

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

Certiorari to Cherokee County  
Honorable Robin B. Stilwell, Circuit Court Judge

SEP 16 2020

SC Court of Appeals

Case No. 2017-001777

Alonzo Columbus Jeter, III,

PETITIONER,

v

State of South Carolina,

RESPONDENT.

MOTION FOR PRELIMINARY  
INJUNCTION

Petitioner, Alonzo C. Jeter, III, respectfully moves this Court for an Order which would issue a preliminary injunction as a preventive and protective measure so as to preserve the material which Petitioner requested by way of a Motion For Discovery which was filed in the PCR Court and Denied by the PCR Judge, Honorable Robin B. Stilwell.

PROCEDURAL HISTORY

A Motion For Discovery was filed on or about March 10, 2017, by and through Steven D. Epps, Esquire, whom represented Petitioner as PCR Counsel. The motion was heard on March 20, 2017, prior to the evidentiary hearing in the PCR Case. (See Appendix, pgs. 51-54).

By way of this Motion For Discovery, Petitioner sought that the South Carolina Law Enforcement Division (SLED) drug analysis in the underlying case be provided to the Record, and also that Petitioner's Medical, Mental Health and Disciplinary records which

were associated with the year of 2015, which were composed and created by and at the Cherokee County Detention Center, be provided for and entered into the record, the transcript of Petitioner's August 15, 2013, plea in the 2013-GS-11-00130 possession of marijuana case, and the Family Court transcript in the child-support case of Eugenia Wilson v Alonzo C. Deter, III, which was convened at the Spartanburg County Family Court. (See Also Supplemental Appendix pg. 1).

The Motion For Discovery was ultimately denied by the Honorable Judge Stilwell consequently due to Petitioner's ineffective PCR Counsel Epps' poor and lax representation. (See Appendix Pgs. 55, 111 and 112). See also Appendix pgs. 186-187 whereby this denial was used to Petitioner's detriment and prejudice.

### PRESERVATION

Petitioner has preserved, raised, and argued the issue of the denial of the motion for discovery. (See Petition For Writ of Certiorari pgs. 21 & 22; Petition For Writ of Certiorari Reply pgs. 14 & 15).

### STANDARD

A party seeking a preliminary injunction or temporary restraining order must establish all four of the following elements: (1) he is likely to succeed on the merits; (2) he is likely to suffer irreparable harm in the absence of preliminary relief; (3) the balance of equities tips in his favor; and (4) an injunction is in the public interest. Winter v Natural Resources Defense Council, Inc., 555

U.S. 7, 20 (2008); The Real Truth About Obama, Inc. v. Federal Election Comm'n, 575 F3d 342, 346-47 (4th Cir. 2009), overruling Blackwelder Furniture Co. of Statesville v Seilig Mfg. Co., 550 F2d 189 (4th Cir. 1977).  
A plaintiff must make a clear showing that he is likely to succeed on the merits of his claim. Winter, 555 U.S. at 22; Real Truth, 575 F3d at 345-46. Although inquiry into whether a party seeking a preliminary injunction has shown a likelihood of success on the merits requires plaintiffs seeking injunctions to make a clear showing that they are likely to succeed at trial, plaintiffs need not show a certainty of success. Similarly, he must make a clear showing that he is likely to be irreparably harmed absent injunctive relief. Winter, 555 U.S. at 19-20; Real Truth, 575 F3d at 347. Only then may the court consider whether the balance of equities tips in the party's favor. See Real Truth, 575 F3d at 346-47.

## MOTION

Petitioner seeks that this Court would issue an Order of Preliminary Injunction which would prevent these materials which Petitioner has requested by way of his motion for Discovery submitted en ee about March 10, 2017, and which he appeals the denial thereof. App. pgs. 51-54; Supplemental Appendix pg. 1.

Petitioner also seeks that the Brady and Rule 5 discovery material, videos, telephone recordings, and the still

Photograph image(s) which were presented to Petitioner immediately prior to entry of his guilty plea (App. pg. 70-71), which Petitioner asked that his ineffective PCR Counsel Eggs to acquire and have present for presentation and entering in the Record at Petitioner's PCR evidentiary hearing. (See Supplemental Appendix Pgs. 1-2).

Lastly, Petitioner brings to the attention of the Court, Petitioner's diligence has he has constantly and continually sought to acquire the SLED drug analysis of this underlying case and also his medical, mental health, and disciplinary records from the Cherokee County Detention Center (and Cherokee County Detention Center's contracted health provider, Southern Health Partners, LLC). Petitioner has been denied these records and documents by these said agencies constantly. (See also, Supplemental Appendix pg 1).

These agencies consistently deny Petitioner's requests as Cherokee County Detention Center and Southern Health Partners, LLC fail to respond to any of Petitioner's request (although after years of diligent requesting Southern Health Partners, LLC has released partial and incomplete records to the SCDC, which fail to contain and include any documents and records associated with the year of 2015.

SLED ultimately continues to deny Petitioner's requests

and does so basing its decision to deny Petitioner's request upon the language which exists within S.C. Code Ann. §30-4-30(A)(1), which states in part:

"[T]he right to inspect, copy, or receive an electronic transmission of any public record of a public body, . . . 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;"

SLED violates Petitioner's Ninth Amendment Constitutional rights as well as Petitioner's fundamental rights to due process as guaranteed by the Fifth and Fourteenth Amendments of the United States Constitution, as SLED denies Petitioner's request solely because Petitioner is a prisoner confined within the SCDC.

Most importantly, both agencies fail to consider and give effect to the latter portion of S.C. Code Ann. §30-4-30(A)(1), which states as South Carolina Legislature is carefully to include and forewarn the agencies in regard of this matter:

"However, this may not be construed to prevent those individuals from exercising their constitutionally protected rights, including, but not limited to, their right to call for evidence in their favor in a criminal prosecution under the South Carolina Rules of Criminal Procedure."

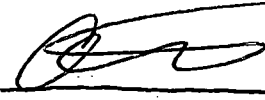
As Petitioner is prose and the sought and requested material is intended to be used in litigation, these agencies tread on the Constitutional rights of Petitioner.

## CONCLUSION

WHEREFORE, Petitioner prays this Court would issue an Order of Injunction which would prohibit these materials from being destroyed or altered and would also compel the said agencies to honor the requests of Petitioner in an expeditious and timely manner.

Without the Granting of this Motion, if Petitioner should prevail in the appeal of the denial of his Motion for Discovery, the equitable success of appeal on the issue would be meaningless without the preservation and availability of these materials.

As Petitioner is a prisoner and whom is also indigent and does proceed in this appeal as a pauper any such other further relief that would provide equity to this issue, such as a waiver of fees or payment of costs associated with acquiring these material would be equitable and in the interest of justice.

Respectfully submitted, 

Alonzo C. Jeter, III  
PETITIONER/prose

Tyger River Correctional Institution  
200 Prison Road  
Enoree, South Carolina

This 14 day of September, 2020.

ATTACHMENT

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
 ) SEVENTH JUDICIAL CIRCUIT  
 COUNTY OF CHEROKEE ) CASE NO.: 2016-CP-11-0293

Alonzo Columbus Jeter, III, #282902 )  
 Applicant / Petitioner, )  
 )  
 v. )  
 )  
 State of South Carolina, )  
 Respondent. )

**PETITIONER'S NOTICE AND MOTION  
 FOR DISCOVERY**

To: The Honorable Alan Wilson, Attorney General for the State of South Carolina and Assistant Attorney General Julie Coleman, Esquires:

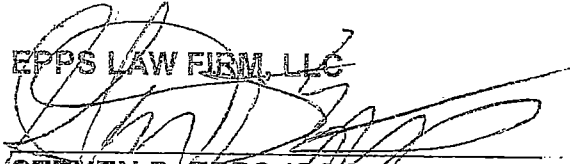
Please take note that the Petitioner, within 10 days or as soon as may be heard, will move before the Court seeking discovery in this matter pursuant to S.C. Code Ann. §17-27-150 (A). Specifically, Petitioner would like to pursue discovery in the following ~~areas for the following reasons:~~

1. SLED drug analysis records related to the drugs he is alleged to have sold during the dates of January 12, 14, and 15, 2015 (the underlying charges to this PCR) to dispute an actual sale took place during January 12, 2015 and that the charge for trafficking would not stand;
2. His medical records and disciplinary records with the Cherokee County Sheriff's Detention Center during the dates of January – July 2015 to corroborate his mental condition at the time of the underlying guilty plea leading to this PCR;
3. His Cherokee County Department of Mental Health records to corroborate his mental condition at the time of the underlying guilty plea leading to this PCR; and
4. Family Court transcripts and materials in the case of Jeter v. Jeter for mitigation material as to his employment.

FILED IN THE OFFICE  
 CLERK OF COURT  
 2017 MAR 10 P 3:33  
 RANDI W. ROSE  
 CHEROKEE COUNTY, SC

Therefore, Petitioner requests an Order granting discovery on the above items and an Order directing for payment of any fees or costs relative to the securing of this discovery.

EPPS LAW FIRM, LLC

  
STEVEN D. EPPS (SC Bar # 72722)  
104-A Franklin Avenue, # 281  
Spartanburg, SC 29301

(864) 590-4848 Telephone  
steven@eppslawfirm.com  
ATTORNEY FOR PETITIONER

Spartanburg, South Carolina  
March 10, 2017

FILED IN THE OFFICE  
CLERK OF COURT  
2017 MAR 10 P 3:33  
BRANDY W. HOBBS  
CHEROKEE COUNTY, SC



South Carolina  
Law Enforcement Division

P.O. Box 21398  
Columbia, South Carolina  
29221-1398

Henry D. McMaster, Governor  
Mark A. Keel, Chief

Tel: (803) 737-9000

September 9, 2017

Alonzo C. Jeter, III, #282902  
Perry C. I. / Q1-B-215  
430 Oaklawn Road  
Pelzer, SC 29660

RE: Freedom of Information Act Request #2017-0592

Dear Mr. Jeter:

This letter is to inform you that the South Carolina Law Enforcement Division ("SLED") received your FOIA request on August 28, 2017.

Please advised that pursuant to S.C. Code Ann. § 30-4-30(A)(1), the right to inspect, copy, or receive an electronic transmission of any public record of a public body 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,

*Thomas W. Berry*

Agent Thomas W. Berry  
Freedom of Information Coordinator

TWB/mcp

**RECEIVED**

SEP 15 2017

P.C.I. MAILROOM

May 25, 2020

Alonzo C. Jeter, III  
Tyger River Correctional Institution  
W-7-101/#282902  
200 Prison Road  
Enoree, South Carolina 29335

S.C. Law Enforcement Division  
P O Box 21398  
Columbia, South Carolina 29221-1398

MAY 26 2020  
TYRCI MAILROOM

RE: Drug Analysis, etc.; Case Nos. 1500183, 1500226, 1500232  
B245273, B246531, B246529

Dear Sir or Madam:

I write to you today requesting the following information as both a pro se litigant in a case which involves the information sought which such evidence also involves me personally and is intended to be used and serve as such evidence in my favor in regards of a criminal prosecution. In conjunction, or in the alternative, I submit this request for this information under the Freedom of Information Act, pursuant to SC Code of Laws 30-4-10, 30-4-50, 30-4-110 and Title 5 United States Code sections 552, 552(a).

Please provide me the following:

1. Any and all documents to include but not limited to SLED Drug Analysis results and Chain of Custody for Control Number B245273, Contributing Agency ORI SCO 110000, Cherokee County, Case No. 1500183

2. Any and all documents to include but not limited to SLED Drug Analysis results and chain of custody for Control Number B246531, Contributing Agency ORI SCO 110000, Cherokee County, Case No. 1500226

3. Any and all documents to include but not limited to SLED Drug Analysis results and Chain of Custody for Control Number B246529, Contributing Agency ORI SCO 110000, Cherokee County, Case No. 1500232

In so far as this request for information would rather have to be construed and submitted as a FOIA request, rather than simply as a request of the prose litigant in which this information sought involves; I am also aware of the normal practice of this agency that it would deny an inmate's FOIA request on the basis of S.C. Code Ann. § 30-4-30(A)(1). However, such denial on such basis would be improper in these circumstances as I, as the requester, although am an individual serving a sentence in a state correctional facility; I am also requesting in capacity of a prose litigant whom is seeking this information to be entered as evidence in a pending case. Such a denial under these circumstances would in fact violate fundamental rights to due process as guaranteed by the Fifth and Fourteenth Amendments to the United States Constitution.

Thank you for your assistance and understanding in this matter.

Sincerely, 

Alanzo C. Jeter, III

# PROOF OF SERVICE

I, Alonzo C. Jeter, III, hereby certify that I have mailed the within Request for Information letter to the S.C. Law Enforcement Division, by placing a copy of the same inside of a postage prepaid envelope, placing said envelope in the hands of Tiger River Correctional Institution's mail room personnel on this 26<sup>th</sup> day of MAY, 2020, for mailing via the United States Mail, addressed as follows: S.C. Law Enforcement Division, P.O. Box 21398, Columbia, South Carolina 29221-1398.

Sworn and Subscribed before me  
this 26<sup>th</sup> day of MAY, 2020

Paul Dennis Cuel  
Notary Public for South Carolina  
My Commission Expires: Dec 12, 2022

Alonzo C. Jeter, III  
Tiger River Correctional Institution  
200 Prison Road  
Enoree, South Carolina 29335



South Carolina  
Law Enforcement Division

P.O. Box 21398  
Columbia, South Carolina  
29221-1398

*Henry D. McMaster, Governor*

*Mark A. Keel, Chief*

*Tel: (803) 737-9000*

June 10, 2020

Alonzo C. Jeter, #282902  
Tyger River Correctional Institution  
200 Prison Road  
Enoree, SC 29335

RE: Freedom of Information Act Request #2020-0314

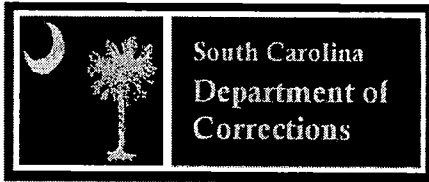
Dear Mr. Jeter,

This letter is to inform you that the South Carolina Law Enforcement Division ("SLED") received your letter on June 2, 2020.

Please advised that pursuant to S.C. Code Ann. § 30-4-30(A)(1), the right to inspect, copy, or receive an electronic transmission of any public record of a public body 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,

Tommy Crosby  
Freedom of Information Coordinator



SCDC ID: 282902

PATIENT: ALONZO COLUMBUS JETER III  
DATE OF BIRTH: 10/12/1977  
DOC #: 21887  
DATE: 08/15/2019 2:00 PM  
VISIT TYPE: Psychiatric Clinic  
Visit Location: Confidential Setting  
**Psychopharm**

**Individuals Present**

Contact type: Telemedicine

Individual present

**Prescriber's Evaluation**

41 yo male at Tyger River who was last seen in psychiatry clinic by me on 6/6/2019. Dx at this visit was SAFD, bipolar type by history. Plan was to change Geodon to 40 mg po qhs with snack due to day time grogginess,, requested again old records be forwarded to me for review and follow up 6-8 weeks.

Ms. Wyant, QHMP supervisor at Tyger River was present during today's session.

Since he was last seen, I have still not received copies of his prior records despite my requesting to review them in order to clarify his prior treatment history. He presents today initially very withdrawn and frustrated and admits that he has a lack of trust that SCDC has actually sent his signed release forms. He reports that he did initially try the Geodon but then doubted that I had actually requested the records so stopped taking it. Review of the EZ MAR indicates that he did take it a few times in June and once in July. A good deal of the session was spent engaging him in the meeting to build an improved therapeutic alliance. He admits that he is worried that the Patrick B. Harris records would lead me to think he "only had a substance issue". Reassured him that review of the records was just part of the evaluation process that would help clarify a diagnosis and would help guide treatment recommendations. He agrees to restart Geodon, sign releases again, and follow up in one week for recheck of response to medication to ensure if a side effect was occurring that he could discuss it with me. He denies SI, HI today.

Past Psych- He reports prior psychiatric hospitalizations at Patrick B Harris in 2014 in the upstate and tx at Cherokee MHC. He also reports psychiatric tx in the Cherokee County detention center prior to entering SCDC in 2015. He

has received conflicting opinions on his diagnoses with some clinicians attributing symptoms to history of drug use and others stating SAFD bipolar type in addition to his substance use issues.

PMH- none reported

Allergies- denies known drug allergies

MSE- alert, well groomed, dark circles under eyes, intermittent eye contact that improves as session continues, initially guarded but becomes more engaged as session progresses, no AIMS, oriented to person, place, time and situation. Speech- frustrated tone, increased rate. Thought content continues to have themes related to his stressors. Mood irritable, affect constricted. Denies SI, HI, AH and VH.

### Risk Assessment

Current Encounter

#### Risk Assessments

Patient denies suicidal ideation, plan, intent, and/or attempt.

Patient denies property damage ideation, plan, intent, and/or attempt.

Patient denies homicidal ideation, plan, intent, and/or attempt.

Risk Assessment History

Risk	Current	Past	Documented	Event Date	Approximate Date	Ideation	Plan	Intent	Scale
Suicide	Denies		08/15/2019	08/15/2019	No				
Property	Denies		08/15/2019	08/15/2019	No				
Homicide	Denies		08/15/2019	08/15/2019	No				

Attempt	Planned/ Impulsive	Drug/Alcohol Influenced	Medically Treated	Plan Attempt	Description
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### Medication Information

#### ASSESSMENT/DIAGNOSIS

Behavioral Health Diagnoses

#	Description	Severity	Impression/Differential Dx	Specifiers
1	Schizoaffective disorder, bipolar type (F25.0)		Impression - historical- old records requested.	

#### Allergy

Ingredient	Reaction	Medication Name	Comment
NO KNOWN			
ALLERGIES			

**Active Medication**

Medication	Sig Desc	PRN Status	PRN Reason	Start Date	Stop Date
ziprasidone 40 mg capsule	take 1 capsule by oral route every evening with food	N		06/06/2019	08/15/2019
ziprasidone 40 mg capsule	take 1 capsule by oral route every evening with food	N		08/15/2019	12/12/2019

Diagnosis since last visit:

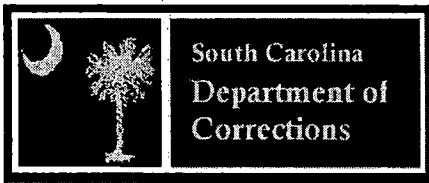
**Plan**

1. Encouraged compliance with Geodon trial x 1 week. Renewed Geodon 40 mg po qhs with food.
2. Ms. Wyant, QHMP supervisor, will meet with him immediately following this session to sign releases for discharge summary at Patrick Harris in 2014, MH records at Cherokee MHC and MH records at Cherokee detention center( he reports being on suicide watch there). I reiterated to him that review of his old treatment records was important to me in order to assist with treatment planning. He thanked me for this information.
3. Follow up in one week for med check and to build improved therapeutic alliance.

**SIGNATURES**

Psychiatrist: Signed by Megan Howard, on 08/15/2019  
*Document generated by: Megan Howard 08/15/2019 03:07 PM*

South Carolina Department of Corrections  
 4444 Broad River Road | Columbia, SC 29210



SCDC ID: 282902 00000282902

PATIENT: ALONZO COLUMBUS JETER III  
DATE OF BIRTH: 10/12/1977  
DOC #: 21887  
DATE: 05/30/2019 8:04 PM  
VISIT TYPE: QMHP Session  
Location of Visit: Confidential Setting

**Individual Counsel/Psych Prog Note**

**General**

Program Name: Outpatient

Start time: 11:00 AM

End time: 00 hours, 10 minutes

Duration: 00 hours, 10 minutes

**Individuals Present/Support Resources**

Individual present.

**Plan and Additional Information**

Plan/Additional Information:

Inmate was seen in Programs while waiting for his turn in psych clinic. He reported he needed to see me. When asked about what was wrong, he asked me about the previous requests I sent off regarding his mental health records from different places. He needs them for his legal case, and has been frustrated for quite a long time (ever since he was on my caseload at Perry CI) that he hasn't received everything he wants for his case. He also wants his disciplinary records from the Cherokee County Jail in addition to the mental health records in an effort to get some relief for his current sentence. He wants me to resubmit the records requests (and if I do it will be the fourth time at least), but also provide him with written proof (date/time stamped) of when the requests were made. He also needs to see me this afternoon after choir rehearsal for an "urgent" issue. When asked, he said he needs about 65 copies for his legal case file, and he can't afford to get them done. He reported he will be returning to the Chapel if not seen in clinic by the time count clears, and that he would need to be rescheduled. Inmate was advised to have the Chaplain call me this afternoon and he agreed.



**Southern Health  
Partners**  
Your Partner In Affordable Inmate Healthcare

### **INSTRUCTIONS FOR AUTHORIZATION FOR RELEASE OF MEDICAL RECORDS**

Medical Records will not be released unless a signed "Authorization for Release of Medical Records" is received. Southern Health Partners will accept any HIPAA-compliant release duly signed by the Patient within 30 days prior to the date of the medical records request.

Southern Health Partners charges for copying medical records as authorized by state law regulations. This fee is not charged where prohibited. Southern Health Partners requires payment in advance for medical records copies. Upon receiving a request for medical records and accompanying authorization, SHP will determine the number of pages to be copied to respond to the request and will forward that information to the requestor. Once payment is received, SHP will have the records copied and mailed. All records are sent U.S. Mail; SHP does not fax medical records.

Payment must be in the form of a certified check or money order made payable to Southern Health Partners, Inc. and may be mailed to:

Southern Health Partners  
Attn: Risk Management  
2030 Hamilton Place Blvd, Ste. 140  
Chattanooga, TN 37421

Any questions may be directed to Hanna Bishop, Operations/Risk Management Specialist, at (423) 553-5635 or [hanna.bishop@southernhealthpartners.com](mailto:hanna.bishop@southernhealthpartners.com).

**NOTE: These provisions do not apply to Social Security/Disability Determination requests.**



April 8, 2019

Alonzo Jetter, III  
Tyger River Correctional Institute  
U-7-101/#282902  
200 Prison Road  
Enoree, SC 29335

Re: Medical Records Request

Dear Mr. Jeter,

I am in receipt of your medical records request dated April 1, 2019. Unfortunately, we are unable to process our request at this time. Due to HIPAA, we are unable to produce medical records to those who are currently incarcerated. If you would like to send your records to a third party that is not currently in the facility, we would be happy to do that. Please complete the attached HIPAA release form and send back to me. Once I have received your signed form back and have a page count of your records, I will send an invoice for payment to the person you are requesting your records be sent to. Once the payment is received back, your records will be mailed out.

Please let me know if you have any further questions.

Sincerely,

Hanna Bishop  
Operations/Risk Management

Enclosure

Page 13

17



South Carolina  
Department of Labor, Licensing and Regulation



110 Centerview Drive  
Post Office Box 11329  
Columbia, SC 29211-1329  
Phone: (803) 896-4470  
FAX: (803) 896-4656

Division of Professional and Occupational Licensing  
Office of Investigations and Enforcement

Henry D. McMaster  
Governor

Emily H. Farr  
Director

December 23, 2019

**CONFIDENTIAL**

Alonzo C. Jeter III #282902  
TRCI U-7-101  
200 Prison Rd.  
Enoree, SC 29335

RE: Inquiry

Dear Mr. Jeter:

You state concerns regarding a physician's refusal to release full medical records. Pursuant to S.C. Code Ann. § 44-115-40, "a physician shall not honor a request for the release of copies of medical records without the receipt of express written consent of the patient. Because the Health Insurance Portability and Accountability Act (HIPAA) mandates 30 days for physicians to comply with a valid request for medical records, the Board of Medical Examiners expects physicians to comply with requests for medical records no later than 30 days after the request has been received.

Please find attached, as requested, a Medical Professions Complaint Form. If you wish to file a complaint, you may return the completed complaint form to the address included on the top of the form.

Sincerely,

*Complaint Analyst*

*April 29* 2020

Alonzo C. Jeter, III, #282902  
Tyger River Correctional Institution  
200 Prison Road  
Enoree, South Carolina 29335

**South Carolina Department of Labor, Licensing and Regulation**  
Division of Professional and Occupational Licensing  
Office of Investigations and Enforcement  
110 Centerview Dr.  
Post Office Box 11329  
Columbia, South Carolina 29211-1329

**RE: Alonzo C. Jeter, III, v Southern Health Partners, LLC**

Dear Sir or Madam:

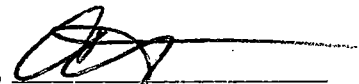
Enclosed, please find the following documents for filing in your office wherein I seek to commence a complaint against Southern Health Partners, LLC:

- 1) Claim/Complaint
- 2) Complaint's Evidence
- 3) Affidavit of Authenticity
- 4) Certificate of Service

Enclosed, please also find an additional copy of these documents along with a self-addressed stamped envelope. Please return to me file-stamped copies of these documents by way of the provided SASE.

Thank you for your assistance in this matter.

Sincerely,



Alonzo C. Jeter, III  
COMPLAINANT

**Cc: FILE**

SOUTH CAROLINA DEPARTMENT OF LABOR, LICENSING AND REGULATION  
Division of Professional and Occupational Licensing  
Office of Investigations and Enforcement

Case No.

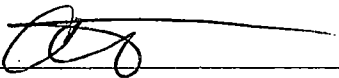
Alonzo Columbus Jeter, III, ..... COMPLAINANT,

Vs.

Southern Health Partners, ..... RESPONDENT.

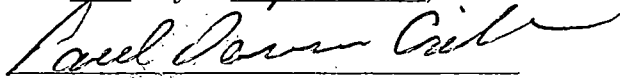
**CERTIFICATE OF SERVICE**

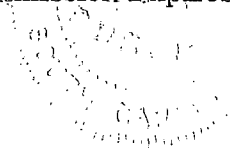
I, Alonzo C. Jeter, III, hereby certify that I have served the COMPLAINT, COMPLAINANT'S EVIDENCE, and AFFIDAVIT OF AUTHENTICITY, upon the South Carolina Department of Labor, Licensing and Regulation - Division of Professional and Occupational Licensing - Office of Investigations and Enforcement, on this 29 day of April, 2020, by depositing a copy of the same within a postage prepaid envelope and placing said envelope in the hands of the Tyger River Correctional Institution mailroom personnel for mailing via the United States mail, addressed as follows: South Carolina Department of Labor, Licensing and Regulation - Division of Professional and Occupational Licensing - Office of Investigations and Enforcement, 110 Centerview Dr., Post Office Box 11329, Columbia, South Carolina 29211-1329.

s/   
Alonzo C. Jeter, III, 282902  
COMPLAINANT

Tyger River Correctional Institution  
200 Prison Road  
Enoree, South Carolina 29335

SWORN and Subscribed to me  
this 30<sup>th</sup> day of April, 2020

  
Notary Public for South Carolina  
My Commission Expires: Dec. 10, 2024





Office of Investigations and Enforcement

110 Centerview Dr. • Columbia • SC • 29210
P.O. Box 11329 • Columbia • SC 29211-1329
Phone: 803-896-4470 • Fax: 803-896-4656



MEDICAL PROFESSIONS COMPLAINT FORM

- Chiropractic, Occupational Therapy, Podiatry, Counselors, Opticianry, Psychology, Dietetics, Optometry, Social Work, Long Term Health Care, Pharmacy, Speech Language Pathology & Audiology, Medical, Physical Therapy, Veterinary, Nursing

COMPLAINANT INFORMATION (Individual filing complaint)

Name: Alonzo Columbus Jeter, III
Tiger River Correctional Institution
Address: 200 Prison Road, Enoree, SC 29335

Contact Phone: N/A, Email: N/A, Alt. Phone: N/A, Fax: N/A

What is the best way to reach you? (Phone, email, etc.) Mailing Address above

RESPONDENT INFORMATION (Individual the complaint is filed against)

Name: Margaret Lewis; Hanna Bishop, License: 864-487-6246
Business Name: Southern Health Partners, Phone: 423-553-5635
Address: 2030 Hamilton Place Blvd; Chattanooga, TN 37421

WITNESSES

Provide name(s), address(es) and contact number(s). Attach additional sheet if more space is needed.
Kathy Wyatt (Mental Health Admin) Tiger River Correctional Inst, Ext. 1168, 864-243-4700
Ms. S. Boozer (QMHP) 200 Prison Road, Enoree SC 29335, 864-420-4622

Name, Address, Phone

INCIDENT DETAILS

Alleged Violation: Inordinate delay and refusal to release entire full medical record.

Date(s) of Occurrence: 11/16/2015; 4/27/2016; 5/2/2016; 5/19/2016; 7/22/2016. 1/28/2019 2/19/19; 4/1/2019; 8/16/19; 9/15/19; 10/21/19; 12/16/19; 1/3/20; 1/13/20; 1/16/20; 1/22/20

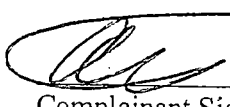
Please provide a statement of facts, allegations and/or, concerns. Attach a copy of each document you possess that can substantiate any facts in your complaint. These documents will not be returned. Please attach additional sheets, if necessary. I have continually sought to be provided my entire full and complete medical records from Cherokee County Detention Center/Southern Health Partners. I received no response from 11/16/2015 until 8/16/2019. Upon finally reaching out via email to Hanna Bishop of Southern Health Partners and receiving a response email from SHP, medical records from Cherokee County Detention Center was not received until December 14, 2019. However, there was records missing and therefore was only a partial incomplete medical file received. A total of 74 pages were received.

Have you attempted to contact the respondent concerning your complaint? YES  NO

If yes, when? January 3, 2020; January 6, 2020; December 20, 2019; January 13, 2020

What was the result? No records received. Conflict in communication between all mental health counselors at the institutions due to everyone attempting to protect the Respondent and affiliates. Conflict and refusal of mental health counselor on January 13, 2020 - counselor would not confirm in writing the years the medical records which were received was associated with, could not identify no psychotropic medications prescribed and administered in history of Cherokee County Detention Center

I attest that the information provided is true, correct and complete to the best of my knowledge.

  
Complainant Signature

April 29, 2020  
Date

I have no objection of my name being released during the investigation.

I do object to my name being released during the investigation.

\* The department cannot guarantee that the name of the complainant can remain confidential throughout the investigation. Medical

SOUTH CAROLINA DEPARTMENT OF LABOR, LICENSING AND REGULATION  
Division of Professional and Occupational Licensing  
Office of Investigations and Enforcement

Case No.

Alonzo Columbus Jeter, III, ..... COMPLAINANT,

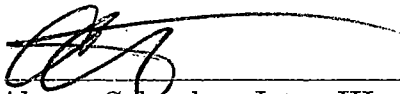
Vs.

Southern Health Partners, ..... RESPONDENT.

**AFFIDAVIT OF AUTHENTICITY**

I, Alonzo C. Jeter, Complainant, hereby certify that the documents hereby submitted as exhibits in this action are in-fact true and correct copies of genuine authentic documents.

I further certify under the penalty of perjury, the above statement is true and correct.

s/   
Alonzo Columbus Jeter, III  
COMPLAINANT

Tyger River Correctional Institution  
200 Prison Road  
Enoree, South Carolina 29335

This 29 day of April, 2020

SOUTH CAROLINA DEPARTMENT OF LABOR, LICENSING AND REGULATION  
Division of Professional and Occupational Licensing  
Office of Investigations and Enforcement

---

Case No.

---

Alonzo Columbus Jeter, III,..... COMPLAINANT,

Vs.

Southern Health Partners, ..... RESPONDENT.

---

**COMPLAINANT'S EVIDENCE**

---

Alonzo Columbus Jeter, III  
**COMPLAINANT**

Tyger River Correctional Institution  
200 Prison Road  
Enoree, South Carolina 29335

# COMPLAINANT'S EVIDENCE

## INDEX

	PAGE
SCDC FORM 19-11, Request to Enloe/K. Burgess, RN, dated 11/16/2015.....	1
SCDC FORM 19-11, Request to Enloe/K. Burgess, RN, dated 4/27/2016.....	2
SCDC FORM 19-11, Request to Enloe/K. Burgess, RN, dated 5/2/2016.....	3
Letter to Cherokee County Detention Center (CCDC), dated 5/19/2016.....	4
Proof of Service associated with Letter to (CCDC), dated 5/19/2016.....	5
SCDC FORM 19-11, Request to Enloe/K. Burgess, RN, dated 7/22/2016.....	6
SCDC FORM 19-11, Request to Enloe/K. Burgess, RN, dated 1/28/2019.....	7
SCDC FORM 19-11, Request to Dr. B. Wood, ( <i>Kirkland Corr. Inst.</i> ) dated 1/29/2019.....	8
Fax Transmission Report, dated 2/19/2019.....	9
Correspondence of Megan Harris of SCDC to (CCDC).....	10
Authorization for Release of Records, dated 2/14/2019.....	11
Complainant's Correspondence to (CCDC), dated 4/1/2019.....	12
Proof of Service associated with Correspondence to (CCDC), 4/1/2019.....	13
Correspondence to Southern Health Partners, LLC, (SHP), dated 4/1/2019.....	14
Proof of Service associated with (SHP) correspondence, dated 4/1/2019.....	15
Authorization for Release of Records, dated 8/16/2019.....	16
Email correspondence of Hanna Bishop & Kathy Wyant, dated 8/16/2019-10/21/2019.....	17-20
SCDC FORM 19-11, Request to Ms. S. Boozer, dated 12/20/2019.....	21
Proof of Service associated with Request to Ms. S. Boozer, 12/20/2019.....	22

[CONTINUED ON FOLLOWING PAGE]  
Page 21

SCDC FORM 19-11, Request to Kathy Wyant, dated 12/20/2019..... 23

Proof of Service associated with Request to Kathy Wyant, dated 12/20/2019..... 24

Correspondence to Southern Health Partners, LLC, (SHP), dated 1/2/2020..... 25-26

Proof of Service associated with Correspondence to SHP, dated 1/3/2020..... 27

SCDC FORM 19-11, Request to Kathy Wyant, dated 1/3/2020..... 28

Proof of Service associated with Request to Kathy Wyant, dated 1/3/2020..... 29

SCDC FORM 19-11, Request to S. Boozer, dated 1/3/2020..... 30

Proof of Service associated with Request to S. Boozer, dated 1/3/2020..... 31

Response of Request to S. Boozer w/ attachment Confirmation email and Affidavit..... 32-33

SCDC FORM 19-11, Request to Health Information Resources, dated 1/6/2020 ----- 34

Proof of Service associated with Request to Health Information Resources ..... 35

Response of Request to Health Information Resources ..... 36-37

SCDC FORM 19-11, Request to Kathy Wyant, dated 1/22/2020..... 38

Proof of Service associated with Request to Kathy Wyant, dated 1/23/2020..... 39

SCDC FORM 19-11, Request to S. Boozer, dated 1/22/2020..... 40

Proof of Service associated with Request to S. Boozer, dated 1/23/2020..... 41

Response of Request to S. Boozer ..... 42

Correspondence to Southern Health Partners, LLC, (SHP), dated 2/6/2020..... 43-44

Proof of Service associated with Correspondence to SHP, dated 2/7/2020..... 45

Authorization for Release of Records, dated 2/6/2020..... 46



South Carolina  
Department of Labor, Licensing and Regulation



Division of Professional and Occupational Licensing  
Office of Investigations and Enforcement

110 Centerview Drive  
Post Office Box 11329  
Columbia, SC 29211-1329  
Phone: (803) 896-4470  
FAX: (803) 896-4656

Henry D. McMaster  
Governor

July 15, 2020

**CONFIDENTIAL**

Alonzo C. Jeter III #282902  
TRCI U7-101-B  
200 Prison Road  
Enoree, SC 29335

RE: Complaint against Margaret Lewis and Hanna Bishop

Dear Mr. Jeter:

This correspondence is to advise you that the Office of Investigations and Enforcement has received and reviewed your complaint. Pursuant to Title 40 of the South Carolina Code of Laws, this agency has the authority to investigate and discipline professional licensees for violations of the Practice Act under which they are governed.

After a search of the agency's licensure database, it does not appear that the individuals named in your complaint are licensed to practice medicine in the state of South Carolina. Therefore, your complaint against them does not fall within the jurisdiction of this agency.

As such, this file is being closed with no further action by the Board anticipated.

Thank you for your interest in the healthy and safe practice of professions and occupations in South Carolina. I regret that we are unable to assist you further in this matter.

A copy of your complaint is enclosed, as requested.

Sincerely,

*Complaint Analyst*

Encl.

April 20, 2020

Alonzo C. Jeter, III  
Tyger River Correctional Institution  
U-7-101/#282902  
200 Prison Road  
Enoree, South Carolina 29335

SCDLLR  
110 Centerview Drive  
Post Office Box 11329  
Columbia, SC 29211-1329

Dear Sir or Madam:

I am writing seeking that you will please provide me the following information:

1. Status of: Dr. Lucinda - He served Southern Health Partners / Cherokee County Detention Center in 2015.  
Psychiatrist / Psychologist
2. Status of Dr. Megan Howard - She served South Carolina Department of Corrections in 2019-2020, I think.  
Psychiatrist / Psychologist
3. Nurse Margaret Lewis - She served Southern Health Partners Cherokee County Detention Center in 2012-2016.

Please also provide me the current contact information and places of employment, current standing, and other such information that is available at SCOLLR or SCOLLR website.

Thank you for your assistance in this matter.

Sincerely, 

Alonzo C. Jeter, III

RECEIVED

JUL 16 2020

LLR Director's Office

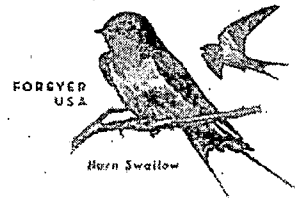
page 25

Alonzo C. Jeter, III  
Tyger River Correctional Institution  
U-7-101/#282902  
200 Prison Road  
Enoree, South Carolina 29335

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JUL 16 2020

LLR Director's Office



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APR 21 2020

TYRCI MAILROOM

LEGAL MAIL

SCDLLR  
110 Centerview Drive  
Post Office Box 11329  
Columbia, SC 29211-1329

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South Carolina  
Department of Labor, Licensing and Regulation



110 Centerview Drive  
Post Office Box 11329  
Columbia, SC 29211-1329  
(803) 896-4300  
FAX (803) 896-4393

Henry D. McMaster  
Governor

Emily H. Farr  
Director

July 21, 2020

Alonzo C. Jeter, III  
Tiger River Correctional Institution  
U-7-10/#282902  
200 Prison Road  
Enoree, SC 29335

Re: Freedom of Information Act (FOIA) Request

Dear Mr. Jeter:

This letter is in response to your FOIA request received in our office on July 16, 2020. A copy of your request is included with this letter.

Please be advised that S.C. Code Section 30-4-30(A)(1) states: "A person has a right to inspect, copy, or receive an electronic transmission of any public record of a public body, except as otherwise provided by Section 30-4-40, or other state and federal laws, in accordance with reasonable rules concerning time and place of access. This right 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; however, this may not be construed to prevent those individuals from exercising their constitutionally protected rights, including, but not limited to, their right to call for evidence in their favor in a criminal prosecution under the South Carolina Rules of Criminal Procedure."

Sincerely,

Kathy Burgess  
FOIA and Communications Coordinator  
Office of Communications and Governmental Affairs  
S.C. Department of Labor, Licensing and Regulation  
110 Centerview Drive, Columbia, S.C. 29210

August 5, 2020

Alonzo C. Jeter, III, #282902  
Tiger River Correctional Institution  
200 Prison Road  
Enoree, SC 29335

Office of Public Information  
SCDLLR  
110 Centerview Drive  
P O Box 11329  
Columbia, SC 29211-1329

RE: Denial of Freedom of Information Act (FOIA) Request

Dear Sir or Madam:


This letter is in response to your letter dated July 21, 2020, whereby your agency denied my Request under the Freedom of Information Act (FOIA).

Please be informed that I am requesting this information in prose capacity as this information is needed and required as will be submitted as evidence in my favor regarding my criminal prosecution and case. See also Alonzo C. Jeter, III, v State of South Carolina, Appellate Case No. 2017-001777, (S.C. Ct. App), (currently litigating prose); see also Alonzo C. Jeter, III v Southern Health Partners, (action attempted to advance in the SCDLLR, acting prose).

Please be advised of S.C. Code Section 30-4-30(A)(1), as it states in relevant portion: "[T]his may not be construed to prevent these [imprisoned] individuals from exercising their constitutionally protected rights, including, but not limited to, their right to call for evidence in their favor in a criminal prosecution under the South Carolina Rules of Criminal Procedure."

Simply put, this agency's denial of information as the sought information is in the interest of equity and Justice is an unreasonable and unconstitutional denial as such treads on the Fifth, Sixth, Ninth, and Fourteenth Amendments.

Please reconsider your denial, while informed of this provided information and therefore and thereby please grant the FOIA Request. If you would still deny me FOIA, please inform me the manner for appealing decision. Thank you for your assistance in this matter.

Sincerely, 

Alenzo C. Jeter, III

**RECEIVED**

**AUG 10 2020**

LLR Director's Office

CERTIFICATE OF SERVICE

I, Alonzo C. Jeter, III, hereby certify that I have served the Response to Denial of Freedom of Information Act Request on the Respondent by placing a copy of the same inside of a postage prepaid envelope and placing said envelope in the hands of Tyger River Correctional Institution's mailroom personnel on this 6th day of August, 2020, for mailing via the United States Mail, addressed as follows: Office of Public Information, SCOLLR, 110 Centerview Drive, PO Box 11329, Columbia SC 29211-1329.



Alonzo C. Jeter, III

SWORN and Subscribed before me  
this 6 day of August, 202

David E. Berry  
Notary Public for South Carolina

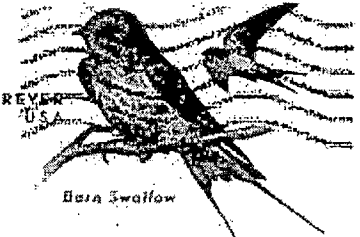
My Commission Expires: 1/31/30

Alonzo C. Jeter, III  
Tyger River Correctional Institution  
U-7-101/#282902  
200 Prison Road  
Enoree, SC 29335

GREENVILLE SC 296

OF ALM 2000 PM 3.1

FOREVER  
20



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AUG 10 2020

LLR Director's Office

Office of Public Information  
SCOLLR  
110 Centerview Drive  
PO Box 11329  
Columbia, SC 29211-1329

**LEGAL MAIL**

29211-132929





South Carolina  
Department of Labor, Licensing and Regulation



110 Centerview Drive  
Post Office Box 11329  
Columbia, SC 29211-1329  
(803) 896-4300  
FAX (803) 896-4393

Henry D. McMaster  
Governor

Emily H. Farr  
Director

August 13, 2020

Alonzo C. Jeter, III  
Tiger River Correctional Institution  
U-7-10/#282902  
200 Prison Road  
Enoree, SC 29335

Re: Freedom of Information Act (FOIA) Request

Dear Mr. Jeter:

This letter is in response to your letter received in our office on August 10, 2020 regarding our response to your FOIA request. A copy of your request is included with this letter.

Our response to your FOIA request stands. Therefore, there are no responsive documents to your request.

S.C. Code Section 30-4-30(A)(1) states: "A person has a right to inspect, copy, or receive an electronic transmission of any public record of a public body, except as otherwise provided by Section 30-4-40, or other state and federal laws, in accordance with reasonable rules concerning time and place of access. This right 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; however, this may not be construed to prevent those individuals from exercising their constitutionally protected rights, including, but not limited to, their right to call for evidence in their favor in a criminal prosecution under the South Carolina Rules of Criminal Procedure."

Sincerely,

Kathy Burgess  
FOIA and Communications Coordinator  
Office of Communications and Governmental Affairs  
S.C. Department of Labor, Licensing and Regulation  
110 Centerview Drive, Columbia, S.C. 29210

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Certiorari to Cherokee County  
Honorable Robin B. Stilwell, Circuit Court Judge

Case No. 2017-001777

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SEP 16 2020

SC Court of Appeals

Alonzo Columbus Jeter, III,

PETITIONER,

State of South Carolina,

RESPONDENT.

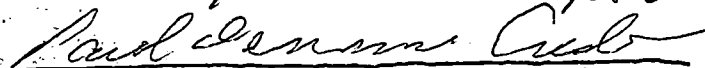
CERTIFICATE OF SERVICE

I, Alonzo C. Jeter, III, hereby certify that I have served the Motion For Preliminary Injunction, on Respondent by placing a copy of the same inside of a postage prepaid envelope and by placing the same envelope in the hands of Tiger River Correctional Institution's mail room personnel on this 14<sup>th</sup> day of September, 2020, for mailing via the United States Mail, addressed as follows: Vann Henry Gunter Jr., Esquire, Assistant Attorney General, Office of the Attorney General, Post Office Box 11549, Columbia South Carolina 29211.

Sworn and subscribed before me  
this 14<sup>th</sup> day of Sept, 2020



Alonzo C. Jeter, III  
PETITIONER/prose



Notary Public for South Carolina  
My Commission Expires: Dec 10, 2021

Tiger River Correctional Institution  
200 Prison Road  
Enoree, South Carolina 29335

September 14, 2020

Alonzo C. Jeter, III, #282902  
Tyger River Correctional Institution  
200 Prison Road  
Enoree, SC 29335

The Honorable Jerry A. Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED**

SEP 16 2020

SC Court of Appeals

RE: Alonzo C. Jeter, III, v State of South Carolina  
Appellate Case No. 2017-001777

Dear Honorable Kitchings:

Enclosed for filing, please find the Motion For Preliminary Injunction, and Certificate of Service for the same.

Enclosed, please also find an additional copy of the said documents, along with a self-addressed stamped envelope. Please return to me, file-stamped copies of these documents by way of the enclosed SASE.

Thank you for your assistance in this matter.

Sincerely, 

Alonzo C. Jeter, III

CC: Vann Henry Gunter, Jr., Esquire

Alonzo C. Jeter, III, #282902  
Tyger River Correctional Institution  
200 Prison Road  
Enoree, South Carolina 29335

**RECEIVED**

SEP 16 2020  
SC Court of Appeals



The Honorable Jenny Kitchings  
Clerk, SC Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED**

SEP 14 2020

MAILROOM