

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

DOCKET NO: 2022-001482

**RECEIVED**

**Nov 28 2022**

**S.C. SUPREME COURT**

Denis Yeo,

Petitioner,

v.

Lexington County Assessor,

Respondent.

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**REPLY TO RETURN TO PETITION  
FOR A WRIT OF CERTIORARI**  
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Denis Yeo  
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Pro Se  
November 28, 2022

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Attorney for Respondent

The Respondent has chosen not to answer any of the issues raised by Petitioner in the Petition before this honorable court, choosing rather to submit - without substantiation - that Petitioner's arguments lack novelty and constitutional significance. Respondent has confused the novelty of the issues involved with an alleged lack of novelty in Petitioner's arguments. Respondent has failed to show wherein the issues presented lack novelty and constitutional significance. The unjust enrichment of the tax collector based on a strained and forced construction of the Code in the tax collector's favor is a constitutional issue of very significant proportions.

For the reasons above, Petitioner prays that Respondent's submittal be rejected and that a Writ of Certiorari be granted.

Respectfully submitted,

  
Denis Yeo

November 28, 2022