corrections and Palmetto Unified School District No 1	)	
Defendants/Respondents	)	

APPENDIX D

CREEL COURT REPORTING INC

JON E. OZMINT (6/21/2006)

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range from 313 to 349 But yes, they've all been over three hundred million.
Q Tell me what the sources of funds for the Department of Corrections are.
A Well our main source of funds is direct appropriations from the legislature and those legislatively appropriated funds come basically in three forms annual appropriations annual recurring appropriations annual one time appropriations and capital reserve fund monies We also have some carry-over bond funds that we have been living on for a number of years Those are funds that were originally slated for large larger construction projects that have now been converted to use for either smaller projects or just routine maintenance We draw some federal dollars from a variety of sources A very small percentage of our budget in comparison to most state agencies would be federal dollars Some of those the only consistent source of federal funds that we do draw are EFA, the educational related funds Most of the rest of our federal funding comes in the form of either grants or funds like VOITUS funds, which were not grant funds, but

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they were federal dollars tied to in that particular instance prison construction. If you pass truth in sentencing, Congress used those funds as a carrot to get states to pass the 85 percent laws And if you'll do that, in other words we'll give you these funds to help you build prisons with. So all the states did it. Of course those funds did not create those prisons nor did they continue to build those prisons long after those 85 percent laws were on the books and those federal funds were dried up The other source of funds we have revenue funds Most of our revenue funds are generated from our canteen sales and our prison industry operations
Q You arrived in January of 2003 and determined at some point in the spring I understand from the documents that have been provided to me that a reduction in force would be implemented Is that correct?
A Repeat that again.
Q Sure You arrived as executive director in
A I was I was thinking about agriculture funds going into the revenue funds account by the way Sorry

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Q Well let's back up a little bit. You were appointed by the governor to serve as director of this department. And you arrived as director in January of 2003
A. Yes sir
Q At what point thereafter did you determine that a reduction in force would be implemented?
A. I cannot give you a specific date I can tell you kind of what went into it
Q Please do
A You know if you remember a big issue in that election cycle was the fiscal condition of the state We had had actual revenue decreases which is the way you and I .. you and your business would consider a revenue decrease, having less money coming in this year than you had last year Most of the time in government revenue decreases are when you don't grow as much as you thought you were going to grow They'll call that a decrease Our state had had two or three years of actual revenue decreases in real dollars Less money coming into the coffers in year two than you had in year one And so there were some agencies out there that were going to run deficits according

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to the Hodges administration, the previous administration This was one of those agencies And they had been, you know forthright. It's not the kind of thing you can hide When I got there I was before I got there I was led to believe and the information that the incoming administration had been given was that our deficit was going to be about nine billion bucks. I don't know how quickly I figured out that it wasn't going to be nine million bucks but it wasn't going to be nine million bucks It was going to be over thirty million I really do think that that caught some people off guard. I know it caught the incoming governor off guard. It caught me off guard. I also think it caught some House and Senate leadership off guard. Because that'll really tap into your we weren't the only agency that was going to run a deficit, but that .. that makes a dent in your reserve funds. So in looking at what we had the agency had told or had led people to believe and then where we really were going to be fiscally at the end of the year and also in listening to and in just realizing that you

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can't survive somebody else is going to cut your budget for you if you don't show some progress in controlling that deficit And I knew that to be the case from some indirect communications from Senate leadership and from some you know often time politics being what they are people communicate through the media. And so when you read the chairman of the Senate Finance Committee making statements that Corrections really has to get their spending under control you know you've got to do something. And so we knew from reporting our deficit to the Budget & Control Board which took place at some point before June that we had to do something. And, quite frankly I mean the governor's office also wanted us to make sure that we were doing everything we could to live within the amount of money that we've been .. that had been appropriated for us. And so as quickly as we could, we looked at what we had lost over those three years where we had attrited. I mean we had attrited from 7,000 employees down to 5 600

Q When you say we, who are you speaking to?

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A The department.

Q That would be your speaking ..

A The agency No no no no This had been attrition that had started before I got there.

Q I understand. But when you're talking about we were looking at I want to know who that is

A That's the senior leadership of the agency and in conjunction with the governor's office my my communication with the governor's office.

Q Did you include the superintendent of the school district in that group?

A To some extent. Once we decided where the cuts were going to be yes we did. It wouldn t make much sense the decision as to whether or not we were going to have to cut had been made for us In other words our financial situation was such that you just can't do nothing. And this was going to be not a whole lot of benefit to us in year one because we were well into the back half of that fiscal year We wanted some .. we wanted to get anything we could in year one, and we did some other things unrelated to this RIF in terms of retiree, hire, that kind of thing to try to get

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some savings in the in year one, and we did. We got down below thirty million bucks We ended up with several million dollars worth of savings independent of this independent of the RIF in other words But the decision to do the RIF and decisions as to where to cut, I didn't think I'd have much success going to different functional areas of the agency and saying hey I'm going to cut your agency is that okay with you So what we had to do is to look at where the cuts had come before, where we had bled bodies because that's that's our money And you can look at this document and realize that that's where .. that's that's a variable that we have control over We had RIF'd over 800 security staff. Not RIF had attrited over 800 security staff

Q And by that you mean had not filled vacancies?

A. And I think they had actually offered some retirement incentives and had closed two prisons. So it was more than just not filling vacancies. But a hiring freeze in your security ranks is much different than a hiring freeze somewhere else because we turn over 33 percent at that time When I came in it was 33

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percent in six months 75 percent in two years In other words we lost three out of four When I came in we were losing three out of four of every four officers we hired within the first two years of hire

Q And you're talking about correctional officers?

A. Right. So attriting there was ... was obviously the path of least resistance, but it's also the path that makes you most dangerous And so we just didn't look at our security charts and knowing where we had to have bodies, there was no freeze on security hiring when I got there, and I wasn't going to cut that anymore. We had cut every other functional area in the agency I think, with the exception of medical ... medical, security and food service had been subject to a freeze There had not been any reduction in force done. And I, you know this administration I knew the governor's office well enough and could feel the pressure from the House and Senate well enough to know that we needed to actively do something. So we identified where we could cut the fewest people and save the most money and do it safely And the other

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principle that we tried to live by was to cut headquarters disproportionately in other words in greater proportions than we cut anybody in the field And so that's what we did And by final design, or by design in the final analysis over half of our cuts came from headquarters functions and the other half came from institutional functions And we made we just wanted that. We felt like that sent the right message to our institutions that they shouldn't have to continue to bear all the brunt of the fiscal pain that the agency was suffering. And the other reality was we just simply couldn't afford to cut more bodies more security bodies out of prisons

Q Let me hand you a document and ask you to take a look at it if you would, please This is going to be Exhibit Number Sixteen.

(Plaintiff's Exhibit Number Sixteen was marked for identification purposes)

Q And as we mentioned earlier Mr Frederick was an interim director of the department This particular document comes out of 2001 and addresses an action that was taken at that time to deal with some budgetary issues through

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temporary and dual employment employees employees who had not reached permanent employment status known generally as probationary employees and temporary employees Did it occur to you and your team in 2003 to explore as one element of your cost savings going through a similar type process?

A Yeah And, in fact, this .. I knew that that had been done Unfortunately what you wind up doing when you talk about safety in prisons much of your safety is driven by ratios And if you take this particular action, you're going to disproportionately affect security because if we hire a hundred people in a month, 80 percent of them are security probably more probably more like 90 And we'll hire a hundred people in a month So what you wind up doing is eliminating your lowest cost employees So you lose more bodies from inside your institutions and save less money in doing so So make yourself less safe than if you picked higher cost employees And that's multiplied by virtue of the fact that your security staff are your certified I mean that's what they are They're the only

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certified law enforcement officers you have They're the folks that really control the population. Everybody that works inside a prison is security But when you get down to the ratios that we were then and still are now functioning under you really have to be mindful of the fact that our staff to inmate ratios are the highest in the country In other words we've got fewer staff supervising more inmates than there may be one or two prison systems right now that are in that have higher inmate to staff ratios than we do but there aren't more than two And we were in that condition then So the decision to do something like this where you're basically taking a shotgun approach and you know from reality your hiring practices that who you're going to be eliminating are .. what you're going to do is eliminate more people and save fewer dollars than if you and this is clearly the path of it is an easier thing to do It's certainly the more acceptable thing to do because you don't run into the whole entitlement idea that I'm entitled to my job and this kind of thing doesn't arise out of

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it. Those probationary employees aren't entitled to bring certain they don't have certain rights that the other employees do But the reality is they cost you a whole lot less

Q Let me take that one step further Now in your reduction in force, you made the determination at some point apparently early on that you were not going to include correctional officers in the groups that were to be RIF'd. So you had made a conscious decision that whatever happened in the reduction in force it wouldn't adversely affect that group of employees. Isn't that the case?

A. I didn't want it to I later learned because of the silliness of the bumping rule that that could happen. And I fought against that tooth and nail, but my understanding was that under certain circumstances we could actually wind up bumping a lower cost security person for a higher cost certified person. Which again, in state government, that may make all the sense in the world to somebody It makes no sense to me But I think that did end up happening.

Q Well, under OHR rules, isn't it the case that

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if an individual bumps another individual, they can be held at the same salary level as the person departing?

A. Within certain ranges I know that to be true I would agree with you I wouldn't agree with you with that much precision but I know in general principle you can require people who bump down to take a salary cut of a to a certain extent. And we did do do that.

Q. But let's talk about this particular RIF You realized during the process that you had some discretion in identifying those positions or categories of positions that would be subject to a reduction in force And I believe your records show that you did make certain exclusions on the basis of what you've articulated this afternoon that you would not be reducing correctional officer personnel My question goes to this. Having made that decision and having categorized those who would be subject to reduction in force did you then take the next step to say in those categories are there temporary employees are there probationary employees are there so-called pink slip employees who we can eliminate and

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then evaluate from that point those positions which then need to be reduced? Did you take that step?

A. At some point, yes At some point we did consider what we could save from doing temps on a variety of formulas, temps and probationary on a variety of formulas I cannot recall with absolute precision Almost everything that we could possibly that anybody in the room, anybody on executive staff could .. could think of to do this as painlessly as possible and come up with a meaningful number was considered. And I do know I do I know for a fact that temps were considered in a variety of different formulas But the problem one of the big problems was you couldn't come up with a very big number in terms of dollar savings And I think part of that was because it had been done before And so really the only temps you had you didn't have many temps working at this time The only probationary employees you had working would have been obviously within the past year And the only people we were hiring were nurses, food service and correctional officers and

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security So we're only hiring those three So if you do your probationary temp formula you don't get many numbers. There may have been somewhere across the agency some temporary employees working that had been where some previous director had made exceptions but there weren't many And so what you're going to wind up doing is cutting the very people for whom you have by necessity lifted the hiring freeze And only those three areas were not subject to the hiring freeze. So we were really in a box. I mean you can't not feed inmates You can't not treat them when they're ill and you cannot I mean we just could not continue to bleed our security ranks

Q. Did it concern you when you went through this process that at some of the educational institutions the only state funded instructors left were the pink slip employees?

A. It did, but on the other hand they were more we got more value for the dollar from those.

Q. Because you didn't have to pay benefits is that the case?

A. Not only because we didn't have to pay

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benefits, but because the total cost was lower absolutely So you get more value for your dollar by using temps And we've quite frankly, continued with that model We have we continue to hire part-time instructors. And we have done more Really we've improved our GED rates And I think this is a function of a lot of different things, not .. not just the RIF I think the rates would have improved anyway One, because I insisted that they improve and I think I intended people understood I intended to hold higher education staff leadership accountable for GED rates. And then I there were some other things. But what I'm saying is in the three years since then, our GED rates went up every single year So we have half the number of people. We're spending half the dollars and getting more outcome So we've reduced the cost of a GED to the tax payer by more than 50 percent. At the same time, two years running .. the first year I don't think we set a record for the agency, but we did improve over the year before So we had twice the staff. And the year that we have half the staff, we improve

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the number of GEDs awarded The next year we set a record for the agency The next year after that we set a record for the agency And I believe this year we're going to set another record for the agency So half the cost to the tax payer Doing the same thing on the vocational side by by by using by not being tied to certified staff What we want an inmate to have when he leaves is a certificate so that when he shows up at a job site he can get a job And in order to do that and live within our budget, we have used and we continue to use part-time instructors to do that And obviously, you can't get certified part time instructors So we're getting who we can get, people that have that skill I mean if you're a master plumber, you can teach a willing inmate how to plumb And if you're same thing for carpentry and brick laying and those types of programs where we have been able, again, at incredibly low costs to open up two vocational programs in every single level two and three institutions and do so like I said, at half the expenditures that the tax payers were paying

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for before this RIF So it was born out of necessity It has worked out well in terms of being a cost benefit for the tax payer and a benefit for inmates because inmates are more of them are succeeding now

Q When you were going through this process did you review the Palmetto Unified School District budget and expenditures?

A At some point I am certain on numerous occasions I'm certain I looked at it I could not remember what I what the numbers were precisely off the top of my head now

Q I'm going to show you a series of documents that have been produced by your department. I'm going to ask you to take a look at them for me if you would.

(Plaintiff's Exhibit Number Seventeen was marked for identification purposes)

Q What I've handed you as Exhibit Number Seventeen has been represented to me to be the fiscal year 1999-2000 Palmetto Unified School District budget and expenditures Do you see that?

A Uh-huh (affirmative response)

Q You have to answer for the court reporter

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A. I'm sorry, yes, yes

Q This was before your arrival at the department. It does show however various sources of revenue for the department, I believe characterized by state EFA, EIA and federal Do you see that?

A Yes.

Q As well as the category they have below called other And in this it shows that at that time there were funds carried over from one fiscal year to the next from the EFA account Do you see that at the bottom of the page?

A Yes I well, at the bottom I see I see EFA carry-over not at the bottom of the page. Yeah, I see 334, 99 334 carry-over on EFA funds yes

Q So at that point in time the department's school district was operating in a manner in which at least for these purposes it shows that there were for 1998 99 $13 037 305 and then projected for the next year slightly over fourteen million with some carry-over of EFA funds Do you have any reason to challenge the accuracy of the numbers in this particular document?

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A I don't have any reason to challenge the accuracy It doesn't show a carry-over A carry-over of $334 000 that cost you nine million is I mean, again there s .. there s no the school district was in no better shape financially than the agency because the school district is funded directly out of agency operating funds So this doesn't show that the school district I don't have any reason to contest the numbers I would contest that this shows that the school district was some type of separate financial entity from the agency because it is not. And so if I don't spend that nine million dollars in state funds for the purpose of drawing three to four million dollars in EFA and EIA funds, then I have that nine million dollars to spend on operational requirements

Q The other elements of this the EFA, EIA, federal are not contingent on the state allocation?

A They are. They are contingent by my understanding, at least most of them on state spending. Yes sir they are.

Q So as you understand, as the

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agreed to take the job as the corrections director in the State of South Carolina where nobody gives a flip about funding corrections And so education wasn't an absolute necessity That's that's one of the dumbest public policy statements that I think could ever leave a person s mouth. But I didn't create the mess It was there And the deficit had to be dealt with

Q Now were you speaking .. when you speak to that issue, are you speaking to education for adult inmates?

A. I'm speaking yes I'm speaking to Wendell s frustration and his I thought my reaction to this memo was I think that's entirely reasonable Now I'll tell you that Wendell s numbers are almost never right. If you did our education spending and broke it down it won't be 60/40 We bear we bear many state appropriations Our operational budget bears much larger percentage. But in corrections quite frankly there he does have a legitimate point in that it's the only place we're not drawing anything for doing something good In most other agencies, you

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know you draw a third, you draw 25 percent. Sure I can spend seventy cents and draw thirty in education. But that seventy cents bought me less in education than it bought me anywhere else in the agency in terms of the number of bodies that I could put inside our institutions So again that goes back to the reason for this When I got this, I made the decision, okay I think that's entirely reasonable. And we did allow Wendell and his folks with John Near and all of us you know sort of coming behind to develop a plan that would allow him to accomplish as much as possible with the resources that we were going to be able to leave for him to spend.

Q But ultimately isn't it true that when the decision was made as to those positions that were going to be eliminated, that decision was made at your office and was not made by the superintendent of the school district as it related to the educational positions that were eliminated?

A No no

MR. SUMMERS Object to the form of the question Go ahead and answer

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A But the answer to the question is no that's not true Our educational cuts were based precisely on input from Wendell I don't recall .. I doubt that we were able to follow his input one hundred percent. But I can tell you that he had significant input, and that we did follow as much as we could his input. But understand as far as the second part of your question was did the ultimate decision rest with me I can I can guarantee you there's nobody else in that agency that, by virtue of what we were about what I had inherited it was never going to cut anybody wasn't going to happen I couldn't leave the decision to Wendell Blanton. He wouldn't cut anybody I couldn't leave the decision to John Near I love him to death. He wouldn't have cut a soul. I mean it's .. it wasn't going to be done It had not been done to the tune of thirty-three million bucks when I walked in the door So I had no reason to hold out hope that that it was going to be done suddenly out of the blue because we were looking at thirty-four plus a dollar

Q Do you remember informing an employee of your

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department that one of the reasons that educators were cut is because they were paid too much, and another was that they were disloyal because they had sued the agency to increase their pay?

MR. SUMMERS I object to the form of the question, but go ahead.

A. Yeah. No I never made any .. I never made either of those statements in the way you characterize them. I I made a public statements that were precisely why we chose to cut where we were. I don't know if you have we put out I know we put out a press release on it. And so it it was true that we did try to cut in a way where we kept as many people and occurred ... and incurred the greatest savings. As for the other the allegation that I made a statement what did you say the second statement was? That ..

Q That the teachers had gotten a raise and security had not gotten one and that you would not have sued the agency to get more money because it was wrong.

MR. SUMMERS Again I'm going to object to the form of the question as responsive.

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A That didn't have anything to do I never made that statement. I certainly never attributed the cuts to anything that .. to any lawsuit or decision to sue. In fact, I don't know at what point. I know I found out about somebody informed me about the teachers suing and all that at some point before the RIF actually went into effect, but it wasn't anything that I mean we were far down the road to making the decision before I even knew that that had taken place And I mean it was common knowledge in the agency that when no that agency again was running a deficit And in years that that agency had run a deficit, I did know that teachers because of the teachers pay scale had gotten an increase I don't think that that had anything to do that had nothing to do with the decision to RIF I imagine that that kind of policy decision well that kind of policy decision does have an impact on how much bang you get for your buck. In other words for making cuts in the most efficient manner possible so that you get .. so that you keep as many people as you can, accomplish the missions that you absolutely

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have to accomplish and save as much money as possible, which was the parameter of you know that was the dynamic we were trying to accomplish That was that was the goal we were trying to accomplish in making these RIFs So I guess those raises might have worked to the teachers disadvantage in the sense that it made it meant that by cutting by riffing one teacher you were basically saving two correctional officers. So in that respect

Q Is that like with the calculus that you used when you were going through this process?

A. We used the parameter of insuring safety trying to accomplish our absolute core essential missions those things that we must do and saving as much money as possible while having the most .. while having the least impact on the operations of the agency

(Plaintiff's Exhibit Number Nineteen was marked for identification purposes)

Q Fair to say that around March 18th, there abouts in 2003 when Mr Blanton was sending this memo to you, you were in the final stages of bringing your reduction in force together?

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A No sir because the final product was greatly influenced by what Wendell Blanton presented to us So we were well along the decision making process to obviously, the decision that we had to cut, and we had to come up with a pretty good number big number for savings in year two three and out. That decision had been made but we were not because we depended on Wendell's input as to how we would make the cuts in the education program, it wouldn't be fair to say that we were in the last stages

Q Would you be surprised if Mr Blanton testified and told his board that the cuts were handed to him essentially as a done deal and that he didn't have a role in selecting the position?

MR. SUMMERS Object to the form.

A. I wouldn't be surprised. I'm I'm there wasn't a soul in that agency that was pleased with having to cut. I .. he would be wrong. He would be mistaken if he if he made that statement. It might be fairer to say .. if in making that statement he meant to say that the fact that education was going to be cut, was going to be a subject of the reduction in force, that decision had been made. If he

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so it depends on what he meant when he made the statement. If he meant that we handed him the document, the final RIF document and said this is the way it's going to be done within education, then he he would .. he would not be accurate in saying that. If he meant that he was told as he was that education was going to be a significant subject of this RIF then he would be he would be that would be a fair statement for him to make.

Q Is it your recollection that at some point in time there was information provided to Mr Blanton that the competitive areas are going to be these, the numbers of positions eliminated in education are going to be these do you have any suggestions or objections to this; did that process take place?

A. I don't know whether it was that precise, but I do know that cuts cuts equaling a certain amount are going to take place in education. And you, by memo have indicated that you would like to have some input in that and we ... this is your chance. And I do remember that he was given a specific amount of time by me to bring a plan back. Now, again, he is accurate in

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would almost presume that when they sat down and he's reviewing his sheets side by side after he conducted those interviews and he just looked back at candidate three and you know you know candidate three answered the security question better than candidate two but I gave candidate two an A and I gave candidate three an A I need to change candidate three to a nine. Because of the initials and not knowing anything else, that's what I would infer because I've made more changes than this on on these forms you know

(Plaintiff's Exhibit Number Five was identified for the record)

Q Let me ask you to look at Exhibit Number Five for P.B.'s score for Mr Bell, who is the plaintiff in this case and ask you to take a look at that, please sir

A Number Four was for Mr Yarborough.

Q Number Five is for Mr

A. Number Five is Mr Bell.

Q Yes, sir Do you see something that appears to be a change?

A No I see several numbers that appear to be changed. One, an eight looks like a nine

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to an eight.

Q Yes sir

A. Looks like looks like nines to eights And again, I can't if that took place in the interview or after the interview actually I'd say this If that change was made by P.B then who is I don't know who P B is If that took place if that change was made by P.B I would see nothing inappropriate about it because in making comparisons between candidates sometimes you just have to make those adjustments

Q Let me take you one step further Of course, you noted that in the exhibit relating to Mr Yarborough, P B actually initialed her change.

A. Right.

Q There is no initial on this change is there?

A I don't initial. I wish I could tell I initial mine, but I don't.

Q And it appears to be would it surprise you Mr Ozmint if that change the combination of the two changes by P B resulted in Mr Yarborough going past Mr Bell by two points the combination of giving Mr Yarborough an additional point and taking three from Mr

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Bell?

MR. SUMMERS Let me object as to the form, but please answer the question.

Q Wouldn't it concern you that it might be more than coincidental that those changes resulted in one person going above the .. leap-frogging above the other on the list?

MR. SUMMERS I'll renew my objection, but go ahead and answer

A But the answer is .. without some allegation that some third party made that change later on it wouldn't concern me at all So I mean because I .. I have been in too many of these, and I know what you have to do You have to do .. you have to step back after the interviews And the way I do it is let everybody sort of step back on their own before we start discussing it and adding up scores And so I would .. it wouldn't .. it wouldn't concern me at all seeing it in this There's actually in that same Exhibit Five one of the other sheets looks like it's .. number 44 looks like they had a problem in transcribing the six to a six on the years Looks like they had, you know I mean I could look at that

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seven on security and think, gee, you know they they had some question about security They .. a lot of times you'll just kind of make a note on a yellow sticky and before you put it on a form, people will do that. I don't hesitate to write it on the form and then cross through it and write another number

Q So nothing you see here rises to the level of even though Mr Yarborough is the brother in-law of the Associate Warden, and even though P B works in Tyger River and even though there were these changes which coincidentally resulted in Mr Yarborough getting this job none of that would rise to a level of suspicion for you

MR. SUMMERS Object as to form.

Q as a former prosecutor?

A. Well, that's not what you

MR. SUMMERS Object as to form.

A That's not what you asked me the first time Those facts alone .. now with regard to our policy with regard to hiring family members, I would I would have to .. quite frankly I'd have to review that. I don't think there's a prohibition. There are prohibitions in

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APPENDIX E

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MR. SUMMERS Object as to form but Mr Near, go ahead.
A. I don't know that I have an answer to that question or that I really understand it.
Q. Well let me make sure I can hopefully make it clear to you. Let's assume that I'm employed in a school district. I am a teacher that teaches in school A. And there are two positions eliminated. One of those is mine and one of those is a position in school B No positions are eliminated in school C but I have seniority as to the teachers in school C who teach my same subject. Ordinarily I would have the right to bump one of those persons, would I not?
MR. SUMMERS Objection as to form but go ahead, Mr Near
A. You would have the ability to bump into school C only if school C was considered as a part of that geographic area for bumping purposes
Q. Exactly And unless otherwise confined in the Palmetto Unified School District I would have statewide bumping, would I not?
A. No I don't no I don't know that I would agree with that.

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Q. Well, what's not to agree with? Let's go over this one more time Let's make sure we understand each other Let's assume as the law says that this is a statewide unified school district. Let's assume that between the two of us Will you do that?
A. Okay
MR. SUMMERS I'm going to object as to the premise and the form of the question, but obviously Mr Nickles can continue.
Q. So we have a single statewide school district and there is a reduction in force in that single statewide school district Let's assume that to be the case okay? You have to answer
A. Okay yes
MR. SUMMERS Same objection.
Q. Now, unless that school district is somehow divided up artificially then I have the right to bump into any other school in which there's a position which I have seniority Would that be fair?
A. If you are dividing the state into a single geographic area and you have a reduction in force and you wanted to have the ability to bump within that one geographic area, then yes

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An individual could bump within that area
Q. So if the General Assembly for the State of South Carolina, not John Near created a single unified school district, then the General Assembly has expressed its purpose to have all those individuals treated uniformly Would that be fair?
MR. SUMMERS Objection as to the premise and to the form, but Mr Near
A. Again I don't know that I could answer I couldn't speak for for what the General Assembly would intend or not
Q. Well, you're familiar with the lawsuit that was brought by teachers of the Palmetto Unified School District to have their pay elevated to the statutory minimum, are you not?
A. The agency did have a settlement on a lawsuit several years back, yes
Q. And wasn't it the premise of that lawsuit that there was a single unified school district in which all teachers had to be paid on a similar basis?
MR. SUMMERS Objection as to form. Mr Near
A. I don't know that I know the answer to that question.

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Q. Didn't the Court of Appeals for the State of South Carolina find that there was a single unified school district at the Department of Corrections?
MR. SUMMERS Objection as to form.
A. Again, I don't know
Q. So whatever the Court of Appeals found, they found but you don't have any knowledge of that at this point?
A. No sir
Q. But certainly you didn't look at that when creating these geographic areas within the Palmetto Unified School District?
A. No sir
Q. Who created the competitive areas for the reduction in force?
A. I would say that I probably initially would be the one who created the competitive areas for the reduction in force.
Q. Did you consult with Superintendent Blanton of the Palmetto Unified School District in creating those competitive areas?
A. Again, I had meetings and consulted with a number of management within the agency which included the agency director, general counsel

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A That's correct.
Q Notice anything unusual about this applicant evaluation?
A Not off hand no
Q Well let's look at security listing. That's obviously a changed from an eight to a nine has it not?
A Yes
Q And then the sum was marked out and a new sum, fifty-nine with the initials P B is listed there Do you see that?
A Yes
Q So based upon this document it appears .. and we don't have the original but we may subpoena that. This document appears that there was a change from an eight to a nine and an increase in points by Ms Burnette correct?
A. Yes
Q And we see the next one is looks like HRS perhaps or HS That apparently is Hoyt Sharpe
A I believe so yes.
Q He has a total of forty-four there. There's a post-it. Can you make out what that post-it says?
A No

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Q And then there is another one by J C. I guess that would be Joseph Counts with a total of fifty-two Do you see that?
A. Yes
Q Let's remember those numbers fifty nine from Ms Burnette and forty-four for Mr Sharpe and fifty-two from Mr Counts I'm going to add those up That's six and nine is fifteen .. ten one fifty-five Is that accurate?
A If you
Q I believe it is Nine and four is thirteen, two's fifteen, six and four is ten, five one fifty-five.
MR. SUMMERS Mr Nickles allow me I came to the same total using my West Virginia University math skills
MR. NICKLES All right.
Q Let's look further into this document We see on page three of the application it has the question do you have a relative or former spouse working for this agency and the answer is Barnie Lloyd, brother-in-law Tyger River You see that?
A Yes
Q What position does Mr Lloyd hold at Tyger

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River?
A. Associate warden.
Q That's under the warden?
A. Yes sir
Q That's a pretty high up position at Tyger River?
A. It'd be the number two position
Q Number two man at Tyger River?
A. Yes.
Q Then you look over at work experience. And the last employer Union County Sheriff's Office $14 60 a week .. I mean an hour and may not contact this employer Do you see that?
A. Yes
Q So Mr Yarborough, if he's being accurate about his $14 60 a week, he's making a little under $600 a week, 40 hours a week as a deputy sheriff. That's what he s listed as his 42 hours a week. So right at $600 a week. Would that be about right?
A. Yes.
Q Then you look further into this at the third page from the back, it's Department of Education transmittal to Mr Yarborough. Do you see that? Keep going It's about the

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third page from the back of the document. There we are
A. Yes
Q See that document?
A. Yes
Q Dated March 13 2006?
A. Yes
Q The document states this is not a teaching certificate and you must complete the following institutes during your first year of certification. Do you see that?
A. Yes
Q So while the department could hire Mr Yarborough, he was not certified and had to carry out additional duties to obtain the certification, correct?
A Yes
Q Then there's a report of employee or inmate relative which follows this And this is directed to you from Kelvin Perry Do you see that?
A. Yes.
Q And remarks brother-in-law works at facility and you sign off on approving this selection Do you see that?

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A Right. My assistant signed off for me, but I would have I would have approved that, yes
Q That was with your authority was it not?
A Yes sir
Q And the last document in this particular set is a letter of March 20 from Connie Riley to Mr Yarborough telling him that he has been selected for the position of vocational teacher at Tyger River Correctional Institution and his starting salary is $40,284 per year I guess is that right?
A Yes
Q That would be a significant pay increase from being a deputy sheriff in Union County wouldn't it?
A. That would be a significant increase from being a deputy sheriff in Union County yes.
(Plaintiff's Exhibit Number Five was marked for identification purposes)
Q I'm going to hand you a document that's being marked Exhibit Number Five and ask you to take a look at that series of documents if you would, please Once again, the an applicant referral report is the first page Do you see that?

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A. Yes
Q And this lists as this is for James C Bell, is that correct?
A Yes
Q And this lists his employment history does it not?
A Yes
Q Perry Correctional Institution program coordinator, School District of Green, I believe, is Greenville vocational building, Generations Group vocational carpentry, SCDC Perry Correctional Institution teacher position eliminated by reduction in force Do you see that?
A. Yes
Q He had been a teacher from 1992 to the elimination of his position in 2003 and had been previously employed in Tyger River as a vocational teacher for three years Do you see that?
A. Yes
Q There's a handwritten note on the side of this 2/15/06 originally 524 What does that mean?
A. I don't know specifically what 524 means
Q Very difficult position to fill What's that

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referring to?
A. As I understand from when you originally asked for the .. for the information on this they had announced the position and only had the two people apply I believe.
Q S/O what does S/O
A. Selecting official
Q wants to consider policy admin 11.28 requirement waived. What does that mean?
A. It's possible that what what a code 524 means is that individuals that are in a position within our agency an individual cannot make a lateral or downward move during their initial six months or probationary period within the agency It's possible that .. I see the the on the employment history that his start date as Perry as the program coordinator was January of '06 Since this position was just a couple of months later it could have been considered as a .. as a move during that period, but they wanted to make sure they waived that to consider
Q And the position being considered here vocational teacher is paid a significantly higher rate than the program coordinator

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position, is it not?
A I don't know that for sure, but I would assume so yes.
Q And the vocational teacher position is one, according to this record, that Mr Bell had occupied prior to his reduction in force Isn't that what it says?
A He was a vocational teacher prior to the reduction in force, yes
Q Both at Tyger River and at Perry?
A. At yes
Q The next document in this series, and if they are upside down, please correct them, is an applicant evaluation by J C We've agreed that's Joseph Counts and that's a fifty-one. You see that? Do you see Mr Counts?
A. I do, yes
Q And is his a fifty-one?
A. Yes
Q The next one is P.B who we've agreed is Mr Burnette who is there at Tyger River See anything unusual about this one?
A. No nothing unusual.
Q Well let's look at it. Look at the entry for flexibility Hasn't that obviously been

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A. It's very common that during the interview process that interview sheets are reviewed and changed and re-evaluated obviously
Q Did you talk to Ms Burnette about the reason she made her changes so that Mr Yarborough would be rated ahead of Mr Bell?
A No I did not.
Q You didn't even notice that that had taken place before I brought it to your attention, did you?
A No, I did not I did not know that a position was open, actually
Q You think it s more than coincidental that Mr Yarborough is a brother-of-law of Ms. Burnette's boss ..
MR. SUMMERS Objection as to form.
Q .. and she changed her rating of Mr Yarborough?
MR. SUMMERS Objection as to form.
A I have .. again, I have no knowledge of that
Q It would raise suspicion in your mind as a supervisor if someone came to you and said, gee John, Ms Burnette changed this and because of this change, Mr Yarborough the son-in-law of her boss, got the job? Wouldn't

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that make you ask Ms Burnette why she changed it?
MR. SUMMERS Same objection.
A. I think if someone approached me and asked me a question the way you asked it, certainly I would I would certainly be interested in what you were saying.
Q So you can understand my curiosity about this process?
A. I can understand your curiosity yes
(Plaintiff's Exhibit Number Six was marked for identification purposes)
Q I'm handing you a document marked Exhibit Number Six, I believe and ask if you are generally familiar with this document.
A. Yes sir
Q And is this the document submitted with attachments to the Office of Human Resources for approval of the agency's reduction in force?
A. Yes.
Q Did you have any role in preparing this document?
A. Yes.
Q What role did you have?

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A. I would say I primarily prepared most of it.
Q So you prepared this document for review approval and signature by Agency Director Ozmint, is that correct?
A Yes
Q Did he make any significant changes in it to your recollection?
A From the time that it was initially drafted until the time it was done, I'm sure he would have made several, yes but I certainly don't recall what they are
Q And in your preparing this did you attempt to provide an accurate factual background as the reason for the reduction in force?
A. Yes
Q And that is contained in Roman Numeral II entitled reason for the reduction in force?
A. Yes
Q What is the primary mission of the Department of Corrections?
A. At that time the primary mission was to insure the safety of the public.
Q Did the presence of teachers cause any danger to the public at the Department of Corrections?
MR. SUMMERS Objection as to form.

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A. I would think not, no
Q Is rehabilitation a part of the mission of the Department of Corrections to your knowledge?
A. The overall mission would certainly be rehabilitation, yes
Q And is the educational program an integral part of the rehabilitation process?
A. Again, I don't know that I specifically know that, but I would assume so yes
Q In this statement, Mr Ozmint indicates to Mr Wilkins, I've made the decision to eliminate 148 non-security positions through a reduction in force in three primary functions within the agency Do you see that?
A Yes
Q And he lists three areas headquarters management, administrative staff non-essential inmate support programs and finally certified education and support staff Do you see that?
A Yes.
Q He does not identify the percentages or the numbers of the reductions in those three areas does he?
A. No
Q But you are aware that 84 certified education

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Defendants/Respondents	)	

APPENDIX F

Read the following and place your initials in either the "Yes" or "No" space as it applies to you If you leave it blank, it will delay the processing of your application

	"YES"	"NO
Do you currently have any court ordered restraining order(s) against you with regard to family members or cohabitants?	____	LEG
Have you ever been arrested?	____	LEG
Have you ever been charged with a crime?	____	LEG
Have you ever been convicted of a crime?	____	LEG

READ THE FOLLOWING AND PLACE YOUR INITIALS AT THE END

Examples of crimes, other than minor traffic violations that must be reported are Driving under the influence of intoxicating beverages or other drugs fraudulent or bad checks disturbing the peace leaving the scene of an accident You must list all arrest(s) and conviction(s) below even if you were pardoned, paroled, had a suspended sentence/probation or the charges were dropped or dismissed. This information may not disqualify you, but must be listed below regardless of date or type of offense. Please be advised that, if you were convicted of a crime of a maximum allowable sentence of one year or more or a crime of moral turpitude we may not employ you as a Correctional Officer An arrest or being charged with a crime includes being fingerprinted or simply having had a warrant issued. Regarding disclosure of arrest record, applicants who have received an Order of Expungement from a court of competent jurisdiction are not required to list/report such arrests Background checks will be made to include a FBI check. Please ask the Human Resource representative for clarification if you are unsure if you were arrested.

BY MY INITIALS, I HAVE READ AND UNDERSTAND THE ABOVE LEG

ANY FALSE STATEMENT OR OMMISION OF FACTS, MAY BE CAUSE FOR TERMINATION

Charges	Arresting Authority & City & State	Disposition (Results)	Disposition Date	Convicted Yes or No

Have you ever been fingerprinted? (✓) Yes ( ) No If yes please give approximate date(s) and reason 1998 Employment With City of Ukiah Public Safety

Have you ever been an inmate in an SCDC Institution, Federal Institution or Penal Institution of another jurisdiction? ( ) Yes (✓) No If yes, charge dates where and type of sentence ____

Are you or any member of your immediate family related to or have had a close personal relationship with anyone who is currently or was previously an inmate in a SCDC Institution? This would include spouses, ex spouses, common law spouses, mother father mother in-law father in-law brother brother in law sister sister in law son, son in-law daughter daughter in law grandfather Grandmother Grandchild, aunt, uncle, cousins any step relatives boyfriend or girlfriend ( ) Yes (✓) No If yes name relationship, charge dates, where and type of sentence LG

Are you currently or have you ever visited an inmate at any SCDC facility? ( ) Yes (✓) No If yes, inmate name and relationship LG

Please give the name and a description of any relationship you have or have had with any inmate currently or previously incarcerated in an SCDC institution. LG

Do you have a relative or former spouse working for this agency? (✓) Yes ( ) No If yes, name, relationship (to include degree of cousin) and where: Beesley Boyd / brother-in-laws / Tyger Rice, LG

Have you or any member of your family ever been a victim of a crime committed by an inmate who is incarcerated at SCDC? (✓) Yes ( ) No If yes, name of inmate, dates, and location of crime unknown (house broken into)

Have you or any member of your immediate family ever testified in a case involving an inmate incarcerated at SCDC? (✓) Yes ( ) No If yes, name of inmate, dates and location of crime numerous due to Public Safety and Sheriff Position Deputy

Have you ever been deemed ineligible for employment by this agency or any other employer? ( ) Yes (✓) No LG

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF RICHLAND	)	FOR THE FIFTH JUDICIAL CIRCUIT
James "Cal" Bell, Othella Bernard Katherina Bower Linda M W Bratton Ann T Bridges Rance C Cobb Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr Ruth Fritts Nancy Glenn, Etta Jane Jones Geneva M Martin Mary H McCabe, Beverly McClanahan, Max D Randolph Carolyn McIver Smith, Maggie G Williams and Paula Woodlief	)	Civil Action No 04-CP-40-1761
Plaintiffs/Petitioners	)	**MEMORANDUM IN OPPOSITION TO THE PETITIONERS' PETITION FOR JUDICIAL REVIEW**
-vs-	)	
South Carolina Department Corrections and Palmetto Unified School District No 1	)	
Defendants/Respondents	)	

APPENDIX G

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
Division of Human Resources
REPORT OF EMPLOYEE AND/OR INMATE RELATIVE

FROM Kelvin Perry Recruiting & Employment Services Branch	TO John Near Division Director of Human Resources

CURRENT EMPLOYEE OR NEW HIRE CANDIDATE (Type or Print)

NAME Harry Yarborough POSITION VOC Teacher

DIVISION/INSTITUTION Tyger River CI PROPOSED HIRE DATE

REMARKS Brotherhood Works at Facility

EMPLOYEE RELATIVE

NAME Barney Boyd POSITION Associate Warden

DIVISION/INSTITUTION Tyger River PROPOSED HIRE DATE 12-13-1982

INMATE RELATIVE

NAME _____ INMATE NUMBER _____ RELATIONSHIP _____

INSTITUTION _____ DATE INCARCERATED _____

OFFENSE _____ RELEASE DATE _____ (IF KNOWN)

NAME _____ INMATE NUMBER _____ RELATIONSHIP _____

INSTITUTION _____ DATE INCARCERATED _____

OFFENSE _____ RELEASE DATE _____ (IF KNOWN)

RECOMMENDATION (Give reason for disapproval)

APPROVE DISAPPROVE

John A Near Jr

HUMAN RESOURCES DIRECTOR

ORIGINAL PERSONNEL FILE COPY HUMAN RESOURCES SPECIALIST/MANAGER

SCDC Form 16-90
Instructions on Back (Rev December 1997)

OMG

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND	)	COURT OF COMMON PLEAS 2004-CP-40-1761
James Cal Bell et al Plaintiffs/Petitioners, vs Palmetto Unified School District No 1 and SCDC Defendants/Respondents	)	TRANSCRIPT OF RECORD (Motions)

December 11, 2006
Columbia, South Carolina

BEFORE

THE HONORABLE G THOMAS COOPER, JR JUDGE

APPEARANCES

W ALLEN NICKLES, III, ATTORNEY AT LAW
DONA LEA GUFFEY ATTORNEY AT LAW
Attorneys for the Plaintiffs/Petitioners

LAKE E SUMMERS, ATTORNEY AT LAW
Attorney for the Defendants/Respondents

JENNY H WILLIAMS
Official Circuit Court Reporter
(803) 576-1743

Monday, December 11, 2006

MR SUMMERS Good afternoon, Your Honor

THE COURT Good afternoon Let me get your appearances for the record, please

MR NICKLES Al Nickles and Donna Guffey We're for the Plaintiffs/Petitioners, Your Honor

MR SUMMERS And I am Lake Summers for the Defendants/Respondents, Your Honor And I have a copy of the memo in opposition I'm not sure if the Court has the file copy I got it filed this morning, but out of an abundance of caution I believe you have Mr Nickles' there And in the event you all don't have mine, here is an extra copy

THE COURT Well if it was filed this morning we don't have a copy of it I can assure you of that

MR SUMMERS Yes, sir

MR NICKLES And, Your Honor, we had emailed to you a Proposed Order and disk We have a case to go with that as well

THE COURT Thank you

MR NICKLES And I have a couple of items I'd like to share with you as part of our argument this afternoon It's supposedly the same I have one for you and your clerk

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(Document handed to the Court)

THE COURT All right Mr Nickles, if my memory serves me, I've been in this case

MR NICKLES You have, Your Honor It's deja vu all over again

THE COURT. Well, it's probably different issues

MR NICKLES Well, remarkably, not so different, Your Honor If it pleases --

THE COURT That was a discovery issue, if I recall

MR NICKLES And this is essentially a discovery case Your Honor Just to refresh ourselves, this action was brought initially by way of grievance from a number of former employees of the South Carolina Department of Corrections They requested an opportunity to be heard both at the Departmental level and at the State Employee Grievance Committee level and they were denied at both opportunities

We then filed an appeal and a petition for review which you heard on a motion for discovery That motion for discovery was necessary because we were attempting to establish, Your Honor, that we have the right to be heard at the State Grievance

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Committee level Because what the law says is if there are any material issues of fact relating to a reduction in force, then those who are adversely affected are entitled to have a review

And, Your Honor, I have brought with me this morning shared with you and with Mr Summers the particular code section which is in issue

THE COURT Didn't I agree with you on that?

MR NICKLES You did And after I would say an inordinate amount of wrangling, and we had a couple of lawyers change hands we finally got what we thought was out there And that's what we're going to talk about today

The statute that's involved, and it's all in the South Carolina State Employee Grievance Act, is 8-17-330 And it says simply that a reduction in force is an adverse employment action and considered as a grievance only if the agency or the State Human Affairs State Resources director determines a material issue of fact exists

And there are several cases that talk about what is the standard when you've got an agency and the Human Resources director saying there are no material facts I've brought two of those to your attention These are really the ones that are central to our

case

The first one is Dimian vs South Carolina State Human Health and Services Finance Commission And in Dimian, this is a gentleman who was reclassified And he said his reclassification although is grievable only if there's a material issue of fact He didn't get a hearing He claimed it was punitive He claimed that there were ulterior motives for his reclassification

The same standard as we have here on reduction in force You'll see the language is exactly the same And the Human Resources director denied it It came up to review on the -- in front of the -- let's see who heard this It was in this court Judge Burnett actually was sitting in Circuit Court here at the time Judge Burnett said, well, wait a minute, there are issues of fact here, and I have to remand this back to the State Grievance Committee

Well the Health and Human Services Finance Commission wasn't very happy with that They appealed it to the Court of Appeals The Court of Appeals says you're absolutely right The question is not do you prevail based upon what you assert The question is, have you brought forward a question of fact which you have an entitlement to have a

hearing about And the Court of Appeals said, yes, that's the standard It's not that you convince the trial judge that you should prevail on the merits Do you show the trial judge there are issues of fact worthy of consideration at a hearing Well, a year later --

THE COURT This hearing would be in front of the --

MR NICKLES The State Grievance Committee Yes sir A year later a Mr Wise brought a similar claim against the State Tax Commission, the same standard of review, the same type of issue He claimed that he was removed from his position for punitive reasons The agency said, no, it's just a reclassification We're not after you personally It's just a reclassification

Well he brought this issue up This one was heard Judge Patterson was sitting in Richland County at that time Judge Patterson said yeah, there are issues of fact here You're entitled to a hearing That goes to the South Carolina Supreme Court Justice Toal writing for a unanimous panel says, absolutely right If there is an allegation that a reclassification is punitive and where there's any evidence to support such an allegation, then

SCDC
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there's entitlement to a hearing Essentially, a pretext standard

And I think what all that means is this, Your Honor Today if we can show you in these records that there are any material issues of fact relating to the propriety of this reduction in force then we re entitled to a hearing essentially that Mr Summers has to win on a summary judgment standard He has to show that there are no material issues of fact in order for there not to be a hearing

And that only makes sense because, as you know, Your Honor Article 1 Section 22 of the Constitution says that an administrative officer such as a Human Resources director can't make a decision which is filed Those decisions have to be subject to judicial review

And the responsibility of this Court is to look at the records, which we have been able to after a lot of torture and turmoil put together to show you that there are questions of fact to be addressed to that Committee

And Your Honor, I want to just go through -- we have tried to enumerate these both in our Memorandum in Support and our Proposed Order, but I do want to sort of clear the air about what we're talking about

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here

Each of these Plaintiffs/Petitioners were certified teachers employed by the Department of Corrections in the Palmetto Unified School District Now, the Department would say that's a redundancy The Department would say these folks are employees of the Department It doesn't matter that they happened to work within the Palmetto Unified School District

And that essentially is the thrust of the Department's position in this case We can do anything to them we want to because they're our employees and it doesn't matter that the General Assembly has set up this unified school district It doesn't matter the General Assembly has set up this board It doesn't matter that there is a superintendent who has to administer this district None of that matters because we can essentially ignore all that because what the law says is that the board and the superintendent and the school district shall operate within the Department and with the consent of the director

Well, when we looked into this, we were pretty curious about what type of consent this director sought And the answer was zero He didn't involve the superintendent He didn't involve the board one

iota in bringing this reduction in force within this Department

And I think there is a difference, Your Honor, between ignoring someone entirely and taking their input and saying, I respectfully disagree There was no respectful disagreement here What this director did was just ignored the niceties of the law ignored this board, ignored the superintendent

Now, his testimony is to the contrary But we have the board records which show that he was never there We have --

THE COURT What is his testimony?

MR NICKLES His testimony is, yeah I sought the input of the superintendent The superintendent says I don't remember that And in fact the superintendent, there is a rather --

THE COURT Who is the superintendent?

MR NICKLES His name is Blanton, Wendell Blanton And portions of his deposition are in our exhibits, Your Honor I thought it was kind of curious that we looked at all the records that were provided to us from the Department, and they sent us finally some records showing the minutes of the board meetings Mr Ozmint was noticeable by his absence from these things He is their executive director

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THE COURT Which board? Which board?

MR NICKLES The board of the Palmetto Unified School District See what we have --

THE COURT There's not a --

MR NICKLES It's a legislatively established board

THE COURT I know It's not a board of the Department of Corrections?

MR NICKLES It is not It's established independently of the board Of course the Department of Corrections now is a cabinet industry They used to have a board that ran them, but that's long past So when I use the word "board" I mean the board of Palmetto Unified School District

The records from the superintendent to the board show for example that he says well, you guys may have read about this reduction in force in the newspaper I'm going to try to tell you a little bit about it at our next meeting No involvement in advance by this board in the selection of those to be reclassified or reduced or affected by a reduction in force

So we think that let's look at that as a peculiarity, something that needs some explanation That's one element of this case

Now are there any other peculiarities? Yes Some striking ones What is the announced reason for this reduction in force was Money saving, and I'm going to do this from the executive's words to paraphrase the executive, from the top down I'm going to do headquarters and I'm going to try keep away from the folks out in the field folks delivering the services

What in fact happened is the director used a rather loyal connotation of the word "headquarters" He used it to subsume the entire education department So we have 140 something people lose their jobs as a result of this reduction in force 87 of them were teachers vastly disproportional to --

THE COURT How big is the district? I mean what's the population of the district?

MR NICKLES Well, the district used to be -- used to have schools in I think 21 facilities

THE COURT Institutions

MR NICKLES Now I think it's down to like 10 or 12 Is that right, Lake?

MR SUMMERS That's correct, sir

MR NICKLES Something like that I mean they cut it considerably And so we saw that there was a

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disproportionate number of educators selected for this in comparison to the population in general And that was a curiosity

We then have the situation in which we kept looking, Your Honor, and we came to you initially for help in getting records from the Department And they were very slow getting them to us In fact I have to thank Mr Summers He's the first lawyer that's really produced any records for us We got them only this summer, ironically. And we thought that there was going to be something in those records Because I've been working, suing and representing the government for a long time and I know they keep records

And we finally got the records And we asked a very simple question And that is why don't you show us what happened with these positions that you eliminated? Tell us what happened after the reduction in force And we never got it, never got it

Finally we took the deposition of the Human Resource director for the Department And I asked him the question Can you produce that? He said oh, yeah, we can get that to you And we got it And that is our Exhibit R I believe And this looks

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just like, if you get it look at it without any history, it's just a list of names But the question is to tell us what have been the hirings in the Department following reduction in force

THE COURT This is the rift list?

MR NICKLES No that's not the rift list That's the replacement list The replacement list is important because of this, Your Honor What that shows is there were 87 education positions eliminated Guess how many were replaced? 78 Okay And guess what? They didn't call them education positions any more They called them unclassified positions

THE COURT So everything unclassified on here is to what you refer --

MR NICKLES If you look at it, it will say two things You'll see where it says unclassified --

THE COURT Mm-hmm (affirmative)

MR NICKLES -- classroom teacher You look down, it says Frank Box, for example

THE COURT Right

MR. NICKLES Frank Box went from a certified classroom teacher to unclassified classroom teacher That means that that was a rift And what they did was they just changed the name of the position

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Okay?

THE COURT: So these were not all terminations?

MR NICKLES Well they were terminated These people these individuals were terminated Mr Box happened to be one of the lucky ones that didn't get riffed But of the 87 people that were the educators, only four came back in so-called education positions

What they did was they hired folks at lower rates of pay temporary and probationary employees to replace our clients Now that ain't a rift, Your Honor And that's what this record shows It was all smoke and mirrors What they did was -- and Mr Ozmint, to give him credit, was very candid about this I said, how did you select the folks for reduction in force? And bless his heart, he said I wanted the most bang for the buck

So what he did was these educators, these certified people who were providing services to the inmates were let go, and they hired cheaper people to come in and do the job We'll be able to show that to the satisfaction of the Grievance Committee, Your Honor And that's going to be the end of the lawsuit

Now, there are other things that we allege and

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other things that we have --

THE COURT Well, that's not the end How would that be the end of the lawsuit?

MR NICKLES Well, I think because they're going to find that these people were not properly rifted, that they're entitled to reinstatement to their former positions with back pay But that's something that that State Committee has to do That's something I can't ask you to do But I wish that I could because I think the record is overwhelming

Your Honor, there are other things anecdotally that we brought to the Court's attention There was a situation involving a Mr Randolph And Mr Randolph had a conversation with Mr Ozmint back in April of 2003 And it was so important to him that he wrote it down Of course in preparing for this argument we showed Mr Randolph his written statement and prepared an affidavit for him to sign We have that affidavit presented to you

The Department would say you should question the credibility of that because the affidavit is after the fact Well, the fact of the matter is the Department never asked us for any discovery in this case They weren't interested in what our clients

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had to say And when we prepared this affidavit I mean if they had wanted to see a document, we would have been happy to give it to them They just never served us with any discovery

And as you know, Your Honor, as Judge Toal has said and as the Court of Appeals has said those questions of credibility and weight are for the State Employee Grievance Committee and not for this court But we submit that Mr Randolph would be a very credible witness

And what he will tell the State Grievance Committee is he happened to have a conversation with the director at the time that this was going on and suggested to the director that he ought to try to use attrition try to use other means rather than decimating the staff of the Palmetto Unified School District And the director volunteered, well, you guys have sued the Department for more money back in 2001, and that was wrong

THE COURT Where is that affidavit?

MR NICKLES That is at Section S Tab S of our presentation

Now, we submit to you, Your Honor, that we have multiple examples of inconsistencies, of sort of I guess just blatant refusal to observe the niceties of

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the law here And an example is, these folks are entitled to recall after their rift If you look at this list that we've given you in Subsection R, any of those folks could have been recalled or called into these positions They didn't even offer them the opportunity to work in their old jobs at a reduced rate in pay, didn't offer them that They went out and hired other less-experienced people to do that

When they were offered positions, they were offered correctional officer positions And we have an affidavit in our materials here that the person who was offered a correctional officer position guess what duty she was assigned? To teach So being paid as a correctional officer but to teach

THE COURT· Sounds like a high school coach

MR NICKLES Well I wish they were being paid like a high school coach Your Honor, the other thing that I spoke with Mr Near about -- he's the Human Resource director from the Department of Corrections -- is, what do you typically do when you perform a reduction in force? And they had one to sort of give us a template of how you do these things They had one a couple of years earlier

THE COURT Who was that?

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MR NICKLES Mr Near N-E-A-R

THE COURT I know But what is his position?

MR NICKLES He is the Human Resource director for the Department of Corrections And excepts of his deposition are in our materials as well And --

THE COURT You didn't ask him with reference to the School District, did you?

MR NICKLES Well, this is what I asked him

THE COURT. You're just talking about in general

MR NICKLES No. I asked him about the Department of Corrections I asked him about the Department of Corrections, Your Honor And I said you had one of these reductions in force a couple of years ago Yes And isn't it true at that time that the first thing you did was to eliminate temporary and at-will employees so you don't get to the folks who are your better employees? He says, that's the normal way to do it And if the records show that, which they did, that's the way we did it

Well, guess what they did here, Your Honor? He admits this They turned the process on its head They retained the temporary people They call them pink slips They protected them from being eliminated from work They retained the grant

employees who are at-will And they eliminated the long-term, permanent state employee school teachers certified teachers

And, Your Honor, if you look at just general Human Resources management activity that is absolutely upside-down Absolutely Because what you do is, a reduction in force -- and this is in their policy -- is a last resort

THE COURT Is this an equal protection argument?

MR NICKLES Well, this isn't equal protection No, sir No, sir This is pure and simple violation of procedure

THE COURT No When you're comparing the reduction in force of correctional officers to the reduction in force of teachers

MR NICKLES No They didn't eliminate any correctional officers They didn't do that And I'm not begrudging them that I don't think that they -- I really don't think that they had grounds for the reduction in force to begin But that's not my call We're not making this argument on the basis that they didn't need to save money We'll accept as legitimate their need to save money They just didn't do it right, Your Honor And the people they

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stepped on were my clients They could have done it very easily other ways

Now, Mr Summers is going to tell you that the Gospel according to Nickles is really irrelevant on this And I have to agree with him I mean I'm not the executive director of the Department of Corrections But I do know the law and I do know the way that this reduction in force was set up and I do know what people were told

And people were told that it was going to be a last resort, we're only doing this because we have to And then when you got the records it shows that they didn't have to that they kept people they didn't have to keep they protected people We've got this in our materials They moved folks around to protect people from reduction in force

And, Your Honor, it's just a mess the way that this Department did this, because they had one end in mind, and that is, we're going to cut the highest paid teachers out of this The easiest way to do this is set up these 11 little circles where they can't compete against one another

And that's -- just to remind you, this is a state unified district The Department had set up I think 11 geographic areas for competitive purposes

And they say they did that so folks wouldn't have to drive too far or move too far away if they wanted to take people's jobs from them bump into other jobs

Well, unfortunately, what happened in this case, and you'll see it in the records, in creating those 11 geographic units, they absolutely eliminated education facilities in several of those areas So that even if I had 20 years with the Department and somebody over here 25, 30 miles away had two years with the Department I couldn't compete with them for reduction in force Thus, the bang for the buck

So, Your Honor, we contend in this matter for the reasons set forth in our brief for the reasons set forth in our Proposed Order, for the reasons appearing in the appendices to our brief that there are multiple issues of fact to be addressed by the State employee Grievance Committee that the appropriate action for this Court to take is to remand this, as was done in the Dimian case, as was done in the Wise case, and let the parties bring their facts to the Committee and let the Committee make its judgment on whether those facts are convincing or are not convincing

But the facts are there the disputes are there, the irregularities are there we believe in a manner

that overwhelmingly supports our claims And we believe that if given the opportunity to present this to the State Committee they will agree that our clients have been victimized in this situation and they're entitled to relief

THE COURT The relief you seek is to remand to the --

MR NICKLES Exactly We want to be heard, Your Honor We want to be heard on the merits

THE COURT Well posturally, this was a --

MR NICKLES It's a petition for a judicial review and complaint The petition for judicial review is for remand to the Grievance Committee The complaint is a declaration that there have been violations If we get the remand, we don't need to reach that issue of the complaint

THE COURT All right Mr Summers

MR SUMMERS Yes, sir Again, my name is Lake Summers Forgive my speaking voice I have a touch of a head cold, sinus infection

THE COURT I can hear you just fine

MR SUMMERS I appreciate it very much, sir First and foremost, in listening to what Mr Nickles argued to the Court and in reading what Mr Nickles and Ms. Guffey presented to the Court by way of their

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memorandum of law, the theme that struck me was something I learned when I was in Iraq in the desert a phrase we would use frequently which would be the Paul Harvey, "The rest of the story" Obviously my task today is to present to you SCDC's side of this which we would submit to you is the rest of the story

Among all of the documents and all of the argument that Mr Nickles and Ms Guffey have either articulated to the Court today or presented to the Court in writing, one statute that they omitted any reference to is Section 24-25-90 And it's in the rather rough-shod but hopefully at least pleasantly appearing appendices that I presented with my written materials Your Honor It appears in Appendix B It's page 12 labeled page 12 of 12 in the top right-hand corner of Appendix B And I'll read it into the record with the Court's indulgence

"The superintendent of the district, that being Palmetto Unified School District No 1 and all other educational personnel shall be employed, supervised and terminated according to the South Carolina Department of Corrections' personnel policies and procedures "

Now, certainly I have a great deal of respect

for both Mr Nickles and Ms Guffey I would never say anything that Mr Nickles has argued to the Court or offered to the Court right here is irrelevant But ultimately, counsel's view of what's right and wrong, counsel's view of the law isn't what is dispositive, very respectfully What we submit is determinative, what we submit is dispositive is the statutes in play and the relevant precedent

Time and again Mr Nickles talked about what wasn't his call failure to observe niceties of the law, that we didn't do it right But with a rare exception Mr Nickles didn't say that we violated the law in doing so

Ultimately, as director Ozmint testified at his deposition -- and I've included extracts of his deposition testimony that obviously present our perspective on it -- there was a legitimate reason for this reduction in force Mr Nickles may quibble with it Ms Guffey may quibble with it Some of the Petitioners who are here in the courtroom may quibble with it or argue with it vehemently

And as an aside, Your Honor, we more than understand the passions that are involved We more than understand the stakes that are involved We have folks' livelihoods involved We have folks'

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careers involved We have folks' tenure at the Department of Corrections involved in this matter So it's not that we have ignored anything at all

But Director Ozmint, as he articulated in his deposition testimony, when he took office back in 2003, had he testified that he recognized there was a budget crisis And Director Ozmint's deposition testimony for the record, Your Honor, appears in one of the appendices that I have I believe it is Appendix D And certainly the Court and the Court's clerk can review that as you see fit

Director Ozmint recognized this budget crisis and made an executive decision He is tasked with doing that And the decision he made was we're going to have a reduction in force We're going to have to unfortunately cut costs We're going to have to unfortunately lose employees to achieve that end And he as the executive director of the agency identified, as he is permitted to do, what requirements there would be

And ultimately, that's why we look to the particular statute to which I refer to the Court's attention, 24-25-90 As an aside, Your Honor, the remainder of those statutes simply stand for the proposition from our perspective, from SCDC's

perspective, that the Palmetto Unified School District is a Department of SCDC Mr Nickles would perhaps like the Court to consider the school district as a separate entity deserving of special consideration As you heard Mr Nickles say however more than just educators and administrators were subject to the reduction in force in 2003 140 or so people were subject to this reduction in force, and, yes, 87 of them were educators

But Mr Nickles acknowledged Director Ozmint's candor And Director Ozmint determined that if we're going to lose people, if I have to make this decision, I'm going to preserve what I consider to be methods to achieve our core mission And that's Director Ozmint's call

And the core mission he identified was keeping the inmates in custody keeping them in custody safely To the extent that became his driving force, he then focused on headquarters staff And educators became part of that decision process only because of their association in the headquarters staff area Again, --

THE COURT Headquarters of what?

MR SUMMERS Headquarters of SCDC Your Honor, as opposed to any other department, as opposed to

correctional officers, as opposed to administrators

THE COURT Not of the headquarters of the Palmetto Unified School District?

MR SUMMERS Well, sir, if I have confused the Court I'm sorry We consider Palmetto Unified School District and its staff and its employees to be part of SCDC And they are considered to be part of the headquarters

THE COURT And how do you come to that conclusion?

MR SUMMERS By our interpretation of 24-25-90 which says --

THE COURT Well how does that comport or compare with 24-25-10?

MR SUMMERS Ultimately we would submit that 24-25-10 is simply the nomenclature, what are we going to call this entity that the Legislature has established

THE COURT. Established a special statewide unified school district

MR SUMMERS Yes, sir Within the Department of Corrections We look at the within the Department of Corrections in tandem with the provisions that I've read to you from 24-25-90.

THE COURT So then if that's true, then

24-25-30 --

MR SUMMERS Yes, sir

THE COURT -- 24-25-35, 24-25-40 25-25-50, 24-25-55, et cetera, et cetera, et cetera have no meaning

MR SUMMERS No, sir I would not submit that to the Court Ultimately --

THE COURT Well wait a minute now Let's don't -- you say that the director is subject to the -- I mean, sorry -- that the Unified School District is subject to the direction of the director of the Department of Corrections So, why set up all this other elaborate structure by the Legislature if in fact all you really have to do is go to the Department of Corrections, the director of the Department of Corrections? It doesn't make -- I mean, to me, you've got a disconnect there or a clash of conflict between these two statutes

MR SUMMERS I would not characterize it I understand the Court's tension with that I would simply state that the statutes in that section were passed by the Legislature to give some skeleton, some structure if you will, to the entity that they created through the Legislature But they --

THE COURT It doesn't say that The purpose

section doesn't say that

MR SUMMERS I understand that, Your Honor

THE COURT The purpose says to enhance the quality and scope of education for inmates

MR SUMMERS Correct

THE COURT It doesn t say it's to do what the director says it should do

MR SUMMERS But the last statute of the section says that they are to be employed, supervised and terminated pursuant to the Department of Corrections' policies and procedures So you have a method of stove piping, if you will, for lack of a better term, this entity under SCDC's executive structure That's what we would submit as a way to rationalize or to read these statutes so that they harmonize with one another

But again, Your Honor, there is the contention from the Petitioners that by virtue of a lawsuit in which they were the participants, the Abraham suit, Mr Nickles described a conversation between Petitioner Randolph and Director Ozmint And allegedly Petitioner Randolph recalls a conversation where Director Ozmint in the context of discussing possible reductions throughout SCDC, Petitioner Randolph said, can't we get where you want to go

through attrition, that type of thing And allegedly Director Ozmint responded by saying, well, --

THE COURT You shouldn't have sued us

MR SUMMERS Correct

THE COURT I think, without reading anything in, that was probably an offhand remark

MR SUMMERS Yes sir Certainly I have provided some case law If in fact it was said, which Director Ozmint disputed at deposition testimony, we have some case law that would indicate that you cannot infer retaliatory intent from such a stray offhanded remark But that case law is in my brief and I won't bore the Court with it

THE COURT I don't think that's the issue

MR SUMMERS. Well, I would respectfully submit it is part of the issue as the Petitioners see it And certainly Mr Nickles and Ms Guffey could speak to it and already have It's part of the issue of this retaliatory conduct

I think with some degree of insistence they have indicated that they view the rift as it was structured and the rift as they perceive it to be targeted towards educators as retaliation for the suit

THE COURT Is that a question of fact?

MR SUMMERS No, sir Ultimately I don't think that -- I certainly think they would like it to be considered so

THE COURT Well, what is it then?

MR SUMMERS I would certainly think it to be --

THE COURT The question is what were Mr Ozmint's motives in creating the rift? Was it retaliatory or was it truly due to a reduction in budget and security concerns, et cetera, et cetera, all of the things he has to worry about?

MR SUMMERS I understand We would submit Your Honor, again we talked about the offhanded remark, we have case law in our brief talking about whether or not a stray remark may be true evidence of retaliatory motive We consider the breadth of evidence that's before us as Director Ozmint indicated it was in his deposition testimony which was the budget crisis he assessed when he first took office and the need to eliminate positions and therefore save money, and this is the means he used to do so And he did without question during the deposition talk about achieving a bigger bang for the buck And there is analysis in the brief talking about doing that

What we submit is that while the methods he used certainly may be perceived by the Petitioners as violative of the law and unfair we don't feel that they were That's the bottom line, Your Honor Certainly Mr Nickles and Ms Guffey have perspective Certainly the Petitioners have their own speculative But when we view the entire statute the way we interpret it, the way we feel it should be reasonably interpreted, that the methods that were used to achieve the end that was desired, and ultimately I think Director Ozmint in his deposition talked about how he did not want to do the rift, that there was going to be pain associated with this move, but he had to figure out a way to do it And it was his purview to do so

THE COURT That's the question

MR SUMMERS Yes sir

THE COURT Whether it was or was not his purview to do it the way he did it in my mind

MR SUMMERS Yes, sir I understand And we would submit has the evidence --

THE COURT Regardless of the fallout

MR SUMMERS Yes, sir And not to minimize the fallout for these folks at all I think Director Ozmint has minimized it, at least in his own mind at

SCDC
0318

deposition testimony, the fallout

But we would submit that the breadth of the evidence that has been collected and submitted to the Court to date does not show, number one any kind of retaliatory intent, and, number two, that as a matter of law this Court should determine that there are no material issues of fact by which is this Court should remand this matter back to the State Employee Grievance Committee for hearing

THE COURT. Should this Court grant the Petitioners' -- or the petition -- is it likely the Department would appeal that Order?

MR SUMMERS Candidly Judge I would have to ask my client that

THE COURT. Because that's probably where this thing should be

MR SUMMERS I can certainly tell you that there would be a strong consideration of doing so yes sir But a final answer I cannot give the Court

THE COURT. Mr Nickles

MR NICKLES Yes, sir Just briefly in reply

THE COURT Am I on the wrong track here about the clash between these two statutes, or do you --

MR NICKLES No

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THE COURT Or am I way out in left field?

MR NICKLES When I have had to deal with statutes in this action they have to be read in pari materia, together And that's a lesson I learned a long time ago in addressing statutory construction issues

I had that same type of thing raised in the litigation we represented the state retirement system on when it was under attack for allegedly withholding retirement benefits And we said that the Legislature has to be believed to know what it's doing, to know what its other statutes say when it adopts legislation It doesn't ignore itself Whether you believe their statutes are wise or at folly, they are to be read together

And what we have here is a Department wanting to read one provision of the statute in isolation, when if you look at the title in its totality, it does say that this is a special statewide school district It does go to great length setting up an independent board

And if you look at Section 24-24-40, what does the first sentence say? It says the Palmetto Unified School District No 1 shall be under the control and management of a board of nine trustees who shall

operate the district under the supervision of the South Carolina Department of Corrections

And to ignore that language by saying that well the Department director can fire these folks if he wishes is to ignore the thrust of the legislation in its totality

It goes and says how these board members shall be selected Four of them the Department director has the opportunity to select I mean they can be his voice on the board Others are going to be appointed by the State Department of Education, the superintendent and by the Governor

So it's an insult to the General Assembly to the Governor and to the State Superintendent of Education to say that we don't care what these folks have to say We don't have to consult with them We don't even have to tell them what we're going to do They could find out about it after the fact and either like it or lump it And that's essentially the argument that the Department takes

THE COURT Well, then what do you think 24-25-90 means?

MR NICKLES I think it means no more than what it says, Your Honor and that is, that when you're talking about the superintendent and the employees,

they are employed by the state Exactly

THE COURT Who writes it?

MR NICKLES The state of South Carolina

THE COURT What name is on their paycheck?

MR NICKLES State of South Carolina Comptroller General

THE COURT Not the Department of Corrections?

MR NICKLES No sir The Comptroller General writes their checks just like it does every other state employee

And Your Honor, when I'm looking at this reduction in force -- and I have a great deal of respect for Mr Summers and his abilities to try to represent his client here -- we look for deviations from the norm when we're trying to establish some pretext

And the deviations from the norm here are multiple We've got the executive director admitting that they didn't go in and look at the temporary, probationary grant employees first Didn't do that That's a deviation from the norm

We've got the situation in which the board are not consulted at all And the superintendent, if you read our materials, actually writes protests to the director saying, are you sure you want to do it this

SCDC 0322

way, because the people you're planning to get rid of we have alternative sources of finance for We have the Education Finance Act that pays us independent of our appropriations We have federal aid that's paid to us independent of our appropriations You're cutting off your own hand by doing this is what the state superintendent is saying

And the executive director ignores that advice and goes forward And what does he do? Another deviation Rather than when they so-call get rid of these positions they evaporate into vapor, they are recreated They are reborn as unclassified positions, which he brings lower paying employees in to do the very same job

And that's really what we discovered after you ordered the Department to open its books to us We thought that's what had happened, but not until we got those documents did we see it to be true

And, Your Honor, a reduction in force is not targeted to individuals because they make a lot of money It's elimination of a position And that's not what happened here, and we're going to be able to demonstrate that to the State Employee Grievance Committee if given the opportunity

THE COURT All right Anything further?

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MR SUMMERS Just very briefly, Your Honor Ultimately, we heard Mr Nickles again on rebuttal talking about deviation from the norm I simply respectfully submit to the Court that SCDC's position is that we haven't heard any kind of characterization that we deviated from the law Ultimately --

THE COURT I'm not sure you deviated from the norm unless you can show me that somehow the Unified School District had been subject to a reduction in force in the past

MR SUMMERS I think that's a valid observation Your Honor Again, there is the Abraham case that I talked about Within that opinion our Court of Appeals said -- I highlighted this in my brief and I'll quote very briefly -- "The District, meaning the Palmetto Unified School District No 1, as part of the Department of Corrections clearly has no tax base from which to generate revenue "

Now, ultimately I think that goes to the theme I was striking earlier which is this is not a separate entity, that these educators are employees of the state and more specifically employees of the Department of Corrections And that's why we feel that 24-25-90 comes into play in our interpretation of the statute Thank you very much, Your Honor

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
FEB 1 2 2007
SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G Thomas Cooper, Jr Circuit Court Judge

Trial Court Case No 04-CP-40-1761

South Carolina Department of Corrections, Appellant,

v

James "Cal" Bell, Othella Bernard Katherina Bowyer, Linda M W Bratton, Ann T Bridges Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones Geneva M Martin Mary H McCabe Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams, and Paula Woodlief Respondent

NOTICE OF APPEAL

The South Carolina Department of Corrections ["SCDC"] appeals the order of the Honorable G Thomas Cooper, Jr, dated January 8, 2007 and file stamped January 10 2007 Appellant SCDC received written notice of entry of this order on January 12, 2007

February 12, 2007

Lake E Summers
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Columbia, South Carolina 29201
(803) 254-3300
Attorney for Appellant

Other Counsel of Record
W Allen Nickles, III, Esquire
Dona L Guffey, Esquire
Gergel, Nickles & Solomon, P.A
1519 Richland Street
Columbia, South Carolina 29201
Attorneys for Respondents

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	
	C/A NO 04-CP-40-1761
James "Cal" Bell, Othella Bernard,)	
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B. Croxton, Bernetha L. Culbreath,)	
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Jones, Geneva M. Martin, Mary H.)	
McCabe, Beverly McClanahan, Max)	
D. Randolph, Carolyn McIver Smith,)	
Maggie G. Williams and Paula Woodlief,)	
)	
Plaintiffs,)	
)	ORDER
vs)	
)	
South Carolina Department of)	
Corrections and Palmetto Unified)	
School District No 1,)	
)	
Defendants.)	

2004 JUN 10 AM 11 16
CCC & GS

PROCEDURAL HISTORY

Plaintiffs are certified educators formerly employed in full-time instructional or administrative positions in the Palmetto Unified School District ("District") This school district was created by statute to serve inmates in the South Carolina Department of Corrections ("SCDC" or "Department "). S C. Code § 24-25-10, et seq Plaintiffs were each removed from their positions as the result of a reduction in force implemented effective June 1, 2003 Plaintiffs exhausted all administrative remedies afforded to them and seek judicial review for reinstatement to their former positions of employment.

Plaintiffs filed a Petition for Judicial Review and Complaint on April 6, 2004 By this Petition Plaintiffs seek an order remanding their grievance appeals to the Office of Human

Resources ("OHR") to be heard by the South Carolina State Employees Grievance Committee pursuant to S C Code Annotated § 1-23-380(A)(6). Plaintiffs filed a Motion for Discovery on November 19, 2004 In an Order dated May 2 2005 this Court granted Plaintiffs' motion as to all requested interrogatory responses requests for production of documents, and depositions Defendant s Motion for Reconsideration was denied on September 8, 2005

LEGAL ANALYSIS

An employee has a right of appeal from the final decision of an agency employee grievance procedure to the State Human Resources Director S C Code Ann. § 8-17-330 Under this section (titled Agency employee grievance plans, procedures; appeals), an employee may file a grievance or an appeal concerning an adverse employment action, such as termination. This section states that "a reduction in force is an adverse employment action considered as a grievance only if the agency or as an appeal only if the State Human Resources Director, determines that there is a material issue of fact that the agency inconsistently or improperly applied its reduction in force policy or plan " Id The State Human Resources Director then forwards only those employee appeals regarding reductions in force to the State Employee Grievance Committee which have been determined to (1) have a material issue of fact regarding inconsistent or improper application of the agency's reduction in force plan or policy, and (2) meet the jurisdictional requirements S C Code Ann § 8-17-340

In this case, the Plaintiffs never received a hearing before the Grievance Committee because the State Human Resources Director determined their complaint was not grievable This is a final decision from which Plaintiffs can appeal Demian v South Carolina Health and Human Services Finance Com'n, 297 S C 1 374 S E 2d 510 (Ct.App 1988). An appeal to the

circuit court from a final decision of the State Human Resources Director determining that an appeal is not grievable is governed by the Administrative Procedures Act under S C. Code Ann. § 1-23-310 through 400 Code of Laws of South Carolina, 1976 as amended Id

Under the Administrative Procedures Act, a party who has exhausted all administration remedies within the agency and who is aggrieved by a final decision in a contested case is entitled to judicial review under this article. S C Code Ann § 1-23-380 The court may affirm the decision of the agency or remand the case for further proceedings S C Code Ann § 1-23-380(A)(6) The ultimate question faced by the Court is, whether are not, there is a material issue of fact that the Department of Corrections inconsistently or improperly applied its reduction in force policy or plan

This Court finds there is sufficient evidence that a material issue of fact exists in the Department of Corrections implementation of its June 1, 2003 reduction in force plan Specifically, the Plaintiffs have raised several concerns that present material issues of fact such as

1 the South Carolina Department of Correction's division of unified school district,

2 the lack of participation by the School District and its Board of Trustees in the process;

3 the fact that of the 148 positions eliminated in the reduction in force, 84 were from the Division of Education,

4 the assertion that Plaintiffs' selection for reduction in force was in retaliation for enforcing their right to be paid in compliance with state law under a separate law suit, and

Ex. 2 & 3

5 the fact that the Department of Corrections retained probationary employees, grant employees and "pink slip" temporary employees in favor of educators, which is in contrary to the Department's procedure used in the 2001 reduction in force, where at-will employees were eliminated and those positions where filled by permanent employees.

CONCLUSION

For the reasons stated above, there exist disputed issues of material fact which entitle Plaintiffs to a hearing before the State Employee Grievance Committee Therefore, Plaintiffs request for remand is GRANTED, and the Office of Human Resources is directed to reinstate the grievance for a hearing before the State Employee Grievance Committee

AND IT IS SO ORDERED

G Thomas Cooper Jr.
Judge, Fifth Judicial Circuit

Columbia, South Carolina
January 8 2007

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND
IN THE COURT OF COMMON PLEAS

James C. Bell et al.

PLAINTIFF(S)

JUDGMENT IN A CIVIL CASE

CASE NO 04-CP-40-1761

SC Dept of Corr et al

DEFENDANT(S)

2007 JAN 10 AM 11 16
RICHLAND CO. S.C.
CLERK OF COURT
CCC
G. SCOTT

CHECK ONE

[ ] **JURY VERDICT** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered

[ ] **DECISION BY THE COURT** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered

[ ] **ACTION DISMISSED** (*CHECK REASON*) [ ] Rule 12(b), SCRCP [ ] Rule 41(a) SCRCP (Vol Nonsuit) [ ] Rule 43(k), SCRCP (Settled) [ ] Other _____

[ ] **ACTION STRICKEN** (*CHECK REASON*) [ ] Rule 40(j) SCRCP [ ] Bankruptcy [ ] Binding arbitration subject to right to restore to confirm, vacate or modify arbitration award [ ] Other _____

IT IS ORDERED AND ADJUDGED [X] See attached order. [ ] Statement of Judgment by the Court.

Dated at Cola South Carolina, this 10th day of Jan, 2007

PRESIDING JUDGE

This judgment was entered on the ___ day of _____ 20___ and a copy mailed first class this 10 day of Jan 2007 to attorneys of record or to parties (when appearing pro se) as follows

W Nickles
D. Gaffney

ATTORNEY(S) FOR THE PLAINTIFF(S)

S Justice
L. Simmons

ATTORNEY(S) FOR THE DEFENDANT(S)

G. SCOTT

CLERK OF COURT

SCRCP APP-24

SCRCP FORM 4 (Revised 5/00)

2363
SCDC
0330

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G Thomas Cooper, Jr , Circuit Court Judge

Trial Court Case No 04-CP-40-1761

South Carolina Department of Corrections — Appellant,

v

James 'Cal Bell, Othella Bernard, Katherina Bowyer Linda M.W Bratton, Ann T Bridges Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath William K. Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph Carolyn McIver Smith Maggie G Williams and Paula Woodlief — Respondent.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on the above named Respondents by directing the hand delivery of a copy of it to the Respondents attorneys of record, W Allen Nickles, III, and Dona L Guffey, both of Gergel, Nickles & Solomon, P A 1519 Richland Street, Columbia, South Carolina 29201

February 12 2007

Blake E Summers
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Attorney for Appellant

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
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v

South Carolina Department of Corrections and Palmetto Unified School District No 1, Defendants,

Of whom South Carolina Department of Corrections is the Appellant.

AMENDED NOTICE OF APPEAL

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The Appellant files this Amended Notice of Appeal in accordance with instructions provided by the Clerk of Court in his letter dated February 15, 2007

February 20, 2007

Lake E Summers
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339 Heyward Street, Suite 200
Columbia, South Carolina 29201
(803) 254-3300
Attorney for Appellant

Other Counsel of Record
W Allen Nickles, III, Esquire
Dona L Guffey, Esquire
Gergel, Nickles & Solomon, P.A
1519 Richland Street
Columbia, South Carolina 29201
Attorneys for Respondents

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE FIFTH JUDICIAL CIRCUIT
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2003 JUN 10 PM 16

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AND IT IS SO ORDERED

G Thomas Cooper Jr.
Judge, Fifth Judicial Circuit

Columbia, South Carolina
January 8 2007

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND
IN THE COURT OF COMMON PLEAS

James C. Bell et al.

PLAINTIFF(S)

JUDGMENT IN A CIVIL CASE

CASE NO 04-CP-40-1761

SC Dept of Corr et al.

DEFENDANT(S)

RICHLAND D.C.(II), S.C.
2007 JAN 10 AM 11 16
BARBARA S. SCOTT
C.C.C.P. & G.S.

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IT IS ORDERED AND ADJUDGED [X] See attached order [ ] Statement of Judgment by the Court

Dated at Cola South Carolina, this 10th day of Jan 2007

PRESIDING JUDGE

This judgment was entered on the ___ day of _____ 20___ and a copy mailed first class this 10 day of Jan 2007 to attorneys of record or to parties (when appearing pro se) as follows

W Nickles
D. Gaffney

ATTORNEY(S) FOR THE PLAINTIFF(S)

S Justice
L. Simmons

ATTORNEY(S) FOR THE DEFENDANT(S)

s/BARBARA S SCOTT

CLERK OF COURT

SCRCP APP-24

SCRCP FORM 4 (Revised 9/00)

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G Thomas Cooper, Jr , Circuit Court Judge

Trial Court Case No 04-CP-40-1761

James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M.W Bratton, Ann T Bridges, Rance C Cobb Jeannie B Croxton Bernetha L Culbreath William K. Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams, and Paula Woodlief,

Respondents,

v

South Carolina Department of Corrections and Palmetto Unified School District No 1

Defendants

Of whom South Carolina Department of Corrections is the

Appellant.

PROOF OF SERVICE

I certify that I have served the Amended Notice of Appeal on the above named Respondents by directing the hand delivery of a copy of it to the Respondents' attorneys of record, W Allen Nickles III and Dona L Guffey, both of Gergel, Nickles & Solomon, P A 1519 Richland Street, Columbia, South Carolina 29201

February 20, 2007

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August 27, 2008



Terry M Baggott
State Budget and Control Board
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE Palmetto Unified School District RIF

Dear Terry

Enclosed please find our submissions for the upcoming hearing in the above-referenced matter We reserve our right to supplement this information to include affidavits, testimony and any other evidence prior to and during the hearing

Sincerely,

Dona L Guffey

DLG/pfb
cc Lake Summers, Esquire (w/enclosures)
Enclosures
File #03-156

INDEX

1 Grievance filed June 11, 2003,

2 South Carolina Court of Appeals' Order filed May 14, 2008,

3 Letter dated June 4, 2008, from Mr Terry M Baggott, State Office of Human Resources, to Mr W Allen Nickles and Ms Robin Gracien and Letter dated July 23, 2008, to Mr Sam L Wilkins, Director, State Office of Human Resources, from Mr W Allen Nickles,

4 South Carolina Code of Laws § 24-25-10, et seq., Palmetto School District Number 1,

5 Memorandum School Board Meeting scheduled for April 17, 2003, and Minutes of April 17, 2003, Palmetto Unified School District Number 1 Board Meeting,

6 Chart "SCDC Fillable Vacancies as of June 1, 2003,"

7 Chart "Positions Being Eliminated and Employees Eligible for Bumping in Each Competitive Area,"

8 Chart Employees Subject to RIF by Institution,

9 Discovery Response "Response to Question #3 - New Positions Created 7/2/03 to Present (FTE/TEMP/ TEMP Grant),"

10 Discovery Response "Response to Question #3B - Positions Reclassified With an Effective Date of 7/2/03 to Present,"

11 Discovery Response "Response to Question #4 - List of all Reclassifications, Promotions, Demotions, Reassignments and Transfers with Eff Date of 7/2/03 to Present,

12 Discovery Response "Response to Question #5 - FTE/TEMP/TEMP Grant Employees,"

13 Discovery Response "Response to Question #6 - List of All Employees Affected by RIF on June 1, 2003, Who had Their Salary Reinstated to the Same Level During the RIF Period of June 2, 2003, through June 1, 2004,"

14 Discovery Response "Response to Question #7 - List of all Employees Who Were Terminated by the RIF Process and Were Recalled or Rehired Since June 1, 2003,"

15 Institutions Greatly Reduced by RIF,

16 Chart "SCDC Frozen Vacancies"

17 Education Federal Funding Comparison,

18 SCDC Memorandum Budget Issues,

19 Palmetto Unified School District Five Year Expenditure Comparison,

20 SCDC Memorandum Education Funds,

21 SCDC Operation Expenditures Fiscal Years 2000-2005,

22 Retirement Opportunities for the Years 2003-2005,

23 Grievants' Initial Interrogatories and Requests for Production and SCDC's Responses,

24 Applicant James C Bell,

25 Applicant Larry Yarbrough,

26 Affidavit of James "Cal" Bell,

27 Deposition Excerpts of Superintendent Wendell Blanton, pp 5-6, 20-28, 40-41, 44-47,

28 Deposition Excerpts of Mr John Near, pp 6, 10-13, 16, 20, 22-28, 30-33, 35-40, 50-59, 67, 69-72, 77, 82-83, 85-88, 95,

29 Deposition Excerpts of Mr Jon Ozmint, pp 5, 12-14, 24, 27, 48-49,

30 Affidavit of Max Randolph,

31 Affidavit of Beverly McClanahan

S h Carolina Department of Corrections
Office of Workforce Relations

GRIEVANCE REPORT

TO Office of Workforce Relations

FROM James "Cal" Bell (Name) Educator (Title)

DATE 6/11/03 250 98 3702 (SS #)

Date of Hire 4/21/92 Perry (Work Location)

Work Telephone Number (864) 243 4700

Home Telephone Number (864) 456 3202

The subsequent grievance/appeal is submitted under the provisions of applicable SCDC policies/procedures

NATURE OF GRIEVANCE

Give an explanation of your grievance Include specific details concerning the action imposed and why you feel it was inappropriate You may attach additional sheets to this form if necessary

See attached

RELIEF SOUGHT

In your opinion how can your grievance be solved? Be as specific as possible

See attached

S/ James "Cal" Bell by Dona Gaffney
Employee (Grievant)

Home Address 407 Bell Rd
Donalds, SC Zip 29638

This form must be completed and submitted to the Office of Workforce Relations no later than 6/15/03 in compliance with SCDC policy/procedure ADM 11 02

Date 6/10/03

S/ [signature]
Director or Designee Office of Workforce Relations

Distribution White Grievance File
Yellow Division Director/Warden
Pink Grievant

2376

SCDC 16 33 (Rev s d Ap il 2000)

NATURE OF GRIEVANCE

I am employed as an educator in the Palmetto Unified School District This District is established by law and is composed of all schools in the South Carolina Department of Corrections State law also provides that the District's Board shall participate in the governance of the District

I have received notice that I have been separated from my education position due to reduction in force I offer the following objections to this separation

a Upon information and belief, the Department of Corrections did not involve the District's Board in the reduction in force,

b Upon information and belief, educators were singled out for reduction in force in an arbitrary and capricious fashion For example, I am informed that the Executive Director identified the fact that some educators are paid at a rate higher than some wardens as a justification for eliminating teaching positions This disparity, if it exists, is through no fault of educators who are paid in accordance with State law It is my belief that legal action taken by educators to compel the Department to provide compensation in accordance with law was a reason for eliminating education positions

c The restriction on "bumping rights" to designated areas within the Palmetto Unified School District is arbitrary, capricious and adversely effects veteran educators and educators holding advanced degrees It is my contention that the division of the Unified District into competitive areas deprives educators of meaningful recognition of years of service and is inconsistent with the statutory nature of the District,

d Upon information and belief, all educators were grouped under generic terms for purposes of reduction in force Such grouping is arbitrary, capricious and fails to recognize relevant criteria such as areas of certification, advanced training, degrees held and other employment qualifications

e Upon information and belief, the reduction in force plan is being exercised arbitrarily and capriciously to retaliate against a class of employees (educators) who petitioned the government, through legal action, to compel the Department to provide compensation in accordance with law

RELIEF SOUGHT

1 My grievance may be resolved by reinstatement to my former position as a educator with appropriate back pay and benefits

2 In addition to reinstatement, I seek verification from the Department that all employees were considered according to qualifications, positions held, service and performance in implementation of the reduction in force This relief would include uniform application of appropriate reduction in force criteria to all positions in the Palmetto Unified School District without regard to location

THIS OPINION HAS NO PRECEDENTIAL VALUE IT SHOULD NOT BE CITED OR RELIED ON AS PRECEDENT IN ANY PROCEEDING EXCEPT AS PROVIDED BY RULE 239(d)(2), SCACR

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie G Williams, and Paula Woodlief, Respondents,

v

South Carolina Department of Corrections and Palmetto Unified School District No 1, Defendants,

Of Whom South Carolina Department of Corrections is the Appellant

---

Appeal From Richland County
G Thomas Cooper, Jr , Circuit Court Judge

Unpublished Opinion No 2008-UP-257
Submitted May 1, 2008 – Filed May 14, 2008

APPEAL DISMISSED

Lake Eric Summers and Malone Thompson Summers, both of Columbia, for Appellant

W Allen Nickles, III, and Dona L Guffey, both of Columbia, for Respondents

PER CURIAM South Carolina Department of Corrections appeals the circuit court's order directing the Office of Human Resources to reinstate a grievance for a hearing before the State Employee Grievance Committee We dismiss[1] pursuant to Rule 220(b), SCACR, and the following authorities Levine v Sonoco Prods Co , 339 S C 492, 494, 530 S E 2d 127, 128 (2000), Montjoy v Asten-Hill Dryer Fabrics, 316 S C 52, 52, 446 S E 2d 618, 618 (1994), Owens v Canal Wood Corp , 281 S C 491, 492, 316 S E 2d 385, 385 (1984), Hunt v Whitt, 279 S C 343, 343, 306 S E 2d 621, 622 (1983) (all finding a circuit court order remanding a case for additional proceedings before an administrative agency is not directly appealable)

APPEAL DISMISSED

HEARN, C J , and SHORT and KONDUROS, JJ , concur

[1] We decide this case without oral argument pursuant to Rule 215, SCACR

STATE OF SOUTH CAROLINA
State Budget and Control Board
OFFICE OF HUMAN RESOURCES

MARK SANFORD CHAIRMAN
GOVERNOR

CONVERSE A CHELLIS III CPA
STATE TREASURER

RICHARD ECKSTROM CPA
COMPTROLLER GENERAL

HUGH K LEATHERMAN SR
CHAIRMAN SENATE FINANCE COMMITTEE

DANIEL T COOPER
CHAIRMAN WAYS AND MEANS COMMITTEE

FRANK W FUSCO
EXECUTIVE DIRECTOR

1201 MAIN STREET SUITE 800
COLUMBIA SOUTH CAROLINA 29201
(803) 737 0900

SAMUEL L WILKINS
DIRECTOR

June 4, 2008

CERTIFIED MAIL

Mr W Allen Nickles, III
Attorney at Law
Post Office Box 1866
Columbia, South Carolina 29202

Ms Robin N Gracien, Chief
Employee Relations Branch
Division of Human Resources
S C Department of Corrections
Post Office Box 21787
Columbia, South Carolina 29221-1787

Re James 'Cal Bell, et al v South Carolina Department of Corrections (SCDC)

Dear Mr Nickles and Ms Gracien

On May 20, 2008, this office received a copy of The South Carolina Court of Appeals opinion dated May 14, 2008, dismissing SCDC's appeal of Judge Gordon G Cooper's Order issued on January 10, 2007 Judge Cooper's Order states, in part, that ' there exist disputed issues of material fact which entitle Plaintiff's to a hearing before the State Employee Grievance Committee" and "the Office of Human Resources is directed to reinstate the grievance for a hearing before the State Employee Grievance Committee

Section 8-17-340 (A) of the S C Code of Laws of 1976, as amended, states in part "There is created the State Employee Grievance Committee constituted and appointed to serve as an administrative hearing body for state employee appeals " Section 8-17-320 (2) defines appeal as "the request by a covered employee to the State Human Resources Director for review of an agency's final decision concerning a grievance " In addition, State Human Resources Regulation 19-718 05 (F) provides "If the State Human Resources Director determines that additional action by the agency is necessary and appropriate, he may remand the appeal to the agency '

Since the grievants have not had an opportunity to complete SCDC s internal grievance process, additional action by the agency is necessary to establish a record and decision concerning the grievance, for review by the State Employee Grievance Committee Therefore, to effectuate the intent of Judge Cooper's Order and the opinion of the South Carolina Court of Appeals, the State Human Resources Director remands this matter to SCDC for processing according to its grievance policy In addition, since Judge Cooper's Order has established that material issues of fact exist regarding the application of SCDC's Reduction in Force policy in this case, SCDC must address the substantive issues regarding the grievance

If SCDC s final decisions are unfavorable to the grievants, or SCDC fails to make a decision within 45 calendar days of receipt of this remand, the grievants may institute an appeal to the State Human Resources Director within the time frames set forth in the State Employee Grievance Procedure Act and a hearing will be schedule before the State Employee Grievance Committee in accordance with Judge Cooper's Order

Sincerely,

Terry M Baggott
Managing Partner
Alternative Dispute Resolution Program

Enclosure

G. GEL, NICKLES & SOLOMON, PA
ATTORNEYS AT LAW
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July 23, 2008

Samuel L Wilkins, Esquire
State Budget and Control Board
Office of Human Resources
1201 Main Street, Suite 1000
Columbia, South Carolina 29201

RE James "Cal" Bell, Othella Bernard, Katherina Bowyer, Linda M W Bratton, Ann T Bridges, Rance C Cobb, Jeannie B Croxton, Bernetha L Culbreath, William K Dreyer, Jacqueline D Farr, Ruth Fritts, Nancy Glenn, Etta Jane Jones, Geneva M Martin, Mary H McCabe, Beverly McClanahan, Max D Randolph, Carolyn McIver Smith, Maggie L Williams, Paula Woodlief

Dear Sam

This matter has been remanded for a State Employee Grievance Committee Hearing by Judge G Thomas Cooper, Jr and the South Carolina Court of Appeals (Copies of these Orders are enclosed) Pursuant to Terry Baggott's letter dated June 4, 2008, the South Carolina Department of Corrections ("SCDC") grievants referenced above requested an opportunity to proceed at the SCDC Agency level The SCDC did not respond to the request and has not addressed the substantive issues presented by the grievants in direct contravention of the directives of your office, the Circuit Court and the Court of Appeals Because forty-five days have passed without action by the SCDC, the grievants hereby request an appeal through your office as provided by the State Employee Grievance Procedure Act

By way of background, each grievant submitted an initial request for appeal by letter dated June 20, 2003 Copies of these materials, an updated appeal form on behalf of each grievant and our initial letter of transmittal dated June 20, 2003 are enclosed By way of relief, each grievant seeks reinstatement to their former position, back pay, lost benefits, interest and any other relief available under the State Employee Grievance Procedure Act The grievants assert that their separations/removals/transfers/demotions were in violation of their rights as employees and cannot be supported by the challenged reduction in force The grievants assert that the SCDC employed others to perform their duties under different titles The grievants also preserve the material issues of fact identified in the attached correspondence of June 20, 2003 and Judge Cooper's Order of January 8, 2007

In view of the numerous, lengthy delays occasioned by the acts and omissions of the SCDC, it is our hope that, with the assistance of your office, this matter can be scheduled for an expeditious resolution I look forward to hearing from you

Sincerely,

W Allen Nickles, III

WAN/pfb
Enclosures
cc Terry Baggott (via facsimile, w/out enclosures)
Lake Eric Summers, Esquire (via facsimile, w/out enclosures)
File # 03-156

Code 1976 § 24-25 10

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails, Probations, Paroles and Pardons
Chapter 25 **Palmetto Unified School District** No 1
§ 24-25-10 Palmetto Unified School District No 1 established

There is hereby established a special statewide **unified school district** within the South Carolina Department of Corrections to be known as the **Palmetto Unified School District** No 1

HISTORY 1981 Act No 168, § 1

CROSS REFERENCES

School districts, generally, see §§ 59-17-10 et seq

LIBRARY REFERENCES

Schools ⇐23
Westlaw Topic No 345
C J S **Schools** and **School Districts** §§ 18, 29, 32, 63 to 68

Code 1976 § 24-25-10, SC ST § 24-25-10

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Code 1976 § 24-25-20

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails, Probations, Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1
§ 24-25-20 Purpose

The purpose of the district is to enhance the quality and scope of education for inmates within the Department of Corrections so that they will be better motivated and better equipped to restore themselves in the community The establishment of this district shall ensure that education programs are available to all inmates with less than a high school diploma, or its equivalent, and that various vocational training programs are made available to selected inmates with the necessary aptitude and desire Where enrollment in an education program must be restricted, justification for that restriction should be documented by the district

HISTORY 1981 Act No 168, § 2

LIBRARY REFERENCES

Schools ⇦23
Westlaw Topic No 345
C J S Schools and School Districts §§ 18, 29, 32, 63 to 68

Code 1976 § 24-25-20, SC ST § 24-25-20

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Code 1976 § 24-25-30

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails, Probations, Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1
➡§ 24-25-30 District schools to meet state standards, state Superintendent of Education to administer standards, reports, evaluations

Academic and vocational training provided by the Palmetto Unified School District No 1 shall meet standards prescribed by the State Board of Education, for the academic and vocational programs of these schools The State Superintendent of Education shall administer the standards relating to the educational programs of the district Reports shall be made by the State Department of Education to the Board of Trustees indicating the degree of compliance with the standards prescribed by the State Board of Education at least annually Such State Department of Education supervisory personnel as deemed appropriate by the Department shall be utilized for evaluating the programs of the district and reporting to the district board

HISTORY 1981 Act No 168, § 3

CROSS REFERENCES

General duties of State Superintendent of Education, see § 59-3-30

LIBRARY REFERENCES

Schools ⇦23
Westlaw Topic No 345
C J S Schools and School Districts §§ 18, 29, 32, 63 to 68

Code 1976 § 24-25-30, SC ST § 24 25-30

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Code 1976 § 24-25-35

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails, Probations, Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1
§ 24-25-35 Funds for certain educational programs

The Palmetto Unified School District 1 of the South Carolina Department of Corrections shall submit appropriate student membership information to the State Department of Education and the South Carolina Department of Education s appropriation request under the line item "Education Finance Act" shall include sufficient funds for the Palmetto Unified School District 1 The amount to be requested for the Palmetto Unified School District 1 shall be sufficient to produce funds equal to the product of the number of students served by the school district weighted according to the criteria established by the South Carolina Department of Education under the provisions of the South Carolina Education Act of 1977 and the state portion of the appropriated value statewide of the base student costs, adjusted for twelve months operation The Palmetto Unified School District No 1 shall comply with the following provisions of subsection (4) of Section 59-20-50, subsections (1), (2), (3)(a), (4)(b), (c), (d), (e), and (f) of Section 59-20-60 The South Carolina Department of Education annually shall determine that these provisions are being met and include its findings in the report mandated in subsection (5)(e) of Section 59-20-60 If the accreditation standards set forth in the Defined Minimum Program for the Palmetto Unified School District No 1 as approved by the State Board of Education are not met, funds by this section shall be reduced the following fiscal year according to the provisions set forth in the Education Finance Act

HISTORY 1994 Act No 497, Part II, § 15B

Code 1976 § 24-25-35, SC ST § 24 25-35

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Code 1976 § 24-25-40

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails, Probations, Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1
§ 24-25-40 Trustees of school district, appointment, terms, vacancies

The Palmetto Unified School District No 1 shall be under the control and management of a board of nine trustees who shall operate the district under the supervision of the State Department of Corrections Four members of the school board shall be appointed by the Director of the Department of Corrections, four members of the school board shall be appointed by the State Superintendent of Education, and one member of the school board shall be appointed by the Governor The members of the board shall be appointed for terms of four years each and until their successors are appointed and qualify, except that of those first appointed, the members appointed by the Director of the Department of Corrections and the members appointed by the State Superintendent of Education shall be appointed for terms of one, two, three and four years, respectively, such terms to be designated by the Director of the Department of Corrections and the State Superintendent of Education when making such appointments The member initially appointed by the Governor also shall be appointed for a term of four years Vacancies on the board shall be filled for the remainder of the unexpired term by appointment in the same manner as provided for the original appointment

HISTORY 1981 Act No 168, § 4, 1993 Act No 181, § 483

CROSS REFERENCES

Boards of school districts, see §§ 59-19-10 et seq

LIBRARY REFERENCES

Schools ⇐51
Westlaw Topic No 345
C J S Schools and School Districts §§ 15, 77 to 79, 110 to 112, 114 to 140, 142 to 166, 205, 254, 356, 401

Code 1976 § 24-25-40, SC ST § 24-25-40

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Code 1976 § 24-25-50

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails, Probations, Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1
➡§ 24-25-50 Removal of school board members

The members of the school board may be removed at any time for good cause by the Director of the Department of Corrections The failure of any member of the school board to attend at least three consecutive meetings thereof, unless excused by formal vote of the school board, may be construed by the Director of the Department of Corrections as a resignation from the school board

HISTORY 1981 Act No 168, § 5, 1993 Act No 181, § 484

CROSS REFERENCES

Removal of school district trustees, generally, see § 59-19-60

LIBRARY REFERENCES

Schools ⇦51
Westlaw Topic No 345
C J S Schools and School Districts §§ 15, 77 to 79, 110 to 112, 114 to 140, 142 to 166, 205, 254, 356, 401

Code 1976 § 24-25-50, SC ST § 24-25 50

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Code 1976 § 24-25-60

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails, Probations, Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1
§ 24-25-60 Board to elect officers, terms, meetings, compensation

The school board at its first meeting, and every two years thereafter, shall elect a chairman, a vice-chairman and such other officers as it deems necessary who shall serve for two years each and until their successors are elected and qualify No person may succeed himself as chairman of the board The school board shall meet at least quarterly and at such other times as may be designated by the chairman Special meetings may be called by the chairman or by a majority of the members of the board upon at least seventy-two hours notice Five members of the board shall constitute a quorum at all meetings thereof The members of the board shall be paid per diem, mileage and subsistence as provided by law for members of boards, commissions and committees

HISTORY 1981 Act No 168, § 6

CROSS REFERENCES

Organization of school district boards of trustees, generally, see § 59-19- 70

LIBRARY REFERENCES

Schools ⇐63
Westlaw Topic No 345
C J S Schools and School Districts §§ 110, 112, 114, 116, 129, 141 to 142, 168 to 191, 194 to 195, 218, 244, 248, 253, 259, 264 to 265, 321, 341 to 342, 346, 725

Code 1976 § 24-25-60, SC ST § 24-25-60

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Code 1976 § 24-25 70

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails, Probations, Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1
§ 24-25-70 Powers and duties of school board

With the consent and concurrence of the Director of the Department of Corrections, the board of the school district shall operate as executory agent for the schools under its jurisdiction and shall perform administrative functions as follows

(1) establish goals and objectives for the operation of the district,
(2) enter into agreements and contracts with other school districts, technical schools, colleges and universities,
(3) establish academic education programs ranging from primary through post high school, as well as special education for the handicapped and mentally retarded,
(4) establish vocational and trade courses as appropriate for preparation for employment,
(5) determine physical facilities needed to carry out all education programs,
(6) review and approve applications for grants, donations, contracts and other agreements from public or private sources,
(7) establish a twelve-month school program and teachers pay schedule based on the state and average school supplement pay scales,
(8) present an annual educational budget to the Department of Corrections for submission to the General Assembly The Department of Corrections when making its annual budget request shall incorporate as a line item the budget of the district within its request To the extent permitted by law, any funds which may be appropriated by the General Assembly for the operation of the district shall not prohibit the district from securing any applicable federal funds or other funds which are available

HISTORY 1981 Act No 168, § 7, 1993 Act No 181, § 485

CROSS REFERENCES

General powers and duties of school trustees, see § 59-19-90

LIBRARY REFERENCES

Schools ⇐55
Westlaw Topic No 345
C J S Schools and School Districts §§ 15, 110 to 111, 142 to 144, 147, 205, 254, 356, 401

NOTES OF DECISIONS

In general 1
Teacher compensation 2

1 In general

Statutory provisions governing compensation, salary adjustments, and annual leave did not create employment contract between corrections school district teachers, school district, and Department of Corrections (DOC), as statutes did not evidence any intent by General Assembly to create contractual rights Abraham v Palmetto Unified School Dist No 1 (S C App 2000) 343 S C 36, 538 S E 2d 656, rehearing denied Prisons ⇐8

2 Teacher compensation

Statute that directed school board to establish pay scales for teachers in twelve-month corrections system school program required board to pay teachers salary supplement, in addition to state-wide minimum salary, based on state-wide supplement average, as interpreting term 'average school supplement' to mean that board was only require to pay state minimum salary would be untenable, and use of plural term scales evinced intention to pay teachers based on two schedules, state pay scale and average school supplement scale Abraham v Palmetto Unified School Dist No 1 (S C App 2000) 343 S C 36, 538 S E 2d 656, rehearing denied Prisons ⇦ 8

Fact that benefits received by teachers in corrections department school district exceeded those received by teachers in public school districts did not relieve Department of Corrections and school district from obligation to pay teachers according to law, as nothing in overall legislative scheme governing pay permitted extra benefits to be set-off against teachers' salaries Abraham v Palmetto Unified School Dist No 1 (S C App 2000) 343 S C 36, 538 S E 2d 656, rehearing denied Prisons ⇦ 8

Teachers who worked in corrections school district on twelve-month schedule were compensated at same rate as public school teachers, despite teachers claims that they were not compensated for holidays and vacation time, as year-round teachers worked 235 days, as compared to 190-day work year for public school teachers, and corrections school district teachers were paid 124 percent of public school teachers salaries Abraham v Palmetto Unified School Dist No 1 (S C App 2000) 343 S C 36, 538 S E 2d 656, rehearing denied Prisons ⇦ 8

Code 1976 § 24-25-70, SC ST § 24-25-70

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Code 1976 § 24-25-80

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails, Probations, Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1
§ 24-25-80 Duties of district Superintendent of Education

The duties of the district Superintendent of Education shall include the following

(1) Identify goals and objectives for all educational services of the district,
(2) Develop policies and procedures for efficient delivery system of such services,
(3) Collect and analyze data necessary for research into planning and evaluation of educational services,
(4) Provide necessary information for preparation of an annual report of the district's operation,
(5) Prepare a separate budget of all necessary costs to be provided to the inmate by the unified school district,
(6) Recommend to the school board plans for the renovations and designation of educational facilities,
(7) Provide all such studies, research and evaluation of the district s operation as the board may request and perform such other duties as it may request

HISTORY 1981 Act No 168, § 8

CROSS REFERENCES

General duties of county and district superintendents, see § 59-13-60

LIBRARY REFERENCES

Schools ⇐63
Westlaw Topic No 345
C J S. Schools and School Districts §§ 110, 112, 114, 116, 129, 141 to 142, 168 to 191, 194 to 195, 218, 244, 248, 253, 259, 264 to 265, 321, 341 to 342, 346, 725

Code 1976 § 24 25-80, SC ST § 24-25-80

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Code 1976 § 24-25-90

Code of Laws of South Carolina 1976 Annotated Currentness
Title 24 Corrections, Jails, Probations, Paroles and Pardons
Chapter 25 Palmetto Unified School District No 1
§ 24-25-90 Superintendent and other personnel to be employed according to Department of Correction policies

The superintendent of the district and all other educational personnel shall be employed, supervised, and terminated according to the South Carolina Department of Corrections' personnel policies and procedures

HISTORY 1981 Act No 168, § 9

LIBRARY REFERENCES

Schools ⇐63
Westlaw Topic No 345
C J S Schools and School Districts §§ 110, 112, 114, 116, 129, 141 to 142, 168 to 191, 194 to 195, 218, 244, 248, 253, 259, 264 to 265, 321, 341 to 342, 346, 725

Code 1976 § 24-25-90, SC ST § 24-25-90

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South Carolina Department of Corrections

MARK SANFORD Governor
JON E OZMINT Director

TO Board of Trustees
Palmetto Unified School District

FROM Wendell J Blanton, Superintendent

SUBJECT School Board Meeting Scheduled for April 17, 2003

DATE April 7, 2003

It has been determined that five of nine board members will not be able to attend the school board meeting planned for April 17, 2003 at MacDougall Correctional Institution This means that we would not have a quorum. After conferring with Jim Harvey, Chairman, I am notifying you that we will return to our usual meeting place in the SCDC Headquarters Building, Rooms 216 – 217 We will meet at 10 00 a.m on April 17, 2003 If a quorum is not present we cannot take official action but can share information In the hope that a quorum is possible in our usual meeting place, I am attaching an agenda for this meeting The minutes of our previous meeting are also attached

As you may have read in the newspaper, we are experiencing a reduction-in-force action involving 87 education positions You will be provided more information on April 17, 2003

Please join us if at all possible If you are unable to attend, please notify Teresa Cobb at 896-1568

Wendell J Blanton

WJB tc

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SOUTH CAROLINA DEPARTMENT OF CORRECTIONS

PALMETTO UNIFIED SCHOOL DISTRICT NO 1
Minutes of Board Meeting

April 17, 2003

Board Members Present

Jim Harvey
Earl Brown
Les Levy
Carolyn Williams

Staff Present

Wendell Blanton
Hoyt Sharpe
Teresa Cobb

Others Present

Felicia Poston

The meeting was called to order at 10 00 a m and Mr Earl Brown gave the invocation

The members that were present approved the minutes from the previous meeting

Mr Harvey informed the Board that, since there was not a quorum present, any matters that needed action would be deferred until the next meeting All agreed

Mr Harvey asked Mr Blanton to give a superintendent's report Mr Blanton passed out the Agency Organizational Chart (see attached) Mr Blanton told the Board that Ms Anderson, Director of Program Services, had been reassigned to be the warden at Camille Graham Correctional Center He understands that the staff at the institution is very pleased to have Ms Anderson especially since she is very supportive of programs He said that he was very appreciative of all the support that Ms Anderson gave education over the past several months The new Acting Director for the Division of Programs and Services is Ms Geraldine Miro Mr Blanton said that Ms Miro would be responsible for several additional divisions He thinks this may be an advantage because she is over other divisions that Education deals with on a regular basis

Mr Blanton handed out copies of the Mission Statement (see attached) He reminded the Board that he had asked for input from them at the last meeting He also had asked for input from the principals and educational coordinators The statements were compiled and the principals and educational coordinators voted on the one they preferred The statement presented to the Board members won by a landslide He will present it at the next meeting to be officially accepted by the Board as our mission statement

Mr Harvey asked Felicia Poston to give a budget update Ms Poston handed out the Third Quarter Projected Budget Compared to Year-to-Date Expenditures report (see attached) She gave an overview of the report

Mr Blanton suggested that, since there was not a quorum present, the election of officers should be deferred until the next meeting Mr Levy asked if Evelyn Segui would accept the position of Chairman for next year Carolyn Williams offered to call her

Mr Blanton gave an overview of the agency's reduction in force plan. Of the 148 positions eliminated, 84 are from the Division of Education He provided a copy of the document of notification provided to employees (see attached) Mr Blanton handed out a list of employees that were notified that their jobs had been eliminated (see attached) He explained that some of these employees would have bumping rights The reduction-in-force process was in the early stages He provided a list of employees at institutions not greatly affected by the RIF (see attached) He also provided a list of remaining staff (SCDC and county funded programs) available at the institutions greatly affected by the RIF (see attached)

Board members expressed great regret that our educational mission had been negatively affected in this manner

Meeting was adjourned at 11 10 p m.

Respectfully submitted,

Teresa Cobb

Reviewed By _____
Wendell Blanton, Superintendent

PALMETTO UNIFIED SCHOOL DISTRICT
Projected Budget Compared to Year To Date Expenditures
FY 2002 2003
Third Quarter
04/17/03

Program	2002 2003 Projected Expenditures Through 6/30/03	Actual Expenditures Through 03/31/03	Percent of Available Funds Used to Date	2002 2003 Funds Available	Projected Expenditures vs Funds Available
STATE					
Administration	191 264	164 183			
Library Services	510 037	437 659			
Occupational Education	2 040 150	1 358 224			
Guidance	510 037	409 623			
Academic	2 613 942	1 964 642			
Special Education	63 755	60 527			
School Administration	446 283	345 515			
Employer Contributions	2 142 159	1 600 558			
TOTAL STATE FUNDS	8 517 627	6,340 933	91 /	6 954 812	(1 562 815)
EFA					
Administration	18 333	8 991			
Library Services	109 995	82 827			
Occupational Education	439 981	315 421			
Guidance	146 660	103 772			
Academic	879 961	657 778			
Special Education	91 663	68 339			
School Administration	146 660	106 442			
Employer Contributions	636 932	278 507			
TOTAL EFA FUNDS	2 470 184	1 622 078	57 /	2 864 113	393 929
EIA					
Administration	1 946	897			
Library Services	31 130	23 907			
Occupational Education	95 337	72 502			
Guidance	38 913	31 111			
Academic	179 000	137 314			
Special Education	11 674	9 646			
School Administration	31 130	25 621			
Employer Contributions	42 231	64 345			
TOTAL EIA FUNDS	431 362	365 343	85 /	431 362	(0)
FEDERAL					
Administration	10 000	4 304		10 000	
Library Services	8 286	7 615		8 286	
Occupational Education	226 679	95 463		427 409	
Guidance	0	0		0	
Academic	1 579 144	653 900		1 779 144	
Special Education	165 897	57 797		165 897	
TOTAL FEDERAL FUNDS	1 990 006	819 080	34 /	2 390 736	400 730
OTHER					
Administration	7 944	5 096		101 447	
Library Services	26 075	17 016		26 075	
Occupational Education	163 150	112 522		163 150	
Guidance	500	0		500	
Academic	236 120	127 199		236 120	
Special Education	1 150	1 099		1 150	
School Administration	21 153	15 207		21 153	
Employer Contributions	0	0		0	
TOTAL OTHER FUNDS	456 092	278 139	51 /	549 595	93 503
EFA Carryover Funds Available				94 284	94 284
TOTAL ALL FUNDS	13 865 271	9 425 572	71 /	13 284 902	(580 369)
Less Federal Funds Projected to be Carned Over or Returned					(400 730)
Less EFA/EIA Balance to be carned forward for 2003 2004					(393 929)
TOTAL PROJECTED BALANCE FOR 2002 2003					(1 375 027)

EFA Carryover that has been budgeted is included in this figure
Other 2002 2003 Budget includes ABE State EIA equipment EFA Carry Over budgeted

SCDC FILLABLE VACANCIES AS OF JUNE 1 2003

	STATE TITLE	SCDC TITLE	BAND	LEVEL	LOCATION
EB50	PHYSICIAN II	PSYCHIATRIST II	10	D	BEHAVIORAL MEDICINE
EB50	PHYSICIAN II	PHYSICIAN	10	A	LEE
EC10	MEDICAL ASSISTANT TECH I	CNA	02	C	EVANS
EC10	MEDICAL ASSISTANT TECH I	CNA	02	C	LIEBER
EC10	MEDICAL ASSISTANT TECH I	CNA	02	C	MCCORMICK
EC10	MEDICAL ASSISTANT TECH I	CNA	02	C	PERRY
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	ALLENDALE
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	BROAD RIVER
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	CAMILLE GRAHAM
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	CAMPBELL
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	CENTRAL BUS TERMINAL
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	COASTAL
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	GOODMAN
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	KERSHAW
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	KIRKLAND
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	LEATH
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	LEBER
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	LEE
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	LIVESAY
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	MACDOUGALL
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	MANNING
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	MCCORMICK
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	NORTHSIDE
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	PALMER
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	PERRY
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	STEVENSON
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	TURBEVILLE
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	TYGER RIVER
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	WALDEN
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	WATEREE RIVER
JD30	CORRECTIONAL OFFICER I	CORR OFFICER	3	E	WATKINS
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	ALLENDALE
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	BROAD RIVER
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	CAMILLE GRAHAM
JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	CAMPBELL
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	CENTRAL BUS TERMINAL
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	CENTRAL BUS TERMINAL
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	EVANS

SCDC FILLABLE VACANCIES AS OF JUNE 1, 2003

	STATE TITLE	SCDC TITLE	BAND	LEVEL	LOCATION
35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	EVANS
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	EVANS
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	GOODMAN
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	INTERNAL AFFAIRS
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KIRKLAND
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEATH
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEATH
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEATH
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEE
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER
JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	LIVESAY
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	LOWER SAVANNAH
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	PERRY
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	PERRY
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND
5	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND
35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	SECURITY DIVISION
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY DIVISION
JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	SECURITY DIVISION
JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON
JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TURBEVILLE
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER
JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	WATEREE RIVER
JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	WATKINS
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	ALLENDALE
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	BROAD RIVER
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	BROAD RIVER
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	KERSHAW
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LEE
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LEE
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LEE
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LIEBER
0	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MCCORMICK

SCDC FILLABLE VACANCIES AS OF JUNE 1, 2003

S	STATE TITLE	SCDC TITLE	BAND	LEVEL	LOCATION
10	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT II	05	C	TRAINING ACADEMY
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TURBEVILLE
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TURBEVILLE
JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	BROAD RIVER
JD50	CORRECTIONAL OFFICER IV	CAPTAIN II	06	A	COASTAL
JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	EVANS
JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	LEATH
JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	LEE
JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	LEE
JD50	CORRECTIONAL OFFICER IV	CAPTAIN II	06	A	LIVESAY
JD50	CORRECTIONAL OFFICER IV	CAPTAIN II	06	A	LOWER SAVANNAH
JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	TRENTON
JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	TYGER RIVER
JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	TYGER RIVER
JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	TYGER RIVER
JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	WATEREE RIVER
JD50	CORRECTIONAL OFFICER IV	CAPTAIN II	06	A	WATKINS
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	ALLENDALE
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	CATAWBA
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	KERSHAW
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	KIRKLAND
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	KIRKLAND
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	LIEBER
15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	LOWER SAVANNAH
15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	NORTHSIDE
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	PERRY
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	RIDGELAND
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	RIDGELAND
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	TRENTON
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	TYGER RIVER
KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	KERSHAW
KB25	FOOD SERVICE SPEC V	FOOD SVC SPEC V	05	B	LEE
KB25	FOOD SVC SPECIALIST V	FOOD SVC SPEC V	05	B	WALDEN

POSITIONS BEING ELIMINATED AND EMPLOYEES ELIGIBLE FOR BUMPING IN EACH COMPETITIVE AREA

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L A S S	B A N D	L E V L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		BROWN CLAUDIA B	W	F	50	AA50	03	A	ADMIN SPECIALIST II	11/1/98	01	KIRKLAND CORRECTIONAL INSTITUTION
		INGRAM GLENDA C	W	F	47	AA50	03	C	ADMIN SPECIALIST II	12/4/98	01	MANNING CORRECTIONAL INSTITUTION
		MILLER LISA A	W	F	29	AA50	03	C	ADMIN SPECIALIST II	6/17/99	01	DIV OF CLASSIFICATION & INMATE RECORD
		MORGAN CORIE L	B	F	26	AA50	03	C	ADMIN SPECIALIST II	4/16/00	01	KIRKLAND CORRECTIONAL INSTITUTION
3	P	HODGE LORETTA D	B	F	45	AA50	03	C	ADMIN SPECIALIST II	9/17/02	01	KIRKLAND CORRECTIONAL INSTITUTION
		WILSON BEATRICE YOUNG	B	F	65	AA25	02	C	ADMIN SPECIALIST I	9/10/77	01	GOODMAN CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
		CLAYTOR LYDIA C	W	F	62	AA75	04	B	ADMINISTRATIVE ASSISTANT	7/14/69	01	CAMPBELL PRE RELEASE CENTER
		DEAS VALVITA M	B	F	58	AA75	04	D	ADMINISTRATIVE ASSISTANT	10/24/72	01	STEVENSON CORRECTIONAL INSTITUTION
		HINSON DENISE G	W	F	43	AA75	04	D	ADMINISTRATIVE ASSISTANT	12/9/74	01	BROAD RIVER CORRECTIONAL INSTITUTION
		DOZIER MARILYN	W	F	46	AA75	04	A	ADMINISTRATIVE ASSISTANT	8/7/75	01	EDUCATIONAL SERVICES
		MONTGOMERY JANICE L	B	F	48	AA75	04	D	ADMINISTRATIVE ASSISTANT	4/2/77	01	BROAD RIVER CORRECTIONAL INSTITUTION
		MODZELEWSKI KATHLEEN M	W	F	60	AA75	04	D	ADMINISTRATIVE ASSISTANT	5/12/79	01	OFFICE OF GENERAL COUNSEL
1		ALEXANDER EDNA N	B	F	47	AA75	04	D	ADMINISTRATIVE ASSISTANT	12/21/79	01	DIV OF INSP & OPER REV
		RAWL LYNDA R	W	F	61	AA75	04	D	ADMINISTRATIVE ASSISTANT	5/1/81	01	DIVISION OF POLICY DEVELOPMENT
		LONG REBECCA A	W	F	53	AA75	04	A	ADMINISTRATIVE ASSISTANT	3/17/83	01	CONSTRUCTION ADMINISTRATION
		FOLEY JENNIFER A	W	F	39	AA75	04	A	ADMINISTRATIVE ASSISTANT	4/15/83	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		HINGLE DIANE	W	F	51	AA75	04	D	ADMINISTRATIVE ASSISTANT	9/17/83	01	DIV OF CLASSIFICATION & INMATE RECORD
		ROBERTSON ALICE J	B	F	48	AA75	04	A	ADMINISTRATIVE ASSISTANT	7/29/84	01	DIRECTOR S OFFICE ADMINISTRATION
		BEIDLER SANDRA J	W	F	41	AA75	04	D	ADMINISTRATIVE ASSISTANT	10/27/84	01	KIRKLAND CORRECTIONAL INSTITUTION
		MELTON LINDA G	W	F	52	AA75	04	B	ADMINISTRATIVE ASSISTANT	4/18/85	01	MANNING CORRECTIONAL INSTITUTION
		WIGGINS BARBARA A	B	F	52	AA75	04	A	ADMINISTRATIVE ASSISTANT	7/27/85	01	BROAD RIVER CORRECTIONAL INSTITUTION
		TOOLE LOUISE W	W	F	59	AA75	04	A	ADMINISTRATIVE ASSISTANT	12/21/85	01	VEHICLE COMMUNICATION MANAGEMENT
		DRISKELL DONALD L	W	M	38	AA75	04	D	ADMINISTRATIVE ASSISTANT	2/6/86	01	BROAD RIVER CORRECTIONAL INSTITUTION
		HORNSBY JUDY H	W	F	49	AA75	04	A	ADMINISTRATIVE ASSISTANT	3/6/86	01	STEVENSON CORRECTIONAL INSTITUTION
		STACKHOUSE ZIGMOND A	B	M	45	AA75	04	C	ADMINISTRATIVE ASSISTANT	3/12/86	01	MAIL ROOM
		BRADLEY JUDY K	B	F	49	AA75	04	E	ADMINISTRATIVE ASSISTANT	9/11/86	01	WALDEN CORRECTIONAL INSTITUTION
		KELLY LATONYA Y	B	F	38	AA75	04	D	ADMINISTRATIVE ASSISTANT	1/30/87	01	MANNING CORRECTIONAL INSTITUTION
		BANKS SHIRLEY J	W	F	51	AA75	04	A	ADMINISTRATIVE ASSISTANT	2/5/87	01	CIV LABOR POOL 9511
		PAGE SONYA M	B	F	36	AA75	04	D	ADMINISTRATIVE ASSISTANT	3/27/87	01	DIVISION III INSTITUTIONS
		MCMANUS MINDY L	W	F	35	AA75	04	D	ADMINISTRATIVE ASSISTANT	7/16/87	01	RECRUITING & EMPLOYMENT SERVICES
		EMERSON NELDA J	W	F	55	AA75	04	A	ADMINISTRATIVE ASSISTANT	12/4/87	01	KIRKLAND CORRECTIONAL INSTITUTION
		MULLER GAIL J	W	F	55	AA75	04	B	ADMINISTRATIVE ASSISTANT	9/24/88	01	GOODMAN CORRECTIONAL INSTITUTION
		GOUDELOCK DELORES J	W	F	65	AA75	04	D	ADMINISTRATIVE ASSISTANT	12/6/90	01	PURCHASING BRANCH
		SANSBURY RAMONA Z	W	F	57	AA75	04	D	ADMINISTRATIVE ASSISTANT	2/8/91	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		BRAZELL NORA S	W	F	57	AA75	04	D	ADMINISTRATIVE ASSISTANT	6/6/91	01	MAINTENANCE ADMINISTRATION
		SKIDMORE MIRIAM M	W	F	60	AA75	04	B	ADMINISTRATIVE ASSISTANT	6/20/91	01	CANTEEN WHSE INVENTORY/DISTRIBUTION
		FULLER DEBRA F	W	F	45	AA75	04	C	ADMINISTRATIVE ASSISTANT	6/28/91	01	CAMILLE GRAHAM CORRECTIONAL INST
		CHRETIAN FLORENCE J	B	F	45	AA75	04	D	ADMINISTRATIVE ASSISTANT	8/9/91	01	MANNING CORRECTIONAL INSTITUTION
1		CRIDER REBEKAH S	W	F	34	AA75	04	D	ADMINISTRATIVE ASSISTANT	8/9/91	01	YOUNG OFFENDER DIV

POSITIONS ING ELIMINATED AND EMPLOYEES ELIGIBLE FOR BUMPING IN EACH COMPE IVE AREA

R I F 123		EMPLOYEE NAME	RACE CEX AGE	CLASS JOBS	CL BAND	CL EV	CLASSIFICATION TITLE	RIF SVC DATE	CAR ME PA	LOCATION
		MYERS MARILYN	B F 42	AA75	04 B		ADMINISTRATIVE ASSISTANT	9/13/91	01	STEVENSON CORRECTIONAL INSTITUTION
		CANNARELLA DENISE M	W F 44	AA75	04 D		ADMINISTRATIVE ASSISTANT	9/20/91	01	OFFICE OF GENERAL COUNSEL
		WISE DEBRA M	B F 34	AA75	04 D		ADMINISTRATIVE ASSISTANT	11/19/91	01	KIRKLAND CORRECTIONAL INSTITUTION
		WAITES THERESA H	W F 56	AA75	04 A		ADMINISTRATIVE ASSISTANT	2/2/92	01	CIV LABOR POOL 9511
		ARD CAROL B	W F 52	AA75	04 E		ADMINISTRATIVE ASSISTANT	5/1/92	01	DEPUTY DIR FOR MED & PROF HEALTH SERV
		COBB TERESA F	W F 52	AA75	04 D		ADMINISTRATIVE ASSISTANT	6/5/92	01	EDUCATIONAL SERVICES
		OSTRANDER SHARRON S	W F 51	AA75	04 D		ADMINISTRATIVE ASSISTANT	8/1/92	01	DIVISION OF INTERNAL AFFAIRS
		MUELLER CAROLE J	W F 59	AA75	04 D		ADMINISTRATIVE ASSISTANT	9/13/92	01	DIVISION I INSTITUTIONS
		JEFFCOAT JUNETTE	W F 42	AA75	04 D		ADMINISTRATIVE ASSISTANT	12/18/92	01	VEHICLE COMMUNICATION MANAGEMENT
		DURHAM ANITA I	W F 55	AA75	04 A		ADMINISTRATIVE ASSISTANT	2/13/93	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
1		MYERS KATHERINE M	W F 50	AA75	04 A		ADMINISTRATIVE ASSISTANT	2/20/93	01	EDUCATIONAL SERVICES
		WOODS DOROTHY D	W F 58	AA75	04 D		ADMINISTRATIVE ASSISTANT	6/13/93	01	KIRKLAND CORRECTIONAL INSTITUTION
		FORBES VERNA A	B F 39	AA75	04 A		ADMINISTRATIVE ASSISTANT	7/10/93	01	BROAD RIVER CORRECTIONAL INSTITUTION
		TOWER MICHELE M	W F 41	AA75	04 D		ADMINISTRATIVE ASSISTANT	8/17/93	01	CANTEEN WHSE INVENTORY/DISTRIBUTION
		PALMER JEANNIE	B F 42	AA75	04 D		ADMINISTRATIVE ASSISTANT	9/20/93	01	RECRUITING & EMPLOYMENT SERVICES
		CALDWELL KIMMERLY Y	B F 38	AA75	04 D		ADMINISTRATIVE ASSISTANT	1/9/94	01	OFFICE OF GENERAL COUNSEL
		GRABER JR ALVIN	B M 38	AA75	04 D		ADMINISTRATIVE ASSISTANT	4/30/94	01	KIRKLAND CORRECTIONAL INSTITUTION
		REED REATHER M	B F 43	AA75	04 A		ADMINISTRATIVE ASSISTANT	9/22/94	01	KIRKLAND CORRECTIONAL INSTITUTION
		WHITAKER DESHAWN M	B F 29	AA75	04 A		ADMINISTRATIVE ASSISTANT	1/6/95	01	SECURITY DIVISION
		RICHARDSON SANDRA J	O F 31	AA75	04 B		ADMINISTRATIVE ASSISTANT	2/24/95	01	DIV OF CLASSIFICATION & INMATE RECORD
		STOCKER JIMMY M	W M 49	AA75	04 C		ADMINISTRATIVE ASSISTANT	3/31/95	01	CANTEEN WHSE INVENTORY/DISTRIBUTION
		PAGE MARY N	W F 59	AA75	04 A		ADMINISTRATIVE ASSISTANT	4/14/95	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		WHITE MICHELLE	B F 31	AA75	04 D		ADMINISTRATIVE ASSISTANT	3/1/96	01	CAMILLE GRAHAM CORRECTIONAL INST
		BROWN MITCHELL DAYNA L	B F 47	AA75	04 D		ADMINISTRATIVE ASSISTANT	3/10/96	01	DIVISION OF HUMAN RESOURCES
		PRIDGEN NADINE L	W F 39	AA75	04 D		ADMINISTRATIVE ASSISTANT	3/16/96	01	DEPUTY DIR FOR MED & PROF HEALTH SERV
		HARGROVE BOBBY	B M 46	AA75	04 A		ADMINISTRATIVE ASSISTANT	5/4/96	01	CAMILLE GRAHAM CORRECTIONAL INST
		BRIGMAN MICHELLE G	W F 35	AA75	04 A		ADMINISTRATIVE ASSISTANT	5/24/96	01	DEPUTY DIRECTOR ADMINISTRATION
		SMITH FERNETHIA P	B F 44	AA75	04 D		ADMINISTRATIVE ASSISTANT	6/22/96	01	CAMILLE GRAHAM CORRECTIONAL INST
		HUGHES JOE L	B M 49	AA75	04 D		ADMINISTRATIVE ASSISTANT	6/22/96	01	MANNING CORRECTIONAL INSTITUTION
		BROWN MARGARET A	W F 60	AA75	04 D		ADMINISTRATIVE ASSISTANT	6/29/96	01	DIV OF CLASSIFICATION & INMATE RECORD
		AMICK DONNA C	W F 39	AA75	04 D		ADMINISTRATIVE ASSISTANT	7/12/96	01	DIV OF MEDICAL & PROF HEALTH SVCS
1		ZANDERS SYLINDA P	B F 34	AA75	04 D		ADMINISTRATIVE ASSISTANT	9/22/96	01	SUBSTANCE ABUSE SVCS DIV
		HOPKINS SHARON D	B F 42	AA75	04 D		ADMINISTRATIVE ASSISTANT	10/11/96	01	BEHAVIORAL MEDICINE DIVISION
		HARVEY SALLIE C	W F 53	AA75	04 D		ADMINISTRATIVE ASSISTANT	12/2/96	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		BAKER BEVERLY M	W F 51	AA75	04 A		ADMINISTRATIVE ASSISTANT	2/24/97	01	OFFICE OF GENERAL COUNSEL
		FANNIN GARY L	W M 56	AA75	04 D		ADMINISTRATIVE ASSISTANT	5/16/97	01	CAMPBELL PRE RELEASE CENTER
3		POSTELL CECIL A	B M 44	AA75	04 B		ADMINISTRATIVE ASSISTANT	6/14/97	01	DIV OF MEDICAL & PROF HEALTH SVCS
3		WESSINGER DEBBIE S	W F 41	AA75	04 A		ADMINISTRATIVE ASSISTANT	11/8/97	01	WATKINS PRE RELEASE CENTER
3		NESBITT VALERIE L	B F 39	AA75	04 A		ADMINISTRATIVE ASSISTANT	11/6/98	01	DIV OF CLASSIFICATION & INMATE RECORD
3	P	TUCKER LISA A	B F 29	AA75	04 D		ADMINISTRATIVE ASSISTANT	11/12/02	01	VICTIM SERVICES DIVISION
		TOTAL POSITIONS ELIMINATED 4								

SEE P FR SECT O OF P E P

POSITIONS BEING ELIMINATED AND EMPLOYEES ELIGIBLE FOR BUMPING IN EACH COMPETITIVE AREA

R I F 123	EMPLOYEE NAME	R A C E	S E X	A G E	C L A S S	B A S E	L E V E L	CLASSIFICATION TITLE	RIF SVC DATE	C A R E R P A	LOCATION
	WOLVERTON LINDA M	W	F	38	AD03	04	A	FISCAL TECHNICIAN II	6/11/87	01	FOOD SER WHSE INVENTORY/DISTRIBUTION
	SWINSON LORI M	W	F	37	AD03	04	A	FISCAL TECHNICIAN II	2/14/94	01	FINANCIAL ACCOUNTING
	PURVIS RUTHIE M	B	F	54	AD03	04	A	FISCAL TECHNICIAN II	3/3/94	01	CIV LABOR POOL 9511
	JORDAN SUSAN E	W	F	69	AD01	03	D	FISCAL TECHNICIAN I	2/4/74	01	FINANCIAL ACCOUNTING
	DAVIS DOROTHY M	B	F	47	AD01	03	D	FISCAL TECHNICIAN I	6/17/83	01	FOOD SERVICES ADMINISTRATION
	WHITE JACQULYN E	B	F	37	AD01	03	D	FISCAL TECHNICIAN I	7/2/88	01	FINANCIAL ACCOUNTING
	WILLIAMS ROMONA C	B	F	33	AD01	03	D	FISCAL TECHNICIAN I	10/12/91	01	KIRKLAND CORRECTIONAL INSTITUTION
	BROWNHEIM BARBARA L	W	F	41	AD01	03	D	FISCAL TECHNICIAN I	7/7/95	01	FINANCIAL ACCOUNTING
	WILLIAMS BEVERLY W	W	F	46	AD01	03	D	FISCAL TECHNICIAN I	9/17/97	01	FINANCIAL ACCOUNTING
1	BOUKNIGHT DEBBIE	B	F	46	AD01	03	D	FISCAL TECHNICIAN I	2/28/98	01	CORR INDUSTRIES ADMIN
	HALL GLORIA V	B	F	43	AD01	03	D	FISCAL TECHNICIAN I	4/4/98	01	FINANCIAL ACCOUNTING
	PURE TRACY S	B	F	28	AD01	03	D	FISCAL TECHNICIAN I	5/8/98	01	FINANCIAL ACCOUNTING
1	PERKINS VERLENE E	W	F	58	AD01	03	D	FISCAL TECHNICIAN I	6/5/98	01	CORR INDUSTRIES ADMIN
3	SMALL TAMMY V	B	F	41	AD01	03	D	FISCAL TECHNICIAN I	6/7/98	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
3	ENSMAN JEANNIE C	W	F	45	AD01	03	D	FISCAL TECHNICIAN I	5/15/99	01	FINANCIAL ACCOUNTING
	TOTAL POSITIONS ELIMINATED 2										
	KRAMER MARTHA L	W	F	55	AD12	06	D	AUDITOR IV	9/27/90	01	DIVISION OF INTERNAL AUDITS
	MORGAN JOHN P	W	M	41	AD12	06	D	AUDITOR IV	10/16/92	01	DIVISION OF INTERNAL AUDITS
123	BOWERS DAVID C	W	M	58	AD12	06	D	AUDITOR IV	11/27/92	01	DIV OF INTERNAL AUDITS
	HUDDLE III CHARLES E	W	M	43	AD10	05	D	AUDITOR III	7/8/82	01	CANTEEN WHSE INVENTORY/DISTRIBUTION
	SHEPARD LARRY T	W	M	53	AD10	05	D	AUDITOR III	10/13/83	01	CANTEEN WHSE INVENTORY/DISTRIBUTION
13	HAYES LORETTA G	B	F	31	AD08	04	D	AUDITOR II	8/10/98	01	DIV OF INTERNAL AUDITS
	TOTAL POSITIONS ELIMINATED 2										
13	KENDALL JOHNNY E	W	M	51	AD18	08	E	AUDITS MANAGER II	4/17/98	01	DIV OF INTERNAL AUDITS
13	HOLTON GLENN S	W	M	42	AD15	07	E	AUDITS MANAGER I	12/10/87	01	DIV OF INTERNAL AUDITS
	TOTAL POSITIONS ELIMINATED 2										
1	HARRISON RICKIE	B	M	46	AH20	07	B	ADMINISTRATIVE MGR I	5/6/77	01	DIV OF INSPECT OPER REVIEW DRUG TES
	DIEHL JOHN BRYANT	W	M	51	AH20	07	B	ADMINISTRATIVE MGR I	6/2/77	01	CANTEEN WHSE INVENTORY/DISTRIBUTION
	VAUGHN WILLIAM J	W	M	62	AH20	07	E	ADMINISTRATIVE MGR I	5/7/82	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
	PAGE JAMES EDWIN	W	M	43	AH20	07	C	ADMINISTRATIVE MGR I	9/3/83	01	BEHAVIORAL MEDICINE DIVISION
	MCQUEEN THOMAS EDGAR	W	M	52	AH20	07	E	ADMINISTRATIVE MGR I	10/19/85	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
	GRAY ISAIAH	B	M	39	AH20	07	C	ADMINISTRATIVE MGR I	2/20/87	01	VEHICLE COMMUNICATION MANAGEMENT
	JEWELL TONJA M	W	F	42	AH20	07	D	ADMINISTRATIVE MGR I	3/19/87	01	FOOD SER WHSE INVENTORY/DISTRIBUTION
	POSTON JEFF	W	M	40	AH20	07	A	ADMINISTRATIVE MGR I	6/19/92	01	CONSTRUCTION ADMINISTRATION
	KING JR JOHN W	W	M	56	AH20	07	A	ADMINISTRATIVE MGR I	12/16/93	01	COMMISSARY WHSE INVENTORY/DISTRIBUTION
3	KINNEY KENNETH M	B	M	49	AH20	07	B	ADMINISTRATIVE MGR I	8/4/95	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
	TOTAL POSITIONS ELIMINATED 1										
	JOHNSON ANNA K	W	F	57	AH40	06	B	PROGRAM COORDINATOR II	8/28/70	01	DIVISION OF INMATE SERVICES
	RITCHIE SUSAN F	W	F	57	AH40	06	C	PROGRAM COORDINATOR II	4/22/72	01	DIV OF CLASSIFICATION & INMATE RECORD
	DANTZLER DON H	B	M	52	AH40	06	D	PROGRAM COORDINATOR II	3/17/73	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
	STOBBE MICHAEL J	W	M	50	AH40	06	E	PROGRAM COORDINATOR II	5/30/75	01	DIV OF CLASSIFICATION & INMATE RECORD
	KOON BARBARA R	W	F	55	AH40	06	E	PROGRAM COORDINATOR II	10/12/75	01	DIV OF CLASSIFICATION & INMATE RECORD

SEE A LIST OF EMPLOYEES ELIGIBLE FOR BUMPING IN EACH COMPETITIVE AREA

R I F 123	EMPLOYEE NAME	RACE	SEX	AGE	CLASS JAS	BAND	LEVEL	CLASSIFICATION TITLE	RIF SVC DATE	CAR OME PA	LOCATION
1	RAINEY PATRICIA A	B	F	46	AH40	06	C	PROGRAM COORDINATOR II	1/15/77	01	DIV OF CLASS & INMATE RECDS
	MATHEWS MICHAEL R	B	M	48	AH40	06	C	PROGRAM COORDINATOR II	2/20/77	01	DIV OF CLASSIFICATION & INMATE RECORD
	CANNON RICHARD L	B	M	47	AH40	06	E	PROGRAM COORDINATOR II	6/11/77	01	MANNING CORRECTIONAL INSTITUTION
	TOWNSEND HARRY EDWARD	W	M	42	AH40	06	E	PROGRAM COORDINATOR II	8/3/79	01	CAMILLE GRAHAM CORRECTIONAL INST
	CRISP DAVID E	W	M	48	AH40	06	C	PROGRAM COORDINATOR II	2/4/81	01	DIV OF CLASSIFICATION & INMATE RECORD
	LORICK III LAWRENCE T	W	M	44	AH40	06	D	PROGRAM COORDINATOR II	5/9/81	01	DIVISION OF BUDGET AND FINANCE
	POOLE DORIS P	B	F	43	AH40	06	C	PROGRAM COORDINATOR II	7/5/81	01	DIV OF CLASSIFICATION & INMATE RECORD
	MANGUM ASHLEY D	W	M	60	AH40	06	A	PROGRAM COORDINATOR II	9/8/81	01	FOOD SER WHSE INVENTORY/DISTRIBUTION
	SAS NICHOLAS M	W	M	45	AH40	06	C	PROGRAM COORDINATOR II	9/19/81	01	CAMPBELL PRE RELEASE CENTER
	STEVENSON III ROBERT M	W	M	43	AH40	06	E	PROGRAM COORDINATOR II	9/26/81	01	KIRKLAND CORRECTIONAL INSTITUTION
	LEAKS STANLEY BH	B	M	42	AH40	06	C	PROGRAM COORDINATOR II	11/7/81	01	WATKINS PRE RELEASE CENTER
	WEEDON KENNETH B	B	M	49	AH40	06	E	PROGRAM COORDINATOR II	6/13/82	01	GOODMAN CORRECTIONAL INSTITUTION
	PATTERSON DENNIS R	B	M	40	AH40	06	E	PROGRAM COORDINATOR II	1/7/83	01	DIV OF CLASSIFICATION & INMATE RECORD
	ROBINSON ELAINE C	B	F	45	AH40	06	E	PROGRAM COORDINATOR II	2/2/83	01	STEVENSON CORRECTIONAL INSTITUTION
	LYBRAND ELIZABETH B	W	F	44	AH40	06	D	PROGRAM COORDINATOR II	2/12/83	01	DIVISION OF INMATE SERVICES
	MATHIS LINDA W	W	F	43	AH40	06	A	PROGRAM COORDINATOR II	4/1/83	01	DIVISION OF BUDGET AND FINANCE
	KNOWLIN SANDRA M	B	F	40	AH40	06	C	PROGRAM COORDINATOR II	1/27/84	01	DIV OF CLASSIFICATION & INMATE RECORD
1	SMITH TESSIE A	B	F	42	AH40	06	E	PROGRAM COORDINATOR II	5/18/84	01	OPERATION REVIEW
	COUNTS MONICA A	W	F	40	AH40	06	C	PROGRAM COORDINATOR II	9/15/84	01	DIV OF CLASSIFICATION & INMATE RECORD
	HOUSTON ARTHUR E	B	M	40	AH40	06	C	PROGRAM COORDINATOR II	11/17/84	01	DIV OF CLASSIFICATION & INMATE RECORD
	MCCALL JR DAVID M	W	M	38	AH40	06	C	PROGRAM COORDINATOR II	12/1/84	01	KIRKLAND CORRECTIONAL INSTITUTION
1	MIMS CYNTHIA E	W	F	51	AH40	06	E	PROGRAM COORDINATOR II	12/2/84	01	OPERATION REVIEW
1	CROMER PERNELL	B	M	41	AH40	06	C	PROGRAM COORDINATOR II	1/14/85	01	DIV OF CLASS & INMATE RECDS
	LARDEN JOHN P	B	M	55	AH40	06	B	PROGRAM COORDINATOR II	1/25/85	01	COMMISSARY WHSE INVENTORY/DISTRIBUTION
1	COLEMAN MARY E	W	F	47	AH40	06	E	PROGRAM COORDINATOR II	4/24/85	01	OPERATION REVIEW
	THOMPSON ANDREA R	B	F	39	AH40	06	C	PROGRAM COORDINATOR II	7/20/85	01	DIV OF CLASSIFICATION & INMATE RECORD
	GLYMPH DELORIS M	B	F	50	AH40	06	E	PROGRAM COORDINATOR II	7/18/86	01	YOUNG OFFENDER DIVISION
	TURBEVILLE LYNN F	W	F	57	AH40	06	C	PROGRAM COORDINATOR II	7/20/86	01	DIV OF CLASSIFICATION & INMATE RECORD
	BURCKHALTER PHILIP G	W	M	51	AH40	06	E	PROGRAM COORDINATOR II	2/12/88	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
	PATTERSON SHARON A	B	F	38	AH40	06	C	PROGRAM COORDINATOR II	2/12/88	01	DIV OF CLASSIFICATION & INMATE RECORD
2	BAXLEY TRACIE B	O	F	44	AH40	06	D	PROGRAM COORDINATOR II	6/25/88	01	INMATE GRIEVANCE BRANCH
2	BRENNAN JR JAMES E	W	M	54	AH40	06	C	PROGRAM COORDINATOR II	5/18/90	01	DIV OF CLASSIFICATION & INMATE RECORD
2	BROWN MARVIN A	B	M	44	AH40	06	E	PROGRAM COORDINATOR II	9/13/90	01	DIV OF CLASSIFICATION & INMATE RECORD
2	CAMPBELL ROBERT L	W	M	56	AH40	06	B	PROGRAM COORDINATOR II	5/2/93	01	BEHAVIORAL MEDICINE DIVISION
12	EDGE KELLY R	W	F	40	AH40	06	E	PROGRAM COORDINATOR II	7/9/93	01	OPERATION REVIEW
12	WITHERSPOON LAVERN	B	M	48	AH40	06	C	PROGRAM COORDINATOR II	10/10/93	01	BROAD RIVER
123	ESLICK LONNIE J	W	M	60	AH40	06	E	PROGRAM COORDINATOR II	9/3/94	01	SECURITY DIVISION
123	CAMPBELL JENNIFER L	W	F	32	AH40	06	B	PROGRAM COORDINATOR II	9/29/96	01	YOUNG OFFENDER DIV
23	PERRY KEISHA L	B	F	33	AH40	06	B	PROGRAM COORDINATOR II	12/1/96	01	SUBSTANCE ABUSE SVCS DIV
	THOMAS MARY A	B	F	61	AH35	05	B	PROGRAM COORDINATOR I	3/15/73	01	BROAD RIVER CORRECTIONAL INSTITUTION
	WOOD DARRELL H	W	M	47	AH35	05	D	PROGRAM COORDINATOR I	1/23/75	01	MANNING CORRECTIONAL INSTITUTION
	WEED LOREENE H	W	F	60	AH35	05	A	PROGRAM COORDINATOR I	9/14/76	01	DIV OF CLASSIFICATION & INMATE RECORD
	ROGERS HARRY	B	M	52	AH35	05	C	PROGRAM COORDINATOR I	4/8/78	01	KIRKLAND CORRECTIONAL INSTITUTION
	SEABROOK GLORIA	B	F	51	AH35	05	E	PROGRAM COORDINATOR I	4/27/79	01	WATKINS PRE RELEASE CENTER

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POS OF SC NG ELIMINATED AND EMPLOYEES ELIGIBLE FOR BUMPING IN EACH COMPET VE AREA

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R I F 123		EMPLOYEE NAME	RACE	SEX	AGE	CLASS JOB	GRADE	STEP	CLASSIFICATION TITLE	RIF SVC DATE	CAREER PA	LOCATION
		SMITH RAYMOND	W	M	61	AH35	05	E	PROGRAM COORDINATOR I	7/16/80	01	MANNING CORRECTIONAL INSTITUTION
		ROSE MARSHALL	B	F	44	AH35	05	B	PROGRAM COORDINATOR I	3/18/81	01	KIRKLAND CORRECTIONAL INSTITUTION
		METTS THOMAS A	W	M	56	AH35	05	E	PROGRAM COORDINATOR I	5/21/81	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		BUFF SUSAN R	W	F	50	AH35	05	C	PROGRAM COORDINATOR I	9/26/82	01	DIV OF CLASSIFICATION & INMATE RECORD
		DIRUSSO KEITH J	W	M	39	AH35	05	E	PROGRAM COORDINATOR I	3/3/84	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
1		FERGUSON SHARON J	B	F	49	AH35	05	E	PROGRAM COORDINATOR I	3/13/84	01	DIV OF CLASS & INMATE RECDS
		ROWE DEBORAH L	W	F	50	AH35	05	E	PROGRAM COORDINATOR I	5/5/84	01	DEPUTY DIRECTOR ADMINISTRATION
		ROLACK CAROLINE A	B	F	48	AH35	05	C	PROGRAM COORDINATOR I	5/12/84	01	DIV OF CLASSIFICATION & INMATE RECORD
		WILSON DENNIS L	W	M	53	AH35	05	D	PROGRAM COORDINATOR I	8/17/84	01	KIRKLAND CORRECTIONAL INSTITUTION
		WILLIS STEPHANIE	B	F	38	AH35	05	B	PROGRAM COORDINATOR I	10/13/84	01	MANNING CORRECTIONAL INSTITUTION
		WISE VICKIE M	B	F	37	AH35	05	E	PROGRAM COORDINATOR I	11/2/84	01	DIVISION OF POLICY DEVELOPMENT
1		MARTIN ODESSA	B	F	38	AH35	05	C	PROGRAM COORDINATOR I	12/9/84	01	OFFICE OF EXEC AFFAIRS
		HOWDESHELL THELMA S	W	F	47	AH35	05	C	PROGRAM COORDINATOR I	7/25/85	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		TISON JULIA K	W	F	52	AH35	05	E	PROGRAM COORDINATOR I	1/4/86	01	DIV OF CLASSIFICATION & INMATE RECORD
		KIRSCH THOMAS E	W	M	53	AH35	05	D	PROGRAM COORDINATOR I	5/22/86	01	FOOD PROCESSING PLANT
		VAN BORSCH DONALD	W	M	49	AH35	05	B	PROGRAM COORDINATOR I	6/12/87	01	WALDEN FARM OPER
		ADAMS JENEANN W	W	F	48	AH35	05	C	PROGRAM COORDINATOR I	7/9/88	01	CAMILLE GRAHAM CORRECTIONAL INST
		SMALL SHARON COHEN	B	F	36	AH35	05	C	PROGRAM COORDINATOR I	7/9/88	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		WATTS MONICA B	B	F	33	AH35	05	B	PROGRAM COORDINATOR I	3/25/89	01	YOUNG OFFENDER DIVISION
		FOX CLONTA S	W	M	37	AH35	05	C	PROGRAM COORDINATOR I	4/13/91	01	DIV OF CLASSIFICATION & INMATE RECORD
		GRIFFITH JOHN B	B	M	52	AH35	05	B	PROGRAM COORDINATOR I	10/18/91	01	WALDEN FARM OPER
		QUILLER PORTIA M	B	F	43	AH35	05	E	PROGRAM COORDINATOR I	2/8/92	01	VICTIM SERVICES DIVISION
		BARKLEY JOHN G	W	M	41	AH35	05	E	PROGRAM COORDINATOR I	2/8/93	01	MANNING CORRECTIONAL INSTITUTION
		BROOKS CAROL B	W	F	48	AH35	05	C	PROGRAM COORDINATOR I	4/3/93	01	DIV OF CLASSIFICATION & INMATE RECORD
3		ROWE ERNEST E	B	M	37	AH35	05	C	PROGRAM COORDINATOR I	12/11/93	01	DIV OF CLASSIFICATION & INMATE RECORD
3		MODZELEWSKI JOSEPH R	W	M	65	AH35	05	C	PROGRAM COORDINATOR I	3/11/94	01	DIV OF CLASSIFICATION & INMATE RECORD
3		HOLMES OLIVER L	B	M	65	AH35	05	A	PROGRAM COORDINATOR I	10/14/94	01	SUPPORT SERVICES ADMINISTRATION
3		HURT STACEY A	W	F	26	AH35	05	C	PROGRAM COORDINATOR I	11/13/94	01	SAFETY/FIRE INSPECTIONS DIVISION
3		MULLIS VANN S	W	M	57	AH35	05	C	PROGRAM COORDINATOR I	9/2/97	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
3		TAYLOR SHIRLIE T	W	F	57	AH35	05	C	PROGRAM COORDINATOR I	5/22/98	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
3		STANLEY WILLIAM R	W	M	25	AH35	05	C	PROGRAM COORDINATOR I	9/2/98	01	VICTIM SERVICES DIVISION
3		COBB JR LUCIUS D	W	M	32	AH35	05	C	PROGRAM COORDINATOR I	6/5/99	01	CORRECTIONAL INDUSTRIES ADMINISTRATION
		TOTAL POSITIONS ELIMINATED 11										
		TAYLOR JR BLAKE E	W	M	57	AH45	07	E	PROGRAM MANAGER I	7/1/67	01	DIV OF INSPECT OPER REVIEW DRUG TES
		BROWN SAMMIE D	W	F	59	AH45	07	B	PROGRAM MANAGER I	8/16/70	01	DEPUTY DIRECTOR PROGRAM SERVICES
		KELLY DEBORAH B	W	F	47	AH45	07	E	PROGRAM MANAGER I	1/5/75	01	DIV OF MEDICAL & PROF HEALTH SVCS
		KAWAGUCHI LAURA H	W	F	49	AH45	07	B	PROGRAM MANAGER I	5/30/75	01	DIV OF CLASSIFICATION & INMATE RECORD
		SCARBOROUGH JOETTE D	B	F	47	AH45	07	B	PROGRAM MANAGER I	5/14/77	01	DIV OF CLASSIFICATION & INMATE RECORD
		DUNLAP LINDA J	W	F	53	AH45	07	E	PROGRAM MANAGER I	2/9/79	01	DIV OF MEDICAL & PROF HEALTH SVCS
		ROCHESTER NELLIE M	W	F	54	AH45	07	E	PROGRAM MANAGER I	8/26/82	01	DIV OF MEDICAL & PROF HEALTH SVCS
		MITCHELL JOSEPHINE L	B	F	45	AH45	07	D	PROGRAM MANAGER I	9/18/82	01	BEHAVIORAL MEDICINE DIVISION
		RILEY TIMOTHY	W	M	42	AH45	07	B	PROGRAM MANAGER I	6/2/84	01	KIRKLAND CORRECTIONAL INSTITUTION
		MONTGOMERY SUSAN A	W	F	52	AH45	07	B	PROGRAM MANAGER I	11/26/84	01	OFFICE OF EXECUTIVE AFFAIRS
		VOGT LE ANN M	W	F	46	AH45	07	A	PROGRAM MANAGER I	9/17/87	01	KIRKLAND CORRECTIONAL INSTITUTION

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FOR OHS BEING ELIMINATED AND EMPLOYEES ELIGIBLE FOR BUMPING IN EACH COMPETITIVE AREA

R I F 123		EMPLOYEE NAME	RACE	SEX	AGE	CLASS TITLE	LEVEL	STEP	CLASSIFICATION TITLE	RIF SVC DATE	CAREER PROGRAM	LOCATION
		RECK STEVEN J	W	M	53	AH45	07	A	PROGRAM MANAGER I	8/4/88	01	FOOD SERVICES ADMINISTRATION
		CLARK JOHN R	W	M	61	AH45	07	C	PROGRAM MANAGER I	8/10/89	01	DIVISION OF HUMAN RESOURCES
		SWEIGART LES G	W	M	59	AH45	07	D	PROGRAM MANAGER I	8/24/90	01	SUPPORT SERVICES ADMINISTRATION
		CONNELLY YVONNE T	W	F	54	AH45	07	E	PROGRAM MANAGER I	11/17/90	01	DIV OF MEDICAL & PROF HEALTH SVCS
		DEW JR HERBERT O	W	M	52	AH45	07	D	PROGRAM MANAGER I	10/10/91	01	AGRICULTURE SERVICES
		POWELL KATHLEEN F	B	F	51	AH45	07	E	PROGRAM MANAGER I	5/16/92	01	BEHAVIORAL MEDICINE DIVISION
13		SHULER THOMAS A	B	M	50	AH45	07	C	PROGRAM MANAGER I	9/11/93	01	SUBSTANCE ABUSE SVCS DIV
	R1	ELLISOR SHARON E	W	F	39	AH45	07	D	PROGRAM MANAGER I	5/4/95	01	CONSTRUCTION ADMINISTRATION
	R1	CRAIG PAMELA R	B	F	54	AH45	07	E	PROGRAM MANAGER I	12/30/95	01	SAFETY/FIRE INSPECTIONS DIVISION
		TOTAL POSITIONS ELIMINATED 1										
		SMITH ALBERT R	W	M	54	AJ45	06	E	INFO RESOURCE CONSULT II	5/9/86	01	NETWORK & TELE COMM
1		HOOKER SR GARY A	W	M	54	AJ45	06	E	INFO RESOURCE CONSULT II	6/5/93	01	NETWORK & TELE COMM
		BOVE FRED C	W	M	33	AJ45	06	B	INFO RESOURCE CONSULT II	4/3/98	01	NETWORK & TELE COMM
3		STOTTS DARRELL J	W	M	48	AJ45	06	B	INFO RESOURCE CONSULT II	5/7/02	01	CORRECTIONAL INDUSTRIES
		TOTAL POSITIONS ELIMINATED 1										
		STEVENS KAREN L.	W	F	43	AJ40	04	A	COMPUTER OPERATOR II	2/8/91	01	SYSTEMS OPER & SUPPORT
		ANDERSON SHIRLEY W	B	M	59	AJ40	04	A	COMPUTER OPERATOR II	6/20/92	01	SYSTEM OPER & SUPPORT
13		JOHNSON RICHMOND A	B	M	53	AJ40	04	A	COMPUTER OPERATOR II	3/22/98	01	SYSTEM OPER & SUPPORT
		TOTAL POSITIONS ELIMINATED 1										
13		ROBINSON KAY	B	F	37	BC30	06	D	PUBLIC INFOR DIR I	10/16/98	01	OFF OF COMMUNICATIONS
		TOTAL POSITIONS ELIMINATED 1										
13		BATES LEE CHERYL A	B	F	44	BC50	08	A	DIR INFORMATION SVCS	7/16/93	01	OFF OF COMMUNICATIONS
		TOTAL POSITIONS ELIMINATED 1										
		SUMMERS JOHN W	B	M	52	EB52	09	A	DENTIST	3/11/80	01	BROAD RIVER CORRECTIONAL INSTITUTION
		GILLIAM MEDRINA J	B	F	43	EB52	09	C	DENTIST	5/13/89	01	DEPUTY DIR FOR MED & PROF HEALTH SERV
		MCPHERSON DOUGLAS W	W	M	49	EB52	09	A	DENTIST	3/13/92	01	KIRKLAND CORRECTIONAL INSTITUTION
		MINCER EUGENE	B	M	54	EB52	09	A	DENTIST	3/8/95	01	DIV OF MEDICAL & PROF HEALTH SVCS
13		STEIN SAUNDRA G	W	F	48	EB52	09	A	DENTIST	5/24/96	01	CAMILLE GRAHAM
		TOTAL POSITIONS ELIMINATED 1										
		ROBINSON HESTER	B	F	53	EC10	02	C	MED ASST TECH I	4/20/79	01	BROAD RIVER CORR INST
		GILYARD JEAN F	B	F	54	EC10	02	C	MED ASST TECH I	6/15/79	01	CAMILLE GRAHAM CORR. INST
		WRIGHT MARGARET	B	F	43	EC10	02	C	MED ASST TECH I	2/1/98	01	KIRKLAND CORR INST
13		IRVIN MILLICENT M	B	F	32	EC10	02	C	MED ASST TECH I	5/15/98	01	DIV OF MED & PROF SVCS
	R2	BENDER MARY	B	F	38	EC10	02	C	MED ASST TECH I	9/2/98	01	CAMILLE GRAHAM CORR INST
	R2	EVANS KATRINA L	B	F	35	EC10	02	C	MED ASST TECH I	9/17/00	01	BEHAVIORAL MEDICINE DIVISION
	R2	ROBINSON LOLITTA V	B	F	27	EC10	02	C	MED ASST TECH I	2/20/01	01	KIRKLAND CORR INST
	R2	RICHARDSON KATHLEE	B	F	48	EC10	02	C	MED ASST TECH I	8/17/01	01	CAMILLE GRAHAM CORR INST
	P R2	IJAJA, MARY L.	B	F	45	EC10	02	C	MED ASST TECH I	6/3/02	01	KIRKLAND CORR. INST
	P R2	TINNEL JOYCE E	W	F	54	EC10	02	C	MED ASST TECH I	7/22/02	01	KIRKLAND CORR INST
	P R2	GILL YOLANDO	B	F	41	EC10	02	C	MED ASST TECH I	8/12/02	01	KIRKLAND CORR INST
	P R2	HICKS ANGELA J	B	F	29	EC10	02	C	MED ASST TECH I	9/1/02	01	KIRKLAND CORR INST
	P R2	GARDENER PATRICIA	B	F	37	EC10	02	C	MED ASST TECH I	12/23/02	01	CAMILLE GRAHAM CORR INST
		TOTAL POSITIONS ELIMINATED 1										

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L J A O S B S	B A N D	L E V L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		DUCK MARGARET H	W	F	58	EC25	05	A	TECHNICAL MEDICAL ASSOS II	10/7/94	01	DIV OF MED & PROF SVCS
13		TINDER MELISSA G	W	F	35	EC25	05	A	TECHNICAL MEDICAL ASSOS II	2/14/99	01	DIV OF MED & PROF SVCS
		TOTAL POSITIONS ELIMINATED 1										
		WILSON ANNIE S	B	F	54	GA40	04	E	HUMAN SERVICES SPEC II	5/30/75	01	GOODMAN CORRECTIONAL INSTITUTION
		JOHNSON ARLENE	B	F	49	GA40	04	C	HUMAN SERVICES SPEC II	1/30/76	01	GOODMAN CORRECTIONAL INSTITUTION
		WRIGHT RICHARD L	W	M	57	GA40	04	C	HUMAN SERVICES SPEC II	5/16/80	01	CAMPBELL PRE RELEASE CENTER
		HARRELL DONALD B	B	M	41	GA40	04	B	HUMAN SERVICES SPEC II	5/29/82	01	WATKINS PRE RELEASE CENTER
		WALTZ DONALD R	W	M	36	GA40	04	A	HUMAN SERVICES SPEC II	8/24/85	01	DIV OF CLASSIFICATION & INMATE RECORD
		MCKIE KENNETH	B	M	44	GA40	04	C	HUMAN SERVICES SPEC II	9/14/85	01	WATKINS PRE RELEASE CENTER
		JEFFERSON JANIE E M	B	F	59	GA40	04	B	HUMAN SERVICES SPEC II	10/30/87	01	WATKINS PRE RELEASE CENTER
		THOMAS BETTY JEAN	B	F	48	GA40	04	A	HUMAN SERVICES SPEC II	12/8/89	01	DIV OF CLASSIFICATION & INMATE RECORD
		RIDGES ANTHONY R	B	M	33	GA40	04	A	HUMAN SERVICES SPEC II	8/7/92	01	DIV OF CLASSIFICATION & INMATE RECORD
		ROGERS CHARLES E	W	M	46	GA40	04	A	HUMAN SERVICES SPEC II	4/17/93	01	DIV OF CLASSIFICATION & INMATE RECORD
		JONES VALERIE C	B	F	40	GA40	04	A	HUMAN SERVICES SPEC II	4/20/97	01	DIV OF CLASSIFICATION & INMATE RECORD
1		GEDDIS VALETA A	B	F	31	GA40	04	B	HUMAN SERVICES SPEC II	6/17/97	01	GOODMAN CORR INST
		ARMSTRONG JEROME K	B	M	46	GA40	04	A	HUMAN SERVICES SPEC II	7/19/97	01	DIV OF CLASSIFICATION & INMATE RECORD
		PRATT ANNIE M	B	F	49	GA40	04	C	HUMAN SERVICES SPEC II	11/8/97	01	GOODMAN CORRECTIONAL INSTITUTION
		NICKS TRICIA A	W	F	33	GA40	04	E	HUMAN SERVICES SPEC II	11/13/98	01	GOODMAN CORRECTIONAL INSTITUTION
	P	MCKNIGHT ALICIA D	B	F	36	GA40	04	A	HUMAN SERVICES SPEC II	7/29/02	01	BEHAVIORAL MEDICINE DIVISION
3	P	CARAWAY MARY E	B	F	30	GA40	04	A	HUMAN SERVICES SPEC II	8/26/02	01	BEHAVIORAL MEDICINE DIVISION
		TOTAL POSITIONS ELIMINATED 1										
		SHAW ERNEST	B	M	52	GA60	06	D	HUMAN SERVICES COORD II	5/3/73	01	BEHAVIORAL MEDICINE DIVISION
		WEEKS REAVER MAE	B	F	50	GA60	06	A	HUMAN SERVICES COORD II	4/13/79	01	STEVENSON CORRECTIONAL INSTITUTION
		MCMILLAN ALTON L	B	M	55	GA60	06	B	HUMAN SERVICES COORD II	5/6/83	01	BEHAVIORAL MEDICINE DIVISION
		WALTON GEORGE L	B	M	47	GA60	06	B	HUMAN SERVICES COORD II	2/3/84	01	BROAD RIVER CORRECTIONAL INSTITUTION
		MICKENS BRENDA G	B	F	51	GA60	06	D	HUMAN SERVICES COORD II	1/5/85	01	BEHAVIORAL MEDICINE DIVISION
		OBERMAN BRUCE H	W	M	42	GA60	06	B	HUMAN SERVICES COORD II	6/2/85	01	BEHAVIORAL MEDICINE DIVISION
		HASTY BARBARA A	W	F	54	GA60	06	C	HUMAN SERVICES COORD II	8/28/85	01	BROAD RIVER CORRECTIONAL INSTITUTION
		MOORE KEVIN	B	M	44	GA60	06	B	HUMAN SERVICES COORD II	10/1/88	01	KIRKLAND CORRECTIONAL INSTITUTION
		DWYER ANN M	W	F	39	GA60	06	D	HUMAN SERVICES COORD II	11/2/90	01	BEHAVIORAL MEDICINE DIVISION
		SMITH SARAH A	B	F	60	GA60	06	B	HUMAN SERVICES COORD II	2/21/93	01	BEHAVIORAL MEDICINE DIVISION
1		SHATTUCK ROBERT W	W	M	58	GA60	06	B	HUMAN SERVICES COORD II	7/10/93	01	SUBSTANCE ABUSE SVCS DIV
		RYDER GARY H	W	M	55	GA60	06	B	HUMAN SERVICES CQORD II	8/7/93	01	BEHAVIORAL MEDICINE DIVISION
		FLOWERS STANLEY R	B	M	42	GA60	06	B	HUMAN SERVICES COORD II	4/22/94	01	STEVENSON CORRECTIONAL INSTITUTION
		ELLER MARGARET D	W	F	47	GA60	06	C	HUMAN SERVICES COORD II	1/27/96	01	DIVISION OF INMATE SERVICES
		MYERS KENNETH E SR	B	M	49	GA60	06	B	HUMAN SERVICES COORD II	2/2/96	01	KIRKLAND CORRECTIONAL INSTITUTION
		ADEDOKUN DORCAS I	B	F	52	GA60	06	B	HUMAN SERVICES COORD II	4/19/96	01	GOODMAN CORRECTIONAL INSTITUTION
		HOLMES WILLIE B	B	M	54	GA60	06	A	HUMAN SERVICES COORD II	3/21/97	01	WATKINS PRE RELEASE CENTER
2		GORDON STEPHANIE T	B	F	40	GA60	06	B	HUMAN SERVICES COORD II	10/25/97	01	CAMILLE GRAHAM CORRECTIONAL INST
		JAMES THOMAS E	B	M	55	GA50	05	D	HUMAN SERVICES COORD I	6/30/73	01	BROAD RIVER CORRECTIONAL INSTITUTION
		PRICE CHRISTINE H	A	F	53	GA50	05	D	HUMAN SERVICES COORD I	9/6/75	01	CAMILLE GRAHAM CORRECTIONAL INST
		CANTEY JR LAWRENCE	B	M	45	GA50	05	E	HUMAN SERVICES COORD I	3/10/77	01	BROAD RIVER CORRECTIONAL INSTITUTION
		WADFORD PAMELLA	W	F	43	GA50	05	E	HUMAN SERVICES COORD I	5/29/81	01	BEHAVIORAL MEDICINE DIVISION
		MONTGOMERY ELOUISE J	B	F	46	GA50	05	D	HUMAN SERVICES COORD I	1/8/83	01	MANNING CORRECTIONAL INSTITUTION

AREA OF PROTECTION ELIGIBLE FOR BUMPING IN EACH COMPETITIVE AREA

R I F 123	EMPLOYEE NAME	RACE	SEX	AGE	CLASS JOBS	CLASS AUDS	CLASS LEVL	CLASSIFICATION TITLE	RIF SVC DATE	CAR MER PAY	LOCATION
	DOWNING MARIAN Y	B	F	47	GA50	05	D	HUMAN SERVICES COORD I	6/17/83	01	GOODMAN CORRECTIONAL INSTITUTION
	BOWIE SANDRA S	W	F	49	GA50	05	C	HUMAN SERVICES COORD I	11/17/84	01	INMATE GRIEVANCE BRANCH
	GRAY EDWARD M	B	M	49	GA50	05	D	HUMAN SERVICES COORD I	3/2/85	01	BROAD RIVER CORRECTIONAL INSTITUTION
1	SMITH DENNIS O	B	M	44	GA50	05	D	HUMAN SERVICES COORD I	4/6/85	01	YOUNG OFFENDER DIV
	LAWSON JAMES G	W	M	60	GA50	05	E	HUMAN SERVICES COORD I	4/21/85	01	BEHAVIORAL MEDICINE DIVISION
	BROWN BARBARA A	B	F	52	GA50	05	A	HUMAN SERVICES COORD I	5/18/85	01	GOODMAN CORRECTIONAL INSTITUTION
	SIMMONS III JAMES	B	M	38	GA50	05	C	HUMAN SERVICES COORD I	7/1/85	01	INMATE GRIEVANCE BRANCH
	HANCOCK ROBIN A	B	F	40	GA50	05	A	HUMAN SERVICES COORD I	8/24/85	01	BEHAVIORAL MEDICINE DIVISION
	FAIR PAULETTE G	B	F	46	GA50	05	D	HUMAN SERVICES COORD I	11/16/85	01	BROAD RIVER CORRECTIONAL INSTITUTION
	HOLLIDAY CLYDE	B	M	53	GA50	05	D	HUMAN SERVICES COORD I	4/18/86	01	CAMILLE GRAHAM CORRECTIONAL INST
	SPROTT ESTHER W	W	F	66	GA50	05	C	HUMAN SERVICES COORD I	1/21/89	01	CAMILLE GRAHAM CORRECTIONAL INST
	MARION CELESTINE	B	F	57	GA50	05	D	HUMAN SERVICES COORD I	9/14/90	01	BROAD RIVER CORRECTIONAL INSTITUTION
	BROWN CHERYL L	B	F	33	GA50	05	A	HUMAN SERVICES COORD I	11/11/90	01	GOODMAN CORRECTIONAL INSTITUTION
	DEAS ANGELA M	B	F	32	GA50	05	D	HUMAN SERVICES COORD I	2/8/93	01	STEVENSON CORRECTIONAL INSTITUTION
	NOLES JR L GENE	W	M	34	GA50	05	C	HUMAN SERVICES COORD I	9/25/93	01	INMATE GRIEVANCE BRANCH
	CARTLEDGE LARRY	B	M	34	GA50	05	D	HUMAN SERVICES COORD I	10/23/93	01	BEHAVIORAL MEDICINE DIVISION
	CARTER PATRICK F	B	M	38	GA50	05	D	HUMAN SERVICES COORD I	10/30/93	01	CAMILLE GRAHAM CORRECTIONAL INST
	MCFADDEN JAKE W	B	M	38	GA50	05	D	HUMAN SERVICES COORD I	11/28/93	01	KIRKLAND CORRECTIONAL INSTITUTION
	BIGGER MURREL	B	M	53	GA50	05	A	HUMAN SERVICES COORD I	1/17/94	01	BEHAVIORAL MEDICINE DIVISION
	JONES JR CALVIN	B	M	34	GA50	05	D	HUMAN SERVICES COORD I	10/30/94	01	MANNING CORRECTIONAL INSTITUTION
	HUDSON BEULAH M	B	F	50	GA50	05	D	HUMAN SERVICES COORD I	3/3/95	01	BROAD RIVER CORRECTIONAL INSTITUTION
	ROBERTS TERRELL D	B	M	30	GA50	05	A	HUMAN SERVICES COORD I	5/13/95	01	BEHAVIORAL MEDICINE DIVISION
	RAMSEY RICHARD K	W	M	45	GA50	05	C	HUMAN SERVICES COORD I	7/6/95	01	BROAD RIVER CORRECTIONAL INSTITUTION
	HERRIOTT CHARLISA	B	F	30	GA50	05	D	HUMAN SERVICES COORD I	8/4/95	01	CAMILLE GRAHAM CORRECTIONAL INST
	DRAKE JAMES S	W	M	29	GA50	05	A	HUMAN SERVICES COORD I	1/20/96	01	BEHAVIORAL MEDICINE DIVISION
	DEAS ELIZABETH A	B	F	46	GA50	05	D	HUMAN SERVICES COORD I	4/6/96	01	BROAD RIVER CORRECTIONAL INSTITUTION
	PRIOLEAU BRENDA K	B	F	37	GA50	05	A	HUMAN SERVICES COORD I	4/13/96	01	BROAD RIVER CORRECTIONAL INSTITUTION
	WILLIAMS ELIZABETH G	W	F	56	GA50	05	D	HUMAN SERVICES COORD I	7/6/96	01	BROAD RIVER CORRECTIONAL INSTITUTION
	HARMAN CATHERINE A	W	F	43	GA50	05	C	HUMAN SERVICES COORD I	8/31/96	01	BEHAVIORAL MEDICINE DIVISION
	DENNIS PAUL N	B	M	28	GA50	05	A	HUMAN SERVICES COORD I	12/29/96	01	KIRKLAND CORRECTIONAL INSTITUTION
	HOLLIFIELD DEBORAH R	W	F	40	GA50	05	D	HUMAN SERVICES COORD I	6/7/97	01	BEHAVIORAL MEDICINE DIVISION
	AYCOTH COURTNEY S	W	F	34	GA50	05	D	HUMAN SERVICES COORD I	9/13/97	01	BEHAVIORAL MEDICINE DIVISION
	PEARSON SARAH M	B	F	40	GA50	05	A	HUMAN SERVICES COORD I	12/2/97	01	BEHAVIORAL MEDICINE DIVISION
	NICKENS TRACY M	B	F	35	GA50	05	D	HUMAN SERVICES COORD I	2/28/98	01	KIRKLAND CORRECTIONAL INSTITUTION
	DANNELS ROGER E	W	M	55	GA50	05	D	HUMAN SERVICES COORD I	4/5/98	01	BROAD RIVER CORRECTIONAL INSTITUTION
3	GEOHAGHAN ANGELA L	B	F	39	GA50	05	E	HUMAN SERVICES COORD I	5/1/98	01	CAMILLE GRAHAM CORRECTIONAL INST
3	SIMS QUANDA D	B	F	34	GA50	05	D	HUMAN SERVICES COORD I	8/28/98	01	KIRKLAND CORRECTIONAL INSTITUTION
13	JACKSON TAMALA J	B	F	35	GA50	05	A	HUMAN SERVICES COORD I	1/16/99	01	SUBSTANCE ABUSE SVCS DIV
	TOTAL POSITIONS ELIMINATED 3										
13	WHITTLETON CELESTINE	B	F	50	JA80	04	E	INSPECTOR II	6/1/80	01	KIRKLAND CORR INST
13	BUIE JANE	W	F	50	JA80	04	E	INSPECTOR II	1/19/85	01	GOODMAN CORR INST
13	PERRY KELVIN A	B	M	34	JA80	04	E	INSPECTOR II	6/24/89	01	STEVENSON CORR INST
13	GARRELL DEBORAH G	W	F	44	JA80	04	D	INSPECTOR II	4/14/91	01	CAMPBELL
13	COX LORIE T	W	F	40	JA80	04	D	INSPECTOR II	12/16/94	01	WATKINS PRE RELEASE CTR
13	BRINSON WILLIE E	W	M	54	JA80	04	E	INSPECTOR II	12/14/96	01	MANNING CORR INST
	TOTAL POSITIONS ELIMINATED 6										

SEE DISCLAIMER IN SECTION V OF RIF PLAN

POSITIONS NG ELIMINATED AND EMPLOYEES ELIGIBLE FOR BUMPING IN EACH COMPE VE AREA

R I F 123		EMPLOYEE NAME	R A C E	S E X	A G E	C L A S S	B A N D	L E V L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
1		THOMAS LAVENIA P	B	F	52	UB02			CERTIFIED TEACHER M	7/2/73	01	BROAD RIVER
		HUDSON PATRICIA G	B	F	51	UB02			CERTIFIED TEACHER GA	9/18/76	01	CAMILLE GRAHAM
1		MYERS MARIAM L	B	F	54	UB02			CERTIFIED TEACHER GA	9/18/76	01	GOODMAN CORR INST
1		LAKIN YVETTE	B	F	41	UB02			CERTIFIED TEACHER GA	6/3/83	01	BROAD RIVER
1		GREEN L S	W	F	53	UB02			CERTIFIED TEACHER MS	8/27/85	01	MANNING CORR INST
3		WILLIAMS CAROL C	W	F	50	UB02			CERTIFIED TEACHER MS	2/1/86	01	CAMILLE GRAHAM
1	R4	SMITH TALMADGE A	B	M	50	UB02			CERTIFIED TEACHER GA	3/14/86	01	MANNING CORR INST
13		CROXTON JEANNIE B	W	F	56	UB02			CERTIFIED TEACHER GA	5/16/86	01	MANNING CORR INST
3		RHOTEN BRENDA L	W	F	59	UB02			CERTIFIED TEACHER GA	11/8/86	01	GOODMAN CORR INST
3		MULLIS SUSAN D	W	F	54	UB02			CERTIFIED TEACHER GA	6/8/90	01	EDUCATIONAL SERVICES
13		GLENN NANCY B	W	F	52	UB02			CERTIFIED TEACHER MS	8/10/90	01	STEVENSON CORR INST
3		WILLIAMS MAGGIE L	B	F	65	UB02			CERTIFIED TEACHER GA	1/31/92	01	CAMILLE GRAHAM
1	R4	RUGER ROSE M	B	F	46	UB02			CERTIFIED TEACHER M	10/31/92	01	MANNING CORR INST
3		NEWMAN JR JAMES H	W	M	57	UB02			CERTIFIED TEACHER M	12/9/94	01	CAMILLE GRAHAM
3		BROWN GWYNEEDA	B	F	59	UB02			CERTIFIED TEACHER GA	10/13/95	01	STEVENSON CORR INST
13		MARTIN GENEVA M	W	F	59	UB02			CERTIFIED TEACHER GA	11/3/95	01	BROAD RIVER
13		MCMILLAN EUGENE M	B	M	51	UB02			CERTIFIED TEACHER GA	5/25/96	01	WALDEN CORR INST
		TOTAL POSITIONS ELIMINATED 10										
		RITCHIE GERALD B	W	M	58	UB04			VOCATIONAL TEACHER VW	3/19/77	01	CAMILLE GRAHAM
13		KING CARROLL B	W	M	65	UB04			VOCATIONAL TEACHER VH	10/24/81	01	MANNING CORR INST
13		PHILLIPS THERON M	W	M	48	UB04			VOCATIONAL TEACHER VC	11/14/81	01	WALDEN CORR INST
	R4	ROSE CAREN M	B	F	51	UB04			VOCATIONAL TEACHER VO	1/16/86	01	CAMILLE GRAHAM
13		DITTMAR WILLIAM R	W	M	53	UB04			VOCATIONAL TEACHER VA	8/28/87	01	BROAD RIVER
13		MCCLANAHAN BEVERLY M	W	F	59	UB04			VOCATIONAL TEACHER VH	12/3/88	01	BROAD RIVER
13		SHARPE EDWARD L	W	M	61	UB04			VOCATIONAL TEACHER VA	1/11/91	01	WATKINS PRE RELEASE CTR
13		DORSEY JAMES R	B	M	55	UB04			VOCATIONAL TEACHER VM	9/13/98	01	MANNING CORR INST
		TOTAL POSITIONS ELIMINATED 6										
1		VENNING JACQUELINE L	B	F	54	UB06			GUIDANCE COUNSELOR G	8/10/84	01	MANNING CORR INST
		BAILEY ELLEN S	W	F	50	UB06			GUIDANCE COUNSELOR G	10/31/85	01	STEVENSON CORR INST
3		ABRAHAM GERALDINE	B	F	43	UB06			GUIDANCE COUNSELOR G	9/19/86	01	CAMILLE GRAHAM
		TOTAL POSITIONS ELIMINATED 1										
		BLANTON WENDELL J	W	M	59	UB09			SUPT OF EDUCATION	10/18/68	01	EDUCATIONAL SERVICES
13		LABREW DELORIS	B	F	53	UE07			ACADEMIC PROGRAM MANAGER	8/28/70	01	KIRKLAND CORR. INST
13		SMITH CAROLYN M	B	F	59	UE07			ACADEMIC PROGRAM MANAGER	2/10/90	01	KIRKLAND CORR INST
	R3	SHARPE HOYT R	W	M	62	UE07			ACADEMIC PROGRAM MANAGER	1/16/92	01	EDUCATIONAL SERVICES
	R3	JACKSON KATHY C	W	F	49	UE07			ACADEMIC PROGRAM MANAGER	6/5/92	01	EDUCATIONAL SERVICES
	R3	WICKER TOMMIE E	W	F	58	UE07			ACADEMIC PROGRAM MANAGER	5/6/2002	01	EDUCATIONAL SERVICES
13		VINSON III WILLIAM D	W	M	53	UB07			PRINCIPAL	12/11/70	01	MANNING CORR INST
		TOTAL POSITIONS ELIMINATED 3										

POSITIONS E[illegible] G ELIMINATED AND EMPLOYEES ELIGIBLE FOR BUMPING IN EACH COMPET[illegible] E AREA

R I F 123		EMPLOYEE NAME	RACE	SEX	AGE	C L JOBSERIES	BAND	EVAL	CLASSIFICATION TITLE	RIF SVC DATE	CAREER PA	LOCATION
		COMPETITIVE AREA 02										
		BLACK JR RAY	W	M	41	AA50	03	A	ADMIN SPECIALIST II	4/23/88	02	PALMER PRE RELEASE CENTER
		ALFORD SHARON E	B	F	54	AA50	03	C	ADMIN SPECIALIST II	2/20/89	02	TURBEVILLE CORRECTIONAL INSTITUTION
		MONTGOMERY ROBIN	B	F	45	AA50	03	C	ADMIN SPECIALIST II	6/17/89	02	WATEREE RIVER CORRECTIONAL INSTITUTION
		GILL VENETTA J	B	F	42	AA50	03	C	ADMIN SPECIALIST II	9/27/90	02	LEE CORRECTIONAL INSTITUTION
		HARRIS SANDRA K	W	F	51	AA50	03	D	ADMIN SPECIALIST II	12/13/90	02	LEE CORRECTIONAL INSTITUTION
		MURPHY MARY A	B	F	38	AA50	03	A	ADMIN SPECIALIST II	12/13/91	02	LEE CORRECTIONAL INSTITUTION
		WINTERS ANGELA M	B	F	35	AA50	03	A	ADMIN SPECIALIST II	10/24/92	02	LEE CORRECTIONAL INSTITUTION
		WASHINGTON LISA S	B	F	29	AA50	03	A	ADMIN SPECIALIST II	1/16/93	02	TURBEVILLE CORRECTIONAL INSTITUTION
		HILTON ROSA M	B	F	38	AA50	03	A	ADMIN SPECIALIST II	4/22/94	02	LEE CORRECTIONAL INSTITUTION
		FORD LORETTA W	B	F	44	AA50	03	A	ADMIN SPECIALIST II	7/21/95	02	LEE CORRECTIONAL INSTITUTION
		BENNETT BETTY A	B	F	43	AA50	03	A	ADMIN SPECIALIST II	10/1/95	02	TURBEVILLE CORRECTIONAL INSTITUTION
		MELTON JANICE S	W	F	54	AA50	03	A	ADMIN SPECIALIST II	1/5/96	02	LEE CORRECTIONAL INSTITUTION
		WILLIAMSON GLENDA F	W	F	53	AA50	03	E	ADMIN SPECIALIST II	6/1/96	02	LEE CORRECTIONAL INSTITUTION
		BRADLEY TREVA R	B	F	32	AA50	03	A	ADMIN SPECIALIST II	11/9/96	02	TURBEVILLE CORRECTIONAL INSTITUTION
		COKER SAMANTHA M	W	F	26	AA50	03	A	ADMIN SPECIALIST II	11/16/96	02	TURBEVILLE CORRECTIONAL INSTITUTION
		WELCH CINDY Y	W	F	39	AA50	03	A	ADMIN SPECIALIST II	3/22/97	02	TURBEVILLE CORRECTIONAL INSTITUTION
		MOORE LUVIVIAN	B	F	47	AA50	03	C	ADMIN SPECIALIST II	4/3/97	02	LEE CORRECTIONAL INSTITUTION
		AUSTIN KIMBERLY H	W	F	29	AA50	03	A	ADMIN SPECIALIST II	4/25/97	02	WATEREE RIVER CORRECTIONAL INSTITUTION
		BOONE SANDRA L	W	F	41	AA50	03	A	ADMIN SPECIALIST II	12/6/97	02	LEE CORRECTIONAL INSTITUTION
		BRACEY SIMON SANDRA	B	F	42	AA50	03	A	ADMIN SPECIALIST II	1/5/98	02	LEE CORRECTIONAL INSTITUTION
		BROWN BEATRICE T	B	F	53	AA50	03	A	ADMIN SPECIALIST II	2/12/98	02	WATEREE RIVER CORRECTIONAL INSTITUTION
1		TIMMONS MARY L	W	F	65	AA50	03	A	ADMIN SPECIALIST II	9/11/98	02	LEE CORR INST
3		JOHNSON LESIA M	B	F	33	AA50	03	A	ADMIN SPECIALIST II	2/21/99	02	LEE CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
13		HAYES ROBIN P	W	F	39	JA80	04	E	INSPECTOR II	9/26/86	02	LEE CORR INST
13		BROOKS EARTHA	B	F	42	JA80	04	E	INSPECTOR II	7/12/91	02	WATEREE RIVER CORR INST
13		SILJAK KAREN L	W	F	41	JA80	04	E	INSPECTOR II	8/28/93	02	TURBEVILLE CORR INST
		TOTAL POSITIONS ELIMINATED 3										
		EDDINGS JOHN B	W	M	51	UB04			VOCATIONAL TEACHER VP	6/4/82	02	TURBEVILLE CORR INST
		STOKES BOYD E	W	M	48	UB04			VOCATIONAL TEACHER VC	8/16/91	02	LEE CORR INST
		ROGERS LEONARD P	W	M	60	UB04			VOCATIONAL TEACHER VC	7/17/93	02	TURBEVILLE CORR INST
		STOKES ROGER D	W	M	52	UB04			VOCATIONAL TEACHER VEL	1/1/94	02	LEE CORR INST
13		CORBETT JAMES L	W	M	56	UB04			VOCATIONAL TEACHER VHO	1/29/94	02	WATEREE RIVER CORR INST
13		BETTENCOURT ANTHONY M	W	M	39	UB04			VOCATIONAL TEACHER VHM	9/29/95	02	WATEREE RIVER CORR INST
13		DELOE DAVID D	W	M	44	UB04			VOCATIONAL TEACHER VW	1/5/96	02	LEE CORR INST
	R4	CAMPBELL ROBERT J	B	M	48	UB04			VOCATIONAL TEACHER VM	8/7/98	02	TURBEVILLE CORR INST
		TOTAL POSITIONS ELIMINATED 3										
1		PIERSON RUTH A	W	F	54	UB06			GUIDANCE COUNSELOR G	8/23/74	02	LEE CORR INST
3		NEWSOME MICHAEL R	W	M	51	UB06			GUIDANCE COUNSELOR G	6/8/96	02	TURBEVILLE CORR INST
		TOTAL POSITIONS ELIMINATED 1										
		BAGNAL HENRY T	W	M	53	UB07			PRINCIPAL	7/18/92	02	TURBEVILLE CORR INST
13		HAYNESWORTH ALBERTHA L	B	F	55	UB07			PRINCIPAL	9/11/93	02	WATEREE RIVER CORR INST
		TOTAL POSITIONS ELIMINATED 1										

POSITIONS BEING ELIMINATED AND EMPLOYEES ELIGIBLE FOR BUMPING IN EACH COMPETITIVE AREA

R I F 123	EMPLOYEE NAME	RACE	SEX	AGE	CLASS OSD	CL NUM	CL ALP	CLASSIFICATION TITLE	RIF SVC DATE	CAR MED PAY	LOCATION
	COMPETITIVE AREA 03										
	NONE IN THIS AREA										
	COMPETITIVE AREA 04										
	SKIPPER SUE H	W	F	53	AA75	04	A	ADMINISTRATIVE ASSISTANT	3/21/85	04	EVANS CORRECTIONAL INSTITUTION
	STUART PATRICIA A	W	F	56	AA75	04	D	ADMINISTRATIVE ASSISTANT	2/21/88	04	EVANS CORRECTIONAL INSTITUTION
	HASTY ANTONIO R	B	M	40	AA75	04	C	ADMINISTRATIVE ASSISTANT	11/12/94	04	EVANS CORRECTIONAL INSTITUTION
	JOHNSON TERRELL S	W	M	44	AA75	04	D	ADMINISTRATIVE ASSISTANT	10/21/95	04	EVANS CORRECTIONAL INSTITUTION
	SPRATTLING NATASHA C	B	F	36	AA75	04	D	ADMINISTRATIVE ASSISTANT	2/4/96	04	EVANS CORRECTIONAL INSTITUTION
13	MULLINS SHARON D	W	F	53	AA75	04	A	ADMINISTRATIVE ASSISTANT	10/17/98	04	EVANS CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	HENDLEY JAMES T	W	M	60	CD20	04	C	LIBRARY SPECIALIST	6/2/98	04	EVANS CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	MADDOX FREDDIE M	W	M	45	JA80	04	E	INSPECTOR II	8/7/86	04	EVANS CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	HUDSON MARY M	B	F	55	UB02			CERTIFIED TEACHER GA	6/6/81	04	EVANS CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	GAINEY JR CECIL B	W	M	46	UB04			VOCATIONAL TEACHER VET	12/11/87	04	EVANS CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	BASS HORACE M	W	M	53	UB07			PRINCIPAL	12/17/88	04	EVANS CORR INST
	TOTAL POSITIONS ELIMINATED 1										
	COMPETITIVE AREA 05										
13	FLEMING RENEE	B	F	43	CD20	04	C	LIBRARY SPECIALIST	2/24/95	05	KERSHAW CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	GALLOWAY MARIANNE K	W	F	49	JA80	04	E	INSPECTOR II	3/26/87	05	KERSHAW CORR INST
	TOTAL POSITIONS ELIMINATED 1										
13	WOODLIEF PAULA L	W	F	45	UB02			CERTIFIED TEACHER E	11/3/84	05	KERSHAW CORR INST
13	BALKCUM CATHY S	W	F	45	UB02			CERTIFIED TEACHER GA	11/17/95	05	KERSHAW CORR INST
13	BEATY MARY G	B	F	66	UB02			CERTIFIED TEACHER GA	11/17/95	05	KERSHAW CORR INST
13	BAKER JAMES D	W	M	54	UB02			CERTIFIED TEACHER M	10/4/97	05	KERSHAW CORR INST
	TOTAL POSITIONS ELIMINMATED 4										
13	BROWN THOMAS A	W	M	46	UB04			VOCATIONAL TEACHER VM	8/18/95	05	KERSHAW CORR INST
13	YOUNG PATRICK C	W	M	52	UB04			VOCATIONAL TEACHER VC	9/8/95	05	KERSHAW CORR INST
	TOTAL POSITIONS ELIMINATED 2										
13	FYE MYRTICE J	B	F	59	UB06			GUIDANCE COUNSELOR GA	4/28/95	05	KERSHAW CORR INST
	TOTAL POSITIONS ELIMINATED 1										
	COMPETITIVE AREA 06										
	JENKINS VERA S	B	F	41	AA75	04	D	ADMINISTRATIVE ASSISTANT	3/1/80	06	LIEBER CORRECTIONAL INSTITUTION
1	ROWELL JAMIE L	W	F	39	AA75	04	D	ADMINISTRATIVE ASSISTANT	11/5/84	06	COASTAL OFFICE
	WESTBURY NELDA A	W	F	52	AA75	04	D	ADMINISTRATIVE ASSISTANT	2/2/85	06	LIEBER CORRECTIONAL INSTITUTION
	MORRIS KRISKA C	B	F	45	AA75	04	C	ADMINISTRATIVE ASSISTANT	4/20/85	06	MACDOUGALL CORRECTIONAL INST
	HUNTER SHERI C	W	F	36	AA75	04	A	ADMINISTRATIVE ASSISTANT	10/31/86	06	MACDOUGALL CORRECTIONAL INST
	RODRIGUEZ DEBORAH M	H	F	52	AA75	04	D	ADMINISTRATIVE ASSISTANT	11/28/86	06	COASTAL PRE RELEASE CENTER

POSITIONS BEING ELIMINATED AND EMPLOYEES ELIGIBLE FOR BUMPING IN EACH COMPETITIVE AREA

R I F 123		EMPLOYEE NAME	RACE	SEX	AGE	CLASS TITLE	GRADE	STEP	CLASSIFICATION TITLE	RIF SVC DATE	CAR ME PA	LOCATION
		RAMEY GEORGINA	W	F	53	AA75	04	A	ADMINISTRATIVE ASSISTANT	12/3/88	06	MACDOUGALL CORRECTIONAL INST
		CARRINGTON LISA T	W	F	37	AA75	04	D	ADMINISTRATIVE ASSISTANT	5/28/94	06	LIEBER CORRECTIONAL INSTITUTION
3		CROSBY TAMMY L	W	F	36	AA75	04	A	ADMINISTRATIVE ASSISTANT	12/29/95	06	LIEBER CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
13		HAAS JUDITH M	W	F	47	CB35	03	D	ASSOC TEACHER/CENTER DIR	6/9/84	06	LIEBER CORR INST
		TOTAL POSITIONS ELIMINATED 1										
13		SHEEDY VICTORIA H	W	F	50	JA80	04	E	INSPECTOR II	4/16/87	06	LIEBER CORR INST
13		MYERS LORI C	W	F	36	JA80	04	E	INSPECTOR II	7/24/87	06	MACDOUGALL CORR INST
		TOTAL POSITIONS ELIMINATED 2										
		REID ALMA L	B	F	56	UB02			CERTIFIED TEACHER GA	8/7/77	06	MACDOUGALL CORR INST
1		MARINKO WILLIAM T	W	M	52	UB02			CERTIFIED TEACHER GA	4/22/81	06	LIEBER CORR INST
13		PYATT ADALINE J	B	F	49	UB02			CERTIFIED TEACHER E	8/6/83	06	LIEBER CORR INST
	R4	GREENE ALFONSO	B	M	61	UB02			CERTIFIED TEACHER M	10/6/84	06	MACDOUGALL CORR INST
3		BOWEN WILLIAM S	W	M	33	UB02			CERTIFIED TEACHER GA	3/11/94	06	MACDOUGALL CORR INST
	R4	GRATZER STEVEN C	W	M	54	UB02			CERTIFIED TEACHER MS	9/3/94	06	MACDOUGALL CORR INST
13		BROWN ROBERT C	W	M	36	UB02			CERTIFIED TEACHER GA	9/11/94	06	LIEBER CORR INST
13		TRIPP JERRELYN	W	F	64	UB02			CERTIFIED TEACHER E	11/4/94	06	LIEBER CORR INST
		TOTAL POSITIONS ELIMINATED 4										
		CLARK JR CLARENCE A	W	M	59	UB04			VOCATIONAL TEACHER VC	11/27/76	06	MACDOUGALL CORR INST
		MORANT JOSEPH	B	M	51	UB04			VOCATIONAL TEACHER- VM	7/17/89	06	MACDOUGALL CORR INST
		HILL JR BOBBY W	W	M	46	UB04			VOCATIONAL TEACHER VAB	10/4/91	06	MACDOUGALL CORR INST
13		WHITE MARK A	W	M	41	UB04			VOCATIONAL TEACHER VC	10/2/98	06	LIEBER CORR INST
		TOTAL POSITIONS ELIMINATED 1										
		COMPETITIVE AREA 07										
13		ENGLISH CRYSTAL S	W	F	47	JA80	04	E	INSPECTOR II	10/10/86	07	ALLENDALE CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
13		BEENKEN RITA A	W	F	53	UB02			CERTIFIED TEACHER E	3/3/96	07	ALLENDALE
13		HAYES JR HARVEY	B	M	59	UB02			CERTIFIED TEACHER GA	4/5/97	07	ALLENDALE
13		BROOKS ELIZABETH	B	F	49	UB02			CERTIFIED TEACHER GA	6/7/97	07	ALLENDALE
		TOTAL POSITIONS ELIMINATED 3										
13		THOMAS DONALD C	W	M	51	UB04			VOCATIONAL TEACHER VC	8/24/91	07	ALLENDALE
13		LAWSON JR JOHN M	W	M	55	UB04			VOCATIONAL TEACHER VAC	3/29/97	07	ALLENDALE
		TOTAL POSITIONS ELIMINATED 2										
13		NEWSOME JOHN D	B	M	58	UB06			GUIDANCE COUNSELOR G	5/18/96	07	ALLENDALE
		TOTAL POSITIONS ELIMINATED 1										
		COMPETITIVE AREA 08										
		NONE IN THIS AREA										
		COMPETITIVE AREA 09										
13		MILLER CONNIE A	W	F	46	JA80	04	D	INSPECTOR II	9/18/92	09	LOWER SAV PRE RELEASE
		TOTAL POSITIONS ELIMINATED 1										

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POSITIONS NG ELIMINATED AND EMPLOYEES ELIGIBLE FOR BUMPING IN EACH COMPE VE AREA

R I F 123		EMPLOYEE NAME	C A G E	S E X	A G E	C L J A B S	L A N D	E V E L	CLASSIFICATION TITLE	RIF SVC DATE	C A O R M E P A	LOCATION
		COMPETITIVE AREA 10										
13		NEWBY CHERYL	W	F	45	JA80	04	E	INSPECTOR II	11/26/83	10	LEATH CORR INST
13		WILKIE KAREN M	W	F	39	JA80	04	E	INSPECTOR II	4/23/88	10	MCCORMICK CORR INST
		TOTAL POSITIONS ELIMINATED 2										
13		DREYER WILLIAM K	W	M	58	UB02			CERTIFIED TEACHER GA	4/30/82	10	MCCORMICK CORR INST
13		BOXX JR FRANK A	W	M	51	UB02			CERTIFIED TEACHER GA	9/23/89	10	LEATH CORR INST
13		FRITTS RUTH L	W	F	52	UB02			CERTIFIED TEACHER GA	10/7/89	10	LEATH CORR INST
13		CULBREATH BERNETHA L	B	F	42	UB02			CERTIFIED TEACHER GA	2/24/90	10	LEATH CORR INST
13		JONES ELOIS C	B	F	52	UB02			CERTIFIED TEACHER MS	6/8/90	10	LEATH CORR INST
		TOTAL POSITIONS ELIMINATED 5										
13		JEFFERIES JR GRAYSON P	W	M	50	UB04			VOCATIONAL TEACHER VA	10/22/71	10	MCCORMICK CORR INST
13		KING GEORGE R	W	M	52	UB04			VOCATIONAL TEACHER VH	4/8/88	10	LEATH CORR INST
13		DEAL SYLVIA D	W	F	62	UB04			VOCATIONAL TEACHER VS	12/8/89	10	LEATH CORR INST
13		BOWYER KATHERINA W	B	F	51	UB04			VOCATIONAL TEACHER VO	12/21/91	10	LEATH CORR INST
		TOTAL POSITIONS ELIMINATED 4										
13		BRIDGES ANN T	W	F	56	UB06			GUIDANCE COUNSELOR G	9/4/83	10	LEATH CORR INST
13		JONES ETTA J	W	F	59	UB06			GUIDANCE COUNSELOR G	8/24/84	10	MCCORMICK CORR. INST
		TOTAL POSITIONS ELIMINATED 2										
13		COBB RANCE C	W	M	53	UB07			PRINCIPAL	3/12/70	10	LEATH CORR INST
		TOTAL POSITIONS ELIMINATED 1										
		COMPETITIVE AREA 11										
1		SNIPES JR CONNIE M	W	M	53	AH15	06	D	ADMINISTRATIVE COORD II	6/2/70	11	APPALACHIAN OFFICE
23		QUINN AVERY R	W	M	60	AH15	06	D	ADMINISTRATIVE COORD II	10/2/93	11	TYGER RIVER CORRECTIONAL INST
		FARMER PAMELA I	W	F	49	AH10	05	C	ADMINISTRATIVE COORD I	10/20/77	11	TYGER RIVER CORRECTIONAL INSTITUTION
		GRAYDON BENNY RAY	W	M	54	AH10	05	E	ADMINISTRATIVE COORD I	3/28/80	11	PERRY CORRECTIONAL INST
		TOTAL POSITIONS ELIMINATED 1										
		DODKIN GEORGE ADRIAN FIK	W	M	48	AH40	06	E	PROGRAM COORDINATOR II	6/30/78	11	NORTHSIDE CORRECTIONAL INSTITUTION
13		FOSTER KAROL J	W	F	54	AH35	05	A	PROGRAM COORDINATOR I	2/8/80	11	APPALACHIAN OFFICE
	R5	BALENTINE OLIN D	W	M	59	AH35	05	C	PROGRAM COORDINATOR I	3/19/81	11	PERRY CORRECTIONAL INSTITUTION
	R5	KINARD APRIL	B	F	40	AH35	05	B	PROGRAM COORDINATOR I	5/29/82	11	TYGER RIVER CORRECTIONAL INSTITUTION
	R5	ALEXANDER CHARLES E	W	M	51	AH35	05	E	PROGRAM COORDINATOR I	11/12/82	11	PERRY CORRECTIONAL INSTITUTION
	R5	JAMESON RON B	W	M	49	AH35	05	B	PROGRAM COORDINATOR I	1/7/83	11	TYGER RIVER CORRECTIONAL INSTITUTION
	R5	CARSON JOHN R	W	M	63	AH35	05	E	PROGRAM COORDINATOR I	12/15/84	11	TYGER RIVER CORRECTIONAL INSTITUTION
	R5	OGUNSILE FELICIA I	B	F	46	AH35	05	B	PROGRAM COORDINATOR I	1/21/89	11	PERRY CORRECTIONAL INSTITUTION
	R5	PARKS JACKIE E	W	M	51	AH35	05	E	PROGRAM COORDINATOR I	1/28/89	11	NORTHSIDE CORRECTIONAL INSTITUTION
		TOTAL POSITIONS ELIMINATED 1										
		BROWN CAROLYN D	B	F	41	GA40	04	C	HUMAN SERVICES SPEC II	11/25/83	11	LIVESAY PRE RELEASE CENTER
13		HENLEY ALDEAN	B	M	49	GA40	04	B	HUMAN SERVICES SPEC II	3/8/91	11	PERRY CORR INST
		TOTAL POSITIONS ELIMINATED 1										
13		SWOFFORD MARIE M	W	F	54	JA80	04	E	INSPECTOR II	11/22/79	11	NORTHSIDE CORR INST
13		BLAIR CAROLYN I	W	F	57	JA80	04	E	INSPECTOR II	10/17/97	11	PERRY CORR INST
		TOTAL POSITIONS ELIMINATED 2										

SEE P.S FR SECT O OF P.F.R

POSITIONS ELIMINATED AND EMPLOYEES ELIGIBLE FOR BUMPING IN EACH COMPETITIVE AREA

R						C		L				
I			R			L	B	E			C A	
F		EMPLOYEE	A	S	A	J A	A	V		RIF	O R	
1 2 3		NAME	C	E	G	O S	N	E	CLASSIFICATION TITLE	SVC DATE	M E	LOCATION
			E	X	E	B S	D	L			P A	
1		DAVIS RONALD M	W	M	52	UB02			CERTIFIED TEACHER M	6/18/77	11	PERRY CORR INST
1		BRATTON LINDA M	B	F	48	UB02			CERTIFIED TEACHER GA	1/3/82	11	PERRY CORR. INST
		AUSTIN DIANE N	W	F	62	UB02			CERTIFIED TEACHER MS	6/4/82	11	TYGER RIVER CORR INST
1		HOWARD EILEEN L	W	F	56	UB02			CERTIFIED TEACHER E	2/1/86	11	PERRY CORR INST
1 3		BERNARD OTHELLA R	W	F	61	UB02			CERTIFIED TEACHER GA	1/13/90	11	PERRY CORR INST
3		HAYES MARY G	W	F	59	UB02			CERTIFIED TEACHER E	8/28/91	11	TYGER RIVER CORR INST
3		FARR JACQUELINE D	B	F	60	UB02			CERTIFIED TEACHER GA	9/20/92	11	TYGER RIVER CORR INST
1 3		MCCABE MARY H	W	F	55	UB02			CERTIFIED TEACHER MS	1/30/93	11	PERRY CORR INST
1 3		WHITE SUSAN C	W	F	55	UB02			CERTIFIED TEACHER GA	7/2/94	11	NORTH SIDE CORR INST
1 3		WHITE WILLIAM M	W	M	52	UB02			CERTIFIED TEACHER MS	12/8/95	11	TYGER RIVER CORR INST
1 3		MAILLOUX MARGUERITE J	W	F	51	UB02			CERTIFIED TEACHER E	2/17/97	11	NORTHSIDE CORR INST
3		HOWARD DAVID L	W	M	52	UB02			CERTIFIED TEACHER GA	3/9/97	11	TYGER RIVER CORR INST
		TOTAL POSITIONS ELIMINATED 8										
		WILLIAMS CHARLES L	W	M	54	UB04			VOCATIONAL TEACHER VC	6/4/81	11	TYGER RIVER CORR INST
1		HENDERSON JR ARNOLD	W	M	56	UB04			VOCATIONAL TEACHER VM	1/22/83	11	NORTHSIDE CORR INST
1 3		FLOYD JOHNNY	B	M	52	UB04			VOCATIONAL TEACHER VM	2/4/83	11	PERRY CORR INST
3		RANDOLPH MAX	W	M	59	UB04			VOCATIONAL TEACHER VM	7/10/86	11	TYGER RIVER CORR. INST
1 3		BELL JAMES C	W	M	50	UB04			VOCATIONAL TEACHER VC	3/21/90	11	PERRY CORR INST
1 3		LENKER RICHARD E	W	M	52	UB04			VOCATIONAL TEACHER VH	3/3/95	11	PERRY CORR. INST
	R4	POOLE MICHAEL T	W	M	32	UB04			VOCATIONAL TEACHER VAC	3/8/96	11	TYGER RIVER CORR INST
	R4	JUSTICE JAMES D	W	M	32	UB04			VOCATIONAL TEACHER VAB	4/20/96	11	TYGER RIVER CORR INST
	R4	PARKS JERRY T	W	M	55	UB04			VOCATIONAL TEACHER VA	1/8/99	11	TYGER RIVER CORR INST
		TOTAL POSITIONS ELIMINATED 4										
		POSITIONS TO BE ELIMINATED NOT SUBJECT TO RIF POLICY 15 EMPLOYEES										
3	T	Brigman Merle	W	F	65	9999			ADMIN SPECIALIST II	8/19/02	01	EDUCATIONAL SERVICES
3	T	HARRISON KISHA L	B	F	33	9999			LIBRARY ASST	10/18/02	07	ALLENDALE
3	T	GIVENS LESLIE R	B	F	31	9999			ADMIN SPECIALIST II	9/23/02	06	COASTAL PRE RELEASE
3	T	RUDY KENNETH	W	M	56	9999			RECORDS SPECIALIST	8/1/02	01	DIV OF CLASS & INMATE RECDS
3	T	WARD KIMBERLY	W	F	39	9999			RECORDS ANALYST	6/24/02	01	DIV OF CLASS & INMATE RECDS
3	T	PRIOLEAU MARGIE D	B	F	39	9999			ADMIN ASST	12/31/02	06	MACDOUGALL CORR INST
3	T	SEASE JODI B	W	F	30	9999			ADMIN SPECIALIST II	9/10/02	01	TRAINING ADMIN DIV
3	P	CONYERS DANETTE	B	F	25	AA50	03	C	ADMIN SPECIALIST II	12/30/02	01	HUMAN RESOURCES DIV
3	P	FAILE AARON K	W	M	42	KA30	06	A	BUILDING/GROUNDS MGR	10/7/02	01	MAINTENANCE ADMIN
3	P	DOSS DANNY H	W	M	54	UB02			CERTIFIED TEACHER	12/2/02	10	MCCORMICK CORR INST
3	G	LI MICHAEL S	A	M	40	HD70			ENG/ASSOS ENG III	9/11/00	01	CIV LABOR POOL
3	G	PARNELL GERALDINE	B	F	51	CB30			TEACHER ASSISTANT	1/2/02	05	KERSHAW CORR INST
3	G	THOMSON MARILYN M	W	F	55	AA75			ADMINISTRATIVE ASSISTANT	1/13/03	11	TYGER RIVER CORR. INST
3	T	ODOMS GERALDEAN G	B	F	48	9999			COMPUTER LAB MGR	5/13/02	7	TYGER RIVER CORR INST
3	T	PARKS WILLA D	B	F	66	9999			SPECIAL TEACHER	5/22/02	11	ALLENDALE
		TOTAL EMPLOYEES RIF 148										
		1 RIF EMPLOYEE										
		2 EMPLOYEE SUBJECT TO BUMPING										
		3 EMPLOYEE SUBJECT TO POSSIBLE LAYOFF										

POSITIONS ING ELIMINATED AND EMPLOYEES ELIGIBLE FOR BUMPING IN EACH COMPF IVE AREA

						C		L					
R			R			L	B	E			C	A	
I			A	S	A	J	A	A	V		RIF	O	R
F		EMPLOYEE	C	E	G	O	S	N	E	CLASSIFICATION	SVC	M	E
123		NAME	E	X	E	B	S	D	L	TITLE	DATE	P	A	LOCATION
	P	PROBATIONARY EMPLOYEE											
	T	TEMPORARY EMPLOYEE											
	G	TEMPORARY GRANT EMPLOYEE											
		R1 R5 NOT RETAINED DUE TO NECESSARY QUALIFICATIONS SEE SECTION V OF RIF PLAN											
		KEY CODE EDUCATION TEACHERS (UB02 UB04 UB05				UB06)							
		MS MEDIA SPECIALIST								VET ELECTRONIC			
		G GUIDANCE								VM MASONRY			
		E ENGLISH								VA AUTO MECHANICS			
		M MATH								VH HORTICULTURE			
		SE SPECIAL EDUCATION								VAC HEATING/AIR CONDITIONING			
		GA GENERAL ACADEMIC								VAB AUTO BODY REPAIR/FENDER			
		VW WELDING								VHM HEAVY EQUIP MECHANIC			
		VC CARPENTRY								VHO HEAVEY EQUIP OPERATOR			
		VP PLUMBING								VAR APPLIANCE REPAIR			
		VEL ELECTRICIAN								VS SEWING			
										VO-OFFICE OCCUPATIONS			

SEE DIS AIMER IN SECTION V OF RIF P A

Employees Subject to by Institution

Inst	Name	Job			Description	Pay Code
Allendale	Kisha Harrison	9999			Library Asst	850
Allendale	Geraldean Odoms	9999			Computer Lab Mgr	850
Allendale	John Lawson, Jr	UB04			Vocational Teacher	830
Allendale	Donald Thomas	UB04			Vocational Teacher	830
Allendale	John Newsome	UB06			Guidance Counselor	840
Allendale	Rita Beenken	UB02			Certified Teacher	850
Allendale	Elizabeth Brooks	UB02			Certified Teacher	850
Allendale	Harvey Hayes, Jr	UB02			Certified Teacher	850
Broad River	Yvette Lakin	UB02			Certified Teacher	850
Broad River	Lavenia Thomas	UB02			Certified Teacher	850
Broad River	William Dittmar	UB04			Vocational Teacher	830
Broad River	Beverly McClanahan	UB04			Vocational Teacher	830
Broad River	Lavern Witherspoon	AH40	06	C	Program Coordinator II	840
Broad River	Geneva Martin	UB02			Certified Teacher	850
Evans	James Hendley	CD20	04	C	Library Specialist	820
Evans	Cecil Gainey, Jr	UB04			Vocational Teacher	830
Evans	Sharon D Mullins	AA75	04	A	Administrative Assistant	840
Evans	Mary Hudson	UB02			Certified Teacher	850
Evans	Horace Bass	UB07			Principal	870
Goodman	Mariam Myers	UB02			Certified Teacher	850
Goodman	Valeta Geddis	GA40	04	B	Human Services Spec II	840
Headquarters	Merle Brigman	9999			Admin Specialist II	810
Headquarters	Katherine Myers	AA75	04	A	Admin Assistant	810
Kershaw	Renee Fleming	CD20	04	C	Library Speicalist	820
Kershaw	Thomas Brown	UB04			Vocational Teacher	830
Kershaw	Patrick Young	UB04			Vocational Teacher	830
Kershaw	Cathy Balkcum	UB02			Certified Teacher	840
Kershaw	Myrtice Fye	UB06			Guidance Counselor	840
Kershaw	James Baker	UB02			Certified Teacher	850
Kershaw	Mary Beaty	UB02			Certified Teacher	850
Kershaw	Geraldine Parnell (G)	CB30			Teacher Assistant	850
Kershaw	Paula Woodlief	UB02			Certified Teacher	850
Kirkland	Deloris Labrew	UE07			Academic Program Manager	850
Kirkland	Carolyn Smith	UE07			Academic Program Manager	850

L[illegible]	Elois Jones	UB02			Certified Teacher (Librarian)	820
Leath	Katherian Bowyer	UB04			Vocational Teacher	830
Leath	Sylvia Deal	UB04			Vocational Teacher	830
Leath	George King	UB04			Vocational Teacher	830
Leath	Ann Bridges	UB06			Guidance Counselor	840
Leath	Frank Boxx, Jr	UB02			Certified Teacher	850
Leath	Bernetha Culbreath	UB02			Certified Teacher	850
Leath	Ruth Fritts	UB02			Certified Teacher	850
Leath	Rance Cobb	UB07			Principal	870
Lee	Mary Timmons	AA50	03	A	Admin Specialist II	810
Lee	David Deloe	UB04			Vocational Teacher	830
Lee	Ruth Pierson	UB06			Guidance Counselor	840
Lieber	Judith Haas	CB35	03	D	Assoc Teacher	820
Lieber	Mark White	UB04			Vocational Teacher	830
Lieber	Robert Brown	UB02			Certified Teacher	850
Lieber	William Marinko	UB02			Certified Teacher	850
Lieber	Adaline Pyatt	UB02			Certified Teacher	850
Lieber	Jerrelyn Tripp	UB02			Certified Teacher	850
MacDougall	Margie Prioleau	9999			Admin Asst	870
Manning	William Vinson III	UB07			Principal	870
Manning	L S Green	UB02			Certified Teacher	820
Manning	James Dorsey	UB04			Vocational Teacher	830
Manning	Carroll King	UB04			Vocational Teacher	830
Manning	Jacqueline Venning	UB06			Guidance Counselor	840
Manning	Jeannie Croxton	UB02			Certified Teacher	850
Manning	Rose Ruger	UB02			Certified Teacher	850
Manning	Talmadge Smith	UB02			Certified Teacher	850
McCormick	Grayson Jefferies, Jr	UB04			Vocational Teacher	830
McCormick	Etta Jones	UB06			Guidance Counselor	840
McCormick	Danny Doss	UB02			Certified Teacher	850
McCormick	William Dreyer	UB02			Certified Teacher	850
Northside	Arnold Henderson, Jr	UB04			Vocational Teacher	830
Northside	Susan White	UB02			Certified Teacher	850
Northside	Marguerite Mailloux	UB02			Certified Teacher	850
Perry	Mary McCabe	UB02			Certified Teacher (Librarian)	820
Perry	James Bell	UB04			Vocational Teacher	830

Employees Subject [illegible] by Institution

[illegible]	Johnny Floyd	UB04			Vocational Teacher	830
Perry	Aldean Henley	GA40	04	B	Human Services Spec II	830
Perry	Richard Lenker	UB04			Vocational Teacher	830
Perry	Othellan Bernard	UB02			Certified Teacher	850
Perry	Linda Bratton	UB02			Certified Teacher	850
Perry	Ronald Davis	UB02			Certified Teacher	850
Perry	Eileen Howard	UB02			Certified Teacher	850
Stevenson	Nancy Glenn	UB02			Certified Teacher(Librarian)	820
Tyger River	Willa Parks	9999			Special Teacher	850
Tyger River	William White	UB02			Certified Teacher (Librarian)	820
Tyger River	Marilyn Thomson (G)	AA75			Administrative Assistant	850
Walden	Theron Phillips	UB04			Vocational Teacher	830
Walden	Eugene McMillan	UB02			Certified Teacher	850
Wateree	Anthony Bettencourt	UB04			Vocational Teacher	830
Wateree	James Corbett	UB04			Vocational Teacher	830
Wateree	Albertha Haynesworth	UB07			Principal	870
Watkins	Edward Sharpe	UB04			Vocational Teacher	830

RESPONSE TO QUESTION # 3 NEW POSITIONS CREATED 7/2/03 TO PRESENT (FTE/TEMP/TEMP GRANT) - SORTED BY CREATE DATE

		L				
	B	E				
	A	V				
JOB	N	E	APP		INTERNAL	CREATE
CLASS	D	L	CLASS	LOCATION	TITLE	DATE
9999	00		AG20	HUMAN RESOURCES ADMINISTRATION	ASST DIR HUMAN RESOURSES	7/28/03
9999	00		AH10	VEHICLE MANAGEMENT	ADMIN ASST III	7/28/03
9999	00		GA50	BROAD RIVER CORRECTIONAL INSTITUTION	HUMAN SVCS COORD I	7/28/03
9999	00		HD65	LEE CORRECTIONAL INSTITUTION	ENGINEERING ASSOC II	7/28/03
9999	00		JD60	RIDGELAND CORR INSTITUTION	WARDEN II	7/28/03
9999	00		EA20	LEATH CORR INSTIT (WOMEN)	STAFF NURSE	7/30/03
9999	00		AH30	BROAD RIVER CORRECTIONAL INSTITUTION	CASEWORKER I	8/5/03
9999	00		GC20	BROAD RIVER CORRECTIONAL INSTITUTION	CLIN CHAPLAIN II	8/5/03
9999	00		HD75	CIV LABOR POOL 9511	ENG/ASSOC ENG IV	8/5/03
9999	00		JD60	MCCORMICK CORRECTIONAL INSTITUTION	WARDEN II	8/5/03
9999	00		AH15	LEE CORRECTIONAL INSTITUTION	BUSINESS MGR III	8/8/03
9999	00		AH30	BROAD RIVER CORRECTIONAL INSTITUTION	CASEWORKER I	8/8/03
9999	00		JD35	KIRKLAND CORRECTIONAL INSTITUTION	CORPORAL II	8/8/03
9999	00		JD40	KIRKLAND CORRECTIONAL INSTITUTION	LIEUTENANT II	8/8/03
9999	00		KC50	MANNING CORRECTIONAL INSTITUTION	TRADES SPEC V	8/8/03
9999	00		HD65	FACILITIES MANAGEMENT	SHOP MANAGER HVAC/KITCHEN	8/11/03
9999	00		AH35	BROAD RIVER CORRECTIONAL INSTITUTION	CASEWORKER III	8/14/03
9999	00		HD65	FACILITIES MANAGEMENT	ENGINEERING ASSOC III	8/14/03
9999	00		KB15	EVANS CORRECTIONAL INSTITUTION	FOOD SVC SPEC III	8/18/03
9999	00		UB09	PALMETTO UNIFIED SCHOOL DISTRICT #1	SUPT OF EDUCATION	8/18/03
9999	00		JD50	KIRKLAND CORRECTIONAL INSTITUTION	MAJOR	8/19/03
9999	00		AH10	INDUSTRIES ADMINISTRATION NN	ADMIN ASST II	8/20/03
9999	00		UB04	TURBEVILLE CORRECTIONAL INSTITUTION	VOC TEACHER	8/21/03
9999	00		JD55	CATAWBA PRE-RELEASE CENTER	WARDEN I	8/25/03
9999	00		UB02	TURBEVILLE CORRECTIONAL INSTITUTION	CERTIFIED TEACHER	8/27/03
9999	00		JD50	KIRKLAND CORRECTIONAL INSTITUTION	MAJOR	9/2/03
9999	00		KB15	MANNING CORRECTIONAL INSTITUTION	FOOD SVC SPEC III	9/2/03
9999	00		JD55	MANNING CORRECTIONAL INSTITUTION	WARDEN I	9/4/03

RESPONSE TO QUESTION # 3 NEW POSITIONS CREATED 7/2/03 TO PRESENT (FTE/TEMP/TEMP GRANT) - SORTED BY CREATE DATE

		L				
	B	E				
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JOB	N	E	APP		INTERNAL	CREATE
CLASS	D	L	CLASS	LOCATION	TITLE	DATE
9999	00		KC50	LIEBER CORRECTIONAL INSTITUTION	TRADES SPEC V	9/4/03
9999	00		UB02	TURBEVILLE CORRECTIONAL INSTITUTION	CLASSROOM TEACHER	9/4/03
9999	00		GA40	GOODMAN CORRECTIONAL INSTITUTION	COMMUNITY PRGM SUPV I	9/5/03
9999	00		JD60	MACDOUGALL CORRECTIONAL INST	WARDEN II	9/11/03
9999	00		AH10	CANTEEN WHSE INVENTORY/DISTRIBUTION	BUSINESS MGR I	9/15/03
9999	00		GA40	GOODMAN CORRECTIONAL INSTITUTION	HUMAN SVCS SPEC II	9/15/03
9999	00		JD35	RECRUITING & EMPLOYMENT SERVICES	LIEUTENANT I	9/15/03
9999	00		KC50	MACDOUGALL CORRECTIONAL INST	TRADES SPEC V	9/15/03
9999	00		UB02	TURBEVILLE CORRECTIONAL INSTITUTION	CERTIFIED TEACHER	9/15/03
9999	00		AD25	BUDGET/FINANCE	ACCTNT/FISCAL ANALYST III	9/16/03
9999	00		HD65	INDUSTRIES ADMINISTRATION NN	ENINEERING ASSOCIATE	9/16/03
9999	00		JD30	KIRKLAND CORRECTIONAL INSTITUTION	OFFICER II	9/16/03
9999	00		JD35	COASTAL PRE-RELEASE CENTER	LIEUTENANT I	9/16/03
9999	00		JD50	LEE CORRECTIONAL INSTITUTION	ASSOCIATE WARDEN	9/22/03
9999	00		JD50	LIEBER CORRECTIONAL INSTITUTION	ACTING ASSOC WARDEN	9/23/03
9999	00		JD60	KIRKLAND CORRECTIONAL INSTITUTION	WARDEN II	9/23/03
9999	00		EA10	EVANS CORRECTIONAL INSTITUTION	LICENSED PRACTICAL NURSE	1/16/04
9999	00		EA10	EVANS CORRECTIONAL INSTITUTION	LPN	1/16/04
9999	00		EA10	CAMILLE GRAHAM CORRECTIONAL INST	LPN	1/16/04
9999	00		EA10	MCCORMICK CORRECTIONAL INSTITUTION	LPN	1/16/04
9999	00		EA20	LIEBER CORRECTIONAL INSTITUTION	STAFF NURSE	1/16/04
9999	00		EA20	LIEBER CORRECTIONAL INSTITUTION	RN	1/16/04
9999	00		EA20	BROAD RIVER CORRECTIONAL INSTITUTION	RN	1/16/04
9999	00		EC10	MEDICAL SUPPORT	CNA	1/16/04
9999	00		EC10	EVANS CORRECTIONAL INSTITUTION	CNA	1/16/04
9999	00		EB25	KIRKLAND CORRECTIONAL INSTITUTION	PHARMACIST	2/3/04
9999	00		EA20	ALLENDALE CORRECTIONAL INSTITUTION	STAFF NURSE	3/3/04
9999	00		EA20	KIRKLAND CORRECTIONAL INSTITUTION	RN	3/3/04

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	A	V				
JOB	N	E	APP		INTERNAL	CREATE
CLASS	D	L	CLASS	LOCATION	TITLE	DATE
9999	00		EA20	MEDICAL SUPPORT	STAFF NURSE	3/3/04
9999	00		EA20	LEE CORRECTIONAL INSTITUTION	RN	3/3/04
9999	00		EA20	LIEBER CORRECTIONAL INSTITUTION	STAFF NURSE	3/3/04
9999	00		JD40	TRAINING	CO III	3/15/04
9999	00		AH30	BROAD RIVER CORRECTIONAL INSTITUTION	PROGRAM ASST	3/25/04
9999	00		AA75	VEHICLE MANAGEMENT	ADMIN ASST I	5/17/04
9999	00		EB52	EVANS CORRECTIONAL INSTITUTION	DENTIST	6/1/04
9999	00		AA75	LOWER SAVANNAH PRE RELEASE CENTER	ADMIN ASST I	7/1/04
9999	00		AA75	STEVENSON CORRECTIONAL INSTITUTION	ADMIN ASST I	7/1/04
9999	00		AD10	CANTEEN WHSE INVENTORY/DISTRIBUTION	AUDITOR II	7/1/04
9999	00		AH10	OFFICE OF MEDICAL & HEALTH SERVICES	ADMIN MGR	7/1/04
9999	00		AH10	LIEBER CORRECTIONAL INSTITUTION	CANTEEN MGR IV	7/1/04
9999	00		AH30	EVANS CORRECTIONAL INSTITUTION	CASEWORKER I	7/1/04
9999	00		AH35	DIV OF CLASSIFICATION & INMATE RECORD	PRGM COORD	7/1/04
9999	00		AH40	DIV OF CLASSIFICATION & INMATE RECORD	PRGM COORD II	7/1/04
9999	00		AH40	DIV OF CLASSIFICATION & INMATE RECORD	PROG COORD II	7/1/04
9999	00		AH45	DIV OF CLASSIFICATION & INMATE RECORD	INMATE OPRNS & CNTL MGR	7/1/04
9999	00		GA40	CATAWBA PRE-RELEASE CENTER	HUMAN SVCS SPEC II	7/1/04
9999	00		GA50	MENTAL HEALTH	COUNSLR/SEX OFFENDER PROG	7/1/04
9999	00		JA15	INVESTIGATIONS	INVESTIGATOR III	7/1/04
9999	00		JA20	INVESTIGATIONS	INVESTIGATOR IV	7/1/04
9999	00		JC20	INVESTIGATIONS	LAW ENFORCEMENT OFFICER II	7/1/04
9999	00		JD30	TRENTON CORRECTIONAL INSTITUTION	OFFICER I	7/1/04
9999	00		JD30	LEATH CORR INSTIT (WOMEN)	OFFICER II	7/1/04
9999	00		JD30	KIRKLAND CORRECTIONAL INSTITUTION	OFFICER II	7/1/04
9999	00		JD35	GOODMAN CORRECTIONAL INSTITUTION	SERGEANT I	7/1/04
9999	00		JD35	GOODMAN CORRECTIONAL INSTITUTION	SERGEANT I	7/1/04
9999	00		JD35	WATEREE RIVER CORRECTIONAL INSTITUTIO	SERGEANT I	7/1/04

RESPONSE TO QUESTION # 3 - NEW POSITIONS CREATED 7/2/03 TO PRESENT (FTE/TEMP/TEMP GRANT) - SORTED BY CREATE DATE

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	A	V				
JOB	N	E	APP		INTERNAL	CREATE
CLASS	D	L	CLASS	LOCATION	TITLE	DATE
9999	00		JD40	LIEBER CORRECTIONAL INSTITUTION	LIEUTENANT II	7/1/04
9999	00		JD40	TRAINING	ADMIN LIEUTENANT II	7/1/04
9999	00		JD40	KIRKLAND CORRECTIONAL INSTITUTION	LIEUTENANT II	7/1/04
9999	00		JD40	TRAINING	ADMIN LIEUTENANT II	7/1/04
9999	00		JD50	TURBEVILLE CORRECTIONAL INSTITUTION	CAPTAIN III	7/1/04
9999	00		JD50	INMATE BUS TERMINAL	MAJOR	7/1/04
9999	00		JD50	MCCORMICK CORRECTIONAL INSTITUTION	CAPTAIN III	7/1/04
9999	00		JD50	MACDOUGALL CORRECTIONAL INST	CAPTAIN II	7/1/04
9999	00		JD50	KIRKLAND CORRECTIONAL INSTITUTION	MAJOR	7/1/04
9999	00		JD55	LEE CORRECTIONAL INSTITUTION	ASSOC WARDEN III	7/1/04
9999	00		JD55	COASTAL PRE-RELEASE CENTER	WARDEN I	7/1/04
9999	00		JD60	DIV OF CLASSIFICATION & COMPLIANCE	ACTNG DIR CLASS & COMPLI	7/1/04
9999	00		JD60	TYGER RIVER CORRECTIONAL INSTITUTION	WARDEN II	7/1/04
9999	00		JD60	LEE CORRECTIONAL INSTITUTION	WARDEN V	7/1/04
9999	00		JD60	LIEBER CORRECTIONAL INSTITUTION	WARDEN II	7/1/04
9999	00		KB15	MANNING CORRECTIONAL INSTITUTION	FOOD SVC SPEC III	7/1/04
9999	00		KB20	LOWER SAVANNAH PRE RELEASE CENTER	FOOD SVC SPEC IV	7/1/04
9999	00		KB20	KIRKLAND CORRECTIONAL INSTITUTION	FOOD SVC SPEC IV	7/1/04
9999	00		KB25	TRENTON CORRECTIONAL INSTITUTION	FOOD SVC SPEC V	7/1/04
9999	00		KB30	FOOD SER WHSE INVENTORY/DISTRIBUTION	FOOD SVC SPEC VI	7/1/04
9999	00		KC50	MCCORMICK CORRECTIONAL INSTITUTION	TRADES SPEC V	7/1/04
9999	00		UB02	MACDOUGALL CORRECTIONAL INST	CLASSROOM TEACHER	7/1/04
9999	00		UB02	MACDOUGALL CORRECTIONAL INST	CLASSROOM TEACHER	7/1/04
9999	00		UB04	TYGER RIVER CORRECTIONAL INSTITUTION	VOCATIONAL TEACHER	7/1/04
UE07	00		UE07	PALMETTO UNIFIED SCHOOL DISTRICT #1	TITLE I PROGRAM MGR	7/1/04
9999	00		UE07	PALMETTO UNIFIED SCHOOL DISTRICT #1	EDUC PROG SUPV - CORR	7/1/04
9999	00		KD40	LIVESAY PRE RELEASE CENTER	VEHICLE OPERATOR II	8/1/04
9999	00		KD40	PALMER PRE-RELEASE CENTER	VEHICLE OPER	8/2/04

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	B	E				
	A	V				
JOB	N	E	APP		INTERNAL	CREATE
CLASS	D	L	CLASS	LOCATION	TITLE	DATE
9999	00		UB04	PERRY CORRECTIONAL INSTITUTION	VOCATIONAL TEACHER	8/2/04
9999	00		UB04	PERRY CORRECTIONAL INSTITUTION	VOCATIONAL ED TRAINER	8/2/04
9999	00		UB04	LEATH CORR INSTIT (WOMEN)	VOCATIONAL TEACHER	8/2/04
9999	00		UB04	ALLENDALE CORRECTIONAL INSTITUTION	VOCATIONAL TEACHER	8/2/04
9999	00		UB04	MCCORMICK CORRECTIONAL INSTITUTION	VOCATIONAL TEACHER	8/2/04
9999	00		UB04	KERSHAW CORRECTIONAL INSTITUTION	VOCATIONAL TEACHER	8/2/04
9999	00		UB04	BROAD RIVER CORRECTIONAL INSTITUTION	VOCATIONAL TEACHER	8/2/04
9999	00		UB04	MANNING CORRECTIONAL INSTITUTION	VOCATIONAL TEACHER	8/2/04
9999	00		UB04	KERSHAW CORRECTIONAL INSTITUTION	VOCATIONAL TEACHER	8/2/04
9999	00		KC50	LOWER SAVANNAH PRE RELEASE CENTER	TRADES SPEC V	9/2/04
9999	00		KD40	CAMPBELL PRE-RELEASE CENTER	DRIVER	9/17/04
9999	00		KD40	COASTAL PRE RELEASE CENTER	VEHICLE OPERATOR	10/2/04
9999	00		AH45	DIVISION OF PROGRAMS & SERVICES	GRANTS COORDINATOR	10/8/04
9999	00		AH25	COMPLIANCE STANDARDS & INSPECTIONS	MGMT REV COORD	10/17/04
9999	00		HD75	CIV LABOR POOL 9511	ASSOC ENG IV	1/5/05
9999	00		AJ50	NETWORK AND TELECOMMUNICATIONS	OPERATIONS MANAGER II	4/1/05
9999	00		AH25	OFFICE OF INSPECTOR GENERAL	SPECIAL ASST TO IG	4/18/05
9999	00		KD40	LOWER SAVANNAH PRE-RELEASE CENTER	DRIVER	5/2/05
9999	00		AD22	FINANCIAL ACCOUNTING	SR ACCOUNTANT	6/30/05
9999	00		AH10	OFFICE OF BUDGET AND RESOURCE	ADMIN COORD I	6/30/05
9999	00		AH15	KERSHAW CORRECTIONAL INSTITUTION	BUSINESS MGR III	6/30/05
9999	00		AH30	INDUSTRIES ADMINISTRATION NN	TRUCK DRIVER - P I	6/30/05
9999	00		AH35	KIRKLAND CORRECTIONAL INSTITUTION	CASEWORKER IV	6/30/05
AH45	07	B	AH45	RESOURCE & INFORMATION MGMT - ADMINIST	PROGRAM MANAGER I	6/30/05
9999	00		EA10	RIDGELAND CORR INSTITUTION	LPN	6/30/05
9999	00		EB52	RIDGELAND CORR INSTITUTION	DENTIST	6/30/05
9999	00		EC10	EVANS CORRECTIONAL INSTITUTION	DENTAL ASST I	6/30/05
9999	00		EC10	CAMILLE GRAHAM CORRECTIONAL INST	DENTAL ASST I	6/30/05

RESPONSE TO QUESTION # 3 - NEW POSITIONS CREATED 7/2/03 TO PRESENT (FTE/TEMP/TEMP GRANT) - SORTED BY CREATE DATE

		L				
	B	E				
	A	V				
JOB	N	E	APP		INTERNAL	CREATE
CLASS	D	L	CLASS	LOCATION	TITLE	DATE
9999	00		EC50	ALLENDALE CORRECTIONAL INSTITUTION	RECREATION SPEC III	6/30/05
9999	00		GA50	CAMILLE GRAHAM CORRECTIONAL INST	HUMAN SVCS COORD I	6/30/05
9999	00		GC20	CAMILLE GRAHAM CORRECTIONAL INST	CLIN CHAPLAIN II	6/30/05
9999	00		JD30	LOWER SAVANNAH PRE RELEASE CENTER	OFFICER I	6/30/05
9999	00		JD30	KIRKLAND CORRECTIONAL INSTITUTION	OFFICER II	6/30/05
9999	00		JD35	WATEREE RIVER CORRECTIONAL INSTITUTIO	SERGEANT I	6/30/05
9999	00		JD40	BROAD RIVER CORRECTIONAL INSTITUTION	LIEUTENANT II	6/30/05
9999	00		JD40	KIRKLAND CORRECTIONAL INSTITUTION	LIEUTENANT II	6/30/05
9999	00		JD40	RIDGELAND CORR INSTITUTION	CAPTAIN III	6/30/05
9999	00		JD40	SECURITY	LIEUTENANT II	6/30/05
9999	00		JD40	BROAD RIVER CORRECTIONAL INSTITUTION	LIEUTENANT II	6/30/05
9999	00		JD50	KIRKLAND CORRECTIONAL INSTITUTION	CAPTAIN III	6/30/05
9999	00		JD50	BROAD RIVER CORRECTIONAL INSTITUTION	CAPTAIN III	6/30/05
9999	00		JD50	BROAD RIVER CORRECTIONAL INSTITUTION	CAPTAIN III	6/30/05
9999	00		JD55	NORTHSIDE CORRECTIONAL INSTITUTION	WARDEN I	6/30/05
9999	00		JD60	PERRY CORRECTIONAL INSTITUTION	WARDEN V	6/30/05
9999	00		KA25	LEE CORRECTIONAL INSTITUTION	BUILDING/GROUNDS SUPV II	6/30/05
9999	00		KA30	EVANS CORRECTIONAL INSTITUTION	BUILDING/GROUNDS MGR	6/30/05
9999	00		KC50	VEHICLE MAINTENANCE	TRADES SPEC V	6/30/05
9999	00		UB07	TURBEVILLE CORRECTIONAL INSTITUTION	PRINCIPAL	6/30/05
9999	00		AA50	YOIP/YOA PROGRAM	ADMIN SPEC B	7/1/05
9999	00		GC20	BROAD RIVER CORRECTIONAL INSTITUTION	CHAPLAIN II	7/1/05
JD30	3	E	JD30	EVANS	CORR OFF II	7/1/05
JD30	3	E	JD30	EVANS	CORR OFF II	7/1/05
JD30	3	E	JD30	EVANS	CORR OFF II	7/1/05
JD30	3	E	JD30	EVANS	CORR OFF II	7/1/05
JD30	3	E	JD30	EVANS	CORR OFF II	7/1/05
JD30	3	E	JD30	EVANS	CORR OFF II	7/1/05

RESPONSE TO QUESTION # 3 - NEW POSITIONS CREATED 7/2/03 TO PRESENT (FTE/TEMP/TEMP GRANT) - SORTED BY CREATE DATE

		L				
	B	E				
	A	V				
JOB	N	E	APP		INTERNAL	CREATE
CLASS	D	L	CLASS	LOCATION	TITLE	DATE
JD30	3	E	JD30	KERSHAW	CORR OFF II	7/1/05
JD30	3	E	JD30	KERSHAW	CORR OFF II	7/1/05
JD30	3	E	JD30	KERSHAW	CORR OFF II	7/1/05
JD30	3	E	JD30	KERSHAW	CORR OFF II	7/1/05
JD30	3	E	JD30	KERSHAW	CORR OFF II	7/1/05
JD30	3	E	JD30	KERSHAW	CORR OFF II	7/1/05
JD30	3	E	JD30	KIRKLAND	CORR OFF II	7/1/05
JD30	3	E	JD30	KIRKLAND	CORR OFF II	7/1/05
JD30	3	E	JD30	KIRKLAND	CORR OFF II	7/1/05
JD30	3	E	JD30	KIRKLAND	CORR OFF II	7/1/05
JD30	3	E	JD30	KIRKLAND	CORR OFF II	7/1/05
JD30	3	E	JD30	KIRKLAND	CORR OFF II	7/1/05
JD30	3	E	JD30	LEE	CORR OFF II	7/1/05
JD30	3	E	JD30	LEE	CORR OFF II	7/1/05
JD30	3	E	JD30	LEE	CORR OFF II	7/1/05
JD30	3	E	JD30	LEE	CORR OFF II	7/1/05
JD30	3	E	JD30	LEE	CORR OFF II	7/1/05
JD30	3	E	JD30	LEE	CORR OFF II	7/1/05
JD30	3	E	JD30	LIEBER	CORR OFF II	7/1/05
JD30	3	E	JD30	LIEBER	CORR OFF II	7/1/05
JD30	3	E	JD30	LIEBER	CORR OFF II	7/1/05
JD30	3	E	JD30	LIEBER	CORR OFF II	7/1/05
JD30	3	E	JD30	LIEBER	CORR OFF II	7/1/05
JD30	3	E	JD30	LIEBER	CORR OFF II	7/1/05
JD30	3	E	JD30	MCCORMICK	CORR OFF II	7/1/05
JD30	3	E	JD30	MCCORMICK	CORR OFF II	7/1/05
JD30	3	E	JD30	MCCORMICK	CORR OFF II	7/1/05
JD30	3	E	JD30	MCCORMICK	CORR OFF II	7/1/05

RESPONSE TO QUESTION # 3 - NEW POSITIONS CREATED 7/2/03 TO PRESENT (FTE/TEMP/TEMP GRANT) - SORTED BY CREATE DATE

		L				
	B	E				
	A	V				
JOB	N	E	APP		INTERNAL	CREATE
CLASS	D	L	CLASS	LOCATION	TITLE	DATE
JD30	3	E	JD30	MCCORMICK	CORR OFF II	7/1/05
JD30	3	E	JD30	MCCORMICK	CORR OFF II	7/1/05
JD30	3	E	JD30	ALLENDALE	CORR OFF II	7/1/05
JD30	3	E	JD30	ALLENDALE	CORR OFF II	7/1/05
JD30	3	E	JD30	ALLENDALE	CORR OFF II	7/1/05
JD30	3	E	JD30	RIDGELAND	CORR OFF II	7/1/05
JD30	3	E	JD30	RIDGELAND	CORR OFF II	7/1/05
JD30	3	E	JD30	RIDGELAND	CORR OFF II	7/1/05
JD30	3	E	JD30	MACDOUGALL	CORR OFF I	7/1/05
JD30	3	E	JD30	MACDOUGALL	CORR OFF I	7/1/05
JD30	3	E	JD30	MACDOUGALL	CORR OFF I	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	PERRY	CORR OFF II	7/1/05
JD30	3	E	JD30	PERRY	CORR OFF II	7/1/05
JD30	3	E	JD30	PERRY	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	TURBEVILLE	CORR OFF II	7/1/05
JD30	3	E	JD30	TURBEVILLE	CORR OFF II	7/1/05
JD30	3	E	JD30	TURBEVILLE	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	TRENTON	CORR OFF II	7/1/05
JD30	3	E	JD30	TRENTON	CORR OFF II	7/1/05

RESPONSE TO QUESTION # 3 - NEW POSITIONS CREATED 7/2/03 TO PRESENT (FTE/TEMP/TEMP GRANT) - SORTED BY CREATE DATE

		L				
	B	E				
	A	V				
JOB	N	E	APP		INTERNAL	CREATE
CLASS	D	L	CLASS	LOCATION	TITLE	DATE
JD30	3	E	JD30	TRENTON	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	BROAD RIVER	CORR OFF II	7/1/05
JD30	3	E	JD30	KIRKLAND	CORR OFF II	7/1/05
JD30	3	E	JD30	LEE	CORR OFF II	7/1/05
JD30	3	E	JD30	LIEBER	CORR OFF II	7/1/05
JD30	3	E	JD30	PERRY	CORR OFF II	7/1/05
JD30	3	E	JD30	MCCORMICK	CORR OFF II	7/1/05
JD30	3	E	JD30	ALLENDALE	CORR OFF II	7/1/05
JD30	3	E	JD30	KERSHAW	CORR OFF II	7/1/05
JD30	3	E	JD30	MACDOUGALL	CORR OFF I	7/1/05
JD30	3	E	JD30	RIDGELAND	CORR OFF II	7/1/05
JD30	3	E	JD30	TRENTON	CORR OFF I	7/1/05
JD30	3	E	JD30	TURBEVILLE	CORR OFF II	7/1/05
JD30	3	E	JD30	TYGER RIVER	CORR OFF II	7/1/05
JD30	3	E	JD30	WATEREE RIVER	CORR OFF I	7/1/05
JD30	3	E	JD30	LIEBER	CORR OFF II	7/1/05
JD30	3	E	JD30	LEE	CORR OFF II	7/1/05
JD30	3	E	JD30	LEATH	CORR OFF II	7/1/05
JD30	3	E	JD30	KIRKLAND	CORR OFF II	7/1/05
JD30	3	E	JD30	PERRY	CORR OFF II	7/1/05
JD30	3	E	JD30	MCCORMICK	CORR OFF II	7/1/05
JD30	3	E	JD30	EVANS	CORR OFF II	7/1/05
JD30	3	E	JD30	CAMILLE GRAHAM	CORR OFF II	7/1/05
JD30	3	E	JD30	BROAD RIVER	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS STATE FUNDED	CORR OFF II	7/1/05

RESPONSE TO QUESTION # 3 - NEW POSITIONS CREATED 7/2/03 TO PRESENT (FTE/TEMP/TEMP GRANT) - SORTED BY CREATE DATE

JOB CLASS	BAND	LEVEL	APP CLASS	LOCATION	INTERNAL TITLE	CREATE DATE
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05

RESPONSE TO QUESTION # 3 - NEW POSITIONS CREATED 7/2/03 TO PRESENT (FTE/TEMP/TEMP GRANT) - SORTED BY CREATE DATE

		L				
	B	E				
	A	V				
JOB	N	E	APP		INTERNAL	CREATE
CLASS	D	L	CLASS	LOCATION	TITLE	DATE
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	CORR OFF II	7/1/05
JD30	3	E	JD35	INVESTIGATIONS	SERGEANT II	7/1/05
9999	00		AH45	COMPLIANCE STANDARDS & INSPECTIONS	DIV DIR -MGMT REVIEW	7/5/05
9999	00		AH30	CANTEEN WHSE INVENTORY/DISTRIBUTION	TRACTOR TRAILER DRIVER	8/1/05
9999	00		JD40	KIRKLAND CORRECTIONAL INSTITUTION	LIEUTENANT II	8/15/05
9999	00		UE07	PALMETTO UNIFIED SCHOOL DISTRICT #1	CURRICULUM COORD	8/15/05
9999	00		AD20	FINANCIAL ACCOUNTING	ACCT/FISCAL ANALYST I	8/30/05
9999	00		AD25	FINANCIAL ACCOUNTING	ACCTNT/FISCAL ANALYST III	8/30/05
9999	00		AA50	VICTIM SERVICES	ADMIN SPEC C	9/14/05
9999	00		UA03	OFFICE OF MEDICAL & HEALTH SERVICES	DIR MEDICAL & PROF SVCS	1/3/06
9999	00		AH40	INMATE SERVICES	PROGRAM COORD II	1/17/06
9999	00		KD40	LOWER SAVANNAH PRE-RELEASE CENTER	VEHICLE OPERATOR	1/17/06
9999	00		KD40	LOWER SAVANNAH PRE-RELEASE CENTER	VEHICLE OPERATOR	2/17/06
9999	00		AH30	INDUSTRIES ADMINISTRATION NN	INDUSTRIES TRUCK DRIVER	3/1/06
9999	00		AH30	INDUSTRIES ADMINISTRATION NN	INDUSTRIES TRUCK DRIVER	3/1/06
9999	00		AH30	MCCORMICK CORRECTIONAL INSTITUTION	INDUSTRIES SUPERVISOR II	3/16/06
9999	00		AH30	PERRY CORRECTIONAL INSTITUTION	INDUSTRIES SUPERVISOR II	3/16/06
9999	00		KD40	LOWER SAVANNAH PRE-RELEASE CENTER	VEHICLE OPERATOR	4/1/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06

JOB CLASS	BAND	LEVEL	APP CLASS	LOCATION	INTERNAL TITLE	CREATE DATE
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA10	MEDICAL SUPPORT	LPN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06

		L				
	B	E				
	A	V				
JOB	N	E	APP		INTERNAL	CREATE
CLASS	D	L	CLASS	LOCATION	TITLE	DATE
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		EA20	MEDICAL SUPPORT	RN	4/6/06
9999	00		AH30	INDUSTRIES ADMINISTRATION NN	INDUSTRIES SUPV I	4/19/06
9999	00		AH30	INDUSTRIES ADMINISTRATION NN	INDUSTRIES SUPV I	4/19/06
9999	00		KC40	FACILITIES MANAGEMENT	TRADES SPEC IV	6/30/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06

RESPONSE TO QUESTION # 3 - NEW POSITIONS CREATED 7/2/03 TO PRESENT (FTE/TEMP/TEMP GRANT) SORTED BY CREATE DATE

		L				
	B	E				
	A	V				
JOB	N	E	APP		INTERNAL	CREATE
CLASS	D	L	CLASS	LOCATION	TITLE	DATE
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06

RESPONSE TO QUESTION # 3 - NEW POSITIONS CREATED 7/2/03 TO PRESENT (FTE/TEMP/TEMP GRANT) - SORTED BY CREATE DATE

		L				
	B	E				
	A	V				
JOB	N	E	APP		INTERNAL	CREATE
CLASS	D	L	CLASS	LOCATION	TITLE	DATE
JD30	03	E	JD30	SECURITY POOL POSITIONS - STATE FUNDED	OFFICER II	8/2/06

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

				L		
			B	E		
NEW			A	V		
JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
AH20	ADMINISTRATIVE MGR I	BRANCH CHIEF - PRINTING	07	B	INDUSTRIES ADMINISTRATION NN	6/2/03
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I (K-9 HANDLER)	04	E	INVESTIGATIONS	6/2/03
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	SECURITY	6/2/03
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	INVESTIGATIONS	6/2/03
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	INVESTIGATIONS	6/2/03
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	TYGER RIVER CORRECTIONAL INSTITUTION	6/2/03
JA15	INVESTIGATOR III	INVESTIGATOR III	05	B	INVESTIGATIONS	6/17/03
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST	6/17/03
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION	6/17/03
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	TRENTON CORRECTIONAL INSTITUTION	6/17/03
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	ALLENDALE CORRECTIONAL INSTITUTION	6/17/03
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	GOODMAN CORRECTIONAL INSTITUTION	6/17/03
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION	6/17/03
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TYGER RIVER CORRECTIONAL INSTITUTION	6/17/03
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION	7/2/03
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST	7/2/03
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	RIDGELAND CORR INSTITUTION	7/2/03
JD60	WARDEN II	WARDEN V	08	B	BROAD RIVER CORRECTIONAL INSTITUTION	7/2/03
KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	TYGER RIVER CORRECTIONAL INSTITUTION	7/2/03
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION	7/17/03
JD30	CORRECTIONAL OFFICER I	CADET	03	C	PERRY CORRECTIONAL INSTITUTION	7/17/03
JD30	CORRECTIONAL OFFICER I	CADET	03	C	BROAD RIVER CORRECTIONAL INSTITUTION	7/17/03
JD30	CORRECTIONAL OFFICER I	CADET	03	C	BROAD RIVER CORRECTIONAL INSTITUTION	7/17/03
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	GOODMAN CORRECTIONAL INSTITUTION	7/17/03
AC09	SUPPLY MANAGER II	SUPPLY MGR II	05	B	COMMISSARY WHSE INVENTORY/DISTRIBUTION	8/2/03
AH45	PROGRAM MANAGER I	ASST DIR - INMATE RECORDS	07	B	DIV OF CLASSIFICATION & INMATE RECORD	8/2/03
AH45	PROGRAM MANAGER I	ASST DIR - KCI R&E CENTER	07	B	KIRKLAND CORRECTIONAL INSTITUTION	8/2/03
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION	8/2/03

RESPONSE TO QUESTION 3B POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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			B	E		
NEW			A	V		
JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
AJ42	INFO RESOURCE CONSULT I	INFO RESOURCE CONSULT I	05	C	RESOURCE & INFORMATION MGMT - ADMINIST	8/17/03
AJ42	INFO RESOURCE CONSULT I	INFO RESOURCE CONSULT I	05	A	RESOURCE & INFORMATION MGMT - ADMINIST	8/17/03
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	CATAWBA PRE-RELEASE CENTER	8/17/03
JD30	CORRECTIONAL OFFICER I	CADET	03	C	MANNING CORRECTIONAL INSTITUTION	8/17/03
JD30	CORRECTIONAL OFFICER I	CADET	03	C	NORTHSIDE CORRECTIONAL INSTITUTION	8/17/03
JD30	CORRECTIONAL OFFICER I	CADET	03	C	MANNING CORRECTIONAL INSTITUTION	8/17/03
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION	8/17/03
AH35	PROGRAM COORDINATOR I	BROODER/LAYER FACILITY MG	05	E	MAC DOUGALL FARM OPER	9/2/03
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION	9/2/03
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER CORRECTIONAL INSTITUTION	9/2/03
EC10	MEDICAL ASSISTANT TECH I	CNA	02	C	MENTAL HEALTH	9/17/03
AH10	ADMINISTRATIVE COORD I	ADMIN COORD I	05	A	DIVISION OF OPERATIONS	10/2/03
EA20	REGISTERED NURSE I	STAFF NURSE	05	A	MENTAL HEALTH	10/2/03
JD30	CORRECTIONAL OFFICER I	CADET	03	C	RIDGELAND CORR INSTITUTION	10/2/03
JD30	CORRECTIONAL OFFICER I	CADET	03	C	TYGER RIVER CORRECTIONAL INSTITUTION	10/2/03
JD55	WARDEN I	ASSOC WARDEN III	07	B	KIRKLAND CORRECTIONAL INSTITUTION	10/2/03
JD55	WARDEN I	ASSOC WARDEN III	07	B	KIRKLAND CORRECTIONAL INSTITUTION	10/2/03
KB30	FOOD SERVICE SPECIALIST VI	FOOD SERVICE SPEC VI	06	A	RIDGELAND CORR INSTITUTION	10/2/03
AH15	ADMINISTRATIVE COORD II	BUSINESS MANAGER	06	D	ALLENDALE CORRECTIONAL INSTITUTION	10/17/03
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	CATAWBA PRE-RELEASE CENTER	10/17/03
KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	NORTHSIDE CORRECTIONAL INSTITUTION	10/17/03
JD30	CORRECTIONAL OFFICER I	CADET	03	C	TRENTON CORRECTIONAL INSTITUTION	11/2/03
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER CORRECTIONAL INSTITUTION	11/2/03
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER CORRECTIONAL INSTITUTION	11/2/03
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	KERSHAW CORRECTIONAL INSTITUTION	11/2/03
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	KIRKLAND CORRECTIONAL INSTITUTION	11/2/03
JD30	CORRECTIONAL OFFICER I	CADET	03	C	ALLENDALE CORRECTIONAL INSTITUTION	11/17/03
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WALDEN CORRECTIONAL INSTITUTION	11/17/03

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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			B	E		
NEW			A	V		
JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WALDEN CORRECTIONAL INSTITUTION	11/17/03
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION	11/17/03
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WALDEN CORRECTIONAL INSTITUTION	12/2/03
JD30	CORRECTIONAL OFFICER I	CADET	03	C	ALLENDALE CORRECTIONAL INSTITUTION	12/2/03
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	MANNING CORRECTIONAL INSTITUTION	12/2/03
AD55	HEARINGS OFFICER III	HEARINGS OFFICER III	06	D	DIVISION OF OPERATIONS	12/17/03
AD55	HEARINGS OFFICER III	HEARINGS OFFICER III	06	D	DIVISION OF OPERATIONS	12/17/03
AD55	HEARINGS OFFICER III	HEARINGS OFFICER III	06	D	DIVISION OF OPERATIONS	12/17/03
AD55	HEARINGS OFFICER III	HEARINGS OFFICER III	06	D	DIVISION OF OPERATIONS	12/17/03
AD55	HEARINGS OFFICER III	HEARINGS OFFICER III	06	D	DIVISION OF OPERATIONS	12/17/03
AD55	HEARINGS OFFICER III	HEARINGS OFFICER III	06	D	DIVISION OF OPERATIONS	12/17/03
AD55	HEARINGS OFFICER III	HEARINGS OFFICER III	06	D	DIVISION OF OPERATIONS	12/17/03
AD55	HEARINGS OFFICER III	HEARINGS OFFICER III	06	D	DIVISION OF OPERATIONS	12/17/03
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	NORTHSIDE CORRECTIONAL INSTITUTION	12/17/03
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	WATEREE RIVER CORRECTIONAL INSTITUTION	12/17/03
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	TRENTON CORRECTIONAL INSTITUTION	12/17/03
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER CORRECTIONAL INSTITUTION	12/17/03
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	BROAD RIVER CORRECTIONAL INSTITUTION	12/17/03
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LEE CORRECTIONAL INSTITUTION	12/17/03
AH30	PROGRAM ASSISTANT	INDUSTRIES SUPV I	04	D	TYGER RIVER CORRECTIONAL INSTITUTION	1/2/04
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	PERRY CORRECTIONAL INSTITUTION	1/2/04
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION	1/2/04
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	RIDGELAND CORR INSTITUTION	1/17/04
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION	1/17/04
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	CAMPBELL PRE-RELEASE CENTER	1/17/04
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER CORRECTIONAL INSTITUTION	1/17/04
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION	2/2/04

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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			B	E		
NEW			A	V		
JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION	2/2/04
AA50	ADMIN SPECIALIST II	ADMIN SPEC C	03	C	KIRKLAND CORRECTIONAL INSTITUTION	2/17/04
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	NORTHSIDE CORRECTIONAL INSTITUTION	2/17/04
JD30	CORRECTIONAL OFFICER I	CADET	03	C	RIDGELAND CORR INSTITUTION	2/17/04
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST	2/17/04
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	PERRY CORRECTIONAL INSTITUTION	3/2/04
KC50	TRADES SPECIALIST V	TRADES SPEC V	05	C	CIV LABOR POOL 9511	3/2/04
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	PALMER PRE-RELEASE CENTER	3/17/04
JD60	WARDEN II	WARDEN IV	08	A	LEATH CORR INSTIT (WOMEN)	3/17/04
JD60	WARDEN II	WARDEN IV	08	A	TRENTON CORRECTIONAL INSTITUTION	3/17/04
KC50	TRADES SPECIALIST V	TRADES SPEC V	05	C	CIV LABOR POOL 9511	3/17/04
LA97	FARM FOREMAN II	BROODER/LAYER ASST MGR	04	D	MAC DOUGALL FARM OPER	3/17/04
LA97	FARM FOREMAN II	BROODER/LAYER ASST MGR	04	D	MAC DOUGALL FARM OPER	3/17/04
AH30	PROGRAM ASSISTANT	INDUSTRIES SUPV II	04	A	MCCORMICK CORRECTIONAL INSTITUTION	4/17/04
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	RIDGELAND CORR INSTITUTION	4/17/04
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION	4/17/04
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	PALMER PRE-RELEASE CENTER	4/17/04
AA50	ADMIN SPECIALIST II	ADMIN SPEC B	03	A	LEE CORRECTIONAL INSTITUTION	5/2/04
AH25	ADMINISTRATIVE MGR II	OPERATIONS COORDINATOR	08	B	DIVISION OF OPERATIONS	5/17/04
JC20	LE OFFICER - K 9 AGENT	LE OFFICER (K 9 AGENT)	05	A	INVESTIGATIONS	5/17/04
JC20	LE OFFICER - K 9 AGENT	LE OFFICER (K 9 AGENT)	05	A	INVESTIGATIONS	5/17/04
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION	5/17/04
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	COASTAL PRE-RELEASE CENTER	6/17/04
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION	7/2/04
JD30	CORRECTIONAL OFFICER I	CADET	03	C	TYGER RIVER CORRECTIONAL INSTITUTION	7/2/04
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MACDOUGALL CORRECTIONAL INST	7/2/04
AH40	PROGRAM COORDINATOR II	SUPV OF GRNDS & SPEC SVCS	06	B	INMATE SERVICES	7/17/04
JD30	CORRECTIONAL OFFICER I	CADET	03	C	TYGER RIVER CORRECTIONAL INSTITUTION	7/17/04

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

NEW JOB CLAS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION	EFF DATE
JD30	CORRECTIONAL OFFICER I	CADET	03	C	TYGER RIVER CORRECTIONAL INSTITUTION	7/17/04
JD30	CORRECTIONAL OFFICER I	CADET	03	C	TYGER RIVER CORRECTIONAL INSTITUTION	7/17/04
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	LOWER SAVANNAH PRE-RELEASE CENTER	7/17/04
JD50	CORRECTIONAL OFFICER IV	CAPTAIN	06	C	KIRKLAND CORRECTIONAL INSTITUTION	7/17/04
JD55	WARDEN I	WARDEN III	07	D	STEVENSON CORRECTIONAL INSTITUTION	7/17/04
JD55	WARDEN I	WARDEN II	07	C	PALMER PRE RELEASE CENTER	7/17/04
GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS III	05	A	BROAD RIVER CORRECTIONAL INSTITUTION	8/17/04
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION	8/17/04
JD30	CORRECTIONAL OFFICER I	CADET	03	C	ALLENDALE CORRECTIONAL INSTITUTION	8/17/04
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	8/17/04
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	WATEREE RIVER CORRECTIONAL INSTITUTION	8/17/04
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	WATEREE RIVER CORRECTIONAL INSTITUTION	8/17/04
JD40	CORRECTIONAL OFFICER III	VOCATIONAL ED TRAINER	05	B	WALDEN CORRECTIONAL INSTITUTION	8/17/04
JD40	CORRECTIONAL OFFICER III	VOCATIONAL ED TRAINER	05	B	BROAD RIVER CORRECTIONAL INSTITUTION	8/17/04
JD40	CORRECTIONAL OFFICER III	VOCATIONAL ED TRAINER	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	8/17/04
JD40	CORRECTIONAL OFFICER III	VOCATIONAL ED TRAINER	05	B	ALLENDALE CORRECTIONAL INSTITUTION	8/17/04
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	KIRKLAND CORRECTIONAL INSTITUTION	8/17/04
JD40	CORRECTIONAL OFFICER III	VOCATIONAL ED TRAINER	05	B	BROAD RIVER CORRECTIONAL INSTITUTION	8/17/04
AC07	SUPPLY MANAGER I	SUPPLY MANAGER	04	E	KIRKLAND CORRECTIONAL INSTITUTION	9/2/04
AD25	ACCTNT/FISCAL ANALYST III	ACCOUNTANT III	06	B	FINANCIAL ACCOUNTING	9/2/04
AE20	ATTORNEY II	ATTORNEY II	06	C	OFFICE OF GENERAL COUNSEL	9/2/04
JD30	CORRECTIONAL OFFICER I	CADET	03	C	KIRKLAND CORRECTIONAL INSTITUTION	9/2/04
JD30	CORRECTIONAL OFFICER I	CADET	03	C	BROAD RIVER CORRECTIONAL INSTITUTION	9/2/04
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MCCORMICK CORRECTIONAL INSTITUTION	9/2/04
JD40	CORRECTIONAL OFFICER III	VOCATIONAL ED TRAINER	05	B	MANNING CORRECTIONAL INSTITUTION	9/2/04
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LEE CORRECTIONAL INSTITUTION	9/2/04
AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	C	DIVISION OF OPERATIONS	9/17/04
GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	STEVENSON CORRECTIONAL INSTITUTION	9/17/04

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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			B	E		
NEW			A	V		
JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
JD30	CORRECTIONAL OFFICER I	CADET	03	C	TURBEVILLE CORRECTIONAL INSTITUTION	9/17/04
JD30	CORRECTIONAL OFFICER I	CADET	03	C	TURBEVILLE CORRECTIONAL INSTITUTION	9/17/04
AG05	HUMAN RESOURCE SPECIALIST	BENEFITS ADMINISTRATOR	04	B	HUMAN RESOURCES ADMINISTRATION	10/2/04
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	WATEREE RIVER CORRECTIONAL INSTITUTION	10/17/04
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	10/17/04
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TYGER RIVER CORRECTIONAL INSTITUTION	10/17/04
AH15	ADMINISTRATIVE COORD II	BUSINESS MGR	06	A	COASTAL OFFICE	11/2/04
AH40	PROGRAM COORDINATOR II	PROGRAM COORDINATOR II	06	C	INMATE SERVICES	11/2/04
GA40	HUMAN SERVICES SPEC II	CLIN CORR COUNS I	04	A	MENTAL HEALTH	11/2/04
JD30	CORRECTIONAL OFFICER I	CADET	03	C	TURBEVILLE CORRECTIONAL INSTITUTION	11/2/04
JD30	CORRECTIONAL OFFICER I	CADET	03	C	COASTAL PRE-RELEASE CENTER	11/2/04
JD50	CORRECTIONAL OFFICER IV	CAPTAIN	06	C	STEVENSON CORRECTIONAL INSTITUTION	11/2/04
KA30	BUILDING/GROUNDS MGR	BLDG/GRNDS MGR	06	A	FACILITIES MANAGEMENT	11/2/04
AH30	PROGRAM ASSISTANT	TRACTOR TRAILER DRIVER	04	C	CANTEEN WHSE INVENTORY/DISTRIBUTION	11/17/04
GA50	HUMAN SERVICES COORD I	CCC IV	05	D	MENTAL HEALTH	11/17/04
JD30	CORRECTIONAL OFFICER I	CADET	03	C	TURBEVILLE CORRECTIONAL INSTITUTION	11/17/04
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TRENTON CORRECTIONAL INSTITUTION	11/17/04
JD40	CORRECTIONAL OFFICER III	VOCATIONAL ED TRAINER	05	B	MCCORMICK CORRECTIONAL INSTITUTION	11/17/04
JD55	WARDEN I	WARDEN II	07	D	CAMPBELL PRE-RELEASE CENTER	11/17/04
AH15	ADMINISTRATIVE COORD II	ADMIN COORD	06	B	OFFICE OF INSPECTOR GENERAL	12/2/04
EB50	PHYSICIAN II	PSYCHIATRIST II	10	A	BROAD RIVER CORRECTIONAL INSTITUTION	12/2/04
KA30	BUILDING/GROUNDS MGR	BLDG/GRNDS MANAGER	06	A	FACILITIES MANAGEMENT	12/2/04
AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST I	04	D	PALMER PRE-RELEASE CENTER	12/17/04
AH35	PROGRAM COORDINATOR I	CASE MANAGER	05	D	KERSHAW CORRECTIONAL INSTITUTION	12/17/04
EA80	NURSE ADMINISTRATOR/MGR II	HEALTH CARE AUTHORITY III	07	D	LIEBER CORRECTIONAL INSTITUTION	12/17/04
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION	12/17/04
AH40	PROGRAM COORDINATOR II	ASSOCIATE WARDEN	06	C	COASTAL PRE-RELEASE CENTER	1/2/05
AH40	PROGRAM COORDINATOR II	ASSOCIATE WARDEN	06	E	COASTAL PRE-RELEASE CENTER	1/2/05

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
GA40	HUMAN SERVICES SPEC II	COMMUNITY PROG SUPV	04	C	CATAWBA PRE-RELEASE CENTER	1/2/05
JA15	INVESTIGATOR III	INVESTIGATOR	05	B	INVESTIGATIONS	1/17/05
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION	1/17/05
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION	1/17/05
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION	1/17/05
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	COASTAL PRE-RELEASE CENTER	1/17/05
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION	1/17/05
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION	1/17/05
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	MANNING CORRECTIONAL INSTITUTION	1/17/05
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	MANNING CORRECTIONAL INSTITUTION	1/17/05
KA30	BUILDING/GROUNDS MGR	BUILDING/GROUNDS MGR	06	A	CIV LABOR POOL 9511	1/17/05
AJ10	INFO TECHNOLOGY MGR I	INFO TECH MGR I	07	E	NETWORK AND TELECOMMUNICATIONS	2/2/05
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	MACDOUGALL CORRECTIONAL INST	2/2/05
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	PERRY CORRECTIONAL INSTITUTION	2/2/05
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	TRENTON CORRECTIONAL INSTITUTION	2/2/05
JD40	CORRECTIONAL OFFICER III	VOCATIONAL ED TRAINER	05	B	MCCORMICK CORRECTIONAL INSTITUTION	2/2/05
HD65	ENG/ASSOC ENG II	ENG/ASSOC ENG II	06	A	FACILITIES MANAGEMENT	2/17/05
JA15	INVESTIGATOR III	INVESTIGATOR III	05	C	INVESTIGATIONS	2/17/05
JA15	INVESTIGATOR III	INVESTIGATOR III	05	D	INVESTIGATIONS	2/17/05
JA15	INVESTIGATOR III	INVESTIGATOR III	05	C	INVESTIGATIONS	2/17/05
JA15	INVESTIGATOR III	INVESTIGATOR III	05	C	INVESTIGATIONS	2/17/05
JA15	INVESTIGATOR III	INVESTIGATOR III	05	D	INVESTIGATIONS	2/17/05
JA15	INVESTIGATOR III	INVESTIGATOR III	05	C	INVESTIGATIONS	2/17/05
JA15	INVESTIGATOR III	INVESTIGATOR III	05	D	INVESTIGATIONS	2/17/05
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION	2/17/05
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION	2/17/05
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE CORRECTIONAL INSTITUTION	2/17/05
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEE CORRECTIONAL INSTITUTION	2/17/05

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

NEW JOB CLAS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION	EFF DATE
JD60	WARDEN II	WARDEN V	08	B	LEE CORRECTIONAL INSTITUTION	2/17/05
KA30	BUILDING/GROUNDS MGR	BLDG/GRNDS MGR	06	A	FACILITIES MANAGEMENT	2/17/05
KA30	BUILDING/GROUNDS MGR	BLDG/GRNDS MGR	06	A	FACILITIES MANAGEMENT	2/17/05
AH10	ADMINISTRATIVE COORD I	CANTEEN MGR	05	C	EVANS CORRECTIONAL INSTITUTION	3/2/05
AH25	ADMINISTRATIVE MGR II	OPERATIONS COORDINATOR	08	B	DIVISION OF OPERATIONS	3/2/05
AH50	PROGRAM MANAGER II	DIV DIR - CLASS & RECORDS	08	D	DIV OF CLASSIFICATION & INMATE RECORD	3/2/05
GA40	HUMAN SERVICES SPEC II	COMMUNITY PGM SUP	04	E	CAMPBELL PRE RELEASE CENTER	3/2/05
HD65	ENG/ASSOC ENG II	ENG/ASSOC ENG II	06	A	CONSTRUCTION ADMINISTRATION	3/2/05
KA30	BUILDING/GROUNDS MGR	BUILDING/GROUNDS MGR	06	A	CONSTRUCTION ADMINISTRATION	3/2/05
KA30	BUILDING/GROUNDS MGR	BUILDING/GROUNDS MGR	06	A	RIDGELAND CORR INSTITUTION	3/2/05
KA30	BUILDING/GROUNDS MGR	BUILDING/GROUNDS MGR	06	A	FACILITIES MANAGEMENT	3/2/05
AH50	PROGRAM MANAGER II	DIRECTOR OF NURSING	08	A	OFFICE OF MEDICAL & HEALTH SERVICES	3/17/05
HD65	ENG/ASSOC ENG II	ENG/ASSOC ENG	06	A	FACILITIES MANAGEMENT	3/17/05
JD50	CORRECTIONAL OFFICER IV	MAJOR	06	E	LEATH CORR INSTIT (WOMEN)	3/17/05
JD55	WARDEN I	ASSOC WARDEN III	07	B	LEATH CORR INSTIT (WOMEN)	3/17/05
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION	3/17/05
AA50	ADMIN SPECIALIST II	ADMIN SPEC C	03	C	KIRKLAND CORRECTIONAL INSTITUTION	4/2/05
AD12	AUDITOR IV	AUDITOR IV	06	B	OFFICE OF BUDGET AND RESOURCE	4/2/05
AH20	ADMINISTRATIVE MGR I	FACILITIES SUPPORT MANAGE	07	A	FACILITIES MANAGEMENT	4/2/05
AH25	ADMINISTRATIVE MGR II	PHYSICAL PLANT MANAGER	08	A	FACILITIES MANAGEMENT	4/2/05
AH50	PROGRAM MANAGER II	DIRECTOR - SUP SER/FAC MGT	08	D	SUPPORT SERVICES ADMINISTRATION	4/2/05
HD65	ENG/ASSOC ENG II	SHOP MANAGER ELEC/ELECTR	06	C	FACILITIES MANAGEMENT	4/2/05
HD65	ENG/ASSOC ENG II	ENG/ASSOC ENG II	06	E	CONSTRUCTION ADMINISTRATION	4/2/05
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	MACDOUGALL CORRECTIONAL INST	4/2/05
JD50	CORRECTIONAL OFFICER IV	MAJOR	06	E	LIEBER CORRECTIONAL INSTITUTION	4/2/05
KC50	TRADES SPECIALIST V	TRADES SPEC V	05	A	WATEREE FARM OPERATIONS	4/2/05
UB05	SPECIAL EDUCATION TEACHER	SPECIAL ED TEACHER	00		TURBEVILLE CORRECTIONAL INSTITUTION	4/2/05
AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	D	GOODMAN CORRECTIONAL INSTITUTION	4/17/05

RESPONSE TO QUESTION 3B POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
JD30	CORRECTIONAL OFFICER I	CADET	03	C	TRENTON CORRECTIONAL INSTITUTION	4/17/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	TRENTON CORRECTIONAL INSTITUTION	4/17/05
KA30	BUILDING/GROUNDS MGR	BUILDING/GROUNDS MGR	06	A	FACILITIES MANAGEMENT	4/17/05
AH25	ADMINISTRATIVE MGR II	DIRECTOR-MENTAL HEALTH	08	B	MENTAL HEALTH	4/26/05
AA75	ADMINISTRATIVE ASSISTANT	ADMINISTRATIVE ASST	04	E	PURCHASING	5/2/05
AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	D	KERSHAW CORRECTIONAL INSTITUTION	5/2/05
AH30	PROGRAM ASSISTANT	DRIVER	04	E	SUPPORT SERVICES ADMINISTRATION	5/2/05
EA80	NURSE ADMINISTRATOR/MGR II	ACTING DIRECTOR - NURSING	07	E	OFFICE OF MEDICAL & HEALTH SERVICES	5/2/05
JA15	INVESTIGATOR III	INVESTIGATOR III	05	B	INVESTIGATIONS	5/2/05
KB15	FOOD SVC SPECIALIST III	FOOD SVC SUPRV III	03	E	EVANS CORRECTIONAL INSTITUTION	5/2/05
AG45	TRNG & DEVELOPMENT DIR II	DIV DIR - TRAINING	07	E	TRAINING	5/17/05
AH40	PROGRAM COORDINATOR II	BRANCH CHIEF-POLICY DEV	06	C	POLICY DEVELOPMENT	5/17/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	NORTHSIDE CORRECTIONAL INSTITUTION	5/17/05
JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT III	05	E	TRAINING	5/17/05
JD50	CORRECTIONAL OFFICER IV	ADMIN MAJOR	06	D	TRAINING	5/17/05
JD55	WARDEN I	WARDEN I	07	A	CATAWBA PRE-RELEASE CENTER	5/17/05
JD50	CORRECTIONAL OFFICER IV	CAPTAIN II	06	C	LEE CORRECTIONAL INSTITUTION	6/2/05
AH30	PROGRAM ASSISTANT	TRACTOR TRAILER DRIVER	04	E	SUPPORT SERVICES ADMINISTRATION	6/17/05
AJ42	INFO RESOURCE CONSULT I	INFO RES COUNSULTANT I	05	A	RESOURCE & INFORMATION MGMT - ADMINIST	6/17/05
EA80	NURSE ADMINISTRATOR/MGR II	NURSING COORDINATOR	07	E	OFFICE OF MEDICAL & HEALTH SERVICES	6/17/05
EC10	MEDICAL ASSISTANT TECH I	DENTAL ASSISTANT I	02	C	TURBEVILLE CORRECTIONAL INSTITUTION	6/17/05
JA35	FINGERPRINT SPECIALIST	FINGERPRINT SPEC	03	E	KIRKLAND CORRECTIONAL INSTITUTION	6/17/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	BROAD RIVER CORRECTIONAL INSTITUTION	6/17/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	TYGER RIVER CORRECTIONAL INSTITUTION	6/17/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	LIEBER CORRECTIONAL INSTITUTION	6/17/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	BROAD RIVER CORRECTIONAL INSTITUTION	6/17/05
JD50	CORRECTIONAL OFFICER IV	ADMIN CAPTAIN II	06	C	TRAINING	6/17/05
KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	EVANS CORRECTIONAL INSTITUTION	6/17/05

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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CLAS	TITLE	TITLE	D	L	LOCATION	DATE
KC50	TRADES SPECIALIST V	TRADES SPEC V	05	B	TRENTON CORRECTIONAL INSTITUTION	6/17/05
UB02	CERTIFIED TEACHER	CERTIFIED TEACHER	00		KIRKLAND CORRECTIONAL INSTITUTION	7/1/05
UB02	CERTIFIED TEACHER	CERTIFIED TEACHER	00		LEE CORRECTIONAL INSTITUTION	7/1/05
UB02	CERTIFIED TEACHER	CERTIFIED TEACHER	00		CAMPBELL PRE-RELEASE CENTER	7/1/05
UB02	CERTIFIED TEACHER	CERTIFIED TEACHER	00		PERSONNEL POOL POSITIONS	7/1/05
UB02	CERTIFIED TEACHER	CERTIFIED TEACHER	00		LEE CORRECTIONAL INSTITUTION	7/1/05
AE50	ATTORNEY V	GENERAL COUNSEL	09	A	OFFICE OF GENERAL COUNSEL	7/2/05
AH30	PROGRAM ASSISTANT	CASEWORKER	04	C	LIVESAY PRE-RELEASE CENTER	7/2/05
AH40	PROGRAM COORDINATOR II	ASSOC WARDEN I	06	E	CAMILLE GRAHAM CORRECTIONAL INST	7/2/05
JB50	ENVIR/HEALTH MGR II	ENVIR/HEALTH MGR II	06	A	ALLENDALE CORRECTIONAL INSTITUTION	7/2/05
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	EVANS CORRECTIONAL INSTITUTION	7/2/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	WATEREE RIVER CORRECTIONAL INSTITUTION	7/2/05
UB02	CERTIFIED TEACHER	CERTIFIED TEACHER	00		PERSONNEL POOL POSITIONS	7/2/05
UB02	CERTIFIED TEACHER	CERTIFIED TEACHER	00		PERSONNEL POOL POSITIONS	7/2/05
AD22	ACCTNT/FISCAL ANALYST II	ADMIN COORD	05	A	CIV LABOR POOL 9511	7/17/05
AH10	ADMINISTRATIVE COORD I	ADMIN COORD I	05	A	FACILITIES MANAGEMENT	7/17/05
AH30	PROGRAM ASSISTANT	INDUSTRIES SUPV I	04	A	MCCORMICK CORRECTIONAL INSTITUTION	7/17/05
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	COASTAL PRE-RELEASE CENTER	7/17/05
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	MACDOUGALL CORRECTIONAL INST	7/17/05
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION	7/17/05
KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	MANNING CORRECTIONAL INSTITUTION	7/17/05
KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	TRENTON CORRECTIONAL INSTITUTION	7/17/05
KC50	TRADES SPECIALIST V	TRADES SUPV I	05	A	VEHICLE MAINTENANCE	7/17/05
AH10	ADMINISTRATIVE COORD I	ACCTNT/FISCAL ANALYST II	05	A	CIV LABOR POOL 9511	8/2/05
AH30	PROGRAM ASSISTANT	TRACTOR TRAILER DRIVER	04	E	PERSONNEL POOL POSITIONS	8/2/05
AH30	PROGRAM ASSISTANT	TRACTOR TRAILOR DRIVER	04	E	CANTEEN WHSE INVENTORY/DISTRIBUTION	8/2/05
AH30	PROGRAM ASSISTANT	TRUCK DRIVER	04	E	CANTEEN WHSE INVENTORY/DISTRIBUTION	8/2/05
AH30	PROGRAM ASSISTANT	TRACTOR TRAILER DRIVER	04	E	CANTEEN WHSE INVENTORY/DISTRIBUTION	8/2/05

RESPONSE TO QUESTION 3B POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
GA50	HUMAN SERVICES COORD I	CLINICAL CORR COUNSELOR IV	05	D	CAMILLE GRAHAM CORRECTIONAL INST	8/2/05
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	EVANS CORRECTIONAL INSTITUTION	8/2/05
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION	8/2/05
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	WALDEN CORRECTIONAL INSTITUTION	8/2/05
JD40	CORRECTIONAL OFFICER III	VOCATIONAL ED TRAINER	05	B	EVANS CORRECTIONAL INSTITUTION	8/2/05
AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	D	OFFICE OF GENERAL COUNSEL	8/17/05
AH35	PROGRAM COORDINATOR I	CASE MANAGER	05	B	MACDOUGALL CORRECTIONAL INST	8/17/05
AJ18	DATA COORDINATOR II	DATA COOR II	04	A	FACILITIES MANAGEMENT	8/17/05
JA15	INVESTIGATOR III	INVESTIGATOR II	05	B	INVESTIGATIONS	8/17/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	WALDEN CORRECTIONAL INSTITUTION	8/17/05
JD55	WARDEN I	WARDEN I	07	C	CAMPBELL PRE-RELEASE CENTER	8/17/05
JD55	WARDEN I	ASSOCIATE WARDEN	07	B	ALLENDALE CORRECTIONAL INSTITUTION	8/17/05
AD22	ACCTNT/FISCAL ANALYST II	SR ACCOUNTANT	05	E	FINANCIAL ACCOUNTING	9/2/05
EC50	RECREATION SPECIALIST III	RECREATION SPEC III	04	E	RIDGELAND CORR INSTITUTION	9/2/05
GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	LEE CORRECTIONAL INSTITUTION	9/2/05
HD65	ENG/ASSOC ENG II	ENG/ASSOC ENG II	06	A	FACILITIES MANAGEMENT	9/2/05
JB50	ENVIR/HEALTH MGR II	ENV/HLTH MGR II	06	A	WATEREE RIVER CORRECTIONAL INSTITUTION	9/2/05
JB50	ENVIR/HEALTH MGR II	ENVIR/HEALTH MGR II	06	A	TYGER RIVER CORRECTIONAL INSTITUTION	9/2/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	LEE CORRECTIONAL INSTITUTION	9/2/05
JD35	CORRECTIONAL OFFICER II	SGT I	04	B	PALMER PRE-RELEASE CENTER	9/2/05
KA30	BUILDING/GROUNDS MGR	BUILDING/GROUNDS MGR	06	A	CAMILLE GRAHAM CORRECTIONAL INST	9/2/05
AA50	ADMIN SPECIALIST II	ADMIN SPEC C	03	C	WATEREE RIVER CORRECTIONAL INSTITUTION	9/17/05
AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	D	INVESTIGATIONS	9/17/05
AE10	ATTORNEY I	ATTORNEY I	05	C	OFFICE OF GENERAL COUNSEL	9/17/05
AG05	HUMAN RESOURCE SPECIALIST	SUPERVISOR - RECORDS	04	E	HUMAN RESOURCES ADMINISTRATION	9/17/05
AH35	PROGRAM COORDINATOR I	IMPACT CRIME COORD	05	C	VICTIM SERVICES	9/17/05
AJ42	INFO RESOURCE CONSULT I	INFO RESOURCE CONSULT I	05	E	NETWORK AND TELECOMMUNICATIONS	9/17/05
AJ42	INFO RESOURCE CONSULT I	INFO RESOURCE CONSULT I	05	E	NETWORK AND TELECOMMUNICATIONS	9/17/05

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JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
JA15	INVESTIGATOR III	INVESTIGATOR III	05	B	INVESTIGATIONS	9/17/05
JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	NORTHSIDE CORRECTIONAL INSTITUTION	9/17/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	MACDOUGALL CORRECTIONAL INST	9/17/05
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TRENTON CORRECTIONAL INSTITUTION	9/17/05
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	INVESTIGATIONS	9/17/05
KA25	BUILDING/GROUNDS SUPV II	SUPT OF GRNDS & SPEC SERV	05	B	INMATE SERVICES	9/17/05
KA30	BUILDING/GROUNDS MGR	BLDG GRNDS MANAGER	06	A	CIV LABOR POOL 9511	9/17/05
AA75	ADMINISTRATIVE ASSISTANT	BUSINESS ASSOC I	04	B	LEE CORRECTIONAL INSTITUTION	10/2/05
AD22	ACCTNT/FISCAL ANALYST II	FISCAL ANALYST II	05	D	FINANCIAL ACCOUNTING	10/2/05
AG10	HUMAN RESOURCE MANAGER I	HUMAN RESOURCE MGR	05	E	LIEBER CORRECTIONAL INSTITUTION	10/2/05
AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	E	FACILITIES MANAGEMENT	10/17/05
AH35	PROGRAM COORDINATOR I	VOCATIONAL INSTRUCTOR	05	B	PERRY CORRECTIONAL INSTITUTION	10/17/05
AH35	PROGRAM COORDINATOR I	VOCATIONAL INSTRUCTOR	05	B	NORTHSIDE CORRECTIONAL INSTITUTION	10/17/05
AH35	PROGRAM COORDINATOR I	VOCATIONAL INSTRUCTOR	05	B	PERRY CORRECTIONAL INSTITUTION	10/17/05
AH35	PROGRAM COORDINATOR I	VOCATIONAL INSTRUCTOR	05	B	MANNING CORRECTIONAL INSTITUTION	10/17/05
AH35	PROGRAM COORDINATOR I	VOCATIONAL INSTRUCTOR	05	B	EVANS CORRECTIONAL INSTITUTION	10/17/05
AH10	ADMINISTRATIVE COORD I	ADMINISTRATIVE COORDINATO	05	C	DIVISION OF PROGRAMS & SERVICES	11/2/05
HD65	ENG/ASSOC ENG II	ASSET CONTROL AREA MGR	06	C	FACILITIES MANAGEMENT	11/2/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	BROAD RIVER CORRECTIONAL INSTITUTION	11/2/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	BROAD RIVER CORRECTIONAL INSTITUTION	11/2/05
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	ALLENDALE CORRECTIONAL INSTITUTION	11/2/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	LEE CORRECTIONAL INSTITUTION	11/17/05
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MCCORMICK CORRECTIONAL INSTITUTION	11/17/05
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	WATKINS PRE-RELEASE CENTER	11/17/05
JD40	CORRECTIONAL OFFICER III	VOCATIONAL EDUCATION TRAI	05	B	LIEBER CORRECTIONAL INSTITUTION	11/17/05
AA75	ADMINISTRATIVE ASSISTANT	ADMINISTRATIVE ASSISTANT	04	A	COMMISSARY WHSE INVENTORY/DISTRIBUTION	12/2/05
AH35	PROGRAM COORDINATOR I	VOCATIONAL ED TRAINER	05	B	PERRY CORRECTIONAL INSTITUTION	12/2/05
AH35	PROGRAM COORDINATOR I	VOCATIONAL INSTRUCTOR	05	B	EVANS CORRECTIONAL INSTITUTION	12/2/05

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
AH35	PROGRAM COORDINATOR I	VOCATIONAL INSTRUCTOR	05	B	NORTHSIDE CORRECTIONAL INSTITUTION	12/2/05
AH35	PROGRAM COORDINATOR I	VOCATIONAL ED TRAINER	05	B	MANNING CORRECTIONAL INSTITUTION	12/2/05
JA15	INVESTIGATOR III	INVESTIGATOR	05	B	INVESTIGATIONS	12/2/05
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	CAMPBELL PRE-RELEASE CENTER	12/2/05
AA50	ADMIN SPECIALIST II	ADMIN SPEC C	03	C	MENTAL HEALTH	12/17/05
AA50	ADMIN SPECIALIST II	ADMIN SPEC C	03	C	KIRKLAND CORRECTIONAL INSTITUTION	12/17/05
AA50	ADMIN SPECIALIST II	ADMINISTRATIVE SPECIALIST	03	C	CAMPBELL PRE-RELEASE CENTER	12/17/05
AA50	ADMIN SPECIALIST II	ADMINISTRATIVE SPEC	03	D	HUMAN RESOURCES ADMINISTRATION	12/17/05
AH35	PROGRAM COORDINATOR I	CLASS CASEWORKER III	05	B	ALLENDALE CORRECTIONAL INSTITUTION	12/17/05
AH40	PROGRAM COORDINATOR II	FIELD SUPERVISOR	06	B	YOIP/YOA PROGRAM	12/17/05
EA80	NURSE ADMINISTRATOR/MGR II	NURSING COORDINATOR	07	E	OFFICE OF MEDICAL & HEALTH SERVICES	12/17/05
EB25	PHARMACIST	PHARMACIST	07	A	KIRKLAND CORRECTIONAL INSTITUTION	12/17/05
EB50	PHYSICIAN II	PSYCHIATRIST	10	D	MENTAL HEALTH	12/17/05
JA15	INVESTIGATOR III	INVESTIGATOR III	05	C	INVESTIGATIONS	12/17/05
JA15	INVESTIGATOR III	INVESTIGATOR III	05	C	INVESTIGATIONS	12/17/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	LIEBER CORRECTIONAL INSTITUTION	12/17/05
JD30	CORRECTIONAL OFFICER I	CADET	03	C	MANNING CORRECTIONAL INSTITUTION	12/17/05
AH35	PROGRAM COORDINATOR I	PROGRAM COORDINATOR	05	A	WATEREE FARM OPERATIONS	1/2/06
AJ07	APPLICATIONS ANALYST II	APPLICATIONS ANALYST II	06	D	SYSTEM DEVELOPMENT/SUPPORT	1/17/06
JD55	WARDEN I	ASSOC WARDEN III	07	B	KIRKLAND CORRECTIONAL INSTITUTION	1/17/06
UB04	VOCATIONAL TEACHER	VOCATIONAL TEACHER	00		TYGER RIVER CORRECTIONAL INSTITUTION	1/17/06
AA75	ADMINISTRATIVE ASSISTANT	ADMINISTRATIVE ASSISTANT	04	D	YOIP/YOA PROGRAM	2/2/06
AE10	ATTORNEY I	ATTORNEY I	05	C	OFFICE OF GENERAL COUNSEL	2/2/06
JD30	CORRECTIONAL OFFICER I	CADET	03	C	WATEREE RIVER CORRECTIONAL INSTITUTION	2/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

NEW JOB CLAS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION	EFF DATE
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	PERSONNEL POOL POSITIONS	2/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	SECURITY	2/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY	2/2/06
AC07	SUPPLY MANAGER I	SUPPLY MANAGER	04	A	LEE CORRECTIONAL INSTITUTION	2/17/06
AH25	ADMINISTRATIVE MGR II	DIRECTOR OF SECURITY	08	C	DIVISION OF OPERATIONS	2/17/06
AH35	PROGRAM COORDINATOR I	VOCATIONAL INSTRUCTOR	05	B	ALLENDALE CORRECTIONAL INSTITUTION	2/17/06
AJ20	SYSTEM SUPPORT TECH	SYSTEM SUPPORT TECH	05	C	NETWORK AND TELECOMMUNICATIONS	2/17/06
AJ20	SYSTEM SUPPORT TECH	SYSTEM SUPPORT TECH	05	C	NETWORK AND TELECOMMUNICATIONS	2/17/06
JD30	CORRECTIONAL OFFICER I	CADET	03	C	KERSHAW CORRECTIONAL INSTITUTION	2/17/06
AC07	SUPPLY MANAGER I	SUPPLY MANAGER I	04	A	TURBEVILLE CORRECTIONAL INSTITUTION	3/2/06
AD28	ACCTNT/FISCAL MGR I	ACCT/FISCAL MANAGER I	07	A	FINANCIAL ACCOUNTING	3/2/06
AH55	PROGRAM MANAGER III	DIRECTOR DIV OF OPER	09	C	DIVISION OF OPERATIONS	3/2/06
EA30	REGISTERED NURSE II	RN II	06	A	MACDOUGALL CORRECTIONAL INST	3/2/06
EA80	NURSE ADMINISTRATOR/MGR II	NURSE ADMIN/MANAGER II	07	B	MACDOUGALL CORRECTIONAL INST	3/2/06

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

NEW JOB CLAS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION	EFF DATE
EA80	NURSE ADMINISTRATOR/MGR II	NURSING COORDINATOR	07	D	OFFICE OF MEDICAL & HEALTH SERVICES	3/2/06
JC30	LAW ENF OFFICER III	LE OFFICER III	06	C	INVESTIGATIONS	3/2/06
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TRENTON CORRECTIONAL INSTITUTION	3/2/06
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TRENTON CORRECTIONAL INSTITUTION	3/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MCCORMICK CORRECTIONAL INSTITUTION	3/2/06
JD40	CORRECTIONAL OFFICER III	ADMIN LT I	05	B	LEATH CORR INSTIT (WOMEN)	3/2/06
AA75	ADMINISTRATIVE ASSISTANT	ADMINISTRATIVE ASSISTANT	04	D	STEVENSON CORRECTIONAL INSTITUTION	3/17/06
AD30	ACCTNT/FISCAL MGR II	DIRECTOR - BUDGET/FINANCE	08	C	FINANCIAL ACCOUNTING	3/17/06
GA40	HUMAN SERVICES SPEC II	COMMUNITY PROGRAM SUPER	04	E	LOWER SAVANNAH PRE-RELEASE CENTER	3/17/06
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION	3/17/06
JD50	CORRECTIONAL OFFICER IV	CAPTAIN	06	C	LEE CORRECTIONAL INSTITUTION	3/17/06
AA50	ADMIN SPECIALIST II	ADMINISTRATIVE SPECIALIST	03	A	MEDICAL SUPPORT	4/2/06
AD22	ACCTNT/FISCAL ANALYST II	SENIOR ACCOUNTANT	05	D	FINANCIAL ACCOUNTING	4/2/06
AD22	ACCTNT/FISCAL ANALYST II	SENIOR ACCOUNTANT	05	D	FINANCIAL ACCOUNTING	4/2/06
AH35	PROGRAM COORDINATOR I	VOCATIONAL INSTRUCTOR	05	B	LEATH CORR INSTIT (WOMEN)	4/2/06
JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	MANNING CORRECTIONAL INSTITUTION	4/2/06
JD50	CORRECTIONAL OFFICER IV	MAJOR	06	E	TURBEVILLE CORRECTIONAL INSTITUTION	4/2/06
JD50	CORRECTIONAL OFFICER IV	CAPTAIN	06	C	INMATE BUS TERMINAL	4/2/06
KC50	TRADES SPECIALIST V	TRADES SPECIALIST V	05	E	CIV LABOR POOL 9511	4/2/06
UB26	PSYCHIATRIST	PSYCHIATRIST	00		MENTAL HEALTH	4/2/06
AA75	ADMINISTRATIVE ASSISTANT	ADMINISTRATIVE ASSISTANT	04	A	LEE CORRECTIONAL INSTITUTION	4/17/06
AJ18	DATA COORDINATOR II	DATA COORD II	04	D	FACILITIES MANAGEMENT	5/2/06
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MACDOUGALL CORRECTIONAL INST	5/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LEE CORRECTIONAL INSTITUTION	5/2/06
KC50	TRADES SPECIALIST V	TRADES SUPV I	05	B	EVANS CORRECTIONAL INSTITUTION	5/2/06
AH10	ADMINISTRATIVE COORD I	ADMIN COORDINATOR I	05	A	PALMETTO UNIFIED SCHOOL DISTRICT #1	5/17/06
EA80	NURSE ADMINISTRATOR/MGR II	NURSE ADMIN/MGR	07	D	EVANS CORRECTIONAL INSTITUTION	5/17/06
GA50	HUMAN SERVICES COORD I	CCC IV	05	D	MENTAL HEALTH	5/17/06

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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NEW			A	V		
JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION	5/17/06
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION	5/17/06
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION	5/17/06
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION	5/17/06
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION	5/17/06
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION	5/17/06
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION	5/17/06
KA30	BUILDING/GROUNDS MGR	BUILDING/GRNDS MANAGER	06	A	FACILITIES MANAGEMENT	5/17/06
HD65	ENG/ASSOC ENG II	ENG/ASSOC ENG II	06	B	FACILITIES MANAGEMENT	6/2/06
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION	6/2/06
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION	6/2/06
JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

NEW JOB CLAS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION	EFF DATE
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MACDOUGALL CORRECTIONAL INST	6/2/06

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06

RESPONSE TO QUESTION 3B POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

NEW JOB CLAS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION	EFF DATE
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDOUGALL CORRECTIONAL INST	6/2/06

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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NEW			A	V		
JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MACDQUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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NEW			A	V		
JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MACDOUGALL CORRECTIONAL INST	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TRENTON CORRECTIONAL INSTITUTION	6/2/06
JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	MACDOUGALL CORRECTIONAL INST	6/2/06
JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	MACDOUGALL CORRECTIONAL INST	6/2/06
JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	MACDOUGALL CORRECTIONAL INST	6/2/06
UB26	PSYCHIATRIST	PSYCHIATRIST	00		MENTAL HEALTH	6/2/06
HD65	ENG/ASSOC ENG II	ENGINEERING ASSOC II	06	B	FACILITIES MANAGEMENT	6/17/06
HD65	ENG/ASSOC ENG II	ENGINEERING ASSOC II	06	B	FACILITIES MANAGEMENT	6/17/06
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	RIDGELAND CORR INSTITUTION	6/17/06
AG10	HUMAN RESOURCE MANAGER I	HUMAN RESOURCE MANAGER	05	D	ALLENDALE CORRECTIONAL INSTITUTION	7/2/06
AG10	HUMAN RESOURCE MANAGER I	HUMAN RESOURCE MANAGER	05	D	KERSHAW CORRECTIONAL INSTITUTION	7/2/06

RESPONSE TO QUESTION 3B-POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
AH30	PROGRAM ASSISTANT	TRACTOR TRAILER DRIVER	04	E	CANTEEN WHSE INVENTORY/DISTRIBUTION	7/2/06
EA60	NURSE PRACTITIONER III	NURSE PRACTITIONER	07	E	MENTAL HEALTH	7/2/06
EA80	NURSE ADMINISTRATOR/MGR II	HEALTH CARE AUTHORITY	07	D	BROAD RIVER CORRECTIONAL INSTITUTION	7/2/06
GA50	HUMAN SERVICES COORD I	HUMAN SERVICES COORD	05	E	MENTAL HEALTH	7/2/06
JD30	CORRECTIONAL OFFICER I	CADET	03	C	KIRKLAND CORRECTIONAL INSTITUTION	7/17/06
UB26	PSYCHIATRIST	PSYCHIATRIST	00		MENTAL HEALTH	7/17/06
AA50	ADMIN SPECIALIST II	ADMIN SPEC C	03	C	ALLENDALE CORRECTIONAL INSTITUTION	8/2/06
AC20	PROCUREMENT SPECIALIST II	PROCUREMENT SPECIALIST II	05	C	PURCHASING	8/2/06
AH10	ADMINISTRATIVE COORD I	ADMIN COORDINATOR	05	E	OFFICE OF MEDICAL & HEALTH SERVICES	8/2/06
AH20	ADMINISTRATIVE MGR I	ADMINISTRATOR SMU	07	A	LEE CORRECTIONAL INSTITUTION	8/2/06
AH30	PROGRAM ASSISTANT	CLASSIFICATION CASEWORKE	04	C	KIRKLAND CORRECTIONAL INSTITUTION	8/2/06
AH35	PROGRAM COORDINATOR I	PROGRAM COORDINATOR	05	A	DIV OF CLASSIFICATION & INMATE RECORD	8/2/06
BC40	PUBLIC INFO DIRECTOR II	PUBLIC INFORMATION DIR II	07	B	AGENCY DIRECTOR	8/2/06
BH40	RECORDS ANALYST III	RECORDS ANALYST	05	B	DIV OF CLASSIFICATION & INMATE RECORD	8/2/06
GA50	HUMAN SERVICES COORD I	HUMAN SERVICES COORD	05	D	MENTAL HEALTH	8/2/06
KC50	TRADES SPECIALIST V	TRADES SPECIALIST V	05	C	CAMILLE GRAHAM CORRECTIONAL INST	8/2/06
LA97	FARM FOREMAN II	FARM FOREMAN II	04	B	WATEREE FARM OPERATIONS	8/2/06
AB30	POSTAL CENTER DIR II	POSTAL DIRECTOR II	04	A	TYGER RIVER CORRECTIONAL INSTITUTION	8/17/06
AH10	ADMINISTRATIVE COORD I	ADMINISTRATIVE COORD	05	E	PERRY CORRECTIONAL INSTITUTION	8/17/06
EA80	NURSE ADMINISTRATOR/MGR II	HEALTH CARE AUTHORITY	07	B	MANNING CORRECTIONAL INSTITUTION	8/17/06
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	GOODMAN CORRECTIONAL INSTITUTION	8/17/06
JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT II	05	C	TRAINING	8/17/06
JD55	WARDEN I	ASSOC WARDEN III	07	B	KERSHAW CORRECTIONAL INSTITUTION	8/17/06
KC50	TRADES SPECIALIST V	TRADES SPEC V	05	E	FACILITIES MANAGEMENT	8/17/06
AA50	ADMIN SPECIALIST II	ADMIN SPEC C	03	C	MCCORMICK CORRECTIONAL INSTITUTION	9/2/06
AA50	ADMIN SPECIALIST II	ADMINISTRATIVE SPEC C	03	C	LOWER SAVANNAH PRE-RELEASE CENTER	9/2/06
JD55	WARDEN I	ASSOC WARDEN III	07	B	MCCORMICK CORRECTIONAL INSTITUTION	9/2/06
JD55	WARDEN I	ASSOCIATE WARDEN III	07	B	BROAD RIVER CORRECTIONAL INSTITUTION	9/2/06

RESPONSE TO QUESTION 3B POSITIONS RECLASSIFIED WITH AN EFFECTIVE DATE OF 7/2/03 TO PRESENT

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JOB	STATE	INTERNAL	N	E		EFF
CLAS	TITLE	TITLE	D	L	LOCATION	DATE
EC10	MEDICAL ASSISTANT TECH I	CNA	02	C	TRENTON CORRECTIONAL INSTITUTION	6/17/20
GC30	CHAPLAIN III	BRANCH CHIEF	06	C	MACDOUGALL CORRECTIONAL INST	8/2/20
JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TYGER RIVER CORRECTIONAL INSTITUTION	8/17/20
JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION	9/17/20

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
1/2/02	JONES MIRIAM S	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MCCORMICK CORRECTIONAL INSTITUTION
1/2/02	JENNINGS CHASITY R	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
1/2/02	BANKS ROBERT L	KA30	BUILDING/GROUNDS MGR	BUILDING/GROUNDS MGR	06	A	FACILITIES MANAGEMENT
1/2/02	DAVIS RAMON R	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
1/2/02	SINGLETON SHIRLEY	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	ALLENDALE CORRECTIONAL INSTITUTION
1/2/02	STEPHENS SIMMONS BARBARA A	JD40	CORRECTIONAL OFFICER III	LIEUTENANT I	05	B	CAMILLE GRAHAM CORRECTIONAL INST
1/2/02	STEPHENS SIMMONS BARBARA A	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	CAMILLE GRAHAM CORRECTIONAL INST
1/2/02	GARRISON DIANA L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE CORRECTIONAL INSTITUTION
1/2/02	BRADLEY JUDY K	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST I	04	E	WALDEN CORRECTIONAL INSTITUTION
1/2/02	BELL VICKIE L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE CORRECTIONAL INSTITUTION
1/2/02	HOLLOWAY LONNIE	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE CORRECTIONAL INSTITUTION
1/2/02	COMBS CLARENCE W	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	EVANS CORRECTIONAL INSTITUTION
1/2/02	NESBITT STANLEY O	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON CORRECTIONAL INSTITUTION
1/2/02	SPRAGUE GEORGE A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE CORRECTIONAL INSTITUTION
1/2/02	HARMON COLEY G	KB30	FOOD SERVICE SPECIALIST VI	FOOD SVC SPEC VI	06	A	KERSHAW CORRECTIONAL INSTITUTION
1/2/02	WINSTON VICTORIA D	JD40	CORRECTIONAL OFFICER III	LIEUTENANT I	05	B	KIRKLAND CORRECTIONAL INSTITUTION
1/2/02	WINSTON VICTORIA D	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	KIRKLAND CORRECTIONAL INSTITUTION
1/2/02	SMITH BRANDI L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	ALLENDALE CORRECTIONAL INSTITUTION
1/2/02	THOMAS VERONICA	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	CATAWBA PRE RELEASE CENTER
1/17/02	BEDDINGFIELD DAVID P	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
1/17/02	DOWNING MARIAN Y	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	GOODMAN CORRECTIONAL INSTITUTION
1/17/02	BAXLEY IRA	JD50	CORRECTIONAL OFFICER IV	MAJOR	06	E	SECURITY
1/17/02	GODDARD KEVIN P	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	PERRY CORRECTIONAL INSTITUTION
1/17/02	THOMPSON GLENDA A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	PERRY CORRECTIONAL INSTITUTION
1/17/02	MOORE VALERIE D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
1/17/02	REDFEARN ETHEL E	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	KERSHAW CORRECTIONAL INSTITUTION
1/17/02	HILL JONATHAN S	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
1/17/02	ELSENPETER BARRON D	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	LEE CORRECTIONAL INSTITUTION
1/17/02	MOORER GWENDOLYN D	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION
1/17/02	SIMS JR DAVID	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	PERRY CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04 SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
1/17/02	BUOY WANDA W	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	RIDGELAND CORR INSTITUTION
1/17/02	THOMAS CHARLES L	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	STEVENSON CORRECTIONAL INSTITUTION
1/17/02	JENKINS BRIAN E	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	ALLENDALE CORRECTIONAL INSTITUTION
1/17/02	CARTLEDGE LARRY	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	MENTAL HEALTH
2/2/02	DUNMEYER LILY M	EA10	LICENSED PRACTICAL NURSE	LPN	03	C	MACDOUGALL CORRECTIONAL INST
2/2/02	DINGLE GEORGE L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
2/2/02	GILLIAM ASHLEE D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	PERRY CORRECTIONAL INSTITUTION
2/2/02	BARKLEY JOHN G	AH35	PROGRAM COORDINATOR I	PUBLIC INFORMATION DIR	05	E	MANNING CORRECTIONAL INSTITUTION
2/2/02	BARKLEY JOHN G	BC30	PUBLIC INFO DIRECTOR I	PUBLIC INFORMATION DIR	06	D	MANNING CORRECTIONAL INSTITUTION
2/2/02	WILSON HERBERT	KA20	BUILDING/GROUNDS SUPV I	BUILDING/GROUNDS SUPV I	04	A	INMATE SERVICES
2/2/02	COKER JR LACEY D	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT I	05	B	TURBEVILLE CORRECTIONAL INSTITUTION
2/2/02	BROWN AARON A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	RIDGELAND CORR INSTITUTION
2/2/02	CLARK DIANE M	AA50	ADMIN SPECIALIST II	ADMIN SPEC B	03	A	BROAD RIVER CORRECTIONAL INSTITUTION
2/2/02	CARTER ANN M	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION
2/2/02	SCOTT BRENDA L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
2/2/02	VAN BORSCH DONALD	AH35	PROGRAM COORDINATOR I	BUILDING/GROUNDS SUPV II	05	B	WALDEN FARM OPER
2/2/02	VAN BORSCH DONALD	KA25	BUILDING/GROUNDS SUPV II	BUILDING/GROUNDS SUPV II	05	B	WALDEN FARM OPER
2/2/02	JOHNSON ANNA K	AH40	PROGRAM COORDINATOR II	BRANCH CHIEF	06	B	INMATE SERVICES
2/2/02	YATES CHARLES M	AH15	ADMINISTRATIVE COORD II	ADMIN COORD II	06	D	BROAD RIVER CORRECTIONAL INSTITUTION
2/2/02	STEPHAN MICHAEL S	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	BROAD RIVER CORRECTIONAL INSTITUTION
2/2/02	SMALLS NICOLE A	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND CORR INSTITUTION
2/2/02	MCKNIGHT LAKASHIA N	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	CAMPBELL PRE RELEASE CENTER
2/2/02	BROWDER JASON G	KA25	BUILDING/GROUNDS SUPV II	BUILDING/GROUNDS SUPV II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION
2/2/02	DURHAM ELIZABETH	KA25	BUILDING/GROUNDS SUPV II	SUPV OF GRNDS & SPEC SVCS	05	D	INMATE SERVICES
2/2/02	SMITH BOBBY L	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	STEVENSON CORRECTIONAL INSTITUTION
2/2/02	MILLER SR JAMES A	KA20	BUILDING/GROUNDS SUPV I	SUPT OF GROUNDS	04	D	INMATE SERVICES
2/2/02	THOMPSON LAWRENCE M	AH30	PROGRAM ASSISTANT	INDUSTRIES SUPV II	04	D	INDUSTRIES ADMINISTRATION NN
2/2/02	LEE BEVERLY A	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	STEVENSON CORRECTIONAL INSTITUTION
2/17/02	SCOTT CAROL A	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	MANNING CORRECTIONAL INSTITUTION
2/17/02	AIKINS GARY	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	MANNING CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04 SORTED BY EFF DATE

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EFF	EMPLOYEE	JOB	STATE	INTERNAL	N	E	
DATE	NAME	CLASS	TITLE	TITLE	D	L	LOCATION
2/17/02	BEDDINGFIELD DAVID P	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	PERRY CORRECTIONAL INSTITUTION
2/17/02	MERRITTS DAVID R	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	LIEBER CORRECTIONAL INSTITUTION
2/17/02	GUESS EADY WONETTA L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	ALLENDALE CORRECTIONAL INSTITUTION
2/17/02	SIMON VEVERLYN D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
2/17/02	SMITH TIMOTHY A	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	MANNING CORRECTIONAL INSTITUTION
2/17/02	SANDERS MICHAEL D	JD40	CORRECTIONAL OFFICER III	LIEUTENANT I	05	B	KERSHAW CORRECTIONAL INSTITUTION
2/17/02	SANDERS MICHAEL D	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	KERSHAW CORRECTIONAL INSTITUTION
2/17/02	PEARSON LEVIE	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	RIDGELAND CORR INSTITUTION
2/17/02	WILSON HAROLD	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	CAMILLE GRAHAM CORRECTIONAL INST
2/17/02	HOLMES KEITH M	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	GOODMAN CORRECTIONAL INSTITUTION
2/17/02	ROBINSON GLENNIE	KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	KERSHAW CORRECTIONAL INSTITUTION
2/17/02	HARTZLER M L	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT II	05	C	CAMPBELL PRE RELEASE CENTER
2/17/02	WOLFE SR RICHARD A	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	STEVENSON CORRECTIONAL INSTITUTION
2/17/02	HUTCHINSON DONALD L	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	MANNING CORRECTIONAL INSTITUTION
2/17/02	HARPER SR TOM J	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	STEVENSON CORRECTIONAL INSTITUTION
2/17/02	CUMMINGS SYLVESTER J	JD40	CORRECTIONAL OFFICER III	LIEUTENANT I	05	B	KERSHAW CORRECTIONAL INSTITUTION
2/17/02	CUMMINGS SYLVESTER J	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	KERSHAW CORRECTIONAL INSTITUTION
2/17/02	MEREE TRINADY L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
2/17/02	STACK CORINTHEA	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT II	05	C	WATKINS PRE RELEASE CENTER
2/17/02	HOLLAND KYLE C	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
2/17/02	COLLIER HALLARD K	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT II	05	C	MANNING CORRECTIONAL INSTITUTION
2/17/02	KEARSE SAMUEL	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	ALLENDALE CORRECTIONAL INSTITUTION
2/17/02	JONES DEBRA M	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	CAMILLE GRAHAM CORRECTIONAL INST
2/17/02	JEFFERSON ROSLYN R	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER CORRECTIONAL INSTITUTION
2/17/02	CHANG RODNEY L	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT I	05	C	MACDOUGALL CORRECTIONAL INST
2/17/02	HUPKA EDWARD K	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TURBEVILLE CORRECTIONAL INSTITUTION
2/17/02	HITCHENS JR GEORGE R	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT II	05	E	WATKINS PRE RELEASE CENTER
2/17/02	HUMES TERRANCE L	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	EVANS CORRECTIONAL INSTITUTION
2/17/02	SHABAZZ SANDRA T	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MANNING CORRECTIONAL INSTITUTION
2/17/02	WILLIAMSON BRANDI C	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	RIDGELAND CORR INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04 SORTED BY EFF DATE

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EFF	EMPLOYEE	JOB	STATE	INTERNAL	N	E	
DATE	NAME	CLASS	TITLE	TITLE	D	L	LOCATION
2/17/02	EVANS KIPPY L	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	CAMPBELL PRE RELEASE CENTER
2/17/02	PATTISON EARL J	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	ALLENDALE CORRECTIONAL INSTITUTION
2/17/02	KOLB MARTIN G	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	LEE CORRECTIONAL INSTITUTION
2/17/02	BROWN JEROME C	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT II	05	E	GOODMAN CORRECTIONAL INSTITUTION
2/17/02	SHADLOW JONNATHAN C	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT II	05	C	BROAD RIVER CORRECTIONAL INSTITUTION
2/17/02	COCHRAN JR LARRY O	JD30	CORRECTIONAL OFFICER I	CADET	03	C	KIRKLAND CORRECTIONAL INSTITUTION
2/17/02	SHEPPARD ANN D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LIEBER CORRECTIONAL INSTITUTION
2/17/02	HURLBURT MARIA H	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MCCORMICK CORRECTIONAL INSTITUTION
2/17/02	JONES KENNETH R	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT II	05	C	KIRKLAND CORRECTIONAL INSTITUTION
2/17/02	ALFORD GREGORY W	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT II	05	C	EVANS CORRECTIONAL INSTITUTION
2/17/02	BOSTICK SUSAN V	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT I	05	B	CAMILLE GRAHAM CORRECTIONAL INST
2/17/02	NORRIS JR J C	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	CAMILLE GRAHAM CORRECTIONAL INST
2/17/02	LUCAS RICHARD L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
2/17/02	MANGUAL RAMON O	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT II	05	C	STEVENSON CORRECTIONAL INSTITUTION
2/17/02	ALSTON GAYLE J	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	MANNING CORRECTIONAL INSTITUTION
2/17/02	SLOOP LINDA D	AG05	HUMAN RESOURCE SPECIALIST	HUMAN RESOURCE SPEC II	04	E	HUMAN RESOURCES ADMINISTRATION
2/17/02	GILCHRIST RICHARD	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MCCORMICK CORRECTIONAL INSTITUTION
2/17/02	BALL CASSANDRA A	KB30	FOOD SERVICE SPECIALIST VI	FOOD SVC SPEC VI	06	A	EVANS CORRECTIONAL INSTITUTION
2/17/02	MITCHELL RICKIE D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LIEBER CORRECTIONAL INSTITUTION
2/17/02	ROBINS JOHN H	AH35	PROGRAM COORDINATOR I	PRGM COORD	05	C	MACDOUGALL CORRECTIONAL INST
2/17/02	SOLONE GEORGE A	JD40	CORRECTIONAL OFFICER III	LIEUTEUANT I	05	B	KIRKLAND CORRECTIONAL INSTITUTION
2/17/02	SOLONE GEORGE A	JD35	CORRECTIONAL OFFICER II	LIEUTEUANT I	04	E	KIRKLAND CORRECTIONAL INSTITUTION
2/17/02	ARCHIE VIVIAN	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	STEVENSON CORRECTIONAL INSTITUTION
2/17/02	BOOKMAN FERMAICKO D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	CAMILLE GRAHAM CORRECTIONAL INST
2/17/02	TURNER RICHARD L	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT II	05	C	LEATH CORR INSTIT (WOMEN)
2/17/02	GOMORI GLORIA A	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT II	05	C	GOODMAN CORRECTIONAL INSTITUTION
2/17/02	WILLIAMS ELBERT M	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	WATKINS PRE RELEASE CENTER
3/2/02	STONE GLENN	JD50	CORRECTIONAL OFFICER IV	MAJOR	06	E	CAMPBELL PRE RELEASE CENTER
3/2/02	RUTLAND MARGARET M	JD30	CORRECTIONAL OFFICER I	ADMIN SPEC C	03	E	TRENTON CORRECTIONAL INSTITUTION
3/2/02	MITCHELL TRACY T	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
3/2/02	SULLIVAN JUDY E	JD35	CORRECTIONAL OFFICER II	CANTEEN MGR II	04	B	KERSHAW CORRECTIONAL INSTITUTION
3/2/02	MICKEL EARNESTINE G	JD30	CORRECTIONAL OFFICER I	POSTAL DIR I	03	E	NORTHSIDE CORRECTIONAL INSTITUTION
3/2/02	REYNOLDS CECILIA R	JD55	WARDEN I	ASSOC WARDEN III	07	B	TURBEVILLE CORRECTIONAL INSTITUTION
3/2/02	ROBINSON SHIRLEY K	JD30	CORRECTIONAL OFFICER I	ADMIN SPEC B	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
3/2/02	JENKINS GEORGE C	JD35	CORRECTIONAL OFFICER II	COMPUTER OPERATOR II	04	B	ALLENDALE CORRECTIONAL INSTITUTION
3/2/02	JENKINS GEORGE C	JD35	CORRECTIONAL OFFICER II	COMPUTER OPERATOR II	04	B	SYSTEMS OPERATION AND SUPPORT
3/2/02	FERNANDEZ WANDA W	JD30	CORRECTIONAL OFFICER I	ADMIN SPEC B	03	E	KIRKLAND CORRECTIONAL INSTITUTION
3/2/02	MCKENZIE JOSEPH	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	STEVENSON CORRECTIONAL INSTITUTION
3/2/02	BARR THOMAS A	JD40	CORRECTIONAL OFFICER III	SUPPLY SUPV	05	B	KIRKLAND CORRECTIONAL INSTITUTION
3/2/02	BARR THOMAS A	JD40	CORRECTIONAL OFFICER III	SUPPLY SUPV	05	B	COMMISSARY WHSE INVENTORY/DISTRIBUTION
3/2/02	LEGGINS MARIA D	JD30	CORRECTIONAL OFFICER I	ADMIN SPEC C	03	E	CAMILLE GRAHAM CORRECTIONAL INST
3/2/02	LEGGINS MARIA D	JD30	CORRECTIONAL OFFICER I	ADMIN SPEC C	03	E	TRAINING
3/2/02	FOSTER RICHARD E	JD40	CORRECTIONAL OFFICER III	GRIEVANCE ADMINISTRATOR	05	A	RECRUITING & EMPLOYMENT SERVICES
3/2/02	FOSTER RICHARD E	JD40	CORRECTIONAL OFFICER III	GRIEVANCE ADMINISTRATOR	05	A	INMATE GRIEVANCE
3/2/02	SHORTS RANDY L	JD35	CORRECTIONAL OFFICER II	CANTEEN MGR	04	B	LIVESAY PRE RELEASE CENTER
3/2/02	LOTT CHRISTOPHE D	JD35	CORRECTIONAL OFFICER II	FARM MGR I	04	B	MACDOUGALL CORRECTIONAL INST
3/2/02	LOTT CHRISTOPHE D	JD35	CORRECTIONAL OFFICER II	FARM MGR I	04	B	MAC DOUGALL FARM OPER
3/2/02	MARTIN ROGER L	JD40	CORRECTIONAL OFFICER III	INVESTIGATOR III	05	B	INVESTIGATIONS
3/2/02	POWELL TOMMIE T	JD35	CORRECTIONAL OFFICER II	INDUSTRIES SUPV I	04	A	WALDEN CORRECTIONAL INSTITUTION
3/2/02	POWELL TOMMIE T	JD35	CORRECTIONAL OFFICER II	INDUSTRIES SUPV I	04	A	INDUSTRIES ADMINISTRATION NN
3/2/02	CHRISTMAS ERNEST A	JD35	CORRECTIONAL OFFICER II	BUILDING/GROUNDS SUPV I	04	B	LEE CORRECTIONAL INSTITUTION
3/2/02	LOADHOLT GERTRUDE O	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE CORRECTIONAL INSTITUTION
3/2/02	BLACKMON GAIL L	JD30	CORRECTIONAL OFFICER I	ADMIN SPEC C	03	E	GOODMAN CORRECTIONAL INSTITUTION
3/2/02	BLACKMON GAIL L	JD30	CORRECTIONAL OFFICER I	ADMIN SPEC C	03	E	TRAINING
3/2/02	WEBB ALVERN M	JD35	CORRECTIONAL OFFICER II	PROP & INV CONTROL MGR	04	A	MANNING CORRECTIONAL INSTITUTION
3/2/02	WEBB ALVERN M	JD35	CORRECTIONAL OFFICER II	PROP & INV CONTROL MGR	04	A	CANTEEN WHSE INVENTORY/DISTRIBUTION
3/2/02	STALEY CARISA G	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	GOODMAN CORRECTIONAL INSTITUTION
3/2/02	KIMMONS DAMEKA T	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
3/2/02	ROBINSON CHRISTOPHE E	JD35	CORRECTIONAL OFFICER II	ASST SUPV BLDG & GROUNDS	04	B	KERSHAW CORRECTIONAL INSTITUTION
3/2/02	MOORE REBECCA F	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	EVANS CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
3/2/02	JONES FRED D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE CORRECTIONAL INSTITUTION
3/2/02	PIPITONE JAMES C	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	NORTHSIDE CORRECTIONAL INSTITUTION
3/2/02	JORDAN JR WILLIAM C	JD50	CORRECTIONAL OFFICER IV	MAJOR	06	E	WATEREE RIVER CORRECTIONAL INSTITUTION
3/2/02	STONE BRITTON F	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	BROAD RIVER CORRECTIONAL INSTITUTION
3/2/02	RAMSEY TERESA R	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE CORRECTIONAL INSTITUTION
3/2/02	NIX TERESIA S	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
3/2/02	MERVIN DAJARVIS L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	RIDGELAND CORR INSTITUTION
3/2/02	FOWLER MICHAEL E	JD35	CORRECTIONAL OFFICER II	INMATE GRIEVANCE COORD	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
3/17/02	RICHARD TIMOTHY	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TRENTON CORRECTIONAL INSTITUTION
3/17/02	JAMES HENRY A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
3/17/02	THOMPSON VICTORIA E	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
3/17/02	DAVENPORT JAMES S	AJ18	DATA COORDINATOR II	DATA COORD III	04	D	VEHICLE MAINTENANCE
3/17/02	MARTIN ROGER L	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	KIRKLAND CORRECTIONAL INSTITUTION
3/17/02	PATTERSON ROBERT L	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	CATAWBA PRE RELEASE CENTER
3/17/02	BYNUM ARMITRA V	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE CORRECTIONAL INSTITUTION
3/17/02	BRIGHT ROBERT M	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	CAMILLE GRAHAM CORRECTIONAL INST
3/17/02	SINGLETON JAMES T	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
3/17/02	DOBBS DENNIS W	JD40	CORRECTIONAL OFFICER III	LIEUTENANT I	05	B	RECRUITING & EMPLOYMENT SERVICES
3/17/02	FORESTER LEWIS	KB30	FOOD SERVICE SPECIALIST VI	FOOD SVC SPEC VI	06	A	LIEBER CORRECTIONAL INSTITUTION
4/2/02	MATHIS JR LAVERN G	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
4/2/02	HEYWARD BENJAMIN F	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	KERSHAW CORRECTIONAL INSTITUTION
4/2/02	REED BRENDA C	BC30	PUBLIC INFO DIRECTOR I	PUBLIC INFORMATION DIR	06	D	TRAINING
4/2/02	BRUNSON SHARON F	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TURBEVILLE CORRECTIONAL INSTITUTION
4/2/02	MCELVEEN BERNICE	EC10	MEDICAL ASSISTANT TECH I	CNA	02	C	TURBEVILLE CORRECTIONAL INSTITUTION
4/2/02	BARR THOMAS A	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	GOODMAN CORRECTIONAL INSTITUTION
4/2/02	MCCURRY KEITH R	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MCCORMICK CORRECTIONAL INSTITUTION
4/2/02	WOODWARD STEVEN P	AH50	PROGRAM MANAGER II	ASSOC DIR	08	D	DIVISION OF PROGRAMS & SERVICES
4/2/02	BUFFINGTON FLOREE	AH30	PROGRAM ASSISTANT	LIEUTENANT II	04	C	MCCORMICK CORRECTIONAL INSTITUTION
4/2/02	BOOKER FREDERICUS L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
4/2/02	WOODHAM ELIZABETH C	EA30	REGISTERED NURSE II	HEAD NURSE	06	A	LEE CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

					B	E	
					A	V	
EFF	EMPLOYEE	JOB	STATE	INTERNAL	N	E	
DATE	NAME	CLASS	TITLE	TITLE	D	L	LOCATION
4/2/02	PIPITONE JAMES C	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	NORTHSIDE CORRECTIONAL INSTITUTION
4/2/02	POINSETTE GERALD W	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LIEBER CORRECTIONAL INSTITUTION
4/2/02	POINSETTE GERALD W	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	SECURITY POOL POSITIONS STATE FUNDED
4/2/02	SINGLETON GERALD	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	COASTAL PRE RELEASE CENTER
4/2/02	TOLAND CARELETHA	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
4/2/02	TIMMONS JAMES H	KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	EVANS CORRECTIONAL INSTITUTION
4/2/02	LAWSON PINKY C	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
4/17/02	ROSSER MELVIN T	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
4/17/02	MAXWELL DEBORAH K	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LEATH CORR INSTIT (WOMEN)
4/17/02	ROLLINGS GARRICK L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION
4/17/02	GALLOWAY BEN T	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION
4/17/02	SKIPPER JR EUGENE D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LIEBER CORRECTIONAL INSTITUTION
4/17/02	QUATTLEBAUM LATISHA S	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TRENTON CORRECTIONAL INSTITUTION
4/17/02	FULLER CAROLYN	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LEATH CORR INSTIT (WOMEN)
4/17/02	BENJAMIN ARTHUR TINA R	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	EVANS CORRECTIONAL INSTITUTION
4/17/02	KEARSE SAMUEL	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	ALLENDALE CORRECTIONAL INSTITUTION
4/17/02	FLEMING NANNETTE	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON CORRECTIONAL INSTITUTION
4/17/02	WILLIAMS TIFFINEY D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TRENTON CORRECTIONAL INSTITUTION
4/17/02	WILLIAMS KIMBERLY N	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
4/17/02	AMMONS MARK K	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
4/17/02	JENKINS VERA S	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	D	LIEBER CORRECTIONAL INSTITUTION
4/17/02	HICE ALTON D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEE CORRECTIONAL INSTITUTION
4/17/02	ELLIS ELENA A	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER CORRECTIONAL INSTITUTION
4/17/02	SCOTT FELICIA A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LEE CORRECTIONAL INSTITUTION
4/17/02	HOLLOWAY LONNIE	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEE CORRECTIONAL INSTITUTION
4/17/02	SIMPSON GLORIA D	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WATKINS PRE RELEASE CENTER
4/17/02	WOODHAM ELIZABETH C	EA80	NURSE ADMINISTRATOR/MGR II	HEALTH CARE AUTHORITY III	07	D	LEE CORRECTIONAL INSTITUTION
4/17/02	DAVIS KENNETH W	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
4/17/02	TERRY LEROY	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	ALLENDALE CORRECTIONAL INSTITUTION
4/17/02	DOBBS DENNIS W	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	BROAD RIVER CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
4/17/02	HARRISON TAMMY L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	RIDGELAND CORR INSTITUTION
5/2/02	WATSON SAMUEL	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	RIDGELAND CORR INSTITUTION
5/2/02	SAYLES RANDY S	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
5/2/02	REED BRENDA C	AH35	PROGRAM COORDINATOR I	PUBLIC INFORMATION DIR	05	D	TRAINING
5/2/02	LOWERY JOSEPH L	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	TRAINING
5/2/02	MCKENZIE JOSEPH	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	STEVENSON CORRECTIONAL INSTITUTION
5/2/02	RICE GEOFFREY	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	TRENTON CORRECTIONAL INSTITUTION
5/2/02	IRBY JR MARK A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	PERRY CORRECTIONAL INSTITUTION
5/2/02	MAYS REGINA T	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	RIDGELAND CORR INSTITUTION
5/2/02	DWYER ANN M	GA60	HUMAN SERVICES COORD II	COORD FEMALE SERVICES	06	D	MENTAL HEALTH
5/2/02	GIST POLLYLET	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
5/2/02	MURRAY DEBORAH A	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	NORTHSIDE CORRECTIONAL INSTITUTION
5/2/02	BROWN JEROME C	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	WATEREE RIVER CORRECTIONAL INSTITUTION
5/2/02	HOUTS KEITH E	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	CATAWBA PRE RELEASE CENTER
5/2/02	RAMSEY JR ALEX	AH30	PROGRAM ASSISTANT	TRACTOR TRAILER DRIVER	04	C	SUPPORT SERVICES ADMINISTRATION
5/2/02	COCHRAN JR LARRY O	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
5/2/02	HUDGENS ROSE M	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	LIVESAY PRE RELEASE CENTER
5/2/02	MARTIN ARTHENIA	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	LIVESAY PRE RELEASE CENTER
5/2/02	MCCULLOUGH LEVERN	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	LEE CORRECTIONAL INSTITUTION
5/2/02	SANDERS GLORIA H	EA10	LICENSED PRACTICAL NURSE	LPN	03	C	LIEBER CORRECTIONAL INSTITUTION
5/2/02	GEIGER CHARLES	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
5/2/02	STAGGS DESIREE Y	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	NORTHSIDE CORRECTIONAL INSTITUTION
5/2/02	PRIOLEAU TERRENCE R	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LEE CORRECTIONAL INSTITUTION
5/2/02	WIGGINS JR JOHN	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	RIDGELAND CORR INSTITUTION
5/17/02	THURMAN VINCENT C	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
5/17/02	PRICE JASON	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MACDOUGALL CORRECTIONAL INST
5/17/02	WELLS JEROME	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
5/17/02	JOYNER FRANKLIN R	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	GOODMAN CORRECTIONAL INSTITUTION
5/17/02	ARRINGTON PAMELA K	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
5/17/02	STEVENSON III ROBERT M	AH40	PROGRAM COORDINATOR II	ASSOC WARDEN	06	E	KIRKLAND CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BASE	LEVEL	LOCATION
5/17/02	KANE MICHAEL E	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	STEVENSON CORRECTIONAL INSTITUTION
5/17/02	FABEL JOSHUA D	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION
5/17/02	MYERS DEBRA L	KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	LIEBER CORRECTIONAL INSTITUTION
5/17/02	AIKENS VALORIE J	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MCCORMICK CORRECTIONAL INSTITUTION
5/17/02	KENNEDY STACEY D	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	CATAWBA PRE RELEASE CENTER
5/17/02	ROBINSON ELAINE C	AH40	PROGRAM COORDINATOR II	PRGM COORD II	06	E	STEVENSON CORRECTIONAL INSTITUTION
5/17/02	MCCALL JR DAVID M	AH40	PROGRAM COORDINATOR II	PRGM COORD II	06	C	KIRKLAND CORRECTIONAL INSTITUTION
5/17/02	RODRIGUEZ FREDDIE	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION
5/17/02	BURGESS PATRICIA M	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	STEVENSON CORRECTIONAL INSTITUTION
5/17/02	RODGERS CHADWICK L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TRENTON CORRECTIONAL INSTITUTION
5/17/02	RAMSEY STEVEN E	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
6/2/02	TENNIS NANCY J	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	COASTAL PRE RELEASE CENTER
6/2/02	GOODWIN LISA R	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	CAMILLE GRAHAM CORRECTIONAL INST
6/2/02	DOWDELL JR EDDIE W	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON CORRECTIONAL INSTITUTION
6/2/02	SMILEY SENSAN	AG05	HUMAN RESOURCE SPECIALIST	HUMAN RESOURCE SPEC I	04	B	HUMAN RESOURCES ADMINISTRATION
6/2/02	DIEHL BETTY A	AH10	ADMINISTRATIVE COORD I	LEAVE SECTION SUPV	05	D	HUMAN RESOURCES ADMINISTRATION
6/2/02	NELSON JUDITH A	AG05	HUMAN RESOURCE SPECIALIST	BENEFITS ADMINISTRATOR	04	B	HUMAN RESOURCES ADMINISTRATION
6/2/02	JOHNSON JUANITA O	AG05	HUMAN RESOURCE SPECIALIST	HUMAN RESOURCE SPEC I	04	B	HUMAN RESOURCES ADMINISTRATION
6/2/02	HARMON DARLENE S	AG05	HUMAN RESOURCE SPECIALIST	HUMAN RESOURCE SPEC II	04	E	HUMAN RESOURCES ADMINISTRATION
6/2/02	MURDOCK SARA L	EA30	REGISTERED NURSE II	HEAD NURSE	06	A	EVANS CORRECTIONAL INSTITUTION
6/2/02	GRACIEN ROBIN M	AG15	HUMAN RESOURCES MANAGER	BRANCH CHIEF	06	C	HUMAN RESOURCES ADMINISTRATION
6/2/02	CREWS KAREN E	AG15	HUMAN RESOURCES MANAGER	BRANCH CHIEF	06	C	HUMAN RESOURCES ADMINISTRATION
6/2/02	WOLFE CAROLYN F	AC07	SUPPLY MANAGER I	SUPPLY MGR	04	E	HUMAN RESOURCES ADMINISTRATION
6/2/02	WALKER YVONNE W	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK CORRECTIONAL INSTITUTION
6/2/02	YOUNG LISA H	AG05	HUMAN RESOURCE SPECIALIST	HUMAN RESOURCE SPEC II	04	E	HUMAN RESOURCES ADMINISTRATION
6/2/02	JONES ROSETTA	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK CORRECTIONAL INSTITUTION
6/2/02	GALVEZ JOSE L	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	COASTAL PRE RELEASE CENTER
6/2/02	MCMATH HARLAN G	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK CORRECTIONAL INSTITUTION
6/2/02	BRAMLETT LINDA R	AG10	HUMAN RESOURCE MANAGER I	BENEFITS SECTION SUPV	05	D	HUMAN RESOURCES ADMINISTRATION
6/2/02	BARNES BRIDGETTE L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04 SORTED BY EFF DATE

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					B	E	
					A	V	
EFF	EMPLOYEE	JOB	STATE	INTERNAL	N	E	
DATE	NAME	CLASS	TITLE	TITLE	D	L	LOCATION
6/2/02	BELL MAPLE MARSHELLA	AG05	HUMAN RESOURCE SPECIALIST	HUMAN RESOURCE SPEC I	04	B	HUMAN RESOURCES ADMINISTRATION
6/2/02	REID LINDA T	AG05	HUMAN RESOURCE SPECIALIST	BENEFITS ADMINISTRATOR	04	B	HUMAN RESOURCES ADMINISTRATION
6/2/02	PAYTON BRENDA	AG05	HUMAN RESOURCE SPECIALIST	HUMAN RESOURCE SPEC I	04	B	HUMAN RESOURCES ADMINISTRATION
6/2/02	BURTON PAMELA M	AA50	ADMIN SPECIALIST II	PERSONNEL ASST	03	D	HUMAN RESOURCES ADMINISTRATION
6/2/02	DIKE LAKETA V	AG10	HUMAN RESOURCE MANAGER I	ASST SUPV PAYROLL	05	D	HUMAN RESOURCES ADMINISTRATION
6/2/02	SPURLOCK SHERRY F	AA50	ADMIN SPECIALIST II	PERSONNEL ASST	03	D	HUMAN RESOURCES ADMINISTRATION
6/2/02	EDWARDS PAUL A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
6/2/02	GRINNELL WANDA D	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WALDEN CORRECTIONAL INSTITUTION
6/2/02	STRAKER KATHY G	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK CORRECTIONAL INSTITUTION
6/2/02	RHEA ROGERS SAUNDRA A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	INMATE BUS TERMINAL
6/2/02	BUFF SUSAN R	AH35	PROGRAM COORDINATOR I	WEBMASTER	05	C	DIV OF CLASSIFICATION & INMATE RECORD
6/2/02	SHEALY GLORIA E	AA50	ADMIN SPECIALIST II	ADMINISTRATIVE SPEC	03	D	RECRUITING & EMPLOYMENT SERVICES
6/2/02	BOLDEN LESSIE	AG15	HUMAN RESOURCES MANAGER	BRANCH CHIEF	06	C	HUMAN RESOURCES ADMINISTRATION
6/2/02	UNTHANK CORRIE A	AH10	ADMINISTRATIVE COORD I	ADMIN ASST III	05	C	HUMAN RESOURCES ADMINISTRATION
6/17/02	DELANY EILEEN	EA60	NURSE PRACTITIONER III	NURSE PRACTITIONER	07	E	MEDICAL SUPPORT
6/17/02	CORLEY TERRY L	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	ALLENDALE CORRECTIONAL INSTITUTION
6/17/02	CORLEY TERRY L	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	COASTAL PRE RELEASE CENTER
6/17/02	NATHANIEL DELORIS	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
6/17/02	GOODWIN CURTIS D	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION
6/17/02	HOLLIDAY CLYDE	GA50	HUMAN SERVICES COORD I	HUMAN SVCS COORD I	05	D	CAMILLE GRAHAM CORRECTIONAL INST
6/17/02	HOLMES SHANNON L	EA10	LICENSED PRACTICAL NURSE	LPN	03	C	CAMILLE GRAHAM CORRECTIONAL INST
6/17/02	BROWN TROY N	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	RIDGELAND CORR INSTITUTION
6/17/02	TOWNSEND MILBERT	KB30	FOOD SERVICE SPECIALIST VI	FOOD SVC SPEC VI	06	A	KERSHAW CORRECTIONAL INSTITUTION
6/17/02	PALMER EILEEN B	EA60	NURSE PRACTITIONER III	NURSE PRACTITIONER	07	E	LIEBER CORRECTIONAL INSTITUTION
6/17/02	JEFFERSON FRANKLIN	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
6/17/02	COSTA ANGELO J	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	MANNING CORRECTIONAL INSTITUTION
6/17/02	FITTS CHARLES B	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	RIDGELAND CORR INSTITUTION
6/17/02	SPIGNER CYNTHIA G	EA20	REGISTERED NURSE I	STAFF NURSE	05	A	CAMILLE GRAHAM CORRECTIONAL INST
6/17/02	MARTIN MARILYN A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TRENTON CORRECTIONAL INSTITUTION
6/17/02	SCOTT SHERRI D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BASE	LEVEL	LOCATION
6/17/02	MITCHELL CARL I	EB50	PHYSICIAN II	PHYSICIAN II	10	A	CAMILLE GRAHAM CORRECTIONAL INST
6/17/02	CROSBY JEFFREY B	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LIEBER CORRECTIONAL INSTITUTION
6/17/02	SINGLETARY GERALD L	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	MANNING CORRECTIONAL INSTITUTION
6/17/02	THOMAS SILVIA D	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	CATAWBA PRE RELEASE CENTER
6/17/02	HERRIOTT CHARLISA	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	CAMILLE GRAHAM CORRECTIONAL INST
6/17/02	MARTELL WILFREDO	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	COASTAL PRE RELEASE CENTER
6/17/02	BUFF SUSAN R	AH35	PROGRAM COORDINATOR I	WEBMASTER	05	C	OFFICE OF COMMUNICATIONS
7/2/02	HURT DAVID A	JC20	LE OFFICER K 9 AGENT	LAW ENF OFFICER II	05	A	INVESTIGATIONS
7/2/02	LAWRENCE WILLIE M	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	LOWER SAVANNAH PRE RELEASE CENTER
7/2/02	MILLER JON F	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	COASTAL PRE RELEASE CENTER
7/2/02	MEETZE JOHN M	JC30	LAW ENF OFFICER III	DIR K 9 DRUG INTERDICTION	06	C	INVESTIGATIONS
7/2/02	TRIPLETT JR EARNEST C	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
7/2/02	MAGWOOD BERNICE	AH10	ADMINISTRATIVE COORD I	CANTEEN MGR IV	05	C	RIDGELAND CORR INSTITUTION
7/2/02	THOMPSON WAYNE R	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	INVESTIGATIONS
7/2/02	DIMOND JOSEPH M	AH30	PROGRAM ASSISTANT	PRGM ASST	04	D	RIDGELAND CORR INSTITUTION
7/2/02	MORAN CHRISTOPHE E	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LIEBER CORRECTIONAL INSTITUTION
7/2/02	JENKINS VALJEAN E	EA20	REGISTERED NURSE I	STAFF NURSE	05	A	MANNING CORRECTIONAL INSTITUTION
7/2/02	PETERS NORMAN L	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION
7/2/02	MORGAN MICHAEL M	JC20	LE OFFICER K 9 AGENT	LAW ENFORCEMENT OFFICER II	05	A	INVESTIGATIONS
7/2/02	VON MUTIUS KARL L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
7/2/02	DAVIS LESLIE L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
7/2/02	JENNINGS MALINDA F	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MCCORMICK CORRECTIONAL INSTITUTION
7/2/02	BURNS DAVID L	JC20	LE OFFICER K 9 AGENT	LAW ENFORCEMENT OFFICER II	05	A	INVESTIGATIONS
7/2/02	TARPLEY WANDA D	AH50	PROGRAM MANAGER II	MGR INSTITUTIONAL SVCS	08	D	DIVISION OF PROGRAMS & SERVICES
7/2/02	VARNEY ROBERT J	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	INVESTIGATIONS
7/2/02	MOSKOWITZ MATTHEW J	JC20	LE OFFICER K 9 AGENT	LE OFFICER K 9 AGENT	05	A	INVESTIGATIONS
7/2/02	DRIGGERS CHARLES N	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
7/2/02	LITTLE MILLIE M	JC20	LE OFFICER K 9 AGENT	LAW ENF OFFICER K9 AGENT	05	A	INVESTIGATIONS
7/17/02	AIKINS GARY	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	STEVENSON CORRECTIONAL INSTITUTION
7/17/02	GOODWIN LISA R	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	CAMILLE GRAHAM CORRECTIONAL INST

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
7/17/02	GOODWIN LISA R	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	SECURITY POOL POSITIONS STATE FUNDED
7/17/02	ANDERSON MARY D	AE20	ATTORNEY II	ATTORNEY I	06	C	OFFICE OF GENERAL COUNSEL
7/17/02	BRIGGS HERMAN	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	CAMILLE GRAHAM CORRECTIONAL INST
7/17/02	JOHNSON JR EVANS H	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LOWER SAVANNAH PRE RELEASE CENTER
7/17/02	BAKER BEVERLY M	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST I	04	A	OFFICE OF GENERAL COUNSEL
7/17/02	MARKS JACQUELINE D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
7/17/02	ELLER III JAMES W	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
7/17/02	MCFADDEN GRACIE A	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	LEE CORRECTIONAL INSTITUTION
7/17/02	COWELL PHYLLIS C	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	KERSHAW CORRECTIONAL INSTITUTION
7/17/02	PHILLIPS BRIDGETTE D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	CAMILLE GRAHAM CORRECTIONAL INST
7/17/02	STOVER ORTELLIA F	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
7/17/02	NEAL PIERRE R	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
7/17/02	DRIFFIN LAMONT	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
7/17/02	MIRO GERALDINE P	AH50	PROGRAM MANAGER II	DIRECTOR PROG SERVICES	08	E	DIVISION II INSTITUTIONS
7/17/02	MOORE HOWARD N	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LEE CORRECTIONAL INSTITUTION
7/17/02	ELLIS MICHAEL A	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	RIDGELAND CORR INSTITUTION
7/17/02	WILLIAMS RICHIE DEA	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	ALLENDALE CORRECTIONAL INSTITUTION
7/17/02	ROOKARD CRYSTAL M	AE20	ATTORNEY II	ATTORNEY I	06	C	OFFICE OF GENERAL COUNSEL
7/17/02	BEST MARIE A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	RIDGELAND CORR INSTITUTION
7/17/02	SULTON SHERRY D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	EVANS CORRECTIONAL INSTITUTION
7/17/02	WEIR ANTOINETTE	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	CAMILLE GRAHAM CORRECTIONAL INST
7/17/02	FRANZ ROBERT A	AB20	POSTAL CENTER DIR I	POSTAL DIR I	03	C	WATEREE RIVER CORRECTIONAL INSTITUTION
8/2/02	LEWIS MAGGIE V	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	LOWER SAVANNAH PRE RELEASE CENTER
8/2/02	BYERLY SUSAN S	EA20	REGISTERED NURSE I	STAFF NURSE	05	A	MEDICAL SUPPORT
8/2/02	GARDNER TIFFANY A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	ALLENDALE CORRECTIONAL INSTITUTION
8/2/02	BROWN RANDALL	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	STEVENSON CORRECTIONAL INSTITUTION
8/2/02	DYCKES RICKY R	AC07	SUPPLY MANAGER I	SUPPLY MGR	04	A	COMMISSARY WHSE INVENTORY/DISTRIBUTION
8/2/02	ATKINSON BERND	KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION
8/2/02	LEE ROCKFORD A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
8/2/02	MILLER JANICE L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	PERRY CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
8/2/02	HENDERSON DEBRA A	EA10	LICENSED PRACTICAL NURSE	LPN	03	C	CAMILLE GRAHAM CORRECTIONAL INST
8/2/02	SPIGNER GLORIA J	EA10	LICENSED PRACTICAL NURSE	LPN	03	C	CAMILLE GRAHAM CORRECTIONAL INST
8/2/02	WILLIAMS LARRY C	EA10	LICENSED PRACTICAL NURSE	LPN	03	C	KIRKLAND CORRECTIONAL INSTITUTION
8/2/02	FREELAND KENNETH L	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	TRENTON CORRECTIONAL INSTITUTION
8/2/02	ALEXANDER TAMEEKA T	JD35	CORRECTIONAL OFFICER II	OFFICER II	04	D	KERSHAW CORRECTIONAL INSTITUTION
8/2/02	COOK ZUAN L	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	LOWER SAVANNAH PRE RELEASE CENTER
8/2/02	MCCOLLUM BRENDA L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
8/2/02	FRANKS JR RAYMOND E	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	GOODMAN CORRECTIONAL INSTITUTION
8/2/02	CALLIHAM LINDA A	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	TRENTON CORRECTIONAL INSTITUTION
8/2/02	BEGGS CHARLES M	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK CORRECTIONAL INSTITUTION
8/2/02	OUTEN RICHARD K	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
8/2/02	HAVELKA DOLORES J	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	CATAWBA PRE RELEASE CENTER
8/2/02	WOOTEN HAL D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MACDOUGALL CORRECTIONAL INST
8/2/02	GRANT GLORIA M	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	LEATH CORR INSTIT (WOMEN)
8/2/02	BROWN MARLON D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	EVANS CORRECTIONAL INSTITUTION
8/2/02	DOW KENDRA M	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION
8/2/02	DOW KENDRA M	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	SECURITY POOL POSITIONS STATE FUNDED
8/2/02	REMBERT ANCEL O	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
8/2/02	TURNER YOLANDA O	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	TRENTON CORRECTIONAL INSTITUTION
8/2/02	HARRISON RICKIE	AH25	ADMINISTRATIVE MGR II	WARDEN IV	08	B	DIV OF CLASSIFICATION & COMPLIANCE
8/2/02	HARRISON RICKIE	AH25	ADMINISTRATIVE MGR II	WARDEN IV	08	B	KERSHAW CORRECTIONAL INSTITUTION
8/2/02	ISGRIGG WILLIAM N	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	PERRY CORRECTIONAL INSTITUTION
8/17/02	GALLO STEPHEN A	AH30	PROGRAM ASSISTANT	INDUSTRIES SUPV II	04	D	LIEBER CORRECTIONAL INSTITUTION
8/17/02	NAJJAR MICHAEL T	AA50	ADMIN SPECIALIST II	LIEUTENANT II	03	A	PERRY CORRECTIONAL INSTITUTION
8/17/02	MERRITTS DAVID R	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LIEBER CORRECTIONAL INSTITUTION
8/17/02	JONES TERRY L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
8/17/02	ROBINSON GLENNIE	KB30	FOOD SERVICE SPECIALIST VI	FOOD SVC SPEC VI	06	A	LIEBER CORRECTIONAL INSTITUTION
8/17/02	MACK ALBERT L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LIEBER CORRECTIONAL INSTITUTION
8/17/02	MURRAY ROBERT	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	WATEREE RIVER CORRECTIONAL INSTITUTION
8/17/02	SULTON RONALD S	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
8/17/02	DALY JR BRIAN J	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	PERRY CORRECTIONAL INSTITUTION
8/17/02	JOHNSON SAMUEL L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LIEBER CORRECTIONAL INSTITUTION
8/17/02	REED RODNEY R	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	LOWER SAVANNAH PRE RELEASE CENTER
8/17/02	MCCONICO KIMBERLY R	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WALDEN CORRECTIONAL INSTITUTION
8/17/02	LYNES WILLIAM T	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LIEBER CORRECTIONAL INSTITUTION
8/17/02	BARKER MARLIA D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MCCORMICK CORRECTIONAL INSTITUTION
8/17/02	MOORE SHAMEEKA T	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
8/17/02	GOLDEN JR JAMES	KB30	FOOD SERVICE SPECIALIST VI	FOOD SVC SPEC VI	06	A	FOOD SERVICES ADMINISTRATION
8/17/02	WILLIAMS ELBERT M	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	CAMPBELL PRE RELEASE CENTER
9/2/02	COLLINS ALLEN L	KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	BROAD RIVER CORRECTIONAL INSTITUTION
9/2/02	DURANT LAURIE B	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
9/2/02	SWAN MARY L	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	LOWER SAVANNAH PRE RELEASE CENTER
9/2/02	RICKETSON BARBARA J	AB10	POSTAL SPECIALIST	POSTAL SUPV	02	E	LEE CORRECTIONAL INSTITUTION
9/2/02	WILLIAMS CAROL C	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		CAMILLE GRAHAM CORRECTIONAL INST
9/2/02	EMBLETON ERIC W	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LIEBER CORRECTIONAL INSTITUTION
9/2/02	PRINGLE ELIZABETH E	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	CAMILLE GRAHAM CORRECTIONAL INST
9/2/02	WILSON CHRISTIE Y	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	GOODMAN CORRECTIONAL INSTITUTION
9/2/02	GOODMAN DARREN L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
9/2/02	PRICE HAROLD D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
9/2/02	HAYGOOD CLAUDETTE	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LIEBER CORRECTIONAL INSTITUTION
9/2/02	AMMONS MARK K	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
9/2/02	HALLETT PAULA J	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
9/2/02	HODGES ELAINE N	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
9/2/02	RAMSEY TERESA R	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	ALLENDALE CORRECTIONAL INSTITUTION
9/2/02	WALL JR DAVID W	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
9/2/02	POWELL JR HOWARD C	KA30	BUILDING/GROUNDS MGR	BUILDING/GROUNDS MGR	06	A	CAMILLE GRAHAM CORRECTIONAL INST
9/2/02	COTTON MARCUS S	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	F	LEE CORRECTIONAL INSTITUTION
9/2/02	RICE SHAWANDA N	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	ALLENDALE CORRECTIONAL INSTITUTION
9/2/02	DOBBS DENNIS W	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	RECRUITING & EMPLOYMENT SERVICES
9/2/02	LAWRENCE BRAD S	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

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EFF	EMPLOYEE	JOB	STATE	INTERNAL	N	E	
DATE	NAME	CLASS	TITLE	TITLE	D	L	LOCATION
9/2/02	WILLIAMS CELESTE M	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	STEVENSON CORRECTIONAL INSTITUTION
9/2/02	SIMPSON MICHAEL	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	ALLENDALE CORRECTIONAL INSTITUTION
9/2/02	MERRITT II DAVID L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
9/3/02	SCURRY PATRICK L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
9/17/02	MYERS MARILYN	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST I	04	B	STEVENSON CORRECTIONAL INSTITUTION
9/17/02	BLANTON DAVID W	AH30	PROGRAM ASSISTANT	CASEWORKER I	04	C	KERSHAW CORRECTIONAL INSTITUTION
9/17/02	BRAMLETT JR WILLIAM T	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WALDEN CORRECTIONAL INSTITUTION
9/17/02	GLENN DIANA L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LIEBER CORRECTIONAL INSTITUTION
9/17/02	GASTON TINA M	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	TRENTON CORRECTIONAL INSTITUTION
9/17/02	SANDERS JR JAMES L	AH30	PROGRAM ASSISTANT	CASEWORKER I	04	C	KERSHAW CORRECTIONAL INSTITUTION
9/17/02	PRATT MABLE	EA80	NURSE ADMINISTRATOR/MGR II	HEALTH CARE AUTHORITY	07	D	MANNING CORRECTIONAL INSTITUTION
9/17/02	BETHEA SHIRLEY A	AG10	HUMAN RESOURCE MANAGER I	HUMAN RESOURCE MANAGER	05	C	MANNING CORRECTIONAL INSTITUTION
9/17/02	AUSTIN DEBRA D	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	LEATH CORR INSTIT (WOMEN)
9/17/02	ROSS SANDRA	EA80	NURSE ADMINISTRATOR/MGR II	HEALTH CARE AUTHORITY III	07	D	TRENTON CORRECTIONAL INSTITUTION
9/17/02	CHRISTMAS ERNEST A	KA25	BUILDING/GROUNDS SUPV II	BUILDING/GROUNDS SUPV II	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION
9/17/02	LOAN ERNESTINE	AH10	ADMINISTRATIVE COORD I	CANTEEN MGR IV	05	C	KIRKLAND CORRECTIONAL INSTITUTION
9/17/02	LEE ANDREW	KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	KERSHAW CORRECTIONAL INSTITUTION
9/17/02	CENEC NELSON	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
9/17/02	HURLBURT MARIA H	JD40	CORRECTIONAL OFFICER III	ADMIN LIEUTENANT I	05	B	TRENTON CORRECTIONAL INSTITUTION-A
9/17/02	HUDSON JEFFREY L	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	KERSHAW CORRECTIONAL INSTITUTION
9/17/02	MCCOY BRANDON K	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	EVANS CORRECTIONAL INSTITUTION
9/17/02	GILMAN NEIL R	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	STEVENSON CORRECTIONAL INSTITUTION
9/17/02	BLAIR CAROLYN I	JA80	INSPECTOR II	OPERATIONAL REVIEW MGR	04	E	PERRY CORRECTIONAL INSTITUTION
9/17/02	SHELTON JOHN L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
9/17/02	TAYLOR CATHLEEN	AH30	PROGRAM ASSISTANT	CASEWORKER I	04	C	KIRKLAND CORRECTIONAL INSTITUTION
10/2/02	GUINYARD EDWIN L	AH30	PROGRAM ASSISTANT	PROP & INV CONTROL MGR	04	E	FOOD SER WHSE INVENTORY/DISTRIBUTION
10/2/02	CAPERS MONIQUE M	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	RIDGELAND CORR INSTITUTION
10/2/02	LEWIS SHIRLEY E	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	RIDGELAND CORR INSTITUTION
10/2/02	WILLIAMS STEVEN A	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND CORR INSTITUTION
10/2/02	JONES VALERIE C	GA40	HUMAN SERVICES SPEC II	COUNSEL SUBSTITUTE	04	A	DIV OF CLASSIFICATION & INMATE RECORD

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
10/2/02	BRACEY TERRY W	JD50	CORRECTIONAL OFFICER IV	MAJOR	06	E	SECURITY
10/2/02	LESTER NANCY C	BH10	RECORDS ANALYST I	CASEWORKER I	03	E	KIRKLAND CORRECTIONAL INSTITUTION
10/2/02	GOODMAN MELISSA	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND CORR INSTITUTION
10/2/02	ROHL RICHARD C	KB30	FOOD SERVICE SPECIALIST VI	FOOD SVS SPEC VI	06	A	TURBEVILLE CORRECTIONAL INSTITUTION
10/2/02	WEEKS REAVER M	GA60	HUMAN SERVICES COORD II	HUMAN SVCS COORD II	06	A	STEVENSON CORRECTIONAL INSTITUTION
10/2/02	CHISHOLM WESLEY L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND CORR INSTITUTION
10/2/02	BRADSHAW JOHN C	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	PERRY CORRECTIONAL INSTITUTION
10/2/02	JENKINS PATRICIA A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MCCORMICK CORRECTIONAL INSTITUTION
10/2/02	AYALA JR MARIO	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND CORR INSTITUTION
10/2/02	IGLESIAS JOSE A	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	LEATH CORR INSTIT (WOMEN)
10/2/02	HAMPTON VERNON	EA20	REGISTERED NURSE I	STAFF NURSE	05	A	MACDOUGALL CORRECTIONAL INST
10/2/02	CAIN ROBERCENA	EC50	RECREATION SPECIALIST III	RECREATION SUPV	04	E	LEATH CORR INSTIT (WOMEN)
10/2/02	BRITT POOSER PATTY E	AB30	POSTAL CENTER DIR II	POSTAL DIR II	04	A	MACDOUGALL CORRECTIONAL INST
10/2/02	FULMER MARYCATHER	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
10/2/02	HARRISON JOYCE Y	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
10/2/02	HICE CURTIS D	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
10/2/02	THOMAS VERONICA	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	LIVESAY PRE RELEASE CENTER
10/17/02	TAYLOR JOHN H	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	PERRY CORRECTIONAL INSTITUTION
10/17/02	ROLLINGS GARRICK L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION
10/17/02	GALLOWAY BEN T	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION
10/17/02	O CAIN ELIZABETH D	AH10	ADMINISTRATIVE COORD I	ADMIN MGR	05	D	DIVISION IV INSTITUTIONS
10/17/02	ROBINSON SHEILA	JA35	FINGERPRINT SPECIALIST	FINGERPRINT SPECIALIST	03	E	KIRKLAND CORRECTIONAL INSTITUTION
10/17/02	ROWELL JOSEPH D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
10/17/02	RICHARDSON MARK A	KC50	TRADES SPECIALIST V	TRADES SPEC V	05	E	CAMILLE GRAHAM CORRECTIONAL INST
10/17/02	FERNANDEZ WANDA W	AH30	PROGRAM ASSISTANT	CASEWORKER I	04	C	KIRKLAND CORRECTIONAL INSTITUTION
10/17/02	CRAVEN BRIAN K	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
10/17/02	HILL ROY E	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	MACDOUGALL CORRECTIONAL INST
10/17/02	HAGAN GEORGE T	JD60	WARDEN II	WARDEN V	08	B	ALLENDALE CORRECTIONAL INSTITUTION
10/17/02	CSER FRANK M	AH35	PROGRAM COORDINATOR I	CASEWORKER III	05	B	LIEBER CORRECTIONAL INSTITUTION
10/17/02	ELSENPETER BARRON D	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	LEE CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
10/17/02	NEWTON WILLIAM T	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	PALMER PRE RELEASE CENTER
10/17/02	HOUSTON DONNA L	AH10	ADMINISTRATIVE COORD I	ADMIN COORD I	05	A	DIVISION II INSTITUTIONS
10/17/02	JONES DEBORAH W	EA30	REGISTERED NURSE II	HEAD NURSE	06	A	GOODMAN CORRECTIONAL INSTITUTION
10/17/02	MEYER BILLIE J	EA30	REGISTERED NURSE II	HEAD NURSE	06	C	CAMILLE GRAHAM CORRECTIONAL INST
10/17/02	NORCUTT SUSAN C	BH30	RECORDS ANALYST II	RECORDS ANALYST II	04	D	DIV OF CLASSIFICATION & INMATE RECORD
10/17/02	BAZZLE EARL R	AH50	PROGRAM MANAGER II	DIR DIV IV INSTITUTIONS	08	E	DIVISION IV INSTITUTIONS
10/17/02	HUGHES JULIA R	EA20	REGISTERED NURSE I	STAFF NURSE	05	A	MEDICAL SUPPORT
10/17/02	CAUSEY CINDY M	AH15	ADMINISTRATIVE COORD II	ADMIN COORD I	06	A	CAMILLE GRAHAM CORRECTIONAL INST
10/17/02	WALTON JR PERKIN	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	BROAD RIVER CORRECTIONAL INSTITUTION
10/17/02	HICKMON VELT V	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	KERSHAW CORRECTIONAL INSTITUTION
10/17/02	FRIERSON JAMES C	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	PERRY CORRECTIONAL INSTITUTION
10/17/02	LENARD WILLIE J	AH10	ADMINISTRATIVE COORD I	COMMISSARY MGR	05	E	COMMISSARY WHSE INVENTORY/DISTRIBUTION
10/17/02	WILLIAMS JEFFERY S	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	PERRY CORRECTIONAL INSTITUTION
10/17/02	CROCKETT BEULAH M	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION
10/17/02	DIXON ROY R	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEE CORRECTIONAL INSTITUTION
11/2/02	NELSON JERLEAN J	AA50	ADMIN SPECIALIST II	ADMIN SPEC B	03	A	MEDICAL SUPPORT
11/2/02	SHIVER JEFFERY A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KIRKLAND CORRECTIONAL INSTITUTION
11/2/02	GREGG VALERIE L	AH30	PROGRAM ASSISTANT	CASEWORKER I	04	C	BROAD RIVER CORRECTIONAL INSTITUTION
11/2/02	FLEMING DALE W	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MCCORMICK CORRECTIONAL INSTITUTION
11/2/02	SEWARD DARREN R	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	KERSHAW CORRECTIONAL INSTITUTION
11/2/02	WYATT SHANNON L	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	LIVESAY PRE RELEASE CENTER
11/2/02	WRIGHT AUDRA D	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	PALMER PRE RELEASE CENTER
11/2/02	JENKINS LEROY	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON CORRECTIONAL INSTITUTION
11/2/02	MCCRAY SHELBRA D	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	TURBEVILLE CORRECTIONAL INSTITUTION
11/2/02	HARPER SR TOM J	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION
11/2/02	CODY JR TERRY C	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
11/2/02	JONES ROBERT J	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	A	TRENTON CORRECTIONAL INSTITUTION
11/2/02	HUGHES JOE L	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	D	MANNING CORRECTIONAL INSTITUTION
11/2/02	WILLIAMS ANTHONY D	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	LOWER SAVANNAH PRE RELEASE CENTER
11/2/02	SMITH CHARLES	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	PALMER PRE RELEASE CENTER

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
11/2/02	YOUNG JOHN E	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON CORRECTIONAL INSTITUTION
11/2/02	WALTZ DONALD R	GA40	HUMAN SERVICES SPEC II	COUNSEL SUBSTITUTE	04	A	DIV OF CLASSIFICATION & INMATE RECORD
11/2/02	AMICK DONNA C	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	D	MEDICAL SUPPORT
11/2/02	KNIGHT ROBERT L	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION
11/2/02	CARWELL JOHN L	AH10	ADMINISTRATIVE COORD I	CANTEEN MGR IV	05	C	BROAD RIVER CORRECTIONAL INSTITUTION
11/2/02	BUTLER THOMAS D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LIEBER CORRECTIONAL INSTITUTION
11/2/02	RICE GEOFFREY	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MCCORMICK CORRECTIONAL INSTITUTION
11/2/02	AIKENS VALORIE J	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MCCORMICK CORRECTIONAL INSTITUTION
11/2/02	SANE DAVE W	AH30	PROGRAM ASSISTANT	INDUSTRIES SUPV	04	A	ALLENDALE CORRECTIONAL INSTITUTION
11/2/02	WISE DEBRA M	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST I	04	D	KIRKLAND CORRECTIONAL INSTITUTION
11/2/02	DAVIS MARIE A	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION
11/2/02	WOODS DOROTHY D	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST I	04	D	KIRKLAND CORRECTIONAL INSTITUTION
11/2/02	THOMPSON WAYNE R	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
11/2/02	ENTZMINGER VALENCIA A	AH30	PROGRAM ASSISTANT	CASEWORKER I	04	C	KIRKLAND CORRECTIONAL INSTITUTION
11/2/02	FISHER JR JIMMY L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
11/2/02	DEASON JR JAMES E	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK CORRECTIONAL INSTITUTION
11/2/02	SIMMONS TERRY L	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	LOWER SAVANNAH PRE RELEASE CENTER
11/2/02	MARSHALL STEPHANIE R	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK CORRECTIONAL INSTITUTION
11/2/02	NEWSOME TRAVIS E	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
11/2/02	DAVIS KENNETH W	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
11/2/02	WILLIAMS THONEY C	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION
11/2/02	BAKER KATHRYN D	AH10	ADMINISTRATIVE COORD I	ADMIN COORD I	05	A	DIVISION OF PROGRAMS & SERVICES
11/2/02	MAYWEATHER ERIC D	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	TRENTON CORRECTIONAL INSTITUTION
11/2/02	DEMUMBREUM PATRICIA A	EA30	REGISTERED NURSE II	HEAD NURSE	06	A	LIEBER CORRECTIONAL INSTITUTION
11/2/02	STOUDEMIRE LONNIE C	KA30	BUILDING/GROUNDS MGR	BUILDING/GROUNDS MGR	06	A	FACILITIES MANAGEMENT
11/2/02	RICHARDSON MALLIE L	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	WATEREE RIVER CORRECTIONAL INSTITUTION
11/2/02	JAMES RICARDO L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION
11/2/02	MACK RHONDA M	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS III	05	A	TURBEVILLE CORRECTIONAL INSTITUTION
11/2/02	REDDEN MICHELLE L	JA80	INSPECTOR II	OPERATIONAL REVIEW MGR	04	E	TYGER RIVER CORRECTIONAL INSTITUTION
11/2/02	JENNINGS EFREM Z	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KIRKLAND CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
11/2/02	PASLEY MYRA F	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS III	05	A	TURBEVILLE CORRECTIONAL INSTITUTION
11/17/02	WHITTINGTON ANTHONY L	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	EVANS CORRECTIONAL INSTITUTION
11/17/02	ADCOX DONALD E	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
11/17/02	FOWLER TOMMY D	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
11/17/02	MOORE LORETTA	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LEATH CORR INSTIT (WOMEN)
11/17/02	FOSTER OCTAVIA	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	CATAWBA PRE RELEASE CENTER
11/17/02	RODGERS LAVATTA D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEATH CORR INSTIT (WOMEN)
11/17/02	SLIGH JR JAMES E	AH50	PROGRAM MANAGER II	DIV DIR CLASS & RECDS	08	D	DIV OF CLASSIFICATION & INMATE RECORD
11/17/02	POUGH JR JOHN O	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION
11/17/02	ENGRAM LISA	GA60	HUMAN SERVICES COORD II	CLIN CORR COUNS V	06	B	TURBEVILLE CORRECTIONAL INSTITUTION
11/17/02	MEARS LOIS A	EA20	REGISTERED NURSE I	STAFF NURSE	05	A	MACDOUGALL CORRECTIONAL INST
11/17/02	COSTA ANGELO J	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	WATKINS PRE RELEASE CENTER
11/17/02	SHIVERS MICHAEL T	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
11/17/02	WIGGINS BARBARA A	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST I	04	A	BROAD RIVER CORRECTIONAL INSTITUTION
11/17/02	BOULWARE JR ESAU	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
11/17/02	WILLIAMS BETHEL	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE CORRECTIONAL INSTITUTION
11/17/02	HALL TAMMY W	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION
11/17/02	SAMPSON CURTIS T	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	EVANS CORRECTIONAL INSTITUTION
11/17/02	LEWIS NANCY M	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
11/17/02	BAILEY DENISE A	AH30	PROGRAM ASSISTANT	CASEWORKER I	04	C	LIEBER CORRECTIONAL INSTITUTION
11/17/02	BLOUNT JAMES E	KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	TURBEVILLE CORRECTIONAL INSTITUTION
11/17/02	LIVINGSTON JACQUELINE	AA50	ADMIN SPECIALIST II	ADMIN SPEC B	03	A	CAMILLE GRAHAM CORRECTIONAL INST
11/17/02	ESTRADA ROBERTO I	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KIRKLAND CORRECTIONAL INSTITUTION
11/17/02	TYLER DARRELL L	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	ALLENDALE CORRECTIONAL INSTITUTION
11/17/02	BOYD GARY A	AH50	PROGRAM MANAGER II	DIV DIR INMATE SVCS	08	A	INMATE SERVICES
11/17/02	JONES JR CALVIN	GA50	HUMAN SERVICES COORD I	HUMAN SVCS COORD I	05	D	MANNING CORRECTIONAL INSTITUTION
11/17/02	SIBERT CAROLYN	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEATH CORR INSTIT (WOMEN)
12/2/02	STEWART ROGER D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LIEBER CORRECTIONAL INSTITUTION
12/2/02	CARROLL JOHN C	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LIEBER CORRECTIONAL INSTITUTION
12/2/02	SMALL TAMMY V	AD01	FISCAL TECHNICIAN I	ACCT TECH II	03	D	INDUSTRIES ADMINISTRATION NN

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
12/2/02	DEAS STEPHANIE A	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEATH CORR INSTIT (WOMEN)
12/2/02	CROMER PERNELL	AH40	PROGRAM COORDINATOR II	CAPTAIN III	06	C	DIV OF CLASSIFICATION & INMATE RECORD
12/2/02	CROMER PERNELL	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	DIV OF CLASSIFICATION & INMATE RECORD
12/2/02	PRIMUS REGINALD T	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION
12/2/02	ROBINSON JR JAMES	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
12/2/02	WILLIAMS JERAMY L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	RIDGELAND CORR INSTITUTION
12/2/02	MUHAMMAD KHALID A	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	STEVENSON CORRECTIONAL INSTITUTION
12/2/02	FLEMING NANNETTE	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	TRENTON CORRECTIONAL INSTITUTION
12/2/02	BROWN CHERYL L	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS III	05	A	GOODMAN CORRECTIONAL INSTITUTION
12/2/02	HADDOCK MICHAEL C	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	RIDGELAND CORR INSTITUTION
12/2/02	MILLER CHARLES W	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	KERSHAW CORRECTIONAL INSTITUTION
12/2/02	WILLIAMS TIFFINEY D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MCCORMICK CORRECTIONAL INSTITUTION
12/2/02	GASTON JANNITA C	JD55	WARDEN I	WARDEN III	07	D	GOODMAN CORRECTIONAL INSTITUTION
12/2/02	SCOTLAND SHARON D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	PERRY CORRECTIONAL INSTITUTION
12/2/02	HALL GLORIA V	AD01	FISCAL TECHNICIAN I	ACCT TECH II	03	D	FINANCIAL ACCOUNTING
12/2/02	SCRIVEN AUDREY	AH30	PROGRAM ASSISTANT	PRGM ASST	04	E	RIDGELAND CORR INSTITUTION
12/2/02	JENKINS VALJEAN E	EA80	NURSE ADMINISTRATOR/MGR II	HEALTH CARE AUTHORITY III	07	D	TURBEVILLE CORRECTIONAL INSTITUTION
12/2/02	GRAVES ROSE M	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	EVANS CORRECTIONAL INSTITUTION
12/2/02	HUDSON ANGELA F	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LEE CORRECTIONAL INSTITUTION
12/2/02	TUCKER EVA S	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	INMATE BUS TERMINAL
12/2/02	ROBINSON GROVER J	AH30	PROGRAM ASSISTANT	TRACTOR TRAILER DRIVER	04	E	COMMISSARY WHSE INVENTORY/DISTRIBUTION
12/2/02	MARTIN LINDA J	AH30	PROGRAM ASSISTANT	CASEWORKER I	04	C	MACDOUGALL CORRECTIONAL INST
12/2/02	COVINGTON ANGELIA R	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	EVANS CORRECTIONAL INSTITUTION
12/2/02	KERBY GEORGE P	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	NORTHSIDE CORRECTIONAL INSTITUTION
12/2/02	DUCKSON DWAYNE	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
12/2/02	ALFORD ELLIOTT T	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	EVANS CORRECTIONAL INSTITUTION
12/17/02	PROCTOR KENNETH D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
12/17/02	MENDEZ NORBERTO	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION
12/17/02	AIKINS GARY	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	STEVENSON CORRECTIONAL INSTITUTION
12/17/02	TOWER MICHELE M	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	D	CANTEEN WHSE INVENTORY/DISTRIBUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
12/17/02	MILLER SHURRIAL	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KIRKLAND CORRECTIONAL INSTITUTION
12/17/02	CHAPLIN SHERELL T	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	WATEREE RIVER CORRECTIONAL INSTITUTION
12/17/02	BOOZER ANN P	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	PERRY CORRECTIONAL INSTITUTION
12/17/02	WILLIAMS MARY A	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION
12/17/02	ATKINSON BERND	KB30	FOOD SERVICE SPECIALIST VI	FOOD SVC SPEC VI	06	A	WATEREE RIVER CORRECTIONAL INSTITUTION
12/17/02	CARSON RODRIGUS D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	PERRY CORRECTIONAL INSTITUTION
12/17/02	GUERRA FRANK	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	GOODMAN CORRECTIONAL INSTITUTION
12/17/02	SMITH CHARLES	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	PALMER PRE RELEASE CENTER
12/17/02	STEPHENS CATHY J	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	LIVESAY PRE RELEASE CENTER
12/17/02	HAMBY DAVID B	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON CORRECTIONAL INSTITUTION
12/17/02	WILSON RONALD E	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
12/17/02	MILLER MARY E	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	ALLENDALE CORRECTIONAL INSTITUTION
12/17/02	BOGDANY JOHN K	KC50	TRADES SPECIALIST V	TRADES SPEC V	05	C	BROAD RIVER CORRECTIONAL INSTITUTION
12/17/02	JOHNSON DEBORAH	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	STEVENSON CORRECTIONAL INSTITUTION
12/17/02	BARFIELD HOLLEY Z	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST I	04	D	INDUSTRIES ADMINISTRATION NN
12/17/02	GIBSON LATONIA D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
12/17/02	MUNRO YVONNE S	EA10	LICENSED PRACTICAL NURSE	LPN	03	C	KIRKLAND CORRECTIONAL INSTITUTION
12/17/02	SHEEDY MICHAEL W	JD60	WARDEN II	WARDEN V	08	B	TURBEVILLE CORRECTIONAL INSTITUTION
12/17/02	EDWARDS DARRELL M	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
12/17/02	ROBERTS SAMMIE L	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	WATEREE RIVER CORRECTIONAL INSTITUTION
12/17/02	BERRY MELANIE C	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
12/17/02	EDMOND SMITH GLORIA F	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	CAMILLE GRAHAM CORRECTIONAL INST
12/17/02	GIOTTO BRYAN J	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION
12/17/02	JENNINGS EFREM Z	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
12/17/02	RAMSEY STEVEN E	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
1/2/03	JEFFERSON JAMES R	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	KERSHAW CORRECTIONAL INSTITUTION
1/2/03	SIMPSON RODNEY C	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	RIDGELAND CORR INSTITUTION
1/2/03	SHIVER JEFFERY A	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
1/2/03	MILLER SHURRIAL	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
1/2/03	GREEN MELINDA R	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	RIDGELAND CORR INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
1/2/03	FRAZIER NIYOKA S	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
1/2/03	SMITH HARRISON T	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	KERSHAW CORRECTIONAL INSTITUTION
1/2/03	PARKER BELINDA D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
1/2/03	LANG MICHAEL D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	RIDGELAND CORR INSTITUTION
1/2/03	COMMANDER LEVERON	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
1/2/03	CHASE KATHLEEN K	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	NORTHSIDE CORRECTIONAL INSTITUTION
1/2/03	FOSTER RICHARD E	JD40	CORRECTIONAL OFFICER III	LIEUTENANT I	05	A	COMMISSARY WHSE INVENTORY/DISTRIBUTION
1/2/03	SMITH JIMMY M	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	CATAWBA PRE RELEASE CENTER
1/2/03	DOUGHTY DERRICK K	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
1/2/03	SIMPSON JOHN T	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
1/2/03	MATTHEWS LENDRA K	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	EVANS CORRECTIONAL INSTITUTION
1/2/03	JONES KEANNA L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION
1/2/03	YOUNG DOUGLAS G	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	PERRY CORRECTIONAL INSTITUTION
1/2/03	BRYANT JOHNNIE L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	RIDGELAND CORR INSTITUTION
1/2/03	RICE RECO O	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
1/2/03	AUMOEUALOGO MATOKA A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	EVANS CORRECTIONAL INSTITUTION
1/2/03	WILLIAMS DAVITTA M	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	RIDGELAND CORR INSTITUTION
1/2/03	MCGRAW JR WILBERT	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
1/15/03	MAYNARD GARY D	AH50	PROGRAM MANAGER II	PRGM MGR II	08	A	AGENCY DIRECTOR
1/17/03	WEST CHARLES R	JD35	CORRECTIONAL OFFICER II	LIEUTENANT II	04	E	WATEREE RIVER CORRECTIONAL INSTITUTION
1/17/03	GAMBLE SUSAN B	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	PALMER PRE RELEASE CENTER
1/17/03	DOZIER NIXON I	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	WATEREE RIVER CORRECTIONAL INSTITUTION
1/17/03	HOLLAND KYLE C	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
1/17/03	GRECCO CHARLOTTE	EA60	NURSE PRACTITIONER III	NURSE PRACTITIONER	07	E	LEE CORRECTIONAL INSTITUTION
1/17/03	JOHNSON LISA M	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION
1/17/03	BRIGGS JESSE R	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	STEVENSON CORRECTIONAL INSTITUTION
1/17/03	KNEPP SAMUEL G	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION
1/17/03	THOMPSON WAYNE R	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION
1/17/03	TUTEN JOHN W	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON CORRECTIONAL INSTITUTION
1/17/03	WILLIAMS LAKESHA S	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
1/17/03	FALLIN ROBERT E	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KIRKLAND CORRECTIONAL INSTITUTION
1/17/03	BECK BOBBIE O	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
1/17/03	JOHNSON SAMMIE L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION
1/17/03	WILSON VINCENT E	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MACDOUGALL CORRECTIONAL INST
1/17/03	CATOE SAMUEL B	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION
1/17/03	REDDEN MICHELLE L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEATH CORR INSTIT (WOMEN)
1/17/03	MACK ERIC	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION
1/17/03	FORD KEVIN	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	KERSHAW CORRECTIONAL INSTITUTION
1/17/03	ESPOSITO ROBERT C	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	BLANTON DAVID W	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION
2/2/03	YOUNG DESIREE G	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	GOODMAN CORRECTIONAL INSTITUTION
2/2/03	WOOD VALERIE	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	STEVENSON CORRECTIONAL INSTITUTION
2/2/03	OWENS WENDY D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEATH CORR INSTIT (WOMEN)
2/2/03	GRAHAM WILLIE M	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	PALMER PRE RELEASE CENTER
2/2/03	VOGT LE ANN M	AH45	PROGRAM MANAGER I	PRGM MGR I	07	A	MENTAL HEALTH
2/2/03	VOGT LE ANN M	AH45	PROGRAM MANAGER I	PRGM MGR I	07	A	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	VOGT LE ANN M	AH45	PROGRAM MANAGER I	PRGM MGR I	07	A	MENTAL HEALTH
2/2/03	VOGT LE ANN M	AH45	PROGRAM MANAGER I	PRGM MGR I	07	A	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	WHEELER JAMES E	KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	WATEREE RIVER CORRECTIONAL INSTITUTION
2/2/03	CARTER MICHELE Y	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEATH CORR INSTIT (WOMEN)
2/2/03	DENNIS PAUL N	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS III	05	A	MENTAL HEALTH
2/2/03	DENNIS PAUL N	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS III	05	A	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	DENNIS PAUL N	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS III	05	A	MENTAL HEALTH
2/2/03	DENNIS PAUL N	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS III	05	A	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	YOUNG BRIAN R	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
2/2/03	COOK NATHAN J	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
2/2/03	TOMLIN BILLY E	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND CORR INSTITUTION
2/2/03	GIBBS JAMES L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LIEBER CORRECTIONAL INSTITUTION
2/2/03	JOHNSON LULA C	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	BROAD RIVER CORRECTIONAL INSTITUTION
2/2/03	NESBITT STANLEY O	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	STEVENSON CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

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					B	E	
					A	V	
EFF	EMPLOYEE	JOB	STATE	INTERNAL	N	E	
DATE	NAME	CLASS	TITLE	TITLE	D	L	LOCATION
2/2/03	MCFADDEN JAKE W	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	MENTAL HEALTH
2/2/03	MCFADDEN JAKE W	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	MCFADDEN JAKE W	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	MENTAL HEALTH
2/2/03	MCFADDEN JAKE W	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	MOORE KEVIN	GA60	HUMAN SERVICES COORD II	CLIN CORR COUNS V	06	B	MENTAL HEALTH
2/2/03	MOORE KEVIN	GA60	HUMAN SERVICES COORD II	CLIN CORR COUNS V	06	B	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	MOORE KEVIN	GA60	HUMAN SERVICES COORD II	CLIN CORR COUNS V	06	B	MENTAL HEALTH
2/2/03	MOORE KEVIN	GA60	HUMAN SERVICES COORD II	CLIN CORR COUNS V	06	B	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	RHEA ROGERS SAUNDRA A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	NICKENS TRACY M	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	MENTAL HEALTH
2/2/03	NICKENS TRACY M	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	NICKENS TRACY M	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	MENTAL HEALTH
2/2/03	NICKENS TRACY M	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	ELIE LENA	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION
2/2/03	SIMS QUANDA D	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	MENTAL HEALTH
2/2/03	SIMS QUANDA D	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	SIMS QUANDA D	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	MENTAL HEALTH
2/2/03	SIMS QUANDA D	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	KIRKLAND CORRECTIONAL INSTITUTION
2/2/03	HILL CORINNE A	EA30	REGISTERED NURSE II	HEAD NURSE	06	A	TURBEVILLE CORRECTIONAL INSTITUTION
2/2/03	WIGGINS JR JOHN	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND CORR INSTITUTION
2/17/03	YOUNG DESIREE G	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	LOWER SAVANNAH PRE RELEASE CENTER
2/17/03	LAMER TAMMY C	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TRENTON CORRECTIONAL INSTITUTION
2/17/03	COBB JOHNNY D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEATH CORR INSTIT (WOMEN)
2/17/03	JAMBARD JOSEPH R	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE CORRECTIONAL INSTITUTION
2/17/03	BARR THOMAS A	JD40	CORRECTIONAL OFFICER III	LIEUTENANT I	05	A	COMMISSARY WHSE INVENTORY/DISTRIBUTION
2/17/03	FOSTER RICHARD E	JD40	CORRECTIONAL OFFICER III	LIEUTENANT I	05	A	GOODMAN CORRECTIONAL INSTITUTION
2/17/03	HENNEGHAN ANDREA L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
2/17/03	MCFADDEN GRACIE A	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	WATEREE RIVER CORRECTIONAL INSTITUTION
2/17/03	HENNEGHAN LISA C	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
2/17/03	WOODWARD STEVEN P	AH50	PROGRAM MANAGER II	ASSOC DIR	08	D	OFFICE OF MEDICAL & HEALTH SERVICES

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
2/17/03	WOODWARD STEVEN P	AH50	PROGRAM MANAGER II	ASSOC DIR	08	D	KIRKLAND CORRECTIONAL INSTITUTION
2/17/03	BRINKLEY JOHNNY F	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MCCORMICK CORRECTIONAL INSTITUTION
2/17/03	CLAY ROBERT D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK CORRECTIONAL INSTITUTION
2/17/03	MANGUAL RAMON O	JD40	CORRECTIONAL OFFICER III	LIEUTENANT I	05	A	KIRKLAND CORRECTIONAL INSTITUTION
2/17/03	MARSHALL ERNEST W	KB30	FOOD SERVICE SPECIALIST VI	FOOD SVC SPEC VI	06	A	MANNING CORRECTIONAL INSTITUTION
2/17/03	TARPLEY WANDA D	AH50	PROGRAM MANAGER II	MGR INSTITUTIONAL SVCS	08	D	OFFICE OF MEDICAL & HEALTH SERVICES
2/17/03	TARPLEY WANDA D	AH50	PROGRAM MANAGER II	MGR INSTITUTIONAL SVCS	08	D	KIRKLAND CORRECTIONAL INSTITUTION
2/17/03	SIMS GEORGE B	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION
2/17/03	BROWN CURTIS	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	BROAD RIVER CORRECTIONAL INSTITUTION
3/2/03	CLAWSON PANSY M	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	LIVESAY PRE RELEASE CENTER
3/2/03	RANDOLPH YOUNDIA M	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TURBEVILLE CORRECTIONAL INSTITUTION
3/2/03	GORDON NORBERTO J	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TURBEVILLE CORRECTIONAL INSTITUTION
3/2/03	REARDON EPHRAIM L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KIRKLAND CORRECTIONAL INSTITUTION
3/2/03	PATTERSON BRYAN P	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
3/2/03	ROBERSON LEIGH M	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LEE CORRECTIONAL INSTITUTION
3/2/03	MATTHEWS BARBARA A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TURBEVILLE CORRECTIONAL INSTITUTION
3/2/03	COLEMAN ARNA J	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TRENTON CORRECTIONAL INSTITUTION
3/2/03	COX LINDLEY M	EA20	REGISTERED NURSE I	STAFF NURSE	05	A	MENTAL HEALTH
3/2/03	CORLEY ALONZO E	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	ALLENDALE CORRECTIONAL INSTITUTION
3/2/03	MCMATH HARLAN G	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TRENTON CORRECTIONAL INSTITUTION
3/2/03	HARRIS SHARON E	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
3/2/03	FERGUSON TRAMPAS L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
3/2/03	GASKINS CURTIS	JD35	CORRECTIONAL OFFICER II	LIEUTENANT II	04	E	WATEREE RIVER CORRECTIONAL INSTITUTION
3/2/03	HODGE RACHEL R	EA20	REGISTERED NURSE I	STAFF NURSE	05	E	MENTAL HEALTH
3/2/03	THOMAS JOHN J	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	KERSHAW CORRECTIONAL INSTITUTION
3/2/03	MCMORRIS KAREN	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
3/2/03	MCDANIEL LURENA W	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE CORRECTIONAL INSTITUTION
3/2/03	TOBIN EARL D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KIRKLAND CORRECTIONAL INSTITUTION
3/2/03	ROBERTS JR LESLIE W	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE CORRECTIONAL INSTITUTION
3/2/03	CORNWALL GLENDA D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	EVANS CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
3/2/03	ALEXANDER RHONDA R	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
3/17/03	DOWDELL JR EDDIE W	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	TRENTON CORRECTIONAL INSTITUTION
3/17/03	MITCHELL TRACY T	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	ALLENDALE CORRECTIONAL INSTITUTION
3/17/03	FRICKS GAIL W	AH50	PROGRAM MANAGER II	SUPV MED AUDITS/GRIEV BRCH	08	D	OFFICE OF MEDICAL & HEALTH SERVICES
3/17/03	PRIDGEN NADINE L	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	D	OFFICE OF MEDICAL & HEALTH SERVICES
3/17/03	ELMORE JOSEPHINE L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	ALLENDALE CORRECTIONAL INSTITUTION
3/17/03	HOOKS GLORIA A	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	KERSHAW CORRECTIONAL INSTITUTION
3/17/03	THOMAS ADAMS SHELIA	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEE CORRECTIONAL INSTITUTION
3/17/03	DOZIER BARNEY R	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TURBEVILLE CORRECTIONAL INSTITUTION
3/17/03	SCOTT ERICH G	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
3/17/03	JOHNSON PAMELA B	EA80	NURSE ADMINISTRATOR/MGR II	HEALTH CARE AUTHORITY	07	D	CAMILLE GRAHAM CORRECTIONAL INST
3/17/03	DUNLAP LINDA J	EA80	NURSE ADMINISTRATOR/MGR II	PRGM MGR I	07	D	OFFICE OF MEDICAL & HEALTH SERVICES
3/17/03	DUNLAP LINDA J	AH45	PROGRAM MANAGER I	PRGM MGR I	07	E	OFFICE OF MEDICAL & HEALTH SERVICES
3/17/03	BARRETT CAROLYN	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	A	TRENTON CORRECTIONAL INSTITUTION
3/17/03	BROWN MAURICE	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	TRENTON CORRECTIONAL INSTITUTION
3/17/03	FORD JANET Y	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	EVANS CORRECTIONAL INSTITUTION
3/17/03	HANLON DANIEL R	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	EVANS CORRECTIONAL INSTITUTION
3/17/03	SEALEY DAVID E	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
3/17/03	LOADHOLT GERTRUDE O	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	ALLENDALE CORRECTIONAL INSTITUTION
3/17/03	BYNUM ARMITRA V	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	ALLENDALE CORRECTIONAL INSTITUTION
3/17/03	SKEEN BARBARA	AH50	PROGRAM MANAGER II	PROGRAM MANAGER II	08	A	OFFICE OF MEDICAL & HEALTH SERVICES
3/17/03	ABNER JAMES M	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
3/17/03	PHILLIPS JANICE	AH10	ADMINISTRATIVE COORD I	MED REVIEW ADMSTR	05	E	OFFICE OF MEDICAL & HEALTH SERVICES
3/17/03	GILBERT ROBERT E	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
3/17/03	ROCHESTER NELLIE M	EA80	NURSE ADMINISTRATOR/MGR II	PRGM MGR I	07	D	OFFICE OF MEDICAL & HEALTH SERVICES
3/17/03	ROCHESTER NELLIE M	AH45	PROGRAM MANAGER I	PRGM MGR I	07	E	OFFICE OF MEDICAL & HEALTH SERVICES
3/17/03	HIPS DWIGHT D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	EVANS CORRECTIONAL INSTITUTION
3/17/03	ROBERTS JR LESLIE W	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEE CORRECTIONAL INSTITUTION
3/17/03	CONNELLY YVONNE T	EA80	NURSE ADMINISTRATOR/MGR II	PRGM SVC MGR	07	D	MANNING CORRECTIONAL INSTITUTION
3/17/03	CONNELLY YVONNE T	AH45	PROGRAM MANAGER I	PRGM SVC MGR	07	E	MANNING CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
3/17/03	CORNWALL GLENDA D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	EVANS CORRECTIONAL INSTITUTION
3/17/03	HAIRSTON FITZGERALD A	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON CORRECTIONAL INSTITUTION
3/17/03	FRADY DARLENE H	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
3/17/03	FRADY JEFFREY S	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
3/17/03	KELLY DEBORAH B	EA80	NURSE ADMINISTRATOR/MGR II	PRGM SVCS MGR	07	E	MENTAL HEALTH
3/17/03	KELLY DEBORAH B	AH45	PROGRAM MANAGER I	PRGM SVCS MGR	07	E	MENTAL HEALTH
3/17/03	CADDELL JOHN A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
3/17/03	NORMAN WILLIAM C	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MCCORMICK CORRECTIONAL INSTITUTION
3/17/03	WRIGHT CARL M	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	ALLENDALE CORRECTIONAL INSTITUTION
3/17/03	STURKIE PHYLLIS A	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	PALMER PRE RELEASE CENTER
4/2/03	PITTS JULIE R	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	DIVISION OF PROGRAMS & SERVICES
4/2/03	DECESSARD VLADIMIR J	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	EVANS CORRECTIONAL INSTITUTION
4/2/03	REED BRENDA C	AH35	PROGRAM COORDINATOR I	EMPL DRUG TESTING COORD	05	D	HUMAN RESOURCES ADMINISTRATION
4/2/03	O CAIN ELIZABETH D	AH10	ADMINISTRATIVE COORD I	ADMIN MGR	05	D	DIV OF CLASSIFICATION & COMPLIANCE
4/2/03	O CAIN LOUIS E	JA15	INVESTIGATOR III	COORD SECURITY THREAT	05	E	INVESTIGATIONS
4/2/03	CARSON RODRIGUS D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	PERRY CORRECTIONAL INSTITUTION
4/2/03	PERRY TOMMY N	KB30	FOOD SERVICE SPECIALIST VI	FOOD SVC SPEC VI	06	A	LEE CORRECTIONAL INSTITUTION
4/2/03	HOLIDAY DELORES	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION
4/2/03	MUELLER CAROLE J	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	D	DIVISION OF OPERATIONS
4/2/03	DEAN ALTON M	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	PERRY CORRECTIONAL INSTITUTION
4/2/03	EAST MARCUS	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
4/2/03	TRIPLETT SR EARNEST C	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION
4/2/03	SEALS LINDY L	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION
4/2/03	DALY JR BRIAN J	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	PERRY CORRECTIONAL INSTITUTION
4/2/03	MCLEOD PHILLIP E	JD60	WARDEN II	WARDEN V	08	B	KERSHAW CORRECTIONAL INSTITUTION
4/2/03	KRAJEWSKI GEORGE M	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
4/2/03	FREDERICK CARL J	JD55	WARDEN I	OPERATIONS COORDINATOR	07	D	DIVISION OF OPERATIONS
4/2/03	KIRSCH THOMAS E	KB30	FOOD SERVICE SPECIALIST VI	FOOD SVC SPEC VI	06	A	FOOD SERVICES ADMINISTRATION
4/2/03	CORBITT JACQUELINE Y	AH30	PROGRAM ASSISTANT	PRGM ASST	04	B	HUMAN RESOURCES ADMINISTRATION
4/2/03	COUNTS ANNIE G	KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	ALLENDALE CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04 SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
4/2/03	BLAKENEY ALLEN A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION
4/2/03	JOSEPH JOYA	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
4/2/03	SAYLES VENCINER C	AC07	SUPPLY MANAGER I	SUPPLY MGR I	04	A	TURBEVILLE CORRECTIONAL INSTITUTION
4/2/03	MIRO GERALDINE P	AH50	PROGRAM MANAGER II	DIRECTOR PROG SERVICES	08	E	DIVISION OF PROGRAMS & SERVICES
4/2/03	BEINOR MICHAEL J	EB50	PHYSICIAN II	PHYSICIAN II	10	A	BROAD RIVER CORRECTIONAL INSTITUTION
4/2/03	GIBBONS MICHELLE A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	EVANS CORRECTIONAL INSTITUTION
4/2/03	RENNICK AUBREY R	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
4/2/03	MONTGOMERY SUSAN A	AH45	PROGRAM MANAGER I	GOVERNMENT SVCS MGR	07	B	OFFICE OF GENERAL COUNSEL
4/2/03	PINSON ELAINE K	JD60	WARDEN II	WARDEN IV	08	A	WALDEN CORRECTIONAL INSTITUTION
4/2/03	BUTLER ROSETTA K	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	CAMILLE GRAHAM CORRECTIONAL INST
4/2/03	RONEY JOSEPH A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION
4/2/03	YOUNG TELISHIA L	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	LIVESAY PRE RELEASE CENTER
4/2/03	ANDERSON JUDY C	JD60	WARDEN II	WARDEN III	08	A	CAMILLE GRAHAM CORRECTIONAL INST
4/2/03	CHAMBERS ERNESTO A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION
4/2/03	HURT STACEY A	AH35	PROGRAM COORDINATOR I	WORKERS COMP COORD I	05	C	HUMAN RESOURCES ADMINISTRATION
4/2/03	HOUSTON DONNA L	AH10	ADMINISTRATIVE COORD I	ADMIN COORD I	05	A	DIVISION OF PROGRAMS & SERVICES
4/2/03	KENDALL CATHERINE T	JD55	WARDEN I	WARDEN I	07	B	LEATH CORR INSTIT (WOMEN)
4/2/03	WILSON VINCENT E	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	COASTAL PRE RELEASE CENTER
4/2/03	ALEXANDER JR LARRY W	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
4/2/03	CLEA STACEY L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION
4/2/03	BESSINGER LAURIE F	JD60	WARDEN II	WARDEN II	08	B	OFFICE OF INSPECTOR GENERAL
4/2/03	REESE TROY L	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	STEVENSON CORRECTIONAL INSTITUTION
4/2/03	BRIDGERS EMERY L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEATH CORR INSTIT (WOMEN)
4/2/03	COOK RONALD	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MCCORMICK CORRECTIONAL INSTITUTION
4/17/03	BENTON JOHN J	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	COASTAL PRE RELEASE CENTER
4/17/03	LINDSEY YAPHET O	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WALDEN CORRECTIONAL INSTITUTION
4/17/03	ELLIS JOSEPH W	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	PERRY CORRECTIONAL INSTITUTION
4/17/03	YOUNG WILLIE MAE	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	PALMER PRE RELEASE CENTER
4/17/03	MURRAY THOMAS W	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MACDOUGALL CORRECTIONAL INST
4/17/03	JINKS JORDAN J	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	INMATE BUS TERMINAL

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04 SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
4/17/03	HUDSON GORDON A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	PERRY CORRECTIONAL INSTITUTION
4/17/03	GETER MARY J	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	KERSHAW CORRECTIONAL INSTITUTION
4/17/03	BROWNING MARY E	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	LIVESAY PRE RELEASE CENTER
4/17/03	BAZZLE EARL R	JD60	WARDEN II	DIR DIV IV INSTITUTIONS	08	E	PERRY CORRECTIONAL INSTITUTION
4/17/03	BAZZLE EARL R	AH50	PROGRAM MANAGER II	DIR DIV IV INSTITUTIONS	08	E	PERRY CORRECTIONAL INSTITUTION
4/17/03	ATKINS ZYLTHIA C	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WALDEN CORRECTIONAL INSTITUTION
5/2/03	INGRAM EMIL A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
5/2/03	MUELLER CAROLE J	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
5/2/03	WOODS DOROTHY D	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST I	04	D	SECURITY
5/2/03	TRAMMEL TERRY M	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
5/2/03	FOX YELDELL ANGEL	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
5/2/03	EVANS RENEE Y	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	RIDGELAND CORR INSTITUTION
5/2/03	WALKER JR ALFONZIA	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	RIDGELAND CORR INSTITUTION
5/17/03	MANLEY JR VIRGIL L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
5/17/03	MOSES JR ROBERT L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
5/17/03	BROWN ERICA D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	RIDGELAND CORR INSTITUTION
5/17/03	ROBERSON LEIGH M	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
5/17/03	WHITAKER BURRELL DESHAWN M	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST I	04	A	DIVISION OF OPERATIONS
5/17/03	SHORT LITTLE J	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	EVANS CORRECTIONAL INSTITUTION
5/17/03	CRAWFORD ROBERT L	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION
5/17/03	BIDDINGER JR HAROLD W	KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	LEE CORRECTIONAL INSTITUTION
5/17/03	BROWN CAROLYN D	GA40	HUMAN SERVICES SPEC II	HUMAN SVCS SPEC II	04	C	NORTHSIDE CORRECTIONAL INSTITUTION
5/17/03	TRANSUE L W	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	PERRY CORRECTIONAL INSTITUTION
5/17/03	REED RODNEY R	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	STEVENSON CORRECTIONAL INSTITUTION
5/17/03	GOSNELL GREGORY C	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	PERRY CORRECTIONAL INSTITUTION
5/17/03	JAMESON RON B	AH35	PROGRAM COORDINATOR I	CASEWORKER I	05	B	LIVESAY PRE RELEASE CENTER
5/17/03	FIELDS ANNA M	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	ALLENDALE CORRECTIONAL INSTITUTION
5/17/03	GEERY ANDREW S	AJ63	DATA BASE ADMINISTRATOR I	DATA BASE ADMINISTRATOR	06	C	SYSTEMS OPERATION AND SUPPORT
5/17/03	BROWN ALBERT J	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	INMATE BUS TERMINAL
6/2/03	WILSON KAREN J	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC IV	03	E	TYGER RIVER CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BASE	LEVEL	LOCATION
6/2/03	BLACKS CANDICE L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TRENTON CORRECTIONAL INSTITUTION
6/2/03	ROBINSON VANESSA A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
6/2/03	HARPER SR TOM J	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
6/2/03	WILLIAMS CAROL C	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		CAMILLE GRAHAM CORRECTIONAL INST
6/2/03	SCOTT BRENDA L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	EVANS CORRECTIONAL INSTITUTION
6/2/03	THOMAS VALERIE D	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON CORRECTIONAL INSTITUTION
6/2/03	WALTZ DONALD R	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	KERSHAW CORRECTIONAL INSTITUTION
6/2/03	JOYNER JR FRANKLIN R	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION
6/2/03	HAMMETT RAHEEM S	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LEE CORRECTIONAL INSTITUTION
6/2/03	COLEMAN KEVIN A	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TURBEVILLE CORRECTIONAL INSTITUTION
6/2/03	WIGGINS MARCUS A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MCCORMICK CORRECTIONAL INSTITUTION
6/2/03	TRAMMEL TERRY M	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
6/2/03	KOLB MARTIN G	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION
6/2/03	ROWE MICHAEL A	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TURBEVILLE CORRECTIONAL INSTITUTION
6/2/03	YELDELL PATRICIA J	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	LEATH CORR INSTIT (WOMEN)
6/2/03	WEBB MELISSA R	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	LEATH CORR INSTIT (WOMEN)
6/2/03	WILLIAMS RANDALL L	JD50	CORRECTIONAL OFFICER IV	CAPTAIN II	06	A	COASTAL PRE RELEASE CENTER
6/2/03	TOLAND CARELETHA	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	CAMILLE GRAHAM CORRECTIONAL INST
6/2/03	LAWRENCE JR CLARENCE A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK CORRECTIONAL INSTITUTION
6/2/03	HARRISON RICKIE	AH25	ADMINISTRATIVE MGR II	ADMINISTRATIVE MANAGER	08	B	INDUSTRIES ADMINISTRATION NN
6/17/03	JAMES CHAD M	EA20	REGISTERED NURSE I	STAFF NURSE	05	A	MENTAL HEALTH
6/17/03	PITTS JULIE R	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	INMATE SERVICES
6/17/03	BOWERS DAVID C	AD12	AUDITOR IV	AUDITS SUPV	06	D	OFFICE OF BUDGET AND RESOURCE
6/17/03	DAWKINS STEPHANIE N	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
6/17/03	MCKNIGHT PORTER L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE CORRECTIONAL INSTITUTION
6/17/03	RIDGES ANTHONY R	GA40	HUMAN SERVICES SPEC II	INMATE REP	04	A	DIVISION OF OPERATIONS
6/17/03	JONES TERRY L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION
6/17/03	NOLAN STEVEN L	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	EVANS CORRECTIONAL INSTITUTION
6/17/03	ELLIS GERALDINE M	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEATH CORR INSTIT (WOMEN)
6/17/03	TONEY MELVIN L	JD35	CORRECTIONAL OFFICER II	LIEUTENANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

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EFF	EMPLOYEE	JOB	STATE	INTERNAL	N	E	
DATE	NAME	CLASS	TITLE	TITLE	D	L	LOCATION
6/17/03	SIMS WILBERT S	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KIRKLAND CORRECTIONAL INSTITUTION
6/17/03	JONES VALERIE C	GA40	HUMAN SERVICES SPEC II	COUNSEL SUBSTITUTE	04	A	DIVISION OF OPERATIONS
6/17/03	SMITH TALMADGE A	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		STEVENSON CORRECTIONAL INSTITUTION
6/17/03	MYERS DEBRA L	KB30	FOOD SERVICE SPECIALIST VI	FOOD SVC SPEC VI	06	A	LIEBER CORRECTIONAL INSTITUTION
6/17/03	HAMRICK DANNY R	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEATH CORR INSTIT (WOMEN)
6/17/03	CARTER MICHELE Y	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEATH CORR INSTIT (WOMEN)
6/17/03	ROOF MARTHA L	AD12	AUDITOR IV	AUDITS SUPV	06	D	OFFICE OF BUDGET AND RESOURCE
6/17/03	HENRY RESIA M	CB30	TEACHER ASSISTANT	TEACHER ASSISTANT	02	E	LEE CORRECTIONAL INSTITUTION
6/17/03	BALDWIN KENNETH L	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION
6/17/03	POUGH JR JOHN O	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION
6/17/03	ARMSTRONG JEROME K	GA40	HUMAN SERVICES SPEC II	COUNSEL SUBSTITUTE	04	A	DIVISION OF OPERATIONS
6/17/03	CHARLES LISA L	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	GOODMAN CORRECTIONAL INSTITUTION
6/17/03	GIBSON DORIS Y	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	KERSHAW CORRECTIONAL INSTITUTION
6/17/03	POWELL CLARKE M	JA15	INVESTIGATOR III	INVESTIGATOR IV	05	B	INVESTIGATIONS
6/17/03	ROLLINS ALZENA A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE CORRECTIONAL INSTITUTION
6/17/03	HARTLEY JOHNNY D	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	TRENTON CORRECTIONAL INSTITUTION
6/17/03	BOGGS III MANCEL R	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	WATEREE RIVER CORRECTIONAL INSTITUTION
6/17/03	THOMAS BETTY J	GA40	HUMAN SERVICES SPEC II	INMATE REP	04	A	DIVISION OF OPERATIONS
6/17/03	MAYS III HAMMIE B	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE CORRECTIONAL INSTITUTION
6/17/03	SHEPPARD ANN D	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LIEBER CORRECTIONAL INSTITUTION
6/17/03	FERGUSON TRAMPAS L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
6/17/03	NEWBY CHERYL L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LEATH CORR INSTIT (WOMEN)
6/17/03	ROGERS CHARLES E	GA40	HUMAN SERVICES SPEC II	INMATE REP	04	A	DIVISION OF OPERATIONS
6/17/03	BROWN MICHAEL	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LIEBER CORRECTIONAL INSTITUTION
6/17/03	PLATT BRANDY M	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE CORRECTIONAL INSTITUTION
6/17/03	THOMPSON CLASSE M	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LIEBER CORRECTIONAL INSTITUTION
6/17/03	PRESSLEY MERVEL H	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
6/17/03	PERRY KELVIN A	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	STEVENSON CORRECTIONAL INSTITUTION
6/17/03	FRIERSON JAMES C	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	TYGER RIVER CORRECTIONAL INSTITUTION
6/17/03	CATOE SAMUEL B	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

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EFF	EMPLOYEE	JOB	STATE	INTERNAL	N	E	
DATE	NAME	CLASS	TITLE	TITLE	D	L	LOCATION
6/17/03	EMBREY TOMMIE L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
6/17/03	GOMORI GLORIA A	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	LOWER SAVANNAH PRE RELEASE CENTER
6/17/03	WASHINGTON OLIVER L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE CORRECTIONAL INSTITUTION
6/17/03	SYPHERTT TINA H	JD50	CORRECTIONAL OFFICER IV	CAPTAIN II	06	A	LOWER SAVANNAH PRE RELEASE CENTER
6/17/03	WASHINGTON TOMMY L	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
6/17/03	BRANTLEY LAWANDA A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	ALLENDALE CORRECTIONAL INSTITUTION
7/2/03	WATSON SAMUEL	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND CORR INSTITUTION
7/2/03	JACOBS COZETTA S	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	SECURITY
7/2/03	SAPP MELISSA L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
7/2/03	HARPER SR TOM J	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	INMATE BUS TERMINAL
7/2/03	VENNING JACQUELINE L	UB06	GUIDANCE COUNSELOR	GUIDANCE COUNSELOR	00		PALMETTO UNIFIED SCHOOL DISTRICT #1
7/2/03	MULLINEAUX GLEN	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MACDOUGALL CORRECTIONAL INST
7/2/03	LAKIN YVETTE	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		STEVENSON CORRECTIONAL INSTITUTION
7/2/03	WHITE WILLIAM M	JD60	WARDEN II	WARDEN I	08	B	BROAD RIVER CORRECTIONAL INSTITUTION
7/2/03	TAYLOR JEFFREY	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	ALLENDALE CORRECTIONAL INSTITUTION
7/2/03	KNEPP SAMUEL G	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION
7/2/03	LANE GARY D	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	WALDEN CORRECTIONAL INSTITUTION
7/2/03	DAYE BARBARA A	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	TRENTON CORRECTIONAL INSTITUTION
7/2/03	CALDWELL KIMMERLY Y	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST II	04	D	POLICY DEVELOPMENT
7/2/03	HALLETT PAULA J	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	SECURITY
7/2/03	CALWILE ROSALIND A	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	NORTHSIDE CORRECTIONAL INSTITUTION
7/2/03	MCNUTT LINDA J	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	BROAD RIVER CORRECTIONAL INSTITUTION
7/2/03	ADAMS MICHAEL P	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
7/2/03	SIMMONS LEON	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	RIDGELAND CORR INSTITUTION
7/2/03	HODGE RACHEL R	EA30	REGISTERED NURSE II	HEAD NURSE	06	A	KIRKLAND CORRECTIONAL INSTITUTION
7/2/03	GREEN L S	UB02	CERTIFIED TEACHER	CLASSROOM TEACHER	00		MANNING CORRECTIONAL INSTITUTION
7/2/03	CRIDER REBEKAH S	AA75	ADMINISTRATIVE ASSISTANT	ADMIN ASST I	04	A	STATE & LOCAL INSPECTIONS
7/2/03	CAIN ROBERCENA	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
7/2/03	KING MICHAEL L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KERSHAW CORRECTIONAL INSTITUTION
7/2/03	WELCH CINDY Y	AA50	ADMIN SPECIALIST II	ADMIN SPEC C	03	C	TURBEVILLE CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
7/2/03	CROSBY RALPH H	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	EVANS CORRECTIONAL INSTITUTION
7/2/03	WILLIAMSON MARY A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	EVANS CORRECTIONAL INSTITUTION
7/17/03	GRANT WAYNE M	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TURBEVILLE CORRECTIONAL INSTITUTION
7/17/03	MILLER GAIL A	AH30	PROGRAM ASSISTANT	INDUSTRIES SUPV II	04	D	TRENTON CORRECTIONAL INSTITUTION
7/17/03	SEIBLES GARY D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER CORRECTIONAL INSTITUTION
7/17/03	BROWN GWYNEEDA	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	STEVENSON CORRECTIONAL INSTITUTION
7/17/03	GAMBLE SUSAN B	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	PALMER PRE RELEASE CENTER
7/17/03	ANDERS JEFFREY	JD50	CORRECTIONAL OFFICER IV	CAPTAIN II	06	A	LIVESAY PRE RELEASE CENTER
7/17/03	CURENTON DORIS	AB30	POSTAL CENTER DIR II	POSTAL DIR II	04	A	KIRKLAND CORRECTIONAL INSTITUTION
7/17/03	STEVENS SHARON A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	MCCORMICK CORRECTIONAL INSTITUTION
7/17/03	ALEXANDER JR FRANKLIN D	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TURBEVILLE CORRECTIONAL INSTITUTION
7/17/03	CHVALA RICHARD N	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TURBEVILLE CORRECTIONAL INSTITUTION
7/17/03	MOORE LINDA B	EA80	NURSE ADMINISTRATOR/MGR II	HEALTH CARE AUTHORITY III	07	D	PERRY CORRECTIONAL INSTITUTION
7/17/03	ROUSE DERICK A	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TURBEVILLE CORRECTIONAL INSTITUTION
7/17/03	BRANHAM BRADLEY W	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KERSHAW CORRECTIONAL INSTITUTION
7/17/03	LANE JOSEPH C	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER CORRECTIONAL INSTITUTION
7/17/03	SEGARS III BAXTER E	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	STEVENSON CORRECTIONAL INSTITUTION
7/17/03	LOTT CHRISTOPHE D	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I (K 9 HANDLER)	04	E	INVESTIGATIONS
7/17/03	ROBINSON LORETTA	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
7/17/03	CLAY ROBERT D	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	INVESTIGATIONS
7/17/03	WELLONS KEITH T	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	WATKINS PRE RELEASE CENTER
7/17/03	MYERS KELVIN I	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LIEBER CORRECTIONAL INSTITUTION
7/17/03	ROXAS JOSE P	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	COASTAL PRE RELEASE CENTER
7/17/03	DAVIS MILLER LILLIAN A	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LIEBER CORRECTIONAL INSTITUTION
7/17/03	BRAYBOY MELVIN W	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TURBEVILLE CORRECTIONAL INSTITUTION
7/17/03	RIVERA MAXIMO	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	INVESTIGATIONS
7/17/03	ATKINS ZYLTHIA C	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	RIDGELAND CORR INSTITUTION
7/17/03	HICKMAN HERMAN L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER CORRECTIONAL INSTITUTION
7/17/03	MACK JAMES I	JD50	CORRECTIONAL OFFICER IV	CAPTAIN III	06	C	TURBEVILLE CORRECTIONAL INSTITUTION
7/17/03	BRANHAM STEVEN A	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	INVESTIGATIONS

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
8/2/03	MILLER MICHAEL L	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	WATEREE RIVER CORRECTIONAL INSTITUTION
8/2/03	DEKREON SCOTT W	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MCCORMICK CORRECTIONAL INSTITUTION
8/2/03	SPEIGHTS THEODORE	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TURBEVILLE CORRECTIONAL INSTITUTION
8/2/03	WRIGHT JOHNNIE	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
8/2/03	BLACKWELL JACKIE L	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	PERRY CORRECTIONAL INSTITUTION
8/2/03	BROWN DAVID	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	EVANS CORRECTIONAL INSTITUTION
8/2/03	CASTALDI DEBORAH J	AJ42	INFO RESOURCE CONSULT I	INFO RES COUNSULTANT II	05	E	RESOURCE & INFORMATION MGMT ADMINIST
8/2/03	BRICE NORMAN M	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	BROAD RIVER CORRECTIONAL INSTITUTION
8/2/03	BISHOP VICKIE D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEATH CORR INSTIT (WOMEN)
8/2/03	JAKES III WILLIAM E	JD50	CORRECTIONAL OFFICER IV	CAPTAIN II	06	A	SECURITY
8/2/03	LONG CHRISTINE E	AH30	PROGRAM ASSISTANT	CASEWORKER I	04	C	KERSHAW CORRECTIONAL INSTITUTION
8/2/03	BUNCUMB JOHNNY	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LIEBER CORRECTIONAL INSTITUTION
8/2/03	BARR THOMAS A	AC09	SUPPLY MANAGER II	LIEUTENANT I	05	B	COMMISSARY WHSE INVENTORY/DISTRIBUTION
8/2/03	AMAKER CRAIG B	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
8/2/03	DALY JR BRIAN J	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	PERRY CORRECTIONAL INSTITUTION
8/2/03	COMMANDER FRANCES M	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TURBEVILLE CORRECTIONAL INSTITUTION
8/2/03	BROWN DENA K	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEATH CORR INSTIT (WOMEN)
8/2/03	GREGG NATHANIEL	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	CAMPBELL PRE RELEASE CENTER
8/2/03	SALAAM AHMED K	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LEE CORRECTIONAL INSTITUTION
8/2/03	JOHNSON CYNTHIA L	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LEE CORRECTIONAL INSTITUTION
8/2/03	WEST JR CLAY	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TURBEVILLE CORRECTIONAL INSTITUTION
8/2/03	SEALEY DAVID E	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LIEBER CORRECTIONAL INSTITUTION
8/2/03	WATSON HAROLD R	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	COASTAL PRE RELEASE CENTER
8/2/03	PATTERSON DENNIS R	AH45	PROGRAM MANAGER I	BRANCH CHIEF	07	B	DIV OF CLASSIFICATION & INMATE RECORD
8/2/03	MCCALL JR DAVID M	AH45	PROGRAM MANAGER I	PRGM COORD II	07	B	KIRKLAND CORRECTIONAL INSTITUTION
8/2/03	JENNINGS TOSHEA L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEATH CORR INSTIT (WOMEN)
8/2/03	SULTON SHERRY D	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION
8/2/03	OCEAN WILLIE J	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	EVANS CORRECTIONAL INSTITUTION
8/2/03	PORTERFIELD KIMBERLY D	AJ18	DATA COORDINATOR II	DATA COORD II	04	A	RESOURCE & INFORMATION MGMT ADMINIST
8/2/03	GADSON GLENN E	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LIEBER CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04 SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
8/2/03	GOLLACH MIKE N	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	BROAD RIVER CORRECTIONAL INSTITUTION
8/2/03	RICE TWANDA E	JD30	CORRECTIONAL OFFICER I	CADET	03	E	TYGER RIVER CORRECTIONAL INSTITUTION
8/2/03	PINCKNEY STEPHEN T	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LIEBER CORRECTIONAL INSTITUTION
8/2/03	SWANEY DORIAN H	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	PERRY CORRECTIONAL INSTITUTION
8/2/03	EMBREY TOMMIE L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
8/2/03	VANDERHORST GEORGE J	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
8/2/03	FOWLER MICHAEL E	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	TYGER RIVER CORRECTIONAL INSTITUTION
8/17/03	BYRD JR HENRY C	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	PALMER PRE RELEASE CENTER
8/17/03	JOHNSON SYLVIA R	AJ42	INFO RESOURCE CONSULT I	COMMUNICATION SVCS COORD	05	A	RESOURCE & INFORMATION MGMT ADMINIST
8/17/03	JOHNSON SYLVIA R	BA40	COMMUNICATIONS CONSULTA	COMMUNICATION SVCS COORD	05	A	RESOURCE & INFORMATION MGMT ADMINIST
8/17/03	FAULKENBERRY OSCAR A	JD60	WARDEN II	WARDEN V	08	B	KERSHAW CORRECTIONAL INSTITUTION
8/17/03	WARLEY SURVERN M	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
8/17/03	CODY JR TERRY C	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TYGER RIVER CORRECTIONAL INSTITUTION
8/17/03	WATSON MICHAEL T	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	EVANS CORRECTIONAL INSTITUTION
8/17/03	PICKETT KENNETH A	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	STEVENSON CORRECTIONAL INSTITUTION
8/17/03	OLIVER WILLIE B	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	MCCORMICK CORRECTIONAL INSTITUTION
8/17/03	MARTIN JAMES D	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	EVANS CORRECTIONAL INSTITUTION
8/17/03	FOOTE JOHN W	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	COASTAL PRE RELEASE CENTER
8/17/03	CANTY FRANK	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION
8/17/03	WALKER ALFONZIA	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	BROAD RIVER CORRECTIONAL INSTITUTION
8/17/03	DOUGHTY DERRICK K	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
8/17/03	JAMES TONYA T	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION
8/17/03	GARRETT STEPHANIE L	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON CORRECTIONAL INSTITUTION
8/17/03	FALLIN ROBERT E	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
8/17/03	COLE TODD S	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	WATEREE RIVER CORRECTIONAL INSTITUTION
8/17/03	LADSON VENETIA	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
8/17/03	JOHNSON SHERRIE M	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	KIRKLAND CORRECTIONAL INSTITUTION
8/17/03	SCOTT CRAIG B	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	BROAD RIVER CORRECTIONAL INSTITUTION
8/17/03	JONES TAMIKA D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION
8/17/03	WILLIAMS ELBERT M	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
9/2/03	CLAWSON PANSY M	KB20	FOOD SERVICE SPEC IV	FOOD SVC SPEC IV	04	C	NORTHSIDE CORRECTIONAL INSTITUTION
9/2/03	STUKES SHARON L	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	GOODMAN CORRECTIONAL INSTITUTION
9/2/03	BAKER JACQUELINE	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON CORRECTIONAL INSTITUTION
9/2/03	SMITH GLEN E	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	NORTHSIDE CORRECTIONAL INSTITUTION
9/2/03	ANDERS JEFFREY	JD50	CORRECTIONAL OFFICER IV	CAPTAIN II	06	A	NORTHSIDE CORRECTIONAL INSTITUTION
9/2/03	PAYTON DAVIS SYDETRA Q	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LEATH CORR INSTIT (WOMEN)
9/2/03	MIDDLETON PATRICIA A	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	COASTAL PRE RELEASE CENTER
9/2/03	MCGEE TROY L	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	WATEREE RIVER CORRECTIONAL INSTITUTION
9/2/03	PETERSON GERALD A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK CORRECTIONAL INSTITUTION
9/2/03	TURNER KELLY DEBBIE L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
9/2/03	COX SUSAN E	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	LIVESAY PRE RELEASE CENTER
9/2/03	THOMAS VALERIE D	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	TRENTON CORRECTIONAL INSTITUTION
9/2/03	DANIELS LORENZO	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK CORRECTIONAL INSTITUTION
9/2/03	CRIBB RONNIE L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER CORRECTIONAL INSTITUTION
9/2/03	LONG CHRISTINE E	AH30	PROGRAM ASSISTANT	CASEWORKER I	04	C	COASTAL PRE RELEASE CENTER
9/2/03	MITCHELL KASANDRA Y	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK CORRECTIONAL INSTITUTION
9/2/03	TRACY WYMAN C	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	NORTHSIDE CORRECTIONAL INSTITUTION
9/2/03	PITTMAN JR RICHARD W	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION
9/2/03	JEFFERSON FRANKLIN	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	LIEBER CORRECTIONAL INSTITUTION
9/2/03	DAVIS CHOLIA P	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KERSHAW CORRECTIONAL INSTITUTION
9/2/03	RICE GEOFFREY	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	MCCORMICK CORRECTIONAL INSTITUTION
9/2/03	BRYANT JR CURTIS L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
9/2/03	VARNADOE DATHAN B	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	RIDGELAND CORR INSTITUTION
9/2/03	MCGHEE DARRYL O	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
9/2/03	MANIGAULT SR GARY R	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
9/2/03	EDWARDS DONALD E	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	SECURITY
9/2/03	WALKER DEBORAH A	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	TRENTON CORRECTIONAL INSTITUTION
9/2/03	BUTLER DEBRA S	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	KIRKLAND CORRECTIONAL INSTITUTION
9/2/03	JACKSON LARRY H	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WALDEN CORRECTIONAL INSTITUTION
9/2/03	RIVERA AWILDA D	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	MANNING CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

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EFF	EMPLOYEE	JOB	STATE	INTERNAL	N	E	
DATE	NAME	CLASS	TITLE	TITLE	D	L	LOCATION
9/2/03	HAWKINS DEBORAH D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
9/2/03	BROWN CYBILL R	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	TRENTON CORRECTIONAL INSTITUTION
9/2/03	DUNLAP ULYSSES	JD50	CORRECTIONAL OFFICER IV	CAPTAIN II	06	A	NORTHSIDE CORRECTIONAL INSTITUTION
9/2/03	OGUNSILE MATTHEW I	JD50	CORRECTIONAL OFFICER IV	CAPTAIN II	06	A	LIVESAY PRE RELEASE CENTER
9/2/03	JONES WILLIE G	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	STEVENSON CORRECTIONAL INSTITUTION
9/2/03	MILLER CONNIE A	AA75	ADMINISTRATIVE ASSISTANT	INMATE GRIEV COORD	04	D	TRENTON CORRECTIONAL INSTITUTION
9/2/03	TILLMAN III ROBERT	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
9/2/03	RICE SR JERRY E	JD50	CORRECTIONAL OFFICER IV	CAPTAIN II	06	A	LIVESAY PRE RELEASE CENTER
9/2/03	SHEEDY VICTORIA H	JD35	CORRECTIONAL OFFICER II	COMPLIANCE SERGEANT	04	D	LIEBER CORRECTIONAL INSTITUTION
9/2/03	SLADE VALDA D	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	LIVESAY PRE RELEASE CENTER
9/2/03	BOYD RUTH A	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	BROAD RIVER CORRECTIONAL INSTITUTION
9/2/03	TARPLEY WANDA D	AH50	PROGRAM MANAGER II	MGR INSTITUTIONAL SVCS	08	D	DIVISION OF PROGRAMS & SERVICES
9/2/03	SALLEY COREY J	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	CAMPBELL PRE RELEASE CENTER
9/2/03	FAIR ALLEN R	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WALDEN CORRECTIONAL INSTITUTION
9/17/03	CHAPLIN SHERELL T	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	WATEREE RIVER CORRECTIONAL INSTITUTION
9/17/03	BRUNSON SADORI N	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	TURBEVILLE CORRECTIONAL INSTITUTION
9/17/03	PAYTON DAVIS SYDETRA Q	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	CAMILLE GRAHAM CORRECTIONAL INST
9/17/03	BERRY DALLAS R	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
9/17/03	MCLEOD SUSAN C	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TURBEVILLE CORRECTIONAL INSTITUTION
9/17/03	BARWICK MARK W	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	TURBEVILLE CORRECTIONAL INSTITUTION
9/17/03	RICHE LOTUS V	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	TRENTON CORRECTIONAL INSTITUTION
9/17/03	COPELAND JOHN T	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
9/17/03	BOWEN JERRY J	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
9/17/03	MARTIN DAVID B	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	COASTAL PRE RELEASE CENTER
9/17/03	WILSON TEAIDAH C	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WALDEN CORRECTIONAL INSTITUTION
9/17/03	ANDERSON MARK A	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	MANNING CORRECTIONAL INSTITUTION
9/17/03	CRAVEN BRIAN K	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TYGER RIVER CORRECTIONAL INSTITUTION
9/17/03	BOGDANY JOHN K	KA30	BUILDING/GROUNDS MGR	BUILDING/GROUNDS MGR	06	A	BROAD RIVER CORRECTIONAL INSTITUTION
9/17/03	VILANOVA JORGE L	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	SECURITY
9/17/03	JONES JEREMY E	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	PERRY CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	GRADE	BAND	LOCATION
9/17/03	WILLAMS ANGELA E	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	INMATE SERVICES
9/17/03	POTEATE CLIFTON D	JD30	CORRECTIONAL OFFICER I	CADET	03	C	KERSHAW CORRECTIONAL INSTITUTION
9/17/03	LEE TONITA S	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	EVANS CORRECTIONAL INSTITUTION
9/17/03	THOMAS SILVIA D	KB15	FOOD SVC SPECIALIST III	FOOD SVC SPEC III	03	E	KERSHAW CORRECTIONAL INSTITUTION
9/17/03	SPANN DWAYNE D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	WATEREE RIVER CORRECTIONAL INSTITUTION
9/17/03	NELSON JR CHARLES D	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	EVANS CORRECTIONAL INSTITUTION
10/2/03	SMITH DENNIS O	GA50	HUMAN SERVICES COORD I	CLIN CORR COUNS IV	05	D	STEVENSON CORRECTIONAL INSTITUTION
10/2/03	FLOWERS JUDITH W	EA20	REGISTERED NURSE I	STAFF NURSE	05	A	TURBEVILLE CORRECTIONAL INSTITUTION
10/2/03	FLOWERS JUDITH W	EA20	REGISTERED NURSE I	STAFF NURSE	05	A	LEE CORRECTIONAL INSTITUTION
10/2/03	KILLIAN JOHN T	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WALDEN CORRECTIONAL INSTITUTION
10/2/03	BEDDINGFIELD DAVID P	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
10/2/03	DUBOSE JOHNNY F	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE CORRECTIONAL INSTITUTION
10/2/03	MILLER JON F	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	COASTAL PRE RELEASE CENTER
10/2/03	VISINTAINER LEON A	AH15	ADMINISTRATIVE COORD II	BUSINESS MGR III	06	D	MCCORMICK CORRECTIONAL INSTITUTION
10/2/03	STEVENSON III ROBERT M	JD55	WARDEN I	ASSOC WARDEN	07	B	KIRKLAND CORRECTIONAL INSTITUTION
10/2/03	RIVERS IVAN T	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	EVANS CORRECTIONAL INSTITUTION
10/2/03	SAPP MELISSA L	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	BROAD RIVER CORRECTIONAL INSTITUTION
10/2/03	THOMAS VICTOR R	GC30	CHAPLAIN III	CLIN CHAPLAIN III	06	A	TRENTON CORRECTIONAL INSTITUTION
10/2/03	LAWS VIVIAN J	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE CORRECTIONAL INSTITUTION
10/2/03	DAVIS JOHN E	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE CORRECTIONAL INSTITUTION
10/2/03	AKINS CYNTHIA Y	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	KIRKLAND CORRECTIONAL INSTITUTION
10/2/03	ANDERSON MATTHEW R	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
10/2/03	SIMMONS CANDACE M	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	STEVENSON CORRECTIONAL INSTITUTION
10/2/03	BOYAN ALFRED	JD35	CORRECTIONAL OFFICER II	LIEUTENANT I	04	E	MANNING CORRECTIONAL INSTITUTION
10/2/03	EDENS ROBERT M	AH30	PROGRAM ASSISTANT	INDUSTRIES SUPV II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION
10/2/03	WOFFARD JOEANN	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	LEATH CORR INSTIT (WOMEN)
10/2/03	PAGE SONYA M	AH10	ADMINISTRATIVE COORD I	ADMIN ASST II	05	A	DIVISION OF OPERATIONS
10/2/03	REED RODNEY R	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	STEVENSON CORRECTIONAL INSTITUTION
10/2/03	RILEY TIMOTHY	JD55	WARDEN I	R & E CENTER MGR	07	B	KIRKLAND CORRECTIONAL INSTITUTION
10/2/03	FISHER JR JIMMY L	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	TYGER RIVER CORRECTIONAL INSTITUTION

RESPONSE TO QUESTION # 4 LIST OF ALL RECLASSIFICATIONS PROMOTIONS DEMOTIONS REASSIGNMENTS AND TRANSFERS WITH EFF DATE OF 1/2/02 THROUGH 12/17/04
SORTED BY EFF DATE

EFF DATE	EMPLOYEE NAME	JOB CLASS	STATE TITLE	INTERNAL TITLE	BAND	LEVEL	LOCATION
10/2/03	YORK PATRICIA A	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LEE CORRECTIONAL INSTITUTION
10/2/03	MARSHALL STEPHANIE R	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MCCORMICK CORRECTIONAL INSTITUTION
10/2/03	HANCOCK MARTHA M	JD35	CORRECTIONAL OFFICER II	CORPORAL I	04	A	CAMPBELL PRE RELEASE CENTER
10/2/03	SCOTT JACQUELINE	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TURBEVILLE CORRECTIONAL INSTITUTION
10/2/03	NEWTON JEFFREY D	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	KIRKLAND CORRECTIONAL INSTITUTION
10/2/03	MOORE REBECCA F	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	EVANS CORRECTIONAL INSTITUTION
10/2/03	HURLEY QUEEN E	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	LEATH CORR INSTIT (WOMEN)
10/2/03	ALTMAN LEROY B	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	PERRY CORRECTIONAL INSTITUTION
10/2/03	FLOYD AMORET	EA10	LICENSED PRACTICAL NURSE	LPN	03	C	LEE CORRECTIONAL INSTITUTION
10/2/03	FLOYD AMORET	EA10	LICENSED PRACTICAL NURSE	LPN	03	C	TURBEVILLE CORRECTIONAL INSTITUTION
10/2/03	SMITH BERNARD C	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MCCORMICK CORRECTIONAL INSTITUTION
10/2/03	RHAMES PATRICIA S	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	TURBEVILLE CORRECTIONAL INSTITUTION
10/2/03	MACON MINNIE F	AJ18	DATA COORDINATOR II	DATA COORD III	04	D	BROAD RIVER CORRECTIONAL INSTITUTION
10/2/03	YANTEK STEVEN R	JD30	CORRECTIONAL OFFICER I	OFFICER II	03	E	STEVENSON CORRECTIONAL INSTITUTION
10/17/03	CLAWSON PANSY M	KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC IV	05	B	NORTHSIDE CORRECTIONAL INSTITUTION
10/17/03	ROWE ERNEST E	AH30	PROGRAM ASSISTANT	CASEWORKER I	04	C	BROAD RIVER CORRECTIONAL INSTITUTION
10/17/03	TENNIS NANCY J	KB25	FOOD SERVICE SPECIALIST V	FOOD SVC SPEC V	05	B	LIEBER CORRECTIONAL INSTITUTION
10/17/03	GRAHAM JUDITH M	BH10	RECORDS ANALYST I	MED RECORDS SPEC	03	C	LIEBER CORRECTIONAL INSTITUTION
10/17/03	ESTES DEBRA A	ED40	LABORATORY TECHNOLOGIST I	LAB TECH II	05	E	KIRKLAND CORRECTIONAL INSTITUTION
10/17/03	CLINTON PIERRE D	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	WALDEN CORRECTIONAL INSTITUTION
10/17/03	SKIPPER JR EUGENE D	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	LIEBER CORRECTIONAL INSTITUTION
10/17/03	WHITE REGINALD L	JD40	CORRECTIONAL OFFICER III	LIEUTENANT II	05	B	RIDGELAND CORR INSTITUTION
10/17/03	FELDER DENNIS THELMA	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	INMATE BUS TERMINAL
10/17/03	QUINN DENNIS J	JD30	CORRECTIONAL OFFICER I	OFFICER I	03	E	STEVENSON CORRECTIONAL INSTITUTION
10/17/03	CURETON TONYA R	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	PERRY CORRECTIONAL INSTITUTION
10/17/03	SUMMERS JEROME A	JD30	CORRECTIONAL OFFICER I	CADET	03	C	KIRKLAND CORRECTIONAL INSTITUTION
10/17/03	JONES ROBERT J	JD35	CORRECTIONAL OFFICER II	SERGEANT I	04	B	TRENTON CORRECTIONAL INSTITUTION
10/17/03	LIPSCOMB TYRONE L	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	A	WATEREE RIVER CORRECTIONAL INSTITUTION
10/17/03	GIBSON DEBRA J	JD35	CORRECTIONAL OFFICER II	SERGEANT II	04	D	MCCORMICK CORRECTIONAL INSTITUTION
10/17/03	KEA JR CHARLIE J	JD35	CORRECTIONAL OFFICER II	CORPORAL II	04	B	INMATE BUS TERMINAL