

SOUTH CAROLINA COURT OF APPEALS

Peggy Kandies

Appellant

Vs

Case no: 2023-CP-10-1484

Appeal Case No:2024-000456

AMENDMENT TO MOTION TO REINSTATE

CASE NO: 2024-0456

City of North Charleston

Respondent

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SEP 26 2024

SC Court of Appeals

Peggy Kandies, Appellant comes before this court to request that her appeal be Reinstated, because she is representing herself in this case and have corrected her error the court requested.

The judge who was on the bench on February 15,2024 was removed by The Judicial Merit Commission and The American Bar Association in Nov.2023 and was not qualified to be on this case.

The appellant was unaware that he had been removed, or she would have asked him to Recuse himself and request the Court to grant her a Continuance.

Bentley Price did not allow Peggy Kandies to present her case to the court but allowed the attorneys, J. Matthew Johnson and Atty Southern to present arguments for the City of North Charleston, Respondents, and then left the court room, and Bentley Price left the court room.

The attorneys wrote their own ORDER, WITH PREJUDICE, as an email stated that was requested by Bentley Price with an e-signature and sent to Peggy Kandies, Appellant a copy along with an email to Bentley Price. This was an ethics violation and a violation of Peggy Kandies' Constitutional Rights to Due Process under the Fourth Amendment and Fourteenth Amendment.

The Respondents have Prejudiced appellant in this action. Prejudiced by a preconceived opinion that is not based on reason or actual experience in knowledge of the facts of the case, therefore, making it biased, and may result in harm and injury to Appellant.

Bentley Price discriminated against Appellant by telling the Respondents to write their own Order and he would sign it. This is disturbing that this could happen in a court of law.

Appellant filed an appeal to be heard by a qualified judge and to get equal justice under the law.

FACTS OF THE CASE

The case **2023-CP-10-1484**, was filed in Charleston County Court after William Taylor, employee of the City of North Charleston in Code Enforcement, on July 10, 2024, did break into the front door of the home of Peggy Kandies, and removing the locks and door frame plates, brass, and door handles that were the original antique door plates and handles, to enter the home while Appellant wasn't home. There were illegal aliens, 8 or 9 from Mexico, who were in Appellants home taking items that belonged to Peggy Kandies, to include her clothes, coats, Levi jeans, kitchen items, oil paintings by Peggy Kandies, Jim Booth, Madlyn Carroll, Godey Prints that appellant had collected while living on Long Island, N.Y. along with antique kitchen tools.

They even took her American Flag off her house with wooden pole. There were several oil paintings that were painted by Peggy Kandies to include a Matador. Antique Carnival Glass, Cobalt glasses, cobalt oil lantern, her record albums, and 45 records. They damaged the 1952 Zenith TV, Radio combination, in mint condition in mahogany wood with doors.

They took all of appellants yard tools, drop cords, lawn mower, shovels, rake. Planters with plants and cast-iron stand on the front porch. Her clothes, western boots, guitars 3, one a famous singer.

There are pictures of the scene to include William Taylor.

William Taylor told Peggy Kandies that she had better not say anything or she would regret it, and he didn't have a Warrant nor any signed documents by a judge to Raid appellant Peggy Kandies home. She is not a criminal nor is she on any kind of drugs.

On another incident, Angela McJunkin of the City of North Charleston, went to Appellants home with a Chad Kulp who she said was a Fire Marshall to check the wiring for fire hazards, however, he was not a Fire Marshall, just an employee. Angela McJunkin had an illegal warrant document that was for companies that make chemicals. There was a man in green clothes that had **SWAT** on the back of his shirt, with his hand on his gun walking up on the driveway, unannounced.

Appellant inherited the 1.5 acre that attaches to a small piece close to Old University Blvd. making it prime property and she believes her property is being targeted by someone in the City of North Charleston.

Angela McJunkin has been harassing and threatening Appellant since NOV. 2012 when the illegal Mexican who sexually assaulted appellant on APRIL 20, 2010 and who was being paroled on Nov 30, 2012. It made worldwide news the story was in newspapers all over the world. A four-part series by The EXAMINER.

The connection is that the City of North Charleston is a Sanctuary City who hires illegals.

Tammie Emanuel who began this attack on Peggy Kandies in Nov 2012, who is married to Darbis Briggman who had Appellant's power and water turned off on Oct 5, 2021.

In the ORDER by the attorneys for City of North Charleston, they reference a case number 2021-CP-10-4350, that Appellant was unaware of nor was she ever served any documents concerning it. She had no knowledge of the case, and certainly would have responded had she known. That is a violation of the Code of Laws that Angela McJunkin should have to answer to and be sanctioned for.

That is a violation of Appellant's Civil Rights, and equal justice under, and by the law. Angela McJunkin deliberately denied Appellant the right to respond to the action that she filed in the Charleston County Court. Appellant researched the case after the attorneys referenced it. Appellant had filed for an Injunction against the City of North Charleston [after a person told her to in the legal profession] but didn't know that it would be associated with the case 4350. Further, Appellant recently had been researching the Charleston County Court Plus to find that case and see who did it, and it was Angela McJunkin. It is all coming to light now. as to who is involved in the long-term assault on Peggy Kandies, Appellant by the City of North Charleston.

In March of 2021, Appellant went to the ER at Trident Hospital and was referred to Robert Pringle and he did a Nuclear Stress Procedure on April 1, 2021, and diagnosed her with a mild Aorta Valve dysfunction and put her on medication for life. On April 07, 2021, a heart monitor was put on her for 10 days. He is still very concerned about the City of North Charleston's actions against the appellant.

The proper procedure for any Code Enforcement officer is to send a letter giving 15 days to correct a problem, however, the retaliation actions by City of North Charleston against Peggy Kandies, Appellant, has been going on since 2012 and she can name all of them and give details about all the code enforcement officers who took direction from Angela McLunkin, to include Sal Matas who gave Appellant a ticket for an address belonging to Peggy Smith who lives in North Charleston, stating Appellant owned it and she went to talk to the lady and by North Charleston with Appellants name on it.

There is more to include the tires being cut on Appellants Lexus RX300, her Ford van someone put sugar in the gas tank when Tammie Emanuel had told her Mexican friends or relatives wanted the van.

SLED told Appellant to file a police report about the raid and everything that's been going on. and She did.

Appellant exposed the fraud of City of North Charleston's grass ordinance, where they had been giving letters and tickets for 6 inches of grass when it's 1 foot, and when it was done to Appellant, she gave the judge a copy of the Ordinance after he said he wasn't familiar with the Ordinance, didn't know what it was. Appellant gave out 10 copies to defendants that day and Angela McLunkin and William Taylor retaliated against Peggy Kandies, Appellant and it's been a nightmare. Appellant with any conscience could not stand by and let that happen to anyone.

The harassment and the employees of Code Enforcement making fun of Appellant in court over her 1978 Ford Conversion Van with 3 different tickets from Bruce Meserve was one of the most disturbing actions, and Double Jeopardy. that Appellant had to endure.

Appellant can name all of them involved and what they've done to her to date.

j. Brady Hair retired as the city attorney because of corruption according to his uncle Hubert who told Appellant, "It's worse than you know". Appellant knows because she has been subjected to a lot of it.

Appellant respectfully requests that her Case 2024-000456 [2023-CP-10-1484] be Reinstated so that she can get justice and tell the Court all that she's been subjected to by the employees of the City of North Charleston.

Appellant reserves the right to add more evidence to the Court, and witness



Peggy Kandies
2499 Gable St
North Charleston, S.C.
29406
843-364-7003

September 20, 2024

J, Matthew Johnson
180 E. Bay Street- Suite 200
Charleston, S.C. 29401
843-577-5410

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

RECEIVED

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

SEP 26 2024

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Bentley Price, Circuit Court Judge

Case No. 2023-CP-10-1484

Appellant Case: 2024-0456

City of North Charleston

Respondent,

Vs

Peggy Kandies,

Appellant.

PROOF OF SERVICE

I certify that I have served the Amendment to the Motion To Reinstatement of Appeal on the South Carolina Court of Appeals, 1220 Senate Street, Columbia, South Carolina, 29401, on September 20, 2024, by e Filing to ctappfilings@sccourts.org, and a copy to be mailed on September 22, 2024, at the United States Postal Service, prepaid.

September 20, 2024

s/ Peggy Kandies

2499 Gable St.

North Charleston,

South Carolina 29406(843)-364-7003

Appellant

J. Matthew Johnson
180 E. Bay St.
Charleston, S.C. 29401
843-577-5410

**FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Bentley Price Circuit Court Judge

Case No. 2023-CP-10-1484

RECEIVED

SEP 26 2024

SC Court of Appeals

City of North Charleston Respondent,

v.

Peggy Kandies Appellant.

PROOF OF SERVICE

I certify that I have served the Amendment to Motion to Reinstate, Appeals Case No. 2024-0456 on The Charleston County Court, 100 Broad Street, suite 106, Charleston, S C., 29401 by depositing a copy at the United States Postal Service, prepaid on Monday, September 23, 2024.

September 22, 2024,

Peggy Kandies
2499 Gable St
Charleston,
South Carolina
29406(843)-364-7003
Appellant

J, Matthew Johnson
180 E. Bay St.
Charleston, S.C.
29401
843-577-5410

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

RECEIVED

Bentley Peice, Circuit Court Judge

SEP 26 2024

SC Court of Appeals

Case No. 2023-CP-10-1484

Appeals case- 24-0456

City of North Charleston

Respondent,

v.

Peggy Kandies,

Appellant.

PROOF OF SERVICE

I certify that I have served the Amendment to Motion to Reinstate Case No. 2024-0456 on City of North Charleston by sending by email to the attorney of record, J. Matthew Johnson, at, matt@chandlerdudgeon.com and depositing a copy of it in the United States Mail, postage prepaid, on September 23, 2024 at 180 E. Bay St., Charleston, S.C. 29401. 22, 2024.

September 22, 2024

Peggy Kandies
2499 Gable St.
North Charleston,
S.C. 843-364-7003
Appellant

J. Matthew Johnson
180 E. Bay St.
Charleston, S.C. 29401
843-577-5410

Peggy Kandies
2499 Gable St
North Charleston, S.C.

September 23, 2024

South Carolina Court of Appeals
1220 Senate Street
Columbia, S.C. 29401

RE: Amendment to Motion to Reinstate Case: 2024-456

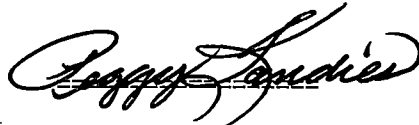
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SEP 26 2024
SC Court of Appeals

To the Clerk of Court,

I apologize for the error in my document at Case.: 2024- 0456. I'm not sure how that happened , however, I corrected it immediately. I am going to E filing it to you, and emailing to J. Matthew Johnson, Attorney for the City of North Charleston and will mail him a copy by U.S. Postal Service.

Thank you for your understanding.

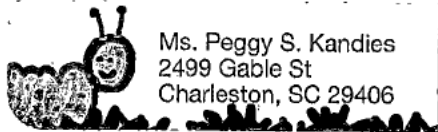
Best Regards,



Peggy Kandies

Appellant

843-364-7003



*South Carolina Court of Appeals
1220 Senate Street*

RECEIVED *Columbia, S.C.*

SEP 26 2024

SC Court of Appeals

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