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Dec 14 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of
Appeals

APPEAL FROM CHARLESTON
COUNTY
Court of Common Pleas

Bentley D. Brice, Circuit Court Judge

Civil Court Case No. 2021-CP-10-2682
Court of Appeals Case No. 2022-000775

Pet Helpers, Inc.

Respondent,

v.

Janet L. Frisco,

Appellant,

v.

Melissa Susko

Third-Party Defendant

**RETURN TO RESPONDENT'S MOTION TO STRIKE MATTERS FROM
APPELLANT'S DESIGNATION OF MATTER**

Appellant, Pro Se, returns to Respondent's Motion to Strike Matters from Appellant's Designation of Matter and states that all matter included on the Appellant's Designation of Matter was presented to lower court or tribunal in compliance with Rule 210 (c) of the South Carolina Appellant Court rules and copies of the contested documents will be included here to prove that they were presented to the trial court and therefore should not be struck from the Appellant's Designation of Matter as requested in the Respondent's Motion.

Rule 210 (c) States: "Matter contained in the Record on Appeal shall be arranged in the following order: the title page, index, orders, judgements, decrees, decisions, pleadings, transcript, charges, exhibits and other materials or documents, and a certificate by appellant."

The following documents were filed with the Court of Common Pleas, 9th Circuit Clerk of Court and presented to the trial court by the Defendant and are attached for the Court's inspection to rebut Respondents A, B, and C challenges to the record and all fall under Rule 210 (c) as "exhibits and other materials or documents":

- a. "Appellant's matter number 9, Defendant's Objection to Plaintiff's Motion to Reconsider Consolidation with previous case of abuse of discretion by Court of Common Pleas in 2005, with Exhibits."

(EXHIBIT A): Defendant's Objection to Plaintiff's Motion to Reconsider Consolidation filed November 19, 2021. Appellant did not write "with Exhibits" in her Designation of Matter as the Respondent claims in his motion to strike. This matter falls under the category of other materials or documents as stated in Rule 210 (c). The Respondent's attorney does not want this previous case included in the matter because it shows the lower court has abused civil process and the standard of discretion in the past.

- b. Appellant's matter number 11, Police Report Disclaiming Trespass

(EXHIBIT B): Objection to Defendant's Motion to Dismiss and Counterclaim for Malicious Prosecution, Exhibit D, filed July 16, 2021. The Respondent's attorney made false statements on court documents that Defendant had trespassed in order to obtain restraining orders and that's the reason for his motion to strike this matter.

- c. Appellant's matter number 12, Tax Map of Pet Helper's Property

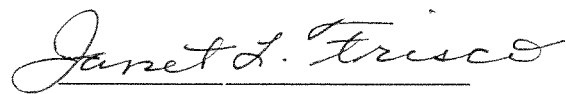
(EXHIBIT C): Defendant's Supplement in Objection to 2nd Motion for Restraining Order and Injunctive Relief Exhibit A, filed August 13, 2021. The tax map of Pet Helpers' business was mentioned in the police report and proves that the Defendant was not on Pet Helpers property and did not violate the No Trespass Notice as Plaintiff's attorney claimed on a filed court document.

Based on the foregoing, Appellant opposes striking of Appellant's matter numbers 9, 11, and 12 because they are not improper and were submitted to the trial court and therefore respectfully requests that this Honorable Court not strike or issue an order striking these matters from the record or ordering the Respondent to amend Initial Brief. As included in Respondent's Initial Brief, the Respondent's attorney is trying to cover up his client's fraudulent

behavior and avoid legal repercussions for himself and his client by not permitting Defendant to present substance and evidence that has critical bearing on the case. The respondent seeks to strike Matter number 9 because it shows that that the Court of Common Pleas has abused both the standard of discretion and civil process in the past by protecting magistrates that assisted an individual in committing fraud and ruling in favor of that individual in Janet Frisco v. Debra Walker in 2005.

The Respondent's attorney is using the Motion to Strike as a delay tactic and to prevent relevant information from being included in the appeal as he succeeded in doing in the lower court.

Respectfully submitted,



Janet L. Frisco, Pro Se Appellant,
203 Cardinal Drive
Summerville, South Carolina 29485
843-804-0875
Janetfrisco@yahoo.com

DATED: December 14, 2022

EXHIBIT
A

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT COURT
CASE #:2021-CP-10-2848

DEFENDANT'S OBJECTION TO PLAINTIFF'S
MOTION TO RECONSIDER CONSOLIDATION

JANET L. FRISCO,
PLAINTIFF

Vs.

PET HELPERS, INC. & MELISSA SUSKO
DEFENDANTS

2021 NOV 19 AM 9:26
JULIE J. ARMSTRONG
CLERK OF COURT

FILED

CURRENT TWO CASES INVOLVING THE PARTIES SHOULD NOT BE CONSOLIDATED AS REQUESTED IN PLAINTIFFS MOTION TO RECONSIDER MOTION TO CONSOLIDATE BECAUSE COURT OF COMMON PLEAS HAS EXHIBITED BIAS IN THIS CASE AS IN A PREVIOUS CASE #2005CP100368 JANET FRISCO VS. DEBRA WALKER:

I object to my complaint #2021CP102848 against Pet Helpers, Inc being consolidated into their complaint #2021CP102682 because the merits of my case have not been considered and my *Motion to Amend My Answer* filed on October 19, 2021 has not been scheduled for a hearing. Pet Helper's attorney has been given preference by the court in his motions to place restraining orders on me which he told blatant lies in order to attain. After which he made two motions to show cause which resulted in me paying a sanction of \$5434.32 to pay for his lawyer fees and court costs. I was jailed for four days for contempt of court because I didn't comply with the restraining orders that were created by plaintiff's legal counsel to cover-up Pet Helpers fraudulent behavior in faking the adoption of my dog Toby and soliciting donations based on a fabrication that they had found him a good home. My objections and motions that I have filed in Case #2021-CP-10-2682 have been ignored by the court while they consistently favored Pet Helpers' complaint against me throughout the litigation.

Now contrary to Mr. Futeral's claim that I had no injury on which to base a claim, I can adamantly say that I have unjustly been charged \$5434.32 to avoid serving a thirty-day sentence in which I suffered an untold amount of mental duress and hardship for four days of incarceration. I should be compensated for that by the plaintiffs as well as refunded the entire amount of money I had to pay to Mr. Futeral to be released from jail.

Pet Helpers took Toby under false pretenses and he suffered the entire time he was with them waiting for me to return and bring him home. I would have immediately done so if they had allowed me to, but they wouldn't because they wanted to use Toby to solicit donations claiming he had been adopted. They didn't care how much suffering they inflicted on him or me. When I protested, Ms. Susko and Pet Helpers turned their lawyer loose on me and he has done everything in his power to literally destroy me aided by the Court of Common Pleas who has cooperated almost 100% in everything he has demanded during this litigation. I am submitting the complete history of my previous experience with the court in 2005 Janet Frisco Vs. Debra Walker to show that even though my case was ironclad against Ms. Walker after she attempted to steal my car through the courts, she was protected and favored by all the

Charleston County courts in North Charleston Magistrate Court of David Coker, Small Claims Court of James Turner and finally in the Court of Common Pleas with Markley Dennis.

The plaintiffs are basing their motion for consolidation on Rule 42 (A) SCRPC Which states "when the two actions involve a common question of law", but the two cases do not involve a common question of law. Plaintiffs claim I libeled and slandered them in their lawsuit, but they are using the lawsuit and the allegations of libel and slander against me to cover-up a crime of fraud and portray me as a liar when in fact they are the party that is practicing deceit not only to me but to their donors and to the Bissell corporation that was subsidizing Pet Helper's low-cost adoption event on May 7th-9th 2021. There is no common question in the two lawsuits so consolidation of the two cases should not be allowed by the court, because the two cases are based on entirely different issues. There was no liable or slander by me against Pet Helpers. Everything I said is true except that I mistakenly I assumed they had euthanized him after the alleged adoption because I heard from a previous employee that Ms. Susko was certified to euthanize and had previously been involved in the deaths of two dogs when she worked for Pet Helpers. I never violated the No Trespass Order or tried to manufacture evidence by registering Toby's chip as their legal counsel claimed. I never broke any laws or threatened anyone while protesting and the restraining orders should never have been granted because they were an attempt to silence the truth about what happened to me at Pet Helper's after I surrendered Toby to them on April 13, 2021. These are cruel and greedy people who are trying to cover up fraud they committed just like Ms. Walker did in the 2005 case that follows. Both parties committed fraud and were then protected by law enforcement and the court system. Pet Helper's complaint should be dismissed, I should be refunded the sanction I paid to secure my release from jail and Toby should be returned to me. I will then agree to withdraw my complaint against them and not take further legal action.

HISTORY CASE #2005CP100368

In October of 2004 my 1990 Honda Accord was stolen by someone my son was living with at the time. When I found out about the theft I called and then went by the Dorchester County Sheriff's Department on 3/5/05 in person, but they refused to make a stolen car report because they said they didn't know the jurisdiction of the crime because I didn't know where my son was living. When I asked Lt. Barnhill and Lt. Thomas Marshall how I was supposed to turn in my tags or cease my car insurance, he said I had a problem. Later I found out from the highway department if there is no stolen car report, the car is considered "abandoned". I paid the taxes and renewed the registration and tags for the vehicle on 12/09/05. On 2/25/05 I received a *Notice to Claim Vehicle/Item of Personal Property* from North Charleston Magistrate David Coker that I had 30 days to reclaim my car and I owed a storage fee of \$2666 or the car would be auctioned off. The individual who claimed to have stored my car was using SC Statue 29-15-10 that can only be legitimately used by "a proprietor, owner, operator of a towing company, storage facility or repair shop that repaired or furnished any materials for repair" as the statue states. I called the individual, Debra Walker, assuming she was a towing or storage facility, but when I asked her where she found the car, she said a friend of her daughter's had brought it to her house. Shocked I replied that was probably the person who stole the car. I called her back a few days later because the notice said I had the right to inspect the car and she said the wheel was off. While I was on the phone with her, I asked her why she hadn't tried to find the owner of the car and she asked me why I didn't try to find the car. After this conversation I went to see Judge Coker thinking he was unaware of

the situation, but he only told me I could pick up my car and "not to make a fuss". Then I went to the City of North Charleston Police on March 12, 2005 and told them I wanted to report a stolen car since I now knew its' location. I asked for a police escort to Ms. Walker's home and called Jennings Towing to take my vehicle to Rick Hendrick's Honda on Savannah Highway. When the police and I arrived at her residence my car was parked on the street in front of her house. Ofc. Gann knocked on her door, she Ms. Walker waved at me and a young girl came out of the house and removed a fishing pole and other items from my car. I asked the police officer to write a report, but he was reluctant because he said I had retrieved my property. He also said he was leaving and I told him that I didn't feel comfortable waiting for the tow truck in front of the house where my stolen car was located. When I got the report a few days later, it said my son didn't remember where he had left his car which I never at any time said concerning the car so that was completed fabricated by the officer. I said he wouldn't tell me where he was living when the car was stolen and I found out later he was afraid to because the person who stole the car pointed a gun at his head and warning him not to report the theft.

When I had the car inspected at Rick Hendrick's Honda, they said the suspension was damaged and it would cost approximately \$1000 to repair it. I had also paid insurance on the car the entire time it was in Ms. Walker's possession. A hearing was scheduled in Judge Coker's magistrate court for 4/1/05, but Ms. Walker did not appear. I filed a complaint in the North Charleston Small Claims Court with Judge Turner asking for damages, but Judge Turner said we "were both innocent" and ruled in her favor on 8/5/05 even though she had committed fraud by attempting to gain ownership of the car through the Charleston County Magistrate Court and admitted during the hearing that she "just wanted the car for her daughter". She had violated a federal law when she submitted SCHED Form 5027-A to the highway department, *The Driver's Privacy Protection Act of 1994-18 USC, Chapter 123 as Amended*. I appealed his ruling on 8/12/05 and it was denied on 8/17/05. On 9/9/05 I filed a claim with the Charleston County Court of Common Pleas requesting a jury trial. When I came to the hearing on the appointed day, a court clerk told me Ms. Walker had not been notified to come and Judge Markley Dennis dismissed the case. The public record reflects that my case was disposed by nonjury trial on 1/27/06.

I was tempted to take the case to the Federal Court because Ms. Walker had broken a federal law when she went to the SC Highway Department and requested my vehicle information, but I thought I would probably be wasting my time and the filing fee there, too. Judges David Coker was involved in trying to launder my car through his court. Judges Turner and Dennis were both involved in protecting Judge Coker and in the cover-up afterwards. Ms. Walker was in possession of stolen property and had knowingly attempted to gain ownership of my car by claiming she had stored it when she wasn't a storage facility and should have reported the car to the police so they could have restored it to its' rightful owner. The obvious conclusion is that the Dorchester County Sheriff's Department, North Charleston Police Department, North Charleston Magistrate Court, North Charleston Small Claims Court, and Charleston County Court of Common Pleas were all involved in the cover-up of car theft.

The actions of these courts are available on the Charleston County Public Record case #2005CP1003681 Janet Frisco vs. Debra Walker and confirm that the courts did not take any action against Ms. Walker and ruled in her favor although she had been in possession of stolen vehicle and illegally obtained personal information on my car from the South Carolina Highway Department for the purpose of gaining ownership. Ms. Walker did so with the assistance of law enforcement and the judicial system in Charleston County. Tragically these activities date back many years and are manifest in my current situation with Pet Helpers, Inc.

TIMELINE OF CASE 2005CP1003681

- 10/04** - My 1990 Honda Accord is stolen from the residence where my son, Charles A. Frisco is living.
- 12/09/04** - After finding out that from him that his roommate took the car while he was out, I call the Dorchester County Sheriff's Office to report it. Then I went in person to the DCSO to report the car stolen and Lt. Barnhill refuses to take a report because don't know where the car was stolen from.
- 01/26/05** - Debra Walker files a *REQUEST FOR VEHICLE INFORMATION (FORM 5027-A)* with South Carolina Highway Department checking box #7 which reads "For use in providing notice to owners of towed or impounded vehicles" and *REPORT OF UNCLAIMED VEHICLE (FORM TR-2)* checking box "Reporting and Requesting Information".
- 02/08/05** - I pay \$14.13 taxes on the vehicle with the County of Dorchester.
- 02/09/05** - I renew my registration and tags on the Honda.
- 02/09/05** - Debra Walker receives information from the SCHD that the car is not stolen (since there's no stolen car report).
- 02/25/05** - I receive a certified letter from Magistrate David C. Coker *NOTICE TO CLAIM VEHICLE/ITEM OF PERSONAL PROPERTY* which states that my vehicle has been stored since October 13, 2004 and has accrued storage fees of \$2660.00 saying it will be sold in a magistrate's sale if unclaimed with Ms. Walker's contact information.
- 03/05/05** - I go to the North Charleston Police to report the vehicle as stolen since I know it's located at Ms. Walker's home. Ofc. Alston tells me to go to Judge Coker and explain the situation.
- 03/08/05** - I spoke with Judge Coker and he said I can request a hearing and I can pick up my car.
- 03/12/05** - I return to the North Charleston Police Department to report the car stolen and request that Ofc. Gann follow me to Ms. Walker's home to meet Jennings Towing. I request that the officer file a report concerning the incident. The car is towed to Rick Hendrick's Honda on Savannah Highway. The report states in error that my son didn't remember where he left the car.
- 03/17/05** - I return to Judge Coker and schedule a hearing for 4/1/05 and Ms. Walker is summoned.
- 04/01/05** - Ms. Walker does not appear at the hearing and Judge Coker says, that I got my car back and the matter is finished in his court.
- 04/27/05** - I turn in my tags to SCDMV.
- 04/29/05** - I cancel my insurance on the Honda effective 3/18/05 with Charles Chitwood State Farm.
- 05/13/05** - I receive a refund from State Farm in the amount of \$178.35
- 06/17/05** - A supplement to correct the North Charleston police report #2005009502 by is added by Lt. Tetanich at my request.
- 06/19/06** - I write Governor Mark Sanford concerning the story.
- 06/29/05** - I request copies of forms 5027-A and TR-2 as per Section 56-3-520 (B) under Article 4 that Ms. Walker filed with SCHD and release of my motor vehicle registration and licensing under Chapter 3.
- 06/05** - I file a complaint against Ms. Walker in the Charleston County Small Claims Court asking for \$2893.43 for damages, towing and insurance costs which is scheduled for 8/5/05.
- 07/18/05** - I request forms 5027-A and TR-2 under Section 56-3-520 (B) from the SCHD that were illegally submitted by Debra Walker to obtain information on my vehicle.
- 08/05/05** - Judge James Turner rules in favor of Ms. Walker.
- 08/10/05** - Faxed copies of Form 5027-A Ms. Walker illegally submitted to SCHD to Calvin Jones with FBI per his request.
- 08/12/05** - I appeal and file a motion for a new trial in case #2005-SC-87-0481 against Ms. Walker.
- 08/17/05** - My motion for a new trial is denied in small claims court.
- 08/24/05** - I pay fees at the SCDMV in Columbia, SC for information on my vehicle's current status.

09/09/05 - I appeal and file a complaint with the Charleston County Court of Common Pleas case #05-CP-10-3681 requesting \$2893 in damages plus court costs demanding a jury trial.
09/09/05 - I write to Mr. Edward Wicker with the SCDMV concerning Ms. Walker's fraudulent use of Form 5027-A.
09/21/05 - Ms. Walker is served a summons by Charleston County Sheriff's Department.
09/22/05 - I receive a RETURN from the Small Claims Court Judge James Turner.
10/20/05 - I write another letter to SCHD concerning the fraudulent use of Form 5027-A and gave them Special Agent Calvin Jones with FBI contact information.
11/01/06 - I receive letter from my state senator Thomas L. Moore acknowledging correspondence I sent him concerning story.
12/02/05 - I receive letter from Charles Chitwood acknowledging receipt of my letter to him concerning the fraud that was committed and irregularities with the courts and law enforcement.
12/05/06 - I receive letter from The Supreme Court of South Carolina Office of the Disciplinary Counsel after reporting a complaint about Judge Davis Coker's involvement with laundering my car and they say they can't do anything.
12/11/06 - I write another letter to Governor Sanford concerning the story.
01/25/06 - I appear at hearing in the Court of Common Pleas and am told by a court clerk that Ms. Walker was not notified to be there. Judge Markley Dennis dismisses the case and it is ended by a non-jury trial according to Public Record as of 1/27/06.
02/02/06 - Last entrée in public record Form 4 in RE: order 2006 127 9990 mailed first class. I am not sure who it was mailed to, but I never received anything concerning the verdict in the case.
02/06/05 - Wrote letter to State Farm Insurance Company in Bloomington, IL relating the entire incident with Ms. Walker, the courts and law enforcement.
05/01/06 - Wrote letter to Dorchester County Sheriff's Department to the attention of Thomas Marshall relating the problems I had reporting the theft of my car and the subsequent lawsuits.
02/06/07 - I write a letter to Representative Henry Brown concerning the story.
03/07/07 - I write another letter to State Farm Insurance Corporate Office to the attention of Susan Mullinax concerning Ms. Walker, law enforcement and the courts and how they handled the theft and fraudulent activities surrounding it.
10/08/09 - Sold my 1990 Honda Accord for \$200.00 to a private party. According to Blue Book it had a value of approximately \$2000 if it was not damaged.

Case #2005CP1003681 PUBLIC RECORD ENTREES

05/18/05 - Non liquidated, civil converted cost
05/23/05 - Service Vanderhorst
06/17/05 - Answer
07/01/05 - Civil Court Default Date
08/05/05 - Civil court event
08/05/05 - Finding for defendant at non-jury trial
09/09/05 - Receipt #05-11475
09/09/05 - Civil appeal from small claims court
09/20/05 - Transfer to other court
09/20/05 - Findings for defendant jury trial
09/20/05 - Judgement Janet Frisco

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CASE NO: 2021-CP-10-2848

JANET FRISCO

Plaintiff,

vs.

**OBJECTION TO DEFENDANTS'
MOTION TO DISMISS AND
COUNTERCLAIM FOR
MALICIOUS PROSECUTION**

Pet Helpers, Inc. and Melissa Susko,
individually

FILED
2021 JUL 16 PM 3:47
JULIE J. ARMSTRONG
CLERK OF COURT

I, Janet Frisco, object to the Defendants' Motion to Dismiss and Counterclaim for Malicious Prosecution and respond as follows to the defendant's allegations:

DEFENDANTS FIRST DEFENSE

- 3) Humans and canine companions have possessed a well-known bond throughout the centuries. Canines have been referred to as "man's best friend" and are known for their loyalty, affection and protective traits toward their caretakers. In some cases when a caretaker dies, dogs have been known to lie on the graves of their caretakers and even refuse food. In similar fashion human beings suffer loss and heartache over canine companions that die or are lost. A true caretaker cares and provides for the welfare of their pets and must make decisions that the animal is unable to make for themselves such as rehoming or end of life issues. It is similar to a parent/child relationship in that the animal like the child is totally dependent and so a special bond is created that, when broken, results in emotions such as sadness that is exhibited in various ways. Dogs have been known to cower, cry tears in some cases, whine, pant and change facial expressions when abandoned. For Pet Helpers who see this daily my only explanation for their denial of the pain animals and caretakers experience at separation is that they lack empathy and are denying that my dog suffered while in their facility to cover their cruel actions. Dogs will also stand a windows or doors when caretakers leave the home and when they return, they exhibit behaviors such as wagging their tails and barking. Toby didn't realize I was leaving him there permanently and pictures taken the day of his surrender show he was smiling and wagging his tail. Afterwards, the pictures on the Pet Helpers website show a mournful face and tucked tail. Pet Helpers knows that I called on the phone and wrote emails with concerns about the dog's demeanor and requested that he be returned as early as April 23, 2021 (SEE EXHIBIT A).

DEFENDANT'S SECOND DEFENSE

4. I had just started a business and was advertising on Facebook prior to the incident with Toby called *O.C.D. Pruning and Landscaping Consultation* and was licensed and taking appointments, but because of being upset over Toby and later because Pet Helpers counsel filed the EX Parte Restraining Order and Injunction that required I change my profile and groups to private the momentum of that business was impeded and came to a complete stop (SEE EXHIBIT B). It's difficult to estimate the exact loss of income since it had just begun, but I wasn't able to devote the time necessary to start a new business due to my absorption with trying to help Toby. That's the cause of action that my business was injured at the onset because of the way I was treated by Pet Helpers during and after the surrender.

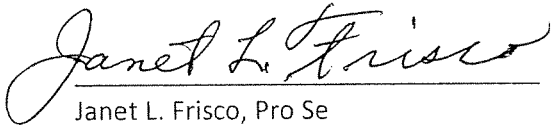
a) I'm not making a claim for Toby's distress. My complaint is concerning how I was so treated so deceitfully and disrespectfully by Pet Helpers and underwent so much stress. It doesn't matter that the merchandise was a dog. If I traded a car and got treated like that, I would be eligible to file a lawsuit. I paid them money and trusted them to act respectfully and honestly in a business transaction.

b) Pet Helpers was guilty of breach of trust. I trusted them and they betrayed that trust. They misrepresented themselves as animal advocates and were not transparent in the surrender transaction. For instance, they did not tell me about a low-cost adoption event that was beginning May 7, 2021, they did not try to work with me to find alternatives to surrendering my pet as their website states, they insisted the dog was fine when I could see he wasn't, they sent me an adoption application on May 7th and made me think I could adopt him and then lied he was adopted the morning of May 7th when the submission actually went in May 8th (SEE EXHIBIT C).

d) Melissa Susko, the executive manager, tried to falsely accuse me of violating the trespass notice on June 5 that she imposed after I became upset that they adopted the dog out from under me. One of her employees took pictures while another employee tried to entice me on to the Pet Helpers property by asking how I was. She admitted the man who took pictures was an employee and she admitted she wanted to prosecute on the incident report (SEE EXHIBIT D). If I hadn't filed a Freedom of Information Request with the City of Charleston Police and gone to Charleston County Register of Deeds and obtained the plat she might have succeeded in her evil plot. Their lawyer even threatened me in an email that the investigation could be reopened (SEE EXHIBIT E). I believe Ms. Susko ordered Katie in Intake to tell me Toby was adopted on the morning of May 7th. I believe she also told one of her employees, John Blaine, to feign he adopted Toby so I couldn't adopt him. She was dishonest, conniving and malicious in her treatment of me after I surrendered my beloved rescue, Toby. When I tried to talk to her after the supposed adoption, she rudely interrupted me and screamed through the phone, "You surrendered your legal rights!".

DEFENDANTS' THIRD DEFENSE AND COUNTERCLAIM (Malicious Prosecution)

I didn't file the action to exhort the defendant's into returning the dog although I think they should have and still could. I offered \$2000.00 to the adopter and I believe he is aware that I was very upset about what happened. If he had any compassion, he would have returned him to his rescuer who saved him from death and cared for him for eight months and only surrendered him because I thought I was doing what was best for him. I experienced a total disruption of my life due to the experience I had at Pet Helpers and they should be held accountable for treating a person who believed their advertising and media image. I will never get over how I was treated there because I unknowingly brought my dog Toby to them. They treated me like an object to be taken advantage of and they did the same thing to my dog. I should receive compensation for my business that was stalled, all the time I spent I've trying to reclaim Toby and filing responses to the excessively burdensome legal actions that have been filed against me by their lawyer. They put me through the worst experience of my life and I will never be able to forget how I betrayed Toby's trust. I know the courts don't have the power to order the return of the dog, but I hope the lawsuit will expose Pet Helper's treachery so no unsuspecting person ever gets taken in by their misrepresentations again.



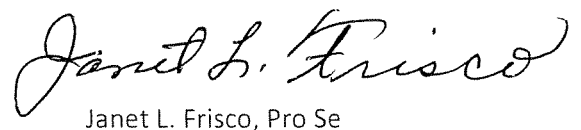
Janet L. Frisco, Pro Se
203 Cardinal Drive
Summerville, SC 29485s
843-804-0875
janetfrisco@yahoo.com

Dated: July 16, 2021

CERTIFICATE OF SERVICE

The foregoing document *Objection to the Defendants Motion to Dismiss and Counterclaim for Malicious Prosecution* was served on the following by email and U.S. Mail with sufficient postage affixed, this 16th day of JULY 2021.

Stephan V. Futeral
1004 Anna Knapp Blvd., 2nd Floor
Mount Pleasant, South Carolina 29464
Email to: sfuteral@charlestonlaw.net
Attorney for Defendants



Janet L. Frisco, Pro Se

Exhibit A

Mail body: Fw: Received Email Re: Toby

Sent from Yahoo Mail on Android

----- Forwarded Message -----

From: "Janet Frisco" <janetfrisco@yahoo.com>
To: "intake pethelpers" <intake@pethelpers.org>
Sent: Fri, Apr 23, 2021 at 2:06 PM
Subject: Re: Received Email Re: Toby

Katie, Could I please come there and get Toby back tomorrow. I thought I was doing the right thing for him, but he doesn't look happy at all in the pictures. He's had a rough life and I can't let him down like the hunter who previously owned him

Janet Frisco

Sent from Yahoo Mail on Android

On Fri, Apr 23, 2021 at 2:06 AM, intake pethelpers <intake@pethelpers.org> wrote:

Thank you for contacting the Intake Department at Pet Helpers. We have received your email and are working very hard finding animals homes and will get back to you with in 24 to 48 hours. If this is an emergency, please call the shelter directly 843-795-1110.

****Note in our "peak seasons" it may take us longer to respond.****

Intake Department
1111 Boldry Road, Charleston, SC 29401
843-795-1110 or 843-795-1110

<http://www.pethelpers.org/>

Get Trey Taylor Tickets at:

<https://charleston.boldrypetickets.com/events/111137472/an-intimate-evening-with-trey-taylor>

The information contained in this email, and any attachments hereto, is from Pet Helpers, Inc. and is intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient of this email, you are hereby notified that any dissemination, distribution, copying or use of the contents of this email, and any attachments hereto, is strictly prohibited. If you have received this email in error, please immediately notify me by reply email and permanently delete the original and any copy of this e-mail and any printout thereof.

BUSINESS LICENSE

Expires April 30, 2022



Janet Frisco dba O.C.D. Pruning & Landscaping
Consultation
203 Cardinal Dr.
Summerville, SC 29485

License No	21-04149	Type	New Home Business
Issued Date	05/12/2021	Business	Janet Frisco dba O.C.D. Pruning & Landscaping
Expiry Date	04/30/2022	Address	203 CARDINAL DR
		Activity	561 - Administrative and support services

Subject to the provisions and applicable statutes and ordinances and such provisions and regulations as may at any time be imposed by the State of South Carolina or County Government.

*****NOTICE TO BUSINESS OWNER/OPERATOR*****

This license must be displayed at all times on the original form, in a conspicuous location, on or in the business establishment and/or location for which it has been issued, as required by Dorchester County Ordinance 17-27, Section 8.

NON-TRANSFERABLE

Director of Business Services



Pet Helpers
1447 Folly Road
Charleston, South Carolina 29412 USA
msusko@pethelpers.org
https://www.pethelpers.org/index.html

Person ID: [REDACTED]

"Slim Jim"

Animal Information

Animal ID: A47529858	Name: Slim Jim	Types: Dog	Gender: Male
ARN: Toby	DOB: 4/13/2020	Breeds: Hound/Mix	Altered: Yes
Chip #: 982091063428429	Current Age: 1 y 0 m 25 d	Colors: Brown/White	Size: Large
Type: 24PetWatch	Age Group: Adult - 1 year and older	Pattern: Tricolor	Weight: 50.20 pound

I, [REDACTED] (hereinafter Adopter), acknowledge receiving from Pet Helpers Adoption Center and Spay/Neuter Clinic (hereinafter Pet Helpers), custody of Slim Jim (microchip #: 982 091 063428429), and, in return consideration to Pet Helpers hereby promise and agree to the following:

1. Use as Companion Animal: [REDACTED] Adopter Initials

a. Adopter agrees that the animal will be kept only as a companion animal. The above-named animal will not be used for fighting, breeding, racing, or experimental/research purposes.

2. Animal Care: [REDACTED] Adopter Initials

- a. Adopter will, at his/her own expense, provide the adopted animal with adequate and proper quantities of wholesome food and water, safe and adequate shelter, proper and adequate exercise, training, appropriate veterinary attention, and, in general, treatment in accordance with the humane and prudent practices of animal care.
- b. Adopter shall comply with all city, county, and state laws and regulations, including but not limited to, those relating to care, housing, licensing, ordinances, etc.
- c. The animal adopted must live indoors and cannot be tethered or kenneled outdoors.
- d. Although your adopted animal is microchipped, adopter agrees to have an ID tag and collar on adopted animals at all times.
- e. Adopter shall provide heartworm and/or flea preventative for life of animal. If a canine is returned to Pet Helpers, adopters agrees to provide current heartworm test results at time of return. If tested positive, adopter shall be financially responsible for heartworm treatment.
- f. Adopter is aware of maintenance needs of the species being adopted. Adopter agrees that he/she will not declaw, crop, dock or otherwise mutilate any animal he/she is adopting from Pet Helpers unless in cases of medical necessity.

g. Adopter agrees that if any behavioral issues arise after adoption, the adopter will enlist help from the Pet Helpers staff by contacting our shelter immediately. Adopter also agrees to work with our shelter trainer who can assist in overcoming any issues that may arise.

3. Prior Animal Care Charges or Convictions: [REDACTED] Adopter Initials

a. Adopter represents that he/she has never been subject to legal action for cruelty to or neglect of animals. Adopter further represents that he/she has never owned an animal that has been confiscated by any animal control or humane organization for violations of state or local animal control regulations or animal adoption agreements.

4. Full Household Consent: [REDACTED] Adopter Initials

a. Adopter represents that all household members have agreed to the adoption of the animal and will abide by the terms of this agreement.

5. Tenant and zoning: [REDACTED] Adopter Initials

a. If the Adopter is a tenant, then Adopter agrees that he/she has permission from his/her landlord to own and possess this animal at his/her residence.
b. It is the responsibility of adopters to check local zoning and housing communities to ensure animal/breed is acceptable to live in such community.

6. No Guarantee Given Regarding Breed, Health or Temperament: [REDACTED] Adopter Initials

a. Adopter acknowledges and understands that Pet Helpers makes no claims as to the temperament, health, disposition, or general condition of this animal. Pet Helpers has provided the adopter, to the fullest extent possible, information about the health, history and background of the animal. The Adopter understands that animals at Pet Helpers come from a rescue environment in which little may be known about the animal's past. Hence, Pet Helpers cannot guarantee that this animal is free from all illness despite the organization's best efforts and due diligence to minimize and prevent disease transmission. The adopter accepts responsibility for the animal based on the information available and provided at the time of this agreement.
b. Pet Helpers does not perform DNA testing to determine the breed of our animals. All breeds are 'best guessed' and opinion may vary.

7. Release of Liability: [REDACTED] Adopter Initials

a. Adopter accepts possession of (subject to the conditions of the adoption contract), and responsibility for the animal adopted and agrees to release and discharge Pet Helpers, its agents, officers and directors, heirs or assignees forever from liability for any injury or damages to any person or property caused by the adopted animal, and from any causes of action, claims, suits, or demands whatsoever that may arise as a result of such injury or damages.

8. Transfer of Ownership: [REDACTED] Adopter Initials

a. The Adopter agrees not to sell, trade, loan, or give away the animal without the prior written consent of Pet Helpers. This adoption agreement is non-transferable.
b. Adopter agrees to notify Pet Helpers via email of any address or phone number changes so that we can keep our records current in case your pet gets lost and we are notified.

9. Return of Animal to Pet Helpers: [REDACTED] Adopter Initials

a. We at Pet Helpers seek forever homes for the animals that come through our shelter and encourage adopters to adopt our philosophy. Adopter can transfer the adopted animal into another home only after notifying Pet Helpers, giving us the first option of return and providing Pet Helpers with new adopters' information. Adopter will not be eligible for any refund of adoption donation fees or expenses.

However, if Pet Helpers can accept animal back into our shelter, all intakes are scheduled through our intake coordinator by appointment only.

10. Reservation of Rights: [Redacted] Adopter Initials

- a. Pet Helpers reserves the right to an ongoing review of this adoption at random, to follow up on any complaints or reports to protect the welfare of this animal. If the Adopter does not satisfactorily uphold any of the terms of this Agreement and/or if any misrepresentations have been made to Pet Helpers in order to obtain the animal, Pet Helpers reserves the right to void this Agreement and take immediate possession of the animal, wherever it is located. At such time the adopter's rights shall be terminated and adopter agrees that he/she shall have no direct cause of action or claim against Pet Helpers, its officers, directors, staff, or volunteers regarding such removal and termination of rights. In the event the Adopter fails or refuses to return such animal upon demand, he/she hereby agrees to pay Pet Helpers reasonable attorneys' fees in the event an attorney is consulted or if suit is brought for the return of the animal.

11. Copy of Contract: [Redacted] Adopter Initials

- a. Adopter acknowledges that he/she has received a copy of this Animal Adoption Contract signed by both parties.

I certify that I am over the age of 18 and lawfully competent to enter into this contract. I agree that all information provided in the Adoption Application and Adoption Contract is truthful to the best of my knowledge and belief. If it is found that any statements I have made on the Adoption Application and Contract are not true, the adopted animal can be confiscated.

[Redacted Signature] _____ 05/08/21
 Adopter Signature Date

[Redacted Signature] _____ 5/8/21
 Signature Date
 Agent, Pet Helpers Adoption Center

Exhibit D

INCIDENT/INVESTIGATION REPORT

Agency Name: Charleston Police Department
ORI: SC0100100

Case#: 21-08399
Date / Time Reported: 06/07/2021 16:28 Mon
Last Known Secure: 06/05/2021 16:30 Sat
At Found: 06/07/2021 12:15 Mon

Location of Incident: 1447 FOLLY RD, Charleston SC 29412
Gang Relat: NO
Premise Type: Parking Lot/parking
Beat/Tract: 323

IDENT DATA

Table with 3 rows for incident details (#1, #2, #3) including Crime Incident(s), Weapon / Tools, Entry, Exit, Security, and Activity.

MO

of Victims: 1 Type: BUSINESS Injury:

VICTIM

Victim details for V1: PETHHELPERS, including Home Address (1447 FOLLY RD), Home Phone (843-531-6161), and Vehicle information.

OTHER SOLVED

CODES: V- Victim (Denote V2, V3) O = Owner (if other than victim) R = Reporting Person (if other than victim)

Type: INDIVIDUAL/ NOT LAW ENFORCEMENT Injury:

Victim details for CO: SUSCKO, MELISSA, including Home Address, Home Phone (843-542-6292), and Employer (Pet Helpers, 1447 FOLLY RD).

Type: Injury:

Victim details for another entry, including Name, Home Address, Home Phone, and Employer.

PROPERTY

1 = None 2 = Burned 3 = Counterfeit / Forged 4 = Damaged / Vandalized 5 = Recovered 6 = Seized 7 = Stolen 8 = Unknown ("OJ" = Recovered for Other Jurisdiction)

Table with columns: VI #, Code, Status Frm/To, Value, OJ, QTY, Property Description, Make/Model, Serial Number.

Officer/ID#: BUREK, H. (PTL, TM3P) (2166)

Invest ID#: BROWN, Y. D. (PTL, TM3I) (1191) Supervisor: TAI, M. P. (PTL, TM3P) (1070)

Status: Complainant Signature, Case Status: Pending Inactive, Case Disposition, Page 1

INCIDENT/INVESTIGATION REPORT

Charleston Police Department

Case # 21-08399

Status Codes 1 = None 2 = Burned 3 = Counterfeit / Forged 4 = Damaged / Vandalized 5 = Recovered 6 = Seized 7 = Stolen 8 = Unknown

	IBR	Status	Quantity	Type Measure	Suspected Type
D R U G S					

Assisting Officers

Suspect Hate / Bias Motivated:

NARRATIVE

On June 7, 2021 at approximately 1215 hours I, Ofc. H. Burek responded to 1447 Folly Rd (Pet Helpers) in reference to Trespassing.

Upon arrival I spoke with Melissa Susko (W/F), the Executive Director of Pet Helpers/complainant. Susko stated that they have had an ongoing issue with a trespasser, Janet Frisco (W/F). On May 15, 2021 CPD Ofc. B. Gandy met with Frisco and advised her that she was on trespass notice. On June 5, 2021 around 1630 hours, Frisco violated the trespass order by coming onto the private property located at the abovementioned location. Susko provided photos to corroborate the violation.

Susko stated that in addition to trespassing, Frisco is also a safety hazard because she stands in the way of cars trying to exit the parking lot. She will also yell into the windows of cars as they pass by.

Susko stated that she wants to proceed with criminal prosecution against Frisco.

Susko was advised on the matter and provided with a CPD case number. Incident was captured on my body worn camera and uploaded to the Getac cloud per CPD policy.

CASE SUPPLEMENTAL REPORT

Printed: 06/23/2021 14:56

Charleston Police Department

OCA: 2108399

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

Case Status: *PENDING INACTIVE*

Case Mng Status: *PENDING INACTIVE*

Occurred: *06/05/2021*

Offense: *TRESPASS*

Investigator: *BROWN, Y. D. (1191)*

Date / Time: *06/09/2021 11:51:05, Wednesday*

Supervisor: *BROWN, Y. D. (1191)*

Supervisor Review Date / Time: *06/10/2021 09:13:29, Thursday*

Contact:

Reference: *Supplemental Report*

Incident Type: *Trespassing*

Incident#: *21-08399*

On June 9, 2021 I/O (Y. Brown) made contact with the complainant, Melissa Suscko via telephone (843-542-6292). Ms. Suscko explained that she was not on scene when the incident occurred and that another employee took the still images provided to CPD R/O Burek. I/O expressed to the complainant that there was reason to be concerned about the offender, Ms. Frisco presence at the incident location, Pet Helpers (1447 Folly Road) as this has been in an ongoing issues (Offender is also on Trespass Notice).

It should be noted that I/O along with Lt. Taylor reviewed the still images that was forwarded by Officer Burek. After the observation of the still images, there is reason to believe that the offender was not in direct violation of the Trespassing statute. The boundaries in which the offender, Ms. Frisco was standing would have to be viewed on a city property tax map as she was in the domain of the roadway and the incident location. I/O expressed this to Ms. Suscko who stated she was not certain of where she was standing but understood I/O's explanation. She was advised that CPD would continue to document all interactions requested, as this is an ongoing matter between the business and the offender. Ms. Suscko stated that she is working with the business attorney in regards to getting a restraining order in place against the offender (advised on how to obtain a copy of all incident reports).

Additionally, I/O made contact with the offender, Janet Frisco via telephone (843-804-0875) advising her of the incident report that was document on June 7, 2021. I/O expressed the above listed information to Ms. Frisco about the boundaries in which she was standing on the incident date. Ms. Frisco was advised to be certain she was not on the property while expressing herself. Ms. Frisco stated that she understood and noted that she was not on the property of Pet Helpers on June 5, 2021. She noted that she was not yelling but was only answering question(s) that an unknown man had asked of her. Additionally, Ms. Frisco contacted I/O via telephone to advise she was going to request a copy of this report from CPD Records Division.

Both conversations were audio recorded with I/O's CPD issued audio recorder. I/O will upload the still images to the CPD database. At this current, there are no additional leads in the investigation and all parties were advised of this information. This case will be placed in the pending inactive status.

Nothing Further.....

Investigator Signature

Supervisor Signature

Mail body: Fw: Buckle your seatbelt

Sent from Yahoo Mail on Android

----- Forwarded Message -----

From: "Janet Frisco" <janetfrisco@yahoo.com>
To: "Stephan Futeral" <sfuteral@charlestonlaw.net>
Sent: Thu, Jun 17, 2021 at 10:34 PM
Subject: Buckle your seatbelt
Ms. Frisco,

Today, you lost the first of several motions to come. We will be monitoring your online and offline activities for any future violations of the court's order that includes the post you made today on your "Justice for Toby" page. Apparently you did not pay attention when the judge cautioned you to keep this matter inside the courthouse and not engage online. I will be ordering the transcript of the hearing so you can read it for yourself. You should speak to a lawyer.

Regarding the claim of trespass, law enforcement is not the final arbiter of whether you trespassed; they are simply the arresting agency. The investigation can be reopened. What happens next regarding your trespass has nothing to do with me for it is not my decision to make. I will not discuss it with you any more, and you should speak to a lawyer.

As for your inquiry regarding microchipping, your legal rights regarding Toby ended the moment you gave him away. Accordingly, my clients do not have to answer to you regarding microchipping, their adoption process, who adopted the dog, whether the dog sleeps on a couch (which you seem fixated on), what day the dog was adopted, what the dog does during his day, or anything else regarding this dog. I will not discuss it with you any more, and you should speak to a lawyer.

(The fact that they didn't register the microchip on the day of the supposed adoption is more evidence there wasn't a legitimate adoption for me to use in my complaint. Pet Helpers deliberately and maliciously kept me from reclaiming the dog out of meanness and greed. A jury will make the decision after they hear all the facts and decide who was wronged.)

In court, you asked what the penalty may be for violating a court order. Under South Carolina law, Section 14-5-320 "the circuit court may punish by fine or imprisonment, at the discretion of the court, all contempts of authority in any cause or hearing before the same." As to the amount of a fine or the length of imprisonment, that is for the court to decide. Contempt of court is a very serious matter, and you should speak to a lawyer.

My office and the court will be in touch about scheduling our Summary Judgment Motion. Additionally, since the court was unable to hear our motion for contempt of court today, we will have that scheduled very soon.

(Pet Helpers and Susko should be hearing from civil process soon. I will object to the motion for the partial summary judgement until those legal actions are completed. As far as my being in contempt of court, you weren't listening to the judge apparently. It's unlikely I will be charged with contempt of court for not being able to totally shut down my social media. They have to prove it's intentional and it wasn't. Sorry to spoil you and Suskos plans, but I won't be getting locked up for contempt or trespassing.)

Best wishes,

Stephan Futeral, Esq.
Civil & Family Court Mediator, Futeral & Nelson, LLC

EXHIBIT C -

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CASE #:2021-CP-10-2682

JULIE L. JONES
CLERK OF COURT

2021 AUG 13 PM 4:51

FILED

Pet Helpers, Inc., PLAINTIFF

DEFENDANT'S SUPPLEMENT IN
OBJECTION TO 2ND MOTION FOR
RESTRAINING ORDER AND INJUNCTIVE
RELIEF

VS

Janet L. Frisco, DEFENDANT

I, Janet Frisco, submit this supplement in objection to *Plaintiff's Motion of 2nd Motion for Restraining Order and Injunctive Relief* against me. As I explained in my objection to the motion

my posts are not defamatory, but are a necessary for exposing the fraud and deception that I became aware of due to my surrender experience at Pet Helpers of my rescued hunting dog, Toby in April of 2021. The initial restraining order, and now the second restraining order, are an attempt by the plaintiff to conceal fraudulent activities involving Pet Helper's solicitation of donations presumably after staging adoptions like my dog Toby's, advertising the fake adoptions on their website to solicit donations, and then euthanizing the dogs. I became aware of this criminal activity because I didn't surrender

and never look back. I viewed the pictures on Pet Helpers website of the adoptable dogs because I had asked how I would know when he got adopted. The first time I viewed the

pictures I saw how devastated he looked and I knew I had made a mistake surrendering him. I began calling and emailing Katie in the Intake Department and voicing my concerns about the dog's unhappy state, but she kept downplaying my concerns and telling me he was fine. On April 23, 2021 I sent an email asking her if I could pick him up and take him home, but never got an answer. Then I received an email from Pet Helpers advertising the Bissell Low Cost (\$25.00) Adoption Event May 7-9th and I became very concerned about that and called again. She just said it was a nationwide program that they were participating in and tried to reassure me. I kept calling and asking how to get him back and she said I would have to speak to the manager, Melissa Susko, and later told me I would have to submit an adoption application which she emailed to me on May 6th. I submitted the application on the evening of May 7th, but Melissa Susko left me a voicemail that he had been adopted that morning. I didn't get message because my phone was being repaired, but I called on May 8th or 9th from another phone and Katie told me he was adopted on May 7th. I was shocked because I thought I was going to be able to get him back because Katie had sent the adoption application. After discovering this I went to their website and saw his adoption picture and Toby looked scared being led away by a large man wearing a

hat, mask, and glasses. I started calling and emailing again about the adoption and sent a long email to Melissa Susko asking her to explain to the adopter what had happened. She never replied

so I started calling and trying to reach her by phone. When she finally called me back, I was on my way over there. That's when she got rude and told me I didn't have any legal rights because I had

signed the surrender form. I started trying to explain my position and said I was on my way over and she said, "I'm going to interrupt you now." That's when I hung up on her, but I decided not to go to Pet

Helpers because it was obviously not any use to try and talk to her. I surmise she called the police right after she got off the phone and requested, they enforce a "No Trespass Notice" on me. I went over

there the next Saturday to protest, but I had an intuition to call the police and let them know and that's when they informed me of the trespass notice Ms. Susko had requested and also that if I called or

emailed Pet Helpers they would ask for a restraining order for harassment. I was really in disbelief that this was all happening because I had a very good impression of Pet Helpers having had my pets and

rescues altered there on many occasions. After I started protesting, their lawyer contacted me at first through commenting on a live video. I had been under the impression they euthanized Toby after the

adoption event because I knew that the "Happy Ending Update" they put on their website to solicit donations was fabricated. Toby was shown at the facility in the photo and the update said he was going

daily walks and cuddling on the sofa and I know he didn't go on walks or cuddle on furniture. When the lawyer sent me the adoption submission, I saw that Melissa Sisco and Katie in Intake had lied about

the adoption date and it was actually done on May 8th. Then I came across a picture of one of their employees named John Blaine and he strongly resembled the man in the adoption picture. On June 5th

while I was protesting, a motorist turned into Pet Helpers parking lot and stopped in the driveway.

Immediately after another motorist turned into their parking and lot and pulled in behind him. The man

had asked me if I was alright and I approached his driver's side window to speak with him and the other man behind him started taking pictures of me with his cell phone. On Monday June 7th, Melissa

Susko called the police and made a report alleging I had trespassed and gave him the photos the man in the second car had taken. She also said I was causing a safety hazard in their driveway, yelling into

car windows, that she had ongoing trespass issues with me and wanted to prosecute. I was not on Pet Helper's property, the police verified that in their final investigative report. That did not stop their

lawyer, Stephan Futeral from stating on his first restraining order motion that I had violated the trespass notice and repeating that at the hearing and threatening to reopen the investigation in an email to

me. I was then motivated to file a Freedom of Information request with the police and get the plat map from the Charleston County Registrar of Deeds that shows clearly that I was not trespassing.

I was dealt with very dishonestly by Pet Helpers in the surrender and afterwards by their lawyer Stephan V. Futeral. The man that supposedly adopted Toby on May 8th should be required to show a

picture identification card and be positively identified. A signed affidavit by John Baine that counsel provided as an exhibit on the second motion for a more restrictive restraining order is worthless when

you are dealing with people that are this dishonest. If the adoption of my dog Toby was legitimate, that should not be too hard to find out and that one truth is primary in determining who was wronged in this situation. If Pet Helpers refuses to offer that proof, it's because they are trying to hide something from the court with their lawsuit.

MY RESPONSES TO ARGUMENTS IN SUPPLEMENTAL MEMORANDUMS OF MELISSA SUSKO

1. I am not committing liable or slander against Pet Helpers, Inc. with my public statements on social media or with my signage while protesting on the public right-a-way in front of Pet Helpers. I really did think they killed Toby after they used him for soliciting donations because of the way they acted after the surrender lying about his condition and then telling me he had been adopted by someone else on May 7th. Melissa Susko ordered an employee, John Blaine, to adopt Toby on May 8th so they wouldn't have to return him and not be able to solicit donations for finding him a home. The affidavit he signed and was submitted at the virtual hearing on May 29th doesn't prove anything. Toby was treated like an object that couldn't experience sadness and they knew I was only trying to alleviate the distress he experienced because I abandoned him, but they didn't care about him or me because they just wanted to get donations. ~~(EXHIBIT~~
A) JF
2. I have not violated the "No Trespass Notice" Melissa Susko requested from City of Charleston Police after she tried to lure me onto the property to prosecute me on June 5 using two employees contrary to what Melissa Susko and their lawyer continue to claim. I was cleared in the investigation and made sure there was no cause to reopen the investigation as their lawyer threatened by acquiring the photos and the plat of Pet Helper's property from the Charleston County Registrar of Deeds. (EXHIBIT B) H JF
3. Pet Helpers complaint and subsequent restraining orders are an attempt to use the legal system to conceal fraudulent behavior---soliciting donations under false pretenses. They don't want me to talk about their clandestine criminal behavior so they are silencing and restraining me from exposing it.
4. Pet Helpers has harmed their own reputation by being deceitful and cruel and their complaint should be dismissed because they are using it to conceal fraud.
5. I was required to set my Facebook Account to private by the first restraining order. I haven't blocked "persons from Pet Helpers and Plaintiff's undersigned counsel from seeing {my} account". If the counsel is blocked, how is he acquiring all my comments that I made prior to the virtual hearing on May 29th and using them as exhibits on his legal documents?
6. Plaintiffs and their counsel have consistently lied and applied trickery in their attempt to hide their wrong doings.
7. Plaintiffs' counsel deliberately emailed me a bad link to exclude me from the virtual hearing on May 29th and then would not provide me with the password when I finally accessed the sign-in page after loading WEBX MEETING to my devices though I requested it repeatedly. He now accuses me of deliberately being absent from the hearing even though he planned for me not to be able to access it. (EXHIBIT C) B JF

8. Pet Helpers and their lawyer are using deception and trickery to prevail in these court actions.
9. Pet Helpers through their attorney is trying to prosecute, incarcerate and penalize me financially for exposing their criminal behavior and in that endeavor, they have lied and set traps for me.

Janet L. Frisco
Janet L. Frisco, Pro Se

Dated *August 13, 2021*

CERTIFICATE OF SERVICE

The foregoing document was served on the following by email and U.S. Mail with sufficient postage affixed this 13th day of *August* 2021:

Stephan V. Futeral
1004 Anna Knapp Blvd., Suite 3
Mouth Pleasant, South Carolina 29464
sfuteral@charlestonlaw.net

Janet L. Frisco

Janet L. Frisco, Pro Se

4 of 4

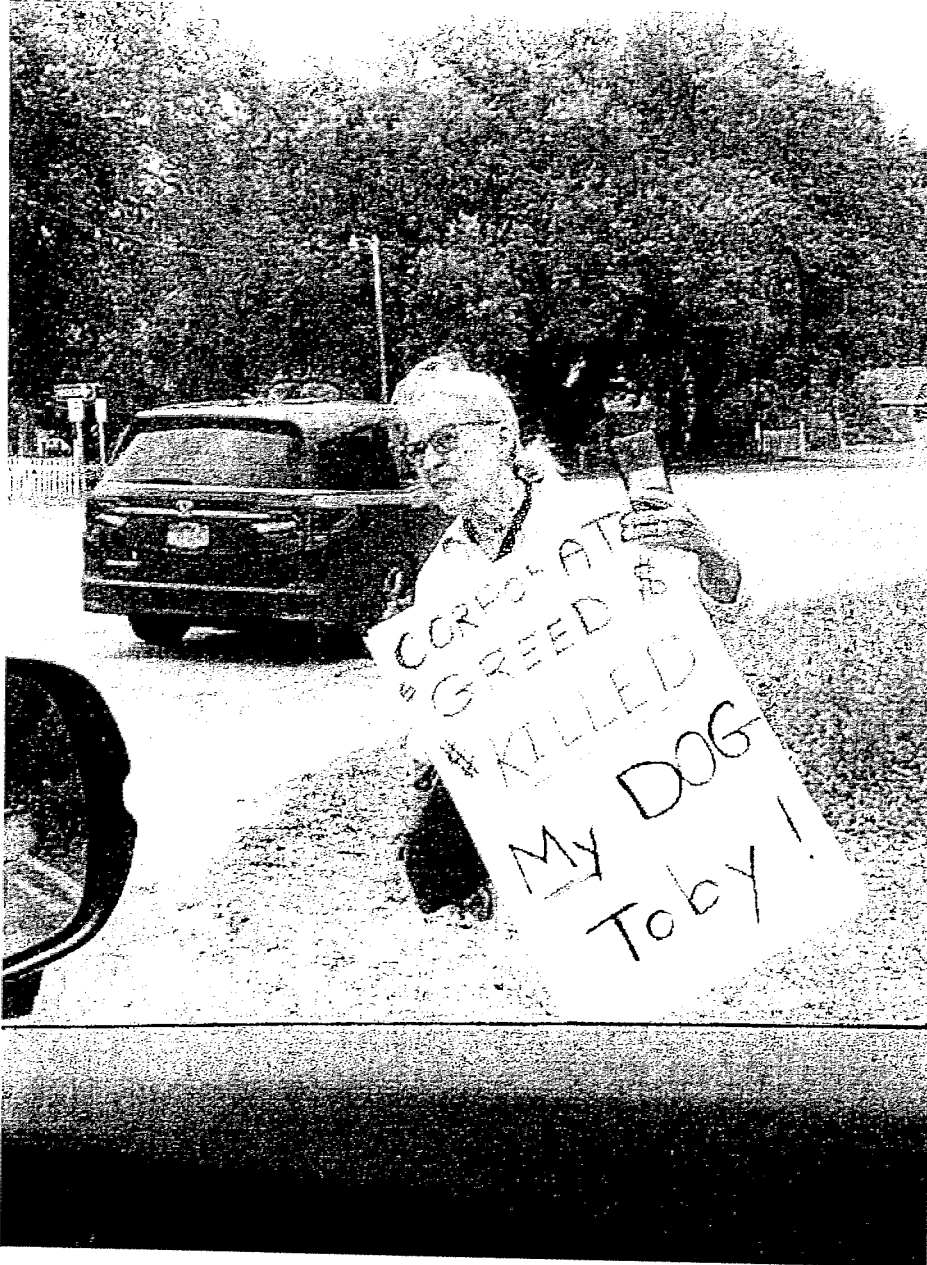


Exhibit B

Picture Pet Helper's Employee took

RECEIVED

Dec 14 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas, 9th Circuit Court
The Honorable Bentley D. Price

Court of Appeals Case No. 2022-000775

Circuit Court Case No. 2021-CP-10-2682

Pet Helpers, Inc..... Respondent

V.

Janet L. Frisco Appellant

V.

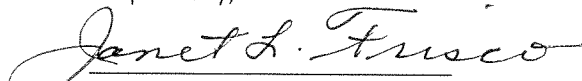
Melissa Susko.....Third-Party Defendant

PROOF OF SERVICE

I certify that I have served the Respondent **RETURN TO RESPONDENT'S MOTION TO STRIKE MATTERS FROM THE APPELLANT'S DESIGNATION OF MATTER** by delivering the same via email and United States mail, postage prepaid addressed to the Respondent as follows:

Stephan V. Futeral,
Attorney for the Respondent
1004 Anna Knapp Blvd., Suite 3
Mt. Pleasant, South Carolina 29464
sfuteral@charlestonlaw.net

Respectfully,


Janet L. Frisco, Pro Se

DATED: December 14, 2022