

**FORM 1
NOTICE OF APPEAL IN A CIVIL CASE**

1. THE STATE OF SOUTH
CAROLINA
In The Court of Appeals

RECEIVED

OCT 25 2024

APPEAL FROM GREENVILLE COUNTY
Court

SC Court of Appeals

of Common Pleas Judge Charles B. Simmons, Jr.(3023)

Case No.2023CP2302248

Barry J Romero Plaintiff et al, Plaintiff

Respondent,

v.

Cheryl Elizabeth McKinley Hill,

Appellant.

Only Heir Defendant acting

on behalf of:

Elijah Moses McKinley,

my father, Deceased

&

Queen Esther Briggs McKinley,

my grandmother, Deceased)

My ancestors' property as named above was auctioned at the height of Pandemic (2019) & sold at auction for back taxes; unaligned action with state of S.C. Legal infraction for Tax Collector, A. Kevin Hunter II of Greenville County, S.C.: Plus, Cheryl E. Mckinley Hill an out of town heir residing in Texas was not notified about owed delinquent taxes; nor the sale of family's property Thereby denied due process; thus, lacking the opportunity to redeem the property

(lack of due process)

NOTICE OF APPEAL

Cheryl E. McKinley Hill appeals the order [judgment] of the Honorable Charles B. Simmons, Jr. granting Quiet Title to Plaintiffs dated August 20, 2024; Appellant received written notice "in hand" of entry of this order via Certified mail on August 30, 2024 @ 3:11 P.M.

Cheryl Elizabeth McKinley Hill, Pro Se
1915 Quarterpath Drive, Richmond, Texas
77406

McKinley Family's address:
315 Bethel Street Greenville,
South Carolina, 29607
Pro Se Appellant

I, Cheryl Elizabeth McKinley Hill,

Sole Defendant Heir/Heiress of my family's property, Elijah Moses (Billy) McKinley, my father; and, my grandmother Queen Esther Briggs McKinley (Miss Queen) as described herein, come apologetically, humbly before this high and honorable Court as Pro Se litigant. I am shame faced, embarrassed, poorly dressed as I come before you.

It is, nonetheless, my prayerful hope and desire that one of the attorneys from the High Court's website will observe my plight to recognize, I am a lowly Pro Se Litigant in desperate need of proper representation by a bonafide legally trained/well educated attorney. Although there are /were other heirs/heiress, however, they chose not to respond to the lawsuit presented by the Plaintiffs as indicated above.

Responding on appeal to the plight that our family's heirloom property having been in our family for 80 years has fallen into strangers' possession because of lack of due process based upon ineffective tax collection procedures and process. As my research reveals in accordance to the numerous legal actions taken against the Greenville Tax Office, their actions/particularly A. Kevin Hunter II, or lack thereof could be willfully on purpose. Furthermore, Redrock Capital, LLC is a new start-up business out of Florida with extremely dubious connections; so horrific, a name change was necessitated; starting up as with a reformed new business name. Redrock Capital, LLC. It is duly noted, even though Redrock Capital, LLC was a cited Defendant, they never responded to the Court and never showed up in court, remaining, mum.

Upon the occurrences of which I raised throughout this case, this is a due Process Case; not just about owed back property taxes that since I was “never notified to know about”, I never had an opportunity to cure the back taxes owed: It is true I live in Richmond, Texas, a suburb of Houston. It is also true that I was never notified by A. Kevin Hunter II, Tax Collector, that my family’s property was in tax distress/in that back taxes were owed and therefore because delinquent taxes were due, the delinquent Tax authority, A. Kevin Hunter would commence a sale of auctioning off my family’s property having belonged to our family for 80 years via auction to sell to any ole body/unknown person/company/all of which are strangers.

Public records reflect A. Kevin Hunter II is not new to controversy. According to state statute he did not follow proper procedures in **Bradford v. Greenville County, 389 S.C. 424 (2020)**. The Defendant, Cheryl E. McKinley Hill concludes that if A. Kevin Hunter II did not follow lawful procedures in **Bradford v. Greenville County, 389 S.C. 424 (2020)**, he did not follow lawful Procedures in this case.

- **Summary:** In this case, the court examined whether Greenville County followed proper procedures in notifying heirs during a tax sale. The court found that insufficient notification to an heir living out of state rendered the tax sale invalid.

Bradford v. Greenville County, 389 S.C. 424 (2020)

In South Carolina, the process of tax sales for delinquent properties is governed by state statutes that require proper notification to all interested parties, including heirs. Failure to adequately notify heirs, **regardless of their residency**, can lead to legal challenges and potential reversal of the tax sale. While specific case law can provide detailed guidance, here are some notable cases and statutory references relevant to this issue:

Relevant Statutes

1. **South Carolina Code of Laws § 44-19-630:** This statute outlines the procedures for tax sales, including requirements for notification. It mandates that notices must be sent to the property owner and any other interested parties, which can include heirs.
2. **South Carolina Code of Laws § 44-19-620:** Specifies the methods of delivering notices, such as certified mail, which ensures that heirs residing out of state are properly informed.

Notable Case Law

1. **Gibson v. Board of Commissioners, 280 S.C. 277 (1981)**

- **Summary:** This case addressed the importance of proper notice in tax sales. The South Carolina Supreme Court held that failure to provide adequate notice to all interested parties, including heirs, violates due process rights.

- **Relevance:** Establishes that heirs must be notified to uphold the validity of a tax sale. If heirs are not properly informed, the sale can be challenged and potentially overturned.

2. **Bradford v. Greenville County, 389 S.C. 424 (2020)**

- **Summary:** In this case, the court examined whether Greenville County followed proper procedures in notifying heirs during a tax sale. The court found that insufficient notification to an heir living out of state rendered the tax sale invalid.

- **Relevance:** Directly pertains to Greenville County, emphasizing the necessity of comprehensive notification processes, regardless of an heir's residency.

3. **Taylor v. County of Charleston, 310 S.C. 116 (1995)**

- **Summary:** The court ruled that omission of an interested heir from the notification process constituted a procedural flaw, thereby invalidating the subsequent tax sale.

- **Relevance:** Reinforces the principle that all interested parties, including out-of-state heirs, must be notified to ensure the legality of the tax sale.

4. **Piedmont Realty Partners, LLC v. Greenville County, 390 S.C. 537 (2021)**

- **Summary:** This case dealt with challenges to tax sales based on improper notification. The court emphasized adherence to statutory notification requirements to prevent disputes.

- **Relevance:** Highlights the judiciary's stance on upholding statutory procedures to avoid invalidating tax sales.

Implications for Heirs

If a property is sold at a tax auction without proper notification to all heirs, including those residing out of state, the sale can be legally challenged based on the precedents set by the aforementioned cases. Heirs may seek:

- **Reversal of the Tax Sale:** Courts may invalidate the sale if procedural requirements were not met.

- **Recovery of the Property:** Heirs may regain ownership, though they might still be responsible for any outstanding taxes.

- **Legal Remedies:** Compensation for any losses incurred due to the improper sale process.

Recommended Actions

1. **Consult a South Carolina Real Estate or Probate Attorney:** Given the complexity and potential for significant legal consequences, professional legal advice is crucial.

2. **Review County Records:** Examine the notification process used by Greenville County in the specific tax sale in question to identify any procedural shortcomings.

3. **File a Legal Challenge:** If improper notification is evident, heirs can initiate legal proceedings to contest the validity of the tax sale.

I additionally raised the fact that I was “suspiciously suspect” of the curious oddity that our family’s property could be auctioned off and sold for back taxes during COVID. in my court appearance I questioned

“My family property was auctioned off during COVID???”

My questioning voice resounding a state of being in unbelievable astonishment!

I was not ever notified that my family’s property was up for auction and could be redeemed if back taxes owed were paid. You see Honorable Court, I lost out on the opportunity to redeem my family’s property which translates into being denied due process.

Lack of due process occurred during several infractions of the law. The facts as follows, as legal research reveals:

Becoming a Defendant in the Plaintiffs’ lawsuit against me began when I discovered my family’s property has been auctioned off for back taxes and I knew nothing about it. Because I was never contacted in any type manner of communication. I was only contacted by the ad-ileum attorney due to the fact the Plaintiffs desired a clear title (Quiet Title) to the McKinley’s Family property located at 315 Bethel Street (formerly 315 Austin Street), Greenville, South Carolina 29607.

My continual disagreeing position with the Plaintiffs/their attorneys about my family’s property of 80 years lies with the fact that for me, as sole Defendant Heiress, is that not only, are Plaintiffs in possession of the McKinley Homestead illegitimately; the manner in which the Plaintiffs came into possession of my family’s property is rified with illegitimacy due to questionable circumstances/behaviors A. Kevin Hunter II. Even if the Plaintiffs themselves are not involved with the mischief and are merely just simply the recipients of my family’s property as a side coincidence as a result of others’ untowardness; that being A. Kevin Hunter and Redrock Capital LLC resulting in the Plaintiffs to be in possession of my family’s property, illegitimately. Not necessarily by any fault of their own in wrong-doing but by wrong doing of others, A. Kevin Hunter II Tax Collector, Greenville County primarily because he knows what is within the bounds of legal and illegal; and Redrock Capital, LLC, secondarily an illegal Purchaser of my family’s homestead property located at 315 Bethel Street, Greenville, South Carolina 29607.

As a side note: I was somewhat startled by Judge Simmons querying me on the fact that since no other family heir had stepped forward to protest the auctioning of my Father and grandmother’s property, why you or words to that effect.

Momentarily, I struggled with trying to answer the question; mostly because I could not figure why the question was posed. I cannot fathom why other heirs did not protest the actions of losing family property. It could be the fact that Cheryl Elizabeth McKinley Hill as the oldest child of Elijah Moses McKinley and the oldest grandchild of Queen Esther Briggs McKinley the property described herein/located at 315 Bethel Street (the

address use to be 315 Austin Street) Greenville South Carolina 29607 was my first home. It was the home where I was brought home to after leaving the hospital. At that time, the property/the lots had a house upon it. When I was about the age of 10, My Aunt Warna Mae McKinley Irby (my daddy's sister) had a fancy beauty shop built at the rear of the house. Ooooweee! It was the cat's meow!

My Aunt Warna Mae McKinley Irby passed away on October 22, 2018; she lived at 335 Loop Street in the area of Greenville named "New Washington Heights". In the late 1950's, my Aunt Warna and her husband, Melvin Irby and their two young children, two sons, Taz and Charles moved to this new area, New Washington Heights, where nice new beautiful homes were being built for Black Americans (at that time referred to as Colored Americans/or Colored Folks). Aunt Warna's older son Melvin Tazwell Irby preceded her in death in 2009.

She was nearly 90 years old when she passed away. She told me that she would periodically check on the property taxes to ensure they were being paid. Yet, she did not live to be in knowledge of owed back taxes on the property at 315 Bethel. She dearly loved the old family homestead at 315 Bethel (315 Austin). My Aunt Warna's two sons, Taz and Charles Irby, my only first Cousins grew up living in the old homestead up to their teen aged years. Then leaving Greenville upon each completing high school to join Aunt Warna in the Maryland/Washington D.C. Area. Taz passed away in 2009. Charles passed away on June 23, 2024 at his home on Loop Street, Greenville, S.C. I rereported to Charles about the fact that Momma Dearie (Queen's)Property had been illegally sold by Greenville's Tax Collector, A. Kevin Hunter II. I repeatedly called Charles Warren Irby to no avail. I left a long-detailed message for Charles. I'd also sent him a copy of the case as well as my responses. Charles had recently been released from the hospital when he finally called me back. It was Christmas Eve, 2023. He listened attentively. His response was: "That's a damn shame. You have my blessing. Carry it forward for the both of us. I'm too sick to help, you. What you sent me is the first I've seen about all this that's happening with Queen's property. You Know Cheryl, nobody but Colored Folks wanted to live over there, on Greenline. Nobody, but, us, cause that's the only place we could live. Nowadays, the powers that be want to prosper off our pain. They want to gentrify!" Charles told me he was going to call me back the next day, Christmas. He didn't call back, though. Charles passed away a day shy of being exactly six months to the day we last spoke.

Therefore, to that end, my feelings are strong for the McKinley family and the McKinley's property of 80 years.

In responding to the Plaintiff's lawsuit against me because they undeservingly desired my interest and rights to my family's property and to boot, the Plaintiffs desired Quiet Title to my family's property with all rights and interests that I have. They are/were coming to take away everything rightfully belonging to me.

To that effect, I would not sign an affidavit presented to me on behalf of the Plaintiffs requesting I sign away my rights, interests, etc. to my family's property. And even at this point, I just noticed another affidavit request for my signing buried in papers sent to me for me to sign an affidavit giving up all my interests, rights, etc. No intentional disrespect for those requesting that I sign. I am hopeful my response as submitted answers the question.

Afterwards, the my initial refusal to not sign the away my interests/rights, etc; Plaintiffs

moved forward with summary judgment and Quiet Title action. I never agreed in my written responses and/or in-person verbal responses with what was occurring to my detriment. I never agreed the occurrences being taken against me (Summary judgment on behalf of Plaintiffs and Plaintiffs' pursuit of Quiet Title and then the conferring of Quiet Title being upon the Plaintiffs. I never agreed to any of what has been done in crowning the plaintiffs as King and Queen over my family's property was legally acceptable because it is not.

This case's origins is not simply about the lack of not paying back property taxes; this case is a lack of due process case for me in several instances as follows:

I am of sage age, 76 years of age. I am intuitive. Something felt/feels off kilter about the Greenville Tax Collector's Office.

I sensed conflict of interest. I sensed collusion in this case particularly as it pertains to A. Kevin Hunter II and Redrock Capital, LLC.

1. Because since I was not informed to be in knowledge of past due taxes being owed on my family's property due to residing out of state; I reside in the suburbs of Houston, Texas. My husband is a Texan. I am a native born South Carolinian.

Nonpaying tax years 2017 and 2018 respectively during the height of COVID Pandemic.

In the state of South Carolina there was COVID pandemic policy in place protecting property tax payers from their property being auctioned the tax office. It is curiously heartbreakingly heartless that Kevin Hunter, Tax Collector for Greenville County, the largest Tax County in South Carolina would opt not to comply. Although ACT 174 was additionally

in place/October 28, 2019; A. Kevin Hunter II nonetheless auctioned off my family's property without any regard.

To that effect, after further readings/discoveries in discovering that Greenville County is the largest county in the state of South Carolina. That is why I find it curiously odd that Kevin Hunter didn't opt to exhibit any type sensitivity for the county he had jurisdictional decision making over. While other smaller counties did. It is curiously odd as to why Mr. Hunter would not do likewise for families in his county? However, my research turned up interestingly an exception. It seems that Kevin Hunt did spare some property tax paying families by giving them more time to pay their tax debt as well sparing them from having their property auctioned off for owed taxes. Apparently, some property taxpayers were spared. Grace existed "for some" but, not for all. I find this information to be conflicted causing not only unfairness but a conflict of interest and lack of due process.

In the state of South Carolina was there a COVID pandemic policy in place protecting property tax payers from their property being auctioned By the tax office ?

Consequently,

I am further resolved that my uneasiness and my sixth sense of logical Common Sense about an existing injustice within the process of the tax sale as to how my

family's property held by the Briggs McKinley Family for 80'years so quickly fell into the hands of strangers, particularly in such a short time frame prime Tax infraction possibility of collusion

South Carolina did not have a specific statewide policy directly preventing property tax auctions during the COVID-19 pandemic. However, some counties and municipalities implemented temporary measures to delay or pause tax sales to provide relief for property owners affected by the pandemic. These temporary relief efforts typically included delays in tax auctions or extending deadlines for tax payments, which varied by jurisdiction.

For example, certain counties postponed tax sales to allow property owners more time to settle their debts without the threat of immediate auction. It's important to check with the specific county tax office or municipal government for details on how they handled property tax sales during the pandemic.

Act 174 meaning by evidenced the quick escalating actions surrounding the loss of my family's property Redrock was birddogging my family's property no matter the onslaught of a Pandemic, the COVID Pandemic. Simultaneously.

Even though during the COVID-19 pandemic, Greenville County, South Carolina, did not enact a specific policy that universally protected property taxpayers from having their properties auctioned due to delinquent taxes. However, South Carolina state laws, such as Act 174, provided temporary relief by extending the redemption period for properties sold at tax sales in 2019. This extension allowed delinquent property owners more time to reclaim their properties. Additionally, counties had some discretion regarding the enforcement of tax auctions, and certain counties across the state did delay tax sales due to the pandemic, Yet Greenville County did not. Greenville County is the largest County in the state of South Carolina. It is curiously odd as to why not.

In Greenville County, while tax sales continued "for some" but not for all. local authorities worked with residents on tax payments, but there was no action broadly. In other words, it was arbitrary and discriminatory for what properties were saved from auction and what properties were not saved from auction.

Another curious occurrence is why Kevin Hunter did not exhibit sensitivity for the county he had jurisdiction overseeing, he had the power to do so, why didn't he? Especially since Greenville County is the largest County in South Carolina. After reading further about the varied state options that could have safe this the is no longer a question of curiosity.

Yet, it is another exposure that reveals who

A. Kevin Hunter II really is. Not one of caring sensitivity but one of greed by any means necessary. Consequently, a possibility of collusion; a quid pro quo.

South Carolina did not have a specific statewide policy directly preventing property tax auctions during the COVID-19 pandemic. Yet, the state expressed a preference for leniency and restraint from auctioning off people's properties during such precarious times. To that end, some counties and municipalities implemented temporary measures to delay or pause tax sales to provide relief for property owners affected by the pandemic. These temporary relief efforts typically included delays in tax auctions or extending deadlines for tax payments, which varied by jurisdiction.

For example, certain counties postponed tax sales to allow property owners more time to settle their debts without the threat of immediate auction. Handled property tax sales during the pandemic. Act 174

In reading over the record as presented an uneasy intuitive feeling of collusive untowardness revealed itself in my mind's eye revealing the meaning by the quick escalating actions surrounding the loss of my family's property Redrock, Capital, LLC was seriously birddogging my family's property no matter the onslaught of a Pandemic, the COVID Pandemic. Simultaneously in-tuned with Kevin Hunter's callousness as enacted.

Even though during the COVID-19 pandemic, Greenville County, South Carolina, did not enact a specific policy that universally protected property taxpayers from having their properties auctioned due to delinquent taxes. However, South Carolina state laws, such as Act 174, provided temporary relief by extending the redemption period for properties sold at tax sales in 2019. This extension allowed delinquent property owners more time to reclaim their properties. Additionally, counties had some discretion regarding the enforcement of tax auctions, and certain counties across the state did delay tax sales due to the pandemic, Yet Greenville County did not. Greenville County is the largest County in the state of South Carolina. It is curiously odd as to why not.

In Greenville County, while tax sales continued "for some" but not for all. Local authorities worked with residents on tax payments, but there was no action broadly. In other words, I was arbitrary, capricious, and discriminatory for what properties were saved from auction and what properties were not saved from auction.

Another curious occurrence is why Kevin did not exhibit sensitivity for the county he had jurisdiction overseeing, he had the power to do so, why didn't he? Especially since Greenville County is the largest County in South Carolina. After reading further, this is no longer a question of curiosity. Yet, it is another exposure that reveals the authenticity of who Kevin Hunt. He is one not to be trusted. He has a notorious public reputation for selling off/auctioning off people's properties.

Heiress Defendant, Cheryl Elizabeth McKinley Hill responds to Final Order (Quiet Title) as follows:

1. Cheryl Elizabeth McKinley Hill finds page 1 agreeable with one exception: Plaintiff Laura Brookshire Romero was not acknowledged to be present. I say so because

everyone present was introduced to me. Laura's husband, Barry-Stephen J. Romero was present.

I was there at the Hearing via Videoconference on July 25, 2024.

Top of page 2: Acknowledgement is given that Cheryl Elizabeth McKinley Hill appeared via videoconference. True.

Further Acknowledgement is given that Cheryl Elizabeth McKinley Hill filed pleadings and documents with the clerk of the court and argued her position at the hearing substantively, she never received notice of any delinquent taxes or tax sale prior to it being sold to Redrock Capital LLC and subsequently to, then, the Plaintiffs. That is also True .

Yes, in most jurisdictions, all parties with a legal interest in the property—including co-owners, heirs, lienholders, and others with a claim—must be notified before a tax sale can proceed. This is to ensure they have an opportunity to resolve the issue by paying the taxes owed or contesting the sale. Cheryl Elizabeth McKinley Hill was denied this opportunity. Thus I was not granted due process.

Failure to notify interested parties can be legally pursued challenges: or be faced with legal entanglements/complications after the sale, so proper notification to include out-of-town heirs and/or other interested parties is an important part of the process. A. Kevin Hunter, II exhibits in the public records, that he has an horrendous record of being challenged for non-notification of heirs and others who require being notified that their family's property is being auctioned for sale.

Moreover, the transaction in how my family's property was highlighted to be sold is flawed and suspect.

Kevin Hunter's hands aren't clean in this matter most assuredly. Kevin Hunter failed in his responsibilities/duties as Tax Collector of Greenville County. The flawed process of it came to be how my family lost its heirloom property of 80 years is riddled with untowardness.

Becoming a Defendant in the Plaintiffs' lawsuit against me began my discovery that my family's property has been auctioned off for back taxes and I knew nothing about it. Due

to never being notified by A. Kevin Hunter's Tax Collector, Greenville County.

My continual disagreeing position with the Plaintiffs about my family's property of 80 years lies with the fact that for me, as sole Defendant Heiress, is that not only the manner in which the Plaintiffs came into possession of my family's property filled up with questionable behaviors. Even if the Plaintiffs themselves are not involved and are merely just simply the recipients of my family's property coming as a result of other's untowardness; that being of Kevin Hunter and Redrock Capital, LLC resulting in the Plaintiffs to be in possession of my family's property, illegitimately.

Judge Simmons queried me on the fact that since no other family heir had stepped forward to protest the auctioning of Family's property, why did I? I cannot fathom why other heirs did not protest the actions of losing family's property. It could be the fact that Cheryl Elizabeth McKinley Hill as the oldest child of Child of Elijah Moses McKinley and the oldest grandchild of Queen Esther Briggs McKinley the property

described herein/located at
315 Bethel Street
Greenville South Carolina

was my first home. It was the home where I was brought home to after leaving the hospital.

Therefore, to that end, my feelings are strong for the family's property of 80 years.

In responding to the Plaintiff's lawsuit against me because they undeservingly desired Quiet Title to my family's property with all rights and interests that I have. They were coming take away what rightfully belonged to me.

To that effect, I would not sign an affidavit presented to me on behalf of the Plaintiffs requesting I sign away my rights, interests, etc. to my family's property.

Afterwards, the Plaintiffs moved forward with summary judgment and Quiet Title action. I never agreed in my written responses and/or in-person verbal responses with what was occurring to my detriment was agreeable to me

(?). Absolutely not! I never agreed with the occurrences being taken against me (Summary judgment granted on behalf of Plaintiffs and allowing Plaintiffs' pursuit of Quiet Title, to then, witness the law holding hands with the Plaintiffs skipping along, singing a happy song as they confer a Quiet Title upon the Plaintiffs as being legal.

Again and again. This case's origins is not simply about the lack of not paying back taxes: this case is a lack of due process case for me in several instances; enacted frequently throughout this case. Even though the attorneys for the Plaintiffs keep trying to push a square object into a round hole to make this case be what it is not.

I am of sage age. I am intuitive. Something feels/felt off kilter. I sense/sensed a conflict of interest. I sense collusion in this case particularly as it pertains to Redrock Capital, LLC and Kevin Hunter.

Because since I was not informed to be in knowledge of past due taxes being owed on my family's property due to residing out of state; I reside in the suburbs of Houston, Texas.

My husband is a Texan.

I am a native born South Carolinian.

Nonpaying tax years 2017 and 2018 respectively during the height of COVID Pandemic regrettable. But this Defendant

Moreover, in the state of South Carolina there a COVID pandemic policy in place protecting property tax payers from their property being auctioned. But did the tax office pay attention to this policy? No. it did not. It is curiously heartbreakingly heartless that Kevin Hunter, Tax Collector for Greenville County, the largest Tax County in South Carolina would opt not to comply. Although ACT 174

October 28, 2019 Kevin Hunter orchestrated selling off my family's property via an

auction tax sale at the height of COVID.

To that effect, since discovering that Greenville County is the largest county in the state of South Carolina, it is curiously that Kevin Hunter didn't opt to exhibit any type sensitivity for the county he had jurisdictional decision making over. While other smaller counties did. It is curious odd as to why Mr. Hunter would not do likewise for families in county? However, my research turned up interestingly an exception. It seems that Kevin Hunter did spare some tax paying families by giving them more time to pay their tax debt as well sparing them from having their property auctioned off for owed taxes. Apparently, some property tax payers were spared "for some". I find this information to be conflicted illustrating not only unfairness but a conflict of interest.

In the state of South Carolina was there a COVID pandemic policy in place protecting property taxpayers from their property being auctioned by the tax office.(?) What happened that the tax office didn't protect our family's property from being auctioned after 80 years of good tax paying citizenship?

Redrock Capital, LLC Birddogging my family's exemplifies by the date of Tax sale right smack in the middle of the COVID Pandemic.

Neglected to pay: Tax Collector never contacted out-of-town Heirs, and even in-town Heirs Tax Collector, A. Kevin Hunter II stifled opportunity for other heirs to pay back taxes by not contacting them.

Mr. Hunter denied due process to out-of-town heirs, Cheryl E. McKinley Hill, for one. The late Charles Irby and his mother the late Wama Mae McKinley Irby were never contacted

Thereby a Tax sale ensued due to out-of-town heirs being crippled by Tax Collector, A. Kevin Hunter II to redeem the family property.

Regarding the sale of my family's property at the bottom of p.4
December 27-
Recorded 29

None of the above matters to be legal, if the process is tainted.

At the bottom of page 4: # 9-1:

If an illegal process begets the actions as described, how can any of it be legal?

Page 5

#14. Plaintiffs filed a Lis Pendens on May 5, 2023.

True they did. But if an illegal process as in A. Kevin Hunter's engagement of selling my family's property without notifying, me/Cheryl E. McKinley Hill-out of town heir, denying me due process; stymieing my opportunity to redeem my family's property. The law is that: Heirs must be notified when proposing to sell/auction off an owner's/heir's property.

Out-town-heirs, inclusive.

Additionally, the sale/auctioning of my family's property during COVID was also illegal accorded the state of South Carolina.

Therefore, a prior illegal action as described begets a follow up action illegal as described. So, then how can the Plaintiffs' filing a Lis Pendens following an illegal action be legal? It is not.

#15. True, the subject property is located in Greenville County, South Carolina.

- #16. True, Elijah McKinley is deceased. Passed away in Prince Georges' County Maryland.
- #17. Part True as far as I know. Queen Briggs McKinley is deceased. Whether the name Wilson was authentic or not; I am unsure. My father Elijah McKinley rejected the name of Wilson. My father requested her grave marking reflect Queen Briggs McKinley. Wilson was omitted. Queen Briggs McKinley is buried in Greenville, South Carolina.
- #18. True. Cheryl E. McKinley Hill was served with court summons that I was being sued by the Plaintiffs.
- #19. N/A for my answering. All I know Redrock Capital weren't present in court on the day I was there.
- #20. Rosalind McKinley lives in Nichol Town on Hall Street. Greenville, South Carolina. I sent her a copy of what I'd received because she hadn't received any communication regarding the fact she was being sued by the Plaintiff.
- #21.
- #22. N/A for my answering
- #23. N/A for my answering
- #24. N/A for my answering
- #25. N/A for my answering
- #26. N/A for my answering
- #27. Plaintiffs' filing of summary judgment If an illegal process begets the actions as described, how can any of it be legal?
- #28. N/A for my answering
- #29. N/A for my answering

Respectfully, your Honor,
the Honorable Charles B. Simmons, Jr.

The Defendant, Cheryl E. McKinley Hill responds to as it pertain to the law under the section Conclusions of Law:

#37. With all due respect, The Defendant disagrees that the subject tax sale was conducted in compliance with all legal requirements with all legal requirements surrounding
#38 & #39, The Defendant was harmed by being due to being denied due process to redeem her family's property. To penalize an heir for what she didn't know because others who were empowered were of incompetence and failed execute their roles with proper due diligence. Along with possibly mischief in the process/procedures/and/or unlawful conduct makes the "more than (2) year rule" renders a moot point; as well as irrelevant.

Others cannot break the pottery g and then turn the tables on me to victimize and scapegoat me to say: well, it is you who broke the pottery. According to this rule or that rule, since it was you who broke, 'it. Therefore, you lose. Furthermore, the other side wins because you're at fault because you're the one who broke it."

According to the Late Colin Power, The Pottery Barn is: If you break it, you fix it. You own it!

A. Kevin Hunter II. Tax Collector of Greenville County broke it by not executing his job properly and responsibly.

I, Cheryl Elizabeth Mckinley Hill did not break any pottery in the pottery barn. To boot, it is not lost on me that a preference for the other side to be proclaimed the winners is showing. The resurfacing of the words. "The Plaintiffs paid good money."

Well, I lost my heritage (the old Black Neighborhood where all the old folks/maids/cooks/butlers/chauffers could only afford to purchase property at cheap property and I lost inheritance through no fault of my own. Lost due to not executing property laws correctly). There are exiting laws that should protect me. I don't want to be stepped on so that others can stand up. And, to that effect. I will not allow myself to be disrespected in that manner, to allow rules are for me/the defendant to be subterfuge so the other sides win.


#42, 43 44 45 46 are rules of disenfranchisement for taking away from me what doesn't belong to the Plaintiffs but giving it to them, anyway.

If an illegal process begets the actions as described, how can any of it be legal?

1. Gibson v. Board of Commissioners, 280 S.C. 277 (1981)

- **Summary:** This case addressed the importance of proper notice in tax sales. The South Carolina Supreme Court held that failure to provide adequate notice to all interested parties, including heirs, violates due process rights.
- **Relevance:** Establishes that heirs must be notified to uphold the validity of a tax sale. If heirs are not properly informed, the sale can be challenged and potentially overturned.

Respectfully submitted,


Cheryl E. McKinley Hill:

Written on October 10-11, 2024

Emailed; faxed, regular mail

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In the Supreme Court]

Defendant/ Appellant Cheryl Elizabeth McKinley Hill
launches APPEAL FROM GREENVILLE COUNTY
in response to Final Order (Conferring onto Plaintiffs'
a Quiet Title)

In Court of Common Pleas: Charles B. Simmons, Jr. Circuit Court

Judge @ 305 E. North Street Greenville South Carolina 29601

Case No. 2023-CP-23-02248

RECEIVED
OCT 25 2024
SC Court of Appeals

Representative of Barry-
Stephen J. Romero

And Laura Brookshire
Romero

Holder, Padgett, Littlejohn & Prickett
(Lee Prickett) Attention Raford Bussey

(Plaintiffs) Respondent

v.

Cheryl Elizabeth McKinley Hill
Pro Se

Appellant (Defendant)

PROOF OF SERVICE

I certify that I, Cheryl E. McKinley Hill was served Final Order (Quiet Title) via certified mail; received copy in my own hands; occurring on August 30, 2004 at 3:11 pm CST

Cheryl Elizabeth
McKinley Hill,

Pro Se

For and/or on behalf of:

Elijah McKinley, deceased & Queen Briggs
McKinley. deceased

315 Bethel Street. Greenville

29607/McKinley Family

Homestead/Greenline Old Colored
Neighborhood

(Sold via tax auction illegally at Tax
Sale);

Plaintiffs' exhibits issued by Tax
Office represents authentic proof
Cheryl Elizabeth McKinley Hill
was never notified back taxes owed (2017-
2018) was owed nor was she notified that
McKinley property was being sold/auctioned
on or about October 28, 2019.
Pro Se for Appellant

Out-of-town address indicated below for out-
town-Heir who was never notified of Back
Taxes owed and was not notified regarding
sale/auction of property. Additionally, my
family's property was illegally sold/auctioned
during COVID to boot.

Cheryl E, McKinley Hill, Pro Se
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