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THE STATE OF SOUTH CAROLINA
In the Supreme Court

OCT 02 2018

S.C. SUPREME COURT

APPEAL FROM CLARENDON COUNTY
Court of Common Pleas

RECEIVED

R. Ferrell Cöthran, Jr., Circuit Court Judge

OCT 01 2018

SC Court of Appeals

Appellate Case No. 2018-001520

Bucky Mock,

Respondent-Appellant,

v.

Clarendon County Board of Voter Registration &
Elections, Clarendon County Democratic Party,
LaNette Samuels-Cooper, South Carolina Democratic
Party, and South Carolina Election Commission,

Defendants,

Of whom LaNette Samuels-Cooper is Appellant-Respondent,

And Clarendon County Board of Voter Registration &
Elections, Clarendon County Democratic Party, South
Carolina Democratic Party, and South Carolina Election
Commission are Respondents.

**RESPONDENT-APPELLANT BUCKY MOCK'S
MOTION TO SUPPLEMENT THE RECORD ON APPEAL**

Pursuant to Rule 240, SCACR, Respondent-Appellant Bucky Mock hereby moves to supplement the Record on Appeal.

At the outset, the undersigned counsel are frustrated that opposing counsel refused to respond to their request to supplement the Record on Appeal with relevant documents that were omitted. By way of background, the undersigned counsel sent Samuels-Cooper's counsel at least five emails, some of which date back to September 11, 2018, requesting that they send a copy of

the Record on Appeal ahead of time to avoid the very issue being raised before the Court today. Further, the undersigned counsel tried to call several times, but an assistant indicated Samuels-Cooper's counsel was busy each time. To date, Kimberly Barr has never responded to any of these requests. Instead, the undersigned counsel received an email on September 27, 2018, the day before Final Briefs were due, advising that a copy of the Record on Appeal would be placed in the mail. Later that evening, perhaps in recognition of the hardship this placed on Mock's ability to cite the record in his Final Brief, Samuels-Cooper's counsel finally emailed a PDF copy of the Record on Appeal at 10:49 P.M. the night before briefs were due.

Although Mock was hopeful that Samuels-Cooper would not omit relevant documents from the Record on Appeal, she left out several important exhibits that were filed with the circuit court. See Rule 210(c), SCACR (contemplating the inclusion of exhibits in the Record on Appeal); Rule 10(c), SCACR (asserting that copies of any documents included as "an exhibit to a pleading [are] a part thereof for all purposes if a copy is attached to such pleading"). All of these documents are relevant to the issues raised by the parties in this cross-appeal. Without the inclusion of these documents, this Court will not be able to conduct a full review of the circuit court's decision because it will not have the benefit of reviewing all relevant document presented below. Nevertheless, notwithstanding numerous reminders that time is of the essence in this election-related appeal, Samuels-Cooper's counsel has refused to respond. Importantly, the lack of response affected Mock's ability to file his Final Brief on September 28, 2018.¹

Because Samuels-Cooper's counsel will not respond, Mock's counsel was forced to file the present motion. Mock seeks to supplement the Record on Appeal to include the following documents, copies of which are attached to this Motion, that were omitted from the initial Record

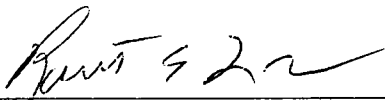
¹ Out of an abundance of caution and to avoid further delay, Mock is submitting his Final Brief today without the Record on Appeal issues resolved.

on Appeal: (1) Exhibits A–E attached to Mock’s Verified Complaint, (2) Exhibits A and B attached to Mock’s Motion for a Temporary Restraining Order, and (3) Exhibits A and B attached to Mock’s Response in Opposition to Samuels-Cooper’s Motion to Dismiss. Notably, each of these documents supports Mock’s position. No documents offered by Samuels-Cooper were omitted from the Record on Appeal.

This motion is not intended to delay this expedited appeal. As noted above, the undersigned counsel were reluctant to file this motion because they thought this was something to which the parties could easily consent and quickly remedy. Unfortunately, the lack of communication from Samuels-Cooper’s counsel forced the present situation. For the reasons set forth above, Mock respectfully requests that the Court issue an Order requiring Samuels-Cooper to file a supplemental Record on Appeal that includes the attached documents and serve all parties with a copy thereof.

Respectfully submitted,

ROBINSON GRAY STEPP & LAFFITTE, LLC

By: 

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Counsel for Respondent–Appellant Bucky Mock

EXHIBIT 1

EXHIBIT A

Statement of Intention of Candidacy & Party Pledge

This form must be filed with the appropriate election office by any candidate seeking a political party's nomination. All information on this form will be made available to the public at the time of filing. For more information, visit www.scVOTES.org/candidate-information.

Name	CHARLES J. "BUCKY" MOCK, JR	Party	Democratic
Office	Coroner	District	Clarendon
Voter Reg. #	142714276	Primary or Convention Date	06/12/2018
		Election Date	11/06/2018

Name on ballot may be any combination of a candidate's given name, derivative of the given name, or nickname. A derivative name or nickname must be used in good faith for honest purposes and may not imply professional or social status, an office, or military rank. A nickname may not exceed 15 letters.

Name on Ballot	Bucky Mock
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Name pronunciation, if necessary, for audio ballot (e.g., Jackson Gervais: jur-VAY)	
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Candidate Contact Information (address not required to be residence address)

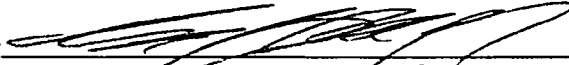
Address	1245 Striper Dr	City	Manning	Zip	29102
Phone	803-460-5439	Email	buckymock44@yahoo.com		

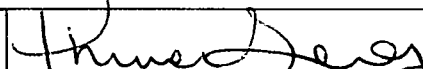
Party Pledge (Party Pledge not applicable to designees for the Office of Lieutenant Governor)

I hereby file my notice as a candidate for the nomination as Coroner Clarendon in the primary election or convention to be held on 06/12/2018. I affiliate with the Democratic Party, and I hereby pledge myself to abide by the results of the primary or convention. I shall not authorize my name to be placed on the general election ballot by petition and will not offer or campaign as a write-in candidate for this office or any other office for which the party has a nominee. I authorize the issuance of an injunction upon ex parte application by the party chairman, as provided by law, should I violate this pledge by offering or campaigning in the ensuing general election for election to this office or any other office for which a nominee has been elected in the party primary election, unless the nominee for the office has become deceased or otherwise disqualified for election in the ensuing general election.

Candidate's Oath

I hereby affirm that I meet, or will meet by the time of the general or special election, or as otherwise required by law, the qualifications for this office.

Candidate Signature  Date 03/16/2018
Candidate must sign in the presence of an Election Official or Notary Public.

Election Official Signature			
Date Received	3-16-2018	Time Received	12:13p.m.
<input type="checkbox"/> SEC <input checked="" type="checkbox"/> <u>Clarendon</u> County Board			

For use if candidate signs in presence of Notary Public

Name of Notary Public	My Commission Expires	
Signature of Notary Public	Date	

ELECTRONICALLY FILED 2018 JUN 14 5:12 PM CLARENDON COMMON PLEAS CASE#2018CP1400237

FILING AFFIDAVIT – CORONER

STATE OF SOUTH CAROLINA
County of CLARENDON

I, Charles J. "Bucky" Mock, Jr., being duly sworn, hereby state or affirm that:

1. I am offering my candidacy for the Office of Coroner via nomination by the Democratic Party .
2. As evidenced by the statements and information selected, indicated, or otherwise provided below, I meet all of the qualification requirements for Coroner set forth in S.C. Code § 17-5-130.
3. My date of birth is 06/17/1944 and my place of birth is Chicago, Illinois.
4. I am a citizen of the United States.
5. I am a resident of Clarendon County and have been a resident for 26 years.
6. I am a registered voter in Clarendon County.
7. I will have attained the age of at least twenty-one years prior to the date of election for this office.
8. I obtained a high school diploma or its recognized equivalent by the State Department of Education on the following date: May 1963.
9. I have not been convicted of a felony or an offense involving moral turpitude contrary to the laws of this State, another state, or the United States.
10. I meet at least one of the following education and/or experience requirements: *[check all that apply]*
 - I have at least three years of experience in death investigation with a law enforcement agency, coroner, or medical examiner agency.
 - I have a two-year associate degree *and* two years of experience in death investigation with a law enforcement agency, coroner, or medical examiner agency.
 - I have a four-year baccalaureate degree *and* one year of experience in death investigation with a law enforcement agency, coroner, or medical examiner agency.
 - I am a law enforcement officer, as defined by S.C. Code § 23-23-10(E)(1), who is certified by the S.C. Law Enforcement Training Council (the "Training Council") with a minimum of two years of experience.
 - I have completed a forensic science degree or certification program recognized by the S.C. Coroners Training Advisory Committee (the "Advisory Committee") *or* I am enrolled in a forensic science degree or certification program recognized by the Advisory Committee to be completed within one year of being elected coroner.
 - I am a medical doctor.
 - I have a Bachelor of Science degree in nursing.
11. The following supplemental education and experience information is provided to the extent applicable:
 - 1) I received an associate degree on the following date: May 1979.
 - 2) I received a baccalaureate degree on the following date: _____.
 - 3) I completed a forensic science degree or certification program recognized by the Advisory Committee on the following date: _____.
 - 4) I am enrolled in the following forensic science degree or certification program recognized by the Advisory Committee to be completed within one year of being elected to the office of coroner: _____.
 - 5) I have 22 years of experience as a death investigator.
 - 6) I have _____ years of experience as a law enforcement officer certified by the Training Council.


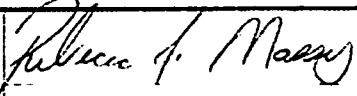
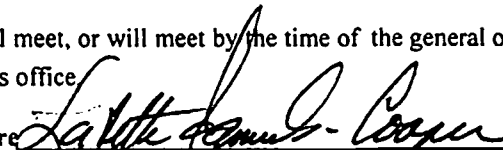
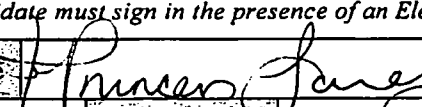
Candidate Signature		Notary Signature	
Candidate Address	<u>1245 STRIPED DR MANNING SC 29102</u>	Sworn before me on this date	<u>16th & March 2018</u>
		Commission expiration date	<u>10/24/2020</u>

EXHIBIT B

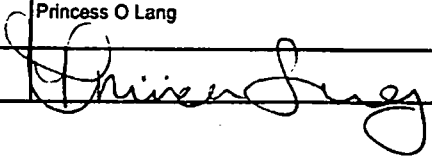
Statement of Intention of Candidacy & Party Pledge

This form must be filed with the appropriate election office by any candidate seeking a political party's nomination. All information on this form will be made available to the public at the time of filing. For more information, visit www.scVOTES.org/candidate-information.

Name	LaNette Samuels-Cooper	Party	Democratic
Office	Coroner	District	Clarendon County
Voter Reg. #	142123393	Primary or Convention Date	06/12/2018
		Election Date	11/06/2018
<i>Name on ballot may be any combination of a candidate's given name, derivative of the given name, or nickname. A derivative name or nickname must be used in good faith for honest purposes and may not imply professional or social status, an office, or military rank. A nickname may not exceed 15 letters.</i>			
Name on Ballot	LaNette Samuels-Cooper		
Name pronunciation, if necessary, for audio ballot (e.g., Jackson Gervais: jur-VAY)			
Candidate Contact Information (address not required to be residence address)			
Address	P.O. Box 15	City	Manning
		Zip	29102
Phone	803-316-3230	Email	lanettesamuels2@gmail.com
Party Pledge (Party Pledge not applicable to designees for the Office of Lieutenant Governor) I hereby file my notice as a candidate for the nomination as <u>Coroner Clarendon County</u> in the primary election or convention to be held on <u>06/12/2018</u> . I affiliate with the <u>Democratic</u> Party, and I hereby pledge myself to abide by the results of the primary or convention. I shall not authorize my name to be placed on the general election ballot by petition and will not offer or campaign as a write-in candidate for this office or any other office for which the party has a nominee. I authorize the issuance of an injunction upon ex parte application by the party chairman, as provided by law, should I violate this pledge by offering or campaigning in the ensuing general election for election to this office or any other office for which a nominee has been elected in the party primary election, unless the nominee for the office has become deceased or otherwise disqualified for election in the ensuing general election.			
Candidate's Oath I hereby affirm that I meet, or will meet by the time of the general or special election, or as otherwise required by law, the qualifications for this office.			
Candidate Signature		Date	
		<u>3/19/2018</u>	
<i>Candidate must sign in the presence of an Election Official or Notary Public.</i>			
Election Official Signature			
			
Date Received	<u>3-19-2018</u>	Time Received	<u>11:53 am</u>
		<input type="checkbox"/> SEC	<input checked="" type="checkbox"/> <u>Clarendon</u> County Board
For use if candidate signs in presence of Notary Public			
Name of Notary Public	My Commission Expires		
Signature of Notary Public	Date		

Filing Fee Receipt

Candidate Name	Lanette Samuels-Cooper		
Party	Democratic		
Office	Coroner (Unexpired Term)	District	
Election	11/6/2018, Statewide General Election (20578)		
Amount of Filing Fee	\$717.12		
Date Received	03/19/2018		
Time Received	11:53 AM		
Check Number	565		

Receiving Official	Princess O Lang		
Signature		Date	3-19-2018

The Candidate Filing Receipt is issued pursuant to S.C. Code of Laws 7-11-15(E)

FILING AFFIDAVIT - CORONER

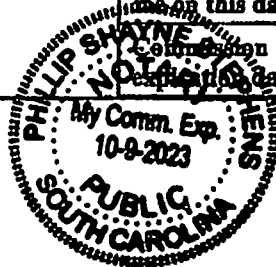
STATE OF SOUTH CAROLINA

County of Clarendon

I, LaNette Samuels-Cooper, being duly sworn, hereby state or affirm that:

1. I am offering my candidacy for the Office of Coroner via nomination by _____.
2. As evidenced by the statements and information selected, indicated, or otherwise provided below, I meet all of the qualification requirements for Coroner set forth in S.C. Code § 17-5-130.
3. My date of birth is 8/25/1948 and my place of birth is Sumter, SC.
4. I am a citizen of the United States.
5. I am a resident of Clarendon County and have been a resident for 35 years.
6. I am a registered voter in Clarendon County.
7. I will have attained the age of at least twenty-one years prior to the date of election for this office.
8. I obtained a high school diploma or its recognized equivalent by the State Department of Education on the following date: 5/31/1966.
9. I have not been convicted of a felony or an offense involving moral turpitude contrary to the laws of this State, another state, or the United States.
10. I meet at least one of the following education and/or experience requirements: *[check all that apply]*
 - I have at least three years of experience in death investigation with a law enforcement agency, coroner, or medical examiner agency.
 - I have a two-year associate degree *and* two years of experience in death investigation with a law enforcement agency, coroner, or medical examiner agency.
 - I have a four-year baccalaureate degree *and* one year of experience in death investigation with a law enforcement agency, coroner, or medical examiner agency.
 - I am a law enforcement officer, as defined by S.C. Code § 23-23-10(E)(1), who is certified by the S.C. Law Enforcement Training Council (the "Training Council") with a minimum of two years of experience.
 - I have completed a forensic science degree or certification program recognized by the S.C. Coroners Training Advisory Committee (the "Advisory Committee") *or* I am enrolled in a forensic science degree or certification program recognized by the Advisory Committee to be completed within one year of being elected coroner.
 - I am a medical doctor.
 - I have a Bachelor of Science degree in nursing.
11. The following supplemental education and experience information is provided to the extent applicable:
 - 1) I received an associate degree on the following date: _____.
 - 2) I received a baccalaureate degree on the following date: 5/16/1971.
 - 3) I completed a forensic science degree or certification program recognized by the Advisory Committee on the following date: _____.
 - 4) I am enrolled in the following forensic science degree or certification program recognized by the Advisory Committee to be completed within one year of being elected to the office of coroner: August 13, 2018 - August 18, 2018.
 - 5) I have _____ years of experience as a death investigator.
 - 6) I have _____ years of experience as a law enforcement officer certified by the Training Council.

Candidate Signature	<u>LaNette Samuels-Cooper</u>	Notary Signature	<u>Phillip Shayne Stephens</u>
Candidate Address	<u>P.O. Box 15 Manning, SC 29102</u>	Sworn before me on this date	<u>April 4, 2018</u>
		Notary Public Date	<u>10/09/2023</u>



SOUTH CAROLINA

EXHIBIT C



April 5, 2018

Shirley Black-Oliver
Clarendon County Board of
Voter Registration & Elections
411 Sunset Drive, PO Box 548
Manning, SC 29102

Dear Director Black-Oliver,

I am certifying the attached Democratic candidates to be placed on the ballot for the election on November 6, 2018. The candidates meet, or will meet by the time of the general election, or as otherwise required by law, the qualifications for office, which s/he has filed. (S.C. Code of Laws Section 7-13-40).

Thank you for your assistance and please contact me with any questions or concerns.

Best regards,

Trav Robertson
Chair
South Carolina Democratic Party

Enclosure

Cc: Chris Whitmire, South Carolina Elections Commission
Patricia Pringle, Chair Clarendon County Democratic Party

CLARENDON																				
Ballot Sort Order Code	Filing Level	Office	District	Associated Counties	Ballot Name (first - middle)	Ballot Name (last - suffix)	Running Mate	Candidate First Name	Candidate Middle Name	Candidate Last Name	Candidate Suffix	Party	Primary	Filing Location	Date Filed	Time Filed	Filing fee	Status	Status Date	Running Mate Office
140	County	County Treasurer		CLARENDON	Matt	Evans		Carl	M	Evans	Jr.	Democratic		CLARENDON	3/16/18	12:04	\$2,481.72	Active	3/16/18 12:05	
131	County	Coroner (Unexpired Term)		CLARENDON	Bucky	Mock		Charles	I	Mock	Jr.	Democratic	Democratic	CLARENDON	3/16/18	12:13	\$717.12	Active	3/16/18 12:19	
75	County	State House of Representatives, District 64	64	CLARENDON,SUMTER	Robert I	Ridgeway III		Robert	I	Ridgeway	III	Democratic	Democratic	CLARENDON	3/16/18	12:40	\$208.00	Active	3/16/18 12:48	
166	County	County Council District, D3	3	CLARENDON	Benton	Blakeny		Dallas	B	Blakeny		Democratic		CLARENDON	3/16/18	13:00	\$520.00	Active	3/16/18 13:08	
166	County	County Council District, D1	1	CLARENDON	Billy	Richardson		Billy	G	Richardson		Democratic		CLARENDON	3/19/18	11:36	\$520.00	Active	3/19/18 11:39	
131	County	Coroner (Unexpired Term)		CLARENDON	LaNette	Samuels-Cooper		Lanette		Samuels-Cooper		Democratic	Democratic	CLARENDON	3/19/18	11:53	\$717.12	Active	3/19/18 11:56	
166	County	County Council District, D2	2	CLARENDON	W I	Frierson		William	J	Frierson	Sr.	Democratic		CLARENDON	3/22/18	10:47	\$520.00	Active	3/22/18 10:51	
166	County	County Council District, D3	3	CLARENDON	Charlton	Watts		Julius	C	Watts	Jr.	Democratic		CLARENDON	3/28/18	14:56	\$520.00	Active	3/28/18 15:00	
135	County	Auditor		CLARENDON	Patricia	Pringle		Patricia		Pringle		Democratic		CLARENDON	3/28/18	16:43	\$2,481.72	Active	3/28/18 16:46	
166	County	County Council District, D1	1	CLARENDON	Robert A	Mcfadden Sr		Robert	A	Mcfadden	Sr.	Democratic		CLARENDON	3/30/18	8:48	\$520.00	Active	3/30/18 8:50	
75	County	State House of Representatives, District 64	64	CLARENDON,SUMTER	Mitch	Ellerby		Mitchell		Ellerby		Democratic	Democratic	CLARENDON	3/30/18	10:19	\$208.00	Active	3/30/18 10:27	

EXHIBIT D

scvotes.org

Candidate Listing for the 6/12/2018 Statewide Primary Election

For a list of all candidates, click search without selecting any search options. You can narrow your search by making selections below. If you have questions concerning your search results, please contact your County Voter Registration office.

Office:	Coroner (Unexpired Term) ▼	Party:	▼
Candidates by County:	CLARENDON ▼	Location of Filing:	▼
Candidate Last Name:	▼	Candidate Status:	▼
Candidate First Name:	▼		

Search **Change Election**

Results Found: 2

Results Shown: 1-2

<u>Office</u>	<u>Associated Counties</u>	<u>Name on Ballot</u>	<u>Party</u>	<u>Location of Filing</u>	<u>Candidate Status</u>
Coroner (Unexpired Term)	CLARENDON	<u>Bucky Nook</u>	Democratic	CLARENDON	Active
Coroner (Unexpired Term)	CLARENDON	<u>Lellette Sammie's Cooper</u>	Democratic	CLARENDON	Active

Print **Export Candidates Data File**

EXHIBIT E

the Sumter ITEM

ELECTRONICALLY FILED - 2018 Jun 14 5:12 PM - CLARENDON - COMMON PLEAS - CASE#2018CP1400237

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Coroners question Clarendon County candidate's eligibility

Disparity over what is considered valid experience



(/uploads/original/20180518-201040-LaNetteSamuels-Coope_00865.jpg)

SAMUELS-COOPER



Posted Sunday, May 20, 2018 6:00 am

BY KAYLA ROBINS

kayla@theitem.com (mailto:kayla@theitem.com)

The election for coroner in Clarendon County is heating up ahead of June 12's primary as claims have come out that the candidate challenging the incumbent is not qualified despite her claims she is.

On June 12, Democrats will choose between Coroner Charles "Bucky" Mock Jr., who replaced Hayes F. Samuels Jr. in March after his passing in January, and LaNette Samuels of the late former coroner. Mock, 73, who was a deputy coroner for more than 21 years, worked in the Clarendon County office when Samuels-Cooper was the administrator has worked for 13 years.

"She claims her experience came from being an administrative assistant, and the coroner's association says that does not qualify," Mock told The Sumter Item.

The question lies with two boxes Samuels-Cooper, 69, marked on her filing affidavit.

Of the options, which at least one must be met, Samuels-Cooper marked she has a four-year baccalaureate degree and one year of experience in death investigation with a agency, coroner or medical examiner agency. Both of those requirements total one option.

According to her filing affidavit, she graduated in in 1971, and she said she has experience in death investigation because she "ran that office."

"I was the individual that handled everything that came through that office," Samuels-Cooper said.

ELECTRONICALLY FILED - 2018 JUN 14 5:12 PM - CLARENDON - COMMON FILES - @CASE#2018CP1400237

She said her duties as administrator included managing budgets, contacting doctors, pathologists and law enforcement and filing any paperwork related to a death or death certificate. When asked if she has lead a death investigation, she said no.

"What I have done, I have gathered the information for the coroner or deputy coroner needed to finish the case," she said.

Patricia Pringle, chairwoman of the Clarendon County Democratic Party said Samuels-Cooper proved she earned her degree and sent her notarized filing affidavit to the state party chair who said is the entity in charge of validating any concerns. The state party chair was unable to be reached after missed calls back and forth.

"Personally, I think she worked in the coroner's office, so in a way, she does do death investigations because anything that has to be filed, she was doing all the relaying information," Pringle said. "In a way, even though she might not have been in the field doing it, she still had to relay all the information in."

Mock said he has never seen her go to the scene of a death. He said she also no longer works in the coroner's office after being terminated for an undisclosed reason on March 13.

The other issue Mock and now the president of the South Carolina Coroner's Association say they are trying to highlight is the question of whether a five-day class Samuels-Cooper is planning to take in August can be used in replacement of not having one year of experience in death investigation and whether that class is valid.

Samuels-Cooper marked on her filing affidavit she is taking a class Aug. 13-18 that will certify her to be coroner. The class must be taken within one year of being elected coroner. She said the class is through Saint Louis University in Missouri.

The section to mark a candidate is taking the class is listed under a section on the filing affidavit asking about "supplemental education and experience."

Dennis Fowler, the president of the coroner's association and coroner in Cherokee County, said both to The Sumter Item and in an open letter that the Coroner's Training Program of which he is a member, only recognizes one forensic science degree and certification program - the American Board of Medicolegal Death Investigators Inc. (ABDMI).

The five-day class Samuels-Cooper is planning to take is listed on ABDMI's website as a continuing education opportunity, not as the certification program and exam itself. "[ABDMI] is way more intensive than a five-day class," he said. "It's a 300-question exam."

Before someone can even apply to the exam, he said, the person must have 640 hours of death investigation experience and "currently be employed by a coroner's office or a medical examiner's office."

He said there is a reason such rigorous training is necessary.

"There's a lot of things that come together on the scene the coroner is responsible by law for two things: determining the cause and manner of death," Fowler said.

The cause is what happened - if a person died from blunt force trauma in a vehicle collision, if they died from cancer or cardiac arrest. The manner, he said, is one of five categories in South Carolina: homicide, suicide, natural, accidental or undetermined. So the manner determines whether there will be a criminal investigation into the death.

"We have to beyond a shadow of a doubt be able to prove what way. We're charged with it by the state law. How we get there is the death investigative process," Fowler said.

In interviews by The Sumter Item with Fowler, he was told neither the name of the candidate nor the county of the election in question. He said he worked to get legislation passed last year to prevent unqualified candidates from entering the office of coroner, not to protect sitting coroners and their jobs but "for the people of South Carolina."

In a county where the primaries are the election to win because there is Republican opposition on the November ballot in neither the three county nor the two state House districts, Mock likely know who they choose in June (write-ins are always an option on the November ballot).

Mock has lived in Clarendon County for 26 years. He obtained a high school diploma or its recognized equivalent in 1963.

The boxes he checked off on his filing affidavit, which was notarized on March 16, under question No. 10 are that he has at least three years of experience in death investigation with a law enforcement agency, coroner or medical examiner agency and that he has a two-year associate degree and two years of experience in death investigation with a law enforcement agency, coroner or medical examiner agency.

Under question No. 11, which asks for supplemental education and experience information, Mock marked that he received his associate degree in 1979 and that he has 26 years of experience as a death investigator.

Mock has filed two candidate campaign disclosure reports with the South Carolina State Ethics Commission. According to the agency, which monitors public disclosure of contributions and expenditures, a report is due within 10 days after spending or receiving the first \$500 of the campaign funds.

His initial report shows he received \$100 from Sharron Haley, his campaign manager and a stringer for The Sumter Item who covers Clarendon county.

Samuels-Cooper said she wants to run for coroner because she has the care and compassion needed to talk to families after a loved one's death.

"I know how to be with a family who has had a loss," she said. "I'm trying to fulfill my brother's last wish. He said finish it."

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The Manning Times

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STATE AWARD

Outstanding Individual Award for
Local Friends of the Library member
Laura Stone

● CHURCH SPOTLIGHT

Taw Caw
Missionary Baptist Church
By: Laura Stone



and continued working during every study hall and free period until she graduated from high school. She learned about cataloging and shelving and straightening books. "My love for the library comes from my experience working in a library and appreciating the staff and what they do."
When she first became Treasurer of the Friends of the Harvin Clarendon County Library eight years ago, Purvis discovered the organization had lost its 501(c)(3) status. She worked



● CORONER CANDIDATE

Meet LaNette Samuels-Cooper

By: Laura Stone



LaNette Samuels-Cooper was born in Sumter. In 1964, she attended Boggs Academy, a private Presbyterian school, in Keysville, Georgia. After graduation, Samuels-Cooper entered Johnson C. Smith University in Charlotte, North Carolina. In 1971, she earned a Bachelor's Degree in Business Administration with a concentration in marketing and economics.

Samuels-Cooper accepted a job in 1975 with Johnson

to provide information for autopsy scheduling, completing the authorizations for autopsies when needed.

Samuels-Cooper initiated a shift from sending blood samples to the South Carolina Law Enforcement Division (SLED) to sending them to AIT Labs in Denton, Texas, now AXIS Forensic Toxicology. This was due to SLED's backlog, which led to delays in processing and delays in answers for grieving families. She also

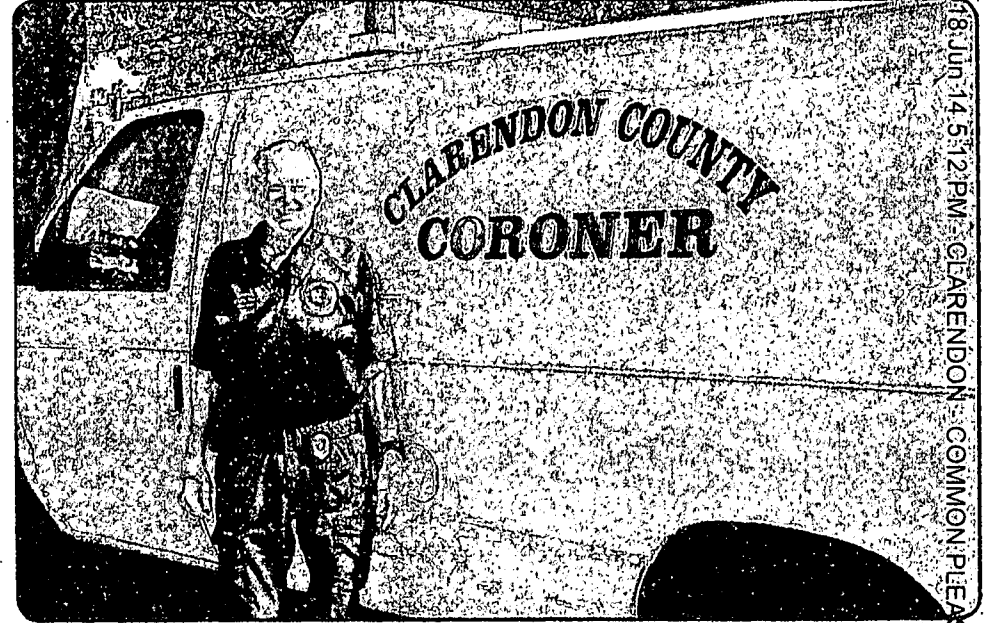
SLED who would take over. Once SLED had completed their investigation, local agencies would then perform their needed tasks. When done, they would release the body to the Coroner, who could then remove the body.

When Deputy Coroners were unavailable, Samuels-Cooper states she went out on cases. "When I went to a case it was more to see what the surroundings were, to see if there were medical issues and to speak with the

● CORONER CANDIDATE

Meet Bucky Mock

By: Laura Stone



Bucky Mock grew up in Minnesota, where he earned a nursing degree and began working as a registered nurse in an emergency room setting. He received post-Vietnam War training as a nurse practitioner. In 1982, Mock moved to Lebanon, Virginia, where he managed the ER at Russell County Medical Center. While there, he worked closely with the director of the ER, who was also the medical examiner. During this time, he gained death

appointed Mock as Acting Coroner, and on Feb 21, Governor Henry McMaster made that appointment official.

Mock has developed strong ties with local, county and state police, as well as the South Carolina Law Enforcement Division (SLED) and the Clarendon County Fire Department. He has risen to the rank of Captain with the Wyboo Station 4 with the Fire Department, and in that position, he often arrives with first re-

about it, I can explain it to them. My medical knowledge allows me to do that.

Mock continued the tradition of a Coroner's float, which points out dangers such as drinking and driving, texting and driving and drug use, in the recent Striped Bass Festival. He also plans to offer safety education classes, which he hopes to implement after the election, if elected.

To keep up with state and federal offices, Mock is computerizing current and

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& Johnson Baby Products. She moved to Manning in 1982, going to work for the Poultry and Meat Department for South Carolina as an inspector in 1983. In two years, she had worked her way up to a supervisor position, overseeing the largest district.

When her brother, Hayes F. Samuels, became Clarendon County Coroner in 2005, Samuels-Cooper went to work for him as an office administrator for the Coroner's Office. "As the Coroner and as the funeral director and embalmer, he couldn't always be here when questions came up for the office. So he needed someone to help him in that department, and I was the one."

During her time as office administrator, Samuels-Cooper became aware of the low pay of the Deputy Coroner staff. She assisted in raising the budget to accommodate pay raises for the Deputy Coroners.

Samuels-Cooper was instrumental in assisting law enforcement when Samuels was performing a funeral. "I assisted them with investigations as far as getting them the necessary materials they needed for their cases." She established a rapport with MUSC and the pathologist

assisted in implementing a color-coded tagging system for body identification.

Often awakened in the wee hours of the morning with a call from the Coroner, Samuels-Cooper remained at the ready to assist with setting up an autopsy, making necessary phone calls and scheduling with a pathologist as soon as possible. "I became known to them." Experienced in subpoenaing medical records and necessary physical evidence, Samuels-Cooper ensured all needed evidence was brought in to the Coroner's Office for investigation purposes.

Over the years, Samuels-Cooper worked cases with the Sheriff's Department, municipal police departments, SLED and with other county departments in cross-county situations. During this time, she built relationships with these agencies, working well with them.

Samuels-Cooper respects other law enforcement and fire agencies and would allow them to perform their necessary duties before coming to the scene. According to Samuels-Cooper, the responding local agency would quickly check the premises, then contact

issues and to speak with the resident manager."

If she becomes Coroner, Samuels-Cooper plans to maintain an open-door policy for authorized family to obtain information. She feels her depth of caring is her strongest point she can bring to the Coroner's Office. She recognizes Manning as home, and cares deeply about the community. Her deep desire to help Clarendon County families drives her campaign to become County Coroner.

Samuels-Cooper cited the one-year window to gain certification as a new Coroner, and she has signed up to take the one-week certification course starting in August. She feels any new job is a learning process and new coroners don't necessarily have an investigative background or experience identifying the dead. "But they learn. Every job anyone goes on for the first time, they have that window to learn. I'm bringing in 13 years of working with the dead, working with the families, working with law enforcement. I know the procedures. I know what I'm capable of doing. I promise this community, I will speak for the dead."

At this time, he gained death investigation experience as well as experience with the court system while testifying on behalf of the medical examiner's office.

In 1992, Mock moved to Clarendon County as ER Manager for Clarendon Memorial Hospital. Soon after he arrived, he took a forensics course in sexual assault examination. In 1998, he joined the Clarendon County Fire Department.

In 1997, Mock became Deputy Coroner under Clarendon County Coroner Ranny Stephens. When Hayes F. Samuels, Jr., took the office, he asked Mock to stay on as Deputy Coroner. During his 21 years as a Deputy Coroner, he has worked on thousands of cases, including many cases involving a high level of investigation. "I want to find out as much as I can, and I work with law enforcement to do that," said Mock.

After Samuels' death in January, Clarendon County

often arrives with just responders, performing duties as coroner when needed. As investigations proceed, he works closely with local and state agencies, keeping them informed of his findings.

Mock works closely with medical professionals as well, communicating with doctors and medical staff regarding patient histories and determining whether there is a need for an autopsy. In the event an autopsy is necessary, he provides any information found to the medical staff. "In my medical background, we kept the doctors informed, and they kept the nurses informed. This is a continuation of that relationship."

Also in the event of an autopsy, Mock ensures families are provided with information and any questions are answered. "When I get an autopsy back, I don't make the family come looking for it. I give them a call and say this is what we found. And when they ask questions

computerizing current and past records. This ensures data protection, data maintenance and easier retrieval of information. He is also sending out press releases when appropriate, ensuring the media releases correct information to the public.

As the first Clarendon County Coroner with both medical experience and death investigation experience, Mock is also the first Clarendon County Coroner who is not a funeral home director. However, he knows the funeral homes well and feels they work well together.

Mock cares about Clarendon County and its residents. "What I do for the community is I help people. Being a fireman, I'm helping people. Being a nurse, I help people. I'm part of the disaster medical assistance team which is part of Health and Human Services. Everything I do is aimed at helping people."



● MONTHLY TOWN MEETING

Summerton Town Council Meeting



Mr. Junious with the Clarendon County Branch of the NAACP provided an update regarding the upcoming 63rd Annual Briggs

Pollard brought up Duck Fest and presented the suggestion that more prizes are offered for the cooking contest this year to gain more

with flushable wipes clogging pipes and tanks. They have lost one pump in the area and have been going door-to-door attempting

EXHIBIT 2

EXHIBIT A

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
)
 COUNTY OF CLARENDON) IN THE THIRD JUDICIAL CIRCUIT
)
 Bucky Mock,) Civil Action No. 2018-CP-14-_____
)
)
 Plaintiff,)
)
 vs.)
)
) **SUMMONS**
)
 Clarendon County Board of Voter)
 Registration & Elections, Clarendon)
 County Democratic Party, LaNette)
 Samuels-Cooper, South Carolina)
 Democratic Party, and South Carolina)
 Election Commission,)
)
 Defendants.)
)

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 Complaint upon the subscribers at their office at 1310 Gadsden Street, Post Office Box 11449, Columbia, South Carolina, 29211, within thirty (30) days after the service hereof, exclusive of the date of such service. The Plaintiff does hereby notify you that in case of your failure to do so, judgment by default will be rendered against you for the relief demanded in the Complaint.

SOWELL GRAY ROBINSON STEPP & LAFFITTE, LLC

By: s/ Robert E. Tyson, Jr.
 Robert E. Tyson, Jr., SC Bar #10820
 Vordman Carlisle Traywick, III, SC Bar No. 102123
 1310 Gadsden Street
 Post Office Box 11449
 Columbia, South Carolina 29211
 (803) 929-1400

Columbia, South Carolina
June 14, 2018

Attorneys for Plaintiff

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF CLARENDON)	IN THE THIRD JUDICIAL CIRCUIT
)	
Bucky Mock,)	Civil Action No. 2018-CP-14-_____
)	
Plaintiff,)	
)	
vs.)	
)	<u>COMPLAINT</u>
)	
Clarendon County Board of Voter)	
Registration & Elections, Clarendon)	
County Democratic Party, LaNette)	
Samuels-Cooper, South Carolina)	
Democratic Party, and South Carolina)	
Election Commission,)	
)	
Defendants.)	
)	

Plaintiff Bucky Mock (hereinafter “Mock”), complaining of the defendants Clarendon County Board of Voter Registration & Elections, Clarendon County Democratic Party, LaNette Samuels-Cooper (hereinafter “Samuels-Cooper”), South Carolina Democratic Party, and South Carolina Election Commission (hereinafter “State Election Commission”), alleges as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Bucky Mock is a resident of Clarendon County, South Carolina.
2. Defendant South Carolina Election Commission is a statutorily created entity that has general supervisory authority over elections in the State of South Carolina.
3. Defendant Clarendon County Board of Voter Registration & Elections is an entity that has supervisory authority over and conducts elections for Clarendon County, South Carolina.
4. Defendant Clarendon County Democratic Party is a duly organized entity charged with certifying individuals running for political office.

5. Defendant LaNette Samuels-Cooper is an individual running for the office of Coroner for Clarendon County, and upon information and belief, is a resident of Clarendon County, South Carolina.

6. South Carolina Democratic Party is a duly organized entity charged with running the state Democratic Party and certifying individuals running for political office.

7. Article V, Section 11 of the South Carolina Constitution provides that the circuit court shall be a general trial court with original jurisdiction in civil matters and courts shall have jurisdiction over matters seeking an injunction.

8. Jurisdiction and venue in this Court are proper.

FACTS

9. Mock currently serves as the Coroner of Clarendon County.

10. Defendant Samuels-Cooper seeks the Democratic Party's nomination for the office of Coroner of Clarendon County.

11. Mock asks this Court to declare Defendant Samuels-Cooper does not meet the statutorily required qualifications of section 17-5-130 of the South Carolina Code to be a candidate for coroner in South Carolina.

12. The filing period for candidates seeking a political party nomination ran from March 16, 2018, through March 30, 2018.

13. The Primary Election date was June 12, 2018. Unqualified candidate Defendant Samuels-Cooper received the most votes.

14. The General Election date is November 6, 2018, pursuant to sections 7-13-10 and -20 of the South Carolina Code.

15. Section 7-11-15 of the South Carolina Code provides qualifications to run as a candidate in general elections. For candidates seeking to be a political party nominee, to qualify as a candidate to run in the general election, a candidate must file a statement of intention of candidacy, a party pledge, and filing fees to the county board of voter registration and elections. S.C. Code Ann. § 7-11-15(A)(3).

16. The election commission with whom the documents were filed must provide them to the appropriate political party committee within two days. S.C. Code Ann. § 7-11-15(B).

17. Section 7-13-40 of the South Carolina Code provides the political party must certify and provide written verification of a candidate's qualifications to Defendant State Election Commission and/or Defendant Clarendon County Board of Voter Registration & Elections.

18. Plaintiff Mock filed as a Democrat the required documents with the Clarendon County Board of Voter Registration & Elections on March 16, 2018. He meets the statutory requirements to be elected Coroner of Clarendon County. See **Exhibit A**.

19. Defendant Samuels-Cooper filed as a Democrat the filing documents with the Clarendon County Board of Voter Registration & Elections on March 19, 2018. **Exhibit B**. The statutorily required affidavit filed by Samuels-Cooper is deficient because she marked boxes inaccurately. *Id.*

20. Defendant Clarendon County Democratic Party improperly certified Defendant Samuels-Cooper, even though Samuels-Cooper does not meet the statutory requirements of section 17-5-130 of the South Carolina Code.

21. Defendant Clarendon County Democratic Party improperly verified that Defendant Samuels-Cooper met the statutorily required qualifications when the Clarendon

County Democratic Party forwarded her name as the Democratic nominee to Defendant Clarendon County Board of Voter Registration & Elections and/or Defendant State Election Commission.

22. Defendant South Carolina Democratic Party improperly verified Defendant Samuels-Cooper met the statutorily required qualifications when it sent a letter on April 5, 2018, to the Clarendon County Board of Voter Registration and Elections stating she met the qualifications for the office. **Exhibit C.**

23. On Defendant State Election Commission's website, it lists Plaintiff Mock and Defendant Samuels-Cooper as certified candidates for Coroner of Clarendon County. **Exhibit D.**

24. Defendant State Election Commission incorrectly and improperly lists Defendant Samuels-Cooper as a certified candidate for Coroner of Clarendon County when she does not meet the statutory requirements.

25. South Carolina law requires candidates for coroner to meet specific criteria to become coroner. S.C. Code Ann § 17-5-130. Pursuant to the statute, a candidate can qualify by one of several options. Importantly, the law requires coroners to meet specific educational requirements and to have had specific death investigations experience.

26. To demonstrate a candidate meets these qualifications, section 17-5-130(B) of the South Carolina Code requires a candidate to file an affidavit at the time he or she files to run for office.

27. If a candidate is running to be the nominee of a political party, the candidate also must file the affidavit with the political county party for which he or she seeks the nomination.

28. Section 17-5-130(B) of the South Carolina Code mandates the affidavit contain specific information including when the candidate completed the recognized forensic science

degree or certification program or information regarding the person's enrollment in a recognized forensic science degree or certification program.

29. Defendant Samuels-Cooper had notice that she did not meet the qualifications to be a coroner in South Carolina under section 17-5-130. **Exhibit E**. As of the timing of the filing of this Complaint, however, she has failed to withdraw.

30. In Defendant Samuels-Cooper's Filing Affidavit, she checked the box that she has a "four-year baccalaureate degree and one year of experience in death investigation with a law enforcement agency, coroner, or medical examiner agency." However, this information is false because she has not conducted death investigations. State law requires that a candidate provide how she qualifies for this position; thus, Samuels-Cooper failed to comply with the law.

31. Defendant Samuels-Cooper has not completed a recognized forensic science degree or certification program. In fact, she says "she is enrolled for a program for August 13, 2018 – August 18, 2018." However, this program is not the forensic science degree and certification program recognized by the Coroners Training Advisory Committee which has been delegated the statutory authority to make such a determination in subsection 17-5-130(G) of the South Carolina Code. The recognized process and program is sponsored by the American Board of Medicolegal Death Investigators (ABMDI). To be eligible for the ABMDI process one must have 640 hours of death investigation experience prior to going through the program.

32. Defendant Samuels-Cooper, upon information and belief, at the time she filed her affidavit, was not enrolled in the statutorily recognized forensic science degree or certification program.

33. Defendant Samuels-Cooper's affidavit is deficient, and she is not qualified to be a coroner in South Carolina.

34. Defendants Clarendon County Democratic Party and South Carolina Democratic Party knew or should have known that Defendant Samuels-Cooper did not meet the qualifications to be a coroner, yet they certified her and forwarded her name to Defendant Clarendon County Board of Voter Registration & Elections as the nominee for Coroner of Clarendon County.

35. Defendant Clarendon County Board of Voter Registration & Elections received Defendant Samuels-Cooper's name as a candidate and, upon information and belief, forwarded her name to the Defendant South Carolina Election Commission as a candidate and improperly placed her on the ballot.

36. These actions taken by Defendant Samuels-Cooper, Defendant Clarendon County Democratic Party, Defendant South Carolina Democratic Party, Defendant Clarendon County Board of Voter Registration & Elections, and Defendant State Election Commission are wrongful and in disregard of the statutory requirements for being a coroner.

37. The actions and omissions have harmed Plaintiff Mock and the public of Clarendon County. Mock was forced to campaign against a candidate who is not qualified, nor can Defendant Samuels-Cooper become qualified to be elected Coroner of Clarendon County in 2018. Thus, Mock and the citizens of Clarendon County have been harmed by having a candidate win the primary election who is not a qualified candidate, and cannot become a qualified candidate, for coroner.

FOR A FIRST CAUSE OF ACTION
(Declaratory Judgment)

38. Each allegation contained above is realleged and incorporated by reference.

39. Defendant Samuels-Cooper is not qualified to become a coroner because she has not met the criteria of section 17-5-130 of the South Carolina Code.

40. Defendant Samuels-Cooper's affidavit is deficient and does not detail how she meets the qualifications of South Carolina law.

41. Defendant Clarendon County Democratic Party and South Carolina Democratic Party improperly certified Samuels-Cooper as meeting the statutory qualifications.

42. Defendants Clarendon County Board of Voter Registration & Elections and State Election Commission improperly received and certified Defendant Samuels-Cooper as being qualified and listing her name as a candidate for the general election.

43. Therefore, pursuant to its authority set forth in section 15-53-20 of the South Carolina Code, Plaintiff Mock seeks a declaration from the Court that Defendant Samuels-Cooper does not meet the statutory requirements to become the Coroner of Clarendon County.

FOR A SECOND CAUSE OF ACTION
(Injunctive Relief)

44. Each allegation contained above is realleged and incorporated by reference.

45. Plaintiff seeks an injunction preventing and enjoining (1) the State Election Commission and/or the Clarendon County Board of Voter Registration & Elections from certifying Samuels-Cooper as a candidate for coroner; (2) the State Election Commission and/or the Clarendon County Board of Voter Registration & Elections from placing Defendant Samuels-Cooper's name on the ballot for the general election to be held November 6, 2018; and (3) the Clarendon County Democratic Party and South Carolina Democratic Party from certifying Defendant Samuels-Cooper as its nominee for coroner because she does not meet the statutory requirements.

46. The injunction sought by Plaintiff is necessary to prevent irreparable harm to Plaintiff who is without an adequate remedy at law.

47. Plaintiff will suffer irreparable harm of being incapable of becoming Coroner of Clarendon County if the injunction is not granted. Under sections 7-11-10 and 7-11-210 of the South Carolina Code, Plaintiff is prevented from being a candidate in the general election and appearing on the ballot.

48. Plaintiff is likely to succeed on the merits in this litigation because Defendant Samuels-Cooper is not qualified under section 17-5-130 of the South Carolina Code and should not have been certified to be a candidate Coroner of Clarendon County.

49. Defendants Clarendon County Democratic Party and South Carolina Democratic Party knew or should have known that Defendant Samuels-Cooper did not meet the statutory qualifications to be a coroner.

50. Under section 7-13-40 of the South Carolina Code, Defendants Clarendon County Democratic Party and South Carolina Democratic Party improperly certified and forwarded Defendant Samuels-Cooper's name to Defendant Clarendon County Board of Voter Registration & Elections as the nominee for Coroner of Clarendon County.

51. Under section 7-11-15(B) of the South Carolina Code, Defendants Clarendon County Board of Voter Registration & Elections and State Election Commission improperly received and certified Defendant Samuels-Cooper as being qualified and improperly listed her name as a candidate for the general election.

52. Plaintiff is without an adequate remedy at law. If a protest was filed pursuant to the process outlined in sections 7-17-520, -530, -540, and -550 of the South Carolina Code, Mock would not have an adequate remedy at law because Defendants Clarendon County

Democratic Party and the South Carolina Democratic Party would act as the “jury” and “court” for a protest, thereby preventing Mock a fair hearing.

53. The actions of the State Election Commission and/or the Clarendon County Board of Voter Registration & Elections, by certifying Samuels-Cooper as a qualified candidate, are expected to continue to cause harm to Plaintiff unless the State Election Commission and/or the Clarendon County Board of Voter Registration & Elections are enjoined.

54. Plaintiff is entitled to a temporary restraining order, a preliminary injunction, and a permanent injunction, including but not limited to, prohibiting (1) the State Election Commission and/or the Clarendon County Board of Voter Registration & Elections from certifying Samuels-Cooper as a candidate for coroner; (2) the State Election Commission and/or the Clarendon County Board of Voter Registration & Elections from placing Defendant Samuels-Cooper’s name on the ballot for the general election to be held November 6, 2018; and (3) the Clarendon County Democratic Party and South Carolina Democratic Party from certifying Defendant Samuels-Cooper as its nominee for coroner because she does not meet the statutory requirements.

55. Plaintiff also is entitled to an order from this Court requiring the State Election Commission and/or the Clarendon County Board of Voter Registration & Elections to remove Defendant Samuels-Cooper from the ballot as a candidate for Coroner of Clarendon County.

WHEREFORE, Plaintiff seeks an order and judgment against the Defendants for a declaratory judgment that Defendant Samuels-Cooper does not meet the statutory qualifications to become Coroner of Clarendon County and a temporary restraining order, a preliminary injunction, and a permanent injunction, enjoining Defendant Samuels-Cooper from running for

Coroner of Clarendon County and for such other and further relief as is just and proper,
including recovery of costs and attorneys' fees.

SOWELL GRAY ROBINSON STEPP & LAFFITTE, LLC

By: s/ Robert E. Tyson, Jr.

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(803) 929-1400

Attorneys for Plaintiff

Columbia, South Carolina
June 14, 2018

EXHIBIT A

Statement of Intention of Candidacy & Party Pledge

This form must be filed with the appropriate election office by any candidate seeking a political party's nomination. All information on this form will be made available to the public at the time of filing. For more information, visit www.scVOTES.org/candidate-information.

Name	CHARLES J. "BUCKY" MOCK, JR	Party	Democratic
Office	Coroner	District	Clarendon
Voter Reg. #	142714276	Primary or Convention Date	06/12/2018
		Election Date	11/06/2018

Name on ballot may be any combination of a candidate's given name, derivative of the given name, or nickname. A derivative name or nickname must be used in good faith for honest purposes and may not imply professional or social status, an office, or military rank. A nickname may not exceed 15 letters.

Name on Ballot **Bucky Mock**

Name pronunciation, if necessary, for audio ballot (e.g., Jackson Gervais: jur-VAY)

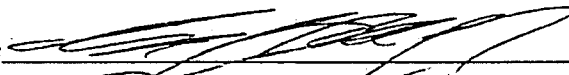
Candidate Contact Information (address not required to be residence address)

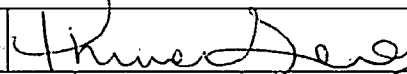
Address	1245 Striper Dr	City	Manning	Zip	29102
Phone	803-460-5439	Email	buckymock44@yahoo.com		

Party Pledge (Party Pledge not applicable to designees for the Office of Lieutenant Governor)

I hereby file my notice as a candidate for the nomination as Coroner Clarendon (Office Name) in the primary election or convention to be held on 06/12/2018 (Primary or Convention Date). I affiliate with the Democratic (Party Name) Party, and I hereby pledge myself to abide by the results of the primary or convention. I shall not authorize my name to be placed on the general election ballot by petition and will not offer or campaign as a write-in candidate for this office or any other office for which the party has a nominee. I authorize the issuance of an injunction upon ex parte application by the party chairman, as provided by law, should I violate this pledge by offering or campaigning in the ensuing general election for election to this office or any other office for which a nominee has been elected in the party primary election, unless the nominee for the office has become deceased or otherwise disqualified for election in the ensuing general election.

Candidate's Oath
I hereby affirm that I meet, or will meet by the time of the general or special election, or as otherwise required by law, the qualifications for this office.

Candidate Signature  Date 03/16/2018
Candidate must sign in the presence of an Election Official or Notary Public.

Election Official Signature 

Date Received 3-16-2018 Time Received 12:13p.m. SEC Clarendon County Board

For use if candidate signs in presence of Notary Public

Name of Notary Public	My Commission Expires	
Signature of Notary Public	Date	

ELECTRONICALLY FILED 2018 JUN 14 5:12 PM CLARENDON COMMON PLEAS CASE#2018CP1409227

EXHIBIT B

FILING AFFIDAVIT - CORONER

STATE OF SOUTH CAROLINA
County of CLARENDON

I, Charles J. "Bucky" Mock, Jr., being duly sworn, hereby state or affirm that:

1. I am offering my candidacy for the Office of Coroner via nomination by the Democratic Party
2. As evidenced by the statements and information selected, indicated, or otherwise provided below, I meet all of the qualification requirements for Coroner set forth in S.C. Code § 17-5-130.
3. My date of birth is 06/17/1944 and my place of birth is Chicago, Illinois.
4. I am a citizen of the United States.
5. I am a resident of Clarendon County and have been a resident for 26 years.
6. I am a registered voter in Clarendon County.
7. I will have attained the age of at least twenty-one years prior to the date of election for this office.
8. I obtained a high school diploma or its recognized equivalent by the State Department of Education on the following date: May 1963.
9. I have not been convicted of a felony or an offense involving moral turpitude contrary to the laws of this State, another state, or the United States.
10. I meet at least one of the following education and/or experience requirements: *[check all that apply]*
 - I have at least three years of experience in death investigation with a law enforcement agency, coroner, or medical examiner agency.
 - I have a two-year associate degree *and* two years of experience in death investigation with a law enforcement agency, coroner, or medical examiner agency.
 - I have a four-year baccalaureate degree *and* one year of experience in death investigation with a law enforcement agency, coroner, or medical examiner agency.
 - I am a law enforcement officer, as defined by S.C. Code § 23-23-10(E)(1), who is certified by the S.C. Law Enforcement Training Council (the "Training Council") with a minimum of two years of experience.
 - I have completed a forensic science degree or certification program recognized by the S.C. Coroners Training Advisory Committee (the "Advisory Committee") *or* I am enrolled in a forensic science degree or certification program recognized by the Advisory Committee to be completed within one year of being elected coroner.
 - I am a medical doctor.
 - I have a Bachelor of Science degree in nursing.
11. The following supplemental education and experience information is provided to the extent applicable:
 - 1) I received an associate degree on the following date: May 1979.
 - 2) I received a baccalaureate degree on the following date: _____.
 - 3) I completed a forensic science degree or certification program recognized by the Advisory Committee on the following date: _____.
 - 4) I am enrolled in the following forensic science degree or certification program recognized by the Advisory Committee to be completed within one year of being elected to the office of coroner: _____.
 - 5) I have 22 years of experience as a death investigator.
 - 6) I have _____ years of experience as a law enforcement officer certified by the Training Council.


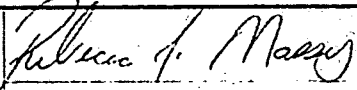
Candidate Signature		Notary Signature	
Candidate Address	<u>1245 STRIPED DR MARINA SC 29102</u>	Sworn before me on this date	<u>16th F March 2018</u>
		Commission expiration date	<u>10/24/2020</u>

EXHIBIT 3

----- Forwarded Message -----

From: Trav Robertson <trav@scdp.org>
To: Bucky Mock <buckymock44@yahoo.com>
Cc: Philip Chambers <phil@scdp.org>
Sent: Friday, April 6, 2018, 11:21:27 AM EDT
Subject: Re: Coroner Candidate

April 6, 2018

Mr. Mock,

My hope is that you are having a great day. The South Carolina Democratic Party is in receipt of your email and attachment. After consulting with legal counsel and based on the advice of legal counsel, we certified all Democratic candidates seeking the position of coroner in Clarendon County.

Please do not hesitate to call on us if we can be of any service to you or Clarendon County.

On Wed, Apr 4, 2018 at 4:59 PM, Bucky Mock <buckymock44@yahoo.com> wrote:
Mr. Robertson,

Please find below an attachment from the South Carolina Coroner's Association outlining the qualification to run and hold the office of Coroner in South Carolina.

Please review the qualifications due to the fact that there is a candidate in Clarendon County that is seeking election that I feel is not qualified to run for the position according the qualifications that are mandated by state law. She has listed on her filing affidavit that she will take a one (1) week course at St. Louis University on Medicoleagal Death Investigators Training. As you will see on the attached qualifications from the Coroner's Association, this course will not qualify her to be a candidate for this position.

I am asking that you review this information and determine if she is qualified or not.

Please let me know of your findings.

Thank you,

Bucky Mock
Clarendon County Coroner
803-460-5439

Trav Robertson
South Carolina Democratic Party, Chair

SOUTH CAROLINA CORONER'S ASSOCIATION



ELECTRONICALLY FILED - 2018 JUL 24 4:07 PM - CLARENDON - COMMON PLEAS - CASE#2018CP1400237

April 2, 2018

To Whom It May Concern:

I am the coroner for Cherokee County in South Carolina, and I submit this letter based upon my personal knowledge. I am also the President of the South Carolina Coroner's Association ("SCCA").

By virtue of my role as President of the SCCA, I am a member of the Coroner's Training Advisory Committee, which under section 17-5-130(G) of the South Carolina Code, is charged with the duty "to determine those forensic science degree and certification programs that qualify as "recognized" pursuant to the requirements of this section." S.C. Code Ann. 17-5-130(G).

The Coroner's Training Advisory Committee has unanimously approved the American Board of Medicolegal Death Investigators, Inc. ("ABMDI") certification program as the only recognized forensic science degree or certification program for coroners.

The Coroner's Training Advisory Committee selected this program because it is a rigorous training program that properly prepares persons considering being a coroner in forensic science and death investigation. Before one can apply to the ABMDI certification program, the person must have 640 hours of death investigation experience and currently be employed by a coroner's office or medical examiner's office. Any person who does not have 640 hours of death investigation experience in a coroner's office or medical examiner's office is not able to apply to this program and therefore would not be enrolled in the "recognized" certification program in the state of South Carolina.

In addition, below is the entire South Carolina Statute regarding qualifications for coroner.

SECTION 17-5-130. Coroner qualifications; affidavits of candidates; training; exemptions; Coroners Training Advisory Committee; Expenses.

(A)(1) A coroner in this State shall have all of the following qualifications, the person shall:

- (a) be a citizen of the United States;
- (b) be a resident of the county in which the person seeks the office of coroner for at least one year before qualifying for the election to the office;
- (c) be a registered voter;
- (d) have attained the age of twenty-one years before the date of qualifying for election to the office;
- (e) have obtained a high school diploma or its recognized equivalent by the State Department of Education; and
- (f) have not been convicted of a felony offense or an offense involving moral turpitude contrary to the laws of this State,

another state, or the United States.

(2) In addition to the requirements of subsection (A)(1), a coroner in this State shall have at least one of the following qualifications, the person shall:

(a) have at least three years of experience in death investigation with a law enforcement agency, coroner, or medical examiner agency;

(b) have a two-year associate degree and two years of experience in death investigation with a law enforcement agency, coroner, or medical examiner agency;

(c) have a four-year baccalaureate degree and one year of experience in death investigation with a law enforcement agency, coroner, or medical examiner agency;

(d) be a law enforcement officer, as defined by Section 23-23-10(E)(1), who is certified by the South Carolina Law Enforcement Training Council with a minimum of two years of experience;

(e) have completed a recognized forensic science degree or certification program or be enrolled in a recognized forensic science degree or certification program to be completed within one year of being elected to the office of coroner;

(f) be a medical doctor; or

(g) have a bachelor of science degree in nursing.

(B)(1) A person who offers his candidacy for the office of coroner, no later than the close of filing, shall file a sworn affidavit with the county executive committee of the person's political party.

(2) The county executive committee of a political party with whom a person has filed his affidavit must file a copy of the affidavit with the appropriate county election commission by noon on the tenth day following the deadline for filing affidavits by candidates. If the tenth day falls on a Saturday, Sunday, or holiday, the affidavit must be filed by noon the following day.

(3) A person who seeks nomination by petition for the office of coroner, no later than the close of filing, shall file a sworn affidavit with the county election commission in the county of his residence.

(4) The affidavit required by the provisions of this subsection must contain the following information:

(a) the person's date and place of birth;

(b) the person's citizenship;

(c) the county the person is a resident of, and how long the person has been a resident of that county;

(d) whether the person is a registered voter;

(e) the date the person obtained a high school diploma or its recognized equivalent by the State Department of Education;

(f) whether the person has been convicted of a felony offense or an offense involving moral turpitude contrary to the laws of this State, another state, or the United States;

(g) the date the person obtained an associate or baccalaureate degree, if applicable;

(h) the date the person completed a recognized forensic science degree or certification program, or information regarding the person's enrollment in a recognized forensic science degree or certification program, if applicable; and

(i) the number of years of experience the person has as a death investigator, certified law enforcement officer, or licensed private investigator, if applicable.

If in the event you may have any questions, please feel free to call me.

Sincerely,

Dennis Fowler

Cherokee County Coroner

President South Carolina Coroner's Association

ELECTRONICALLY FILED - 2018 Jul 24 4:07 PM - CLARENDON - COMMON PLEAS - CASE#2018CP1400237

----- Forwarded Message -----

From: Patricia Pringle <patriciapringle@icloud.com>
Cc: Alex Craven <accraven@charlestonlaw.edu>; Mary Cooper <mcooper1948@ftc-i.net>; Willie Briggs <willie.briggs215@gmail.com>; Kaye Kirkpatrick <kaykirkpatrick2@gmail.com>; Linda Jackson <bryajackson1@gmail.com>; "patriciapringle@icloud.com" <patriciapringle@icloud.com>; Cassie Nelson <cricket_2_29148@yahoo.com>
Sent: Thursday, April 5, 2018, 3:42:29 PM EDT
Subject: Fwd: SCDP Certified Candidates - Clarendon

Candidates:

Congratulations on being certified for your name to be placed on the ballot for this 2018 election cycle per the South Carolina Democratic Party.

The Clarendon County Democratic Party is looking forward to working with you to insure a smooth, successful and respectful election. Once the Primary is behind us then we will be full speed ahead to secure Democratic positions locally and statewide.

Please let us know if we can be of assistance.

Thanks,
Patricia Pringle
Clarendon County Democratic Party Chairwoman
803-473-8393

Begin forwarded message:

From: Philip Chambers <phil@scdp.org>
Date: April 5, 2018 at 10:18:15 AM EDT
To: sblackoliver@clarendoncountygov.org, patriciapringle@icloud.com, Trav Robertson <trav@scdp.org>
Subject: SCDP Certified Candidates - Clarendon

Attached please find a letter from South Carolina Democratic Party Chairman Trav Robertson certifying the Democratic Candidates in your county and the list of candidates.

Best,

Phil

--

Philip Chambers
Chief of Staff
South Carolina Democratic Party

RECEIVED

OCT 02 2018

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CLARENDON COUNTY
Court of Common Pleas

R. Ferrell Cothran, Jr., Circuit Court Judge

RECEIVED

OCT 01 2018

Appellate Case No. 2018-001520

SC Court of Appeals

Bucky Mock,

Respondent,

v.

Clarendon County Board of Voter Registration &
Elections, Clarendon County Democratic Party,
LaNette Samuels-Cooper, South Carolina Democratic
Party, and South Carolina Election Commission,

Defendants,

Of which LaNette Samuels-Cooper is the Appellant.

PROOF OF SERVICE

I certify that I have caused the service of Respondent-Appellant's Motion to Supplement the Record on Appeal on Appellant-Respondent and Defendants by U.S. Mail on October 1, 2018 to the attorneys of record at the following addresses:

Counsel Served: Ronnie A. Sabb, Esq.
 Kimberly V. Barr, Esq.
 Kimberly M. Hodge, Esq.
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 Kingstree, South Carolina 29556
 Counsel for Appellant


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 Kent Law Firm
 19 Mill Street
 Manning, South Carolina 29102
 Counsel for Clarendon County Board of Voter Registration & Elections

J. Eric Cavanaugh, Esq.
Joseph Thickens, Esq.
Cavanaugh & Thickens
Post Office Box 2409
Columbia, South Carolina 29202
***Counsel for South Carolina Democratic Party and
Clarendon Co. Democratic Party***

Harrison D. Brant, Esq.
1122 Lady Street, Suite 500
Columbia, South Carolina 29201

T. Parkin C. Hunter, Esq.
SC Attorney General's Office
Post Office Box 11549
Columbia, South Carolina 29211
Counsel for South Carolina State Election Commission

ROBINSON GRAY STEPP & LAFFITTE, LLC

By:  _____

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Attorneys for Respondent Bucky Mock