



ADAMS & BISCHOFF, LLC
— CRIMINAL DEFENSE LAWYERS —

CHRISTOPHER W. ADAMS

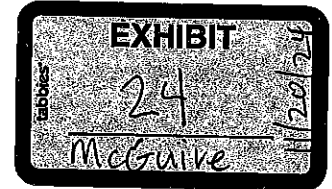
J. SCOTT BISCHOFF, II

WILLIAM S. MCGUIRE

October 28, 2024

VIA HAND DELIVERY

Judicial Merit Selection Commission
104 Gressette Senate Office Building
1101 Pendleton Street
Columbia, SC 29201



RE: Complaint regarding the Honorable Deadra L. Jefferson

Dear Sir or Madam:

My name is William Sean McGuire. My address is *Redacted*, Mount Pleasant, South Carolina, *redacted*. My cell number is *Redacted* and my office number is 843-277-0090. Judge Jefferson attempted to have me withdraw a motion in a capital case by having the Chief Justice of the South Carolina Supreme Court request that my employer pressure me into withdrawing the motion. This was when I was the Chief Attorney at the Capital Trial Division at the South Carolina Commission for Indigent Defense. My boss stated that Judge Jefferson and Chief Justice Jean Toal had communicated and that, at both of their requests, he was requesting that I withdraw the motion. My boss, Patton Adams, stated that failure to do so would alienate Jean Toal and the entire South Carolina Supreme Court. He further stated that it would be unwise to do so. Another Capital Defender, Boyd Young, heard most of this conversation, as he was nearby in the common area outside of my office. Mr. Young's address is *Redacted*, Columbia, SC, *redacted* and his phone number is *redacted*. This was in the fall of 2009.

Judge Jefferson has, in her communications to another circuit court judge, attributed false statements to me. In July of this year, I was trying a murder case in Charleston County before Judge McMaster. Judge Jefferson demanded that I be pulled out of the middle of that trial to do a bond hearing before her at approximately 1 p.m. I had earlier requested that I be excused from appearing given the fact that I was in the middle of a murder trial. That request was denied, and I had to appear before her. I wanted to have a word with my co-counsel, Scott Bischoff, about how to deal with Judge Jefferson's request, but I was told by a intern in my office that Mr. Bischoff had just gone into Chambers with Judge McMaster and the prosecutors. I requested that my bond hearing be continued, because I believed that Judge Jefferson's demand that I leave a murder trial for a bond hearing was retaliatory for me standing up to her unethical and immoral behavior in the Broughton trial mentioned above.

I also stated that I believed her behavior to be retaliatory for filing a FOIA request in an effort to determine why it took 8 months to schedule a bond setting or reconsideration motion under her docket management. I also stated that I was in the middle of a murder trial, where I was lead counsel, and that my co-counsel was in Chambers at the time. After being released by judge Jefferson, I returned to the murder trial. My co-counsel advised me that Judge McMaster stated that Judge Jefferson called his chambers and stated that I requested my bond hearing be continued because I told Judge Jefferson that "Judge McMaster was making decisions essential to my case while in chambers in my absence." I did not make such a statement. Scott Bischoff can be reached *redacted* and his business address is 171 Church Street, Suite 360.

Judge Jefferson will not effectively manage a docket. It takes approximately 8 months to have a bond setting or reconsideration motion scheduled. I filed a FOIA request with the clerk's request to determine why it was taking so long.

Judge Jefferson is habitually late when starting court in the morning, and is habitually late returning from a lunch break. I had to confront her with this while trying the case of State v. Kevin Chase. I needed to take up a matter in the morning outside the presence of the jury. Judge Jefferson took the bench late in the morning and stated that the jury had been waiting to get started for a long time, and that I needed to call a witness so that the jury could enter the courtroom. I stated that the lawyers were always on time in the morning but that the Judge never started court on time, and that I needed to have a ruling on a legal matter that pertained to the next witness being called. She stated that I should call another witness, and that her tardiness was attributed to attending to other business like signing orders. I do not remember how the issue was resolved. This was around 2002.

Judge Jefferson, as stated above, is habitually late for court. She will often state, when court resumes, is "have you had enough time to speak with your client." She will state this even when no request was made to delay court for the purpose of such a conversation. Presumably, this is so that the record would reflect a reason for a late start in starting or resuming court.

Judge Jefferson does not have the acumen necessary to be a circuit court judge. I was representing a fellow involved in a bit of an upscuttle while appearing before a family court judge. I had interviewed and put under subpoena that judge. Judge Jefferson quashed the subpoena on the ground that judge's should not lend the prestige of the robe in vouching for one's character. She then put on the record the next day, that she had called the judge and found that his testimony would not have been helpful to my case. Judge Jefferson became very angry when I explained that it was not proper for her to take a private proffer, and then put such a a finding on the record. This was around 1998.

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Best regards,

A handwritten signature in cursive script, appearing to read "Bill McGuire".

William S. McGuire
WSM/Ins

Enc.: Complaint and Affidavit

JUDICIAL MERIT SELECTION COMMISSION

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In the Matter of:
Candidate for

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**WITNESS AFFIDAVIT
FORM**

I will appear to testify concerning the qualifications of the above-named candidate and will produce all documents in my possession, if any, which will further develop or corroborate my testimony.

I understand that this written statement and all supporting documentation, if any, must be completed and the hard copies of all such documents shall be returned to the Judicial Merit Selection Commission by the deadline for complaints in order for the Commission to hear my testimony, and that the deadline for complaints is **12:00 Noon, Monday, October 28, 2024**. I understand I must be available to testify at the Public Hearing, and **failure to appear will result in a dismissal of my complaint.**

In regard to my intended testimony, I will offer information as to the following:

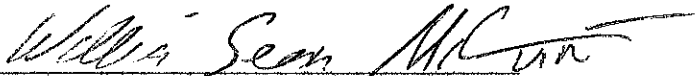
- (1) Set forth your full name, age, address, and both home and work telephone numbers.
- (2) Set forth the names, addresses, and telephone numbers (if known) of other persons who have knowledge of the facts concerning your testimony.
- (3) State the nature of your testimony regarding the qualifications of the above-named judicial candidate, including:
 - (a) specific facts relating to the candidate's character, competency, or ethics, including any and all allegations of wrongdoing or misconduct on the part of the candidate;
 - (b) specific dates, places, and times at which or during which such allegations took place;
 - (c) names of any persons present during such alleged actions or possessing evidence of such alleged actions; and
 - (d) how this information relates to the qualifications of the judicial candidate.
- (4) Set forth a list of and provide a copy of any and all documents to be produced at the hearing which relate to your testimony regarding the qualifications of the judicial candidate.

(5) State any other facts you feel are pertinent to the screening of this judicial candidate.

I understand that the information I have provided herein is confidential and is not to be disclosed to anyone except the Judicial Merit Selection Commission, the candidate, and counsel.

WAIVER

I further understand that my testimony before the Judicial Merit Selection Commission may require the disclosure of information that would otherwise be protected by the attorney-client privilege. Therefore, in order that my complaint may be fully investigated by the Commission, I hereby waive any right that I may have to raise the attorney-client privilege as that privilege may relate to the subject of my complaint. I further understand that by waiving the attorney-client privilege for this matter, I am authorizing the Commission to question other parties, including my attorney, concerning the facts and issues of my case.



Signature

Sworn to me this 28 day of October, 2024

 L.S.
Notary Public of South Carolina

My commission expires: 01/25/2034