

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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Appeal from the Administrative Law Court
S. Phillip Lenski, Administrative Law Judge
ALC Case No. 15-ALJ-04-0567-AP

Opinion No. 2017-UP-209 (S.C. Ct. App. filed 5/17/2017)
Appellate Case No. 2017-001525

S.C. SUPREME COURT

JOSE ALBERTO MALDONADO, #312648, Pro - Se,

PETITIONER,

v.

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS,

RESPONDENT.

REPLY MOTION FOR
RETURN TO PETITION FOR WRIT OF CERTIORARI

South Carolina Department
Of Corrections

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Petitioner, Pro - Se,

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STATEMENT OF THE ARGUMENT PRESENTED

The Court of Appeals Improperly Affirm the decision of the Administrative Law Court's Order where the Administrative Law Court order contained a clear error of law, by founded that Petitioner's criminal charges to a "second offences" should be calculated by does a "statute" he never plead to nor "indictment" of South Carolina Code Ann. § 44-53-375(C)(2)(b).

STATEMENT OF THE CASE

This matter comes before the Court pursuant to the Appeal of Jose Alberto Maldonado, an Inmate in the custody of South Carolina Dep't of Corrections. On Dec. 11, 2014 Petitioner submitted a Step One Grievance, "complaining about of demanded disclosed" with the (ALC) by ordered an evidentiary hearing. When him argued that his ("unlawful 'consecutively sentences'"), the Step One, (IGP) has been denied without any proof to the Inmmate Records Plan, under (SCDC's Policy Op-21.09 ¶[2]). On January 9, 2015, Petitioner submitted a Step Two Griavance form, which was also is denied, on the grounds that (ALC) didn't finded any errors with both statutes, were the complaint arguments is subject to both (IGP) Grievences form. Petitioner filed his Notice of Appeal, On October 19-20, 2015, with the (ALC), During the pendency of the appeal in the (ALC), Petitioner filed an Notice of Intent To File Writ of Mandamus, Summon, & Writ of Mandamus, on Jan. 6, 2016, in the South Carolina Court of Appeals which was dismissed on February 10, 2016 and remitt-et on February 29, 2016. Thereupon, the appeal in the (ALC) went forward, and on May 20, 2016, The (ALJ) Phillip Lenski issued an order affirming the decision of the (SCDOC). Petitioner argues that sentences is unlawfully.

Petitioner appealed to the S.C. Court of Appeals, and on May 17, 2017, the Court of Appeals issued an unpublished opinion affirming the decision of the (ALC) without an evidentiary hearing to compel the (IGP). Petitioner then submitted a Petition for Rehearing, which was denied by order dated June 23, 2017, Petitioner submitted a Petition for a Writ of Certiorari dated July 11, 2017, Now Entered The Rule 242(a)(b)(c), & (g), SCACR. And this Reply Motion Follows:

ARGUMENT

The Court of Appeals Improperly Affirm the decision of the Administrative Law Court's Order Where the Administrative Law Court order contained a clear error of law, by founded that Petitioner's criminal charges to s "second offences" should be calculated by does a "statute" he never plead to nor "indictment" of South Code of Laws Ann. § 44-53-375(C)(2)(b)?

The jurisdiction of the Administrative Law Court ("ALC"), decline to hear Petitioner his Notice of Appeal by a Step (1) Grievance, and Step (2) Grievances. The Petitioner complained that (SCDC) disclosed under the Inmate Records Plan's Policy, Op-21.09 with an evidentiary hearing. Was derived from the decision of the Court in Al-Shabazz v. State, 338 S.C. 354, 527, S.E.2d 742 (2000). Respondent's Argument stated in Sullivan v. South Carolina Dep't of Corrections, 355 S.C.437, 586 S.E.2d 124 (2003), Petitioner reply that, the "argument from Respondent in Sullivan, is unclear because, the Petitioner have not records to the Court of Appeals to this court make specific finding of facts and conclusion of law as to this Honorable Supreme Court rejected Respondent's argument in Sullivant." However, in specific finding this Court in Sullivan v. South Carolina Dep't of Corrections, 355 S.C. 437, at, 441, 586 S.E.2d 124, at, 125. In Affirming, as modified, the ALC's en banc decision of McNeil v. S.C. Dep't of Corrections, 02-ALJ-04-00336-AP (Sept. 5, 2001). This Court denied Sullivant's grievance.

Therefore, Petitioner shown under Sullivant's decision, the Petition against the "ALC Order, when this action's under the Petitioner "second offences," and for that's "a clear error of the ALC decision." To no been granted an evidentiary hearing, before the ALC ruled the(IGP). Petitioner's criminal charges for a second offences, and failed to

no clarify the S.C. Code Ann. § 44-53-375(C)(5), and avoid the ALC confused at Section 44-53-375(C)(2)(b), That ALCJ, denied Petitioner's Notice of Appeal, without an evidentiary hearing, because the (ROA)'s facts showing that "Petitioner does never plead to nor "indictment for a second offences" pursuant of S.C. Code Ann. § 44-53-375(C)(2)(b)(Supp. 2005) et seq.

The Administrative Law Court Judge ("ALCJ") fall below "to Lacked Subject Matter Jurisdiction" by review the "Inmate Record Plan's Policy Op-21-09 ¶[2.1 through ¶ 2.18] at section Kirklan. See, Petitioner's Petition For Writ of Certiorary at (p. 4, & 5) and (ROP: Appx. A. p.3) ALC's ruling order's the Petitioner was sentenced to § 44-53-375(C)(2)(b). See, Sullivan, at 441, 586 S.E . 2d at 125.

Further, Petitioner asking to this Hon: Court to see the Sullivan's decision order, when this court dismissed the appeal, and was issued. Because "the Circuit Court's Order found that [Sullivan] does not challenge the calculation of his sentence - related credits, ("custody status")," See id., the hold (ROP) at, the wrong information Petitioner's sentenced of Indictments 2005-GS-47-26 Section 44-53-375(C)(5). The ALC, ignore the law, and that matter of (SCDOC) have no jurisdiction to Petitioner's indictments at § 44-53-375(C)(5), neither for the second offences at Section 44-53-375(C)(2)(b), and for that require reversed and remanding the case to the general sessions court term at the Greenville County Thirteenth Judicial Circuit, nor is [Petitioner] the object of punishment in major deciplinary hearing, that the ALC did not have jurisdiction? Pruitt v. State, 274, S.C. 656, 266 S. E.2d 779, at, 780 (1980) S.C. Code Ann. § 24-3-710, see also, the

Petitioner's Petition for Writ of Certiorari, (p. 4) That, Policy Op-21.09 ¶[2] The ALC's error to ruling the Petitioner have been for second offence under § 44-53-375(C)(b)(2) and failed to review the "evidence;Petitioner had been submitted to the ALC, see at Petitioner (ROP: Appx:C p.(63)) the "APPELLANT BRIEF/MOTION FOR LEAVE TO CONDUCT DISCOVERY" see (ROP: Appx. C. p. (65)'s Attachment: "B", instead (ROP: Appx. C p. 87, through 104)." See id., at 441, 586 S.E.2d at 125. (Emphasis added) (quoting Al-Shabazz).

Sullivan argues that the ALC erred in refusing to review the SCDC's denial of his grievance, and in turn, that the circuit court erred in affirming the ALC's decision. Hereby This Honorable Court have to ruling the Petitioner (ROP's fact and him no possess any record under the S.C. Code Ann. § 44-53-375(C)(2)(b). Holding the followings; in Al-Shabazz v. State, stated as follows:

[A] inmate may ... seek review of [the SCDC's] final decision in an administrative manner under the [Administrative Procedure Act ("APA")] . Placing review of these cases within the ambit of the APA will ensure that an inmate receives due process, which consists of notice, a hearing, and judicial review.

338 S.C. 354, 369, 527 S.E.2d 742, 750 (2000). In Al-Shabazz, the Court recognized that the administrative matters entitled to review by the ALC "typically arise in two ways: (1) when an inmate is disciplined and punishment is imposed and (2) when an "inmate believes prison officials have erroneously calculated his sentence," "sentence-related credits, or 'custody status'" see id., at 369. 527 S.E.2d at, 750. The Court clearly explained further that procedural due process was guaranteed only when an inmate was deprived of an interest encompassed by the Fourteenth Amendment's protection of liberty and property. Id. at, 442, 527 S.E.2d 742, at, 750 (2000).

Petitioner argues his IGP case, that Court of Appeals improperly failed to affirm the Petitioner's IGP case, to the ALC's order and the determination of the (SCDC). See "Return To Petition for Writ of Certiorari" The Respondent's argument (R. p.3) at her "First" allegations, her defense is to the ALC' that properly allowed the

"Department additional time to file its Brief." This Hon: Court have to reject her argument, when Respondent failed to timely filed his "Respondent's Brief", to the ALC. and his respond run out of time at the "Initial Brief". Thus, the Petitioner submitted a "Motion for Summary Judgment, against Respondent's limitation action. See at (ROP: Appx. B. p.(27, through 37)) with an (attached: Affidavit) on (ROP: Appex. B, p. 38-39) see id., the ALC, addressed the Petitioner, is "MEMORANDUM Form, to filed his "Appellant Brief", was issued on Dec. 3, 2015, was ALC sended a ORDER DENYING MOTION FOR DISCOVERY, See (ROP: Appx.C p. (108)), but the ALC not ruling the Appellant Brief' and for that Respondent against limitation action to respond Appellant Brief. See (ROP: Appx. C, p,60 at Memmorandum 60 Briefs. A. "Time for Filing Brief" both parties have the same time limitation to files its Brief. Within eighty-five (85) days after the date of assigment, the respondent shall file an original brief in responded. Ms. Christina Catoe Bigelow, Sended a letter to the Clerk of Appeals on August 8, 2016, were she said in her writen letter that inform the "Court of Appeals that general counsel from (SCDC) David M. Tatarsky, Esquire, is no longer employed with the (SCDOC). And asked the Court of appeal to remove Mr. Tatarsky as counsel or record in this case. and also she asked as counsel of record instead. Christina C. Bigelow, on August 12, 2016 the Court of Appeals grant her, letter from August 8, 2016. and David M. Tatarsky has been removed as counsel of record for respondent. See (Attachments: A-1, & A-2) in this matter. This, Hon: Supreme Court have to denying Repondent's shorten the time she said under SCALC, Rule 3(B)("because is no good cause to shown, the [ALC] See, her Argument (R. p, 3) Argues Petitioner's (ROA,p. 1 - 2; Appx. "Attachment A-2) second page of Court of Appeals' unpublished opinion). Now Christina C. Bigelow, prosecuting the IGP case. Without showing the "Inmate Records at Kirklan Section, and her using Petitioner his own record, and failed to answer IGP arguments by

the Petitioner's Summary Judgment, and objection to Respondent Motion To Filed Out Of Time." See (ROA Appx. A p, 8). See McNeil v. South Carolina Dep't of Corr. 404 S.C. 187, at 191, 743 S.E.2d 843, at 847 (2013) under the "public policy exception" ("[t]he public policy exception clearly applic in cases where either (1) the employer requires the employee to violate the law, or (2) the reason for the employee's termination itself is a violation of criminal law")(Citing, Barron v. Labor Finders of, 393 S.C. 609 at 617, 713 S.E.2d 634, at 638 (2011); see also Ludwick v. This Minute of South Carolina Inc., 287 S.C. 219, 337 S.E. 2d 213, at, 216 (1985)"). The Respondent, do not have merits under the SCALC Rule 3(B) to raise a shorten time, the limitation action was is ("eighty-five, days" And 15-days delated) Tatarsky leaved to her before the Court of Appeals, granted her latter by Mr. Tatarsky had been removed). See (ROP: Appx. A, p.12) (lines 1 - 9). The Court of Appeals, failed to ruled out of time "Appellant's Reply Brief To Respondent Brief" was there is not a shorten time, by the "eighty five (85) days, see the ALC Memorandum V. SPECIAL APPEALS 60 Briefs A SCALC Rules to respond the Appellant's Initial Brief. The ALC denied Appellant's Motion For Conduct Discovery" but didn't ruled the "Appellant Brief" was is the same Motion of Appellant Brief/Motion For Leave To Conduct Discovery" See (ROA Appx. C. p, 63) Pursuan to Rule 21 SCALC, DiscoverY, § 1-23-320 against the Respondent for failure to respond within the Initial Brief, before the ALC, denied the "MOTION FOR LEAVE TO CONDUCT DISCOVERY" on December 18, 2015. Was therein is not a shorten time by the ALC's denied and ruled it. See (ROP: Appx.C p, 63, and at, p, 108 - 109). See Id.

See, the Respondent's "second issue argument," argued the ALC, properly conclude that it did not have jurisdiction to review the underlying "validity of Petitioner's sentences." And (Citing, Jernigan v. State, 340 S.C. 256, 259-60, 531 S.E.2d 507-508, 509 (2000). The Respondent agree to see the Petitioner's sentences

did not maching with the Section 44-53-375(C)(2)(b) at his argum-
ent and asked to the Supreme Court in her Return To Petition For
Writ of Certiorari, that Petitioner have to submitted an (post-
conviction relief is a proper avenue of relief when the defendat
wishes to attack the validity of his underlying conviction or se-
ntence). Hereby Respondent, knowing that, and argued it:See, (ROP:
Appx. A p, 1, and , p, "3") the ALC's Order, showing that Petitioner against
"false imprison" by the wrong "custody-statute" in the South Carolina Departm-
ent of Corrections, Respondent holding that and her second issue argument (R.p
, 4) see also (ROP: Appx. C p, 69, & Appx. C p, 72). That, the Petitioner alr-
eady challenging that, him have pending "Motions under the Rule of Civ. Proc.,
Rule 60(b)(4)(5). And there is a ("Post-Conviction Relief Action Application")
Case No. 2015-CP-23-04747's ("4th PCR. Act"). See: State v. Gulledded, at 220,
487 S.E.2d 594. (Citing, William v. New York, 337 U.S. 214 (1949)("constructi-
ve contem"). That, Petitioner's "Post-Conviction Relief Action, Application in
the Greenville County, is already denied, but Petitioner submitted his Rule 59
(e) SCRCF, against the attorney general's office with his wrong filed case No.
2015-CP-23-04757, at his Final Order of Dismissal, when Petitioner introduced,
information to the ALC judge that him have a pending (4th PCR. Action) within,
the attorney general's office. See (ROP: Appx. C. p, 72) is evidence that ALC
had/or have in my (ROP). Respondent is claim have been igned my (4th Post -
Conviction Relief Action) and argued it under Jernigan v. State, 340, S.C.256,
531 S.E.2d 507, at 508. See (quoting, Al-Shabazz v. State, 338 S.C. 354, Fn.1,
at, 567, 527 S.E.2d 742, at 749 (2000) The Al-Shabazz court held that "PCR's a
proper avenue of Relief only when the applicant mounts a collateral attack ch-
allenging the validity of his conviction or sentence as authorized by Section,
17-27-20(a)" See id., Al-Shabazz, 567, Fn.1, 527 S.E.2d at 749. Reading imper-

inent Part:

The Al-Shabazz, Court note that the two non-collateral were exceptions to this general rule. See S.C. Code Ann. § 17-27-20(a)(5)(Supp. 1998)("PCR claims are allowed where applicant alleges that his sentence has "expired" or his probation, parole or "conditional release has been unlawfully". Id. at, Fn.1, 567, 527 S.E.2d 742, at, 749 (2000).")

This Hon: Supreme Court have to make an Order to the South Carolina Department of Corrections that Petitioner have to remand his legal sentence in the Greenville County Thirteen Judicial Circuit's general sessions court term, and give him the opportunity to present his ("IGP") claims, within the (Post - Conviction Relief Application, Case No. 2015-CP-23-04747), against the Respondent's 'argument' (R. p. 4) at the Return To Petition for Writ of Certiorari. File on August 10, 2017 argue that "underlying validity of Petitioner's sentence," because, Respondent's "argument" is substantial under § 17-27-20(a)(5). and facts against Petitioner's "conditional release has been unlawfully". Further, Petitioner pray for this Honorable Supreme Court to hold a hearing to his early (4th PCR Act. Application), and his Motion of Rule 59(e) SCRCP, filed on August 1, 2017. "Against the attorney general office his introduction to "a wrong PCR case No. 2015-CP-23-04757" with his **FINAL ORDER OF DISMISSAL.**"

Petitioner's unlawfull, with the (SCDC) inside Kershaw CI. and this Hon: Court have to vacate, and reverse the ALC's order and fix a conditional release, in the matter that Petitioner have been unlawfully with the (SCDC) Division, pursuant to the Policy OP-21.09 ¶[2.1, through ¶ 2.18], and the Respondent failed to produced evidence, and this Court ruling that SCDC Divicion release him to the "Thirteen Judicial Circuit its Courts, Generals Sessi-ns, and the Common Pleas Court, by a legal remanding the case, in the right way of validity indictments, when Respondent argued th- at on his argument "Third", was her raise that Petitioner now fa- ce ("two (2)") times ("Twenty (20) Years") sentences? Petitioner, Reply to this invalidity, factual argument by Respondent, for Tr-

afflicting in Methamphetamines 28-100 grams, second offense's seven (7) years no more than thirty (30) years. Under indictment that Petitioner never plead guilty, to nor "indictment" pursuant to § 44-53-375(C)(2)(b) but the "attorney general office's" mistaken by the introduced the Case No. 2005-GS-47-26, counts I, and IV. without the state grand jury's vote a true bill, and that shown, a this Court the violation of § 44-53-375(C)(2)(b). See (ROP: Appx.C p, 84) information from the "State Grand Jury" had been release that Petitioner do not have records to holding in the (SCDC) between the "attorney general office." On April 17, 2015, this "Office stated that: The Clerk of Court State Grand Jury, said the Petitioner "did not have record of said charge, and also 'remarked-again that him, has no record of a "State Grand Jury" case regarding this matter, case No. 2005-GS-47-26." Setting outside, the factual finding by Respondent's Return To Petition for Writ of Certiorari, should be deny, and Granting Petitioner's Petition for Writ of Certiorari. Behind the Petitioner's Reply Motion For Return to Petition for Writ of Certiorari.

Rather the, section 44-53-375(C)(5) inside of Case 2005-GS-47-26, to the ("ROP") should be reverse under the invalid Petitioner's second offences would be under the valid Section 44-53-375(C)(2)(b). Within the State Grand Jury jurisdiction, because Petitioner now is held in "custody status, that his 'conditional release have been -unlawfully'" with the South Carolina Department of Corrections.

Petitioner reaching the Petition, holding that, in the case subjudice, see Pruitt v. State, 274 S.C. 656, 266 S.E.2d 779, at, 780 (1980) Pursuant to S.C. Code Ann. § 24-3-710.

However, when the infringenments complained of by an inmate subject to prison disciplinary action reach Constitutional dimen-

sions, the "Courts are duty bound to intercede." See Pruitt, 266 S .C. at 780. (Citing, Wolff v. McDonnell, 418 U.S. 539, 94 S.Ct. 2963 41 L.Ed.2d 935 (1974) and (same) Sweet v. South Carolina Dep't of Corrections, 529 F.2d 854 (4th Cir. 1975). The Petitioner's Case 2005-GS-47-26 indictments' in section 44-53-375(C)(5) for a first offenced inside should be reverse and remanding to the lower court in Greenville County.

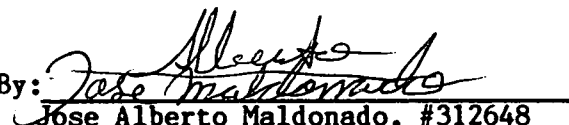
CONCLUSION

Petitioner prays to this Honorable Court, that for foreg-
oin reason to charaterize the statute of Section, 44-53-375(C)(2)
(b). Was Actually the Court of Appeals its ruling would be prope-
rly, but Petitioner did not possess any indictment for a second
offences with the state grand jury's power, to passed a true bill
and there inside shown, that sentenced from April 10, 2007 didn't
have been applied to Petitioner. Therefore, is clear to the State
and the (SCDC), miscalculate the Section for a second offence un-
der § 44-53-375(C)(2)(b). And this Honorable Supreme Court, will
should be reverse.

Respectfully Submitted

Done this 21th day of August, 2017.

By:



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File on: AUG 23 2017

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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S. Phillip Lenski, Administrative Law Judge
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JOSE ALBERTO MALDONADO, #312648, Pro - Se,
PETITIONER,
V.
SOUTH CAROLINA DEPARTMENT OF CORRECTIONS,
RESPONDENT,

CERTIFICATE OF SERVICE

Undersigned PETITIONER Pro - Se hereby certifies on today's date him mailed a copy of the Reply Motion For Return to Petition for Writ of Certiorari, And ("Two")(Attachments: A-1, & A-2) to Respondent, addressed as follows: Christina Catoe Bigelow, (SCDC) P.O. Box. 21787 Columbia, South Carolina 29221. And The File Original To:

THE SUPREME COURT OF SOUTH CAROLINA
Honorable Daniel E. Shearouse
Clerk of Court
Post Office Box 11330
Columbia, South Carolina 29211

Authority of: Rules, 211(b), 240(C)(1), & 242(a)
(SCACR)

File on: AUG 23 2017
Respectfully Submitted

Further, Petitioner said and Certify:

This 21 day August, 2017.

SWORN TO and SUBSCRIBED Before Me
This 21st day of August, 2017

Christina A. Amos
Notary Public For South Carolina

My Commission Expires: _____
December 23, 2018

By: Jose Maldonado
Jose Alberto Maldonado, #312648
Petitioner, Pro - Se,

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