

AMENDED COMPLAINT: THIS SEPARATE SHEET WAS CREATED BY ME AND IS BEING ATTACHED IN LIEU OF THE OFFICIAL COMPLAINT FORM BECAUSE I EXPERIENCED FORMATTING AND USAGE ISSUES WITH YOUR FORM. THIS DOCUMENT IS INTENDED AS A REPORT FOR THE SUPREME COURT OF SOUTH CAROLINA OFFICE OF DISCIPLINARY COUNSEL.

I understand that my typed name serves as my signature.

1. My name and address: Mary Allison Griffith, P.O. BOX 50, East Freetown, MA 02717
2. My telephone number and e-mail: (678) 922-5840, [violetvirginmary@gmail.com](mailto:violetvirginmary@gmail.com)
3. Name of judge or attorney being complained against: Magistrate Francis X./ Mccann, County Attorney Katherine Dahlheim
4. Addresses of attorneys being complained against: 615 Riverland Drive, Charleston, South Carolina 29412; 4045 Bridge View Drive, Charleston, South Carolina 29405
5. Please provide the type of case, if applicable: Civil eviction with coinciding criminal assault action (same parties)
6. We did not employ these attorneys. As a matter of fact, we weren't even assigned to Francis Mccann as a judge in either/any of these actions. I believe Mccann intentionally commandeered cases off Magistrate Stephen Harris' assigned dockets like he'd done back in 2019. We also didn't employ County Attorney Katherine Dahlheim.
7. We did not employ these attorneys.
8. Specific (limited) information about misconduct:

Following a similar situation in 2019 wherein I don't believe legal process was followed, a self-professed member of the ISIS organization who made threats against my family filed a civil eviction action (case #2021CV1011300146) against my grown son in 2021. Like the 2019 civil action, the case had originally been assigned to Magistrate Harris (Exhibit 1), but ended up being disposed of by Magistrate Mccann. In my presence at court in 2021, Magistrate Mccann refused to review my son's evidence surrounding payment information and surrounding video-recorded ISIS terrorist threats by the Plaintiff, siding with the Plaintiff (Anthony "Tony" M. Chayban) and summarily evicting my son without the legally-prescribed 30-day notice in violation of SC Section 27-40-770.

When my son sought to appeal Mccann's illegal decision based on SC Section 27-40-770 (short-term stays are illegal in Charleston County/30-day minimum mandating a 30-day notice), on or about 6/16/2021, I believe Mccann retaliated by taking false reports from the Muslim extremist and other miscreants about my son and me, and, I believe, further retaliating by commandeering a pending 2021 criminal assault case wherein my son was the victim (case #2021A1010203060) from Judge Harris' docket also. Mccann also killed the separate restraining order that had been assigned to Judge Harris.

Mccann then proceeded to utilize the criminal assault case he'd, from my perspective, commandeered in a clear conflict-of-interest (my son couldn't afford the appeal bond because of what had been done to him/us, as this caused me also significant trouble and losses, but Mccann still had a financial liability) to defame, railroad, and DARVO (deny, attack, reverse victim and offender) my family — the victims who were supposed to be supported and protected over the course of the criminal action (case #2021A1010203060).

I believe Mccann knew he had a financial interest as of his, from my perspective, illegal commandeering of the assault action and killing of our formal restraining order against an ISIS terrorist because he had received a notice of my son's appeal in the civil eviction matter. He knew my son had a complaint about the prior civil disposition.

I believe Mccann involved Charleston County Attorney Katherine Dahlheim, who was listed as solicitor and never returned my telephone call about wanting to be notified of the pretrial hearings I was seeing on the docket, nor about the nature of the pretrial hearings I was seeing on the docket.

It incidentally appears to me that Mccann and Dahlheim had been involved in activity against others in the past (see Exhibits) that I believe appears to constitute similar conflicts-of-interest, as Dahlheim's position is specifically to defend officials like Mccann, who had significantly wronged us and/or others. Dahlheim's participation whatsoever (as a solicitor, prosecutor, or anything else) in the criminal assault action, I believe, represents an extreme conflict-of-interest in a scenario wherein the attorney's job description is to specifically defend officials like Francis Mccann.

There was no prosecutor listed when the criminal assault docket was viewable, but it came to my attention as the ISIS terrorist continued to terrorize me (I'm "family"), despite the criminal "no contact" order that the pretrial hearings were set up to defame us and allow false reports against us in the context of a criminal action wherein we were supposed to be protected — to sully the reputations of our persons and our Christian ministry, probably so that we couldn't complain about Mccann.

The self-professed ISIS terrorist contacted me to brag about and describe the defamation. The false statements that I believe were made against me in the illegal, inappropriate, and retaliatory context of the civil assault action wherein my family were the victims were text messaged directly to me by the ISIS terrorist who has broken the original “no contact,” which included and includes family, hundreds of times.

In addition, the docket listed a Charleston County Public Defender (Attorney Cassandra Woosley) as the defense attorney for criminal assault Defendant Tony Chayban, who is a multi-millionaire. To this end, I am interested in (please) reviewing the video recorded evidence that Chayban himself came all the way from California (his primary residence) in order to enter and exit the necessary building and apply for such an indigent defense himself — because I don’t believe that occurred.

I believe “someone” got him that public defender illegally. I would also like to (please) review the application upon which Chayban lied about his income and resources in order to secure such a defense, should such an application exist. The Public Defender’s office has evidently been clear with other criminal defendants who appealed Mccann’s decisions (one case specifically attached in these Exhibits) that criminal defendants MUST apply in-person for indigent defense. Therefore, I would like to please request the evidence that Chayban applied in-person, including video evidence of his presence at the prescribed offices in 2021 surrounding case #2021A1010203060.

I contacted Woosley online using the public defender contact form to let her know that Chayban wasn’t eligible for a public defender (he’s a multi-millionaire) and to generally brief her about the incidents leading up to these events because I assumed she probably hadn’t been told and/or may not have had knowledge of any indigent defense application process or lack thereof. I gave her the benefit of the doubt and cannot prove wrongdoing in order to report her one way or another. The application process, if it occurred, would have constituted fraud on the court in and of itself because of Chayban’s financial status. I believe any appointment of indigent defense also constitutes financial fraud.

However, Dahlheim has participated in similar ways (attached) with Mccann in the past and refused to return my call. A person I believe is a past victim of this kind of (conflict-of-interest) activity specifically detailed an in-person meeting (see Exhibits) with Dahlheim at the James Island Magistrate Court surrounding what I consider to be similar “sketchy” circumstances. So, unless someone else physically impersonated Dahlheim during that meeting, I believe it’s reasonable to assume her activities associated with these kinds of conflicts-of-interest have factually and intentionally arisen.

I believe Mccann knew or should have known that he was taking false statements against us in case #2021A1010203060, and that moreover, Mccann knew or should have known that it was inappropriate and illegal for him to hear the criminal assault action whatsoever once Mccann received notice that my son had attempted to appeal Mccann's illegal civil decision on or about 6/16/2021.

In addition, negative statements about victim, victims, and/or family whatsoever are not relevant or appropriate in the context of a prosecution of a criminal assault case which includes evidence of ISIS terrorist threats directly in the written statement by the victim — nor in the context of any criminal assault prosecution. I believe Mccann and Dahlheim knew or should have known this was illegal and inappropriate.

My son told me after an on or about June of 2021 hearing in the illegal civil eviction action (later disagreed with by Judge Beck, attached) that Judge Mccann specifically asked who helped my grown son (Tristen Nesbitt) type the original case #2021CV1011300146's appeal complaint based on Section 27-40-770. My son stated to me that he'd told Francis Mccann that it had been me who helped him get the paperwork together and typed/printed.

I knew about the notice periods because I'd seen eviction actions thrown out/dismissed over them by conscientious clerks and separately, a judge over just one day outside the notice period in another state, intuitively suggesting my son check South Carolina for similar laws in 2021. Therefore, I believe Mccann's efforts against me thereafter directly coincided with retaliation for the 2021 civil eviction appeal attempt.

When Tony Chayban sued my son in City Small Claims court over the illegal civil verdict, my son prevailed (case #2021CV1010600628, Judge Beck). I don't believe we should have ever been bothered again after that. I was forced to assemble evidence for that case because my son had been terrorized by ISIS for months and displaced with major health problems following terrorist attacks. It was a burden to me following financial losses from months of unmitigated terrorism within the hairball in 2021.

To add insult to injury, it came to my attention that Mccann specifically admitted to knowing Tony Chayban's AirBnb had been illegal all along, as well as obviously (to me) knowing about the 30-day notice mandate of Section 27-40-770, seemingly as of 2015 (attached).

Mccann has since been hearing other cases, I believe, in cahoots with malevolent participants associated with the ISIS terrorist at 324 Howle Avenue, and, I believe, illegally evicting at least one more appellant based on only a 10-day notice in direct violation of Section 27-40-770 while also refusing to review that Appellant's evidence. This was after Mccann was directly informed by my son in 2021, in writing, that the 30-day notice was legally required under section 27-40-770, whether or not my grown son could afford to proceed with the civil appeal. He couldn't even focus on the indigency forms because we weren't properly protected from daily and nightly terrorism in efforts to cause the illegal eviction.

Mccann received the complaint which stated the appeal grounds on or about 6/16/2021, so I believe he knew the law when he continued wronging others in the same manner. I believe he knew it was against the law.

I believe Mccann's actions against us have been intentional, and that he has triangulated and organized miscreants and corrupt individuals against us to the extent of ruining our lives.

We are incidentally a family with prophetic participation and prophetic confirmation at Morningstar Ministries in Fort Mill who sought to create a Christian community outreach, which Mccann was told by me about in court in 2021, in the Charleston area. Mccann then intentionally went against us and took false reports against us after I told him about the ministry I was trying to create.

We have been abused terribly by these individuals based on false statements that I believe Mccann intentionally allowed and/or had made. My son has been repeatedly assaulted and held political prisoner for 60 days at one point in efforts by Mccann to make my son look guilty of things my son didn't do, now requiring appeal, all because my son even *seemed* like he was formally challenging Mccann's civil decision.

I've never been a party in Mccann's South Carolina court. Mccann has never heard any case wherein I was a formal party, yet I've been dragged into this because he discovered that I helped and supported my grown son in seeking justice against an ISIS terrorist in 2021. The problems Mccann has caused for my son have directly affected my own health, safety, stability, and life functioning.

I recently attempted to bring the criminal assault action back to Judge Harris in efforting to report violations of the criminal assault no contact order by Chayban against my grown son and me, but despite the fact that I specifically called on a day when Judge Mccann does not work at Riverland Drive, the clerk informed me that the criminal assault docket was neither listed as disposed nor listed as being on-site at James Island Magistrate Court, indicating to me the high probability of either records tampering or a take-home scenario by a guilty Mccann surrounding the criminal assault docket (we are the victims).

One extremely disturbing scenario that I've noticed over the course of my many years of James Island Magistrate Court docket monitoring is Mccann's seeming pattern of removing his name from cases wherein he was seemingly the only judicial participant and/or leaving the judge's name blank in cases that I believe were being set up for certain previously-determined illegal outcomes involving only Judge Mccann.

Because there are only 2 judges at James Island Magistrate Court, Mccann and/or his associates' leaving the judge name blank in cases wherein Mccann clearly was the sole (ducking, dodging, hiding, in my belief and opinion) judicial participant, but also leaving the dockets listed as being heard at James Island, I believe Mccann's deceptive activities open Judge Stephen Harris (the only other judge there) up to a lot of unnecessary liability and/or reasonable doubt to blame Judge Harris for illegal things he didn't do wrong.

I believe Mccann's activities constitute obstruction, deception, and fraud. I believe Mccann minimally knew he had a financial interest (or liability to limit) in the criminal action wherein my son is victim following my son's on or about 11/17/2021 City Small Claims victory surrounding identical subject matter, and that Mccann knew Chayban wasn't eligible for a public defender because he knew that Chayban owned at least 2 properties (he owns many more across the States and possibly beyond, but California and South Carolina properties were, I believe, evident over the course of the illegal eviction).

Judge Harris never did anything bad or illegal to us and always listens to both sides, which is why I think cases are being commandeered from him by malevolent participants before the proper legal outcomes are able to arise.

I believe Mccann and associates need to stop messing with cases and dockets. In fact, I believe Mccann needs to be removed from his judicial position immediately pending further investigation — and made to pay for my investigative efforts herein.

I also believe Dahlheim needs to be removed from her position. Regardless of the ringleader, I believe her behavior was intentional, and that she is intelligent enough to know better on the basis of passing the bar exam.

By these efforts, I believe Mccann is technically stealing from us and manipulating others to help, besides trying to destroy our reputations and remove our lives, liberties, resources, and/or freedoms. I believe Mccann knew I had a financial interest in the civil action and that my son and I had both been targeted by Chayban/ISIS because my statement should have caused him to know that. I know Mccann knew that because of what I told him in court in 2021.

My son was falsely accused and held political prisoner for 60 days because of this. He's been repeatedly brutally physically assaulted by these individuals desperately and continually trying to limit their liabilities to us, including but not limited to the same week he refused to move from 324 Howle Avenue without court process back in 2021.

My son was subjected to a false arrest which included an illegal and public body cavity search in the clear presence of a female officer and brutally assaulted at that time based on false statements that I believe were drummed up by our malevolent opposition in 2021 when they couldn't "scare my son out" in another way — because he literally couldn't afford to move from his home fast enough for these lawbreakers.

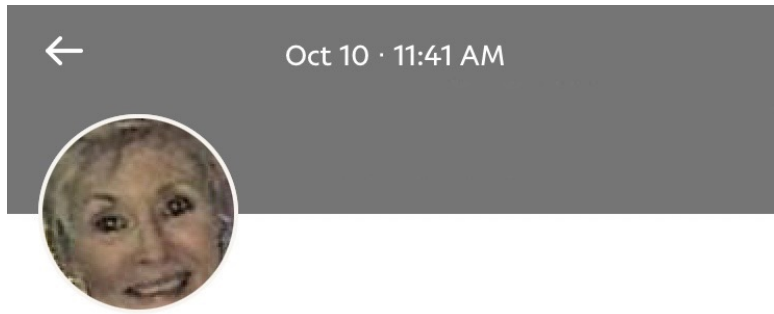
Because of the sparse background information I've found to be available about Judge Mccann (and not just because he's been bothered, oppressed, or terrorized and not had a chance to set up his public profiles, which is the case in my case), I am requesting more detailed information about Francis X. Mccann's professional background. I specifically want to know whether Mccann has ever held another government position besides SC Magistrate Court Judge and zoning commission positions in any jurisdiction(s).

We need your help, and from my perspective, so do the others this judge and his associates seem, to me, to be continually, illegally, and intentionally wronging. Thank you.

Sincerely,

Mary A. Griffith

APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



You received \$500 from  
Deborah Anthony

"Blessings galore on all you do and are!!"

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Transaction type

Money received

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You and Deborah Anthony

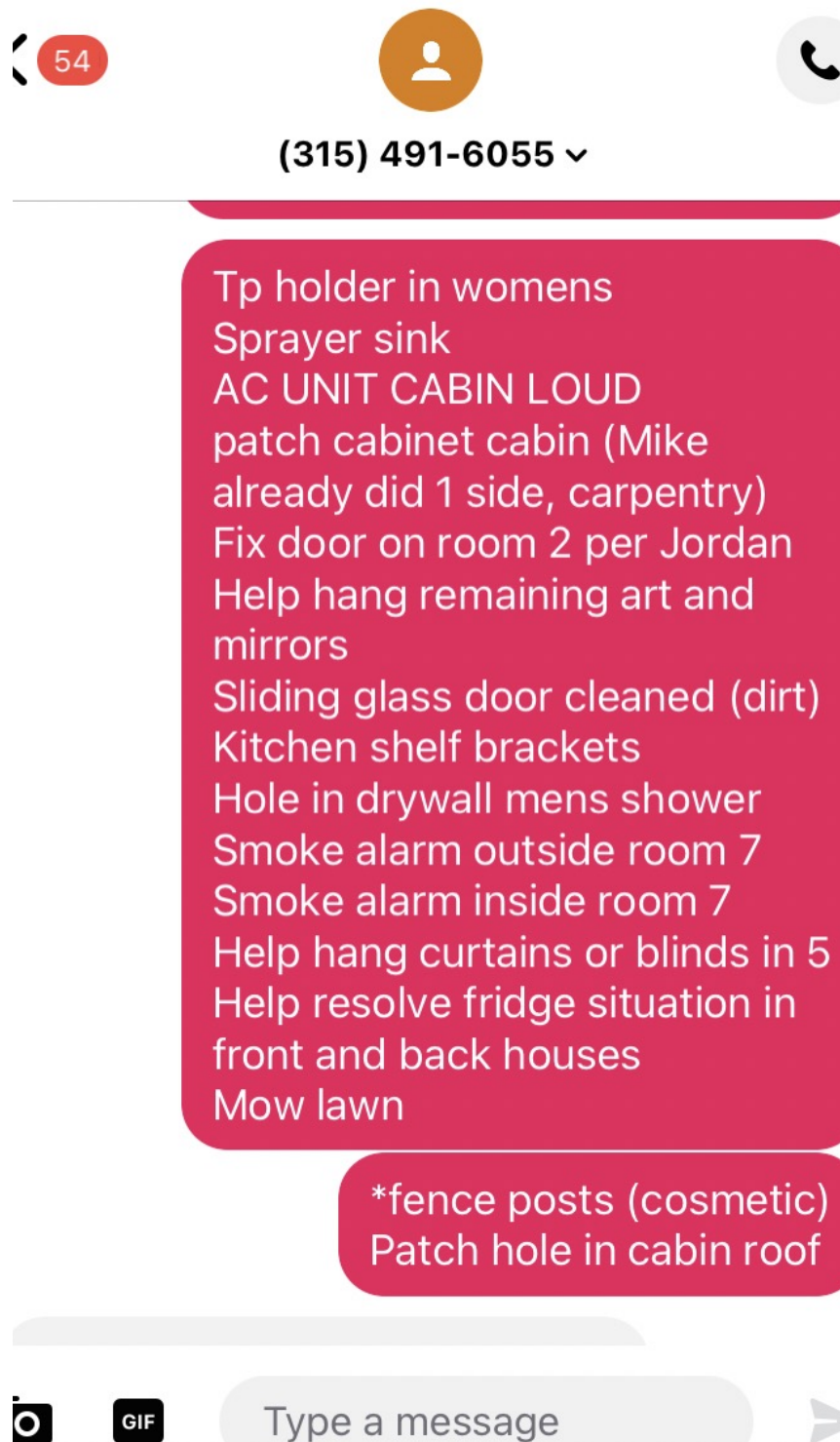
 Email

 Send money

My mother's 10/10/2020 donation to my non-profit upon new agreement between Chayban and me. Unfortunately, my mom's donation was spent on emergency housing because of terrorism by Chayban the following month. Though I want the court to see my mother's identity to verify what happened, I'm asking permission to redact this Exhibit in concealing my mother's identity prior to service upon a self-professed ISIS terrorist who has threatened terrorist attacks upon my whole family dozens of times, and also that the Court please redact it or allow me to do so before any sharing or publication. There are additional pieces of evidence documenting our new agreement. Thank you.

**EXHIBIT 1**

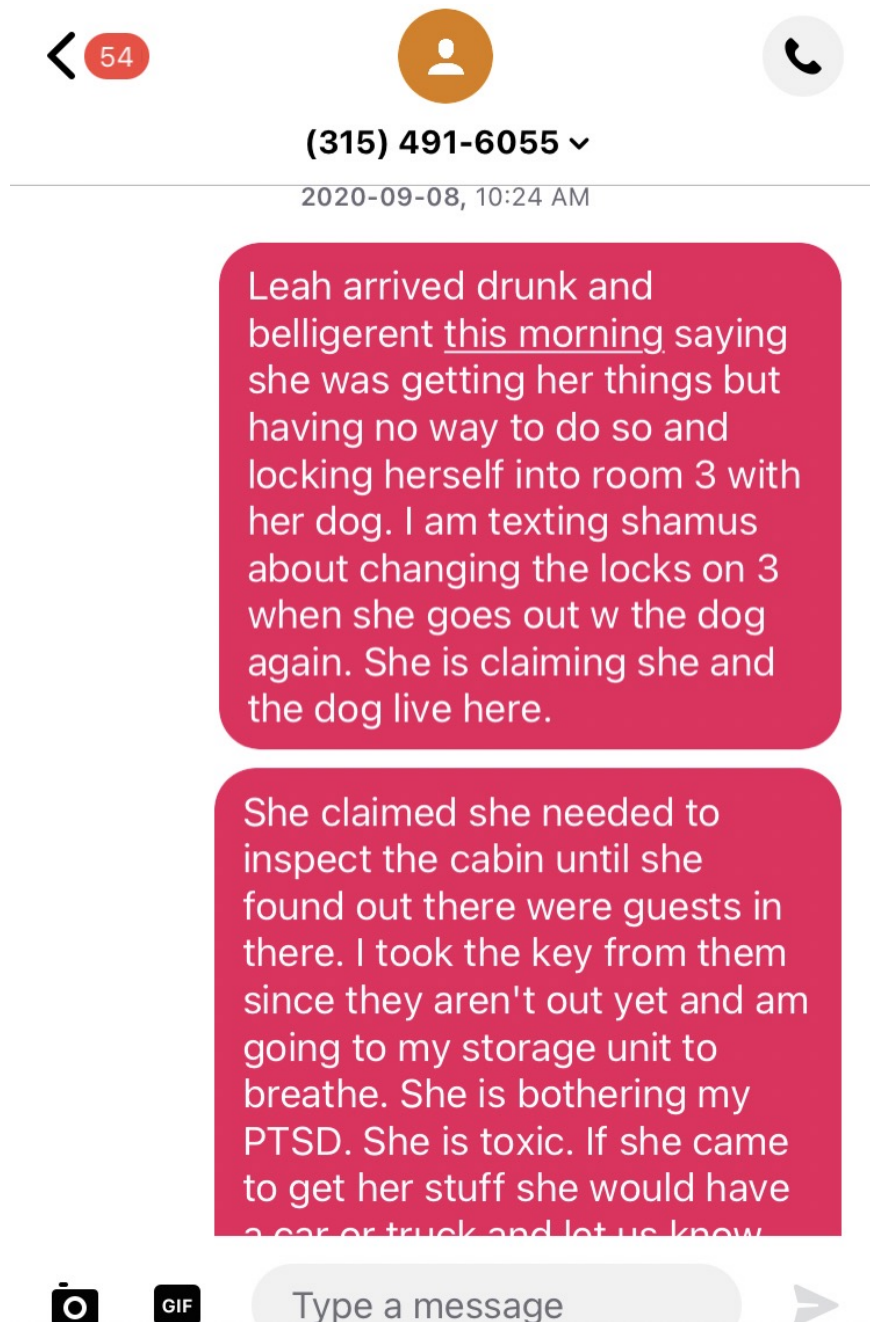
APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



Partial work list texted to Chayban by me during a short cycle compared to the totality of my work on 324 Howle Avenue

## EXHIBIT 2

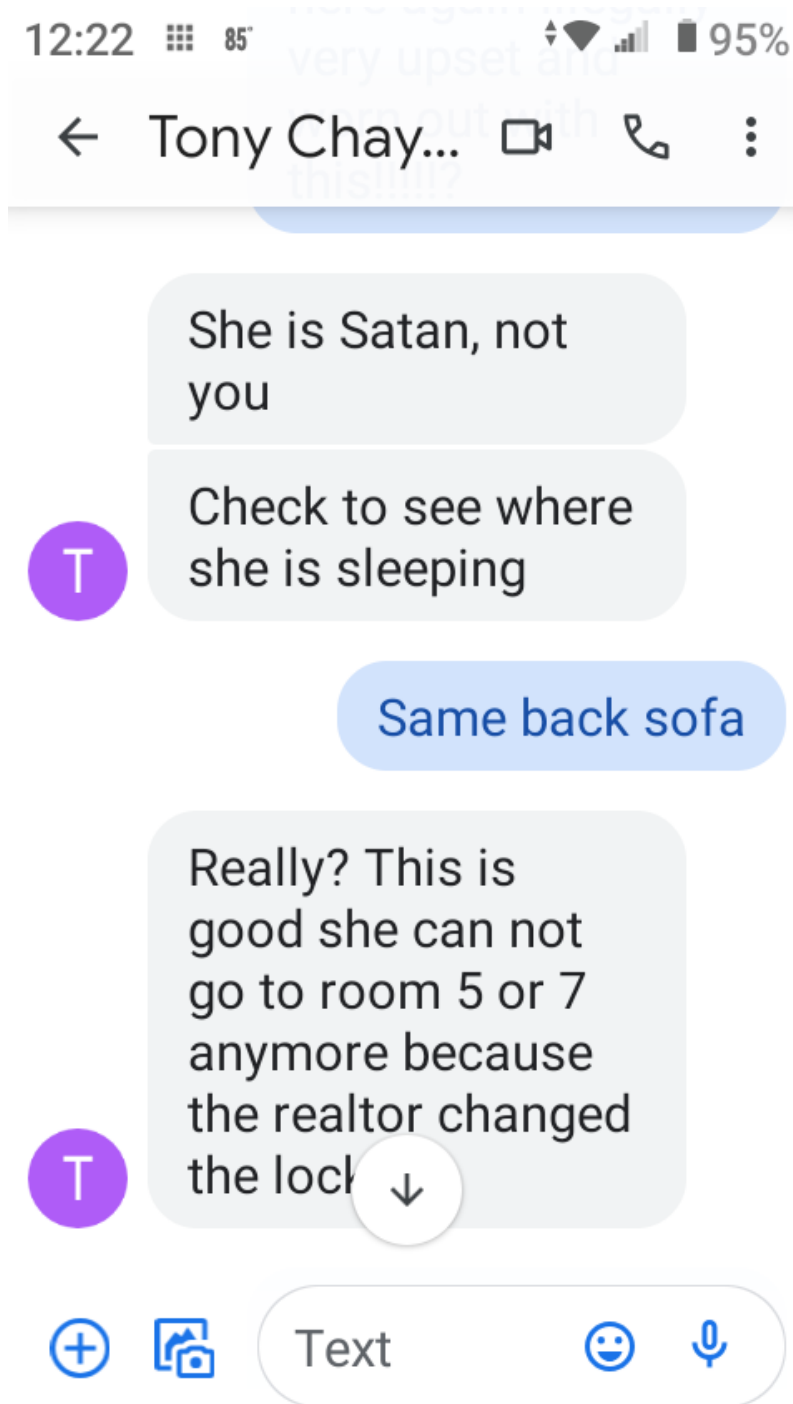
APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



One of (at least) dozens of pieces of evidence surrounding only my on or about 9/8/2020 private security detail wherein the woman above arrived intoxicated with a pit bull, perpetuating what I recall to have been a multi-day police standoff wherein the individual was eventually removed. Chayban admitted to me that he had a personal relationship with this person I'd never seen before, and his prior comment of which I have evidence indicates to me his permissiveness with regard to this individual's activities. He demanded I call police and handle it. I also had to clean up a huge mess that I have images of.

## EXHIBIT 3

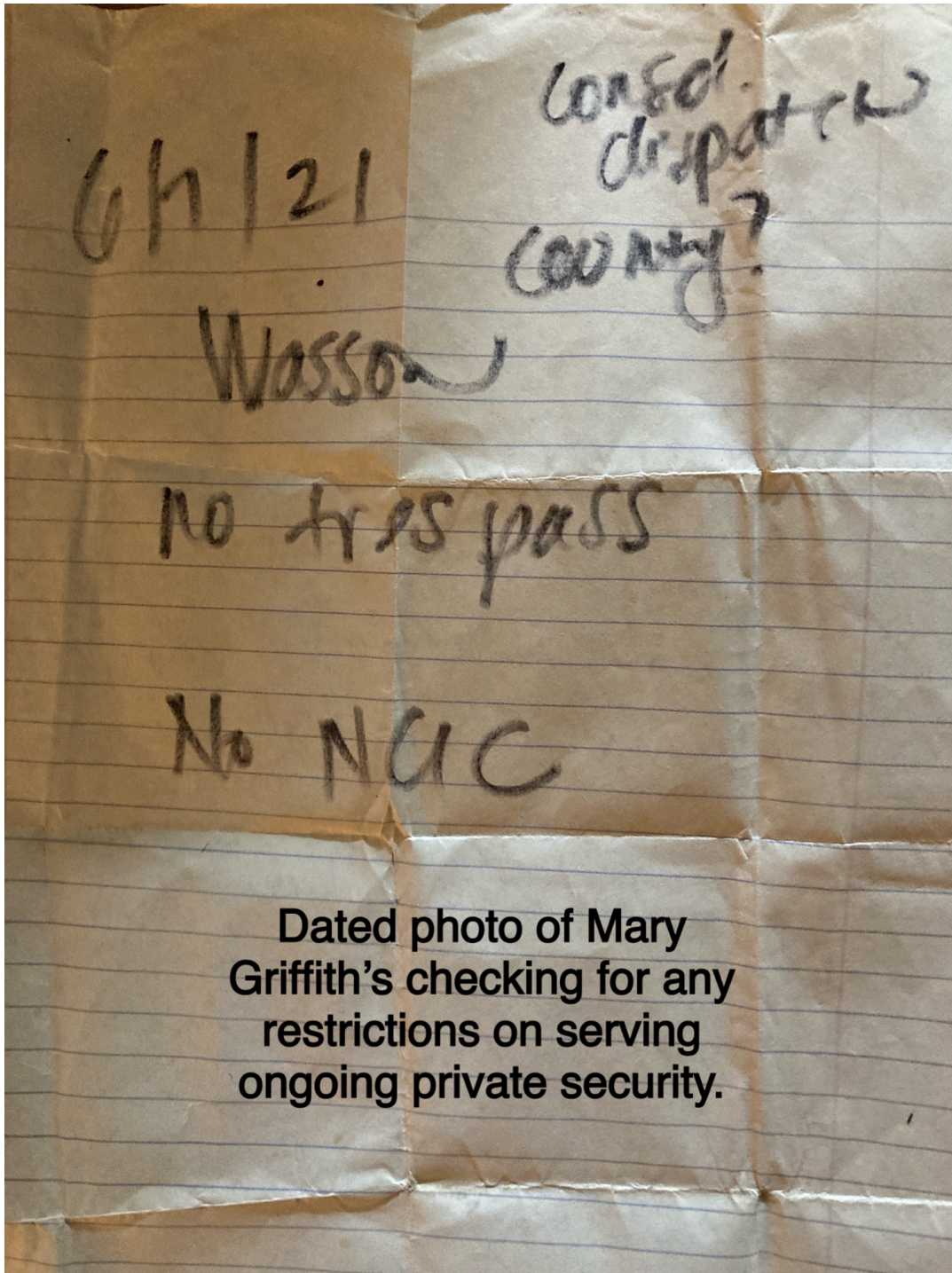
APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



One of several pieces of evidence of my on or about 6/18/2021 security detail surrounding Elizabeth Thomas' crack cocaine relapse and Chayban's remote and malevolent activities in stirring additional problems while on criminal "no contact" for assaulting my grown son, a then-tenant. I never went in or attempted to go into rooms 5 or 7 in 2021. As is indicated, I performed emergency security from the back sofa in a common area. In addition, I was never evicted by Chayban in 2020 when it became evident he greedily refused to stop illegal short-term stays or wait for basic and necessary repairs to complete because he terrorized me and got me to flee so he wouldn't have to face me in court.

## EXHIBIT 4

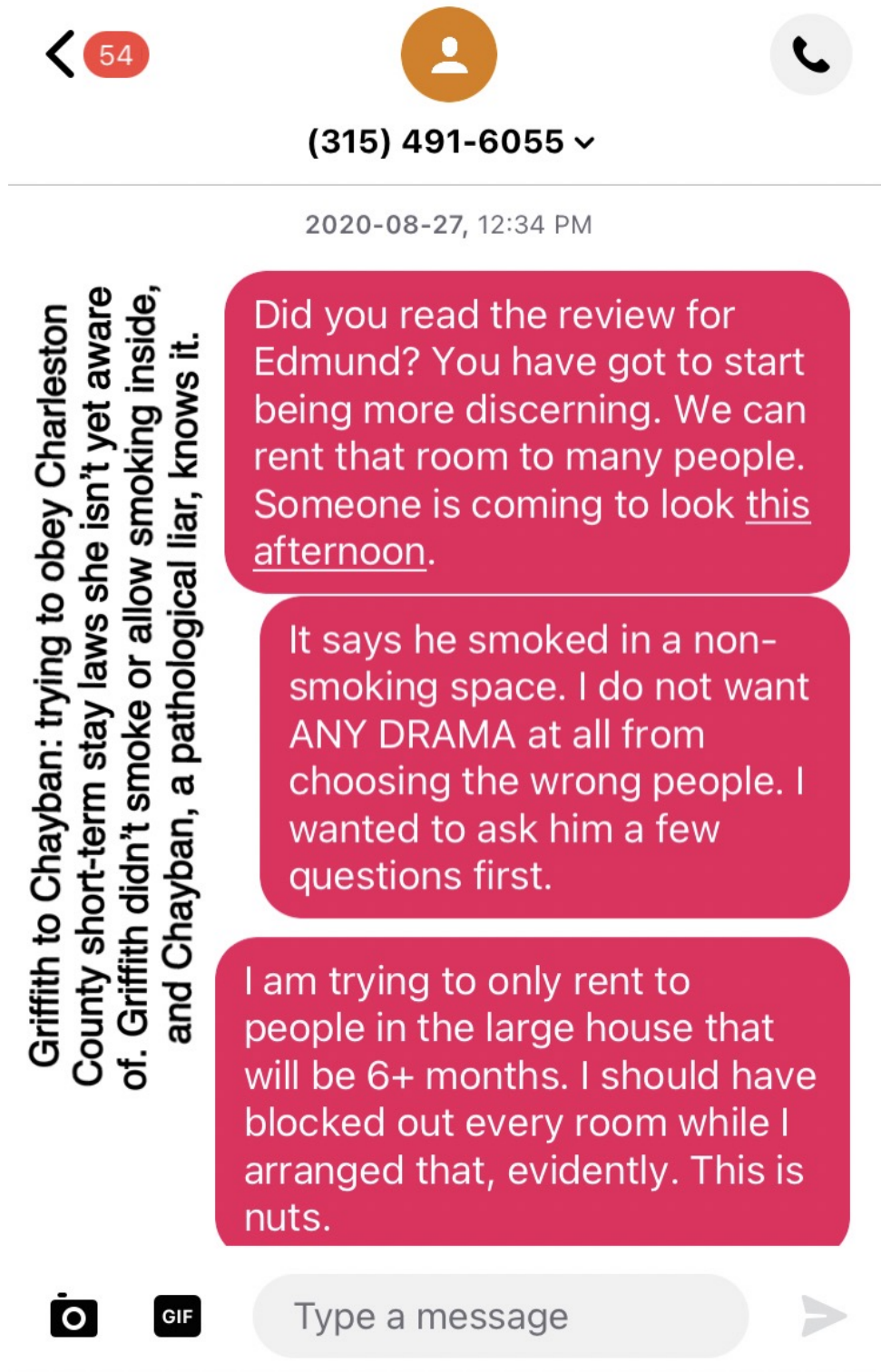
APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



Dated photo of Mary Griffith's checking for any restrictions on serving ongoing private security.

**EXHIBIT 5**

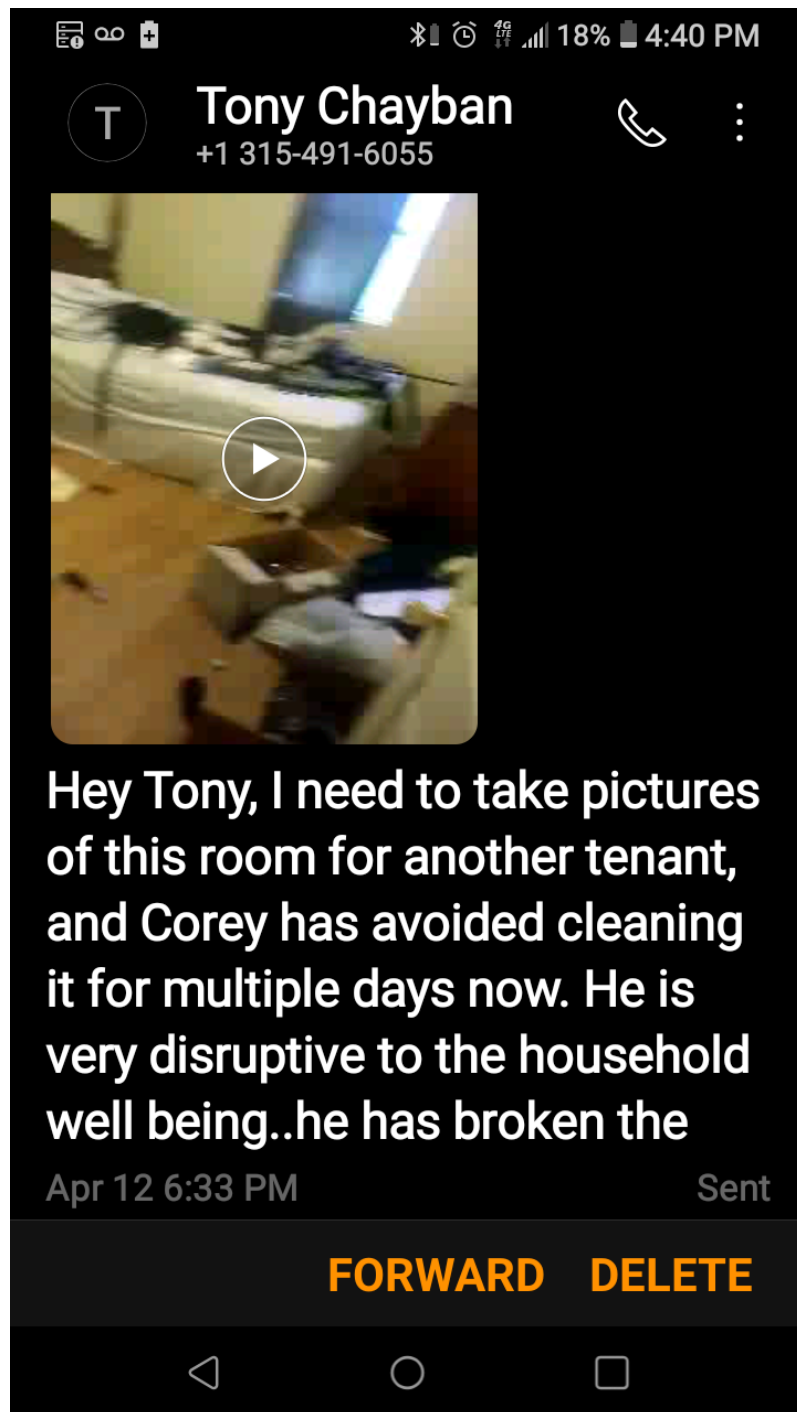
APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



I believe Chayban knew short-term stays were illegal in Charleston County the entire time because of a Water's Edge HOA case against him wherein he also lied.

## EXHIBIT 6

APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



A 2021 video (available, will be used) my son sent to Chayban in 2021 which demonstrates the condition of Room 5, which is pictured in the following Exhibit in the condition I left it in 2020. My son is complaining to Chayban about being terrorized by a violent miscreant Chayban contracted to terrorize my grown son in 2021.

## EXHIBIT 7

APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



Condition in which Room 5 was left by me in 2020 before the last tenant came and I was shortly thereafter terrorized into fleeing my home without legal process. I didn't see it after that. This is one of (at least) dozens of images of the immaculate condition of 324 Howle Avenue compared to before and after my participation at the premises. "After" image in prior Exhibit.

**EXHIBIT 8**

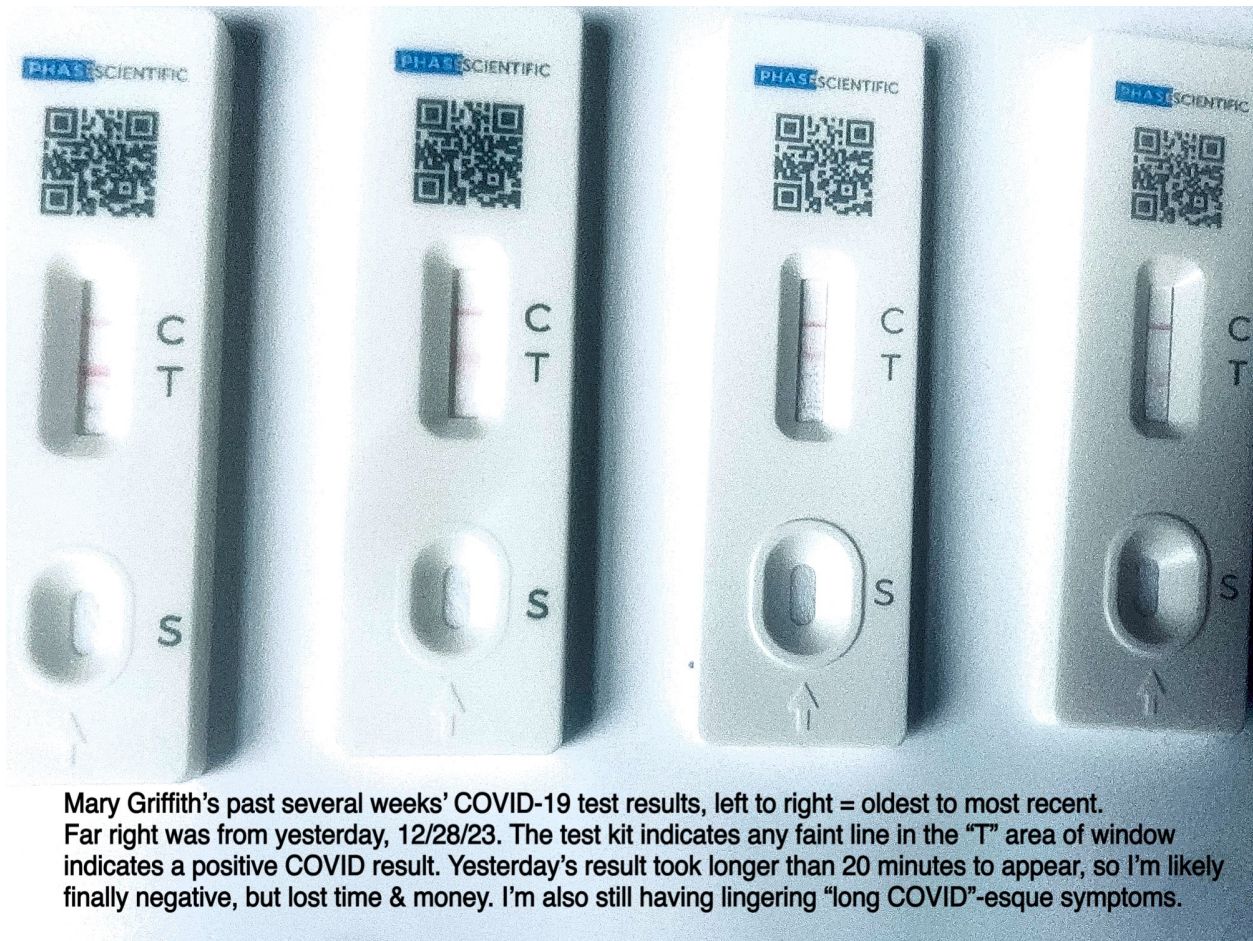
APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



2020 text message screenshot from a conversation wherein I informed Chayban about not being able to accept a third-shift tenant because I cleaned and did laundry during the day directly by the person's room, and he stated he was a light sleeper. Chayban lied about my being up all hours at 324 Howle Avenue making any noise or doing anything other than serving emergency 2021 private security because of late-night incidents. I've had to stay up late since that time to assemble evidence and conduct investigations, but that never happened while I was active at 324 Howle Avenue. This case is riddled with false statements about my family and me by Chayban. There are hundreds of pieces of evidence of that fact.

## EXHIBIT 9

APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN

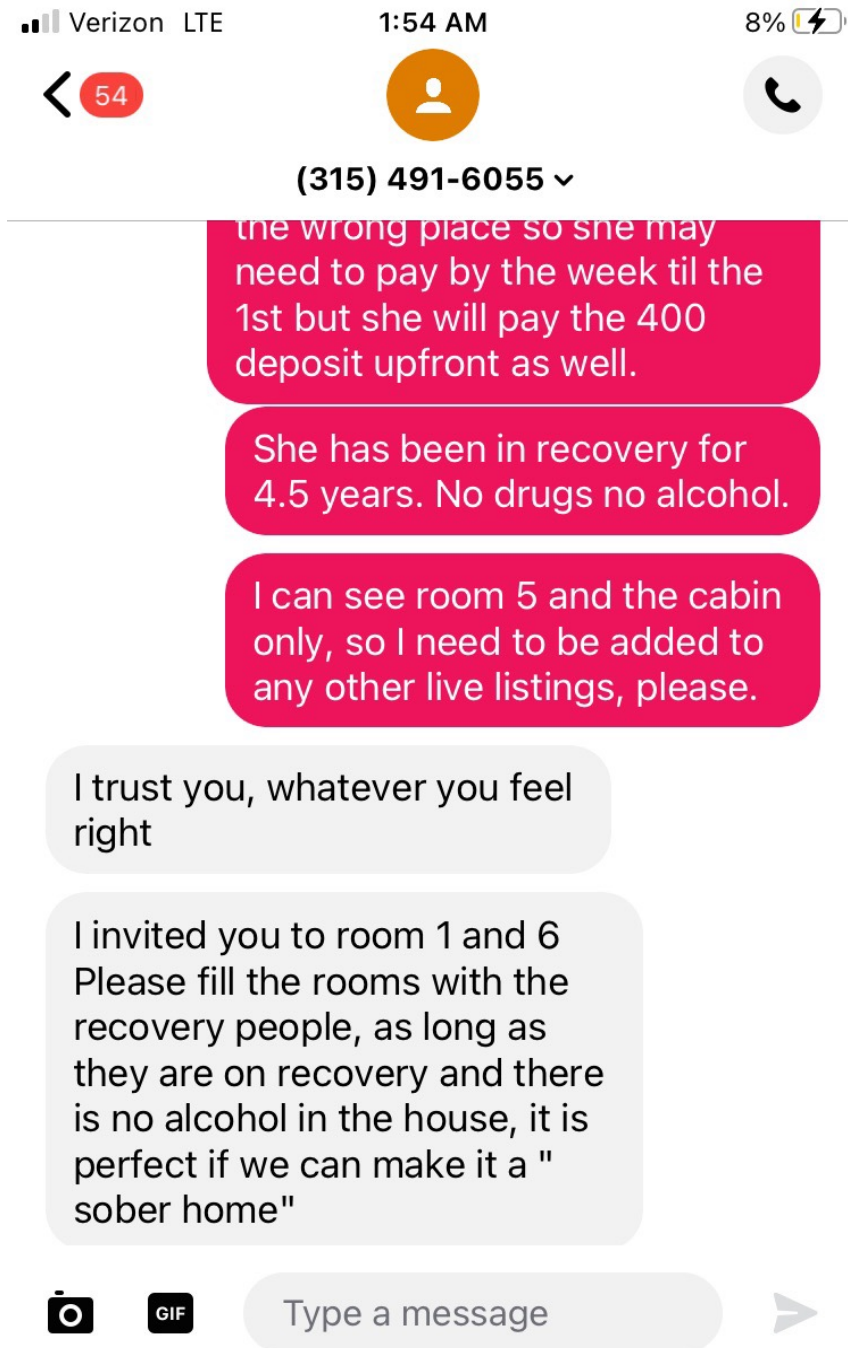


Mary Griffith's past several weeks' COVID-19 test results, left to right = oldest to most recent. Far right was from yesterday, 12/28/23. The test kit indicates any faint line in the "T" area of window indicates a positive COVID result. Yesterday's result took longer than 20 minutes to appear, so I'm likely finally negative, but lost time & money. I'm also still having lingering "long COVID"-esque symptoms.

This is an image of my COVID-19 tests as of 12/29/2023. Any result in the "T" area indicates a positive result (as long as it appears within 20 minutes. There is a line in the "T" area of the window in the second image from left, but it's not as visible at this resolution. Please do not dismiss my claims based on that. I can provide a better version of the test images if needed, as I took several pictures.

**EXHIBIT 10**

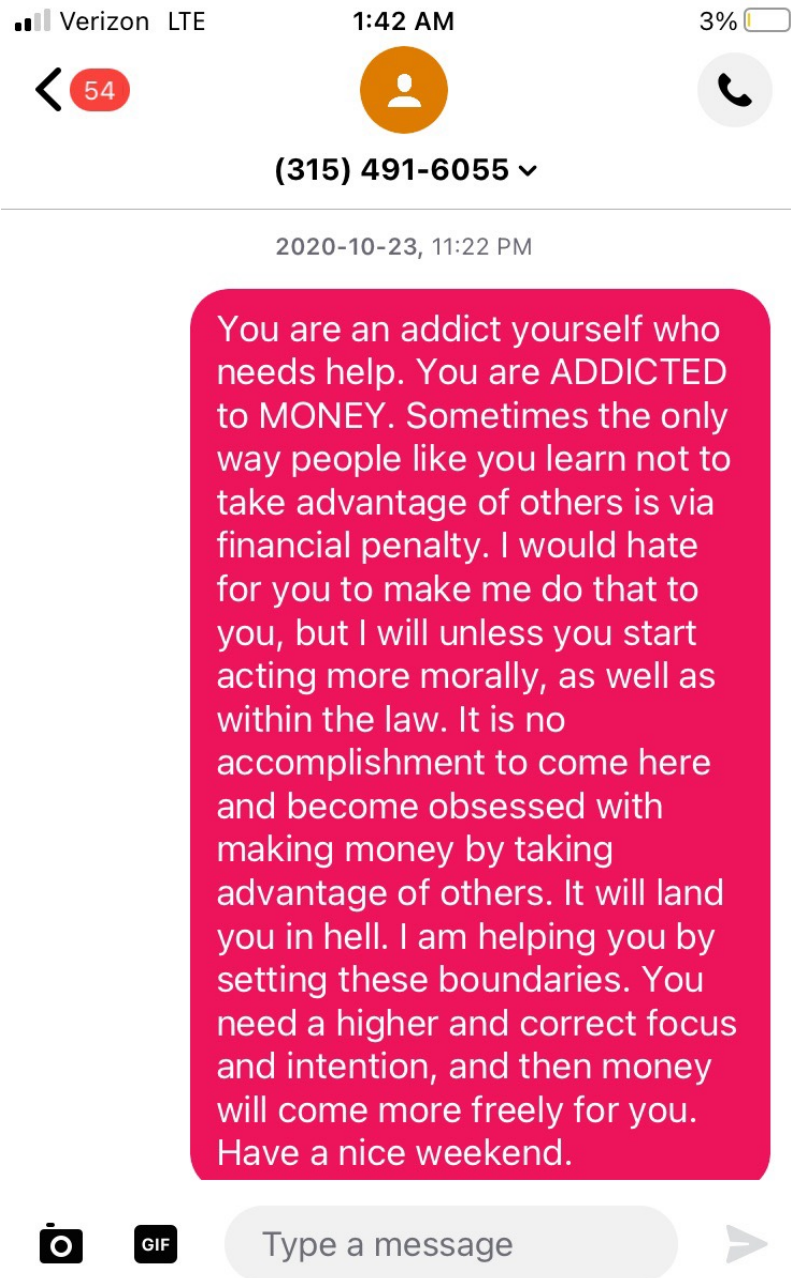
APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



October 2020 text message screenshot of one of several conversations with Chayban wherein we discussed the conversion to the ministry I intended to build, but with which Chayban refused to comply because he literally does not care about our communities. The conversation here surrounded a long-term tenant who was short on funds upfront and needed to make payments — not a short-term rental. The time stamp is from when the screenshot was taken after the fact, and not the date and time of the actual conversation.

## EXHIBIT 11

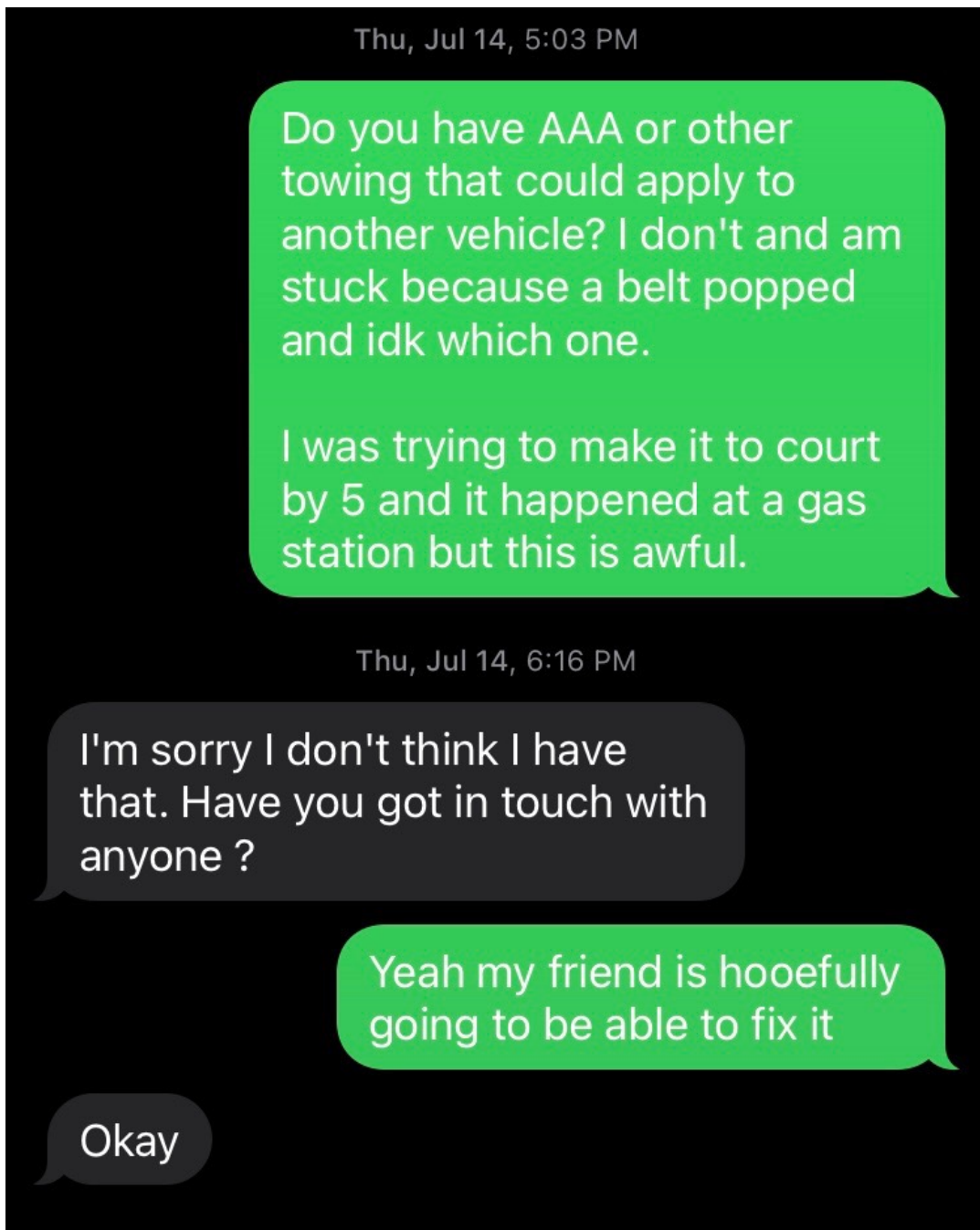
APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



A text message I sent Chayban in October of 2020

**EXHIBIT 12**

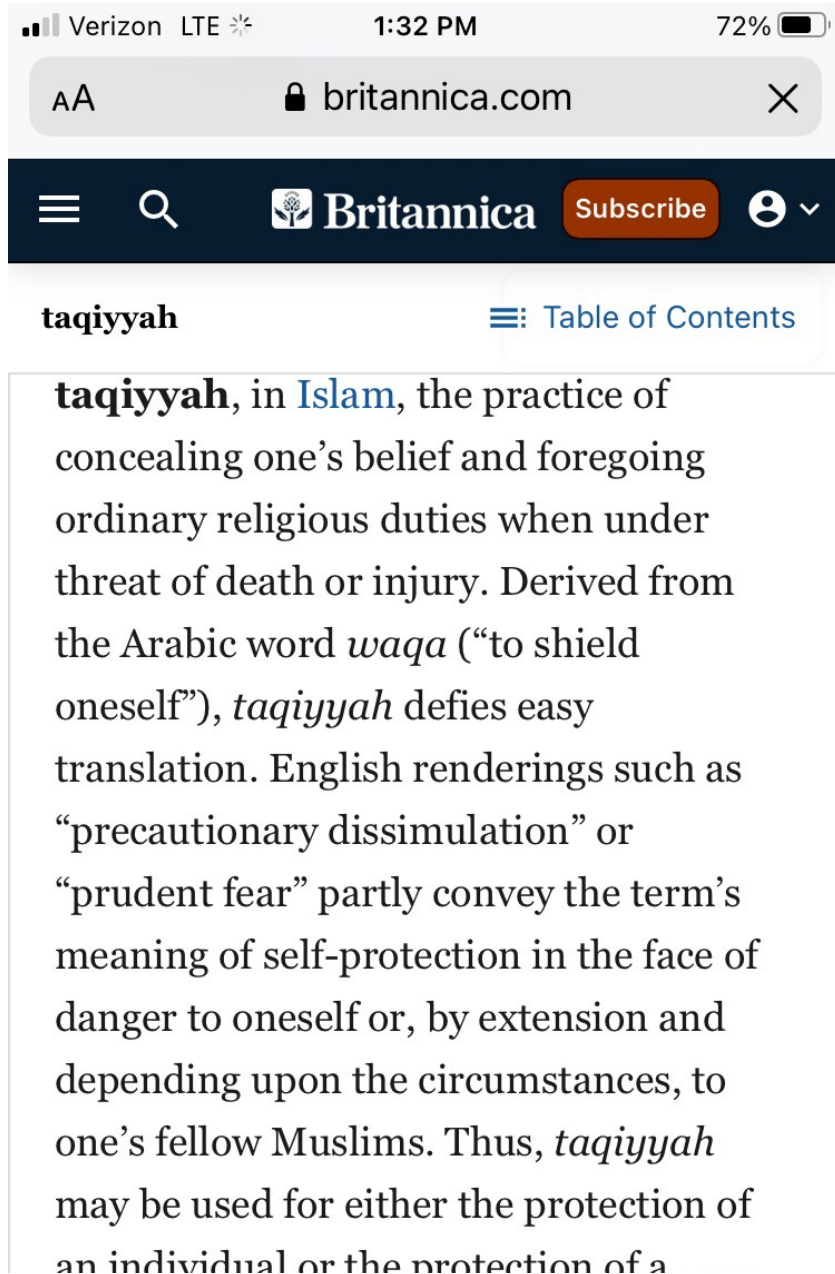
APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



One of several pieces of evidence for a lower court extension I didn't even get to plead because of terror attacks and other woes in Charleston

**EXHIBIT 13**

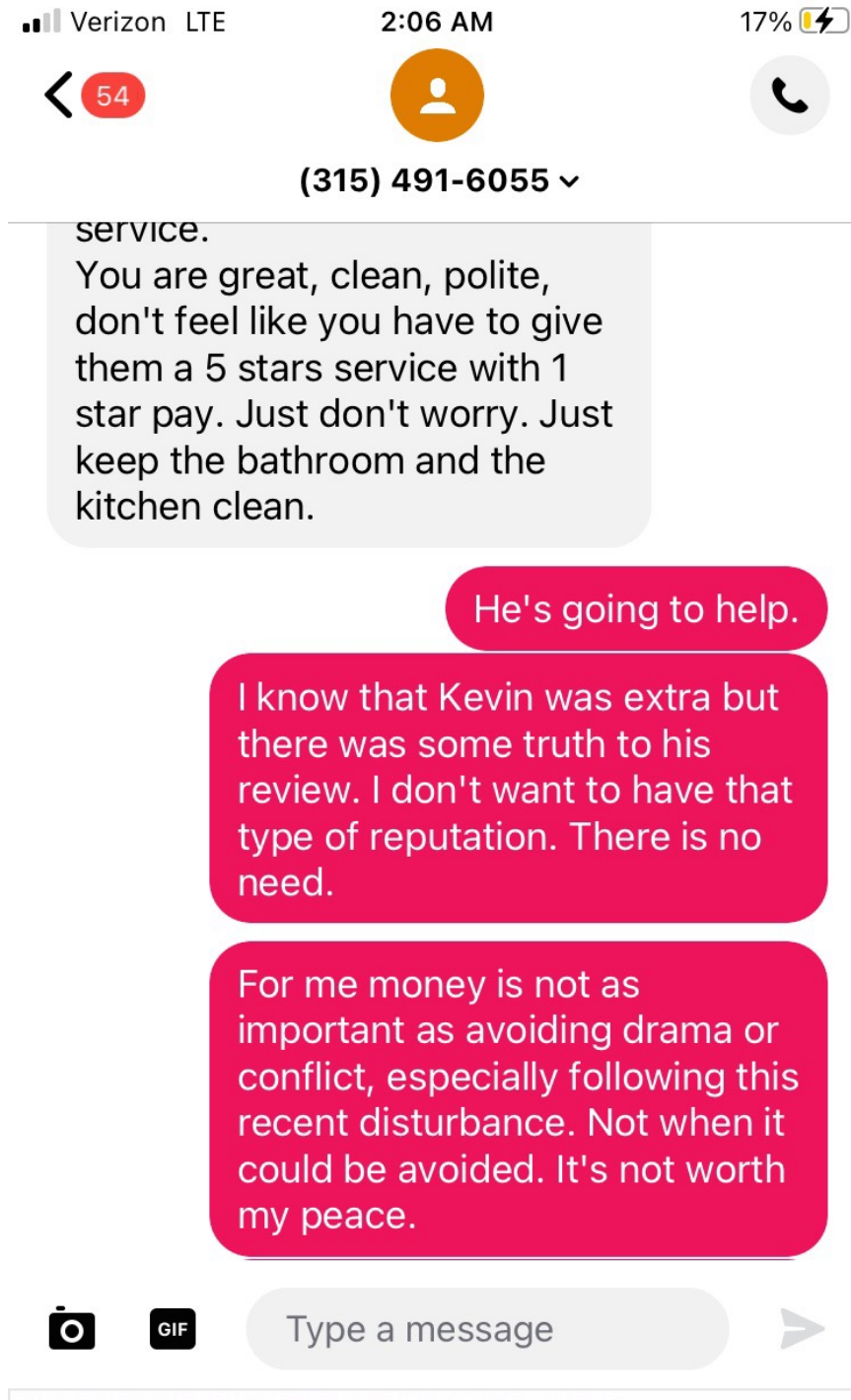
APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



I believe Chayban deceiving me/others and pretending to be a Christian the entire time for personal gain and in alignment with this concept while claiming ISIS ties and making terrorist threats/launching attacks. Dissemination of disinformation (spreading lies about opponents) is also a documented ISIS duty of war.

**EXHIBIT 14**

APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



One of multiple available 2020 text message transcripts of Chayban complaining about how clean I was at 324 Howle Avenue (he believed it made him lose money, accusing me of taking 4 hours to clean one room and stating in a documented way that we didn't need to worry about COVID at the height of the epidemic).

## EXHIBIT 15

## People also ask



How does betrayal trauma affect the body? 

The signs and symptoms of Betrayal Trauma vary, but generally include symptoms of post-traumatic stress disorder (PTSD), such as: **Intrusive thoughts and images. Nightmares or flashbacks. Avoidance behaviors.** Oct 12, 2021

 <https://mindwellnyc.com> › top-betra...

[Top Betrayal Trauma Signs, Triggers & Strategies to Recovery \[2022\]](#)

### More results

How does betrayal trauma change the brain? 

As if that is not enough, when betrayal occurs, your brain begins to operate in a different way. **The fear center fires up and stays fired up, creating hyper-vigilance, restlessness, anxiety, and a sense of being perpetually on guard.**

 <https://www.relationalrecovery.com> › ...

[Complex Betrayal Trauma & Emotional](#)

Limited information about betrayal trauma based on events I can prove via a litany of evidence

# EXHIBIT 16

APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



One type (spider infestation) of multiple pest problems I experienced at 301 West Hudson on Folly Beach following Chayban's 2020 illegal, out-of-court eviction using terrorist attacks (threatening to lie or disseminate disinformation about me if I took him to court — and more)

**EXHIBIT 17**

APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



2022 301 West Hudson windowsill with a similar problem to those issues I experienced at 324 Howle Avenue. I had believed these were from termites because this is what the termite droppings looked like at 324 Howle Avenue, but I'm not sure.

**EXHIBIT 18**

APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



I'm not sure what type of bugs these were infesting the beds at 301 West Hudson, but it was a serious issue in 2 of the rooms I cleaned and/or tried to live in.

**EXHIBIT 19**

APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN





Debris I cleaned from an upstairs bedroom at 301 West Hudson during my move-in. I was illegally evicted without being paid. This was one of my many Charleston housing woes following Chayban's participation against my family to the point where I had to leave the area.

**EXHIBIT 20**

APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN

2023 JAN 7

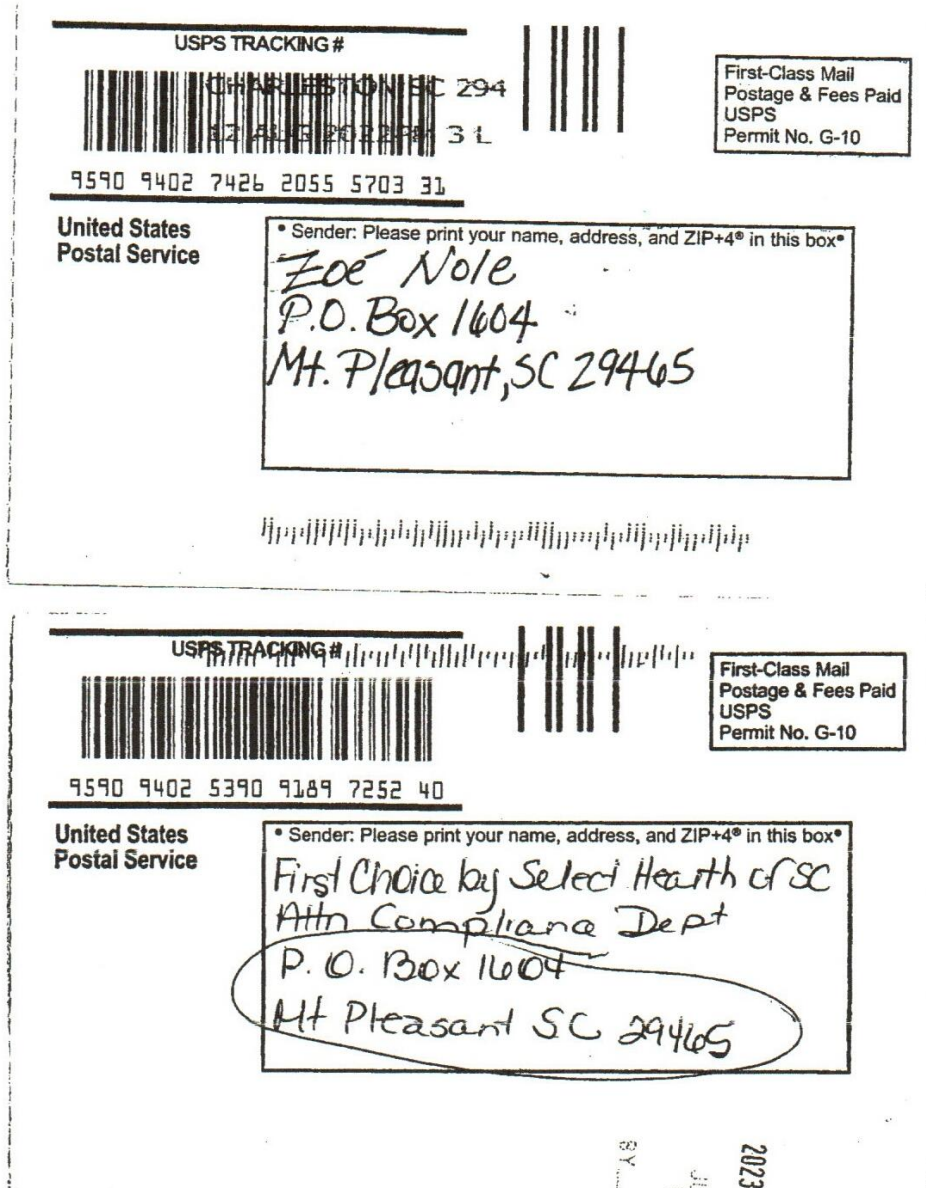
SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Taylor O'Neil</i> C. Date of Delivery <i>8-12-22</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p style="text-align: center;"><b>AUG 12 2022</b></p>
<p>1. Article Addressed to:</p> <p><i>1st Choice by Select Health of SC</i> <i>P.O. Box 40849</i> <i>Charleston, SC 29423</i></p>  <p>9590 9402 7426 2055 5703 31</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Registered Mail</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>
<p>2. Article Number (Transfer from service label)</p> <p><i>7019 1120 0001 4874 8540</i></p>	
PS Form 3811, July 2020 PSN 7530-02-000-9053	Domestic Return Receipt

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Zoe S. Nole</i> C. Date of Delivery <i>30 Aug 22</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p><i>Zoe (Jennifer) Nole</i> <i>P.O. Box 1604</i> <i>Mt Pleasant SC 29465</i></p>  <p>9590 9402 5390 9189 7252 40</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input checked="" type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>
<p>2. Article Number (Transfer from service label)</p> <p><i>7021 2720 0001 9560 7049</i></p>	
PS Form 3811, July 2015 PSN 7530-02-000-9053	Domestic Return Receipt

I never knew or knew of any of the parties or entities listed here on the proofs used to dismiss my lower court action on 324 Howle Avenue until I saw them filed as alleged proofs in the action.

**EXHIBIT 21**

APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN



Additional alleged proofs featuring parties/entities I had never known of which were utilized in documenting the dismissal of the lower court action against Chayban for my work/claims on 324 Howle Avenue

**EXHIBIT 22**

APPEAL OF DISMISSAL FROM NINTH CIRCUIT (CHARLESTON COUNTY)  
COMMON PLEAS IN CASE #2022-CP-100-3246, GRIFFITH V. CHAYBAN

Case No. 2022-CP-10-3405  
Note vs 1st Choice

January 29, 2023

2023 JAN 30 PM 12:03

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  <input checked="" type="checkbox"/> <i>Zoe S. Note</i> <input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Zoe S. Note</i> C. Date of Delivery <i>30 Aug 22</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes                      If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:  <i>Zoe (Jennifer) Note                      P.O. Box 1604                      Mt Pleasant SC 29465</i></p>	<p>3. Service Type  <input checked="" type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®  <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™  <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery  <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™  <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery  <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>
<p>2. Article Number (Transfer from service label)  <i>7021 2720 0001 9560 7049</i></p>	
<p>9590 9402 5390 9189 7252 40</p>	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>	<p>Domestic Return Receipt</p>

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  <input checked="" type="checkbox"/> <i>Taylor O'Neal</i> <input checked="" type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Taylor O'Neal</i> C. Date of Delivery <i>8-12-22</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes                      If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:  <i>1st Choice by Select Health of SC                      P.O. Box 40849                      Charleston, SC 29423</i></p>	<p>3. Service Type  <input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®  <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™  <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery  <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™  <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery  <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>
<p>2. Article Number (Transfer from service label)  <i>7019 1120 0001 4874 8540</i></p>	
<p>9590 9402 7426 2055 5703 31</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>	<p>Domestic Return Receipt</p>

*Zoe S. Note  
1/29/2023*

Additional alleged proofs used to dismiss my lower court 324 Howle Avenue claims featuring parties/entities I had never known or known of

EXHIBIT 23


AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM

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Home Page	Search Tips		

Arthur Ravenel Jr Company VS John Anthony , defendant, et al					
Case Number:	2019CV1011300168	Court Agency:	James Island Magistrate	Filed Date:	03/12/2019
Case Type:	Civil	Case Sub Type:	Rule to Vacate \$40	File Type:	
Status:	Settled	Assigned Judge:		Disposition Judge:	Harris, William Stephen Jr
Disposition:	Settled	Disposition Date:	03/29/2019	Disposition Judge:	Harris, William Stephen Jr
Original Source Doc:		Original Case #:			
Judgment Number:	2019CV1011300168	Court Roster:			

Case Parties							
Click the  icon to show associated parties.							
Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
Anthony, John	405 Cheves Drive #A Charleston SC 29412				Defendant		03/29/2019
Arthur Ravenel Jr Company	105 Wappoo Creek Dr Suite 4A Charleston SC 29412				Plaintiff		03/29/2019
Nesbitt, Tristen	405 Cheves Drive #A Charleston SC 29412				Defendant		03/29/2019

Judgments							
For:	Arthur Ravenel Jr Company	Against:	Anthony, John	Judg. Amount:	\$0.00	Judgment Date:	03/29/2019
Description:		Disposition:		Disp. Date:		Date Entered/Last Changed:	03/29/2019 --
Notes:	None						
Judgment Details							
Claims Code	Detail Desc.	Detail Amount	Detail Date				
None							
For:	Arthur Ravenel Jr Company	Against:	Nesbitt, Tristen	Judg. Amount:	\$0.00	Judgment Date:	03/29/2019
Description:		Disposition:		Disp. Date:		Date Entered/Last Changed:	03/29/2019 --
Notes:	None						
Judgment Details							
Claims Code	Detail Desc.	Detail Amount	Detail Date				
None							

Actions						
Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Arthur Ravenel Jr Company	Certificate of Mailing for Service RTV	Filing		03/19/2019-14:46	03/29/2019-14:46	
Arthur Ravenel Jr Company	Service/Posted Non Service RTV	Filing		03/19/2019-00:00	03/29/2019-00:00	
Arthur Ravenel Jr Company	Service/Proof Of	Filing		03/19/2019-00:00	03/29/2019-00:00	
Arthur Ravenel Jr Company	Service/Posted Non Service RTV	Filing		03/18/2019-00:00	03/29/2019-00:00	
Arthur Ravenel Jr Company	RTV Documents	Filing		03/12/2019-15:50	03/29/2019-15:50	
Arthur Ravenel Jr Company	RTV \$40.00	Action		03/12/2019-14:33	03/29/2019-14:33	
Arthur Ravenel Jr Company	Archived RTV	Filing		03/12/2019-00:00	03/29/2019-00:00	


  

Financials			
Summary			
Fine/Costs:	\$45.00	Total Paid for fine/costs:	\$45.00
Balance Due:	\$0.00		
Costs			
Description	Cost Code	Amount	Disbursed Amount
SCJD Filing Fee Other Summary \$10	SCJDFE	\$10.00	\$10.00
Certificate of Mailing for Service RTV	CVMAIL	\$5.00	\$5.00
Civil Filing Fee County 44%/100%	CVFFCN	\$20.00	\$20.00
Service Fee \$10	SRVFEE	\$10.00	\$10.00
Payments			
Payment Date	Receipt Number	Entered By	Transaction Type Code
03/19/2019	1330451	SUMSML	CV
03/12/2019	1330421	SUMSML	CV

This is a 2019 docket from the other civil eviction which was, I believe, commandeered from Judge Harris by Judge Mccann against my son. I believe it was illegal. A separate docket was created for Mccann's ejection, but I included this docket from originally-assigned judge Harris in order to demonstrate that a hearing that happened before Harris (I can prove it happened because I wrote Harris a letter about it in 2019) seems to have been removed by someone from this 2019 docket when, I believe, the case commandeering arose. During the seemingly removed hearing, Judge Harris had called my son's opponents out for lying in court and essentially threatened to jail them by stating he had jailed prior parties for lying in court. My son's roommate, John Anthony, had fled without legal process, leaving only my son as the final contending tenant and party in what seemed to me to resemble a ponzi-style security deposit scheme by folks I consider to be wealthy slumlords. This happened soon after my grown son, Tristen Nesbitt, was shot in the state and never received assistance, services, or compensation for that. Within 3 years, I saw my son's shooter on my social media out of prison and suggested as a "friend" for me.

# EXHIBIT 1

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



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### The State of South Carolina VS Tony M Chayban

Case Number:	2021A1010203060	Court Agency:	James Island Magistrate	Filed Date:	06/06/2021
Case Type:	Criminal	Case Sub Type:			
Status:	Pre-Trial Conference	Assigned Judge:		Disposition Judge:	
Disposition:					
Disposition Date:		Date Received:		Arrest Date:	06/06/2021
Law Enf. Case:		True Bill Date:		No Bill Date:	
Prosecutor Case:		Indictment Number:		Waiver Date:	
Probation Case:					

---

#### Case Parties

Click the icon to show associated parties.

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
Chayban, Tony M	324 Howle Ave Charleston SC 29412-2419		M	1957	Defendant		06/16/2021
Chayban, Tony M	324 Howle Ave Charleston SC 29412-2419				Bond Entry		06/06/2021
Dahlheim, Katherine J.	4045 Bridge View Drive Suite 300 Charleston SC 29405				Solicitor		08/12/2021
Hickman, Timothy J	3691 Leeds Avenue North Charleston SC 29405-				Officer		06/06/2021
Woosley, Cassandra L.	O.T. Wallace Bldg. 101 Meeting St., 5Th Floor Charleston SC 29401				Public Defender		08/12/2021

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#### Charges

Name	Charge Code - Charge Description	Original Charge Code - Original Charge	Disposition Date
Chayban, Tony M	3414-Assault / Assault & Battery 3rd degree	3414-Assault / Assault & Battery 3rd degree	

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#### Associated Cases

Agency	Case #	External	Relationship	Description	Case Filed Date	Disposition Date	Case Status	Disposition
Bond Court	2021A1010203060	Y		Associated by Case Transfer	06/06/2021	06/06/2021	Transferred	Transferred from Bond Court/Other Court

---

#### Actions

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Chayban, Tony M	Criminal/Traffic Pre-Trial Hearing	Event		08/25/2022-12:15		
Chayban, Tony M	Archived Court Summons	Filing		07/06/2022-00:00		
Chayban, Tony M	Criminal/Traffic Pre-Trial Hearing	Event		03/24/2022-10:00	03/24/2022-16:30	
Chayban, Tony M	Archived Court Summons	Filing		12/16/2021-00:00		
Chayban, Tony M	Criminal/Traffic Pre-Trial Hearing	Event		12/09/2021-11:45	12/10/2021-16:30	
Chayban, Tony M	Archived Court Summons	Filing		11/12/2021-00:00		
Chayban, Tony M	Criminal/Traffic Court	Event		09/01/2021-10:00	08/12/2021-16:30	
Chayban, Tony M	Jury Trial Requested	Filing		08/12/2021-09:45		
Chayban, Tony M	Archived Court Summons	Filing		08/12/2021-00:00		
Chayban, Tony M	Motion/Motion to amend bond conditions	Motion		06/28/2021-11:00	06/28/2021-14:39	
Chayban, Tony M	Archived Court Summons	Filing		06/16/2021-00:00		
Chayban, Tony M	Archived Court Summons	Filing		06/16/2021-00:00		
Chayban, Tony M	Bond Comment To Notes Screen	Filing		06/06/2021-13:18		
Chayban, Tony M	Bond Hearing	Event		06/06/2021-10:00	06/16/2021-10:30	

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#### Financials

**Summary**

Fine/Costs:	\$1,087.00	Total Paid for fine/costs:	\$0.00	Balance Due:	\$1,087.00
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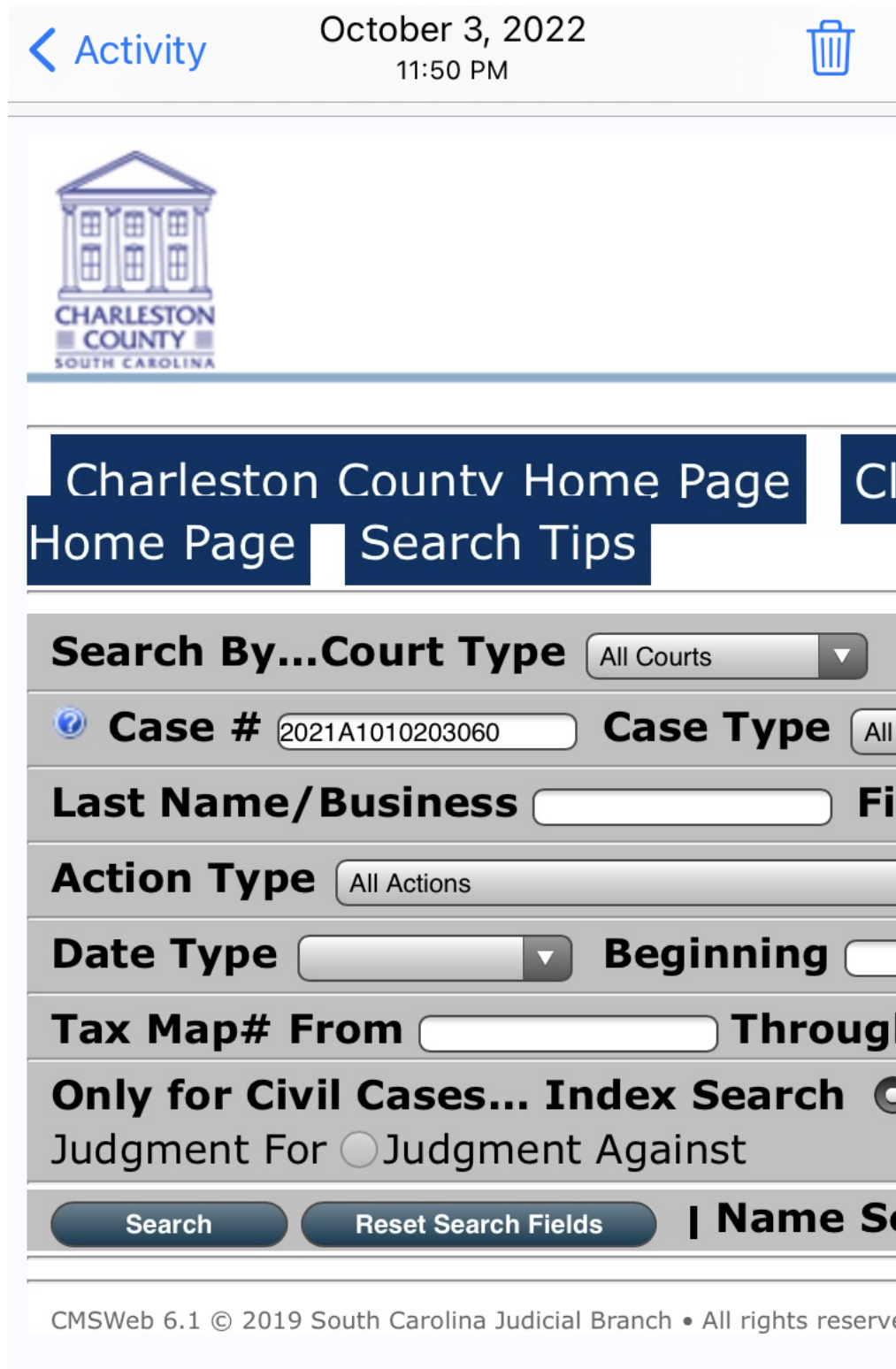
**Costs**

Description	Cost Code	Amount	Charge Action	Disbursed Amount

This is one of many screenshots I took of the took of the events in the 2021 criminal assault case (#2021A1010203060) against Tony Chayban wherein my son is the victim before our, I believe, malevolent opponents hid the docket from public view. Features Dahlheim and public defender Woosley participating with the multi-millionaire after Mccann took the case off Harris' docket after Mccann's civil decision surrounding the same parties was appealed.

## EXHIBIT 2

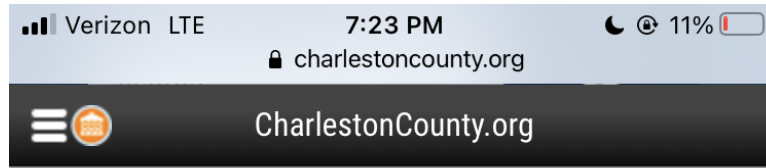
AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



Monitoring/screenshottng efforts of the referenced ISIS criminal assault action wherein the case had then been removed from public index — case was hidden as of this date. Terrorist threats mentioned in police report.

## EXHIBIT 3

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



## Legal

The Legal Department advises, represents and defends Charleston County and County employees before courts and administrative bodies. The department includes a County Attorney, Deputy Attorneys, Contracts Attorney, Assistant Attorneys and Legal Secretaries. This Department is also responsible for drafting and enforcing [ordinances](#) and collecting existing claims in favor of Charleston County.

## Responsibilities

- Advise, represent and defend [County Council](#), its members, the County and its employees, and the [elected officials](#) and appointed officials before courts and administrative bodies
- Provide legal services relating to County real estate transactions, bond issues, procurement, contracts, taxes, personnel, drafting and enf



## Contact

### Legal

Lonnie Hamilton, III Public Service Building



4045 Bridge View Drive

North Charleston, SC 29405

**Fax:** [\(843\)958-4017](tel:(843)958-4017)

**Office Hours:**

This is a portion of Dahlheim's job description indicating her office is charged with representing the interests of appointed officials like Judge Mccann. Dahlheim began participation in the criminal assault action wherein a conflict-of-interest existed between the victim and Mccann, wherein an appeal had been initially filed in a coinciding civil matter, and wherein my son prevailed against Mccann's illegal civil verdict at City Small Claims. Dahlheim never contacted us back about illegal (based on my interpretation of the law) backdoor pretrial hearings, never assigned an advocate, never offered an opportunity to give victim statement.. No resources or help offered.

# **EXHIBIT 4**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF CHARLESTON

2022-CP-10-0613

Gene Castagnetti  
Plaintiff

APPEAL

-VERSUS-

Michael Beavers  
Defendant

Magistrate/Municipal Judge's name:

Mccann

2022 FEB -9 AM 9:28  
JULIE J. ARNSTADT  
CLERK OF COURT

FILED

1. Gene Castagnetti (Plaintiff) Defendant in this civil action make the following claim.

1. I believe that the plaintiff/Defendant resides in Charleston County and is within the jurisdiction of this court.

2. I make this appeal based on the following errors committed by the lower court.

I feel the hearing was unfair  
The Judge would not look at any of my evidence  
He barely let me speak my case  
I also believe errors in the law were made

3. I believe, because of the above information, that I am entitled to and request an Appeal hearing and a delay of eviction

I state under penalty of perjury that the above is correct and truthful.

Dated 9/2/22

Signed Gene Castagnetti

Address of plaintiff  
324 Howle Ave  
Charleston SC 29412

Address of defendant  
2010 Cold Spring Dr  
#A  
North Charleston SC 29406


509 505 4002  
Telephone number

843 222 1856  
Telephone number

Another victim of Mccann's, I believe, illegal civil evictions vs. Tony Chayban's 324 Howle Avenue frontman, Michael Beavers: Castagnetti clearly states that Mccann refused to review his evidence also at James Island Magistrate Court. In addition, Castagnetti only received a 10-day notice following my son's earlier informing Mccann in writing about 30-day notices being required by law. I know about the 10-day notice because the victim (Castagnetti) told me about it in writing when questioned by me about the events.

**EXHIBIT 5**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



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### Michael Christopher Beavers VS Gene Castignetti

<b>Case Number:</b>	2022CV1011300013	<b>Court Agency:</b>	James Island Magistrate	<b>Filed Date:</b>	01/13/2022
<b>Case Type:</b>	Civil	<b>Case Sub Type:</b>	Rule to Vacate \$40	<b>File Type:</b>	
<b>Status:</b>	Appeal	<b>Assigned Judge:</b>			
<b>Disposition:</b>		<b>Disposition Date:</b>		<b>Disposition Judge:</b>	
<b>Original Source Doc:</b>		<b>Original Case #:</b>			
<b>Judgment Number:</b>		<b>Court Roster:</b>			

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#### Case Parties

Click the icon to show associated parties.

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
Beavers, Michael Christopher	2010 Coldspring Drive #A North Charleston SC 29406	White	M	1965	Plaintiff		01/13/2022
Castignetti, Gene	324 Howle Avenue Room 7 Charleston SC 29412				Defendant		01/13/2022

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#### Actions

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Beavers, Michael Christopher	Appeal/Appeal Returned Issued	Filing		03/10/2022-11:24		
Beavers, Michael Christopher	Appeal filed	Filing		02/11/2022-14:05		
Beavers, Michael Christopher	Civil Court (no summons)	Event		02/07/2022-10:00		
Beavers, Michael Christopher	Service/Affidavit Of Service	Filing		01/18/2022-10:50		
Beavers, Michael Christopher	Service/Proof Of	Filing		01/18/2022-00:00		
Beavers, Michael Christopher	RTV Documents	Filing		01/14/2022-08:36		
Beavers, Michael Christopher	Non Payment of Rent	Filing		01/14/2022-08:35		
Beavers, Michael Christopher	Archived RTV	Filing		01/14/2022-00:00		
Beavers, Michael Christopher	Archived RTV	Filing		01/14/2022-00:00		
Beavers, Michael Christopher	RTV \$40.00	Action		01/13/2022-16:16		

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#### Financials

##### Summary

<b>Fine/Costs:</b>	\$40.00	<b>Total Paid for fine/costs:</b>	\$40.00	<b>Balance Due:</b>	\$0.00
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##### Costs

Description	Cost Code	Amount	Charge Action	Disbursed Amount
Service Fee \$10	SRVFEE	\$10.00		\$10.00
Civil Filing Fee County 44%/100%	CVFFCN	\$20.00		\$20.00
SCJD Filing Fee Other Summary \$10	SCJDFF	\$10.00		\$10.00

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##### Payments

Payment Date	Receipt Number	Entered By	Transaction Type Code	Payment Amount
01/13/2022	1334059	SUMSML	CV	\$40.00

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Castagnetti lower court case relative to prior Exhibit: Example of Judge name being removed when it appeared, to me, that Mccann was the only judicial participant at James Island Magistrate Court — in this case, wherein his decision (which included multiple identical elements to my son’s illegal civil eviction — judicial refusal to review evidence in my presence at court, illegally-shortened notice period) was under appeal.

# EXHIBIT 6

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM

The screenshot shows a mobile application interface for a court case. At the top, the title is "Tony Chayban VS Tristen Nesbitt". Below the title is a table with case details:

Case Number:	2021CV1011300146	Court Agency:	James Island Magistrate
Case Type:	Civil	Case Sub Type:	Rule to Vacate \$40
Status:	Scheduled	Assigned Judge:	
Disposition:	Find for Plaintiff	Disposition Date:	06/14/2021
Original Source Doc:		Original Case #:	
Judgment Number:	2021CV1011300146	Court Roster:	

Below the table are tabs for "Case Parties", "Judgments", "Tax Map Information", "Associated Cases", "Actions", and "Financials". Under "Case Parties", there is a checkbox checked and the text "Click the icon to show associated parties." Below this is a table of parties:

Name	Address	Race	Sex	Year
Chayban, Tony	324 Howle Avenue Charleston SC 29412			
Nesbitt, Tristen	324 Howle Ave Charleston SC 29412			

At the bottom of the screen, it says "CMSWeb 6.1 © 2019 South Carolina Judicial Branch • All rights reserved".

This is one of the many screenshots I took of the illegal civil eviction docket against my son in the blazing early July 2021 sun while transporting my grown son, the Defendant herein, to an emergency shelter because of what Francis Mccann did to him in this action following months of directing police not to protect my from from literal ISIS terrorism. As you see, the action is “scheduled” for the subsequent hearings Mccann would hold to taint my son’s and my reputations and limit his own liabilities once he received my son’s 6/16/2021 notice of appeal on basis of a clear violation of the 30-day notice period. The illegal finding in favor of an ISIS terrorist on whom Mccann refused to review evidence had already arisen, but I believe he was obsessed with holding additional hearings in order to favor the terrorist even further against my grown son. Mccann also took false exculpatory statements in the form of a Motion to Amend Bond Conditions in the criminal assault case whereafter terrorist attacks continued to occur and heightened because of Mccann’s actions and my son was illegally ousted, despite an appeal bond being set. Chayban and his cronies repeatedly broke into my son’s room on video following Mccann’s faulty bond modification which allowed the terrorist (Chayban) back at 324 Howle Avenue, forcing my son to flee his home without reasonable legal process.

**EXHIBIT 7**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM

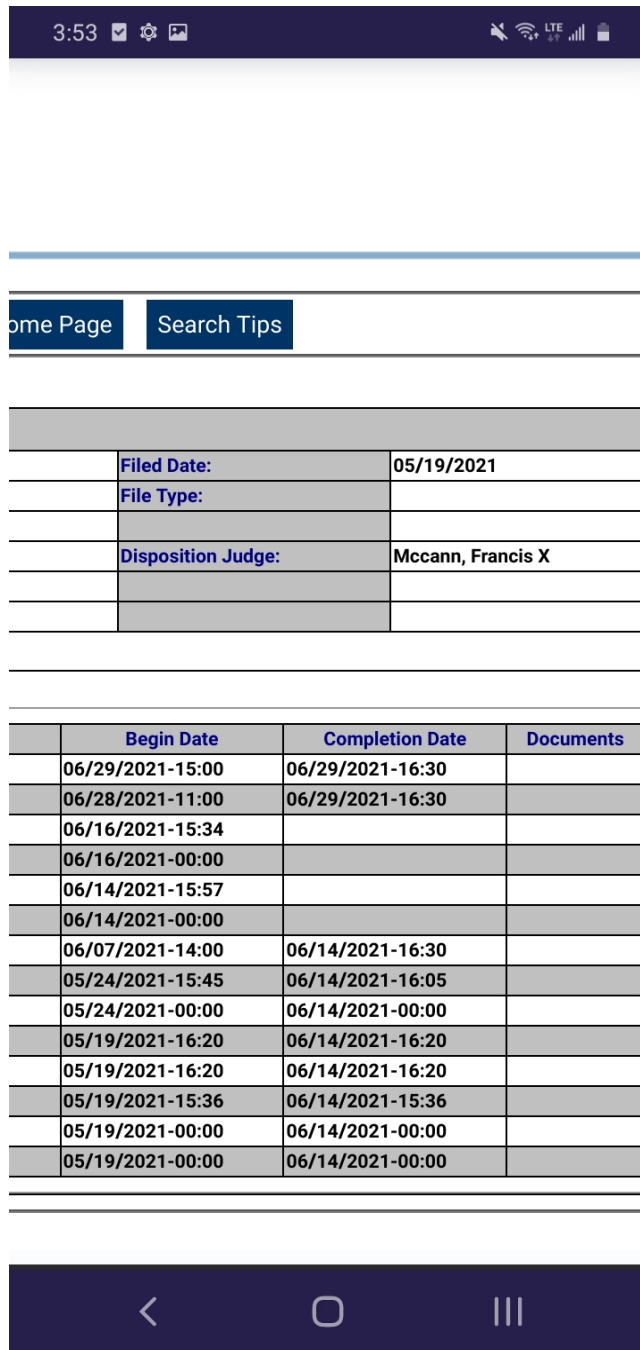
Name	Description	Type	Motion Roster	
Chayban, Tony	Civil Court (no summons)	Event		06/29
Chayban, Tony	Civil Court	Event		06/28
Chayban, Tony	Appeal/Notice of Appeal	Filing		06/16
Chayban, Tony	Archived Court Summons	Filing		06/16
Chayban, Tony	Writ of Ejectment with Document	Filing		06/14
Chayban, Tony	Writ Document Printed	Filing		06/14
Chayban, Tony	Civil Court (no summons)	Event		06/07
Chayban, Tony	Service/Affidavit Of Service	Filing		05/24
Chayban, Tony	Service/Proof Of	Filing		05/24
Chayban, Tony	RTV Documents	Filing		05/19
Chayban, Tony	Non Payment of Rent	Filing		05/19
Chayban, Tony	RTV \$40.00	Action		05/19
Chayban, Tony	Archived RTV	Filing		05/19
Chayban, Tony	Archived RTV	Filing		05/19

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One of many additional early July 2021 screenshots of civil case # 2021CV1011300146 as pictured in the prior Exhibit — showing general case events and dates as of that time

**EXHIBIT 8**


AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



One of many additional early July 2021 screenshots of civil case # 2021CV1011300146 as pictured in the prior 2 Exhibits — showing events from 6/14 and 6/16/2021 seemingly had no completion dates or times listed as of early July 2021

## EXHIBIT 9

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



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**Tony Chayban VS Tristen Nesbitt**

<b>Case Number:</b>	2021CV1010600628	<b>Court Agency:</b>	Small Claims - City	<b>Filed Date:</b>	05/21/2021
<b>Case Type:</b>	Civil	<b>Case Sub Type:</b>	Summons & Complaint	<b>File Type:</b>	
<b>Status:</b>	Disposed	<b>Assigned Judge:</b>	Beck, Laura Dukes		
<b>Disposition:</b>	Find for Defendant	<b>Disposition Date:</b>	11/17/2021	<b>Disposition Judge:</b>	Beck, Laura Dukes
<b>Original Source Doc:</b>		<b>Original Case #:</b>			
<b>Judgment Number:</b>		<b>Court Roster:</b>			

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[Financials](#)

Click the  icon to show associated parties.


Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
Chayban, Tony	738 Avenida Abeja San Marcos CA 92069				Plaintiff		11/17/2021
Nesbitt, Tristen	324 Howle Ave Charleston SC 29412				Defendant		05/21/2021

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Though my son prevailed against self-professed ISIS terrorist Tony Chayban at City Small Claims when Chayban sought to collect on the illegal judgment described in Mccann’s illegal civil case # 2021CV1011300146 decision, Mccann, Chayban, and their many other cronies refused to leave us alone, commandeering the criminal assault action against Chayban and using it to try to exonerate guilty Chayban and ruin our reputations and businesses — and that’s besides the criminal railroading which included additional brutal assault that I believe was contracted by these participants to make my son move illegally over the course of case # 2021CV1011300146 because my son demanded legal process against a terrorist.

**EXHIBIT 10**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



**Julie J. Armstrong**  
Charleston County Clerk of Court

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David M Giles VS Magistrates Court of South Carolina , defendant, et al

Case Number:	2018CP1005678	Court Agency:	Common Pleas	Filed Date:	11/30/2018
Case Type:	Appeal	Case Sub Type:	Magistrate Crim 920	File Type:	Non-Jury
Status:	Transferred	Assigned Judge:	Clerk Of Court C P, G S, And Family Court		
Disposition:	Removed to Other Court (Fed or District)	Disposition Date:	05/24/2019	Disposition Judge:	Price, Bentley
Original Source Doc:		Original Case #:			
Judgment Number:		Court Roster:			

Case Parties

Click the icon to show associated parties.

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
<input checked="" type="checkbox"/> Dahlhim, Katherine					Defendant		12/03/2018
Dahlhim, Katherine	615 Riverland Drive Charleston SC 29412				Defendant Pro Se		12/03/2018
Knisley, Edward L. Jr.	4045 Bridge View Dr. North Charleston SC 294057464				Respondent Attorney		12/12/2018
<input checked="" type="checkbox"/> Dahlhim, Katherine	615 Riverland Drive Charleston SC 29412				Defendant Pro Se		12/03/2018
Dahlhim, Katherine					Defendant		12/03/2018
<input checked="" type="checkbox"/> Dahlhim, Katherine Prosecutor					Defendant		12/03/2018
Knisley, Edward L. Jr.	4045 Bridge View Dr. North Charleston SC 294057464				Respondent Attorney		12/12/2018
<input checked="" type="checkbox"/> Giles, David M					Appellant		05/29/2019
Giles, David M	9047 Hackney Court North Charleston SC 29406				Appellant Pro Se		12/19/2018
<input checked="" type="checkbox"/> Giles, David M	9047 Hackney Court North Charleston SC 29406				Appellant Pro Se		12/19/2018
<input checked="" type="checkbox"/> Knisley, Edward L. Jr.	4045 Bridge View Dr. North Charleston SC 294057464				Respondent Attorney		12/12/2018
<input checked="" type="checkbox"/> Magistrates Court of South Carolina					Respondent		11/30/2018
Knisley, Edward L. Jr.	4045 Bridge View Dr. North Charleston SC 294057464				Respondent Attorney		12/12/2018
<input checked="" type="checkbox"/> McCann, Francis X					Defendant		12/03/2018
Knisley, Edward L. Jr.	4045 Bridge View Dr. North Charleston SC 294057464				Respondent Attorney		12/12/2018
McCann, Francis X	Post Office Box 1226 James Island SC 29422				Magistrate		12/05/2018
<input checked="" type="checkbox"/> McCann, Francis X Magistrate					Defendant		12/03/2018
Knisley, Edward L. Jr.	4045 Bridge View Dr. North Charleston SC 294057464				Respondent Attorney		12/12/2018

Actions

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
	Miscellaneous Documents	Filing		06/06/2019-09:17		
	Order-Appeal for New Trial Removed to Federal Court Denied	Order		05/24/2019-11:59		
Giles, David M	5/13/2019 MOTION Roster/Notice of Motions Roster Publication	Action		04/10/2019-08:54	05/24/2019-08:54	
McCann, Francis X	5/13/2019 MOTION Roster/Notice of Motions Roster Publication	Action		04/10/2019-08:54	05/24/2019-08:54	
Dahlhim, Katherine	5/13/2019 MOTION Roster/Notice of Motions Roster Publication	Action		04/10/2019-08:54	05/24/2019-08:54	
Knisley, Edward L. Jr.	5/13/2019 MOTION Roster/Notice of Motions Roster Publication	Action		04/10/2019-08:54	05/24/2019-08:54	
	Miscellaneous Documents	Filing		01/08/2019-14:14	05/24/2019-14:14	
Giles, David M	Federal Court Venue Demand & Jury Trial Demand	Filing		12/20/2018-13:33	05/24/2019-13:33	
Giles, David M	Jurisdictional Challenge	Filing		12/17/2018-11:36	05/24/2019-09:32	
Giles, David M	Appellants Return	Filing		12/17/2018-08:43	05/24/2019-08:43	
Giles, David M	Appeal/Notice of Criminal Appeal No Fee (Workflow)	Action		12/10/2018-11:34	05/24/2019-11:34	
McCann, Francis X	Magistrate Return	Filing		12/04/2018-15:24	05/24/2019-15:24	
Giles, David M	Addendum to Motion	Filing		11/30/2018-11:35	05/24/2019-09:31	
Giles, David M	Notice of Criminal Appeal	Motion		11/30/2018-11:34	05/17/2019-11:34	
Giles, David M	Notice of Criminal Appeal Filing Fee: No Fee	Filing		11/30/2018-11:33	05/24/2019-11:33	

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Unrelated criminal appeal docket featuring Francis X. Mccann and Katherine Dahlheim, who was listed as a prosecutor in this action and whose name was misspelled. Case details included the Defendant wanting to proceed with his case at the lower court, seemingly claiming it wasn't heard, and describing an in-person meeting with Dahlheim at James Island Magistrate Court in the context of believing she was the prosecutor who was seemingly refusing Giles a hearing. Dahlheim and Mccann are seemingly co-respondents who are mutually represented by Knisely, Dahlheim's colleague at the County Attorney's office, in this action. See Exhibit 23.

# EXHIBIT 11

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM

Done Safari - Sep 1, 2022 at 2/02 A...

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**Michael Beavers , plaintiff, et al VS Trevon McClurkin**

Case Number:	2022CV1011300218	Court Agency:	James Island Magistrate	Filed Date:	08/26/2022
Case Type:	Civil	Case Sub Type:	Rule to Vacate \$40	File Type:	
Status:	Pending	Assigned Judge:	Harris, William Stephen Jr	Disposition Judge:	
Disposition:		Disposition Date:		Disposition Judge:	
Original Source Doc:		Original Case #:			
Judgment Number:		Court Roster:			

**Case Parties**

Click the icon to show associated parties.

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
Beavers, Michael	P O Box 54 Folly Beach SC 29439				Plaintiff		08/26/2022
McClurkin, Trevon	324 Howle Ave Room 4 Charleston SC 29412				Defendant		08/26/2022
Tolkin Lic	P O Box 54 Folly Beach SC 29439				Plaintiff		08/26/2022

**Actions**

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Beavers, Michael	Service/Proof Of	Filing		08/30/2022-00:00		
Beavers, Michael	Service/Affidavit Of Service	Filing		08/29/2022-18:15		
Tolkin Lic	RTV Documents	Filing		08/26/2022-14:43		
Beavers, Michael	RTV Documents	Filing		08/26/2022-14:43		
Tolkin Lic	Non Payment of Rent	Filing		08/26/2022-14:42		
Beavers, Michael	Non Payment of Rent	Filing		08/26/2022-14:42		
Beavers, Michael	RTV \$40.00	Action		08/26/2022-14:28		
Beavers, Michael	Archived RTV	Filing		08/26/2022-00:00		
Beavers, Michael	Archived RTV	Filing		08/26/2022-00:00		
Beavers, Michael	Archived RTV	Filing		08/26/2022-00:00		
Tolkin Lic	Archived RTV	Filing		08/26/2022-00:00		
Tolkin Lic	Archived RTV	Filing		08/26/2022-00:00		

**Financials**

**Summary**

Fine/Costs:	\$40.00	Total Paid for fine/costs:	\$40.00	Balance Due:	\$0.00
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**Costs**

Description	Cost Code	Amount	Charge Action	Disbursed Amount
Civil Filing Fee County 44%/100%	CVFFCN	\$20.00		\$20.00
Service Fee \$10	SRVFEE	\$10.00		\$10.00
SCJD Filing Fee Other Summary \$10	SCJDFF	\$10.00		\$10.00

**Payments**


Payment Date	Receipt Number	Entered By	Transaction Type Code	Payment Amount
08/26/2022	1335011	SUMCDR	CV	\$40.00

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Yet another unrelated (I/we don't know this person) 324 Howle Avenue eviction by ISIS terrorist Chayban's frontman, Michael Beavers, which was originally assigned to Judge Stephen Harris at James Island, but was seemingly commandeered and disposed by Mccann in favor of Chayban's illegal outfit. Assigned judge above is listed as Harris.

**EXHIBIT 12**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



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**Michael Beavers , plaintiff, et al VS Trevon McClurkin**

Case Number:	2022CV1011300218	Court Agency:	James Island Magistrate	Filed Date:	08/26/2022
Case Type:	Civil	Case Sub Type:	Rule to Vacate \$40	File Type:	
Status:	Settled	Assigned Judge:	Harris, William Stephen Jr	Disposition Judge:	Mccann, Francis X
Disposition:	Settled	Disposition Date:	09/19/2022	Disposition Judge:	Mccann, Francis X
Original Source Doc:		Original Case #:			
Judgment Number:	2022CV1011300218	Court Roster:			

**Case Parties**

Click the icon to show associated parties.

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
Beavers, Michael	P O Box 54 Folly Beach SC 29439				Plaintiff		09/19/2022
Mcclurkin, Trevon	324 Howle Ave Room 4 Charleston SC 29412				Defendant		09/19/2022
Tolkin Lic	P O Box 54 Folly Beach SC 29439				Plaintiff		08/26/2022

**Judgments**

For:	Beavers, Michael	Against:	Mcclurkin, Trevon	Judg. Amount:	\$0.00	Judgment Date:	09/19/2022
Description:		Disposition:		Disp. Date:		Date Entered/Last Changed:	09/19/2022 --
Notes:	None						

**Judgment Details**

Claims Code	Detail Desc.	Detail Amount	Detail Date
None			

**Actions**

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Beavers, Michael	Service/Proof Of	Filing		08/30/2022-00:00	09/19/2022-00:00	
Beavers, Michael	Service/Affidavit Of Service	Filing		08/29/2022-18:15	09/19/2022-10:43	
Tolkin Lic	RTV Documents	Filing		08/26/2022-14:43	09/19/2022-14:43	
Beavers, Michael	RTV Documents	Filing		08/26/2022-14:43	09/19/2022-14:43	
Tolkin Lic	Non Payment of Rent	Filing		08/26/2022-14:42	09/19/2022-14:42	
Beavers, Michael	Non Payment of Rent	Filing		08/26/2022-14:42	09/19/2022-14:42	
Beavers, Michael	RTV \$40.00	Action		08/26/2022-14:28	09/19/2022-14:28	
Beavers, Michael	Archived RTV	Filing		08/26/2022-00:00	09/19/2022-00:00	
Beavers, Michael	Archived RTV	Filing		08/26/2022-00:00	09/19/2022-00:00	
Beavers, Michael	Archived RTV	Filing		08/26/2022-00:00	09/19/2022-00:00	
Tolkin Lic	Archived RTV	Filing		08/26/2022-00:00	09/19/2022-00:00	
Tolkin Lic	Archived RTV	Filing		08/26/2022-00:00	09/19/2022-00:00	

**Financials**

Summary					
Fine/Costs:	\$40.00	Total Paid for fine/costs:	\$40.00	Balance Due:	\$0.00

Costs					
Description	Cost Code	Amount	Charge Action	Disbursed Amount	
Civil Filing Fee County 44%/100%	CVFFCN	\$20.00		\$20.00	
Service Fee \$10	SRVFEE	\$10.00		\$10.00	
SCJD Filing Fee Other Summary \$10	SCJDFF	\$10.00		\$10.00	


Payments					
Payment Date	Receipt Number	Entered By	Transaction Type Code	Payment Amount	
08/26/2022	1335011	SUMCDR	CV	\$40.00	

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Disposition from prior Exhibit showing 324 Howle Avenue owner Tony Chayban and frontman Michael Beavers' seemingly favorite judge, Mccann, having seemingly commandeered another one of Harris' cases in their favor

# EXHIBIT 13

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



**Julie J. Armstrong**  
Charleston County Clerk of Court

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**Marisol C Ybarra VS Franis McCann**

Case Number:	2022CP1004077	Court Agency:	Common Pleas	Filed Date:	09/01/2022
Case Type:	Appeal	Case Sub Type:	Magistrate Crim 920	File Type:	Non-Jury
Status:	Disposed	Assigned Judge:	Clerk Of Court C P, G S, And Family Court	Disposition Judge:	Price, Bentley
Disposition:	Ended by Non Jury	Disposition Date:	11/15/2022	Original Case #:	
Original Source Doc:		Court Roster:		Judgment Number:	

**Case Parties**

Click the icon to show associated parties.

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
Honorable Francis X Mccann	615 Riverland Drive Charleston SC 29412				Magistrate		09/06/2022
Knisley, Edward L. Jr.	4045 Bridge View Dr. North Charleston SC 294057464				Respondent Attorney		09/27/2022
McCann, Franis					Respondent		09/01/2022
McCann, Franis	615 Riverland Drive Charleston SC 29412				Respondent Pro Se		09/06/2022
South Carolina State of					Respondent		09/27/2022
Ybarra, Marisol C					Appellant		11/15/2022
Ybarra, Marisol C	106 Chicoma Dr Townville SC 29689				Appellant Pro Se		09/06/2022

**Actions**

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
McCann, Franis	NEF(11-15-2022 02:27:02 PM) Order/Electronic Form 4	Filing		11/15/2022-14:27		
McCann, Franis	Order/Appeal is Denied	Order		11/15/2022-14:27	11/15/2022-14:27	
Ybarra, Marisol C	10/24/2022_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/03/2022-08:47	11/15/2022-08:47	
McCann, Franis	10/24/2022_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/03/2022-08:47	11/15/2022-08:47	
Honorable Francis X Mccann	10/24/2022_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/03/2022-08:47	11/15/2022-08:47	
Knisley, Edward L. Jr.	10/24/2022_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/03/2022-08:47	11/15/2022-08:47	
Honorable Francis X Mccann	10/24/2022_MOTIONS_Roster/Notice of Motions Roster Publicati	Action		09/28/2022-16:50	11/15/2022-16:50	
Knisley, Edward L. Jr.	10/24/2022_MOTIONS_Roster/Notice of Motions Roster Publicati	Action		09/28/2022-16:50	11/15/2022-16:50	
McCann, Franis	10/24/2022_MOTIONS_Roster/Notice of Motions Roster Publicati	Action		09/28/2022-16:50	11/15/2022-16:50	
Ybarra, Marisol C	10/24/2022_MOTIONS_Roster/Notice of Motions Roster Publicati	Action		09/28/2022-16:50	11/15/2022-16:50	
Honorable Francis X Mccann	Transmittal Of Appeal/Magistrates Return	Filing		09/14/2022-11:36	11/15/2022-11:36	
Ybarra, Marisol C	Appeal/Notice of Criminal Appeal No Fee (Workflow)	Action		09/11/2022-11:45	11/15/2022-11:45	
Ybarra, Marisol C	Motion/Appeal	Motion		09/01/2022-11:45	10/24/2022-11:45	
Ybarra, Marisol C	Notice of Criminal Appeal	Filing		09/01/2022-11:44	11/15/2022-11:44	

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An unrelated Francis X. Mccann appeal docket wherein the lower case events and notes (yes, I saved them) indicate the Defendant was specifically told she MUST appear in-person in order to apply for indigent criminal defense, demonstrating that the office of local indigent defense does enforce such in-person application mandates for other criminal Defendants who are not Tony Chayban. Therefore, I am requesting video-recorded date/time-stamped proof that Chayban applied in-person for the indigent defense the multi-millionaire fraudulently received in the 2021 assault case (#2021A1010203060) wherein my son, the victim, was railroaded and abused instead. I would also like to see a copy of Chayban's indigent defense application with a verifiable (date/time-stamped) digital signature that I may investigate along with the requested video because of my prior knowledge of area misuse of the TOPAZ technology when it's clearly been implemented so that other fraud cannot be committed by traditional "backdating" strategies. I want answers as to why and how Chayban was ever assigned a public defender — please. Please note that, like Dahlheim's name in the Giles appeal, Francis Mccann's name is misspelled on this appeal docket ("Franis.").

# EXHIBIT 14

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE  
FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM

scsolicitor9.org

- must offer the victim assistance in preparing a comprehensive victim impact statement, and assistance in reviewing and updating the statement as appropriate before the case is disposed;
- must inform victims and witnesses of the applicable procedures and practices of the criminal or juvenile justice system, or both;
- must inform each victim of his right to legal counsel and of any available civil remedies;
- must return to a victim personal property recovered or taken as evidence as expeditiously as possible, substituting photographs of the property and itemized lists of the property including serial numbers and unique identifying characteristics to use as evidence when possible;
- must inform victims and prosecution witnesses of financial assistance, compensation and fees; and offer to the victims and witnesses assistance with application for these items:
- upon request, must make a reasonable attempt to keep each victim informed of the status and progress of a case, with the exception of preliminary hearings;
- must discuss a case with the victim and confer with each victim about the disposition of the case including, but not limited to, diversions and plea negotiations;
- must reasonably attempt to notify each victim of each hearing, trial, or other proceeding;

Some of the many ignored mandates in Dahlheim's alleged capacity as a "solicitor" in the criminal assault case against Chayban wherein my son is the victim; she never responded to our efforts to reach out to her, instead proceeding, from my perspective and experience, as though the victim and family didn't exist and, I believe, participating in the context of limiting Mccann's liability, which meant harming the victims' reputations inappropriately and illegally.

## **EXHIBIT 15**



# SCCID

SOUTH CAROLINA COMMISSION ON INDIGENT DEFENSE

**NOTE: Chayban is "at least" a "millionaire."**

## SCCID Public Defenders - Charleston County

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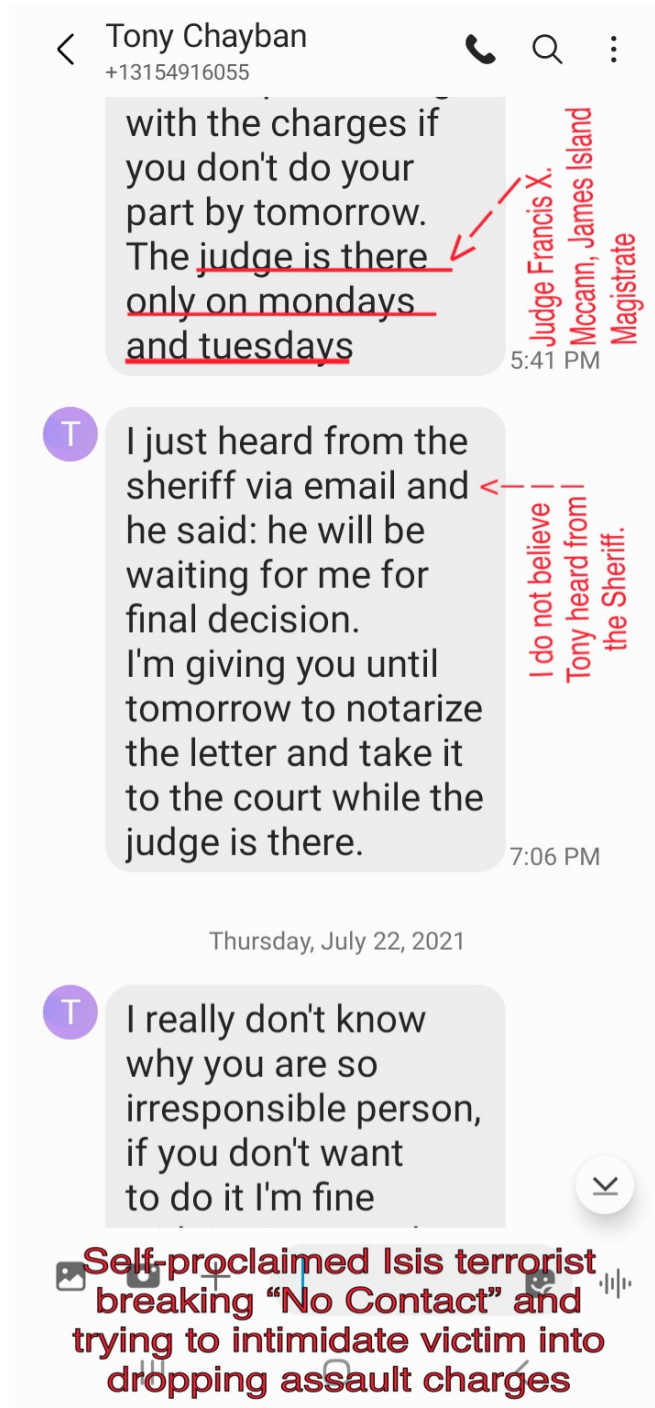
Every person has the right to a fair trial. It is the law of our country that competent representation by an attorney is necessary to preserve this fundamental right. State and federal law provides that all persons have the constitutional right to be represented by an attorney if they have been accused of a crime and the punishment for that crime could be time in jail or prison. If that person is financially unable to hire an attorney, then the law provides that an attorney shall be appointed to represent them.

A Public Defender is appointed by the Court to represent defendants in criminal court who are financially indigent. All Public Defenders are attorneys who have been licensed to practice law in the state of South Carolina.

There are more than 200 Public Defenders serving those in need within our state. For more information and for assistance, contact the Public Defender office for the county where you have been charged with the crime.

**EXHIBIT 16**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



A self-professed (on video) ISIS terrorist charged with criminally assaulting my son trying to strongarm my grown son, the victim, into dropping assault charges. Terrorist has clearly been made aware of the days ONLY Mccann will be at James Island Magistrate Court so that the group can carry out what I believe were/are their illegal agendas.

**EXHIBIT 17**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM

2022-CP-10-4077

APPEAL

Docket: 20210420207843  
Marisol C. Ybarra  
106 Chicoma Dr.  
Townville, SC 29689  
DL: 105990910

\*NOTE: Aug. 17-19, 2022 was a Wednesday-Friday, the time when Hon. Stephen Harris (not Francis X. Mccann) works as sole James Island magistrate judge. I know Mccann works Monday and Tuesday because an admitted ISIS terrorist told my son that while trying to intimidate my son/victim into dropping criminal assault charges against him in that court (evidence included elsewhere).

2022 SEP - 1 AM 11:46  
JULIE J. ARNSTRONG  
CLERK OF COURT

FILED

I am appealing the ruling that took place on August 1, 2022 as I was denied the right to defend myself in court. I requested a continuance on August 1, 2022. I live in Anderson county and was unable to make the 4 hour car ride to Charleston. It was also the reason that I was unable to apply for a public defender (in December 2021) as that has to be done in person. I was still in the process of securing legal representation due to dire financial straits for the Aug. 1 court date but was unaware of the time limit to do so.

When I missed the Aug. 1 court date, I received a letter on Aug. 3 and contacted the James Island Magistrate court on Aug. 4 to determine what recourse I had and was told that I could submit an appeal to reopen my case. I fax my appeal on Aug. 12 (not knowing that there was a time limit of 10 days). I called the court on Aug. 15 and was told the judge was not in Aug.

17-19. I called on the 19th and was told to call back on the 22. When I called back on the 22, I was told my request was denied. I am appealing on the very last day that I can, again, unaware of the time limit to do so.

The reason I requested the continuances were due to my dire financial situation and due to the distance being unable to apply for a public defender. I have done my best to be in communication with the court each time. I needed this continuance as I am finally in a position to secure legal representation, especially after realizing the system is set up in a way that you have to have a lawyer to work through the system of timed deadlines, submitted materials, etc.

I now request that my case be reopened so I can not only defend myself in court but finally get this matter resolved. I know my ignorance is not an excuse but I am hoping the court will give me the benefit of the doubt.

Another example of McCann's case-controlling and manipulation ("railroad"-style dictatorship). Why is it okay for him to take & hear another judge's motions when they aren't around, but they not hear his? Also, why are clerk(s) seemingly supporting his actions? \*Please see note at top

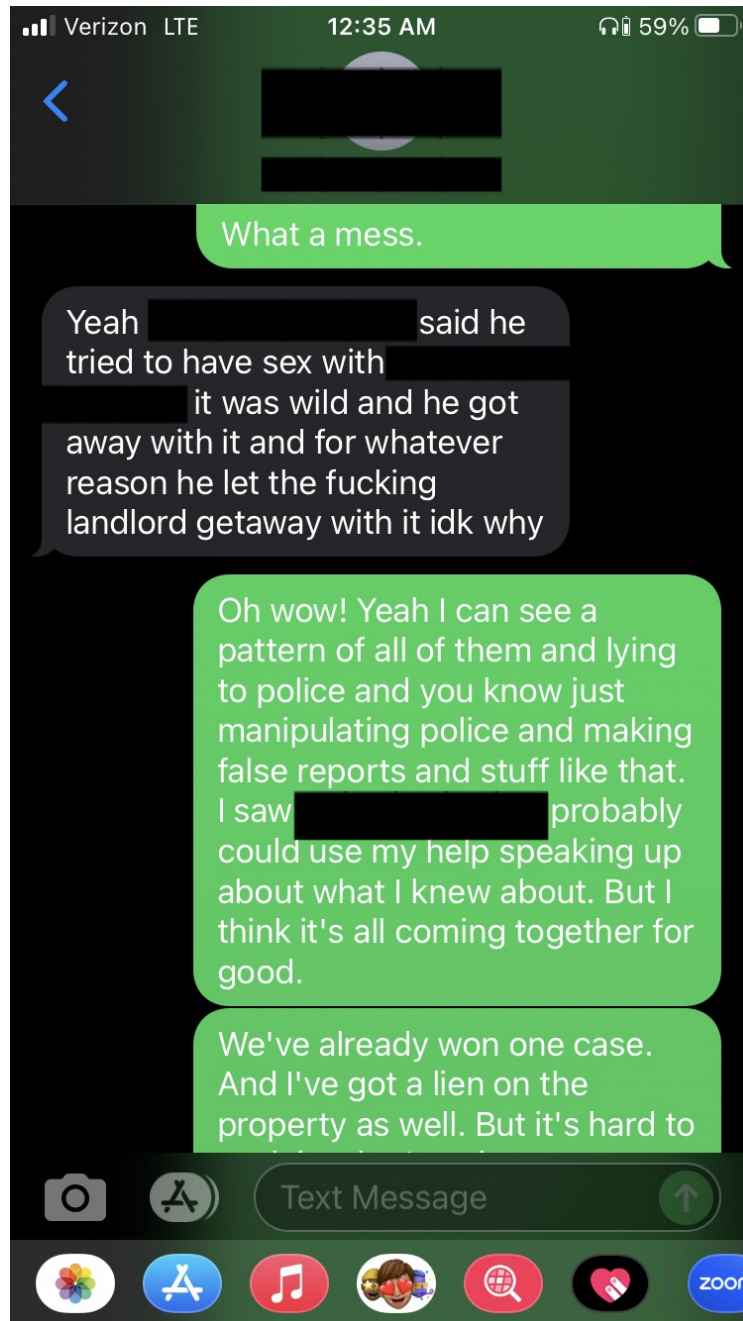
Sept. 1, 2022



Ybarra states she is not able to apply for a public defender because of distance (in-person requirement). Therefore, I believe Chayban should be proven as having applied in-person. I believe these people need to stop supporting other wealthy, corrupt individuals and stop using our systems to make things even more unfair for the poor.

**EXHIBIT 18**

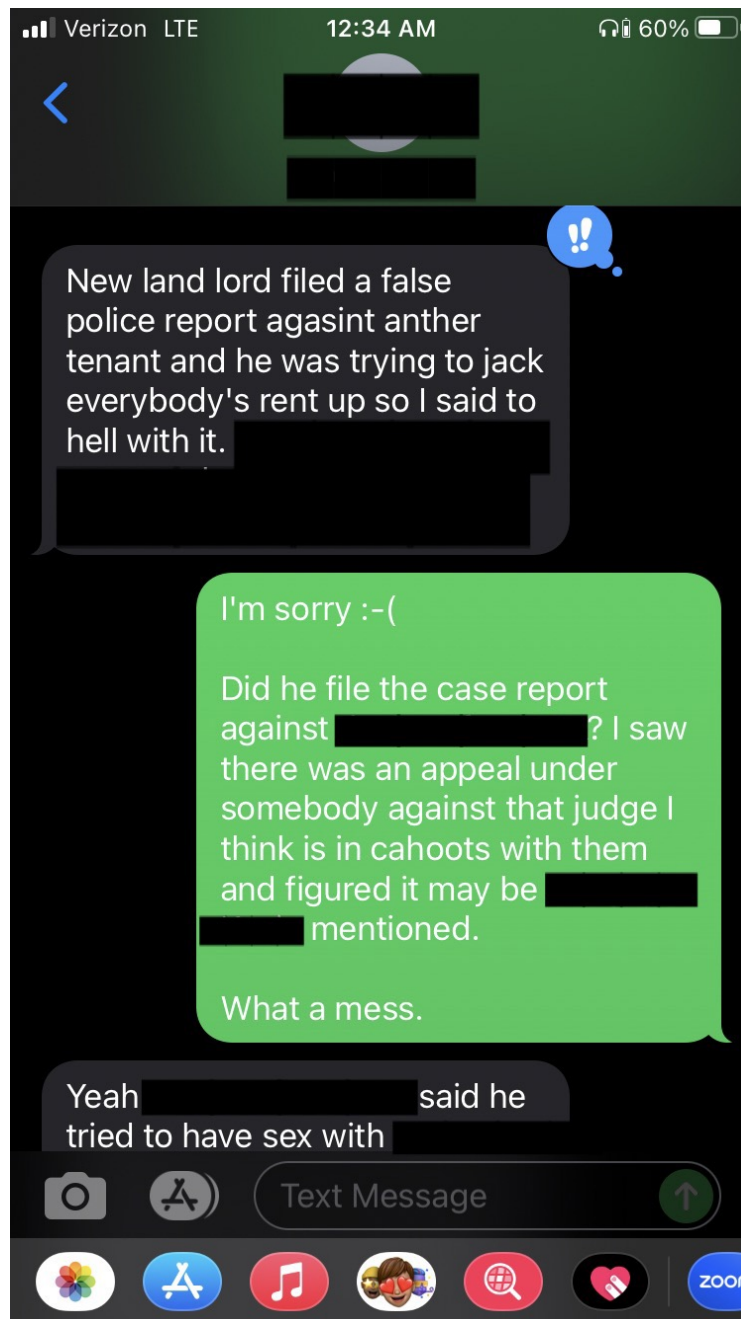
AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE  
FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



Witness and victim names were redacted for other purposes, but I have the original screenshots. This is a 4th witness/victim talking besides the other 3 that are obscured in the transcript. The person is referring to Chayban's cohort, realtor Michael Beavers. We are having a conversation about 324 Howle Avenue criminal activity involving Mccann. When the witness says, "he let the f---ing landlord," the witness means Mccann allowed Beavers to get away with attempted rape.

**EXHIBIT 19**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



Same witness as Exhibit 19. New land lord = Chayban middleman and cohort Michael Beavers. I can't recall what was redacted after "h— with it," but it probably includes someone's personal identifiers, and I have the original screenshot. Third redaction is a victim and the 4th, I believe, a witness I mentioned. In my opinion and experience, these folks are in the habit of making false reports and are supported by a person I believe to be a corrupt judge who manipulates police into wrong action or inaction.

**EXHIBIT 20**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM

enjoylivingabroad.com — Private

**FRANCIS X. MCCANN**

1/16/2015 03:52:36 pm

Airbnb is not what it is not all you might think it is for good American cities.....ask San Francisco or New York City or my own wonderful city of Charleston South Carolina where I have been Chairman the Planning and Zoning Commission for the past 26 years. We have outlawed this and similar uses in our city for good reason. it is illegal to rent for less then 30 days. read the recent article in New York Magazine "the Dumbest Person in Your Building Is Passing Out Keys to Your Front Door"

It ruins housing stock, drives down property values, creates transient use of rental property, drives off middle income and young workers, and is ruinous to long term stability of good city life.

Karen, and cousin Richard.....stay in a hotel.....or rent an apartment for a month.

cousin Frank

REPLY

Mccann admitted online in 2015 that he knows STRs under 30 days are illegal in Charleston County. Therefore, he knew or should have known that Section 27-40-770 applied relative to the illegal action against my son whose appeal specifically cited the violation, as well as in the Castagnetti appeal (which included, but didn't formally cite a violation of Section 27-40-770), which occurred after my son had given Mccann written notice of the 30-day requirement. If stays below monthly stays are legally not allowed, then all tenants should always have 30 day notices in Charleston County according to the law.

**EXHIBIT 21**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE  
FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM

reason or his malfeasance in office or abuse of his discretion. He shall, in addition to the oath of office now prescribed by Section 26, of Article III, of the Constitution, take the following oath (or affirmation) to wit: "I further solemnly swear (or affirm) that during my term of office as county deputy, I will study the act prescribing my duties, will be alert and vigilant to enforce the criminal laws of the State and to detect and bring to punishment every violator of them, will conduct myself at all times with due consideration to all persons and will not be influenced in any matter on account of personal bias or prejudice. So help me, God." The form of such bond shall be approved by the county attorney and, with the oaths, shall be filed with and kept by the clerk of court for the county.

A blanket bond may be used in any county to fulfill the bond requirement of this section upon approval of the County Council and the **County Attorney**.

HISTORY: 1962 Code Section 53-77; 1952 Code Section 53-77; 1942 Code Sections 3488, 3494; 1932 Code Sections 3488, 3494; Civ. C. '22 Sections 2033, 2039; Civ. C. '12 Section 1147; Civ. C. '02 Section 831; G. S. 654; R. S. 714; 1870 (14) 332; 1880 (17) 4; 1912 (27) 865; 1981 Act No. 105, Section 1. **NOTE\*: It appears police are at least somewhat beholden to or under authority of the county attorney, besides just being represented by such an official, indicating further conflict relative to Dahlheim's participation or alleged participation as a "prosecutor."**

One of many screenshots wherein I tried to learn about all this. It appears to me that, since Dahlheim reps police and they have a financial interest with her as in items like the above anyway, that she shouldn't be involved in any cases wherein citizens may have complaints against police. That includes our situation wherein police didn't always act against ISIS because of, I believe, bad advice from Mccann (I believe he convinced them not to act on terrorist attacks because they were part of a "civil matter," aka the illegal eviction Judge Beck disagreed with) or in the Giles appeal wherein Dahlheim participated and it appeared to me that Giles may have believed he had been wronged by police. That's why he wanted his case heard, from my perspective. Whether or not we or anyone else pursued claims based on perceived wrongs, I view Dahlheim's participation in both of those matters as strategic, liability-limiting conflicts-of-interest in favor of officials against which we may have claims. I believe that's unfair to us.

## **EXHIBIT 22**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM

SCCA/720 (Amended 8/1/2011)

**NOTE: Charleston "County Attorney" Dalheim is NOT a prosecutor. Dalheim's name also misspelled in appeal docket indexing for this case, which included Francis X. Mccann & named a 2nd county attorney allegedly representing Dalheim in appeal.**

Page 3 of 40

The Defendant did not receive said due process when the State(s) dismissed the tickets and thus the case against the wishes of the Defendant. The Defendant did meet with the Prosecutor:

Katherine Dahlhim  
615 Riverland Drive  
Charleston, SC 29412  
Tel: (843) 795-1140

←  
**James Island Magistrate Court,  
where Judge Francis X. Mccann  
works**

whereas the Defendant did inform the Prosecutor Katherine Dahlhim that certain issues presented in the case required Federal Court Attention. The Defendant made it clear that the following issues had to be addressed Defendant that she "Saw the case as simple violations of traffic law and that since I (the Defendant) did have the appropriate tags and license, she would drop the charges and dismiss the tickets." The Defendant then did inform the Prosecutor, Katherine Dahlhim, that the Defendant wanted the Subject matter Jurisdictional challenge heard in a Federal Court setting - where it properly belonged. The Defendant also informed the Prosecutor that Supreme Court Case Laws were present and active. Again, only a Federal Court can hear those issues. The Defendant discussed the following:

Subject matter Jurisdiction confliction:

The Federal definition of Motor Vehicle conflicts with the State(s)'s Definition of Motor Vehicle.

Title 56 - Motor Vehicle

**SECTION 56-1-10. Definitions.**

**(7) "Motor vehicle" means every vehicle which is self-propelled and every vehicle which is propelled by electric power obtained from overhead trolley wires but not operated upon rails**

(1) "Driver" means every person who drives or is in actual physical control of a vehicle;

SCCA/720 (Amended 8/1/2011)

Page 4 of 40

Comes into conflict with:

U.S. Code > Title 18 > Part I > Chapter 2 > § 31  
18 U.S. Code § 31 - Definitions

I made the top pink note while upset. I have no idea if Dahlheim is legally allowed to play prosecutor, but I don't believe she should be legally allowed to be that or be a solicitor based on the job description of the solicitor that I read. If she's the County Attorney who represents and defends officials, then that's all she needs to be doing, in my opinion and belief. She also was a participant in other recent area actions wherein I told a local drunk driver to stop, he defied me, and then got arrested for drunk driving and got off the charges with participation by Dahlheim and Mccann. I'll bet he's still drunk driving. It's my opinion that these folks are undermining a reasonable sense of safety and justice for the good people of the area. SEE EXHIBIT 11.

**EXHIBIT 23**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE  
FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM

No he never gave me a 30 day  
it was a 10 day

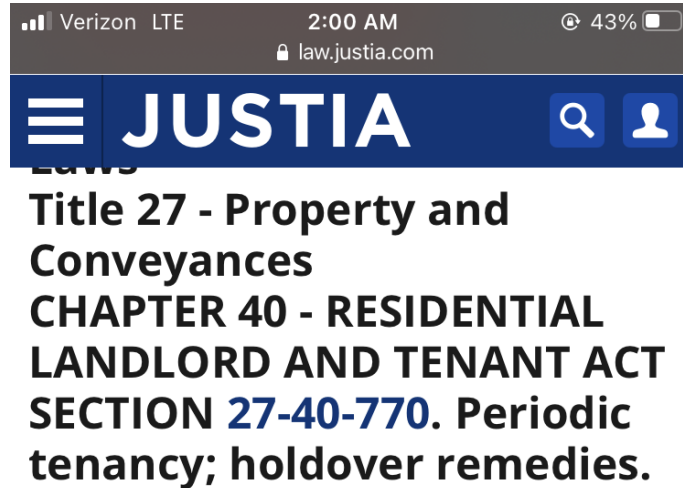
No he never gave me a 30 day  
it was a 10 day

Hey, thanks for responding.  
Thank you.

I believe I ought to have been paid for this investigation following Mccann's intentional wrongdoing.

This is another person stating that they didn't receive a 30-day notice when being evicted from 324 Howle Avenue after my son provided Mccann with the law in the following Exhibit.

**EXHIBIT 24**



**Universal Citation:** [SC Code § 27-40-770](#)  
(2013)

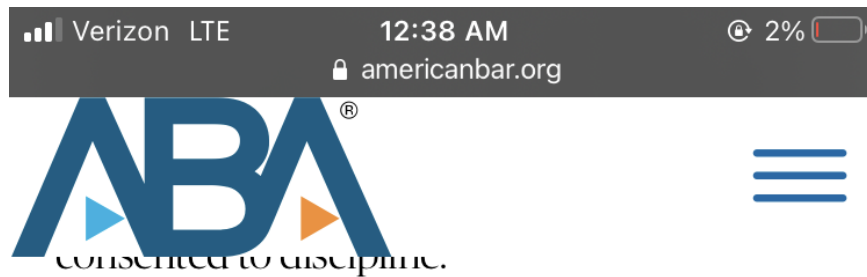
(a) The landlord or the tenant may terminate a week-to-week tenancy by a written notice given to the other at least seven days before the termination date specified in the notice.

(b) The landlord or the tenant may terminate a month-to-month tenancy by a written notice given to the other at least thirty days before the termination date specified in the notice.

(c) If the tenant remains in possession without the landlord's consent after expiration of the term of the rental agreement or its

Cause listed on my son's 2021 eviction appeal attempt (couldn't afford fees, received no relief when he was criminally victimized and no assistance with financial forms because corrupt people were blocking my son's assistance, which affected me and still affects me today). As you see in the prior Exhibit, Mccann did not begin obeying this law just because we told him about it. It appears to me that he kept doing the same to others instead and also refused to review others' evidence, besides commandeering a criminal case wherein we were victimized and, I believe, trying to ruin us.

**EXHIBIT 25**



### III. Rule 8.3(a) and the Duty to Report

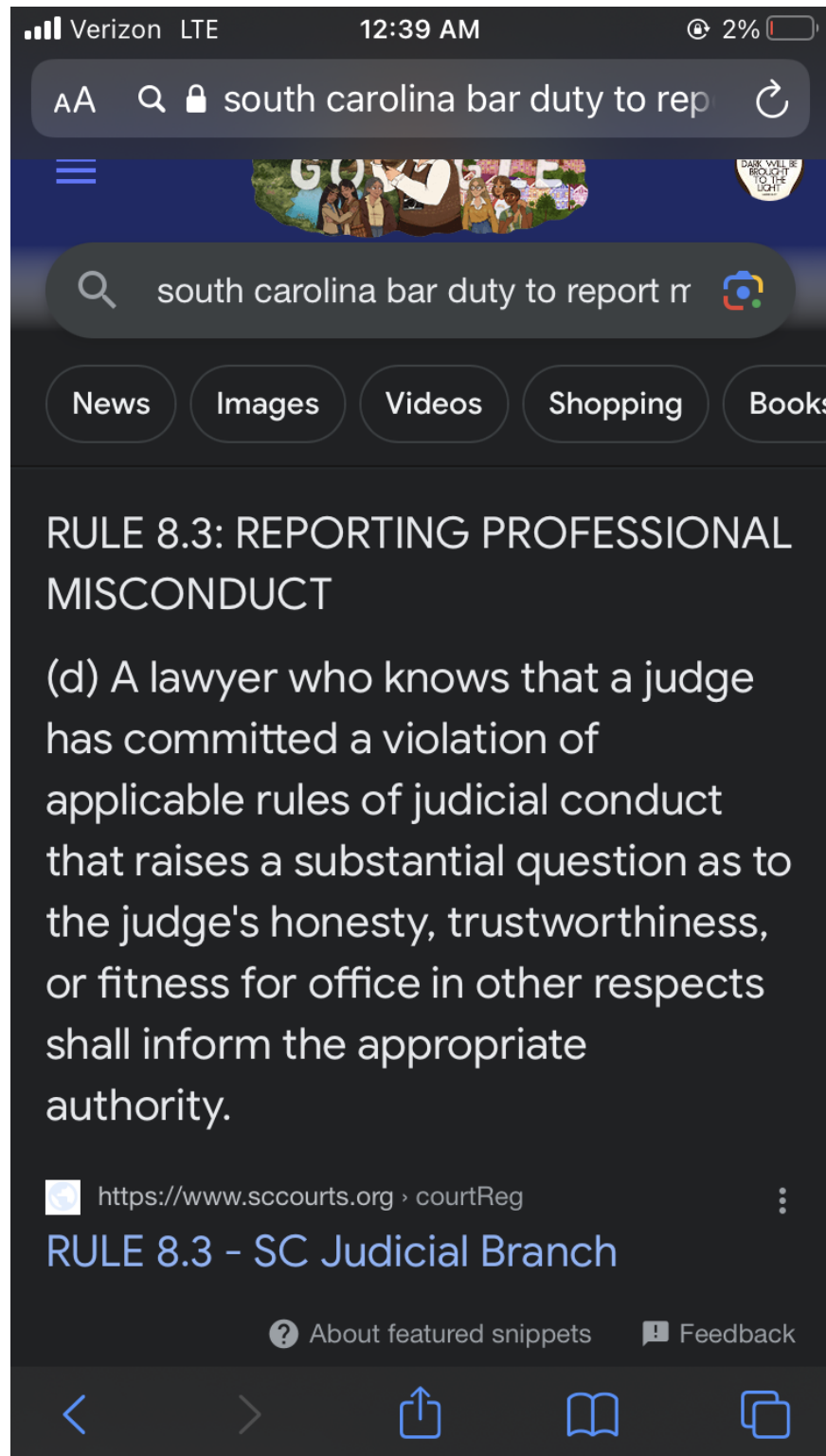
In most jurisdictions, lawyers are required to report misconduct by other lawyers, and may be disciplined if they fail to do so. Model Rule 8.3(a) states that a “lawyer who knows that another lawyer has committed a violation of the Rules of Professional Conduct that raises a substantial question as to that lawyer’s honesty, trustworthiness or fitness as a lawyer in other respects, shall inform the appropriate professional authority.”<sup>43</sup> This language essentially tracks the “honesty, trustworthiness or fitness as a lawyer” verbiage used in Model Rule 8.4(b).

#### A. Reporting Another Lawyer

Lawyers who are aware of another lawyer's  
If an offense may wonder if they are required



AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



**EXHIBIT 27**


AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE  
FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM

The screenshot shows a search interface with a dark background. At the top, there are five filter buttons: 'News', 'Images', 'Books', 'Shopping', and 'Videos'. Below the filters, the search results are displayed. The first result is 'What is the American Bar Association Model Rule 8.4 G?' with an upward arrow on the right. The snippet for this result reads: '(g) engage in conduct that the lawyer knows or reasonably should know is harassment or discrimination on the basis of race, sex, religion, national origin, ethnicity, disability, age, sexual orientation, gender identity, marital status or socioeconomic status in conduct related to the practice of law.' Below the snippet is a small ABA logo and a truncated URL: 'https://www.americanbar.org › rule...'. Underneath the URL is the title 'Rule 8.4: Misconduct - American Bar Association'. Below this result is a section titled 'MORE RESULTS' in all caps. Underneath this section are three more search results, each with a downward arrow on the right: 'What is the American Bar Association Rule of professional Conduct Canon 7?', 'What are four types of judicial misconduct?', and 'What are the duties of the American Bar Association?'.

News Images Books Shopping Videos

What is the American Bar Association Model Rule 8.4 G? ^

(g) engage in conduct that the lawyer knows or reasonably should know is harassment or discrimination on the basis of race, sex, religion, national origin, ethnicity, disability, age, sexual orientation, gender identity, marital status or socioeconomic status in conduct related to the practice of law.

 <https://www.americanbar.org> › rule...

Rule 8.4: Misconduct - American Bar Association


**MORE RESULTS**

What is the American Bar Association Rule of professional Conduct Canon 7? v

What are four types of judicial misconduct? v

What are the duties of the American Bar Association? v

**EXHIBIT 28**

What is Canon 22 of the Canons of Professional Ethics? 

Canon 22.

**The conduct of the lawyer before the Court and with other lawyers should be characterized by candor and fairness.** Feb 28, 2012



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

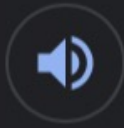
**CANONS OF PROFESSIONAL ETHICS**

**EXHIBIT 29**

# Dictionary

Definitions from [Oxford Languages](#) · [Learn more](#)

Search for a word



can·dor

/ˈkændər/

*noun*

the quality of being open and honest in expression;  
frankness.

"a man of refreshing candor"

**Similar:**

frankness

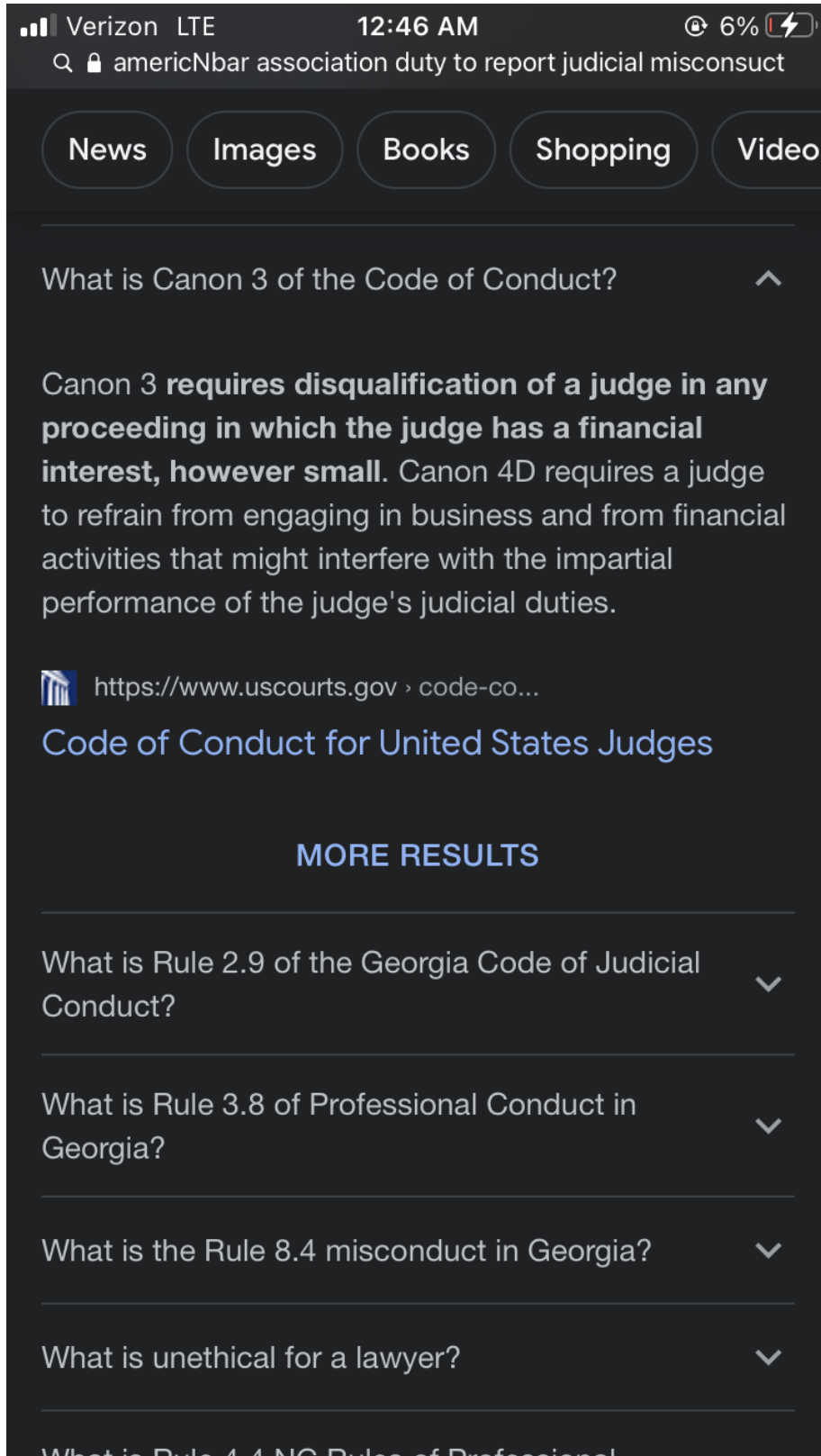
openness

honesty



**EXHIBIT 30**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



**EXHIBIT 31**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM

The screenshot shows a mobile browser interface for allbiz.com. At the top, it says "allbiz.com — Private". Below that is a navigation bar with a back arrow and "Ads by Google". There are two buttons: "Send feedback" and "Why this ad?". Below the navigation bar is a scroll indicator. The main content area contains two questions, each in a green box:

**Q5**

**Are there other contacts associated with Charleston County Finance Department?**

We have 9 additional contact(s) for Charleston County Finance Department. They include: [Onteeru Madhu](#), [Dawson Joseph](#), [Other Chip Hlavacek](#), [Manager Carla Ritter](#), [Administrator Keith Bustraan](#), [Don Mc Nely](#), [J. Steven Dykes](#), [Katherine J. Dahlheim](#) & [Austin Adams Bruner](#).

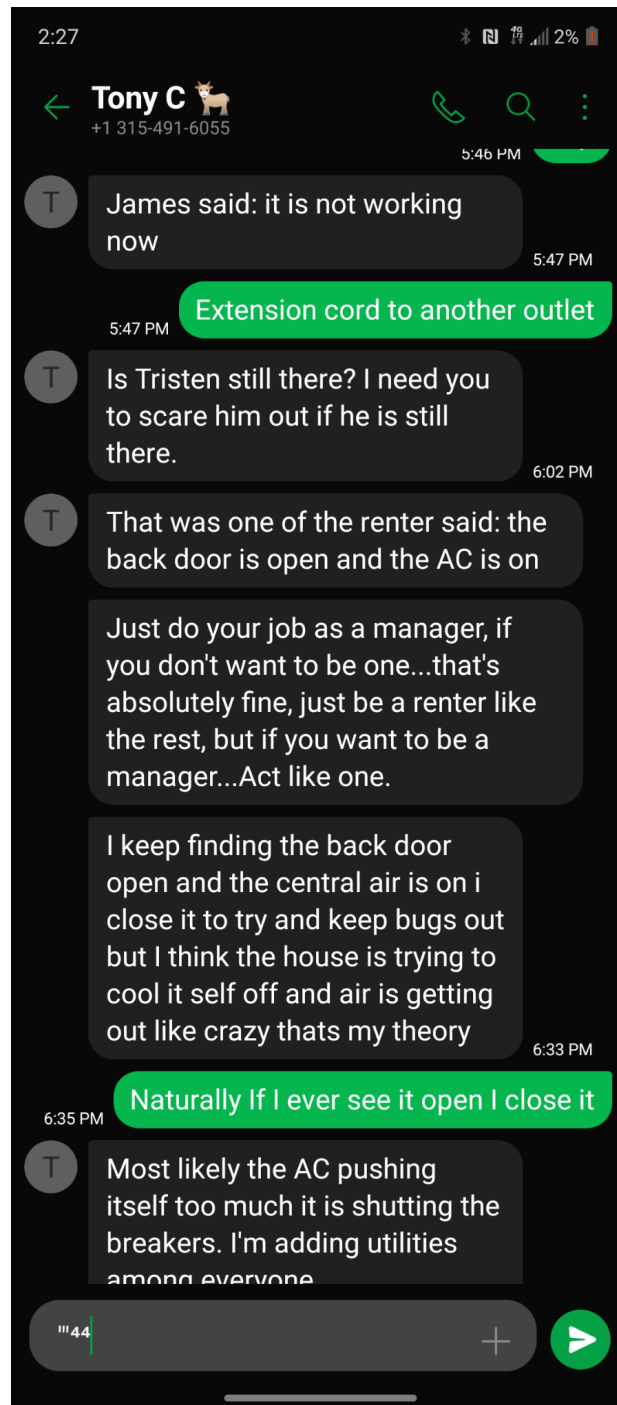
**Q6**

**What is the web address (URL) for Charleston County Finance Department?**

Public records I found listing Dahleim as being associated with Charleston County Finance Department, making these matters surrounding conflicts-of-interest even more disturbing to me. If one searches Dahleim's participation, what one will largely discover are actions securing and/or seizing money and/or property in favor of Charleston County Police (essentially representing the County's financial interests, which, I believe, is obviously prohibitive of certain participation in any action wherein wrongdoing is alleged or suspected on the part of any official from the County, and particularly in those cases wherein parties have already claimed wrongdoing by any official in a documented way).

**EXHIBIT 32**

AMENDED EXHIBITS FOR JUDICIAL REPORTS AGAINST JAMES ISLAND MAGISTRATE JUDGE FRANCIS X. MCCANN IN COMBO WITH COUNTY ATTORNEY KATHERINE DAHLHEIM



This is a screenshot that was provided to my son, the victim, by a violent felon whom Chayban had then hired as “manager” of 324 Howle Avenue. The individual was elicited by a self-professed ISIS terrorist to terrorize my son on or about March of 2021 in illegal eviction efforts after my son made complaints to the homeowner. The civil action referenced was filed after these efforts failed despite what I believe, Mccann’s, Chayban’s, and possibly others’ attempts to dissuade police from taking action on most terroristic incidents and terrorist attacks against my son over the course of several 2021 months.

**EXHIBIT 33**

## EXHIBIT LIST

RE: CASE # \_\_\_\_\_

EXHIBIT	DATE	DESCRIPTION	# OF PAGES
1.	6/18/2021	Audio recording documenting Mercedes claims	N/A
2.	4//28/2021	Turky's Towing Receipt	1
3.	5/23/2021	Mercedes tire repair receipt	1
4.	10/7/2021	Collections efforts upon Matthew Roux via text message	1
5.	2021-2022	Collections efforts upon Matthew Roux via text message	1
6.	10/23/2020	Outreach partnership text	1
7.	3/2021	Conspiracy text transcript relative to video EXHIBIT 35	1
8.	6/25/2023	Mercedes tax record	1
9.	2/17/2022	Text transcript from storage with "Clyde"	1
10.	2/16/2022	Text transcript from storage with "Clyde"	1
11.	2/15/2022	Text transcript from storage with "Clyde"	1
12.	2/1-2/2/2022	Text transcript from storage with "Clyde"	1
13.	2/3/2022	Text transcript from storage with "Clyde"	1
14.	2/1/2022	Text transcript from storage with "Clyde"	1
15.	1/30/2022	Text transcript from storage with "Clyde"	1
16.	2023	Mercedes tax record	1
17.	10/13/2022	Son forfeiting interest in Mercedes/no title	1
18.	2022	Warning Matthew Roux, collection attempts	1
19.	2022	Warning Matthew Roux	1
20.	2022	Treason Law sent to Roux, attempts to extract Roux from ISIS	1
21.	2022	Definition of "adhere," penalty for treason ("death")	1
22.	2022	Definitions of "terrorism" and "undermine"	1
23.	2022	Son forfeiting interest in Mercedes	1
24.	7/1/2021	1 of several available evidences of Chayban breaking into Nesbitt's room	1
25.	2022	Limited material support laws	1
26.	2022	Collection efforts, efforts to extract Roux from ISIS, Ps. 105:15	1
27.	5/18/2023	Mercedes Kelly Blue Book Information	1
28.	2023	Mercedes Kelly Blue Book Information	1
29.	10/26/2022	Son forfeiting interest	1
30.	2023	SC Section 56-5-5670 (E)(6)	1
31.	2023	Definition of oppression	1
32.	2023	Ezekiel 3:19	1
33.	5/27/2021	Video recorded ISIS terrorist threats	N/A
34.	6/16/2021	Video of Mercedes in 2021	N/A
35.	5/2021	Video with conspiracy and Mercedes purchase discussions	N/A
36.	N/A	Genesis 1:23	1
37.	8/2022	Telephone bill documenting Griffith's 8/15/22 call to LKQ RE: scrapping	1
38.	12/13/2021	Attempted rape text message	1
39.	12/13/2021	Attempted rape text message	1

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF CHARLESTON )  
 )  
 )  
 )  
MARY A. GRIFFITH )  
 )  
 ) *PLAINTIFF* )  
 )  
 )  
LKQ CORPORATION )  
 )  
 ) *DEFENDANT* )  
 )

IN THE MAGISTRATE’S COURT

**MOTION FOR SUMMARY  
 JUDGMENT**

\_\_\_\_\_  
 CIVIL CASE #

COMES NOW the Plaintiff, Mary A. Griffith, and respectfully moves for summary judgment of \$7,129.40 against LKQ Corporation in Plaintiff’s favor based upon the following facts laid out to request this Honorable Court relieve me of additional oppression arising from my ongoing participation herein. My family has been targeted by an ISIS group since 2021, with some participants having participated against us since 2019 and merged with ISIS based on their commonality.

We have already lost so much because of this group. My son nearly died in 2022. I’ve needed my vehicle this whole time. “This whole time” means since August of 2022, when LKQ acquired it (**EXHIBITS 17, 23, and 37**) and thereafter, proceeded against me in its continued possession and destruction of my Mercedes-Benz.

I had already been through Hades on earth (only minimally demonstrated by **EXHIBITS 1-5, 9-15, 18, 19, 26, 38, and 39**) over that 2004 Mercedes-Benz by the time it was “scrapped” by my unwitting adult son in August of 2022.

I believe my son was given the wrong advice about the legal disposal process, including wrong advice about any liability that may have existed for him personally. The circumstances were extenuating, the title was distressed as well as absent, and LKQ still told me, “No,” *twice* — even after I informed it at least once about the ISIS terrorism, which causes psychological and other health damage, aside from any bodily injury, and especially in currently-targeted victims. My son was acting on LKQ’s advice and not thinking for himself because he was being terrorized, as I told LKQ back in 2022.

There should be no further contention as to the 2021 and 2022 sellers, Roux and Nesbitt respectively, individually forfeiting any claims against the vehicle at the times of their respective, individual surrenderings of the physical property, each to a person or entity they each viewed as the Mercedes’ “buyer” in 2021 and 2022. Additional demonstrations of each forfeiture are made in my lawsuit.

I don't believe LKQ should have accepted the Mercedes without a title (**EXHIBIT 23**) under §56-19-210, §56-19-480 (A), or §56-5-5770 (B)(1), nor scrapped or disposed of the Mercedes without offering me a redemption opportunity under §56-5-5670 (E)(4) and (E)(6) during either of the 2 timely occasions I made it aware of my interest in 2022 (**EXHIBIT 37**), occasions wherein LKQ was given a brief summary of our family's circumstances in the pleading of my initial case for urgent remedy directly to LKQ.

LKQ offered me no redemptive and/or other remedial restorative remedy for the recovery of the vehicle or my twice-stated (**EXHIBIT 37**) interest in such a vehicle, proceeding against me in continuing to materially possess my vehicle and proceeding with the intentional destruction of my claimed property, despite my 2022 statements of claim to LKQ, and despite the "at least" 3-business-day destruction waiting periods described in §56-5-5670 (E)(6) and similar Sections.

While my family should have never been in the 2022 position of contemplating or shouldering these kinds of losses relative to a scrapped car in the first place, the legal fact is that LKQ chose to purchase the vehicle without a title according to my interpretations of §56-19-210, §56-19-480 (A) and §56-5-5670 (B)(1), and thereafter refused me remedy in what I believe was a violation of §56-5-5670 (E)(6), which has caused me losses and distress.

It is not my fault that this issue went unresolved during and after my multiple attempts to solve the problem with LKQ in 2022 (**EXHIBIT 37**) by my interpretations of §56-5-5670 (E)(4) and (E)(6), nor that my added expenses accrued into 2023 because of burdens to me thereafter on account of LKQ's earlier actions against me at the time it acquired the physical vehicle in North Charleston, South Carolina in 2022.

It is not my fault that LKQ accepted and/or destroyed my vehicle after ignoring my claims in August of 2022 after, I believe, the vehicle had already technically been stolen from me personally by a prior seller who is documented to have demonstrated ISIS allegiance (**EXHIBIT 33** witness with no reports thereafter and movement with the terrorist) — a thief who already owed a debt to me (minimally **EXHIBITS 1-3, 9-15**) when LKQ acquired the vehicle without a title from my unwitting adult son in 2022 (**EXHIBIT 23**), depriving me of the possession and use of my vehicle once again.

LKQ forfeited any perceived interest in the vehicle in 2022 when, I believe, it misled me and refused me any immediate remedy, despite my stated interest, in an act that I believe technically constituted "conversion," and into 2023 when it proceeded with business as usual with zero concern for my welfare, safety, interests, or well-being following its **EXHIBIT 37** refusals.

I wasn't in a place of instituting complicated legal processes at the time because, as you can see, I was being terrorized by community miscreants, including but not limited to Matthew Roux —

technically ISIS gang members by my contemplation of our laws, all because I managed to jump through the hoops necessary to make valid reports and claims against a greedy ISIS terrorist while still being constantly terrorized.

Folks who have their own issues and don't have money or education to fight a company like LKQ on any of its systematic denials of any other claims like mine in 2022 shouldn't have to be terrorized — or worse — because a Fortune 500 company didn't, by my interpretation of such, minimally abide by the law in ensuring there were no claims (**EXHIBIT 37**) against a vehicle prior to destroying it in order to make itself a little more money.

I believe a single, prompt verbal notification ought to have been enough to give LKQ pause about continuing to possess or destroy its recently-acquired vehicle with an absent/distressed title/registration in a 2022 situation wherein it is likely their acquisition required a waiver whose legal criteria were, I believe, unmet. It is unfair, unreasonable, and oppressive to make me, or anyone else, go to these kinds of lengths just to get LKQ to do what I believe would have been the right (and legal) thing to do all along.

I believe I am the only party, as of minimally August of 2022, demonstrating any legal right to own and possess the Mercedes and/or to be identified on any of its written collateral — especially considering my son's repeated forfeitures in August of 2022 and continually thereafter.

However, since the Mercedes has likely been destroyed and/or isn't in the same "good" condition as it was in 2022, I'm requesting a replacement and my attached costs or my total attached costs.

There is no underlying dispute as to this case's material facts, which demonstrate my right to own and possess the Mercedes and/or its collateral as of minimally 2023. I believe attached cost assessments are fair and reasonable given the circumstances demonstrated in my lawsuit and its evidence. I believe that I should therefore be immediately paid by the Defendant in the interest of relieving me of further oppression, obstruction, or loss.

I pray this Honorable Court grants me summary judgment against LKQ Corporation, awarding me \$7,129.40 to be satisfied immediately, in light of Plaintiff's circumstances and Defendant's vastly superior resources, and/or within a timeframe this Honorable Court finds most suitable, by the Defendant, LKQ Corporation.

Respectfully,

Mary A. Griffith

STATE OF SOUTH CAROLINA	)	
	)	IN THE MAGISTRATE’S COURT
COUNTY OF CHARLESTON	)	
	)	
<u>MARY A. GRIFFITH</u>	)	
<i>PLAINTIFF</i>	)	<b>COMPLAINT</b>
	)	
<u>LKQ CORPORATION</u>	)	
<i>DEFENDANT</i>	)	_____
	)	<b>CIVIL CASE #</b>
	)	

COMES NOW Plaintiff Mary A. Griffith seeking urgent relief, plus costs, surrounding a 100% interest in a silver 2004 Mercedes C-class wagon that my grown son, Tristen Nesbitt, the then co-owner, “scrapped” on or about August of 2022 with LKQ “Pick Your Part” in North Charleston, South Carolina, plus expenses.

I’m a prophetically-confirmed “end times” messenger for God to the Body of Christ (people who practice the Christian religion) at Morningstar Ministries in Fort Mill, South Carolina. I’ve mentioned this because such a designation isn’t an everyday event. My point is that I’ve had other things to do (spiritual careers and other tasks including, but not limited to, this mention) besides composing this lawsuit after, I believe, LKQ Corporation (“LKQ,” “Defendant”) wronged me in 2022 by continuing to possess and destroy a vehicle in which I’d made repeated claims of interest.

The above-referenced silver-colored 2004 Mercedes Benz C-class (c 240 4-door 4MATIC wagon), Charleston County Parcel Number MV2000115683, Alternate Number 1167383, Serial Number listed as “\*\*\*\*\*2656,” (I never copied down the entire the VIN number because I didn’t expect this to happen), Year “2004,” Model “MERZ,” Model “C,” as described and characterized by **EXHIBITS 8, 16, and 34**, or the sole motor vehicle discussed in this case unless or until another vehicle meeting another description arises, will hereinafter be referred to as “Mercedes,” “Mercedes-Benz,” “Mercedes C-class,” “2004 Mercedes,” “car,” “vehicle,” “property,” etc.

While publicly-available information (Google) seems to commonly describe LKQ as a company that purchases “wrecked” vehicles and sells the vehicle parts thereafter, my Mercedes was neither wrecked nor inoperable at the time of its illegal and unwitting 2022 disposal by my grown son.

The Mercedes was my then-23-year old son’s first car ever, bought with cash in installment payments of \$1,500.00 (or greater) while working at Hall’s Chophouse in 2021 (a job he lost because of transportation issues surrounding ISIS terrorism).

The Mercedes was “scrapped” in 2022 at LKQ “Pick Your Part” at 4646 Rivers Avenue, North Charleston, South Carolina 29405 without a title.

I informed LKQ of my interest in the title-less and I believe, converted, vehicle immediately (within 24 hours) upon my unwitting son’s “scrapping” of it on or about August of 2022, but was offered no remedy.

The physical vehicle is shown in the 2021 video of **EXHIBIT 34**.

On or about the 1st quarter of 2021, I was told by my son that \$1,300.00, and not \$1,500.00 as was eventually satisfied, was the agreed-upon total cost to purchase the 2004 Mercedes he planned to purchase. I believe my grown son was distracted by Roux’s (the seller’s) and other terroristic activity (**EXHIBITS 1, 7, 33, and much more**) at my son’s then-residence located at 324 Howle Avenue, Charleston, SC 29412, eventually paying Roux more money than was due, on top of my documented contributions.

I believe installment payments totaling at least \$1,500.00 were paid in full by my son to Roux by on or about April of 2021, at which time I personally began footing the bills (**EXHIBITS 2 and 3**) for services, storage, repairs, and other expenses relative to the fully-purchased 2004 Mercedes beginning on or about April of 2021.

Matthew (“Matt”) Roux was a fellow tenant at a shared living environment who was brought to the home in 2020 while wearing a government-mandated ankle monitor by a landlord who ended up (literally) being a greedy ISIS terrorist (**EXHIBIT 33**). No tenant approved Roux’s presence at 324 Howle Avenue, Charleston, SC 29412, but my son tried to make the best of an awful housing situation by getting a good deal on his first car.

Following my son’s completed car purchase, Roux continually refused to provide my son or me (**EXHIBITS 4, 5, 18, 19, and 26**, and many more such incidents) with the necessary documentation to legally obtain the Mercedes’ South Carolina title or registration.

Manipulated by Roux, my son had clearly believed in early 2021 that Roux was his friend and/or ally. At around 20 years my son’s senior, though, I believe ex-con Matthew Roux, the Mercedes seller, took advantage of and manipulated my grown son’s good nature.

I believe the environmental hysteria at 324 Howle Avenue created by the ISIS terrorist homeowner to whom Roux has now demonstrated a clear allegiance created an easier time (within the 1st and 2nd quarters of 2021) presented an ideal atmosphere for ex-con Matthew Roux to take advantage of my busy, terrorized, and exhausted grown son.

The 40+-year-old 2021 seller, ex-con Matthew Roux, took advantage of us both, depriving us of the legal use of the vehicle from on or about April of 2021 until, technically, present day 2023.

In April of 2021, my ex-husband and I were forced to resolve Mercedes storage, towing, and repair issues financially and materially because of a 2021 illegal and unauthorized “joyride” taken in the Mercedes by Roux without my son’s permission or consent (**EXHIBITS 1** [“tow truck due” comment references 4/21/2021 incident], **2, and 3**). These were “extra” expenses we paid specifically because it was understood by all parties that the car “now belonged to my grown son.”

Roux duped us and ran off with a man, Tony Chayban, Roux knew (**EXHIBIT 33**) was in ISIS.

Obviously, neither of us would have paid approximately double the amount shown here on the Turkey’s Towing receipt of **EXHIBIT 2** just for the towing company’s storage of the Mercedes because of Roux’s illegal April 2021 joyride, nor ever towed or repaired a vehicle we believed my grown son would never be able to title or use.

My son was hospitalized around a dozen times and almost died over on or about winter of 2021 and first quarter of 2022 following a retaliatory onslaught of illegal and terroristic activity upon our family by Roux and other ISIS affiliates, allies, and sympathizers.

Mercedes storage supervised and facilitated by me commenced on or about the 4th quarter of 2021 (**EXHIBITS 9-15**) because of the intentional, dangerous problems Roux and his ISIS gang were still causing for my grown son and me.

Roux refused us both any receipt or means of obtaining a legal title throughout 2021 and 2022 (**EXHIBITS 4, 5, 18, 19, and 26**, and many more like incidents), since Roux had fled to California with an ISIS terrorist with intent to deprive my son of legal use of his rightful property until LKQ took possession of the physical vehicle, but technically lasting to present day in 2023.

#### AUGUST 2022 SCRAPPING SUMMARY

On or about 8/15/2022, I was notified of the unauthorized, unwitting sale of the 2004 Mercedes itself for “scrap,” without a title, by my grown son to LKQ in North Charleston, South Carolina.

After careful review of South Carolina law regarding vehicle sales and purchases, including those by “salvage yards,” I do not believe the 2022 sale of the Mercedes was legal. I cannot find any legal condition for sale which applied to any authorized sale of the Mercedes.

My son, who had been repeatedly hospitalized and nearly died over the prior year or so, "scrapped" the titleless vehicle in August of 2022 at LKQ "Pick Your Part" in North Charleston, SC, without first consulting me, despite a substantial interest I believed we both understood I personally held in the 2004 Mercedes C-class.

My son misunderstood, minimally relative to my interest. I do not believe LKQ properly advised my son when it authorized the 2022 sale/purchase whatsoever.

Following the disposal of the car, I contacted the Defendant as to my interest in the 2004 Mercedes (**EXHIBIT 37**). I believe LKQ misled me about my immediate and/or long-term legal or other remedies surrounding my claim of ownership of the recently-"scrapped" vehicle in August of 2022. The partial stated claim was made in 2022, not because I didn't invest enough or do enough work to document a full claim or right to immediately repossess the Mercedes from the Defendant, but because I was willing to share it with my son in light of his own prior investment and our family's egregious circumstances.

My grown son effectively surrendered his full interest in the car to me once I brought the mistake surrounding my security interest to his attention thereafter surrounding the scrapyards debacle. Furthermore, my son minimally demonstrated full waiver of his interest upon the previous, unauthorized sale/disposal to LKQ as discussed in **EXHIBITS 17, 23, and 29**.

LKQ surrendered any interest it may have perceived it had the vehicle by failing to offer me any right of redemption and, I believe, leading me astray as to my options (by participating in the acquisition of a vehicle with a missing title that seems, to me, like conversion, being made aware of my interest quickly and within a legally-mandated waiting period, as well as by failing to abide by my interpretations of minimally §56-19-210, §56-5-5670 (B)(1), (E)(1), (E)(4), (E)(6), and §56-19-480 (A) — and other Sections, specifically those several codes I saw which designate a 3-day waiting periods for what seemed like every vehicle acquisition in a "destruction" scenario .

I alone was making collections efforts on the vehicle just 9 days before it was scrapped without my authorization or knowledge at LKQ in 2022 — in combination with my statements to Roux about supporting or aligning with ISIS terrorism as he passively stole my vehicle. I incidentally know Roux was receiving my messages because he answered my telephone call one day from a different telephone number, but intentionally remained silent as the call connected.

There are legal circumstances surrounding the sale which entitle me to a full interest in the Mercedes which LKQ acquired in 2022, and in which I technically could have claimed a total interest in 2022 had I not been fleeing from ISIS terrorism without resources to document the

underlying lawsuit surrounding my son's 2021 acquisition and/or my own interests in the vehicle resulting from the 2021-2022 passive, intentional theft, conversion, and/or deprivation by Roux. I believe this scenario amounts, minimally, to my being entitled to a reasonable replacement of the vehicle LKQ deprived me of, plus expenses.

I don't believe I should have to be filing at all because of other people bothering, oppressing, robbing, and exploiting my family and me. The Defendant was informed of our circumstances in 2022 and thereafter specifically chose not to be more flexible or helpful, automatically invalidating my claims on 2 occasions within the 72-hour destruction waiting period.

My current sole interest in the Mercedes is supported by the financial, functional, and legal applications described above, and by those that follow.

#### 2021 AGREEMENT FOR SON'S PURCHASE, SATISFACTION OF AGREEMENT

On or about the spring of 2021, my grown son, Tristen Nesbitt, entered into a verbal agreement with then-fellow 324 Howle Avenue, Charleston, South Carolina tenant Matthew Roux to purchase Roux's 2004 Mercedes C-class.

My son was obviously naive to Roux's true nature, as well as trying to make the best of an awful housing situation by striking a deal on the Mercedes that would benefit our family by making payments on a vehicle Roux wasn't legally allowed to operate because of an ankle monitor, house arrest, and/or related obstructions relative to his driving privileges, seemingly due to prior criminal activity.

Homeowner Tony Chayban had previously utilized Roux's presence, along with Chayban's own continual threats to spread lies about me (ISIS requires dissemination of disinformation as a "duty of war") to force me out of my residence at 324 Howle Avenue illegally (menacing, stalking, standing outside my bedroom, essentially "terrorism") after tearing apart my Christian ministry in 2020 (**EXHIBIT 6**) following my failed attempts to persuade Chayban abide by the law and convert the premises into a Christian recovery ministry instead of earning his revenue through AirBnbs/short-term stays, which I later discovered are banned (illegal), minimally those with absentee homeowners (as he was), in Charleston County, South Carolina, anyway.

In 2021, when my son remained behind at 324 Howle Avenue once I had fled due to terrorism by Chayban, Roux convinced my grown son that the Mercedes was worth far more than the \$1,500.00 I believe my son minimally paid Matthew Roux in installments.

The vehicle was paid off as of on or about April of 2021, but Roux continued trying to manipulate my son out of more money, refusing the title and taking the car out illegally in April

of 2021 (**EXHIBITS 2 & 3**), causing me excessive expense.

Roux's 6/18/2021 **EXHIBIT 1** assertion about \$200.00 being owed by Nesbitt wasn't true. His ISIS partner, Tony Chayban, admitted as of on or about the prior month in **EXHIBIT 35** that the \$1,500.00 had been satisfied, and that's more than the \$1,300.00 total I believed I first heard my son tell me about during the first quarter of 2021 surrounding the parties' verbal agreement.

I believe Roux was manipulating my son. I do not believe my son was aware of the total amount he had overpaid Roux because of manipulation while Roux knew Nesbitt was being terrorized (**EXHIBITS 1, 33, 35**, and much more) by Tony Chayban, "Corey" Davis, and several other co-conspirators. My son was the Mercedes owner as of April of 2021.

In satisfying the purchase agreement, Nesbitt paid Roux in cash installments as-able until an amount meeting or exceeding \$1,500.00 was paid to Roux in exchange for Nesbitt's full legal ownership of the Mercedes on or about April of 2021. In **EXHIBIT 35**, Roux's ISIS colleague, Tony Chayban, admits the Mercedes was fully-purchased by my grown son as of on or about May of 2021.

In **EXHIBIT 1** arising on or about 6/18/2021, while at 324 Howle working private security, I negotiated \$100.00 more with Roux toward interest in the Mercedes for work performed by me, despite my having previously paid Roux's extensive costs due to Roux's illegal activity against the vehicle on or about April of 2021 (**EXHIBITS 2-3**), and despite my belief that the vehicle had been more than paid off by April of 2021.

Because I believe the vehicle was already paid off by my son months prior to 6/18/2021's violent **EXHIBIT 1** featuring greedy Roux insulting an ISIS terrorist with whom he later fled to California, I've applied the \$100.00 for transporting Roux's property on or about 6/18/2021 to my interest in the Mercedes below.

My son had wrongly believed Roux was his friend. I believe Roux, 20+ years my then-23-year-old son's senior, took advantage of my son and acted to maliciously deprive my grown son of the use of his purchased property, going on to deprive me of the same. Roux was dragging it out, ultimately legally depriving my son of the use of his purchase entirely.

#### ROUX'S UNAUTHORIZED, ILLEGAL 2021 JOYRIDE

On or about April 25 of 2021, Roux, who gave me the impression he wasn't legally authorized to operate any vehicle at that time, took what I believe was the already fully-purchased Mercedes my son had parked at 324 Howle Avenue, Charleston, South Carolina, United States, out for an illegal joyride without my grown son's permission.

A wheel fell off during Roux's 2021 joyride, perhaps because of another ISIS co-conspirator contracted by Chayban's local metals theft of which there is evidence that person (Richard "Corey" Davis) and ISIS terrorist Tony Chayban.

My ex-husband and I then paid for storage of the vehicle by Turkey's towing in Charleston, SC until I arrived to arrange towing, while I expensed repairs (**EXHIBITS 2 & 3**).

During the 2021 joyride incident, I was also forced to transport Roux to and from Turkey's towing because of his refusal to sign over the title, so the ex-con's presence was required to secure the Mercedes from Turkey's because of his illegal withholding of the title, which he promised to promptly transfer.

My costs from these events are reflected in my expense breakdown below, as they're being applied directly to my interest on the Mercedes itself as previously asserted to 2021 seller Matthew Roux once I realized he intended to entirely withhold access to a legal title and ultimately steal our car.

#### ROUX WIMPS OUT, ALIGNS WITH ISIS

Roux was told about my son's potentially fatal health condition in 2021 (**EXHIBIT 5**), but proceeded against us anyway, effectively joining ISIS by moving to California and officially aligning with a person who stated his allegiance (**EXHIBIT 33**) to the organization at least 5 times in 2020 and repeatedly in 2021, once (**EXHIBIT 33**) by making terrorist threats in the presence of Matthew Roux in 2021. The man making the terrorist threats was Anthony "Tony" Chayban, Nesbitt and Roux's landlord in 2021. Roux joined an intentional ISIS smear campaign against us as a "duty of war" to help ISIS try to ruin us and win by cheating.

Roux never reported the threats of **EXHIBIT 33**, proceeding deceptively against us, the known victims of additional terrorist threats and numerous recorded attacks by Chayban, instead.

While Chayban had played off his 5+ ardent 2020 claims of ISIS ties, which included mention of a specific family member in Lebanon, by backpedaling and claiming he'd been joking, as of **EXHIBIT 33**, along with several other 2021 pieces of evidence, Chayban continues ISIS allegiance. Chayban's 2021 threats of **EXHIBIT 33** include statements other than his specific ISIS threats wherein Chayban disavowed the United States and clearly stated his hatred for America ("Lebanese are better than you.") and ongoing treasonous attitude.

The man whom Roux aligned with is clearly an enemy of America who is using us and recruiting our people to ISIS, hurting a literal litany of decent Americans in the process.

I believe we were targeted for being Christians. Chayban, the self-professed ISIS terrorist, and his co-conspirators, have continually abused my family because of our religion and made hateful and false statements about us and our religion in public and private contexts.

Roux, who was also claiming harm by self-professed ISIS terrorist Tony Chayban at the time of the 2021 video recorded terrorist threats by Chayban (**EXHIBIT 33**), but whom I believe was more aligned with Chayban all along, seemingly "switched up" and began participating in illegal, unethical, and oppressive activities against Nesbitt and me, along with other ISIS co-conspirators. Roux is minimally essentially, in my opinion and belief, a "scab" who stopped fighting ISIS because defecting was easier for him.

Roux was given a chance to make reports about the ISIS threats in 2021 when the terrorist sued him in the same venue as my son. The small claims judge, evidently suspicious of larger issues, wanted to hear and review all the evidence. My son beat the terrorist in small claims court, but Roux wimped out, settled with a terrorist, and intentionally aligned with Chayban. Roux left the state and went to California with Chayban.

Roux refused to comply with federal law by intentionally never making reports surrounding the ISIS threats he witnessed on 5/27/2021, instead continuing to act in a terrorist's interest against us, despite my repeated warnings to Roux about treason, material support, and, in my opinion, spiritually defecting from the church by his choices to align with the antiChrist.

We've experienced extreme trauma, including torture and physical abuse in our own country. The problems remain unmitigated.

#### 18 U.S.C §2382 - Misprision of treason

"Whoever, owing allegiance to the United States and having knowledge of the commission of any treason against them, conceals and does not, as soon as may be, disclose and make known the same to the President or to some judge of the United States, or to the governor or to some judge or justice of a particular state, is guilty of misprision of treason and shall be fined under this title or imprisoned not more than seven years, or both."

#### 18 U.S.C §2381 - Treason

"Whoever, owing allegiance to the United States, levies war against them or adheres to their enemies, giving them aid and comfort within the United States, is guilty of treason and shall

suffer death , or shall be imprisoned not less than five years and fined under this title but not less than \$10,000, and shall be incapable of holding any office under the United States.” (partially of **EXHIBITS 20 & 21**).

Not only has Roux refused to document the sale of the Mercedes since 2021 (**EXHIBITS 4, 5, 18, 19, and 26**), he has since taken other actions in intentional alignment with the ISIS terrorist in clear efforts to cause added harm to and/or problems for my family in a number of contexts and venues.

#### 18 U.S.C. §241 - Conspiracy against rights

“If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or by the laws of the United States, or because of his having so exercised the same...They shall be fined under this title or imprisoned not more than ten years, or both...”

I believe Roux’s actions against us amount to his participation in an ISIS terrorist gang, despite Roux’s having personally witnessed multiple incidents of harassment, stalking, violence, and threats by Chayban and other gang members which victimized my family. Roux therefore had/has direct knowledge that we were already being victimized by Chayban and that Chayban’s activities against us were illegal when he chose to support, align with, and participate with Chayban in targeting us, amounting to Roux’s adherence to the illegal interests of a self-professed enemy of the United States of America (**EXHIBIT 33**).

This content in this lawsuit, therefore, ought to at least partially fulfill my obligation to avoid any personal violation under 18 U.S.C §2382 in separately and specifically reporting Matthew Roux to this Honorable Court for, minimally, his intentional violations of 18 U.S.C. §2382 and 18 U.S.C §2381 - Treason, as well as my reporting his cohort Anthony M. “Tony” Chayban (**EXHIBIT 33**), once again, for the same.

I view Roux’s intentional deprivation of our legal use of our purchased vehicle by the clear, intentional withholding of proof of my son’s 2021 Mercedes purchase to the point where I would have to file such a lawsuit to prove the acquisition to be part of a larger conspiracy and pattern of intentional terroristic activity and clear support of an ISIS terrorist gang against our family.

Roux has chosen to become a member of an ISIS terrorist gang of criminals and miscreants formed by Chayban in the States. Because of Chayban’s 2020 calm assertions of his alliance with a international (Lebanese) family member whom Chayban stated was a member of the ISIS organization, and because of Chayban’s 2019 travel to Lebanon prior to making those 5+

assertions of ISIS affiliation, I believe this pattern of attack against my family constitutes “international terrorism” within the United States upon my family.

Roux is illegally and intentionally stealing resources from their American opponents while knowing Chayban hates Americans, which gives the wealthiest and deadliest terror organization in the world an even greater material and operational advantage.

Roux additionally reportedly resides with Chayban in California and, I believe, pays Chayban monthly rent, which I assume comes from Roux’s United States disability benefits. I therefore assert that Roux is intentionally “materially supporting” a terrorist he never reported (18 U.S.C. §2382), while simultaneously and intentionally trying to destroy the reputations and livelihoods of those who did do the right thing in reporting and opposing ISIS in our country.

I don’t believe greedy Chayban would ever keep anybody around who didn’t pay him rent. Roux has lived in at least 3 of Chayban’s houses since at least the year 2020.

I view Roux’s withholding of documentation to register or title the vehicle discussed herein to have been fraud, attempted theft and/or theft, and/or criminal conversion of some type, besides Roux’s litany of other crimes against us.

18 U.S.C. §2339(B) - Providing material support or resources to designated foreign terrorist Organizations

“(a) Prohibited Activities -

(1) Unlawful Conduct - Whoever knowingly provides material support or resources to a foreign terrorist organization, or attempts or conspires to do so, shall be fined under this title or imprisoned not more than 20 years , or both, and, if the death of any person results, shall be imprisoned for any term of years or for life. To violate this paragraph, a person must have knowledge that the organization is a designated terrorist organization (as defined in subsection (g)(6), that the organization has engaged or engages in terrorist activity (as defined in Section 212(a)(3)(B) of the Immigration and Nationality Act, or that the organization has engaged or engages in terrorism as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).”

ISIS is a designated foreign terrorist organization, a fact of which I believe Matthew Roux was, and is, well-aware. Roux was present when Chayban made specific ISIS terrorist threats in 2021 (**EXHIBIT 33**) amid several other 2021 terrorist threats and violent attacks, including Chayban’s dozens of “guised” terrorist threats wherein the threats would include statements threatening

attacks upon U.S. citizens by “200 Arabs,” for example, instead of, “ISIS,” at times, when Chayban threatened violent terrorist attacks.

The 2021 ISIS threats were video recorded (**EXHIBIT 33**) Roux’s voice can be identified gaining confirmation (“Yes!”) from Chayban that Chayban did, in fact, intend to make, “terrorist threats.”

I believe I warned Roux specifically about material support laws in 2022, wherein after Roux chose to continue proceeding against us with Chayban’s gang. I specifically mentioned the material support laws because of their seeming popularity in sentencing these days, perhaps because they carry a long prison sentence.

Roux continued to support and align with Chayban, despite my many warnings and specific notices about prohibited United States laws. Roux continued his participation with Chayban after I made him aware of the above treason laws in a documented manner (minimally **EXHIBIT 20**) in 2022 when I attempted to extract Roux from ISIS and convince him do the right thing by us over the course of the attempted vehicle title/registration collections process.

Roux chose to be “recruited” by Chayban after initially feigning loyalty to us, to God, and to our country.

Roux thanked me for doing the “work of God” against ISIS in 2021 before he defected, I believe because he wrongly believed he would prevail by siding with Chayban surrounding a now-at-least-partially-overruled illegal civil debacle (fraud). I believe Roux always knew better. Roux is decidedly and intentionally treasonous — decidedly, intentionally supporting and participating in “terrorism” within the United States of America.

I recently searched for the Mercedes’ property taxes to try to make a determination about the disposition of the title. The County tax records still listed Matthew Roux as the owner of the Mercedes, and a call to the office yielded a response indicating that Roux’s 2021 title to the Mercedes was still on file there.

Though probably not legally, there seems to be outstanding documentation as of 2023 to indicate that ISIS has more documented rights to my stolen/converted vehicle than I presently do. I feel insulted by that. I believe that’s unconscionable in any law-abiding American’s version of acceptable reality. That is extremely offensive to my sensibilities because of my belief that Roux is part of an ISIS gang.

## 2021-2022 — GROWN SON HOSPITALIZED, CAR STORAGE PROBLEM

During late 2021-early 2022, it became more and more evident (**EXHIBITS 4, 5, 18, 19, and 26**) that Roux refused to make good on the agreement in providing what was necessary to transfer the Mercedes' registration/title to my son or me, ultimately depriving us of the vehicle's use.

Therefore, in 2021, when my son was displaced by terrorism which included threats, harassment, stalking, trespass, violence, assault, gang-stalking, lynching, and more (literally hundreds of documented incidents, including a litany of ISIS threats), and thereafter repeatedly hospitalized, nearly dying following dangerous and harmful events perpetuated by Roux and co-conspirators like Chayban (**EXHIBITS 7, 33, 35**, and much more — things have escalated), the vehicle needed to be stored.

My son was living in Charleston-area Christian transitional housing due to violent terrorist attacks at his home at 324 Howle Avenue. On or about late 2021, the powers that be at my son's transitional home downtown stated the unregistered, unused vehicle could no longer be parked at my son's then-residence.

My son contacted me for help with the ongoing Mercedes storage problem Roux created when he effectively stole our car by depriving us (regardless of which of our family members the car belonged to along this timeline) of its use, and that Roux's ISIS cohort created for us by his now-at-least-partially-overruled illegal civil activity against my grown son.

I was struggling myself due to terrorism with nowhere to immediately store the physical vehicle while being bothered by other community members like "Clyde," described in the next section, on a near-constant basis.

### "CLYDE" / 2021-2022 MERCEDES STORAGE IN WEST ASHLEY

The same on or about December of 2021 day my son asked me to help him find storage for the Mercedes, I happened to be checking my truck's oil level in the West Ashley (Charleston, South Carolina) Food Lion parking lot on Sam Rittenberg Blvd. An around 60-65-year-old cart or bag boy/man approached me to ask if I needed any help.

The man introduced himself as Clyde Wurtzel, later telling me his "real" first name was Michael, but I don't know if any of that is consistent with the person's true identity.

This person's physical description didn't match a person by the same or a similar name, so I don't want to use the name without publicly-available images of the person I'm referring to, who could have been lying about his identity.

The person I knew was a maximum of 5'7" or 5'8", caucasian, medium to dark-complected (tan), relatively svelte (130-150 lb.) with medium brown hair and crooked teeth. A later person by a similar name I found online from the North Charleston area doesn't meet with my recollection of this person's physical description. The Food Lion people, who also identified him as "Clyde," would know the person's full name.

Since I knew the person as "Clyde," I'll refer to him as "Clyde" hereafter, for the purposes of describing 2021-2022 events surrounding a person "claiming to be" named "Clyde" who worked some job at West Ashley (Charleston, SC) Food Lion.

As I was dealing with my truck oil on the above-referenced 2021 day in the Food Lion parking lot, "Clyde" began telling me his personal history of struggles with alcohol addiction, but presented himself as currently sober. "Clyde" presumably rode a moped because of the above-referenced and allegedly-prior alcohol addiction he'd described, but I am not sure.

I resonated with sobriety, in general, because I had already been exposed to activity I considered "demonic," but nonetheless dangerous, in others who struggled with alcohol abuse against me. I was in the process of forming a Christian recovery ministry based on past harm caused to me by these negative community behavioral contributors (besides the obvious negative effects on sufferers). I had finally seen an opportunity to regulate some of the dangerous or harmful behaviors of the people around me as a low-income house manager, subsequently being told by God to convert the premises in the Christian "recovery" vein in a specific manner on or about early October of 2020 (before Chayban and associates aligned with other bad people and tore my Christian ministry apart).

"Clyde" informed me that he was raised and/or schooled at an area church, which caused me to feel more comfortable with him. He told me he had participated in the chorus at another local church in the same general vicinity as the first. I know not whether any of this was true. The area mentioned was an entirely different area of Charleston from the person of same or a similar name I later found online from North Charleston while researching "Clyde," which is why I made the initial above statements/distinctions surrounding this individual's identity.

I don't want to accuse anyone by the same name or accuse anyone whose identity may have been utilized by someone else or may share a name with someone else across town.

Curious because of exhaustion, and having just discovered the Mercedes needed to move again without a legal registration facilitating its use or operation, I asked if "Clyde" knew of anywhere we could store the car temporarily without much money. "Clyde" offered the extra parking space at the nearby condo complex where his family member, he claimed, rented "Clyde" a room. "Clyde" stated that nobody used the extra spaces there, and that he was sure it wouldn't be a problem, since there was more than one extra space.

Anxious to solve our imminent Mercedes storage problem arising because of Matthew Roux and/or co-conspirators, I took "Clyde" up on the (supposedly free) Mercedes storage offer. Assuming such a grace to have been made manifest because of our benefactor's knowledge of and sympathy for my family's egregious circumstances, I facilitated and supervised the Mercedes' move from downtown Charleston, SC to "Clyde's" West Ashley condo complex.

The man I knew as "Clyde" almost immediately relapsed and/or experienced mental health, spiritual, and/or behavioral issues, and/or had been lying about being sober, harassing me for months into 2022 (**EXHIBITS 9-15**) during the emergency car storage process which necessarily needed to arise because the 2021 Mercedes seller, Matthew Roux, refused to provide us with what we needed to legally use the Mercedes.

As you can see in **EXHIBITS 9-15**, "Clyde" developed an abusive pattern of trying to use the car to try to extort me for sexual favors after I refused his multiple offers to pay me money for sexual favors.

When his illegal solicitation attempts were not effective, the person I knew as "Clyde" tried to bully me by threatening to have the Mercedes towed on a repeated basis (**EXHIBITS 9-15**), without provocation, heightening my already-extreme PTSD symptoms surrounding documented ISIS terrorism against my family and my then-24-year-old son's many recent hospitalizations due to physical health, all of which "Clyde" was aware of in 2021 and 2022.

Incidentally, I noticed over those 2021 months of checking on my vehicle that our emergency storage arrangement appeared to present no hindrance to anyone. I never noticed the spare parking spaces (2 total) being used otherwise.

Once "Clyde," in my opinion, went off the deep end behaviorally, he even went as far as to brutally mock my assertion that I wanted to become a nun, as well as any assertion by me that God, or anyone else, would punish him for his activities against my family or me (**EXHIBIT 15**).

I believe "Clyde" knew I wasn't the kind of person who would accept such offers as demonstrated by **EXHIBITS 9-15**, but tried exploiting and bullying me during what he knew was a terrible time for my family.

I believe the person I knew as "Clyde" would be likely to try such tactics, or similar predatory tactics, with another/other female(s), should such occasion(s) ever again arise. I believe "Clyde" should be stopped from terrorizing vulnerable women in that way.

I have applied my storage/"supervisory" costs for having to deal with months of abuse by the man who claimed to be "Clyde" as a part of my interest in the Mercedes C-class as a debt technically created by the illegal actions of Matthew Roux, and in partial support of my verbal claims of such an interest made directly to LKQ on or about 8/15/2022.

#### 2022 "SCRAPPING" WITH LKQ – ADDITIONAL DETAILS

After begging Matthew Roux for over a year (collections efforts, minimally of **EXHIBITS 4, 5, 18, 19, and 26**) to provide us with documentation that would allow me and/or my son to legally register the Mercedes in South Carolina and making the other investments toward my own interest documented herein, I was notified by my son of the vehicle's unauthorized disposal to the Defendant. LKQ purchased (**EXHIBIT 23**) the vehicle from my grown son without a title on or about August 15 of 2022.

Traumatized and exhausted by the effects of ongoing terrorist attacks (**EXHIBITS 7, 33, and hundreds of other incidents**, including a litany of recorded/evidence violent incidents) and emergency hospitalizations throughout 2021-2022, my grown son evidently never considered my interest in the Mercedes. Again, my grown son almost died in 2022.

My son was suffering the effects of terrorism which didn't allow him to use his normal judgment, information I quickly provided to the Defendant.

There is a preponderance of evidence in the mental health community and among psychology community authorities that "narcissistic abuse" does, in fact, cause brain damage. "Narcissistic abuse" is comprised by a range of persistent and pervasive (affecting all life areas) disordered behaviors which include covert and overt abuses inflicted upon victims by individuals suffering from the effects of Cluster "B" personality disorders, which I believe these and all terrorists are — elaborations I plan on making in future pleadings surrounding these same personalities. Terrorism is, in my opinion, the very definition of extreme "narcissistic abuse."

The terrorism my family has experienced, technically since 2020 when Tony Chayban first threatened to lie about me (dissemination of disinformation is an ISIS "duty of war") if I

proceeded against him in court, and which included and continues to include psychological abuse by ISIS participants upon us, is the most extreme example of “narcissistic abuse” I’ve ever witnessed — much less experienced. The only similar U.S. modern-day examples I can locate as to “how toxic” the abuse has been are other incidents upon other victims in precedents set by these same abusers wherein children and other U.S. citizens were abused in the same or similar ways inside and outside court settings, and higher-level abuse scenarios such as severe child abuse or sex trafficking within our borders.

The brain’s production of new neurons and laying down connections to others takes place in the hippocampus (Goleman, 2006, p. 73). Goleman stated the hippocampus is especially vulnerable to ongoing emotional distress because of the damaging effects of cortisol (p. 273). When the body endures ongoing stress, cortisol affects the rate at which neurons are either added or subtracted from the hippocampus. This can have grave results on learning. When the neurons are attacked by cortisol, the hippocampus loses neurons and is reduced in size. In fact, *the duration of stress is almost as destructive as extreme stress*. Goleman explained that Cortisol stimulates the amygdala while it impairs the hippocampus, forcing our attention onto the emotions we feel, while restricting our ability to take in new information (p. 273-274).

Goleman adds, “The neural highway for dysphoria [4] runs from the amygdala to the right side of the prefrontal cortex. As this circuitry activates, our thoughts fixate on what has triggered the distress. As we become preoccupied, say, with worry or resentment, our mental agility sputters. Likewise, when we are sad, activity levels in the prefrontal cortex drop and we generate fewer thoughts. Extremes of anxiety and anger on the one hand and sadness on the other push brain activity beyond its zones of effectiveness.” (p. 268) [5]

I have adapted the preceding two paragraphs from citations made in a PsychCentral.com article in the interest of time. I’ve included the prior two paragraphs to illustrate the presence of psychological community authorities (there are many more) who validate the fact that narcissistic abuse causes brain damage. The preceding 2 paragraphs are almost completely plagiarized with the exception of my corrections of errors I believed existed, so I didn’t use quotation marks. However, the general data being used to support my health assertions.

Narcissistic abuse includes, but is certainly not limited to, acts such as deception to or about victims, “gaslighting” efforts (efforts to manipulate/deceive victims to believe, “you didn’t see what you know you saw, hear what you know you heard, or experience what you know you experienced” — coercive tactics to quite literally intended to cause victims to question their perceptual realities and to threaten victims’ basic reasoning abilities), and violent threats, stalking, menacing, intimidation, and/or brutal assaults like those my son had experienced as of the 2022 scrapping of the Mercedes.

I believe my son was preoccupied by fear and worry which were intentionally instilled in my son by a gang of ISIS terrorists who repeatedly terrorized him over a period of years, and therefore, that my son was not in a normal decision-making mental space, nor in a mental space of considering my security interest in the Mercedes, when he scrapped the Mercedes with LKQ in 2022.

There is hope that the brain can repair itself after this kind of extreme abuse, but my family will never be safe, healthy, or even okay until remedial and restorative measures commence surrounding this entire situation.

Regardless of my son's mental state at the time of the 2022 scrapping, which followed at least 17 documented months of ISIS attacks, I don't believe my son should have been allowed by the Defendant to scrap the vehicle whatsoever without a title (§56-19-210).

Additionally, if the Defendant wouldn't allow me to redeem the car when I contacted it immediately in 2022 (**EXHIBIT 37**), I don't believe it would have allowed my grown son to do so, either, upon his being notified by me immediately thereafter of the technical mistake. My impression was that LKQ representatives considered its "purchase" completed and irreversible.

I therefore don't believe my son was/is at-fault for the 2022 disposal mistake.

My son erroneously relied upon LKQ for advice about the sale of our then-joint vehicle — a vehicle whose interest I would have been willing to share with my son due to his own prior investment and extensive hardships. My son thereafter immediately surrendered his interest in the vehicle upon my reminding him of my interest following his 2022 disposal with LKQ, as well as repeatedly verbally and electronically (via text message) surrendering his interest in 2022 and 2023 conversations including, but not limited to **EXHIBITS 17, 23, and 29**.

I believe LKQ's advice to my grown son, Tristen Nesbitt, surrounding the sale of the Mercedes on or about August of 2022 was incorrect:

ARTICLE 3 - Certificates of Title - SECTION 56-19-210 - Certificate of title required to sell or mortgage vehicle or mobile home; exception

"It shall be unlawful for any person to sell or offer for sale or mortgage in this State any vehicle of a type required to be registered and licensed in this State, or any mobile home, unless a certificate of title has been issued therefor and is currently valid; but this provision shall not apply to South Carolina dealers in the sale or offering for sale of new vehicles or mobile homes for which there is a manufacturer's certificate of original made out to the person offering such vehicle or mobile homes for sale."

The sale of my Mercedes to LKQ does not meet the criteria for any exemptions listed in the following section, §56-19-220, based upon my examination.

### 2022 SCRAPPING AFTERMATH – EFFORTS TO RECOVER MERCEDES

Within 72 and probably closer to “under 24” hours (I believe it was the same day) of the 2022 unauthorized sale of the Mercedes (**EXHIBIT 37**), I contacted LKQ via telephone.

**EXHIBIT 37** is incidentally so heavily redacted because of prior criminal gang activity upon my family which harmed us, giving me pause about the inclusion of any identifiers whatsoever, including address(es), account number(s), other telephone numbers representing unrelated incoming and outgoing August of 2022 private telephone calls made and received by me, and even the model/type of the mobile phone that was used on account of concerns brought on by prior electronic intrusions.

A preliminary motion for **EXHIBIT 37** safety redactions is enclosed. The Defendant’s stipulation to such safety redactions would be much appreciated by me (the Plaintiff).

The 11-minute August 15, 2022 telephone call to LKQ at 1:11 p.m. to destination “Parts, CL” (*...did the Defendant get its own city and state?*).

Distressed but polite, I informed the female LKQ scrapyard representative who answered that I had an interest in a vehicle which had recently been "scrapped" by my grown son at their North Charleston, SC scrapyard. I informed LKQ the vehicle technically wasn't my son's to sell without my permission as of 2022. LKQ obtained the vehicle's details from me. The first LKQ representative stated she couldn't help me, transferring me to a supervisory and/or corporate representative of a type and level I cannot today recall.

The second female LKQ representative informed me there was nothing LKQ could do to help me recover my vehicle, and that there was no one else at LKQ I could speak with about the problem.

I don't believe I should be having to write the document now because LKQ refused to help me in 2022. I believe that's minimally unfair to me personally.

Based on my understanding of §29-15-10, if a Magistrate's Order was somehow utilized in order to legitimize the Mercedes' 2022 sale, “The vehicle's purchaser shall take title to the vehicle free and clear of all liens and claims of ownership, shall receive a magistrate's order of sale, and is entitled to register the purchased vehicle and receive a certificate of title.”

Whatever type of waiver or Order was used to accomplish the transaction, I don't believe there would be any legal circumstance for LKQ to immediately invalidate any verbal claim of ownership to a vehicle it had just purchased during a legally-mandated destruction waiting period (§56-5-5670 (E)(6)) .

I made clear and immediate verbal claims of ownership which constituted what I believe a reasonable, conscientious person would consider a "conversion" red flag directly to LKQ (§56-5-5670 (E)(4)), whether or not the Mercedes was sold with a title in 2022.

I am not intimating that I believe the Court ought to pursue criminal charges against the Defendant, but I would like to make the Defendant aware so that it will be more careful.

This clearly was not a simple case of a lost or misplaced title, even if LKQ had assumed that was the case when it first purchased the Mercedes from my grown son. I made the Defendant immediately aware that there were more complex issues with the vehicle title during my direct assertions of ownership.

Therefore, I do not believe the legal option of an Order of destruction or waiver of any kind without a title would legally have legitimized the Mercedes' sale, purchase, or destruction without a title, since I made a prompt claim of ownership/interest in the vehicle to LKQ in 2022, especially considering South Carolina §56-5-5670 (E)(4)'s language about the due diligence process, stating:

"...If the Department of Motor Vehicles indicates to the demolisher or secondary metals recycler that the vehicle has not been reported stolen, the demolisher or secondary metals recycler may proceed with the transaction. In such case, the demolisher or secondary metals recycler is not criminally or civilly liable if the vehicle later turns out to be a stolen vehicle, unless the demolisher or secondary metals recycler had some other knowledge that the vehicle was a stolen vehicle."

I informed LKQ about the misunderstanding immediately, asserting my claim of interest in the vehicle to LKQ on 2 immediate 2022 occasions (**EXHIBIT 37**). When I informed LKQ in 2022 that my son wasn't authorized by me to sell the vehicle, and that minimally, a misunderstanding had arisen between co-owners who were literally victims of ongoing ISIS terrorism, it should have immediately been concerned about conversion or theft claims and proceeded more carefully relative to my stated claim.

If LKQ didn't view or possess the vehicle's title in order to confirm the owner or owners, then I believe additional due diligence needed to be conducted by the Defendant in order to verify the vehicle's legal standing surrounding the Defendant's 2022 acquisition anyway.

If I hadn't done all the work herein and/or I hadn't been so gracious, LKQ could have opened itself up to added liability based on its lack of prior evidence of my son's prior interest based on Roux's intentional, criminal withholding of any evidence of my son's interest.

What if my grown son hadn't had an interest or perceived interest in the scrapped Mercedes at all? There was no interest in the vehicle on my son's part legally documented anywhere prior to my work herein.

I believe the words and/or general verbal indications of the concepts of "mine" and "part-mine" should be treated equally in any scrapyard rightly offering any claimant documentary and/or other redemptive options in these "scrapped" vehicle scenarios wherein titles are not present and/or legal right to sell or purchase is in question, especially during the 72-hour legally-mandated vehicle destruction waiting period.

No representative at LKQ offered me any buy-back or redemptive option, such as my paying LKQ the \$200.00 or so it probably paid my son for "scrap" (he can't recall the amount and LKQ didn't inform me of any payments), nor any other dollar amount, in exchange for the safe, intact return of my vehicle.

I was offered no option whatsoever to recover my loss, save for independent legal action requiring study and work that an average person probably would not undertake, on top of being otherwise simultaneously terrorized by the group who originally stole my car, necessitating my leaving an entire geographical area just to get to a safe space to accomplish such research and compile this action.

LKQ, a \$14.54 billion Fortune 500 company, should expend ample time, energy and resources to develop and implement training and education for its employees who must doubtless troubleshoot sometimes-complex legal circumstances surrounding its acquisition of distressed vehicles from vulnerable populations, including resources for customer service and procedural training tailored toward resolving the legal complexities of title conflicts and/or claims of interest such as those arising in 2022 surrounding the disposal of my Mercedes — an asset surely irrelevant to LKQ's overall holdings.

No LKQ representative informed me of the 72-hour waiting period for demolition (in the event a claim of waiver under §56-5-5670 (E)(6)) as prescribed by South Carolina law. There is also similar language about 3-day waiting periods in other Sections which may apply.

Had the Defendant correctly informed me about any applicable 3-day (or more) demolition waiting period under §56-5-5670 (E)(6), or simply shown a bit of flexibility or sympathy when I described the 2022 circumstances, I could have taken action in my own favor, and I would have been significantly more likely to make immediate efforts to assert my legal rights to my then-intact property, making claims and/or implementing failsafe measures surrounding my now thrice-stated interest in the scrapped Mercedes-Benz.

Instead, though, I was required to go and study these laws in order to determine the accurate reality of the 2022 legal circumstances because, I believe, LKQ misled me about my options. My work/study time means the Mercedes has probably been long-since destroyed by LKQ, who never, in my personal estimation, “needed” any vehicle in the way my family did (or does).

I was told by LKQ in 2022 that there was nothing to be done to recover or redeem my vehicle once LKQ acquired it from my son without a title. I believe I was, therefore, misinformed by LKQ. I believe I was twice-misled by LKQ about my options surrounding my 2022 claims of interest.

LKQ’s 2022 failure to inform me of the waiting period when they knew I was distressed and unlikely to conduct my own legal research led me to believe my vehicle would immediately be, or had already been, destroyed or dismantled. I believe the withholding of this information to others with similar claims would also tend to confuse and discourage others from taking action in their own interests within the 72-hour waiting period.

When the Defendant twice-refused me remedial recovery of my recently-sold titleless vehicle in 2022 after multiple notices by me of my interest (**EXHIBIT 37**, transferred call), I believe LKQ thereby intentionally deprived me of the use of my vehicle, which caused greater problems and losses than those discussed herein.

*“I will bless those who bless you and curse those who treat you with contempt. All the families on earth will be blessed through you.” - the Holy Bible (Genesis 1:23, NIV)*

Oxford Languages’ first two definitions of the word “contempt,” noun:

- 1) “the feeling that a person or thing is beneath consideration, worthless, or deserving scorn.”
- 2) “disregard for something that should be taken into account.”

If LKQ obtained some alternate legal authorization, including but not limited to any Order or claim of waiver for the continued material possession, destruction, dismemberment, or disposal

of the vehicle, aside from my assessment of the 2022 Mercedes disposal circumstances not meeting the legal criteria for any of those processes according to my research, I believe LKQ's behavior in proceeding against me in pursuing and securing such "legal" authorization to continue to materially possess or to destroy my Mercedes by any process in lieu of a an absent title after I twice-informed them of my interest was malicious, unfair, unconscionable, and likely illegal because they had been specifically made aware of my interest (my claim against the vehicle title, my claim of potentially illegal activity in its conversion without my authorization) in a timely manner following the vehicle's on or about August 15, 2022 unauthorized sale/disposal by my unwitting adult son.

I don't believe my son or I were at the greatest burden of familiarity with the complexities of local used vehicle sale, purchase, or disposal laws in a scenario wherein the used vehicle purchaser, a Fortune 500 company who seems, to me, to generate substantial revenue in making material acquisitions from low-income folks and/or those suffering financial hardships, would be better-equipped and generally expected by the average person to be more educated than a distressed and/or low-income seller about those legal complexities.

I don't believe an average used vehicle owner/possessor (an individual, a private citizen) is as likely to research complicated laws about "scrapping" a used car before contacting the potential purchaser (the scrapyard, who essentially "does this for a living") to determine scrapping/disposal requirements and recommendations in such a scenario.

In addition, based on my interpretation of my son's disposal description of EXHIBIT XXX, it seems clear to me that my grown son was confused as to the type of transaction that took place in 2022 with the Defendant. My son used the word, "pawn," (verb), which is defined as, "deposit (an object) with a pawnbroker as security for money lent," according to Oxford Languages Dictionary, indicating to me that my grown son may have believed he had some later vehicle redemption opportunity over and above my own expected redemption opportunity, which was denied by the Defendant in 2022 (**EXHIBIT 37**).

My son clearly didn't understand the nature of the August of 2022 transaction.

My son and I each took LKQ representatives at their word regarding our options in 2022. Relying upon what I believe were LKQ's misdirected/incorrect statements about vehicle sales/disposal procedures, I believe we were both taken advantage of by the Defendant.

#### LKQ EFFECTIVELY REVOKED/FORFEITED ITS OWN INTEREST

I believe LKQ invalidated its own interest by taking possession of the physical vehicle (VIN \*\*\*\*\*2656) without a title (§56-19-210) and, I believe, without the presence of a

specific, statutorily-prescribed circumstance allowing it to legally purchase the vehicle without a title.

Because of the above, and because LKQ offered me no immediate remedy or recourse to recover the vehicle in which LKQ was timely twice-informed I had an interest, and since therefore and thereafter, a process of dismantling/destroying my vehicle would've more than likely commenced as its parts were sold off beginning in 2022 at LKQ's "Pick Your Part" used auto parts location in North Charleston, South Carolina, I am asking this Honorable Court to please legally invalidate the Defendant's 2022 purchase, extinguishing LKQ's interest in this previously- or partially-existing vehicle if it will not immediately, willingly, and permanently surrender any claim to the vehicle in my favor and/or provide a suitable remedy.

#### 2021 AND 2022 SELLERS HAVE NO CLAIM OR INTEREST

As you hear Roux's ISIS cohort Tony Chayban admit in **EXHIBIT 35**, the vehicle's interest was fully-surrendered by Roux to my son ("bought," past tense), other than the ongoing title/registration problem I believe Roux and Chayban intentionally, illegally caused as of on or about April of 2021, my son's Mercedes purchase was a fact which was essentially "public knowledge," beyond the knowledges of just those witnesses, parties, and owner or alleged vehicle owner(s) discussed herein.

The 2021 agreement between Roux and my son was satisfied. Roux provided my son with the vehicle when my son moved in July of 2021, surrendering its physical possession at that time.

There should be no further contention as to my son's 2021 purchase of this vehicle from Matthew Roux (**EXHIBITS 1, 4, 5, 18, 19, 26 and 35**), who refused him/us right to the vehicle's legal registration, based on the painstaking demonstrations of the facts and evidences contained in my lawsuit.

My son has repeatedly himself affirmed Roux was no longer the legally-authorized owner as of the on or about the April of 2021 completed sale of the Mercedes to my grown son, besides my personal knowledge that Roux was no longer the legally-authorized owner as of on or about April of 2021 (minimally evidenced by on or about May of 2021's **EXHIBIT 35**).

If Roux believed he had any claim to the Mercedes, then he should have made it already. He also shouldn't have permanently abandoned the physical vehicle to the 2021 purchaser when my son moved in July of 2021, thereafter making no future effort to retrieve it.

There should be no further contention as to my son's intentional forfeiting of his rights to the vehicle when he took action which indicated his full intention to sell it, materially providing the

physical vehicle to LKQ in August of 2022, nor should there be any further dispute as to my son's continual statements (**EXHIBITS 17, 23, and 29**, along with many others) of his forfeiture of any right or claim to the Mercedes thereafter, based on my painstaking demonstrations of the facts and evidence contained herein.

ITEMIZED EXPENSES

(Breakdown of Mary Griffith's 2004 Mercedes-Benz Claims of Interest)

- |                           |   |   |
|---------------------------|---|---|
| 1) On/about 4/25-5/2/2021 | \$204.25 -<br>(that I can document now - this is around half what I recall we paid) | Turky's Towing because of Roux's illegal 4/2021 joyride ( <b>EXHIBIT 2</b> )                                |
| 2) 5/23/2021              | \$80.00 -   | Mechanic for Mercedes wheel/tire repair following Roux's illegal joyride ( <b>EXHIBIT 3</b> + \$40.00 cash) |
| 3) 5/23/2021              | \$400.00 -  | 4 hours @\$100.00/hr. to supervise towing and repairs/Mercedes ( <b>EXHIBITS 1, 2 &amp; 3</b> )             |
| 4) 6/18/2021              | \$100.00 -  | Move Roux's property \$100.00 for job ( <b>EXHIBIT 1</b> )  |
| 5) 10/7/2021              | \$100.00 -  | Contact Roux about title ( <b>EXHIBIT 4</b> ) \$100.00/hr.  |
| 6) On/about 12/2021       | \$200.00 -  | 2 hours @ \$100.00/hr. Supervise vehicle transport to West Ashley storage "Clyde" ( <b>EXHIBITS 9-15</b> )  |
| 7) 12/6/2021              | \$50.00 -   | Efforts to contact Roux about title ( <b>EXHIBIT 5</b> ) @\$100.00/hr.                                      |
| 8) 12/16/2021             | \$50.00 -   | Collections efforts - Roux ( <b>EXHIBIT 5</b> ) \$100.00/hr.  |

9) 2/18/2022	\$1,000.00 -	My regularly dealing with abusive “Clyde” for a minimum of 2.5 months (approx. 12/2022 thru 2/18/2022) in order to store, monitor & preserve car while son was hospitalized at approx. \$400.00/mo. <b>(EXHIBITS 9-15)</b>
10) 2/18/2022	\$200.00 -	2 hours @\$100.00/hr. - Transport to new location
11) 8/6//2022	\$50.00 -	Contact Roux about title \$100.00/hr. for collections
12) 8/15/2022	\$50.00 -	Consult w/ Nesbitt following disposal (min. half hour @\$100.00/hr.)
13) 8/15/2022	\$50.00 -	Phone call (min. half hour @\$100.00/hr.) to LKQ in asserting my interest in vehicle <b>(EXHIBIT 37)</b>
14) 10/13/2022	\$50.00 -	Consult w/ Nesbitt about car, .5 hours \$100.00/hr., .5 hours
15) 10/26/2022	\$50.00 -	Consult w/ Nesbitt about car, .5 hours \$100.00/hr., .5 hours
16) 12/1/2022	\$50.00 -	Consult w/ Nesbitt about car \$100.00/hr., .5 hours
17) 12/1/2022	\$300.00 -	3 hours of paperwork at \$100.00 per hour
18) 5/18/2023	\$300.00 -	3 hours of paperwork at \$100.00 per hour
19) 5/18/2023	\$50.00 -	Research owner status (min. half hour @\$100.00/hr.), value <b>(EXHIBITS 27, 28)</b>
20) 5/21/2023	\$50.00 -	Consult w/ Nesbitt about events/car
21) 6/24/2023	\$500.00 -	5 hours study, paperwork @\$100.00/hr.

22) 8/2022-11/2023	\$1,500.00	Reasonable rental costs at \$100.00/mo. for LKQ's continued possession of my Mercedes-Benz and/or its remains
23) 9/2022	\$18.85	My rideshare costs
24) 3/2023	\$76.30	My rideshare costs
25) 6/26/2023	\$400.00	Paperwork, study @\$100.00/hr.
26) 7/28/2023	\$350.00	Paperwork + title research @\$100.00/hr.
27) 10/28/2023	\$450.00	Paperwork @\$100.00/hr.
28) 11/22/2023	\$450.00	Paperwork @\$100.00/hr.

TOTAL: \$7,129.40

#### CAR VALUE

My son purchased the Mercedes (**EXHIBITS 1, 8, 16, 34 & 35**) from Roux in 2021 at a lower cost than the Mercedes' value in hopes of getting a good deal on his first (ever) car of his own which was worth more than he paid, while being unaware that Roux intended to run off and join forces with a self-professed ISIS affiliate (**EXHIBIT 33**), depriving my son of its title and legal use or operation.

I believe I ought to benefit from my son's attempted advantageous investment in gaining a vehicle and/or settlement greater than the average market value of the Mercedes itself.

Kelly Blue Book's maximum private party resale value of \$4,319.00 (**EXHIBITS 27 and 28**) leaves an outstanding balance of \$2,810.40 upon the prior amount's deduction from my above expenses after LKQ replaces and/or reimburses me for the vehicle.

## MY FAMILY'S POSITION

My family has been continually terrorized because we exposed and reported illegal behavior by an ISIS terrorist gang against us in Charleston, South Carolina, whereinafter corrupted Americans willingly joined the gang and joined in the terrorist attacks against us.

I don't know of any other civilians in Charleston County who stood against these criminals after knowing about their ISIS ties, alignments, and allegiances except my family. Matthew Roux (2021 Mercedes seller, minimally of **EXHIBITS 1, 4, 5, 18, 19, 26, 34 and 35**) were legally required to make reports about about terrorist activity and/or threats, didn't, and remained comfortable while our lives were torn apart after we did the right thing.

We never even got to use the car before the 2022 scrapping.

We were already trying to positively serve the community in 2020 in establishing an outreach when we were targeted, robbed, and terrorized by ISIS as they sought to overthrow the local government.

I have had to move at least 12 times because of unmitigated terrorism.

Despite continued, persistent attacks and oppression by malicious individuals, I know for a fact that I would have managed to file the underlying lawsuit surrounding my son's 2021 car purchase in minimally resolving/acquiring the Mercedes' legal title and registration before violent 2023 events which, I believe, would have been avoided were my son not on-foot if not for the added necessity of legal research and time-consuming compilation of these legal pleadings perpetuated by LKQ's inflexibly and callously proceeding against me in August of 2022.

The loss of this vehicle was additionally obstructive to my life functioning and placed other rightfully-owned property of ours (my family's, my business') at-risk, necessitating immediate and urgent relief wherever possible.

My son, a Christian prophet, almost died in 2022 and has been repeatedly otherwise violently targeted since 2021 and into 2023 surrounding these events, which amount to "organized crime" as well as the legal definition of "terrorism."

My son's identity has been stolen by ISIS and those reports also haven't been properly addressed or remediated, either, causing more and more and more work for me. We are both still in positions of having difficulties with basic life functioning, effects by ISIS and their corrupt affiliates which will probably take years to remediate. I've recently had an account repeatedly

and fraudulently used. I, too, worry about identity theft surrounding what was done, and what continues to be done, to oppress us and try to make us have nothing, by the antiChrist within our own country. This has been too much.

My family shouldn't be materially deprived or penalized any further for being the only people I know of in the Charleston community who knew about the ISIS activity and did the right thing in this scenario by making reports.

ISIS, the world's wealthiest and most dangerous terrorist regime, generates a large amount of its assets worldwide by specifically kidnapping and extorting resources from Christians. This can't be allowed to happen in our country again.

**EXHIBITS 9-15, 38, and 39** are not, unbelievably, the only 2 incidents wherein I was personally threatened with the towing of the Mercedes by malevolent male community miscreants who knew about the unmitigated ISIS attacks upon my family, but who thereafter made threats in specific, intentional, illegal efforts to extort sexual favors from me. These miscreants noticed a woman, whose son was frequently hospitalized in fatal condition, alone, were told about the ongoing ISIS attacks, and still chose to inflict additional abuse upon me anyway — technically then having aligned with the interests of the ISIS organization and adopted ISIS ideology against my family, in my belief and opinion, and by my interpretation of United States Treason and/or other U.S. laws.

“As free, and not using your liberty to cover maliciousness, but as slaves of God .”  
— The Holy Bible, I Peter 2:2 (KJV).

I personally suffered a lot of abuse over that car because so many people decided to misbehave.

#### LKQ'S POSITION AND RESPONSIBILITY

LKQ, a Fortune 500 company, is, by any reasonable standard, in far better condition to be losing its interest in an inexpensive used vehicle it already made a profit from dismantling, destroying, and selling off as “parts” because of these mistakes, if these were mistakes, than is our family, who are victims of literal ISIS terrorism from which we still have not yet experienced full protection. Again, information about our circumstances was previously shared with LKQ by me at at least one, but probably 2 separate 2022 points of contact (**EXHIBIT 37** evidencing my call to 800-962-2277, which I believe I recall reached the local store representative directly, followed by the transferred call and subsequent refusal of remedy by another department).

I believe LKQ should train its employees on how to handle claims of ownership to a title within the 72-hour demolition waiting period I assume exists in some, most, or all jurisdictions for these

kinds of reasons, especially surrounding vehicles with absent titles wherein the word “conversion” might remotely be part of one’s thinking or conversation.

I believe LKQ ought to immediately satisfy its obligation to me.

#### SOLUTIONS IN THIS MATTER

If the Mercedes itself hasn't been completely destroyed as of 2023, my vehicle is nevertheless unlikely to be in the same ("good") operating condition it was at the time of its 2022 unauthorized sale by my unwitting son.

I believe it’s in LKQ’s best interest, and the right thing to do, to honor the highest possible value of my son’s attempted “investment vehicle.” It’s not LKQ’s fault that my son was duped by Roux or that both of us were wronged previously, but I believe it should help where it is able, given the culmination of events.

I believe it would be the most appropriate action for LKQ to immediately resolve this in my favor by way of, minimally and immediately, a replacement vehicle and/or my outstanding above balance and/or my total above balance.

I regret that LKQ had to be a part of this story, but am hopeful that LKQ will help me clear things up in a positive way.

#### RATE FOR MY ONGOING PARTICIPATION IN THIS MATTER

I was/am not in a financial place of affording all this extra time for paperwork over that car. I now have other assets at-risk of loss and/or theft because of these events. My interests cannot be further tampered with.

There are larger matters that needed my attention instead of this created necessity which, I believe, arose because of LKQ’s 2022 lack of sympathy and/or empathy for my personal circumstances. My family is literally contending with a gang of terrorists who refuse to leave us alone or stop trying to destroy the remnant of our Christian outreach. This extra work is unfair, oppressive, and stressful for me.

I will charge \$1,000.00 per hour (hazard pay) for each and every hour of paperwork, study, research, or work of any kind required on my part in this matter beyond this document, especially wherein stressful evidence is involved, because having to do extra/unnecessary paperwork has caused me so many losses thus far, and because this inconvenience has affected

my life negatively by upsetting me, causing me health problems, and taking up my time and energy that was needed for other tasks.

The above rate will be enacted henceforth in efforts to at least partially compensate myself upfront for the emotional and other harm caused by the necessity of stressful minutiae, in order to fund my ongoing participation, and in order to prevent or partially prevent the later necessity of additional stressful legal participation or traumatic evidentiary review or preparation by me in this matter.

I regret that LKQ was brought into this, but if I have to relive the trauma over and over again of my family being assaulted, attacked, exploited and abused and/or listening to heartbreaking “*This Boy’s Life*”-esque, psychologically and/or otherwise abusive recorded/documentated exchanges with a dangerous and manipulative ISIS terrorist and/or the terrorist gang he created in minimally South Carolina, California, U.S.A., and abroad, somebody is going to have to pay a lot more money. It cannot — and will not — be us again. My family has been victimized enough.

#### ISSUES & IMMINENT PROCEDURAL REQUESTS

God’s messages through me for the church literally contain time-sensitive safety information that affects us all. I’ve already once been prevented from alerting South Carolinians of earthquakes and other urgent safety issues like these because of continual attacks on my life, my family’s, and our material and other interests. What if losses from all those events could have been avoided if more people had chosen to do right by me the first time?

I am able to understand how a mistake could arise, but I’m asking LKQ to please not intentionally deprive me of something it can easily provide. I didn’t charge LKQ for a lot of my more recent work because it coincided with other things, and because I don’t have time to do any more math now.

I contacted LKQ in North Charleston, South Carolina, by telephone upon the expiry of the legally-mandated annual sales records destruction waiting period because this lawsuit was arduous, I had other concerns, I had to move multiple times because of losses like these and also due to terrorism which included violence.

The local representative, following my online form submission through LKQ’s website, was verbally informed about my lawsuit in August of 2023 and asked to please ensure the 2022 Mercedes acquisition record was preserved. After taking my son’s information, the general 2022 disposal date, and the Mercedes’ information, the representative informed me that records at that particular location were kept “long past” the legally-mandated 1-year period.

I have attempted to contact the Defendant's corporate office via Facsimile since (at least) on or about 8/11/2023 to determine whether LKQ would be willing to stipulate to internet publication of service, electronic service, or service via fax because of hardship and because of the extra printing and mailing costs, but LKQ's publicly-listed corporate fax number still doesn't work as of November of 2023.

The systems's automated female voice informed callers that their "call may be monitored or recorded" instead of reaching a traditional fax tone, whereinafter the calls would automatically and immediately disconnect. This transpired at least 15-20 times when I tried to utilize (312) 621-1696 between August and November of 2023. On November 8, 2023, as I was completing this pleading, I tried the above fax line again. After being told my "call may be monitored or recorded for quality assurance," as usual, rather than the system automatically disconnecting my call, a fax tone was finally audible for the first time during any of my attempts, which hadn't been the case over the prior months or earlier in the month of November of 2023.

No facsimile attempt was successful during the dates specified.

LKQ was otherwise unresponsive in that CEO Dominick Zarcone at the Defendant's corporate office also hasn't returned my August of 2023 telephone call/voicemail message surrounding the same requests and/or stipulations based on briefly-described events and circumstances, so I'm asking the Defendant to please agree to a hearing of my Motion of Summary Judgment without the usual waiting period because I urgently need the resources.

If LKQ refuses the above, I'm asking the Honorable Court to please urgently consider the same.

I'm also asking the Defendant and/or this Honorable Court to please allow for publication of service via the Internet (such as via social media), but minimally electronically (email would be easier than facsimile anyway), based on my hardships due to terrorism.

Thank you for your attention to and consideration of my concerns.

Respectfully Submitted,

Mary A. Griffith