

John D. Alexander, #194748  
Perry Correctional Institution  
430 Oaklawn Road  
Pelzer, South Carolina 29669

May 20, 2020

**RECEIVED**  
MAY 29 2020  
SC Court of Appeals

The South Carolina Court of Appeals  
Clerk's Office  
Post Office Box 11529  
Columbia, South Carolina 29211

Re: John Douglas Alexander, #194748 v. Alan M. Wilson; and  
The State

Appellate Case No. 2020-000679  
Lower Court Case No. ~~2019~~ 2020-CP-42-01021

Dear Clerk:

Again, I am send your office a copy of the Order of Dismissal being challenged on appeal, a Civil Action Coversheet, Summons, Complaint, and Affidavit of the lower court record.

Because this is the third time that I am having to send your office the exact same materials plus, other inmates at this institution have recently experience the same problems with attempting to submit legal documents before your office, I have a reasonable suspicion to believe that some one inside

your office is either illegally disposing of our legal documents, or in the alternative, grossly mismanaging incoming legal documents.

In either event, I am filing a formal complaint pursuant to Statute Section 14-8-110 S.C. Code of Law before The South Carolina Supreme Court.

Respectfully Submitted  
John Alexander

# Spartanburg County

Spartanburg County Court House  
180 Magnolia Street  
P. O Box 3483  
Spartanburg, SC 29304-3483



Phone (864) 596-2591  
Fax (864) 596-2259

**Amy W. Cox**  
Clerk of Court

**Gail Moffitt**  
Assistant Clerk of Court

March 17, 2020

John Alexander #194748  
Perry Correctional Inst.  
430 Oaklawn Rd, 1B223  
Pelzer SC 29669

Dear Mr Alexander,

Enclosed is your filing received by our office, along with the order denying the motion to proceed In Forma Pauperis. The case has been dismissed and if you choose to re file, a \$150 filing fee will be required. A Gross Negligence petition cannot be filed under a 599.

Please let us know if we can be of further assistance to you.

Sincerely, TMD

STATE OF SOUTH CAROLINA

COUNTY OF Spartanburg

John Douglas Alexander, #194748  
Plaintiff(s)

vs.

Alan M. Wilson, Attorney General; and  
The State of South Carolina Defendant(s)

Submitted By: John Alexander Pro se  
Address: Perry Correctional Institution,  
430 Oaklawn Road, Pelzer, South  
Carolina 29669

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2020-CP-42-01021

SC Bar #: \_\_\_\_\_  
Telephone #: \_\_\_\_\_  
Fax #: \_\_\_\_\_  
Other: \_\_\_\_\_  
E-mail: \_\_\_\_\_

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. This form is NOT required to be filed in E-Filed Cases.

DOCKETING INFORMATION (Check all that apply)

\*If Action is Judgment/Settlement do not complete

- JURY TRIAL demanded in complaint.  NON-JURY TRIAL demanded in complaint.
- This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is exempt from ADR. (Proof of ADR/Exemption Attached)

NATURE OF ACTION (Check One Box Below)

- |  |   |   |  |
|--|---|---|--|
| <p><b>Contracts</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Constructions (100)</li> <li><input type="checkbox"/> Debt Collection (110)</li> <li><input type="checkbox"/> General (130)</li> <li><input type="checkbox"/> Breach of Contract (140)</li> <li><input type="checkbox"/> Fraud/Bad Faith (150)</li> <li><input type="checkbox"/> Failure to Deliver/Warranty (160)</li> <li><input type="checkbox"/> Employment Discrim (170)</li> <li><input type="checkbox"/> Employment (180)</li> <li><input type="checkbox"/> Other (199)</li> </ul> <p><b>Inmate Petitions</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> PCR (500)</li> <li><input type="checkbox"/> Mandamus (520)</li> <li><input type="checkbox"/> Habeas Corpus (530)</li> <li><input checked="" type="checkbox"/> Other (599)</li> </ul> <p><b>Gross Negligence</b></p> | <p><b>Torts - Professional Malpractice</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Dental Malpractice (200)</li> <li><input type="checkbox"/> Legal Malpractice (210)</li> <li><input type="checkbox"/> Medical Malpractice (220)</li> <li>Previous Notice of Intent Case #<br/>20 <u>-NI-</u></li> <li><input type="checkbox"/> Notice/ File Med Mal (230)</li> <li><input type="checkbox"/> Other (299)</li> </ul> <p><b>Administrative Law/Relief</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Reinstate Drv. License (800)</li> <li><input type="checkbox"/> Judicial Review (810)</li> <li><input type="checkbox"/> Relief (820)</li> <li><input type="checkbox"/> Permanent Injunction (830)</li> <li><input type="checkbox"/> Forfeiture-Petition (840)</li> <li><input type="checkbox"/> Forfeiture-Consent Order (850)</li> <li><input type="checkbox"/> Other (899)</li> </ul> <p><b>Special/Complex /Other</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Environmental (600)</li> <li><input type="checkbox"/> Automobile Arb. (610)</li> <li><input type="checkbox"/> Medical (620)</li> <li><input type="checkbox"/> Other (699)</li> <li><input type="checkbox"/> Sexual Predator (510)</li> <li><input type="checkbox"/> Permanent Restraining Order (680)</li> <li><input type="checkbox"/> Interpleader (690)</li> <li><input type="checkbox"/> Pharmaceuticals (630)</li> <li><input type="checkbox"/> Unfair Trade Practices (640)</li> <li><input type="checkbox"/> Out-of State Depositions (650)</li> <li><input type="checkbox"/> Motion to Quash Subpoena in an Out-of-County Action (660)</li> <li><input type="checkbox"/> Pre-Suit Discovery (670)</li> </ul> | <p><b>Torts - Personal Injury</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Conversion (310)</li> <li><input type="checkbox"/> Motor Vehicle Accident (320)</li> <li><input type="checkbox"/> Premises Liability (330)</li> <li><input type="checkbox"/> Products Liability (340)</li> <li><input type="checkbox"/> Personal Injury (350)</li> <li><input type="checkbox"/> Wrongful Death (360)</li> <li><input type="checkbox"/> Assault/Battery (370)</li> <li><input type="checkbox"/> Slander/Libel (380)</li> <li><input type="checkbox"/> Other (399)</li> </ul> <p><b>Judgments/Settlements</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Death Settlement (700)</li> <li><input type="checkbox"/> Foreign Judgment (710)</li> <li><input type="checkbox"/> Magistrate's Judgment (720)</li> <li><input checked="" type="checkbox"/> Minor Settlement (730)</li> <li><input type="checkbox"/> Transcript Judgment (740)</li> <li><input type="checkbox"/> Lis Pendens (750)</li> <li><input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760)</li> <li><input type="checkbox"/> Confession of Judgment (770)</li> <li><input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780)</li> <li><input type="checkbox"/> Incapacitated Adult Settlement (790)</li> <li><input type="checkbox"/> Other (799)</li> </ul> | <p><b>Real Property</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Eminent Domain (400)</li> <li><input type="checkbox"/> Condominium (410)</li> <li><input type="checkbox"/> Foreclosure (420)</li> <li><input type="checkbox"/> Mechanic's Lien (430)</li> <li><input type="checkbox"/> Partition (440)</li> <li><input type="checkbox"/> Possession (450)</li> <li><input type="checkbox"/> Building Code Violations (460)</li> <li><input type="checkbox"/> Other (499)</li> </ul> <p><b>Appeals</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Arbitration (900)</li> <li><input type="checkbox"/> Magistrate-Civil (910)</li> <li><input type="checkbox"/> Magistrate-Criminal (920)</li> <li><input type="checkbox"/> Municipal (930)</li> <li><input type="checkbox"/> Probate Court (940)</li> <li><input type="checkbox"/> SCDOT (950)</li> <li><input type="checkbox"/> Worker's Comp (960)</li> <li><input type="checkbox"/> Zoning Board (970)</li> <li><input type="checkbox"/> Public Service Comm. (990)</li> <li><input type="checkbox"/> Employment Security Comm (991)</li> <li><input type="checkbox"/> Other (999)</li> </ul> |
|--|---|---|--|

Submitting Party Signature: John Alexander

Date: 3/12/20

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

STATE OF SOUTH CAROLINA )  
 )  
 )  
COUNTY OF Spartanburg. )

IN THE COURT OF COMMON PLEAS  
SEVENTH CIRCUIT

John Douglas Alexander, #194748, )  
 )  
 )  
Plaintiff, )

Civil Action No. 2020CP4201021

vs. )

SUMMONS

Alan McCroy Wilson, Attorney )  
 )  
 )  
General; and The State of )  
 )  
 )  
South Carolina, )  
 )  
 )  
Defendants. )

2020 MAR 16 PM 1:29  
VOID CLOCKED IN ERROR  
CLERK OF COURT  
SPARTANBURG COUNTY  
-AMY W. COX

FILED

T.O: Mr. Alan M. Wilson, Attorney General For South Carolina

A lawsuit has been filed against you.

Within Thirty (30) days after service of this Summons on you, you must serve on the Plaintiff an Answer attached to the Complaint pursuant to Rule 12 Fed. R. Civ. P. The Answer must be served on the Plaintiff whose name and address are:

John Douglas Alexander  
Perry Correctional Institution  
430 Oaklawn Road; 1B 223  
Pelzer, South Carolina 29669

If you fail to respond, Judgment by default will be entered

against you for the relief demanded in the Complaint. You must also file your Answer with the Court.

Dated:

CLERK OF COURT

---

Signature of Clerk or  
Deputy Clerk

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF Spartanburg. )

IN THE COURT OF COMMON PLEAS  
SEVENTH CIRCUIT

John Douglas Alexander, #194748, )  
 )  
Plaintiff, )  
 )

Civil Action No. 2020CP4201021

vs. )

COMPLAINT

Mr. Alan M. Wilson, Attorney )  
 )  
General and The State of )  
South Carolina, )  
 )  
Defendants. )

**FILED**  
2020 MAR 16 PM 1:15  
VOID CLOKED IN IENOR  
CLERK OF COURT  
SPARTANBURG COUNTY  
AMY W. COX

COMES, John D. Alexander, Plaintiff above a State prisoner currently residing at the Perry Correctional Institution, 430 Oaklawn Road, PO Box 115, Pelzer, South Carolina 29669 with a Civil Complaint pursuant to Statute Section 15 Tort, SC Code Ann. (1976). As well as all other applicable State and Federal Rules, Statutes, Constitutions, Laws, etc. against the above named Defendants.

I. The Plaintiff asserts that on 10 July 2018 and again on 29 May 2019 he attempted to informally resolve this civil matter with the Defendants absent an Order from a civil Court having jurisdiction over the legal matter. See Attachment # 1 and # 2

B. That on 6 June 2019, the Defendants refused to honor or respect clearly established State and Federal precedent in connection with Plaintiff's civil complaint. See Attachment # 3

### III. PARTIES:

Plaintiff/s: John D. Alexander  
Perry Correctional Institution  
430 Oaklawn Road, 03A115  
Pelzer, South Carolina 29669

Defendant/s: Mr. Alan M. Wilson, Attorney General  
Office of the Attorney General  
Post-Office Box 11549  
Columbia, South Carolina 29211

2020 MAR 16 PM 4:19  
**NOT RECORDED IN ERROR**  
CLERK OF COURT  
SPARTANBURG COUNTY  
AMY W. COX

**FILED**

### STATEMENT OF CLAIM

That on 6 June 2019 the Defendants in their individual and official capacity knowingly, willfull and wanton in bad faith committed and continues to commit acts of Gross Negligence and misconduct or indulge in practices which tends to pollute the administration of Justice or bring this Court of Common Pleas and the legal profession into disrepute by failing to disclose to the Plaintiff vital tangible material evidence critical, trustworthy, pertinent and conducive to establishing and proving his burden of proof in his currently pending Post-Conviction Relief proceeding. See 2018-CP-42-3181.

### IV. RELIEF:

Pursuant to Evans v. State, 363 S.C. 495, 611 S.E. 2d 510 (2005); 2017 S.C. H.B. 3870; and 2017 S.C. H.B. 3880 the

Plaintiff respectfully requests that this Honorable Court of Common Pleas grant the Complaint. And Order the Defendants to produce to the Plaintiff the Grand Jury Impanelment Documents, including the State's petition, supporting materials, and the impaneling Judge's Order which led up to the November 2006 True Bill. And grant any other relief it deem Just and proper. See State v. Ward, 2019 WL 2289253.

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

Signed this 12 day of March, 2020.

Respectfully Submitted,  
John Alexander  
Plaintiff Pro se

AMY W. COX  
CLERK OF COURT  
SPARTANBURG COUNTY

VOID CLOKED AN ERROR  
2020 MAR 11 10:18

FILED

STATE OF SOUTH CAROLINA )  
COUNTY OF SPARTANBURG. )

IN THE COURT OF COMMON PLEAS  
SEVENTH CIRCUIT

John Douglas Alexander, #194748, )  
Plaintiff, )

Civil Action No. 2020CP4201021

vs. )

AFFIDAVIT OF SERVICE

Mr. Alan McCroy Wilson, Attorney )  
General; and The State of )  
South Carolina, )  
Defendants. )

**FILED**  
2020 MAR 16 PM 4:13  
CLERK OF COURT  
SPARTANBURG COUNTY  
H. W. COX  
**VOID CLERK'S OFFICE**

I, John Alexander, Plaintiff above certify that I sent the original  
Summons and Complaint United States Postal Services, prepaid, to  
Mr. Alan M. Wilson, Attorney General, Office of the Attorney General,  
Post Office Box 11549, Columbia, SC 29211, this 12 day of March,  
2020

Respectfully Submitted,  
John Alexander

Sworn and Subscribed  
this 12 day of March, 2020  
Jamua Conwell

Notary Public  
My Commission Expires September 25, 2023

**RECEIVED**

MAR 12 2020

P.C.I. MAILROOM

RECEIVED  
MAY 29 2020  
SC Court of Appeals

STATE OF SOUTH CAROLINA, )  
 )  
COUNTY OF Spartanburg )  
 )  
John Douglas Alexander )  
Plaintiff )

IN THE COURT OF COMMON PLEAS  
7th JUDICIAL CIRCUIT  
MOTION AND AFFIDAVIT TO  
PROCEED IN FORMA PAUPERIS

vs. )  
 )  
Mr. Alan M. Wilson, Attorney )  
General; The State of South )  
Carolina )  
Defendant. )

FILE NO. 2020-CP-42-01021

I, John Alexander 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.

RECEIVED  
MAR 12 2020

Sworn to and Subscribed before me )  
this 12 day of March, 2020 )  
Tamara Conwell )  
Notary Public for South Carolina )  
My Commission expires September 25, 2023 )

John Alexander  
Signature of Plaintiff or  
Person Filing Complaint on Behalf of  
Plaintiff

P.C.I. MAILROOM

2020 MAR 17 PM 3:08  
FILED  
CLERK OF COURT  
SPARTANBURG COUNTY  
AMY W. COX

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 cost.
- Leave is *denied* to proceed in forma pauperis.

Dated: March 17, 2020  
Spartanburg, South Carolina

[Signature]  
JUDGE/CLERK OF COURT

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

John Alexander, #194748  
erry Correctional Inst.  
130 Oaklawn Rd., 1B121  
elzer, SC 29669



U.S. POSTAGE >> PITNEY BOWES



0.80  
2020

The South Carolina Court of Appeals  
Clerk's Office  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED**

MAY 20 2020

P.C.I. MAILROOM

**RECEIVED**

MAY 29 2020

SC Court of Appeals  
LEGISLATIVE