

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM SPARTANBURG COUNTY
COURT OF COMMON PLEAS

Honorable TMD

Case No. 2020-CP-42-01021

Appellate Case No. 2020-000679

RECEIVED
JUL 07 2020
SC Court of Appeals

John Douglas Alexander, #194748,

Appellant,

vs.

Alan M. Wilson; and The State,

Respondent.

DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following be included in the Record on Appeal:

1. Order of March 17, 2020
2. Order of April 30, 2020
3. Order of May 15, 2020
4. Complaint
5. Order of November 21, 2011
6. Letter to Alan Wilson dated July 10, 2018
7. Motion For Discovery filed November 14, 2018

8. Letter to Alan Wilson dated May 29, 2019
9. Letter from Annalisa, Program Assistant
10. Motion For Discovery
11. Request For Discovery

I certify that this Designation contains no matter which is irrelevant to this appeal.

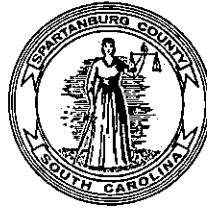
Dated ~~June~~^{July} 2, 2020

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

1

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

#2



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

April 30, 2020

John Douglas Alexander, 194748
Perry Correctional Institution
430 Oaklawn Road
Pelzer SC 29669

Re: John Alexander, #194748 v. Alan Wilson
Appellate Case No. 2020-000679

Dear Mr. Alexander:

Upon reviewing your notice of appeal, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter or your appeal will be dismissed:

- The notice of appeal is not accompanied by the order(s) and/or judgment(s) challenged on appeal.
- A proof of service showing a copy of the notice of appeal has been sent to the clerk of the lower court.

Very truly yours,

V. Claire Allen

CLERK

cc: Alan McCrory Wilson, Esquire



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

April 30, 2020

John Douglas Alexander, 194748
Perry Correctional Institution
430 Oaklawn Road
Pelzer SC 29669

Re: John Alexander, #194748 v. Alan Wilson
Appellate Case No. 2020-000679

Dear Mr. Alexander:

This Court has received your notice of appeal, and the case has been assigned the appellate case number that appears above. Please use this number on all future correspondence relating to this matter.

All parties to this matter are advised that all filings must comply with the requirements of Rule 267 of the South Carolina Appellate Court Rules (SCACR). The SCACR are available online at www.sccourts.org/courtreg. Additionally, any filings submitted by counsel admitted in South Carolina must include counsel's bar number.

The attention of the parties is directed to the order relating to the inclusion of personal data identifiers and other sensitive information in documents filed with the Supreme Court of South Carolina and the South Carolina Court of Appeals. The order can be found at www.sccourts.org/courtOrders/displayOrder.cfm?orderNo=2014-04-15-02. Please note that the responsibility for insuring that information is redacted or sealed as required by this order rests with counsel and the parties. This office will *not* review

filings for redaction or to determine if materials should be sealed.

This is to advise that the title in the above matter has been changed to read as follows:

John Douglas Alexander, #194748, Appellant,

v.

Alan M. Wilson and State, Respondents.

All future records in this matter should be changed to reflect this title. If you have any questions, please do not hesitate to contact this office.

Very truly yours,

V. Claire Allen

CLERK

cc: Alan McCrory Wilson, Esquire

3



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

May 15, 2020

John Douglas Alexander, 194748
Perry Correctional Institution
430 Oaklawn Road
Pelzer SC 29669

Re: John Alexander, #194748 v. Alan Wilson
Appellate Case No. 2020-000679

Dear Mr. Alexander:

The Court is in receipt of your material dated May 6, 2020 and is presumed to be in response to the Court's letter dated March 30, 2020. Your letter stated that you enclosed the Order of Dismissal being challenged on appeal, Civil Action Coversheet, Summons, Complaint, and Affidavit of the lower court record. However, these documents were not enclosed and the order of dismissal is still outstanding. This deficiency must be corrected within ten (10) days from the date of this letter or your appeal will be dismissed.

Very truly yours,

V. Claire Allen

CLERK

cc: Alan McCrory Wilson, Esquire

4

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

REAL PROPERTY
 CLAIM & LIEN (400)
 CONDEMNATION (410)
 EMINENT DOMAIN (420)
 MECHANIC'S LIEN (430)
 PARTITION (440)
 POSSESSION (450)
 BUILDING CODE VIOLATION (460)
 OTHER (499)

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.)

FILED
2020 MAR 16 PM 11:28
VOID CLOCKED IN ERROR
CLERK OF COURT
SPARTANBURG COUNTY
AMY W. COX

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

Civil Action No. 2020CP4201021

COMPLAINT

FILED
2020 MAR 16 PM 1:20
VOID CLOCKED IN ERROR
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, C3A 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 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

FILED
2020 MAR 16 PM 4:13
NOT RECORDED IN ERROR
CLERK OF COURT
SPARTANBURG COUNTY
AMY W. COX

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

FILED
2020 MAR 13 PM 4:13
VOID, CLOKED IN ERROR
CLERK OF COURT
SPARTANBURG COUNTY
AMY W. COX

STATE OF SOUTH CAROLINA)
)
COUNTY OF SPARTANBURG.)

IN THE COURT OF COMMON PLEAS
SEVENTH CIRCUIT

John Douglas Alexander, #194748,)
)
Plaintiff,)
)
vs.)
)
Mr. Alan McCroy Wilson, Attorney)
)
General; and The State of)
)
South Carolina,)
)
Defendants.)

Civil Action No. 2020CP4201021

AFFIDAVIT OF SERVICE

FILED
2020 MAR 16 PM 4:13
CLERK OF COURT
SPARTANBURG COUNTY
JIMMY W. COX
VOID CLERKED IN ERROR

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
Jamara Conwell

Notary Public
My Commission Expires ~~September 25, 2023~~ My Commission Expires

RECEIVED

MAR 12 2020

P.C.I. MAILROOM

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 Caswell)
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

CLERK OF COURT
SPARTANBURG COUNTY
AMY W. COX

2020 MAR 17 PM 3:08

FILED

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.

STATE OF SOUTH CAROLINA
COUNTY OF SPARTANBURG

IN THE COURT OF COMMON PLEAS
SEVENTH JUDICIAL CIRCUIT

John Douglas Alexander, # 194748
Petitioner,

vs.

State of South Carolina
Respondent.

ORDER FOR PRODUCTION OF
GRAND JURY IMPANELMENT
DOCUMENTS

2010-CP-42-2428

M. HOPE BLANCHARD
CLERK OF COURT

2011 NOV 21 AM 11:12

FILED
CLERK OF COURT
SPARTANBURG COUNTY

The Petitioner, John D. Alexander, moved this Court on May 26, 2011, Order that copies of the grand jury impanelment documents, including the State's petition, supporting materials, and the impaneling Judge's Order, which led to a tru bill on November 27, 2006, be produced to him. This matter was heard on June 15, 2011. At that time, this Court requested a Brief from Petitioner on the issue of production of grand jury impanelment documents, particularly with regard to whether our Supreme Court's decision in State v. Gentry, 363 S.C.93, 610 S.E.2d 494 (2005), acts as a prohibition against the production of such documents.

After hearing the arguments of the Petitioner and Respondent, along with reviewing the Plaintiff's Brief, I make the following finding of fact:

The Supreme Court addressed this very issue in Evans v. State, 363 S.C. 495, 611 S.E.2d 510 (2005), which was filed almost one month after its decision in Gentry. In Evans, the Supreme Court held:

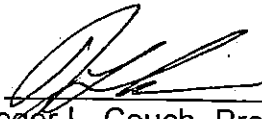
[W]e conclude impanelment documents, including the State's petition, supporting materials, and the impanelment judge's Order, may be released to a defendant prior to trial upon a timely request or to an applicant in a PCR hearing ... Release of the documents may be appropriate because (A) Section 14-7-1770 is not a complete prohibition on the release of the information; (B) release of the documents usually

is not prohibited by secrecy provisions or other concerns following the issuance of a true bill of indictment; and (C) a defendant has the right to review the documents to determine whether to timely challenge the legality of the state grand jury which indicted him.

Evans, 610 S.E.2d at 504 (emphasis added).

IT IS THEREFORE ORDERED that the grand jury impanelment documents, including the State's petition, supporting materials, and the impaneling Judge's Order, which led to a true bill on November 27, 2006, shall be produced to petitioner.

IT IS SO ORDERED.



Roger L. Couch, Presiding Judge
Seventh Judicial Circuit

November 21, 2011

Spartanburg, South Carolina

FILED
CLERK OF COURT
SPARTANBURG COUNTY
2011 NOV 21 AM 11:12
M. HOPE BLACKLEY

Attachment #6

John Alexander, #194748
Department of Corrections
386 Redemption Way
McCormick, SC 29899

July 10, 2018

Alan Wilson, Attorney General
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211

RE: Grand Jury Impanelment Documents

Dear Mr. Wilson:

Please send me complete copies of the grand jury impanelment documents, including the State's petition, supporting materials, and the impaneling Judge's Order, which led to a true bill on November 27, 2006. Also, please send me a true copy of the indictment itself bearing the True Seal pursuant to Article I Section 18 South Carolina Constitution.

Thank you.

John Alexander

Sworn and Subscribed
this 10 day of July, 2018
Jeff Frankl
Notary Public For South Carolina
My Commission Expires 12-16-2019.

#7

STATE OF SOUTH CAROLINA)
)
COUNTY OF SPARTANBURG)

IN THE COURT OF COMMON PLEAS

John D. Alexander, #194748,)
Applicant,)

Civil Action No. 2018 CP4203181

vs.

MOTION FOR DISCOVERY

State of South Carolina,)
Respondent,)

TO: Respondent and Attorney for Respondent

Pursuant to Rule 26 and 34 SCRPC and Rule 5, Rules of Criminal Procedure, the Applicant in the above captioned matter requests the disclosure of the following evidence to the Applicant by the Respondent:

- 1.) The Grand Jury Impanelment Documents, including;
- 2.) The State's Petition;
- 3.) Supporting Materials; and
- 4.) The impaneling Judge's Order, which led to a true bill on November 27, 2006.

2018 NOV 14 AM 10:41
M. HOPE BLACKLEY
CLERK OF COURT
CLERK OF COURT

Dated 11/9/18.

Respectfully Submitted,
John Alexander

CLERK OF COURT
SOUTH CAROLINA COUNTY
2018 NOV 14 AM 10:41
M. HOPE BLACKLEY

STATE OF SOUTH CAROLINA)
)
COUNTY OF SPARTANBURG)

IN THE COURT OF COMMON PLEAS

John D. Alexander, #194748,)
Applicant,)

Civil Action No. 2018 CP 4203181

vs.)

AFFIDAVIT OF SERVICE


State of South Carolina,)
Respondent.)

I, John D. Alexander, Applicant above sent a copy of the Motion For Discovery United States Postal Service, prepaid, to Alan Wilson, Attorney General, Office of the Attorney General, P.O. Box 11549, Columbia, S.C. 29211, on this 9 day of November, 2018.

Respectfully Submitted,
John Alexander

Sworn and Subscribed
this 9 day of November, 2018
[Signature]
Notary Public
My Commission Expires 9.30.26

CLERK OF COURT
SPARTANBURG COUNTY
2018 NOV 14 AM 10:41
M. HOPE BLACKLEY

Attachment 

#8

John L. Alexander, 19474c
Perry Correctional Inst.
430 Oaklawn Road, 29A115
Pelzer, SC 29685

May 29, 2019

Mr. Alan Wilson, Attorney General
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211

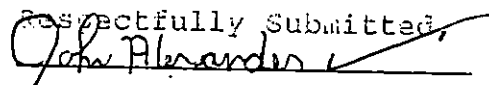
RE: 002018CP4203161

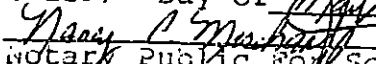
Dear Mr. Alan,

During July 10, 2018 I wrote your office requesting my Grand Jury Impanelment Documents, including the State's Petition, supporting materials, and the impaneling Judge's Order, which led to a True Bill on November 27, 2006.

As of the above date, I have not received any response from your office. As such, again I am requesting the above Grand Jury information this time pursuant to the Freedom Of Information Act (FOIA) 5 USCA Statute 552.

I thank you for your attention and time in this legal matter.

Respectfully Submitted,


Sworn and Subscribed
this 29th Day of May, 2019

Notary Public For South Carolina
My Commission Expires 1-23-2022.

Attachment #9

#9



ALAN WILSON
ATTORNEY GENERAL

June 6, 2019

John D. Alexander, 194748
Perry Correctional Institute
430 Oaklawn Rd., Q3A115
Pelzer, SC 29669

Re: Freedom of Information Act (FOIA) Request

Dear John D. Alexander:

Our Office is in receipt of your FOIA request for public records. Your FOIA request is denied pursuant to 2017 Act No. 67 (Eff. May 19, 2017) (FOIA right to inspect, copy, or receive an electronic transmission of any public record does not extend to individuals serving a sentence of imprisonment in a state or county correctional facility in this State, in another state, or in a federal correctional facility).

Sincerely yours,

Annalisa Queen
Program Assistant

10

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE.

IN THE COURT OF COMMON PLEAS
THIRTEENTH CIRCUIT

John Douglas Alexander, #194748,)

Plaintiff,)

vs.)

Alan M. Wilson, Attorney)
General, and The State Of)
South Carolina,)

Defendants,)

C/A No. 2019CP2304658

NOTION FOR DISCOVERY

To: Defendants

Pursuant to Rule 26 and 34, SCRPC and Rule 5, Rules of Criminal Procedure, the Plaintiff in the above captioned matter requests the disclosure of the following evidence to the Applicant by the Defendants:

- 1.) The Grand Jury Impanelment Documents, including;
- 2.) The State's Petition;
- 3.) Supporting Materials;
- 4.) The impaneling Judge's Order, which led to a true bill on November 27, 2006;
- 5.) The 911 Dispatch Emergency Taped Recording;
- 6.) CAD Reports; and
- 7.) Any and all other documents, taped recordings, ect. that the Attorney General Office have in connection with pre-trial, trial, conviction and sentence of the above Plaintiff.

Wherefore, it is prayed that this Honorable Court Grant the Motion For Discovery. And any other relief it deem just and proper.

Dated 8.28.19.

RESPECTFULLY SUBMITTED

John Alexander

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM SPARTANBURG COUNTY
COURT OF COMMON PLEAS

Honorable TMD

Case No. 2020-CP-42-01021

Appellate Case No. 2020-600679

RECEIVED

JUL 07 2020

SC Court of Appeals

John Douglas Alexander, #194748,-

Appellant,

VS.

Alan M. Wilson; and The State,

Respondent.

CERTIFICATE

I, John Alexander, Appellant above certify that the Designation Of Matter is filed in good faith and Just cause. And, contains no matter which is irrelevant to the appeal. Rule 209, SCACR

Dated ⁷~~6~~/2/20.

Respectfully Submitted

John D. Alexander

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM SPARTANBURG COUNTY
COURT OF COMMON PLEAS

Honorable TMD

Case No. 2020-CP-42-01021

Appellate Case No. 2020-000679

RECEIVED

JUL 07 2020

SC Court of Appeals

John Douglas Alexander, #194748,

Appellant,

vs.

Alan M. Wilson; and The State,

Respondent.

PROOF OF SERVICE

I, John Alexander, certify today this 2 day of ~~June~~ ^{July}, 2020 sent the Designation of Matter and Certificate United States Postal Services, prepaid, to Alan M. Wilson, Attorney General, Office of the Attorney General, Post Office Box 11549, Columbia, SC 29211. And to The South Carolina Court of Appeals, Clerk's Office, Post Office Box 11629, Columbia, SC 29211.

Respectfully Submitted,

John D. Alexander

Sworn and Subscribed

this 24 day of July, 2020

Nancy C. Coble

Notary Public

My Commission Expires 1-23-2023

John Alexander # 194748
Perry Correctional Institution
436 Oaklawn Road, J B121
Palzer, SC 29669

RECEIVED
JUL 07 2020
SC Court of Appeals

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

RECEIVED
JUL 02 2020
RC.I. MAILROOM

RC.I. MAIL