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May 13 2024

SC Court of Appeals

IN THE COURT OF COMMON PLEAS

STATE OF SOUTH CAROLINA

CIVIL ACTION NO. 2020-CP-07-00899

COUNTY OF BEAUFORT

NON-JURY THE

RACHEL M. POLITE

PETITION

Plaintiff(s),

VIOLATIONS OF THE JUDGMENT

vs

AND FINAL ORDER

KAREN POLITE

Defendant(s).

OF APRIL 27, 2022 AND

RELIEF FROM SAME

AMEND MAY 10, 2024

CERTIFICATE OF SERVICE

To: Alysoun M. Eversole, Attorney for the Plaintiff: Rachel Polite

Chaplin, please take notice that I Karen P. Polite, prose (Defendant) will

move to Petition the court on May 3, 2024 in (15) days or sooner thereafter as may be

heard, by Honorable Marvin H. Dukes, III, Beaufort County Master - in-Equity, of the

Violations of the Judgment and Final Order entered April 27, 2022.

Pursuant to [SC Code § 16-3-1700\(2\)\(a\)\(6\)\(H\)](#) (2023) First "Cause of Action"

Violation of "Consent Order, Harassing, Intimidating, Guests, Invitees, Stalking, and

Destroying Personal Property, Emotional Stress Karen" file a rule to show "First

Cause of Action" Violation of "Consent Order, Harassing, Intimidating, Guests,

Invitees, Stalking, and Destroying Personal Property, Emotional Stress, Punitive

Damage. The first cause of action Allison, ever saw client Rachel Polite came on to the property on September 9, 2022 **as a violation** causing damages to Karen's home, and causing Karen emotional distress as well.

On September 9, 2022, when Rachel and her children had no right near my home, according to the Judgment and Final order of **April 27, 2022.**

On November 7, 2022 a motion hearing was held present at the hearing was the Plaintiff, Rachel M. Polite, Claudia Polite (aka eg. her children) and Her Attorney, Alysoun M. Eversole. Esq, and Karen P. Polite appearing pro-se. After Rachel testified by saying "her and her children tied a rope behind a truck and pulled the trees from Karen's house at the trial court, on November 7, 2022, according to the transcript the court found " some form of Intimidation and some form of Harassment".

1. "Universal Citation: SC Code § 16-3-1700 (2013) As used in this article:
(A) "Harassment in the first degree" means a pattern of intentional, substantial, and unreasonable intrusion into the private life of a targeted person that serves no legitimate purpose and causes the person and would cause a reasonable person in his position to suffer mental or emotional distress. Harassment in the first degree may include, but is not limited to:"

(2) visual or physical contact that is initiated, maintained, or repeated after a person has been provided oral or written notice that the contact is unwanted or after the victim has filed an incident report with a law enforcement agency;

(3) surveillance of or the maintenance of a presence near the targeted person's:

(a) residence;

(4) vandalism and property damage.

(B) "Harassment in the second degree" means a pattern of intentional, substantial, and unreasonable intrusion into the private life of a targeted person that serves no legitimate purpose and causes the person and would cause a reasonable person in his position to suffer mental or emotional distress.

Harassment in the second degree may include, but is not limited to, verbal, written, or electronic contact that is initiated, maintained, or repeated.

The second cause of actions was damage to Karen's home. Karen asked this court to make her whole by ordering the Plaintiff to pay and award Karen the sum amount in damages including, moving expenses of \$48,394 **and Punitive Damage \$100,000 to Karen P. Polite.**

See “ Ford v. Hutson

276 SE 2d 776, 276 SC 157 - SC: Supreme Court, 1981 - Google Scholar

... A jury awarded plaintiff Larissa S. Ford \$1,500 actual damages plus \$100,000 punitive damages against defendant Arthur C. Hutson for intentional infliction of emotional distress ..."

On Friday September 9, 2022 the Defendant Karen Polite **pro-se.** reach out to; Beaufort County Court, Courts of Appeal and Ms. Alison Eversole the Attorney for Plaintiff Rachel Polite Chaplin by; email with photos taken at 6 Ladson Road St. Helena Island S.C 29920 about destruction and damage to Karen's property-home.

Karen believes because she was satisfied with the judgment of the bond of August 15, 2022 as ordered by the courts paying more than \$8,000 she should be made whole, because of damages to her home, and emotional distress cause on September 9,2022 by; Plaintiff Rachel Polite and her daughter Claudia Polite (aka her children) for Violating the Final Order and judgment (Rp.61,line 4 transcript) of APRIL 11,2022,.present her daughter Claudia Polite (aka her children) tying a rope behind a truck pulling the trees next to my house.

On November 7, 2022 at the motion hearing the Plaintiff Rachel in her own defense would testify,

(Rp.43 line 23-25 trans) (R.p. 44 line 1-8 trans) Alysoun Eversole, who also said (R.p.60 line 11-12 trans)" The tree damage ? the tree fell on her place. It did damage the trailer. Even though Plaintiff violated the Final judgment Karen continued paying the bond as she was ordered by the courts.

On April 23, 2024 The court ordered Karen home " is in such A condition that it's incapable of being removed from the premises In manner other than by demolition", as described by the Attorney.

On September 5, 2022 Monday Labor Day, I reached out to the Courts and Attorney Alison Eversole about her client Rachel Polite Chaplain guests, and invitees on this property Harassing, Stalking and Intimidating me.

Four days later my home is on the ground with major damage. Broken glass both inside and out. **Television destroyed \$350.00.** Two broken house windows **\$284.00.** **Busted pipelines \$140.00.** Water damage from the rain inside the home. **The front deck completely destroyed \$2500.00.** **Cabinets in my kitchen ,and floors value \$8,000, not even 3 years old.** My wall interior roof **\$280.00.** **Cost associated with lifting my home is \$7000.**

septic tank \$1500 to \$5000

water meter \$1,000 to \$3,000

front deck \$8,920

back deck \$3,920

roof \$1,500

Moving costs \$5000

impact \$ 2500

Total amount of damage \$48,394

Please Award Punitive Damage in thy amount of 100,000

APRIL 27,2022 on harassing stalking and property damages

SC Code § 16-3-1700

For such other further relief as this Court may render just

May 3,2024

s/ Karen P. Polite

Karen P. Polite

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Pro,se Karen Polite /s/

Attorney for Petitioner

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