

George M. Adams, #181283
Broad River Correctional Institution
4460 Broad River Road (Wat. 147-B)
Columbia, South Carolina 29210

Date: 4, APR 11, 2019

RECEIVED

AUG 08 2019

SC Court of Appeals

Richland County Sheriff
Richland County Sheriff Department
5623 Two Notch Road
Columbia, South Carolina 29223

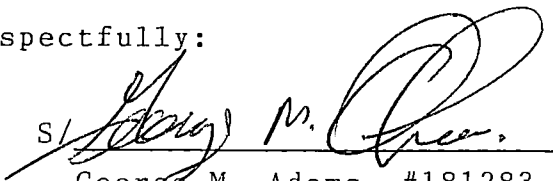
RE: State v. George M. Adams 2019CP4002137

Please Note: Richland County Sheriff:

I am making a specific request under Kyles v. Whitley, 514 U.S. 419 (1995), Disclosure, as you know from that case, the United States Supreme Court imposed upon Law Enforcement and Prosecutors a "Duty to Warn" favorable information relating to defendant's arrest June 17, 1992.

I request that all officers and investigative agencies from June 17, 1992, to present, concerned with this case making certain that I am apprized, in writing, of any information or evidence of producing the arrest warrants for Murder/Armed Robbery dated June 17, 1992. The request also extends to information reasonably tending to question the credibility of any prosecution witness in this case.

Respectfully:


S/ George M. Adams

George M. Adams, #181283
Broad River Correc. Inst.
4460 Broad River Road
Columbia, S.C. 29210

cc: File
Columbia, S.C. 29210

STATE OF SOUTH CAROLINA,)
)
COUNTY OF Richland)
)
GEORGE M. Adams, #181283)
)
Plaintiff)

IN THE MAGISTRATE COURT

MOTION AND AFFIDAVIT TO
PROCEED IN FORMA PAUPERIS

2019CP400 2137

vs.)
)
Richland County Sheriff)
)
DEPARTMENT, ET AL Defendant.)

FILE NO. _____

I, GEORGE M. Adams, #181283, being duly sworn, state that I am the plaintiff and that I do not have the funds available to pay the costs of filing and service in the present matter. I hereby request that the complaint be filed and service made without costs.

Sworn to and Subscribed before me)
this _____ day of _____, 2019.)

Notary Public for South Carolina)
My Commission expires _____)

[Signature]
Signature of Plaintiff or
Person Filing Complaint on Behalf of
Plaintiff

RECEIVED
RICHLAND COUNTY
2019 APR 18 AM 11:30
JEANETTE M. MORRIS
CLERK OF COURT

ORDER

Leave is granted to proceed in forma pauperis without payment of the filing fee.

Leave is granted to proceed in forma pauperis without payment of the service costs.

Leave is denied to proceed in forma pauperis.

Plaintiff shall pay the required filing fee no later than May 31, 2019, or this case will be dismissed.

Dated: April 18, 2019
Columbia, South Carolina

[Signature]
JUDGE/CLERK OF COURT

2019 APR - 8 PM 1:47
JEANETTE M. MORRIS
CLERK OF COURT

NOTICE TO PLAINTIFF: The Court may assess costs against either party at hearing.

STATE OF SOUTH CAROLINA)
COUNTY OF Richland)

IN THE COURT OF GENERAL SESSIONS
5th JUDICIAL CIRCUIT

THE STATE OF SOUTH CAROLINA)

**AFFIDAVIT OF INDIGENCY
AND
APPLICATION FOR COUNSEL**
(Defense of Indigency Act, Form No.2)

vs.)

GEORGE M. ADAMS #181283)

CRIMINAL CHARGING DOCUMENT NO. D-369126,27 92-GS-40-11316,17

NAME OF APPLICANT	
ADDRESS	
TELEPHONE NUMBER(S)	
DATE OF BIRTH	
SOCIAL SECURITY NO.	
NAMES OF CO-DEFENDANTS	

1. Are you presently employed? Yes No
- a. If "yes", state the amount of your salary or wages per month, and give the name and address of your employer.

SALARY OR WAGES PER MONTH	NAME AND ADDRESS OF EMPLOYER

If "no", state the name and address of last employment, date of termination of employment, and amount of your salary or wages per month.

SALARY OR WAGES PER MONTH	NAME AND ADDRESS OF EMPLOYER	TERMINATION DATE
		1987

2. Include employment information for the spouse, if applicable.

SALARY OR WAGES PER MONTH	NAME AND ADDRESS OF EMPLOYER

If the spouse is not currently employed, state the name and address of last employment, date of termination of employment, and amount of salary or wages per month.

SALARY OR WAGES PER MONTH	NAME AND ADDRESS OF EMPLOYER	TERMINATION DATE

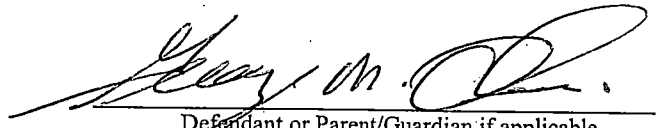
I do solemnly swear that the account by me delivered into this court with my application for counsel does contain a true and full account of all my real and personal estate, debts, credits and effects whatsoever without exception, which I or any person in trust for me have or at the time of my possession had, or am, or was, in any respect, entitled to, in possession, remainder or reversion and that I have not at any time since charges were made against me or before, directly or indirectly sold, leased, assigned or otherwise disposed of or made over, in trust for myself or otherwise, other than is mentioned herein.

I understand the appointment of counsel creates a claim against the assets and estate of the person who is provided counsel or the parents or legal guardians of a juvenile in an amount equal to the cost of representation less the amount paid to appointed counsel, the public defender office and/or the Commission on Indigent Defense. I understand that such claim shall be filed in the office of the Clerk of Court in the county where I, my child, or ward are assigned counsel, but that the filing of a claim shall not constitute a lien against my real or personal property unless, in the discretion of the court, part of all of such claim is reduced to judgment by appropriate order of the court after serving me with at least thirty (30) days notice that judgment will be entered.

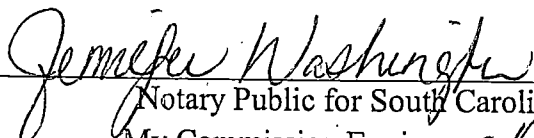
I understand that, pursuant to §17-3-30(b), I am required to pay a non-refundable \$40.00 application fee to the Clerk of Court for public defender services or other appointed counsel.

I am financially unable to employ counsel and request that counsel be assigned to represent me. I understand that I am entitled to at least thirty days' notice before a claim against me may be reduced to judgment, and I do hereby waive the right to such notice.

This _____ day of _____, 2019


Defendant or Parent/Guardian if applicable

Subscribed and sworn to before me this
4th day of April, 2019

 (L.S.)
Notary Public for South Carolina
My Commission Expires: March 8, 2008

The applicant's request for court-appointed counsel is hereby granted / denied.

Dated: _____

Judge/Clerk or Deputy Clerk

_____, South Carolina

WALYTB

Broad River

INMATE TRUST FUND ACCOUNT REPORT for SOUTH CAROLINA COURT FILING FEES

INSTRUCTIONS TO INMATE: Complete top portion then give to your mailroom. When returned from Accounting, you must mail this form with any payment to the Court.

By signing my name below, I am asking the Financial Accounting Office of the South Carolina Department of Corrections to complete this report. In accordance with SC Code of Laws §24-27-100 and 150, I authorize payment of the full filing fee. If I have insufficient funds in my account at this time to pay the court's full filing fee, I authorize SCDC to deduct the initial and subsequent payments until payment is completed.

INMATE NAME (print): GEORGE M. Adams

SCDC# 181283

INMATE SIGNATURE: *George M. Adams*

I plan to file this action in the SC County of Richland

The section below is for SCDC - Financial Accounting Branch's use ONLY.

- (1) Total deposits to inmate's account for preceding six months' period* \$ 0
- (2) Twenty percent (20%) of line-1 \$ 0
- (3) Account balance - current date \$ 3.91
- (4) PAYMENT AMOUNT **
(lesser of line 2 or line 3)
Enclosed check # — \$ 0

****NOTE to COURT:** If payment is for partial fee, Court must notify SCDC once case is accepted and filed. Send notice with case # and balance owed to address below. SCDC will NOT process any additional payments until notification is received from Court.

South Carolina Department of Corrections
Financial Accounting - Room 234
PO Box 21787
Columbia, SC 29221-1787

*Admission date is noted here if inmate incarcerated less than six months 1/18/19

Peggy Cowler

1/18/19

SCDC-FINANCIAL ACCTG
2019 JAN 18 AM 10:49
2019 APR -8 PM 1:47

State of South Carolina)
in the county of Richland)
George M. Adams, #181283)
Plaintiff,)

Magistrate Court
C/A No.:

2019CP400 2137

vs.)

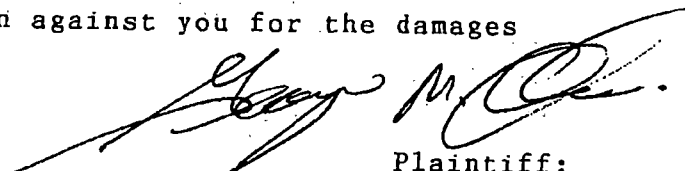
SUMMONS

Richland County Sheriffs Dept.)
Et Al., Defendants.)

2019 APR -8 PM 1:42
MAGISTRATE COURT

To the above named Defendants:

You are hereby summoned to serve upon the Plaintiff, George M. Adams, inmate housed at Broad River Correctional Institution 4460 Broad River Road, Columbia, South Carolina, 29210, an Answer to the Complaint which is hereby served upon you, within thirty (30) days and or as the court deem fit. If you fail to do so, Judgment by Default will be taken against you for the damages sought in this Action.



Plaintiff:
George M. Adams, #181283
Broad River Correc. Inst.
4460 Broad River Road
Columbia, S.C. 29210

Defendant(s):
Richland county Sheriff Department
Et Al.

4, April, 2019

2019 APR 16 PM 2:38
MAGISTRATE COURT
COLUMBIA, S.C.

State of South Carolina
in the county of Richland

George M. Adams, #181283
Plaintiff,

vs.

Richland County Sheriffs Dept.
Et Al., Defendants.

2019CP400 2137

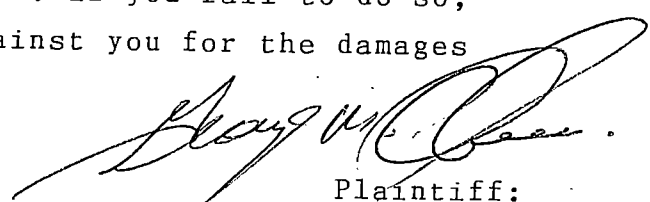
Magistrate Court
C/A No.:

SUMMONS

RICHLAND COUNTY
FILED
2019 APR 16 PM 2:39
JEANETTE W. MCBRIDE
CLERK

To the above named Defendants:

You are hereby summoned to serve upon the Plaintiff, George M. Adams, inmate housed at Broad River Correctional Institution 4460 Broad River Road, Columbia, South Carolina, 29210, an Answer to the Complaint which is hereby served upon you, within thirty (30) days and or as the court deem fit. If you fail to do so, Judgment by Default will be taken against you for the damages sought in this Action.



Plaintiff:

George M. Adams, #181283
Broad River Correc. Inst.
4460 Broad River Road
Columbia, S.C. 29210

Defendant(s):

Richland county Sheriff Department
Et Al.

4. April, 2019

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND)

CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

COMPLAINT

GEORGE M. Adams, # 181283

FALSE ARREST
FALSE IMPRISONMENT
PERJURY/MALICIOUS PROSECUTION

PLAINTIFF(S)
vs

ALLEN SLOAN

RICHARD A. HARPOOTIAN

JEFFERY P. Bloom

Phil BARLETT

JONATHAN GASSER

DAVID LAWRENCE

William B. NETTLES

DEFENDANT(S)

I, GEORGE M. Adams, # 181283

the plaintiff(s) in this civil action

do make the following claims:

1. I believe that the defendant(s),

ALLEN SLOAN, Phil BARLETT
DAVID LAWRENCE
RICHARD A. HARPOOTIAN
JONATHAN GASSER, William NETTLES
JEFFERY P. Bloom

is/are a resident(s) of Richland County, or this Complaint is properly filed in Richland County.

2. I make this complaint on the following:

FALSE ARREST, FALSE IMPRISONMENT AND PERJURY ON JUNE
17, 1992. SEE ATTACHED SUPPLEMENT COMPLAINT AND EXHIBITS
A - Q WITH TRIAL TRANSCRIPT VOLUMES I, II ALSO, MALICIOUS PROSECU-
TION

(Attach supplement if necessary)

3. I believe, because of the above information, that I am entitled to and do request a judgment for
\$ _____ and/or relief as below requested:

AS THE COURT DEEM NECESSARY

including any costs resulting in this action.

I STATE UNDER PENALTY OF PERJURY THAT THE ABOVE STATED FACTS ARE TRUE EXCEPT THOSE BASED ON MY BEST INFORMATION THAT I BELIEVE TO BE TRUE.

George M. Adams
Signature of Plaintiff/Attorney

2019 APR - 8 PM 4a

APR 15 PM 2:38
RICHLAND COUNTY

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

COMPLAINT

GEORGE M. Adams, # 181283

FALSE ARREST
FALSE IMPRISONMENT
PERJURY/MALICIOUS PROSECUTION

PLAINTIFF(S)
Vs

ALLEN SLOAN
Phil BARIETT
DAVID LAWRENCE

RICHARD A. HARPOOTIAN
JONATHAN GASSER
WILLIAM B. NETTLES
JEFFERY P. Bloom

DEFENDANT(S)

I, GEORGE M. Adams, # 181283

the plaintiff(s) in this civil action

do make the following claims:

1. I believe that the defendant(s),

ALLEN SLOAN, Phil BARIETT
DAVID LAWRENCE
RICHARD A. HARPOOTIAN
JONATHAN GASSER, WILLIAM NETTLES
JEFFERY P. Bloom

is/are a resident(s) of Richland County, or this Complaint is properly filed in Richland County.

2. I make this complaint on the following:

FALSE ARREST, FALSE IMPRISONMENT AND PERJURY ON JUNE
17, 1992. SEE ATTACHED SUPPLEMENT COMPLAINT AND EXHIBITS
A - Q WITH TRIAL TRANSCRIPT VOLUMES I, II ALSO, MALICIOUS PROSECUTION

(Attach supplement if necessary)

3. I believe, because of the above information, that I am entitled to and do request a judgment for \$ _____ and/or relief as below requested:

AS THE COURT DEEM NECESSARY

including any costs resulting in this action.

I STATE UNDER PENALTY OF PERJURY THAT THE ABOVE STATED FACTS ARE TRUE EXCEPT THOSE BASED ON MY BEST INFORMATION THAT I BELIEVE TO BE TRUE.

George M. Adams
Signature of Plaintiff/Attorney

2019 JUN 16 PM 2:39
RICHLAND COUNTY
CLERK OF COURT
JENNIFER W. HORRIDE
CLERK

State of South Carolina)
County of Richland)
George M. Adams, #181283)
Plaintiff,)
Richland County Sheriff Dept)
Et Al. Respondent.)
_____)

Magistrate Court
C/A No.: _____

VERIFIED COMPLAINT
JURY TRIAL DEMANDED

2019 APR 16 PM 2:38
JAMES L. HIGGINS
CLERK

2019 APR -8 PM 1:48
JAMES L. HIGGINS
CLERK

Attached Supplement

1. Plaintiff's Jurisdiction and Venue

This court has jurisdiction over this action pursuant South Carolina Code of Laws Title 15, subsection §15-78-10 and Magistrate Court Rule 4. South Carolina Constitution Article 1 Section 14; United States Constitution Amendment(s) 6, 14.

Retina L. Adams; Arrest Warrant

Prior to June 17, 1992, Retina L. Adams was booked into Richland County Detention Center for Armed Robbery. <see>(Exhibit A)

James Brown; 1st Statement

June 17, 1992, James Brown (co-defendant), submitted a typed and signed statement at 4:35 pm to Richland County Sheriff's Office Investigators Gene Mincey and Phil Bartlett. <see> (Exhibit B)

David Lawrence; Search Warrant

June 17, 1992 Investigator David Lawrence procure's a signed search warrant from Judge Womble at 5:47 pm. <see> (Exhibit C)

George M. Adams; Arrest Report

June 17, 1992, Investigators Phil Bartlett and Gene Mincey booked Adams for Armed Robbery at 6:45 pm <see> (Exhibit D)

James Brown; 2nd Statement

Richland County Sheriff Investigator David Wilson obtained a written statement from James Brown which he changed his story. <see> (Exhibit E).

June 18, 1992 Arrest Warrants;
David Lawrence Follow-up Report

Investigator Lawrence submitted a Richland County Sheriffs Dept. Investigative follow-up report June 17-18, 1992 on the Frost Ave., Homicide. In his report at 1500hrs, he stated that, "To obtained an arrest warrant for Adams for murder and a search warrant for Adams's residence at 2-c Roosevelt village apt.; Judge Womble signed both warrants." On June 18, 1992 he makes no reference to obtaining warrants for Adams. <see> (Exhibit F).

Joseph M. Leatherman; Follow-up Report

Investigator Leatherman submitted a Richland County Sheriff's Department criminal investigative division Investigative Report dated 06/17/92 at 0630 on case number 0617921034. His investigative follow-up reveals that, Judge Womble did not sign the warrants on the 18th of June, 1992. <see> (Exhibit G).

Preliminary Hearing

August 19, 1992, Barney Giese, solicitor for Richland Judicial Center represented the State on charges of Murder and Armed Robbery. Mr Giese during direct examination of Investigator Lawrence at <Tr.Pg 9-11, lines 1-19>, no arrest warrant exist issued by Judge Womble on June 17, 1992. Barry B. George did represent George M. Adams. During examination, Barry B. George. counsel for George Adams, blantly overlooked the Armed Robbery and Murder warrants dated June 18, 1992, and a search warrant signed with Judge Womble signature dated June 17, 1992, at 5:47pm <Tr.pg. 29-34, lines 1-7>. The Honorable Michael Davis binded over arrest warrants for Armed Robbery and Murder dated June 17, 1992, issued and signed by Judge Womble. <see> <Tr.pg. 77, lines 17-25>.

Indictments 92-GS-40-11316,17

October 15, 1992, Richland County Grand Jurors upon their oath returned solicitor Richard A. Harpootlian's Indictments True billed for the Frost Ave., Armed Robbery and Murder June 17, 1992. The arrest warrants dated and signed by Judge Womble on June 17, 1992, was not presented to the Grand Jurors. <see> (Exhibits F and H).

Letter from Rodney Patton

January 12, 1994, Richland County Public Defender Rodney Patton informed George Adams about Mr. Jeffrey P. Bloom response

concerning changing court appointed counsel, and on January 12, 1994, (co-defendant), James Brown gives a (3rd) statement. <see> (Exhibit I).

Plea Offer, Solicitor

April 11 through May, terms of Court, Jonathan Gasser Deputy Solicitor, Warren B. Giese and Richard A. Harpootlian informed defense counsel Barry B. George about the plea offer. <see> (Exhibit J).

Request for Preliminary Hearing
Appointment of Defense Counsel

May 11, 1994, Jeffrey P. Bloom, Chief Public Defender for Richlan County Public Defender office informed the Honorable Walter Jones to arrange a preliminary hearing on Armed Robbery and Murder warrants D-369126,27. May 11, 1994, William Nettles was appointed as defense counsel for George M. Adams against above charges. The motion requesting for the preliminary hearing was never conducted. So how was the warrants binded over to General Sessions? <see> (Exhibit K).

Trial, Volumes I,II
From Jury Trial

June 20-23rd, 1994, Deputy Solicitor Jonathan Gasser called defense counsel William Nettles and Geore M. Adams to stand trial before the Honorable Henry McKellar, Judge and Jury against indictments 92-GS-40-11316,17, signed by Richard A. Harpootlian on October 15, 1992. Volume I, at cover page, through transcript pages 1-9, lines 1-12.

June 20, 1994, Phil Bartlett during [in camera], who is the Affiant on the June 18, 1992, Arrest warrants, testified at Tr.Pg. 54-64 Arrest Warrants had been acquired for George M. Adams on June 17, 1992. David Lawrence next was called to testify at Tr.pg. 88-115, lines 1-10, who is the Affiant on the June 17, 1992 Search Warrant, stated, "Judge Womble signed the search warrant and arrest warrants on June 17, 1992." Tuesday June 21, 1994, Joseph M. Leatherman was called and never questioned about his follow-up report at Tr.Pg. 314-319, lines 1-15. Wednesday June 22, 1994, in the presence of the jury, David Lawrence again stated "Judge Womble signed both warrants June 17, 1992", at Tr.pg. 409-418, lines 1-21. Phil Bartlett was called to testify before the jury next, and stated, that "he was not present with the officers when the arrest warrants was signed. Lt. Lawrence obtained the warrants", at Tr.pg 419-440, lines 1-25.

Letter; Cindy Soto

October 10,1996, Cindy Soto, Office Manager for W.H. Womble, informed George M. Adams that the June 17,18, 1992 Search and Arrest warrants could not be found in the Judge's Files. <see> (Exhibit L).

Letter; Gloria W. Alston

January 16, 1998, Gloria W. Alston, Upper Township Magistrate Samuel Peay, Criminal Law Clerk returned the arrest warrants stamped stating that the judge doesn't have jurisdiction for the charges. <see> (Exhibit M).

Letter; Seberina Guess

February 2, 2007, Upper Township Magistrate W.H. Womble summary law clerk Seberina Guess informed George M. Adams, Post-Conviction Relief counsel Charles T. Brooks, III that Gloria Alston no longer worked with the office. <see> (Exhibit N)

Letter; Mark A. Keel

August 13, 2007, South Carolina Law Enforcement Division Major Mark A. Keel, Esq., was informed and Responded to George M. Adams, about this complaint. <see> (Exhibit O)

Letter; Lawrence E. Gainey

August 17, 2009, South Carolina Law Enforcement Division Lawrence E. Gainey, Major over Investigative Services referred the problem to the court. <see> (Exhibit P).

Letter; Chris A. Pauling

October 31, 2013, Chris A. Pauling requested for the June 17, 1992, signed Arrest Warrants from Judge Womble. <see> (Exhibit Q).

RELIEF SOUGHT

Plaintiff commence this present action alleging false arrest and imprisonment, perjury and Malicious prosecution;

Plaintiff re-allege and incorporate by reference to above Paragraphs/Exhibits A-Q and Trial Transcripts Volumes I, II;

The Defendant(s), violated the Plaintiff's State and Federal Constitutional Rights, and

Summary Judgment is not appropriate because a genuine issue of material fact exists as to whether there was probable cause for Plaintiff's arrest.

Richland County Sheriff's Department committed false arrest and imprisonment.

PRAYER FOR RELIEF

The Defendant(s), held liable for damages because there was no neutral and detached magistrate's determination of Probable Cause.

The Sheriff's Department held liable for compensatory damages in the amount of \$100,000.00 for false arrest.

The Defendant(s), held liable for Compensatory damages in the amount of \$100,000.00 for false imprisonment.

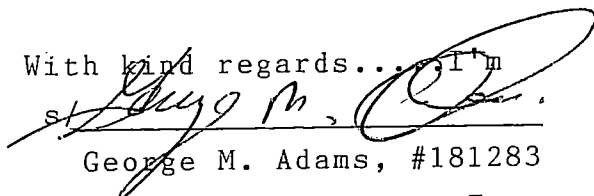
The Plaintiff request seeking a Jury Trial on ALL issues be granted.

Any additional relief this Court deems, just, proper, and Equitable.

PLEASE NOTE:

I Declare under the penalty of perjury that the foregoing is true and correct to the best of my understanding and my belief.

With kind regards.....I'm



George M. Adams, #181283
Broad River Correc. Inst.
4460 Broad River Road
Columbia, S.C. 29210

Date: 4, April, 2019
Columbia, South Carolina 29210

State of South Carolina)
County of Richland)

Magistrate Court

George M. Adams, #181283)
Plaintiff,)

Civil Action

vs.)

Allen Sloan, R.C.S.D. (Sheriff))

Phil Bartlett, R.C.S.D. Inv.)

David Lawrence, R.C.S.D. Inv.)

Richard A. Harpootlian, (Sol.))

Jonathan Gasser, (Solicitor))

William "Bill" Nettles)

Jeffery P. Bloom, (Plaintiff))

Defendant)

NOTICE OF HEARING

We will
send
hearing
notice and
transport order

TO:

Above named defendant
above entitled action
at _____ O'clock AM/

_____ in the
_____, 2019

YOU are notified
Richland County Court

_____ at the informed time.

Signed this _____ Day of _____, 2019

Admin. Judge (Civil)

State of South Carolina)
County of Richland)
George M. Adams, #181283)
Plaintiff,)

Magistrate Court

C/A No.: _____

vs.

REQUEST FOR A HEARING

Allen Sloan, R.C.S.D. Sheriff)
Phil Bartlett, R.C.S.D. INV.)
David Lawrence, R.C.S.D. INV.)
Richard A. Harpootlian, (Sol.))
Jonathan Gasser, R.C.S.D. (SOL.))
William Nettles, Public Defender)
Jeffery P. Bloom, Public Defender)
Defendants.)

(Address) Plaintiff: 4460 Broad River Road, Columbia, S.C.
29210; (Broad River Correctional Institution).

(Address) Attorney of Defendant(s): Unknown

Contested Yes No

TYPE OF CASE: False Arrest / False imprisonment, Perjury,
And Malicious Prosecution.

TIME NEEDED: 15 Minutes

Days/Time Unavailable: Saturday and Sunday

Comments and Issues: Defendant(s) violated Plaintiff's Fourt
(4th) Amendment Rights.

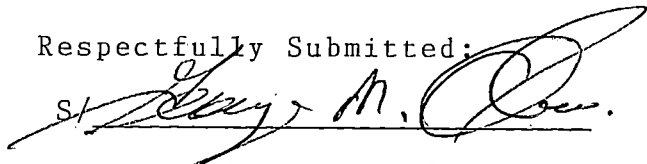
VERIFICATION

I have read the foregoing Complaint and hereby verify that the matters alleged therein are true except as to matters alleged on information and belief and as to those I believe them to be true.

RECEIVED
2019 APR 16 PM 2:39
JENNIFER W. MOSBIDE
CLERK

I Certify under penalty of perjury that the foregoing is true and correct.

Respectfully Submitted:



George M. Adams, #181283
Broad River Correc. Inst.
4460 Broad River Road
Columbia, S.C. 29210

Date: 4, April, 2019
Columbia, S.C. 29210

George M Adams #181283
Broad River Cor Ins/MLT-2095-A
4460 Broad River Road
Columbia, SC 29210

George M. Adams, #181283
Broad River Correctional Institution
4460 Broad River Road
Columbia, South Carolina 29210

Date: 4, April, 2019

Amy Handcock, Clerk of Court
Waverly Magistrate
C/O Judge C.W. Streater
2712 Middleburg Dr. (Suite 106)
Columbia, South Carolina 29210

RECEIVED

AUG 08 2019

SC Court of Appeals

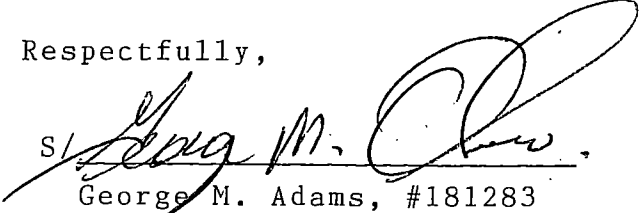
RE: Summons/Complaint 2019CP4002137

Dear Clerk:

Enclosed is the Original and one copy of a Civil Suit to be filed in your office. Therefore, would you please file stamp both Complaint Motions, upon returning the copy to me in the Self-Enclosed addressed envelope.

Thanks in Advance!

Respectfully,


George M. Adams, #181283

Broad River Correc. Inst.
4460 Broad River Road
Columbia, S.C. 29210

cc: File

George M. Adams, # 181283
Broad River Correctional Inst.
4460 Broad River Road
Columbia, South Carolina 29210

Date: 4. Apr. 1, 2019

Richland County Sheriff
C/O R.C.S.D
5623 Two Notch Road
Columbia, S.C. 29223

RE: SUMMONS/COMPLAINT 2019CP4002137

Enclosed and served upon your office is a Summons, Affidavit,
Complaint, along with an Original copy of the Plaintiff's
Exhibits and Certificate of Service.

RECEIVED

AUG 08 2019

SC Court of Appeals

Respectfully,



George M. Adams, #181283
Broad River Correc. Inst.
4460 Broad River Road
Columbia, S. Carolina

29210

Copy

GEORGE M. ADAMS, 181283
BROAD RIVER CORRECTION INSTITUTION
4460 BROAD RIVER ROAD
COLUMBIA, S.C. 29210

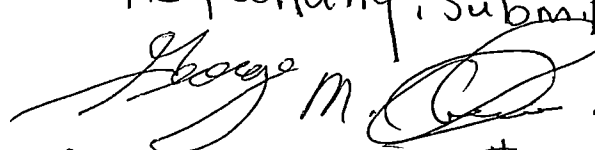
DATE 8-2-19

RECEIVED
AUG 08 2019
SC Court of Appeals

HONORABLE V. CLAIRE ALLEN, DEPUTY CLERK
SOUTH CAROLINA COURT OF APPEALS
POST OFFICE BOX 11629
COLUMBIA, S.C. 29211

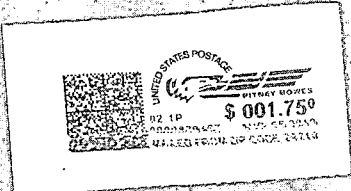
RE: GEORGE M. ADAMS V. RCSD
APPELLATE CASE NO.: 2019-001175

DEAR HON. CLERK:
ENCLOSED YOU FIND A COPY OF THE ORIGINAL PROPOSED
COMPLAINT WHICH WAS FILED IN THE RICHLAND COUNTY
COURT OF COMMON PLEAS.

Respectfully, Submitted

GEORGE M. ADAMS, #181283

CC: RCSD

George M. Adams, 181283
BROAD RIVER CORRECTION INSTITUTION
4460 BROAD RIVER ROAD
Columbia, S.C. 29210



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V. CLAIKE ALLEN, Deputy CLERK
The South CAROLINA COURT OF APPEALS
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Columbia, S.C. 29201 - 29211