

B

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August 26, 2020

PERSONAL AND CONFIDENTIAL

Mr. Anthony Taylor
1549 Lily Avenue
Columbia, SC 29204

RECEIVED

NOV 08 2024

SC Court of Appeals

RE: Anthony Robert Taylor vs. State of South Carolina Office of Attorney General and Alan Wilson
Case No. 2020-CP-40-02482
Our File No. 2206499

Dear Mr. Taylor:

As you know, our office represents the State of South Carolina and Attorney General Wilson in this matter. Recently we learned that you filed responses to our motions and did not serve our offices with those documents, instead serving our client. This letter shall serve as our request that you refrain from any direct communications with our clients. We ask that you only communicate and serve us with documents and pleadings in this matter.

Enclosed herewith is a copy of Rule 5 of the South Carolina Rules of Civil Procedure. I would encourage you to review this and all the applicable rules to instruct you in the proper procedure for pursuing your lawsuit *pro se*.

Any time you file documents with the Richland County Clerk of Court, it is your responsibility to serve our office with a copy of such document. You may do so via first class mail, or if you use e-mail, we will be okay with that.

You did not serve a copy of the "Answer to Motion in Opposition to Motion to Strike" and "Answer and Motion in Opposition to Defendant Motion to Dismiss" that you recently filed with the Court upon us. The rules require that you serve all pleadings on all counsel of record in the case. In the future, we would respectfully ask that you follow the rules and communicate with our firm, as counsel for the State and the Attorney General. We also ask that you familiarize yourself with and follow the applicable rules.

Mr. Anthony Taylor
August 26, 2020
Page Two

If you have any questions or concerns about this, please do not hesitate to contact my office and I will be glad to discuss them with you.

Sincerely,

MONTGOMERY WILLARD, LLC

A handwritten signature in black ink, appearing to read "Michael H. Montgomery", with a long horizontal flourish extending to the right.

Michael H. Montgomery

cc: Harley Kirkland hkirkland@scag.gov

The South Carolina Court of Appeals

Anthony Robert Taylor, Appellant,

v.

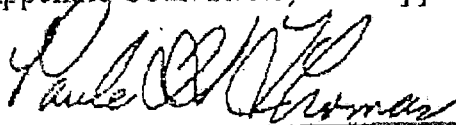
The State of South Carolina Office of Attorney General
Alan Wilson, Honorable Frank R. Addy, Jr., and
Attorney Jacqueline Marie Pavlicek, Respondents.

Appellate Case No. 2024-000922

ORDER

On May 30, 2024, Appellant filed a notice of appeal. According to the proof of service filed the same day, Appellant served W.M. Hemlepp with notice of the appeal. On June 11, 2024, Appellant filed a second proof of service, stating he served the notice of appeal on William Mike Hemlepp, Jr. On July 3, 2024, the State of South Carolina Office of Attorney General Alan Wilson and the Honorable Frank R. Addy, Jr., moved to dismiss this appeal because "Appellant neither served either of these [R]espondents nor their counsel within thirty days of receipt of the written order or judgment nor did [] Appellant file a proof of service . . . documenting service of his notice of appeal on these Respondents." Appellant filed a return, asserting he had served all counsel of record. According to the order on appeal, Attorney Hemlepp represented Respondent Pavlicek only. After careful consideration, we grant the motion to dismiss Respondents the South Carolina Office of Attorney General Alan Wilson and the Honorable Frank R. Addy, Jr., from this appeal. See Rule 203(b)(1), SCACR (stating that when a party appeals from the court of common pleas, the party shall serve the notice of appeal on all respondents within thirty days after receipt of written notice of entry of the order or judgment); Rule 203(d)(1)(B)(i), SCACR (explaining the notice of appeal filed with the appellate court must be accompanied by proof of service showing that the notice has been served on all respondents); Rule 262(c), SCACR ("Whenever under these Rules service is required or permitted to be made upon a party represented by an attorney the service shall be made upon the attorney unless service upon the party is ordered by the appellate court."); Rule 260(a), SCACR

(requiring dismissing of an appeal when an appellant fails to comply with the requirements of the South Carolina Appellate Court Rules). The appeal as to Respondent Pavlicek shall proceed.



FOR THE COURT

Columbia, South Carolina

cc:

Anthony R. Taylor
William Michael Hemlepp, Jr., Esquire
Michael H. Montgomery, Esquire

FILED
Aug 29 2024

SC judicial selection reform: Who's involved, what's at stake

BY JAVON L. HARRIS
jaharris@thestate.com

COLUMBIA, S.C.

As lawmakers mull over revamping how South Carolina selects state judges, here's a look at what's at stake, along with some of the key players and proposals under consideration.

Recently, a special House committee was formed to examine what some have classified as ongoing ills within the state's court system, namely the way state judges are select-

ed and reappointed. Currently, the Legislature controls the process, which critics say gives legislators, many of whom are also lawyers, an advantage in the courtroom. A judge who fears his job may be on the line in upsetting a lawyer-legislator may be swayed to rule in the lawmaker's favor.

The committee, so far, has heard testimony from several officials across the state, including South Carolina Supreme Court Associate Justice John Kittredge, Attorney General Alan Wilson and Solic-

itors David Pascoe and Kevin Brackett of the 1st and 16th Judicial Circuits, respectively.

Soon, the committee will consider testimony from the public. The committee is expected to release a report detailing its recommendations to the House in February.

The Legislature has had absolute authority to select judges in South Carolina for more than 280 years. In 1996, that authority was enhanced with the creation of the Judicial Merit Selection Commission, or JMSC — a 10-member body charged

with considering judicial candidates' qualifications. Candidates must first be found qualified by the commission before they can be considered by the full Legislature.

The commission is now made up of six legislators and four members of the public appointed by legislative leaders.

Now at stake is an opportunity for the General Assembly to revamp the judicial selection process by, in part, reconfiguring the JMSC by giving the executive

SEE ELECTION, 14A

Handwritten mark resembling a stylized 'X' or signature.

powerhouse. Is playing field unbalanced?

BY LOU BEZJAK, BRISTOW MARCHANT AND DWAYNE MCLEMORE

lbezjak@thestate.com
bmarchant@thestate.com
dmcmore@thestate.com

The moment was nearly nine years in the making.

A large crowd was on hand in January to see the Gray Colle-

giate Academy War Eagles basketball teams play in the school's new on-campus gymnasium in West Columbia. No more bus rides downtown to Allen University, where Gray played most of its home games since opening in 2014.

"It brings everything that we have been working toward for nine years, full force," Gray

Collegiate athletic director and football coach Adam Holmes said. "There is nothing that we don't have and can't work toward to get.

"Our academics is second to none. Now, we have a turf football and soccer stadium, state-of-the-art gym, baseball, softball fields on campus. Hopefully, this will elevate us even

ships. In the past 12 months, Gray also won state titles in softball and competitive cheer, and it won the 2021 football state title.

What once was a dream for Gray Collegiate was now reality. But for many of the high school teams that have had to play the War Eagles, the milestone of Gray adding new on-campus facilities might sound like more of a nightmare.

In their eyes, here is a burgeoning Goliath in athletics, a public charter school with advantages in attendance guidelines and whispers of recruiting

SEE POWERHOUSE, 8A

At least 27 prisoners granted sentence reductions since 2022

BY ZAK KOESKE
zkoeske@thestate.com

COLUMBIA, S.C.

South Carolina judges have signed off on sentence reductions for more than two-dozen inmates since January of last year, including three men con-

victed of murder, according to data compiled by the South Carolina Department of Corrections.

The information, provided to the governor's office earlier this week and shared Thursday with The State Media Co., was compiled in response to the recent early release Circuit Court

Judge Casey Manning granted convicted murderer Jeroid Price.

Price, also referred to as Jeroid Price, was quietly released in mid-March after serving 19 years of a 35-year murder sentence. His release followed a secret meeting between his defense attorney,

state Rep. Todd Rutherford, D-Richland, and 5th Circuit Solicitor Byron Gipson, that the South Carolina Supreme Court later voided.

The high court ordered that Price be returned to prison, but he has not complied with the order and is considered a fugitive whose whereabouts are unknown. The South Carolina Law Enforcement Division and Richland County Sheriff's Office this week offered a \$30,000 reward for informa-

SEE PRISONERS, 9A

After spending the previous night in a hotel, they were eager to get to the border - "to get in and go with the help of God and baby Jesus," Guevara said.

But when they arrived with just hours to go before the end of Title 42, a U.S. immigration officer said they could not pass.

"Not anymore, it's over," he told them in a firm voice, instructing them to go to bridges 10 miles to their left or right.

☉☉☉

María José Durán, a 24-year-old student from Venezuela, was on the verge of tears as she sat on a riverbank in Matamoros, Mexico.

Mexican immigration officials were trying to move migrants to an improvised camp and away from a spot where they could wade across the Rio Grande.

Durán said she dropped out of college when her parents could no longer afford it and set out for the U.S. with a group of friends and relatives. They crossed the treacherous Darien Gap dividing Colombia and Panama and then a half-dozen more countries before arriving at the U.S. border.

"I don't know what to think now, having made such a difficult journey to now find our-

SEE MIGRANTS, 6A



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Sunny, storms
85°/66° See 2A



FROM PAGE 1A

PRISONERS

tion that leads to his capture.

Price is one of at least 27 South Carolina inmates whose sentences were reduced by judicial order since 2022 and one of eight whose reductions resulted in their immediate release from prison, according to SCDC data.

Other inmates whose sentence reductions resulted in their immediate release include men charged with burglary, weapon and drug possession, DUI, drug trafficking, kidnapping, assault and battery and murder.

"This report highlights the need for tougher criminal penalties and confirms the General Assembly needs to act today to close the revolving door for violent offenders and crack down on career criminals and illegal guns," Brandon Charak, a spokesman for v. Henry McMaster,

said in a statement Thursday.

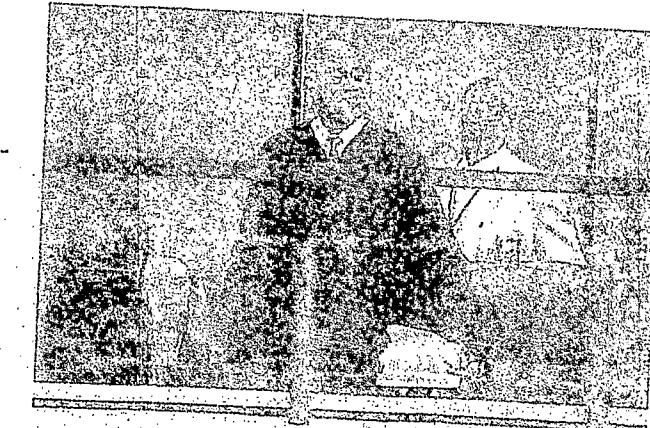
State lawmakers from both chambers are in the process of hashing out a compromise bond reform bill that seeks to punish people who commit violent crimes while out on bond awaiting trial on prior violent charges.

McMaster has asked lawmakers to pass the bill before the legislative session ends this year.

RELEASED EARLY

Nicholas Geer is the only convicted murderer besides Price whose recent sentence reduction resulted in his immediate release from prison. Geer was convicted of murder in Anderson County in 1995, and sentenced to life in prison. He was released last September on the order of Judge Letitia Verdin after serving 27 years.

Geer was 17 at the time



JOSHUA BOUCHER |jboucher@thestate.com

In this 2022 file photo, Judge Casey Manning hears arguments during a hearing in regards to sending a lawsuit over the state's six-week abortion ban to the Supreme Court.

of the offense, which stemmed from a "drug deal gone bad," according to the order granting his early release, and "likely would not have been prosecuted as a murder charge if the offense occurred today."

Three of the inmates granted early release last year had their sentences cut by 10 or more years, according to SCDC data:

◦ Alberto Lopez, con-

victed in 2009 of assault and battery with intent to kill and two counts of kidnapping, had his 30-year sentence reduced to 18 years and was released in March 2022.

◦ Joshua Taylor, sentenced to 20 years behind bars for assault and battery of a high and aggravated nature, was released last October after his sentence was effectively cut in half.

◦ And Dominique Garrison, sentenced to 20 years in prison for first-degree burglary, was released in April 2022 after being granted a 10-year sentence reduction.

Lopez, who also was represented by Rutherford, was granted a reduction after providing Department of Corrections police information that led to the arrest of a corrections officer on misconduct charges, records show. Judge Courtney Clyburn-Pope, the daughter of state Rep. William Clyburn, D-Aiken, signed off on the order.

Taylor, convicted by a Georgetown County jury in 2014, had his sentence reduced in exchange for testifying for the state in another case, records show. He was freed on the order of judge R. Ferrell Cothran.

Garrison also was granted a sentence reduction for sharing "useful" information with the state, records show. Horry County Solicitor Jimmy Richardson presented the order seeking Garrison's

early release and 15th Circuit Judge Benjamin Culbertson signed off on it.

More than a dozen different judges have signed off on sentence reduction orders since 2022, but none more often than Manning.

Manning, who signed the order freeing Price on Dec. 30, 2022, granted six other sentence reductions that same month, his last before retiring from the bench, according to SCDC data.

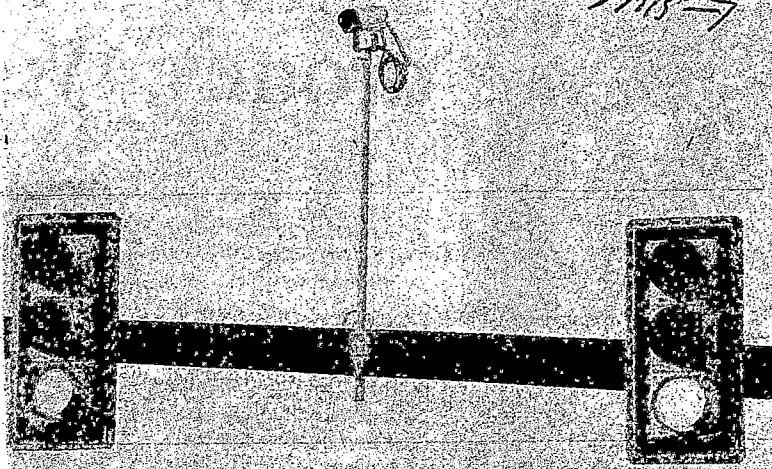
In total, Manning signed off on eight sentence reductions in 2022. No other judge signed off on more than three, according to SCDC data.

The early release of S.C. inmates has caused widespread consternation in the state's legal and law enforcement communities in recent weeks since Price's case became public, raising questions about the role of lawyers, judges and solicitors in the largely non-public process.

Zak Koeske: @ZakKoeske

F

USB →
This →



Carolina law. The petition argues that operating the ALPR program has stretched SLED's constitutional authority beyond legal meaning, to the point that it challenges the constitutional separation of powers in South Carolina.

"We're just trying to get the court to affirm this basic principle of administrative and constitutional law that an agency cannot exceed its enabling legislation," Hudson-Price said.

The petition does not dispute that SLED has a mandate to conduct criminal investigations or that the legislature has previously "passed dozens of laws authorizing SLED to operate specifically enumerated databases," including DNA databases.

But the filings argue that no statute or law has ever given SLED authority to "to engage in bulk data collection via the unregulated, widespread, and technology-fueled surveillance of individuals not suspected of any legal misconduct."

Lastly, the filings argue that as the ALPR program was essentially a new regulation, SLED should not be allowed to operate it because the agency did not submit it for public review as required by South Carolina's Administrative Procedures Act.

The process would require SLED to provide the public with notice and an opportunity to comment before putting the program in place.

This process is not alien to SLED. The agency's DNA database, uniform crime reporting standards and breathalyzer testing program were only put in place after a public "notice-and-comment" process, according to the petition.

TRACY GLANTZ tglantz@thestate.com

three different kinds of automatic license plate readers: fixed units that are mounted on a structure like a bridge or a pole, mobile units that are equipped on police vehicles, and portable units that can be moved between different locations.

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argue that South Carolina gives law enforcement too much access to the data with insufficient oversight: SLED's entire database, Back Office, is available to over 2,000 officers from 99 different law enforcement agencies, according to the petition.

SLED maintains that it possesses just five portable units attached to trailers and one mounted unit, according to a document included in the court filings. However, the agency disclosed that it collected ALPR data from 48 different agencies.

In its policy, included in court documents, SLED explicitly states that operation of ALPRs is to be limited to officers with specialized training and who had received credentials from SLED for access to the database.

Agencies are also required to maintain and regularly audit logs of requests made to Back Office.

THE LEGAL CASE

At the center of the case

the petition argues that SLED has violated well established standards of constitutional government, legislative oversight and administrative procedure.

"A sprawling and unauthorized government program circumvents the constitutional lawmaking process and undermines the separation of the executive and legislative powers," according to the petition. "If SLED is to operate a statewide ALPR surveillance program, then the elected representatives of the people must authorize it."

The Thursday filing — called a petition of original jurisdiction — seeks to have the case heard immediately in the Supreme Court. The plaintiffs argue that this step is necessary given that the ALPR program is "rapidly proliferating" and has the "potential to cause irreversible damage to both citizens and the state."

Across three causes of action, the plaintiffs allege that in operating the

Exhibit
B H

STATE OF SOUTH CAROLINA
COLUMBIA MUNICIPAL COURT

June 1, 2021

Anthony Robert Taylor
1549 Lilly Ave
Columbia, SC 29204

SUMMARY COURT SUMMONS

STATE VS.
CASE #(S)
OFFICER
AGENCY
CHARGE

Anthony Robert Taylor
20200610345427

ADVISEMENT OF RIGHTS ATTACHED

Canty, Dejha
Columbia Police Department
Trespassing / Entering premises after warning or refusing to
leave on request

Please be advised that the above referenced case(s) has been continued from its original trial date and is now scheduled to be heard on June 23, 2021 at 1:05 PM.

You are hereby summoned to appear in the Columbia Municipal Court, 811 Washington Street, Courtroom 1, Columbia, SC on that date. Please notify any witnesses you may have of the change in trial date.

HEREIN FAIL NOT, ON PAIN OF FORFEITING THE LAWFUL PENALTY IN SUCH CASES MADE AND PROVIDED.

Tracy Thomas
Tracy Thomas Court Clerk

Columbia Municipal Court
811 Washington Street
Columbia, SC 29201
Phone: 803-545-3127
Fax: 803-545-3193

Anthony Robert Taylor, 20200610345427, June 23, 2021 at 1:05 PM

would request all personal information on all officers?

all Defendants Name who case was dismissed by this officer?



Richland County Sheriff's Department

LEON L. LOTT, JR.
Sheriff

Anthony R. Taylor
1549 Lilly Avenue
Columbia, SC 29204

September 3, 2021

Re: Lt. Jackson Seard
Internal Affairs Prof. Std. Div.
Columbia Police Dept.

Dear Sir/Madam:

On 8/31/2021, this department received a civil paper from your office. Please find the enclosed Affidavit of Service/Non Service for the above reference case.

I am pleased to be of service and if my Department can assist you in the future, please call upon my Civil Process Division at (803) 576-3151.

Sincerely,

A handwritten signature in black ink, appearing to read 'Leon Lott', written in a cursive style.

Leon Lott
Richland County Sheriff

F+G

ANTHONY R. TAYLOR
1549 Lilly Avenue
COLUMBIA SOUTH CAROLINA 29204

ATT: CHIEF LEON LOTT
RICHLAND COUNTY SHERIFF'S DEPARTMENT
5623 TWO NOTCH ROAD
P. O. BOX 143
COLUMBIA, SOUTH CAROLINA 29223

RE: ANTHONY R. TAYLOR
Affiant
(EC2021-047)

COLUMBIA POLICE DEPT.
VS. Office of Professional
Standards

NOTICE OF PERSONAL SERVICE
Lt. Jackson Sheard, Internal Affairs
1 Justice Square Columbia, SC 29201

Mayor Stephen Benjamin
1737 Main Street Columbia, SC 29201

Chief Williams H. Holbrook
811 Washington Street,
1 Justice Square Columbia, SC 29201

Lt. Jackson Sheard, Internal Affairs
Professional Standards Division
Columbia Police Department
1 Justice Square, Columbia SC 29201

ATT: CHIEF LEON LOTT:

Please be advised that I would like for your office and/or agency to personally serve the Defendants on the above-named capital agency (COLUMBIA POLICE DEPARTMENT) at the above listed address, as a matter of law and under the proper Rules of Court in this legal matter. As this is the mailing address given by Lt. Jackson Sheard, Internal Affairs Professional Standards Division Columbia Police Department.

1. I would like for you to make a return of a proof-of-service upon me, showing that this has been personally served by one of your deputies out of your office or agency.
2. Please return to this address: Anthony R. Taylor (person) 1549 Lilly Avenue Columbia SC 29204

Your Legal Authority is very much appreciated.

SINCERELY,


Anthony R. Taylor, 1549 Lilly Avenue Columbia SC29204 cc file September 2021

**RICHLAND COUNTY SHERIFF'S DEPARTMENT
CIVIL PROCESS DIVISION
SERVICE REQUEST INFORMATION SHEET**

You are requested to provide, to the best of your ability as much information as possible. It is understood that all information may not be available to you. However, the more information you provide will assist us in the service of your papers. If the address you provide is an apartment complex please include the building and apartment number and if it's a gated community the (Gate code).

The Richland County Sheriff's Department can't provide any legal advice and does not do any research in locating the person you are trying to serve. If you have more than one address you wish us to attempt a service fee will be required for each address requested. We will make 4-5 attempts to serve your paper but if no contact is made we will return paper non-served.

Once your paper is logged in it will be assigned to a Deputy Sheriff who will attempt to complete service. Within 10 days (excluding weekends and holidays). It may take longer depending on the current volume of papers and any special instructions you have listed.

INFORMATION ON PERSON TO BE SERVED

Columbia Police Dept request
NAME Lt. Jackson Shepard, Internal Affairs

ADDRESS 1 Justice Square Columbia SC 29201

CITY, STATE, ZIP Columbia, SC, 29201

NICKNAME/ALIAS _____ SEX _____ RACE _____ HEIGHT _____ WEIGHT _____ EYE _____ HAIR _____

VEHICLE INFO. _____

Suggested time to serve papers _____

PHONE NUMBER (_____) _____ - _____

Comments/Additional Information _____

2021 SEP -1 AM 8:59

RCSD

RECEIVED

**RETURN INFORMATION - REQUIRED
(This is who the Proof of Service will be returned to)**

NAME Anthony R. Taylor

ADDRESS 1549 Lilly Avenue

CITY, STATE, ZIP Columbia, SC 29204

PHONE NUMBER (_____) _____ - _____

04012



SEP 07 2021

AFFIDAVIT OF SERVICE or NON-SERVICE

Date Entered: 09/01/2021
File Number: C202104012
DSS Number: 0
Foreign Case #: 20200310345427

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

Date _____

Plaintiff Anthony R. Taylor 1549 Lilly Avenue Columbia, SC 29204

Defendant(s) Lt. Jackson Sheard Internal Affairs Prof Std Div Columbia Police Department 1 Justice Square
Columbia, SC 29201

PERSONALLY APPEARED Before Me P. Wilkes, duty sworn says that he/she served, or attempts to serve, the following civil paper(s):

Affidavit

1

on the defendant.

Lt. JACKSON SHEARD, as follows:

By personally handing the process to the defendant at 1 Justice Square, Columbia, SC on 09/03/21 9:11 AM.

() By handing the process to _____ at _____, SC on _____, a person of suitable age and discretion then residing in the defendant's usual place of abode.

() By handing the process to _____, the registered corporate agent or officer of the company at _____, SC on _____ and leaving him/her a copy.

() WAS UNABLE to locate and serve the above process on the defendant, after diligent efforts by checking the City/Telephone Directory, and going to the address given for the defendant, and by questioning persons in the vicinity of the address. THE PROCESS IS RETURNED UNEXECUTED.

() COMMENTS: _____

Deponent knows the person served to be the defendant and Deponent is not a party to the action. SWORN TO Before me this

3 day of September 2021.

P. WILKES Deputy Sheriff, Richland County S# 1195

Kenneth Coleman

NOTARY PUBLIC FOR SOUTH CAROLINA KENNETH COLEMAN Notary Public, South Carolina My Commission Expires July 15, 2024 P.O. Box 143 Columbia, SC 29202

13. Do you Lt. Jackson Sheard Admit or Deny? That this is the final ruling of entire Columbia Police Department and corporate agencies.

Further Affiant Sayeth Naught...

Respectfully submitted,

Anthony R. Taylor 8/31/21

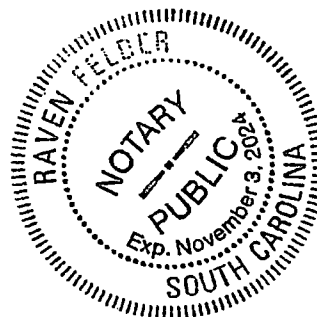
Anthony R. Taylor

1549 Lilly Avenue

Columbia, South Carolina 29204

SWORN OR AFFIRMED TO AND SUBSCRIBED

Before me this day 08/31/2021
Notary Public of South Carolina *Raven Felder*
My Commission expires 11/03/2024



INSTRUCTION

Pursuant to Rules 26, 33, 34, and 36 of The South Carolina Rules of Civil Procedure you are hereby required to answer under oath of perjury within 30 (thirty days), the following request for discovery to each Admit or Deny is a continual interrogatory so as to require you to file supplemental answers if you obtain further or different information between the time of your answers are serve and time for trial. You and your Agency has 30 days upon service to answer or the Affiant will move for Default judgment.

1. Do you Lt. Jackson Sheard, Admit or Deny? Police Officers cannot use excessive force on arrest or encounter.
2. Do you Lt., Jackson Sheard, Admit or Deny? Police Officers can not violate anyone civil Rights.
3. Do you Lt. Jackson Sheard Admit or Deny? Police cannot Racially profile individuals.
4. Do you Lt. Jackson Sheard Admit or Deny? Police officers must have probable cause or an arrest warrant to arrest a person or witness a crime being or about to be committed.
5. Do you Lt. Jackson Sheard Admit or Deny? Police officers cannot Falsely Arrest anyone.
6. Do you Lt Jackson Sheard Admit or Deny? Police Officers is not above the law and like all others must be punished if there is an injury party and complaint file.
7. Do you Lt. Jackson Sheard Admit or Deny? Police officers did not use physical force or body contact against (Anthony R. Taylor), God given free will and consent.
8. Do you Lt. Jackson Sheard Admit or Deny? That SC Trespassing is not considered a crime of criminal offense.
9. Do you Lt. Jackson Sheard Admit or Deny? Police officers did not commit illegal acts on and about November 18, 2020, 1326 Bush River Road Columbia, SC in the parking lot Walmart area.
10. Do you Lt. Jackson Sheard Admit or Deny? This incident (EC2021-047) did take place and charges filed against (Anthony Robert Taylor),
11. Do you Admit or Deny? That You speak for the entire Columbia Police Department and all governmental agencies in this case.
12. Do you Lt. Jackson Sheard Admit or Deny? Columbia Police Department denied (Anthony Robert Taylor) legal information for process off Arrest Warrant against these three (3) police officers?

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

COLUMBIA POLICE DEPARTMENT
Office of Professional Standards

Anthony Robert Taylor Affiant
1549 Lilly Ave Columbia, SC 29204

CASE# (S) 20200610345427

Stephen K. Benjamin, Mayor
1737 Nain Street Columbia SC 29201

William H. Holbrook, Chief of Police
City of Columbia South Carolina
1 Justice Square, Columbia, SC 29201

SWORN AFFIDAVIT OF FACTS
(EC2021-047)

Lt. Jackson Sheard
Internal Affairs Professional Standards Division
Columbia Police Department
1 Justice Square, Columbia, SC 29201

Personally appearing before me Affiant Anthony Robert Taylor, who first being duly sworn deposed and says:

1. That I am the Affiant in the captioned action and a resident of Richland County Columbia, South Carolina 29204, whose case was nolle pros June 23, 2021, Columbia Municipal Court 811 Washington Street, Courtroom 1, Columbia, SC. The complaint filed to be Unfounded by Lt. Jackson Sheard, Internal Affairs Professional Standards Division Columbia Police Department Etc. and AI. The Affiant objects to finding or ruling.
2. According to the rules of this court I submit this Sworn Affidavit of Facts upon (EC2021-047) in good faith.
3. To the best of my ability I truly believe under penalty of perjury that the foregoing is true and correct and not a frivolous issue.

Exhibit F

ANTHONY R. TAYLOR
1549 Lilly Avenue
COLUMBIA SOUTH CAROLINA 29204

ATT: CHIEF LEON LOTT
RICHLAND COUNTY SHERIFF'S DEPARTMENT
5623 TWO NOTCH ROAD
P. O. BOX 143
COLUMBIA, SOUTH CAROLINA 29223

RE: ANTHONY R. TAYLOR	COLUMBIA POLICE DEPT.	NOTICE OF PERSONAL SERVICE
Affiant	VS. Office of Professional	Lt. Jackson Sheard, Internal Affairs
(EC2021-047)	Standards	1 Justice Square Columbia, SC 29201

Mayor Stephen Benjamin
1737 Main Street Columbia, SC 29201

Chief Williams H. Holbrook
811 Washington Street,
1 Justice Square Columbia, SC 29201

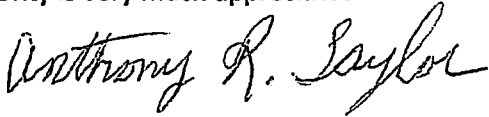
Lt. Jackson Sheard, Internal Affairs
Professional Standards Division
Columbia Police Department
1 Justice Square, Columbia SC 29201

ATT: CHIEF LEON LOTT:

Please be advised that I would like for your office and/or agency to personally serve the Defendants on the above-named capital agency (COLUMBIA POLICE DEPARTMENT) at the above listed address, as a matter of law and under the proper Rules of Court in this legal matter. As this is the mailing address given by Lt. Jackson Sheard, Internal Affairs Professional Standards Division Columbia Police Department.

1. I would like for you to make a return of a proof-of-service upon me, showing that this has been personally served by one of your deputies out of your office or agency.
2. Please return to this address: Anthony R. Taylor (person) 1549 Lilly Avenue Columbia SC 29204

Your Legal Authority is very much appreciated.

SINCERELY, 

Anthony R. Taylor, 1549 Lilly Avenue Columbia SC29204 cc file September 2021



Exhibit E

COLUMBIA POLICE DEPARTMENT
Office of Professional Standards

August 10, 2021

Mr. Anthony Taylor
1549 Lilly Avenue
Columbia, SC 29204

Mr. Taylor,

This letter is to inform you that the allegation of Excessive or Unnecessary Force in your complaint (EC2021-047) against Officer Canty submitted on June 23, 2021, has been thoroughly investigated and concluded. The allegations have been ruled:

- Sustained (The allegation is supported by sufficient evidence to indicate the allegation is true)
- Not Sustained (There is insufficient evidence to prove or disprove the allegation)
- Unfounded (The allegation is false or there is insufficient evidence to support the allegation)
- Exonerated (The act occurred, but the act was justified, lawful, and proper, or the complainant is satisfied with an explanation of the incident and requests no further action taken)

As always, The Columbia Police Department strives to investigate all complaints in a fair and impartial manner with no regards to race, religion, gender, or ethnic origin.

If you should have any question pertaining to this Internal Affairs investigation, please contact me at the below listed number.

Sincerely,

Lt. Jackson Sheard, Internal Affairs
Professional Standards Division
Columbia Police Department
1 Justice Square, Columbia, SC 29201
Office: (803) 545-3583
Fax: (803) 733-8252
Jackson.Sheard@Columbiasc.gov



ADMINISTRATIVE INVESTIGATION AFFIDAVIT CONTINUED

because you are making an mistake I have done nothing against
no body not have I broken any laws under South Carolina. After
the female officer put her cuffs on my left wrist trying her best
to flip me on my face, she then call out for another male officer
to come an assist her, he aided her call he was aggressive
as well, then I told this officer I am disable why are you all
handeling me with this physical abuse and unhuman treatment
I will not put my hand behind my back because of my physical
disability, I'm willing to go with you all willingly you all do not
have to assault me this way when I have done nothing against
no body or property. after a brief physical assault ~~between~~ between
that third officer him and him alone agreed with my request of
putting the cuff on my front. I was than place under arrest by
these officers place in the back seat, this female officer
charged me with this violation of trespassing. As have in
South Carolina Trespassing is in itself not a criminal offense.
Doing this physical assault upon my God free will these officers
~~are~~ acted with malice and criminal intent, there were no need
of any kind threat to the public safety, no call of violent
active to ring a red alarm that police assistance were every
needed. They held me against my free will, causing me great pain
do to the physical strains they put my disable body through. the officer
took me out the back-seat told another officer to go inside and get
a Walmart personal. This lady can out had a piece of paper in
her had she then gave me Notice to never again come on Walmart
property or any of the shopping that Walmart, Sam Club and other, without
informing why. I refuse to sign the paper but I took it from Walmart
worker for my record, but the ~~then~~ female officer took it from
my hand and keep it. This incident made no sense, I got the

ADMINISTRATIVE INVESTIGATION AFFIDAVIT CONTINUED

Q= Question posed by Investigating Officer

A= Answer provided

Name of Investigating Officer:

Name of Affiant: A. Taylor

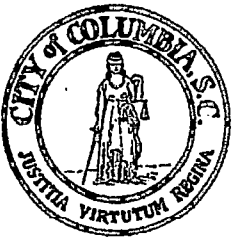
^{Sgt. C. De Baley}
word Nigger, Nigga, and the Colours on my personal property. At the Walmart some people were asking why I got Nigger on my truck, my dad some of the people was having open-mind conversation in a peaceful manner, while some others were in their own misunderstanding on how they see the word Niggers. For this reason to try and educate or enlighten others on the subject so that Niggers in America can be proud of who God created us, as children of God. He bless us as good. These officer who the City Police Department over the Court will give me the full name and status of these officers so that I could put them down by name. These officer has cause me great pain and suffering these are Criminal hiding behind uniform and the authority to legally infringe upon my God given rights of freedom. With this mind set and teaching of ~~the~~ white-supremacy and hate. With malice and Criminal intent these officers committed these illegal acts against or upon me knowing that police cannot use excessive force or arrest or encounter. These officer because of Nigger being on my truck, did attack me with Racially profile motive they violated my Civil Rights, committed Police brutality upon me falsely arrested me, without probable cause or arrest warrant, nor did any officer witness a crime that I committed. I was physical attack and assaulted by these officers just out of Hate for A Nigger. This is the bottom line I demand I be allow to take arrest warrant out on these officers. I did not infringe upon anybody rights at no time I ever visit 1326 Bush River Road for Walmart or the police to have infringed upon my freedom to shop in peace. Enough of this white Supremacy. This is the only officers name the female Canty, Dapha, Columbia, Police Department. Trespassing a no Criminal offense here in South Carolina.

Page 3 of 3

Affiant Initials: ART

1 Justice Square | Columbia, South Carolina 29201
Phone: 803-545-3500 Fax: 803-733-8252

Date: 6-24-21



CITY OF COLUMBIA

Columbia Police Department

Exhibit



ADMINISTRATIVE INVESTIGATION AFFIDAVIT

Internal Affairs File Number: EC2021- 047

Employee complainant Citizen complainant Witness Accused Employee

(Please print legibly)
Do not type into top section.

Affiant name is: Anthony Taylor

Affiant address is: 1549 Lilly Avenue, Columbia SC 29204

Affiant phone numbers are: Cell: 803 463 7725

I do hereby affirm that the information provided by me is true and complete to the best of my knowledge.

Anthony R. Taylor Jan 24
Affiant Signature Date

Sworn to and subscribed before me this:
24 Day of June, 2021
Sgt. C. D. BAILEY 20374

Notary Public for South Carolina

[Signature]

My Commission Expires: 13 Day of Jan, 2031.

Provide sufficient details of the events at issue. If you prefer to type this section, start typing to the right of the semi colon and delete the lines below. Do not type in top section:

on and about 11/18/20. 1326 Buck River Road, I visit the Carter Craft and Park finish shopping me and my wife. We purchase a TV I took the TV to my truck ahead of my wife. Just as I unload the TV and returning the shopping cart. I was then physically assaulted by two individuals in Columbia Police uniform with badge attacked me in a very very violent manner said you under arrest, you under arrest. As they tried to physically force my hand behind my back and they also tried to throw me to the ground face first. I tried to explain to these young officers I cannot put cuffs on with behind my back. I am willing to go with you, you can put the cuffs on my front and we can go where you want

Exhibit E

Columbia Municipal Court
CASE HISTORY FOR CASE 20200610345427

State of South Carolina vs Anthony Robert Taylor

FILED DATE: 11/30/2020
 INDICTMENT NUMBER:

CASE TYPE: CR

STATUS: Disposed

ASSIGNED JUDGE: Mangum, Jessica R.

DISPOSITION JUDGE: Bagby, Carlton Bruce

ARRESTING AGENCY: Columbia Police Department

CASE PARTIES:

Defendant Taylor, Anthony Robert
 1549 Lilly Ave, Columbia, SC 29204

Officer Canty, Dejha M
 #1 Justice Square, Columbia, SC 29201

CASE HISTORY FOR CASE 20200610345427

Taylor, Anthony Robert
 1549 Lilly Ave
 Columbia, SC 29204

Age: 69
 DL#: 4877505

DOB: 12/31/1951
 SSN: 250-88-4642

CHARGE	VIOL. DATE	DISPOSITION	DISP. DATE
1167 Trespassing / Entering premises after warning or refusing to leave on request	11/18/2020	Nolle Prosequi	6/23/2021

COST	ORIGINAL	BALANCE DUE	DISBURSED	PAY PRIORITY
Charge: Trespassing / Entering premises after warning or refusing to leave on				
Fine to General Fund	\$0.00	\$0.00	\$0.00	999
Victim Services Asm 38.0013% / 5.783	0.00	0.00	0.00	999
Victim Conviction Surcharge \$100 / \$21	0.00	0.00	0.00	999
Law Enforcement Funding Surcharge \$:	0.00	0.00	0.00	999
State Assessment	0.00	0.00	0.00	999
Total:	\$0.00	\$0.00	\$0.00	

DATE	TIME	EVENT DESCRIPTION
1/13/2021	8:00 AM	Court event: Criminal/Traffic Court
1/22/2021	12:00 AM	Filing recorded: Archived Document
6/23/2021	1:05 PM	Court event: Criminal/Traffic Rescheduled

UNIFORM TRAFFIC TICKET

STATE OF SOUTH CAROLINA

VERSUS

VIOLATOR

COUNTY OF COLUMBIA

VEHICLE

INCIDENT NO. 200029087

AGENCY/REPORTING OFFICER COLUMBIA POLICE DEPT

VIOLATOR'S NAME: MIDDLE NAME: ROBERT LAST NAME: TAYLOR

STREET: 1549 LILLY AVE CITY: COLUMBIA STATE: SC ZIP CODE: 29204

DRIVER'S LICENSE NO.: 004877505 CLASS: D EDL: YES NO

SEX: M BIRTH DATE: 12/31/1951 HGT: 72 WGT: 268 HAIR: GRY EYES: BRO

VEH. LIC. NO.: STATE: MAKE OF VEH.: YEAR: MOTOR VEH. ALTS. BODY ST. COLL. OR OTHER: OTHER: OTHER:

VEHICLE OWNER FIRST NAME: MIDDLE NAME: LAST NAME: OWNER STREET: CITY: STATE: ZIP CODE:

YOU ARE SUMMONED TO APPEAR BEFORE THE TRIAL COURT

TRIAL COURT: 40210 STREET: 811 WASHINGTON STREET COLUMBIA MUNICIPALITY CITY: COLUMBIA STATE: SC ZIP CODE: 29201

DATE OF TRIAL: 02/01/2021 TIME OF TRIAL: 09:00 AM

APPEARANCE REQUIRED: YES NO

PLAINT NO.: 020 POINTS: 1 B.A. LEVEL: 22

ADDRESS: 1326 BULLIVER RD COLUMBIA SC 29204

ARRESTING OFFICER: D M PTL OFFICER NUMBER: 803-6801

DATE OF ARREST: 11/18/2020 FINE AMOUNT REQUESTED:

NOTICE TO THE TRIAL COURT FROM THE ARRESTING OFFICER: EXACT TIME TO APPEAR IF THIS TICKET IS WRITTEN FOR A TRAFFIC VIOLATION, PENALTY OR NOLO CONTENDERE. THIS VIOLATION WILL BE FORWARDED TO YOUR HOME STATE. POINTS WILL BE ASSESSED BY YOUR HOME STATE LICENSING AUTHORITY. FAILURE TO COMPLY WITH THE TERMS OF THIS SUMMONS MAY RESULT IN THE SUSPENSION OF YOUR DRIVER'S LICENSE BY YOUR HOME STATE. YOU ARE REQUIRED BY LAW TO APPEAR IN COURT FOR CERTAIN OFFENSES. SEE IMPORTANT INFORMATION ON THE REVERSE SIDE OF THIS TICKET

VIOLATOR'S COPY TICKET # 20200610345427



Exhibit

NOTICE

THE PRIMARY AIM OF TRAFFIC LAW ENFORCEMENT IS TO REDUCE TRAFFIC ACCIDENTS, INJURIES AND DEATHS THROUGH FAIR, IMPARTIAL, AND REASONABLE ENFORCEMENT OF THE LAWS.

You must settle the case hereby made against you in one of the following ways:

- 1) You must appear in court at the appointed time with your South Carolina driver's license if indicated in the violation block on the front side of this summons.
- 2) You may post a cash bond with the appropriate trial court prior to the assigned date of trial. If you decide to mail in your bond rather than go to the office, MAIL MONEY ORDER, CASHIER'S CHECK OR CERTIFIED CHECK DIRECTLY TO THE TRIAL COURT OFFICE BEFORE WHOM YOU ARE SUMMONED TO APPEAR. The trial court name and address shown on the front side of this summons. DO NOT MAIL CASH OR PERSONAL CHECK. Be sure to enclose with the bond the arresting officer's name and the summons number.
- 3) If a court appearance is not mandatory, you may pay your fine online with a credit card for citations issued in participating counties. Go to <http://sc.gov/OnlineServices/Pages/CourtPayments.aspx> to determine if online payments are available in the county the citation was issued.
- 4) You may appear in court on the assigned date and time and have your trial concluded by the Trial Judge.

THE POSTING OF BOND BEFORE YOUR ASSIGNED TRIAL DATE IN NO WAY AFFECTS YOUR RIGHT TO HAVE A FAIR TRIAL BY THE JUDGE OR, IF YOU WANT A WRITTEN REQUEST FOR YOUR SCHEDULED TRIAL BY JURY.

However, if you are NOT required to appear in court on the assigned trial date and have previously bonded and on trial date, your bond may be forfeited unless the judge has agreed to have your case heard at another time.

If you fail to post bond or personally appear in court on the assigned trial date, you will be tried in your absence and, if convicted, you will be notified by the state's Motor Vehicle Division that your license will be suspended until you have cleared this matter with the Motor Vehicle Division. Additionally, a willful failure to appear or post bond is punishable as a separate offense with a fine of up to \$200.00 and imprisonment of up to 30 days.



Richland County Sheriff's Department

LEON L. LOTT, JR
Sheriff

Anthony Robert Taylor
1549 Lilly Avenue
Columbia, SC 29204

RECEIVED

NOV 08 2024
SC Court of Appeals

May 24, 2023

Re: Jacqueline M. Pavlicek

Dear Sir/Madam:

On 5/9/2023, this department received a civil paper from your office. Please find the enclosed Affidavit of Service/Non Service for the above reference case.

I am pleased to be of service and if my Department can assist you in the future, please call upon my Civil Process Division at (803) 576-3151.

Sincerely,

Leon Lott
Richland County Sheriff

MAY 10 2023



Richland County Sheriff's Department

AFFIDAVIT OF SERVICE or NON-SERVICE

Date Entered: 05/09/2023
File Number: C202303408
DSS Number: 0
Foreign Case #: 2023CP4002377

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

Date _____

Plaintiff Anthony Robert Taylor 1549 Lilly Avenue Columbia, SC 29204
Phone: (803)463-7725 Work:

Defendant(s) Jacqueline M. Pavlicek Office of City Attorney 1401 Main St. Columbia, SC 29201

PERSONALLY APPEARED Before Me P. Wilkes, duty sworn says that he/she served, or attempts to serve, the following civil paper(s):

Summons & Complaint 1
Motion 1
Notice 1

on the defendant, Jacqueline M. Pavlicek - office of city Attorney, as follows:

() By personally handing the process to the defendant at _____, SC on _____ (Date/Time)

() By handing the process to _____ at _____, SC on _____, a person of suitable age and discretion then residing in the defendant's usual place of abode.

(x) By handing the process to Kenya Bingham (Admin) the registered corporate agent or officer of the company at 1401 Main St, Columbia SC on 05/18/23 - 9:26 AM and leaving him/her a copy.

() WAS UNABLE to locate and serve the above process on the defendant, after diligent efforts by checking the City/Telephone Directory, and going to the address given for the defendant, and by questioning persons in the vicinity of the address. THE PROCESS IS RETURNED UNEXECUTED.

() COMMENTS: _____

Deponent knows the person served to be the defendant and Deponent is not a party to the action. SWORN TO Before me this

18 day of May 2023

P. Wilkes Deputy Sheriff, Richland County

P. WILKES S# 1195

Kenneth Coleman

KENNETH COLEMAN Notary Public, South Carolina My Commission Expires July 15, 2024

NOTARY PUBLIC FOR SOUTH CAROLINA MY COMMISSION EXPIRES P.O. Box 143 Columbia, SC 29201

**RICHLAND COUNTY SHERIFF'S DEPARTMENT
CIVIL PROCESS DIVISION
SERVICE REQUEST INFORMATION SHEET**

You are requested to provide; to the best of your ability as much information as possible. It is understood that all information may not be available to you. However, the more information you provide will assist us in the service of your papers. If the address you provide is an apartment complex please include the building and apartment number and if it's a gated community the (Gate code).

The Richland County Sheriff's Department can't provide any legal advice and does not do any research in locating the person you are trying to serve. If you have more than one address you wish us to attempt a service fee will be required for each address requested. We will make 4-5 attempts to serve your paper but if no contact is made we will return paper non-served.

Once your paper is logged in it will be assigned to a Deputy Sheriff who will attempt to complete service. Within 10 days (excluding weekends and holidays). It may take longer depending on the current volume of papers and any special instructions you have listed.

INFORMATION ON PERSON TO BE SERVED

NAME Jaqueline Marie Palkick Esquire/Office of City Attorney

ADDRESS 1401 Main Street

CITY, STATE/ZIP Columbia South Carolina 29201

NICKNAME/ALIAS _____ SEX _____ RACE _____ HEIGHT _____ WEIGHT _____ EYE _____ HAIR _____

VEHICLE INFO. _____

Suggested time to serve papers _____

PHONE NUMBER (_____) _____ - _____

Comments/Additional Information _____

**RETURN INFORMATION - REQUIRED
(This is who the Proof of Service will be returned to)**

NAME Anthony Robert Taylor

ADDRESS 1549 Lilly Avenue

CITY, STATE/ZIP Columbia, South Carolina 29204

PHONE NUMBER 803 1403 7725



Richland County Sheriff's Department

LEON L. LOTT, JR.
Sheriff

Anthony Robert Taylor
1549 Lilly Avenue
Columbia, SC 29204

May 16, 2023

Re: Frank Addy, Jr.

Dear Sir/Madam:

On 5/9/2023, this department received a civil paper from your office. Please find the enclosed Affidavit of Service/Non Service for the above reference case.

I am pleased to be of service and if my Department can assist you in the future, please call upon my Civil Process Division at (803) 576-3151.

Sincerely,

A handwritten signature in black ink, appearing to read "Leon Lott".

Leon Lott
Richland County Sheriff



Richland County Sheriff's Department

AFFIDAVIT OF SERVICE or NON-SERVICE

Date Entered: 05/09/2023
File Number: C202303410
DSS Number: 0
Foreign Case #: 2023CP4002377

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

Date

Plaintiff

Anthony Robert Taylor 1549 Lilly Avenue Columbia, SC 29204
Phone: (803)463-7725 Work:

Defendant(s)

Frank Addy, Jr. c/o Attorney General Office 1000 Assembly St. Columbia, SC 29201

PERSONALLY APPEARED Before Me [Signature: P. Wilkes], duty sworn says that he/she served, or attempt to serve, the following civil paper(s):

Summons & Complaint 1
Motion 1
Notice 1

on the defendant, FRANK Addy, JR. c/o Atty. Gen. office, as follows:

() By personally handing the process to the defendant at [Street] [City], SC on [Date/Time]

() By handing the process to [Name of Person Served/Relationship] at [Street], [City], SC on [Date/Time], a person of suitable age and discretion then residing in the defendant's usual place of abode.

(x) By handing the process to Stephanie Kennedy - Adm Asst. the registered corporate agent or officer of the company at 1000 Assembly St., Columbia, SC on 05/15/23-3:46 PM and leaving him/her a copy.

() WAS UNABLE to locate and serve the above process on the defendant, after diligent efforts by checking the City/Telephone Directory, and going to the address given for the defendant, and by questioning persons in the vicinity of the address. THE PROCESS IS RETURNED UNEXECUTED.

() COMMENTS:

Deponent knows the person served to be the defendant and Deponent is not a party to the action. SWORN TO Before me this

15 day of MAY, 2023

[Signature: P. Wilkes]
Deputy Sheriff, Richland County

P. WILKES
S# 1195

NOTARY PUBLIC FOR SOUTH CAROLINA
MY COMMISSION EXPIRES
P.O. Box 143 Columbia, SC 29202

Matthew S. Aul
Notary Public, State of South Carolina
My Comm. Expires July 11, 2032

**RICHLAND COUNTY SHERIFF'S DEPARTMENT
CIVIL PROCESS DIVISION
SERVICE REQUEST INFORMATION SHEET**

You are requested to provide, to the best of your ability as much information as possible. It is understood that all information may not be available to you. However, the more information you provide will assist us in the service of your papers. If the address you provide is an apartment complex please include the building and apartment number and if it's a gated community the (Gate code).

The Richland County Sheriff's Department can't provide any legal advice and does not do any research in locating the person you are trying to serve. If you have more than one address you wish us to attempt a service fee will be required for each address requested. We will make 4-5 attempts to serve your paper but if no contact is made we will return paper non-served.

Once your paper is logged in it will be assigned to a Deputy Sheriff who will attempt to complete service. Within 10 days (excluding weekends and holidays). It may take longer depending on the current volume of papers and any special instructions you have listed.

INFORMATION ON PERSON TO BE SERVED

NAME Honorable Frank Addy, Jr., 2159-Circuit 8, 528 Monument Street Suite 212 Greenwood, SC 29046
ADDRESS Post Office Box 11549 / 1000 Assembly Street, Col. 29201
CITY, STATE/ZIP Col. SC 29211

NICKNAME/ALIAS _____ SEX _____ RACE _____ HEIGHT _____ WEIGHT _____ EYE _____ HAIR _____

VEHICLE INFO. _____

Suggested time to serve papers _____

PHONE NUMBER (_____) _____

Comments/Additional Information _____

**RETURN INFORMATION - REQUIRED
(This is who the Proof of Service will be returned to)**

NAME Anthony Robert Taylor

ADDRESS 1549 Lilly Avenue

CITY, STATE/ZIP Col. SC 29204

PHONE NUMBER 803 3463 7725



LEON L. LOTT, JR.
Sheriff

Richland County Sheriff's Department

Anthony Robert Taylor
1549 Lilly Avenue
Columbia, SC 29204

May 16, 2023

Re: Alan Wilson

Dear Sir/Madam:

On 5/9/2023, this department received a civil paper from your office. Please find the enclosed Affidavit of Service/Non Service for the above reference case.

I am pleased to be of service and if my Department can assist you in the future, please call upon my Civil Process Division at (803) 576-3151.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Leon Lott'.

Leon Lott
Richland County Sheriff



AFFIDAVIT OF SERVICE or NON-SERVICE

Date Entered: 05/09/2023
File Number: C202303409
DSS Number: 0
Foreign Case #: 2023CP4002377

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

Date

Plaintiff

Anthony Robert Taylor 1549 Lilly Avenue Columbia, SC 29204
Phone: (803)463-7725 Work:

Defendant(s)

Alan Wilson SC Attorney General Office 1000 Assembly St. Columbia, SC 29201

PERSONALLY APPEARED Before Me P. Wilkes, duty sworn says that he/she served, or attempt to serve, the following civil paper(s):

Summons & Complaint 1
Motion 1
Notice 1

on the defendant, ALAN Wilson - SC Atty. Gen. office, as follows:

() By personally handing the process to the defendant at (Street) (City), SC on (Date/Time)

() By handing the process to (Name of Person Served/Relationship) at (Street) (City), SC on (Date/Time), a person of suitable age and discretion then residing in the defendant's usual place of abode.

By handing the process to Stephanie Kennedy Adm. Assst. the registered corporate agent or officer of the company at 1000 Assembly St. Columbia, SC on 05/15/23 - 3:46 PM and leaving him/her a copy.

() WAS UNABLE to locate and serve the above process on the defendant, after diligent efforts by checking the City/Telephone Directory, and going to the address given for the defendant, and by questioning persons in the vicinity of the address. THE PROCESS IS RETURNED UNEXECUTED.

() COMMENTS:

Deponent knows the person served to be the defendant and Deponent is not a party to the action. SWORN TO Before me this

15 day of MAY, 2023

P. WILKES
Deputy Sheriff, Richland County
S# 1195

NOTARY PUBLIC FOR SOUTH CAROLINA
MY COMMISSION EXPIRES
P.O. Box 143 Columbia, SC 29202

Matthew S. Aul
Notary Public, State of South Carolina
My Commission Expires July 11, 2032

**RICHLAND COUNTY SHERIFF'S DEPARTMENT
CIVIL PROCESS DIVISION
SERVICE REQUEST INFORMATION SHEET**

You are requested to provide, to the best of your ability as much information as possible. It is understood that all information may not be available to you. However, the more information you provide will assist us in the service of your papers. If the address you provide is an apartment complex please include the building and apartment number and if it's a gated community the (Gate code).

The Richland County Sheriff's Department can't provide any legal advice and does not do any research in locating the person you are trying to serve. If you have more than one address you wish us to attempt a service fee will be required for each address requested. We will make 4-5 attempts to serve your paper but if no contact is made we will return paper non-served.

Once your paper is logged in it will be assigned to a Deputy Sheriff who will attempt to complete service. Within 10 days (excluding weekends and holidays). It may take longer depending on the current volume of papers and any special instructions you have listed.

INFORMATION ON PERSON TO BE SERVED

NAME Alan Wilson Attorney General
ADDRESS 1000 Assembly Street
CITY, STATE/ZIP Columbia South Carolina
NICKNAME/ALIAS _____ SEX _____ RACE _____ HEIGHT _____ WEIGHT _____ EYE _____ HAIR _____
VEHICLE INFO. _____
Suggested time to serve papers _____
PHONE NUMBER (_____) _____
Comments/Additional Information _____

**RETURN INFORMATION - REQUIRED
(This is who the Proof of Service will be returned to)**

NAME Anthony Robert Taylor
ADDRESS 1549 Lilly Avenue
CITY, STATE/ZIP Columbia South Carolina 29204
PHONE NUMBER 803 1463-7725

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Anthony Robert Taylor

Plaintiff(s)

The State of SC, Brian Wilson

Judge Honorable Frank R. Addy Jr.

Attorney Jacqueline Marie Paulick

Defendant(s)

Submitted By:

Address: 1549 Lilly Ave
Columbia, SC 29204

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2023CP400-237
RECEIVED

NOV 08 2024

SC Bar #:

Telephone #:

Fax #:

Other:

E-mail:

SC Court of Appeals

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. This form is NOT required to be filed in E-Filed Cases.

DOCKETING INFORMATION (Check all that apply)

**If Action is Judgment/Settlement do not complete*

- JURY TRIAL** demanded in complaint. **NON-JURY TRIAL** demanded in complaint.
- This case is subject to **ARBITRATION** pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is subject to **MEDIATION** pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is exempt from ADR. (Certificate Attached)

NATURE OF ACTION (Check One Box Below)

- | | | | |
|--|---|--|--|
| <p>Contracts</p> <ul style="list-style-type: none"> <input type="checkbox"/> Constructions (100) <input type="checkbox"/> Debt Collection (110) <input type="checkbox"/> General (130) <input type="checkbox"/> Breach of Contract (140) <input type="checkbox"/> Fraud/Bad Faith (150) <input type="checkbox"/> Failure to Deliver/Warranty (160) <input type="checkbox"/> Employment Discrim (170) <input type="checkbox"/> Employment (180) <input type="checkbox"/> Other (199) <p>Inmate Petitions</p> <ul style="list-style-type: none"> <input type="checkbox"/> PCR (500) <input type="checkbox"/> Mandamus (520) <input type="checkbox"/> Habeas Corpus (530) <input type="checkbox"/> Other (599) | <p>Torts - Professional Malpractice</p> <ul style="list-style-type: none"> <input type="checkbox"/> Dental Malpractice (200) <input type="checkbox"/> Legal Malpractice (210) <input checked="" type="checkbox"/> Medical Malpractice (220) <input type="checkbox"/> Previous Notice of Intent Case # <u>20-NL-20</u> <input type="checkbox"/> Notice/ File Med Mal (230) <input type="checkbox"/> Other (299) <p>Administrative Law/Relief</p> <ul style="list-style-type: none"> <input type="checkbox"/> Reinstate Drv. License (800) <input type="checkbox"/> Judicial Review (810) <input type="checkbox"/> Relief (820) <input type="checkbox"/> Permanent Injunction (830) <input type="checkbox"/> Forfeiture-Petition (840) <input type="checkbox"/> Forfeiture-Consent Order (850) <input type="checkbox"/> Other (899) | <p>Torts - Personal Injury</p> <ul style="list-style-type: none"> <input type="checkbox"/> Conversion (310) <input type="checkbox"/> Motor Vehicle Accident (320) <input type="checkbox"/> Premises Liability (330) <input type="checkbox"/> Products Liability (340) <input type="checkbox"/> Personal Injury (350) <input type="checkbox"/> Wrongful Death (360) <input type="checkbox"/> Assault/Battery (370) <input type="checkbox"/> Slander/Libel (380) <input type="checkbox"/> Other (399) <p>Judgments/Settlements</p> <ul style="list-style-type: none"> <input type="checkbox"/> Death Settlement (700) <input type="checkbox"/> Foreign Judgment (710) <input type="checkbox"/> Magistrate's Judgment (720) <input type="checkbox"/> Minor Settlement (730) <input type="checkbox"/> Transcript Judgment (740) <input type="checkbox"/> Lis Pendens (750) <input type="checkbox"/> Transfer of Structured Settlement Payment Rights Application (760) <input type="checkbox"/> Confession of Judgment (770) <input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780) <input type="checkbox"/> Incapacitated Adult Settlement (790) <input type="checkbox"/> Other (799) | <p>Real Property</p> <ul style="list-style-type: none"> <input type="checkbox"/> Claim & Delivery (400) <input type="checkbox"/> Condemnation (410) <input type="checkbox"/> Foreclosure (420) <input type="checkbox"/> Mechanic's Lien (430) <input type="checkbox"/> Partition (440) <input type="checkbox"/> Possession (450) <input type="checkbox"/> Building Code Violation (460) <input type="checkbox"/> Other (499) <p>Appeals</p> <ul style="list-style-type: none"> <input type="checkbox"/> Arbitration (900) <input type="checkbox"/> Magistrate-Civil (910) <input type="checkbox"/> Magistrate-Criminal (920) <input type="checkbox"/> Municipal (930) <input type="checkbox"/> Probate Court (940) <input type="checkbox"/> SCDOT (950) <input type="checkbox"/> Worker's Comp (960) <input type="checkbox"/> Zoning Board (970) <input type="checkbox"/> Public-Service Comm. (990) <input type="checkbox"/> Employment Security Comm (991) <input type="checkbox"/> Other (999) |
|--|---|--|--|
- Special/Complex /Other**
- Environmental (600)
 - Automobile Arb. (610)
 - Medical (620)
 - Other (699)
 - Sexual Predator (510)
 - Permanent Restraining Order (680)
 - Interpleader (690)
 - Pharmaceuticals (630)
 - Unfair Trade Practices (640)
 - Out-of State Depositions (650)
 - Motion to Quash Subpoena in an Out-of-County Action (660)
 - Pre-Suit Discovery (670)
- Submitting Party Signature: Anthony R. Taylor
- Date: May 8, 2023

BENNETTE W. MARRIOTT
C.P., G.S., J.F.C.
MAY - 8 PM 2:00
FILED
RICHLAND COUNTY

2023CP400 2377

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE COURT OF COMMON PLEAS FOR
THE FIFTH JUDICIAL CIRCUIT

Anthony R. Taylor, Plaintiff, Pro Se
1549 Lilly Avenue
Columbia, South Carolina 29204
(803) 463-7725

Civil Action Number

v.

The State of South Carolina Office of Attorney General,
Alan Wilson
Post Office Box 11549
Columbia, South Carolina 29211

SUMMONS
(Jury Trial Demanded)

JENNIFER W. McBRIDE
P. G.S. & F.C.

2023 MAY -8 PM 2:00

RICHLAND COUNTY
FILED

Honorable Frank R. Addy, Jr. 2159 Circuit 8
528 Monument Street Suite 210
Greenwood, South Carolina 296461
Office (864) 943-8020, Fax- (864) 942-8581

Jacqueline Marie Pavlicek, Esq.
Office of The City Attorney
Post Office Box 667 Columbia, South Carolina 29202
(803) 737-4242, Fax (803) 737-4250
Defendants/Respondents

The Pro se Plaintiff, Anthony Robert Taylor, hereby serve and notice that you, Alan Wilson, State of South Carolina are the subject of a civil action complaint and that you and/or your agency have 30 (thirty) days in which to answer said complaint or the plaintiff will seek a default judgement for the relief sought in the complaint if you fail to so answer consistent with Rule 55 SCRPC. This complaint has been personally served upon you and all parties above.

You have been notified:

Attorney General, Alan Wilson of South Carolina
Post Office Box 11549 Columbia, South Carolina 29211

Dated this day _____, 2023.

Anthony R. Taylor Without Prejudice

Anthony Robert Taylor
1549 Lilly Avenue
Columbia, South Carolina 29204

Anthony R. Taylor

1549 Lilly Avenue

Columbia, South Carolina 29204

April 20, 2023

Jeanette W. McBride

Clerk of Court Richland County

Post Office Box 2766

Columbia, South Carolina 29202-2766

Dear Clerk,

Please find enclosed an original copy of the Affidavit of Facts, Complaint of Notice of Motion Hearing (Jury Trial Demanded), Summons (Jury Trial Demanded), and Certificate of Service (see exhibits) to be stamped, clocked, and filed in your court to complete proper service process. After being stamped, clocked, and filed please return a copy to me (Affiant) for my record.

Respectfully,

Anthony R. Taylor Without Prejudice

Anthony R. Taylor

1549 Lilly Avenue

Columbia, South Carolina 29204

Cc file

2023

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE COURT OF COMMON PLEAS FOR
THE FIFTH JUDICIAL CIRCUIT

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Columbia, South Carolina 29204
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Jacqueline Marie Pavlicek, Esq.
Office of The City Attorney
Post Office Box 667 Columbia, South Carolina 29202
(803) 737-4242, Fax (803) 737-4250
Defendants/Respondents

COMPLAINT
NOTICE OF MOTION HEARING
(Jury Trial Demanded)

2023 MAY -8 P 2:00
JEANETTE V. MCBRIDE
C.C.P. G.S. § 17-2 C.

RICHLAND COUNTY
FILED

Now move I, Anthony Robert Taylor, Pro Se Plaintiff (a God creation free conscious a, flesh, and blood man), am a resident at 1549 Lilly Avenue Columbia, South Carolina 29204 under the jurisdiction of the state of South Carolina and of Richland County. The Defendants/ Respondents: South Carolina Attorney General Alan Wilson, Post Office Box 11549 Columbia, South Carolina 29211, Honorable Judge Frank R. Addy, Jr., 2159 Circuit 8, 528 Monument Street Suite 210 Greenwood, South Carolina 296461, (Office- (864) 943-8020), (Fax- (864) 942-8581) and Jacqueline Marie Pavlicek, Esq. Office of The City Attorney General, Post Office Box 667 Columbia, South Carolina 29202 (803) 737-4242, (Fax) (803) 737-4250.

Attorney General Alan Wilson, always material herein, the Chief Prosecutor of the Court of South Carolina in the jurisdiction of South Carolina Supreme Court Columbia, South Carolina 29211.

The Plaintiff files this complaint pursuant to Title 5-78-10 sq et.al. South Carolina Code of Law; South Carolina Code 16-3-910, 184. SC section; 371, Conspiracy, 16-17-410 Kidnapping, 5th, 13th, and 14th Amendments, Human Rights Article 4 and Article 15, God Nature, in addition to the Constitution's limits on government authority that which is included in the Constitution for the United States for America, the Honorable Bill of Rights, and the Constitution of the State of South Carolina.

The Plaintiff also relies upon the rights and defenses guaranteed under uniform commercial (code), common equity law, laws of admiralty and commercial liens and levies pursuant but not limited to Title 42 U.S.C.A. (Civil Rights) Title 18 U.S.C.A. (Criminal Codes), Title 28 U.S.C.A. (Civil Codes), to which the Attorney

General, Alan Wilson, Chief Prosecutor, you are bound by your sworn solemn binding Oath of Office to protect and defend the birthright of life and the liberty and freewill with consent for all individuals.

Whereas Plaintiff is a private flesh and blood man that has been violated and suffer great injuries. For it is your legal duty and responsibility to defend the Constitution for the United States, the Republic for which it stands, one nation under God with life and liberty for all. Here, Jacqueline Marie Pavlicek's frivolous motion to delay and deceive the court as well as Honorable Judge Frank R. Addy Jr. is at war with the constitution allowing collusion before his presence and court. It is well established in South Carolina that any governmental agency, judges and attorneys, who, under the color of any law, statute, ordinance, regulation, custom or usage of any state shall subject or cause to be subjected any individual within the jurisdiction of the United States to the deprivation of any rights, privileges or immunities secured by the Constitution of the United States, shall any such statute, ordinance, regulation, custom or usage of the United States to the contrary notwithstanding be liable for all injuries caused.

FACTS

This is a case of miscarriage of justice, obstruction of justice, breach of contract, separation of power, judicial and legislative corruption through the administration agency of the 5th Judicial Circuit secretly entering contract with judges, prosecutors, legislators paid attorneys/lawyers. Under this conspiracy of revised practice of their own law under South Carolina Rules of Civil Procedures allows judges and paid attorneys procedural tactic an advantage. By playing legal games of law, granting frivolous unlawful Motion of Dismissal over Meritorious Complaint. Without discussing the merits of the case is denying the Sixth Amendment litigate unalienable Birthright to life that is given by God-nature not by government under a democracy that is recognized, guaranteed, and cannot be denied or waived.

Here, the 5th Judicial Circuit and the State of South Carolina is operating unlawfully, illegally, and outside of the United States for America Constitution, 1787 Circa., South Carolina Constitution, the Honorable Bill of Rights and God-nature.

Here, the corruption of Attorney Jacqueline Marie Pavlicek, Esq. and the Honorable Judge Frank R. Addy, Jr. are both officers of the court who are bound by their solemn oaths to protect and defend the life and liberty of all individuals. The party injured in any action, in a lawsuit, in equity or other proceedings for

redress violation of said solemnly sworn binding oaths is perjury, being of bad faith doctrine and high treason. Not even democracy is above the law.

CONCLUSION

Due to the material facts and in support of these heinous, notorious acts of corruption, terrorism and injustices that are still being unlawfully practiced. Under secret procedures of process of law and the failure of Honorable Judge Frank R. Addy, Jr. not supporting or upholding the Judicial Machinery of the 5th Judicial Circuit Court he has failed to perform his Judicial Function.

Both Jacqueline Marie Pavlicek Esq. and Honorable Judge Frank R. Addy, Jr. played their own legal game. Revised rules created under secret procedure known only to the paid attorneys/lawyers, judges, prosecutors, and legislators are in breach their contract and sworn solemnly binding oaths to protect and to defend both the United States and South Carolina Constitutions, Honorable Bill of Rights and God-nature. Our court systems are supposed to be open and transparent, not this failure and hiding secret operations outside of the law. These secret backroom deals under South Carolina Rules of Civil Procedure process 12(b)(6) procedure matter cannot be above the law.

Attorney General Alan Wilson you are the Chief Prosecutor of the State of South Carolina, where your sworn solemn binding oath of office to protect all individuals from the injuries/harm by others where you have the authority to correct any miscarriage or obstruction of justice. This unlawful procedure secret under procedure law is a corruptly created practice of law and is illegal/unlawful.

Therefore, Attorney General Alan Wilson, I accept your solemn binding Oath of Office and as the Chief Prosecutor you have the power/authority to correct this miscarriage of justice and obstruction of justice in this procedural matter that is making a mockery out of the South Carolina Justice System.

There is no place under the South Carolina Justice System for secret procedural process and individual private practice of law known only to Judges, Attorneys/Lawyers, Prosecutors, Legislators and deny the same information to the Sixth Amendment litigates, deny due process of law or equal protection of law.

Respectfully submitted,

Anthony R. Taylor Without Prejudice

Anthony Robert Taylor

1549 Lilly Avenue

Columbia, South Carolina 29204

RELIEF

Anthony Robert Taylor, flesh and blood man, Declaration of Independence

The plaintiff now chooses to exercise that recognized constitutional unalienable Birthright of living life given by our creator, God-nature the right to self-governed and self-government to express our freewill and to form a new government for the protection of rights, well-being and the safety of our families and our communities.

Today, May 1, 2023, please observe, our country's politics are out of control. It is more dangerous than a nuclear atomic bomb and a group of mentally ill legislators, prosecutors, attorneys, et. al. conspires with democracy with a dangerous destructive method that is unfit for civilized people of God-nature creation. This action has become catastrophic and could end all living life of its existence.

We, the people, the God image, the God-like, the Dark, the Light, fear everyday of our living lives and for the wellbeing of our families. Many of the fears are catastrophically overwhelming. Not having a place to

call home or if you're in a home, not having money to pay the rent/mortgage, or to feed ourselves or our family, not having employment or income and even the fear of losing our jobs or living paycheck to paycheck. We are living under this hate and ignorance and violence generated under democracy, these black-on-black crimes, the crimes of white supremacist, and even race against race are but a few of our fears. We live under fear and control of all this contrary law, to be first profiled as guilty instead of innocent on the onset rather than proven innocent until guilty.

We, the people, have no representation of rights. We, the people, the God-nature, the dark, the light, the 1/8th % have no protection from the brutality, the violence, the killings by police, agents or police interfering in our private living life. We have no voice to protect us from the police military force of unlawful law under Statute of Procedure known only to judges, prosecutors, legislators, paid attorneys/lawyers, but denies all Sixth Amendment litigates access to the same information, denies Due Process of Law and denies equal protection under the law.

The Sixth Amendment litigate do not consent to this evil democracy but seeks his and his family, his nation of the God image, the God-like, the 1/8th % their exemption from this government because hate, secrets, racism, discrimination under procedure process of law. The Sixth Amendment litigate does seek exemption from all taxation, laws, regulations, et.al... We, the people, the God-nature, the dark, the light, the 1/8th % seek exemption from under the classification of the Black African American.

Because of the hate, the ignorance, the discrimination, the violence, the disrespectful terrorist acts that the White/Caucasian-America and other races have in their minds towards people of color (be it dark/light skin/complexion or 1/8th % of African descent) are living in fear. This democracy regime of warmongers/ combatants of war have hate for others who disagree with their violence, destruction, murdering/killing, unlawful arresting of people because of the dark color of their skin consequently killing the living life which is given by God-nature not democracy under government.

descendants, welcome all God-nature. We must have the maturity to admit when something is so popular, so powerful, and so committed that it has been proven to be corrupt. So, let's fix it and move on. Now, is the time for all symbols of racism to be removed. Necessity calls all God-image/God-like, dark/light, 1/8th% to seek separation from this violent form of taught-hate, discriminable disrespect under these police enforced military rule of force, terrorist regime of democracy. The blood thirst killings for profit by the political warmongers, the combatants of war and hate for the living life and death to all who choose to disagree with these violent destructive killings for profit under secret hiding behind unlawful South Carolina rules of Civil (SCRCP) practice of law contrary to their United States for America Constitution and/or South Carolina Constitution, the Honorable Bill of Rights and God-nature. For the call for true freedom, calls for We, the people, the God image, the God-like, the dark, the light, the 1/8th % are self-governed given from God-nature, not forced political military force. We consent not.

We have and will continue to stand up for that individual unalienable Birthright given to us by God-nature and not under this unlawful democracy we, the people, take this moment to express a need for a better, more humane means of living life. We, the people, the God image, the God-like, the dark, the light skinned/complexion will move in harmony and in peace with the non-violent Constitutional way that guarantees the unalienable Birthright to alter or abolish this form of government under Democracy. Because of the hate, the violence, ignorance, secrecy, and injustice under law, we are suffocated by the great danger we face every day of our lives! History of slavery under Democracy shows over 200 years of violent inhumane acts toward, We, the people, the God-nature, the 1/8th %.

This democracy has proven for the last 152 years war against the God-like/God image of the dark/light and 1/8th% has suffered violence and it's getting even more violent, more out of control, and more governmental corruption and wars. We, the people must find a place of peace and rest, a safer system within in which to live where we can live out our unalienable birthright of happiness given by our creator God-nature. This majority rule form of democracy forces its people to live as slaves of poverty by police

Democracy knows no other way of life or government. Democracy has proven that it was created for violence, hate, ignorance, slavery of others of a darker complexion and contrary law. As a free conscious living being, I, the plaintiff, find it necessary to seek a better and safer form of government for safety, protection, economic improvement, peace and wellbeing for myself, families and the 1/8th %. Under the secrecy of democracy that is operating off hate and ignorance for all God-nature created people of dark/light skinned/complexioned and the 1/8th% bloodline of Africa is living in fear and hiding in secret.

We the people seek an immediate end to this inhumane Act of 1871; this 152-year war is continuing still where the creation of this United States of America Constitutional Military De facto Government Democracy Majority rules and has ruled unlawfully and contrary to the United States for America Constitution 1781 Circa.

Democracy is a tyranny form of government that is operated in secret, teaching hate, discriminable racism, and ignorance toward God-nature's dark-skinned/complexioned people unlawful means military and police force of rule and control by procedure practice of unlawful statutory procedure law in secret. All the while, the system is designed to disadvantage and discriminate against we the people of color and 1/8th%. Equality under the law is paramount and mandatory.

The day of reckoning is upon us when we, as a people, must make a choice to use common sense. Do we continue to accept this abuse of justice, or this outreach of judicial and legislative corruption and disrespect? Or do we exercise our God-given unalienable birth-right to separate to form a system to protect our best interests to move with the spirit of God-nature to seek an immediate end to this political and social war of hate and ignorance that fuels the fire of racism (the birth-child of democracy) that rain down hate. The day of blindness, silence and fear we must face. We, the people, the God image, the God-like, the dark, the light, the 1/8th % say stop flying that red, white, and blue battle flag of 1871 that racism secretly hides behind; and start flying the flag of peace and love that God demanded. We, the slave

military, legislators, unlawful acts, and its unconstitutional ways. Democracy is an evil, disguised to be good. Yes, a real camouflage form of government that has no compassion for nothing but democracy's best interest and profit and goods. This is a very serious threat to the health and wellbeing of all living life. This system of evil must end for the good of us, we, the people. The God image/God-like, the dark, the light, and the descendants of slaves in this America, in the legal manner, under the constitution demand our freedom back from this iron rule of evil disguising as good. The time of separation is upon us and the time for the good of all humankind that we, the people, the light, the dark, the God image/God-like to stand up and live out our creed under the commandment by God-nature with living life, liberty, and happiness for all.

We demand what God-nature has preserved. We demand a better, healthier lifestyle, protection, economic improvement across the board for everyone, and the right to raise a family. We demand our freedom back, the freedom that God-nature has preserved. Democracy has had a long run, some 152 years of evil, wars, murders, hanging, killing, disrespecting, enslaving, lying, and stealing by the brutal hand of racism, hate, ignorance, secrecy, and the lack of concern for the living-life the spirit of us all. These are the characteristics of democracy. Democracy is a demon and like all evil demons they must be banished from our living-life for they are blood-thirsty unemotional, uncaring so-called leaders of the political world. Democracy is the true American Mafia, the organized legislative criminal element, the Mob, the Blueblood, the evil in our living life. So, We, the people, the God image, the God-like, the dark, the nothing and then we came light, seek a place under our only sun. To live our lives in freedom and under the commandment of God-nature who blessed us as good and gives us the commandment to love that brother like thy love thy self, not hate the brother, or kill the brother, not discriminate against the brother not the way that democracy rule and control with evil hiding in secret pretending to be just and fair and being the one camouflaging /disguising to be good. We, the people, the dark, the light, and the 1/8th% will not allow your evil to continue to lock/box or vote us out. We're exercising our unalienable Birthright of liberty under this

Republic for which it stands, one nation under God with living life, liberty and being as happy as we can be.

1. We seek exemption from under this mental illness of color and classification of the Black-African American, the White Caucasian American of hate and ignorance under Democracy.
2. We seek promises of freedom and compensation for a debt that was never fulfilled.
3. We seek the recognition for our slave-ancestor's name (the "N" word) to be placed in this America history with the greatest honor for the role that they played.
4. We seek an immediate compensation for 152 years of, war of 1871 White Supremacy under Democracy against the God image, the God-like, the dark, the light skinned/complexion and the 1/8th that Democracy labels the "inferior one's".
5. We seek our liberty, our freedom to live in the peace and harmony that we were promised by our slave ancestors who won their freedom after the Civil War 1760- 1763.
6. We seek the return of all personal properties unlawfully confiscated under indictment number 92GS-40-1613 violation, false imprisonment \$5,000,000 (five million) U.S. dollars per day, per occurrence, per officer, official, agent or representative involved plus 18% annual interest.
7. 96GS-40 10975 (nolle prosequi. 8-18-93) (Marijuana Third Offence (b)(2) Distribution and Possession with Intent (Ten (10) years plus twenty (20) years, cruel and unusual punishment as per Title 18 U.S.C.A.) 241 and 242, or definitions contained herein; \$2,000,000.00 (two million) U.S. Dollars per occurrence, per officer, official, agent, or representative involved.
8. EC2021-047) Appellate Case No. 2022-001712, unlawful arrest without a lawful correct and complete warrant \$2,000,000.00 (two million) U.S. dollars per occurrence, per officers, official, agent, or representative.
9. We seek that unalienable Birthright, that liberty of freedom and compensation for the injuries suffered under this secret war against God-nature and the creation. From the darkness came the blessing from God who demanded one God-nature, not this democracy and this evil system that it creates while disguising itself by playing the role of good.
10. We, the people, the God image, the God-like, the dark, the light, the 1/8th % exercise that unalienable Birthright of liberty preserved by God-nature with dominion over the land south, southwest, southeast, north, northeast, and west of Main Street Columbia, South Carolina. These geographical areas/locations for the re-establishing of a nation of people in America that has been prosecuted, condemned to life under poverty, the new slave masters, the political slave running

descendants, welcome all God-nature. We must have the maturity to admit when something is so popular, so powerful, and so committed that it has been proven to be corrupt. So, let's fix it and move on. Now, is the time for all symbols of racism to be removed. Necessity calls all God-image/God-like, dark/light, 1/3th% to seek separation from this violent form of taught-hate, discriminable disrespect under these police enforced military rule of force, terrorist regime of democracy. The blood thirst killings for profit by the political warmongers, the combatants of war and hate for the living life and death to all who choose to disagree with these violent destructive killings for profit under secret hiding behind unlawful South Carolina rules of Civil (SCRCP) practice of law contrary to their United States for America Constitution and/or South Carolina Constitution, the Honorable Bill of Rights and God-nature. For the call for true freedom, calls for We, the people, the God image, the God-like, the dark, the light, the 1/8th % are self-governed given from God-nature, not forced political military force. We consent not.

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The day of reckoning is upon us when we, as a people, must make a choice to use common sense. Do we continue to accept this abuse of justice, or this outreach of judicial and legislative corruption and disrespect? Or do we exercise our God-given unalienable birth-right to separate to form a system to protect our best interests to move with the spirit of God-nature to seek an immediate end to this political and social war of hate and ignorance that fuels the fire of racism (the birth-child of democracy) that rain down hate. The day of blindness, silence and fear we must face. We, the people, the God image, the God-like, the dark, the light, the 1/8th % say stop flying that red, white, and blue battle flag of 1871 that racism secretly hides behind; and start flying the flag of peace and love that God demanded. We, the slave

military, legislators, unlawful acts, and its unconstitutional ways. Democracy is an evil, disguised to be good. Yes, a real camouflage form of government that has no compassion for nothing but democracy's best interest and profit and goods. This is a very serious threat to the health and wellbeing of all living life. This system of evil must end for the good of us, we, the people. The God image/God-like, the dark, the light, and the descendants of slaves in this America, in the legal manner, under the constitution demand our freedom back from this iron rule of evil disguising as good. The time of separation is upon us and the time for the good of all humankind that we, the people, the light, the dark, the God image/God-like to stand up and live out our creed under the commandment by God-nature with living life, liberty, and happiness for all.

We demand what God-nature has preserved. We demand a better, healthier lifestyle, protection, economic improvement across the board for everyone, and the right to raise a family. We demand our freedom back, the freedom that God-nature has preserved. Democracy has had a long run, some 152 years of evil, wars, murders, hanging, killing, disrespecting, enslaving, lying, and stealing by the brutal hand of racism, hate, ignorance, secrecy, and the lack of concern for the living-life the spirit of us all. These are the characteristics of democracy. Democracy is a demon and like all evil demons they must be banished from our living-life for they are blood-thirsty unemotional, uncaring so-called leaders of the political world. Democracy is the true American Mafia, the organized legislative criminal element, the Mob, the Blueblood, the evil in our living life. So, We, the people, the God image, the God-like, the dark, the nothing and then we came light, seek a place under our only sun. To live our lives in freedom and under the commandment of God-nature who blessed us as good and gives us the commandment to love that brother like thy love thy self, not hate the brother, or kill the brother, not discriminate against the brother not the way that democracy rule and control with evil hiding in secret pretending to be just and fair and being the one camouflaging /disguising to be good. We, the people, the dark, the light, and the 1/8th% will not allow your evil to continue to lock/box or vote us out. We're exercising our unalienable Birthright of liberty under this

Republic for which it stands, one nation under God with living life, liberty and being as happy as we can be.

1. We seek exemption from under this mental illness of color and classification of the Black-African American, the White Caucasian American of hate and ignorance under Democracy.
2. We seek promises of freedom and compensation for a debt that was never fulfilled.
3. We seek the recognition for our slave-ancestor's name (the "N" word) to be placed in this America history with the greatest honor for the role that they played.
4. We seek an immediate compensation for 152 years of, war of 1871 White Supremacy under Democracy against the God image, the God-like, the dark, the light skinned/complexion and the 1/8th% that Democracy labels the "inferior ones".
5. We seek our liberty, our freedom to live in the peace and harmony that we were promised by our slave ancestors who won their freedom after the Civil War 1760- 1763.
6. We seek the return of all personal properties unlawfully confiscated under indictment number 92GS-40-1613 violation, false imprisonment \$5,000,000 (five million) U.S. dollars per day, per occurrence, per officer, official, agent or representative involved plus 18% annual interest.
7. 96GS-40 10975 (nolle prosequi. 8-18-93) (Marijuana Third Offence (b)(2) Distribution and Possession with Intent (Ten (10) years plus twenty (20) years, cruel and unusual punishment as per Title 18 U.S.C.A.) 241 and 242, or definitions contained herein; \$2,000,000.00 (two million) U.S. Dollars per occurrence, per officer, official, agent, or representative involved.
8. EC2021-047) Appellate Case No. 2022-001712, unlawful arrest without a lawful correct and complete warrant \$2,000,000.00 (two million) U.S. dollars per occurrence, per officers, official, agent, or representative.
9. We seek that unalienable Birthright, that liberty of freedom and compensation for the injuries suffered under this secret war against God-nature and the creation. From the darkness came the blessing from God who demanded one God-nature, not this democracy and this evil system that it creates while disguising itself by playing the role of good.
10. We, the people, the God image, the God-like, the dark, the light, the 1/8th % exercise that unalienable Birthright of liberty preserved by God-nature with dominion over the land south, southwest, southeast, north, northeast, and west of Main Street Columbia, South Carolina. These geographical areas/locations for the re-establishing of a nation of people in America that has been prosecuted, condemned to life under poverty, the new slave masters, the political slave running

elections every 1, 2, 4, or 6 times a year voting democracy in, when slavery in all its form, is unlawful and illegal. God-nature common sense proved this system is wrong. Even modern-day slavery is prohibited and no statutory procedure, secret processes, no backroom deals are going to work. We are walking with God-nature, and we do not consent to this form of government under democracy (de facto).

Respectfully submitted,

Anthony R. Taylor Without Prejudice

Anthony Robert Taylor

1549 Lilly Avenue

Columbia, South Carolina 29204

Cc file

5/7/23

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE COURT OF COMMON PLEAS FOR THE
FIFTH JUDICIAL CIRCUIT

Anthony Robert Taylor pro se

VS

CASE No.

The State of South Carolina Office of Attorney General,
Alan Wilson
Post Office Box 11549
Columbia, South Carolina 29211

Honorable Frank R. Addy, Jr. 2159 Circuit 8
528 Monument Street Suite 210
Greenwood, South Carolina 296461
Office (864) 943-8020, Fax- (864) 942-8581

Jacqueline Marie Pavlicek, Esq.
Office of The City Attorney
Post Office Box 667 Columbia, South Carolina 29202
(803) 737-4242, Fax (803) 737-4250

Defendants/Respondents

2023 MAY - 8 PM 2: 00
JEANE E. W. MCBRIDE
C.C.P., G.S., & F.C.
CERTIFICATE OF SERVICE
RICHLAND COUNTY
FILED

I hereby certify that on May 8, 2023, I caused the forgoing documents to be served upon the Clerk of Court using the United States Postal Service or personal delivery. I caused all parties to be served upon following First Class United States Certified Return Mail on the date indicated herein.

Documents served: Complaint of Notice of Motion Hearing (Jury Trial Demanded), Certificate of Service and Summons (Jury Trial Demanded).

Party/Parties Served: The State of South Carolina Office of Attorney General, Alan Wilson Post Office Box 11549 Columbia, South Carolina 29211 Honorable Frank R. Addy, Jr. 2159 Circuit 8 528 Monument Street Suite 210 Greenwood, South Carolina 296461, Jacqueline Marie Pavlicek (SC 100556) Attorney (Defendant's) PO Box 667 Columbia, South Carolina 29202.

Respectfully submitted

Anthony R. Taylor Without Prejudice

Anthony R. Taylor
1549 Lilly Avenue
Columbia, South Carolina

Cc File
May 8, 2023

ANTHONY R. TAYLOR
1549 Lilly Avenue
COLUMBIA SOUTH CAROLINA 29204

ATT: CHIEF LEON LOTT
RICHLAND COUNTY SHERIFF'S DEPARTMENT
5623 TWO NOTCH ROAD
P. O. BOX 143
COLUMBIA, SOUTH CAROLINA 29223

RE: ANTHONY R. TAYLOR
Affiant

Office of the State of South Carolina
Attorney General

VS.

The State of South Carolina Office of Attorney General,
Alan Wilson
Post Office Box 11549
Columbia, South Carolina 29211

NOTICE OF PERSONAL SERVICE

Honorable Frank R. Addy, Jr. 2159 Circuit 8
528 Monument Street Suite 210
Greenwood, South Carolina 296461
Office-(864) 943-8020, Fax- (864) 9428581

Jacqueline Marie Pavlicek, Esq.
Office of The City Attorney
Post Office Box 667 Columbia, South Carolina 29202

ATT: CHIEF LEON LOTT:

Please be advised that I would like for your office and/or agency to personally serve the Defendants on the above-named capital agency (Office of the Attorney General of South Carolina) at the above listed address, as a matter of law and under the proper Rules of Court in this legal matter.

1. I would like you to make a return of proof-of-service upon me, showing that this has been personally served by one of your deputies out of your office or agency.

2. Please return to this address: Anthony R. Taylor (person) 1549 Lilly Avenue Columbia SC 29204

Your Legal Authority is very much appreciated.

SINCERELY,

Anthony R. Taylor, 1549 Lilly Avenue Columbia South Carolina 29204 cc file April 2023

Anthony R. Taylor

1549 Lilly Avenue

Columbia, South Carolina 29204

April 20, 2023

Jeanette W. McBride

Clerk of Court Richland County

Post Office Box 2766

Columbia, South Carolina 29202-2766

Dear Clerk,

Please find enclosed an original copy of Affiant, Affidavit of Facts and Certificate of Service to be stamped, clocked, and filed in your court to complete proper service process. After being stamped, clocked, and filed please return a copy to me (Affiant) for my record.

Respectfully,

Anthony R. Taylor, Without Prejudice

Anthony R. Taylor

1549 Lilly Avenue

Columbia, South Carolina 29204

Cc file

2023

**STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND**

) **ALAN WILSON OF THE STATE OF SOUTH**
) **CAROLINA**
) **OFFICE OF THE ATTORNEY GENERAL**

Anthony R. Taylor, Affiant
1549 Lilly Avenue
Columbia, South Carolina 29204

)
) Post Office Box 11549
) Columbia, South Carolina 29211
)

v.

) **Civil Action**

Defendants:
The State of South Carolina Office of Attorney General,
Alan Wilson
Post Office Box 11549
Columbia, South Carolina 29211

) **SWORN AFFIDAVIT OF FACTS**
)
)
)
)

Honorable Frank R. Addy, Jr. 2159 Circuit 8
528 Monument Street Suite 210
Greenwood, South Carolina 296461
Office-(864) 943-8020, Fax- (864) 9428581

Jacqueline Marie Pavlicek, Esq.
Office of The City Attorney
Post Office Box 667 Columbia, South Carolina 29202

Personally, appearing before me, the Affiant, Anthony R. Taylor, who first being duly sworn deposed and says:

1. That I am the Affiant in captioned action and a resident of Richland County in Columbia, South Carolina 29204
2. Where Remittitur was sent March 20, 2023, from the South Carolina Court of Appeals.
Jenny Abbott Kitchings; Clerk, V. Claire Allen, Chief Deputy Clerk
Post Office Box 11629 Columbia, South Carolina, 29211/1220 Senate Street Columbia, South Carolina 29211, ect.al.
3. The Affiant objects to the findings and/or ruling by the court.

4. Affiant accepts your sworn Oath of Office, your responsibility and duty to protect his guaranteed recognized Constitutional Unalienable Rights against domestic, foreign, or bureaucratic Tranny Government.
5. To the best of my ability, I truly say under penalty of perjury that the foregoing is true and factual and that the record will reflect the same substantive material facts.
6. Accordingly, to the Rules of Court, Affiant, submit this Affidavit of Facts in good faith, (2022-001712). All admissions are yes or no questions and answers.

Instructions

Pursuant to the rules, 26, 33, 34 and 36 of the South Carolina Rules of Civil Procedures, you and your agency are Hereby, required to answer under Oath of Office and penalty of perjury, within thirty (30) days. The following request for discovery to each admission yes or no is a continual interrogatory to require you file supplemental answers. If you obtain further or different information between the time of your answers and/or response or service and time for trial, you and your agency have thirty (30) days upon service to answer or the affiant will move for a Default Judgement.

1. Attorney General, Alan Wilson, do you admit yes or no that the United States for America Constitution, 1787, Circa, is the supreme law of the land 2023?
2. Attorney General, Alan Wilson, do you admit yes or no that the United States for America Constitution, 1787 Circa is a contract?
3. Attorney General, Alan Wilson, do you admit yes or no that the United States for America is a Republic union of all states?
4. Attorney General, Alan Wilson, do you admit yes or no that the United States for America is a three (3) branch government (Executive Branch, Legislative Branch and Judicial Branch)?
5. Attorney General, Alan Wilson, do you admit yes or no that the United States of America is a de facto government?

guaranteed unalienable right from mundane and dilatory tactics and impropriety or any influence of impropriety?

15. Attorney General, Alan Wilson, do you admit yes or no that the Honorable Frank R. Addy, Jr. is at war against the United States for America Constitution, South Carolina Constitution, Honorable Bill of Rights and Nature God and breach of their contract?
16. Attorney General, Alan Wilson, do you admit yes or no that the Honorable Frank R. Addy, Jr and Attorney Jacqueline M. Pavlicek, Esq. are officers of the court who are bound by their Sworn Oath of Office to protect all individual's rights under the United States for America Constitution 1787 Circa, and/or South Carolina Constitution Honorable Bill of Rights and Nature God and breach of their contract?
17. Attorney General, Alan Wilson, do you admit yes or no that the Honorable Frank R. Addy, Jr. lacked jurisdiction of that court?
18. Attorney General, Alan Wilson, do you admit yes or no that the Honorable Frank R. Addy, Jr. did not support or upheld the Judicial Machinery of the court?
19. Attorney General, Alan Wilson, do you admit yes or no that the Honorable Frank R. Addy, Jr. did not perform his judicial function?
20. Attorney General, Alan Wilson, do you admit yes or no that Attorney Jacqueline M. Pavlicek, Esq. has dishonored her sworn Oath of Office with perjury, obstruction of justice and breach of contract?
21. Attorney General, Alan Wilson, do you admit yes or no that both Attorney Jacqueline M. Pavlicek, Esq. and the Honorable Frank R. Addy, Jr. played their own legal game, revised rules created by secret procedure between paid attorneys and judges in breach of their contract and/or sworn oath?

6. Attorney General, Alan Wilson, do you admit yes or no that the United States of America Constitutional Government is a de Jury government?
7. Attorney General, Alan Wilson, do you admit yes or no that democracy is a military force of government?
8. Attorney General, Alan Wilson, do you admit yes or no that the United States of America Constitution under Democracy is at war against the Supreme Law of the Land under the United States for America Constitution and/or Honorable Bill of Rights and Nature of God?
9. Attorney General, Alan Wilson, do you admit yes or no that this legislative democracy secretly operating within this Constitutional Republic is an act of treason, criminal intent, and breach of contract?
10. Attorney General, Alan Wilson, do you admit yes or no that the Law Makers were never given authority or power to control the behaviors of We the People?
11. Attorney General, Alan Wilson, do you admit yes or no that Law Makers were given the authority and power by the people to legislate codes, rules, regulations, and procedures of law to control the behaviors of the bureaucratise, elected and appointed officials; municipalities, agencies and agents, etc.al.?
12. Attorney General, Alan Wilson, do you admit yes or no that everyone has the right to alter or abolish any government that fails to protect their best interest and free will to form a government of their own to protect their interests, safety, and welfare?
13. Attorney General, Alan Wilson, do you admit yes or no that everyone has the free choice and will to choose their own nationality?
14. Attorney General, Alan Wilson, do you admit yes or no that the Honorable Frank R. Addy, Jr. has dishonored his sworn Oath of Office to protect the Constitution's

22. Attorney General, Alan Wilson, do you admit yes or no that both Attorney Jacqueline M. Pavlicek, Esq. and the Honorable Frank R. Addy, Jr. are two (2) corrupted members of this corrupted Fifth Judicial Circuit practice of collusion under law?
23. Attorney General, Alan Wilson, do you admit yes or no that both Jacqueline M. Pavlicek, Esq and the Honorable Frank R. Addy, Jr agreement to join each other has created a criminal act of conspiracy and obstruction of justice and a breach of their contract?
24. Attorney General, Alan Wilson, do you admit yes or no that there cannot be any explanation or justification?
25. Attorney General, Alan Wilson, do you admit yes or no that your given sworn Oath of Office to protect all individual rights against all tranny government, foreign, domestic and bureaucratise?
26. Attorney General, Alan Wilson, do you admit yes or no that it's your duty as well as your responsibility as Chief Prosecutor of the State of South Carolina to protect all individual's rights from illegal practice of law?
27. Attorney General, Alan Wilson, do you admit yes or no that a fraud in a case can be raised at any time?
28. Attorney General, Alan Wilson, do you admit yes or no that Legislative Statutes enforced upon the people in the name of the law are fraud?
29. Attorney General, Alan Wilson, do you admit yes or no that the Order of Dismissal signed by the Honorable Frank R. Addy, Jr. is a violation of Federal and State(s) Law a fraud as well as obstruction of justice and a breach of their contract?
30. Further Affiant sayeth naught.

Respectfully Submitted,

Anthony R. Taylor, Without Prejudice

Anthony R. Taylor

1549 Lilly Avenue

Columbia, South Carolina 29204

Sworn or Affirmed to and Subscribed before me this 24 day of this 2023 year.

[Signature]

Notary Public of South Carolina



My Commission Expires August 7, 2024

My Commission expires

**STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND**

Anthony R. Taylor, Affiant
1549 Lilly Avenue
Columbia, South Carolina 29204

v.

Defendants:
The State of South Carolina Office of Attorney General,
Alan Wilson
Post Office Box 11549
Columbia, South Carolina 29211

Honorable Frank R. Addy, Jr. 2159 Circuit 8
528 Monument Street Suite 210
Greenwood, South Carolina 296461
Office-(864) 943-8020, Fax- (864) 9428581

Jacqueline Marie Pavlicek, Esq.
Office of The City Attorney
Post Office Box 667 Columbia, South Carolina 29202

**ALAN WILSON OF THE STATE OF SOUTH
CAROLINA
OFFICE OF THE ATTORNEY GENERAL**

Post Office Box 11549
Columbia, South Carolina 29211

Civil Action

CERTIFICATE OF SERVICE

1. I am the Affiant in the above captioned action.
2. Regular communication by mail exists throughout the State of South Carolina and that this a proper circumstance of Service by mail and/or hand delivery.
3. Have this day _____ served copies upon the court in the above by routing, by mail or hand delivery and postage prepaid by Affiant.

Attorney General Office of South Carolina by U.S. postage mail First Class at Post Office Box 11549

Columbia, South Carolina 29211

Anthony R. Taylor, 1549 Lilly Avenue Columbia, South Carolina 29204

Cc File

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

ALAN WILSON OF THE STATE OF SOUTH
CAROLINA
OFFICE OF THE ATTORNEY GENERAL

Anthony R. Taylor, Affiant
1549 Lilly Avenue
Columbia, South Carolina 29204

Post Office Box 11549
Columbia, South Carolina 29211

v.

Civil Action

Defendants:
The State of South Carolina Office of Attorney General,
Alan Wilson
Post Office Box 11549
Columbia, South Carolina 29211

CERTIFICATE OF SERVICE

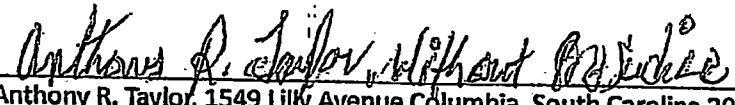
Honorable Frank R. Addy, Jr. 2159 Circuit 8
528 Monument Street Suite 210
Greenwood, South Carolina 296461
Office-(864) 943-8020, Fax- (864) 9428581

Jacqueline Marie Pavlicek, Esq.
Office of The City Attorney
Post Office Box 667 Columbia, South Carolina 29202

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Attorney General Office of South Carolina by U.S. postage mail First Class at Post Office Box 11549

Columbia, South Carolina 29211


Anthony R. Taylor, 1549 Lilly Avenue Columbia, South Carolina 29204

Cc File

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

Anthony R. Taylor #197565,

Plaintiff,

v.

Richland County Sheriff's
Department Narcotic Division,

Defendant.

IN THE COURT OF COMMON PLEAS

CIVIL ACTION NO.: 06-CP-40-0047

AFFIDAVIT OF
DAVID Y. WILSON

JEANETTE W. McBRIDE
C.C.P. & G.S.

2010 APR 20 AM 9:18

FILED
RICHLAND COUNTY

PERSONALLY APPEARED BEFORE ME, DAVID WILSON, who being duly sworn
deposes and states as follows:

1. I am familiar with the Plaintiff's factual allegations as I have reviewed his pleading entitled, "Motion and Motion Demanding the Return of Personal Property" ("Motion") filed in the above-referenced matter.

2. I have been a law enforcement officer for the past thirty-two (32) years.

3. While attending the University of South Carolina ("U.S.C"), I served as a campus police officer and upon graduation from U.S.C. in 1979, I was hired by the Columbia Police Department ("C.P.D.") as a police officer.

4. Several months later, I accepted an offer from then-Richland County Sheriff Frank Powell to work as a Deputy Sheriff with the Richland County Sheriff's Department ("RCSD")

5. In 1980, I graduated from the South Carolina Criminal Justice Academy. In 1983, I was promoted to investigator with the RCSD. In 1988, I received another promotion, this time

to lieutenant and supervised the Major Crimes Unit, the Crime Scene Unit, and the Burglary Unit at the RCSD for roughly eight (8) years until 1996.

6. In 1996, I left the RCSD during the administration of Sheriff Alan Sloan, and served as the Chief of Police in Seneca, South Carolina.

7. In 1997, following Sheriff Lott's election, I returned to the RCSD to serve as Major in charge of the Criminal Investigative Division, which included the Narcotics Unit.

8. My present title is Deputy Chief / Lab Director for the RCSD.

9. When this issue with respect to the Plaintiff's allegations came to my attention, I directed Inv. Robert Crane, the current RCSD seizure agent, to conduct an intensive search of official records maintained at the RCSD, in addition to all archived records.

10. This search of RCSD records yielded no records involving the Plaintiff for the date in which he has provided in his Motion.

11. Inv. Crane also searched the records at the Richland County Clerk of Court for any records related to the event in question.

12. The search of Clerk's records demonstrated no filings through their office with respect to any amount of money regarding the Plaintiff for money or property consistent with the information provided by the Plaintiff in his Motion.

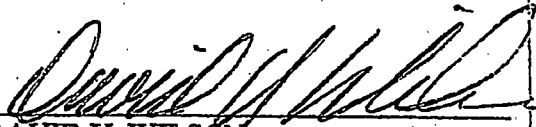
13. It is unknown as to whether any of these records were expunged. However, I have been advised that even had there been an expungement order issued in this matter, such would not have caused the destruction of civil records for the seizure in the Clerk of Courts Office.

14. I further instructed Inv. Crane contact and interview several officers who were connected to the RCSD Narcotics Unit at the time of the alleged seizure in 1991. These included

RCSD Lt. Andy Jones, Sgt. Berry Brown, and Major Daniel Lane as well as Barry Wright who was the seizure agent at the relevant times in 1991. All of these individuals stated that a search warrant had indeed been executed at 1918 DuPont and had recovered a large amount of marijuana in the process. However, none of these individuals recall a large cash seizure.

15. I additionally requested that Inv. Lloyd Dunham, formerly a RCSD seizure agent and presently a pilot with the RCSD Narcotics Unit to assist Inv. Crane in searching all available records as to the alleged 1991 incident. Specifically, all of the evidence sheets from December 1991 were pulled and no such evidence record during this time was located.

FURTHER, AFFIANT SAYETH NOT.



DAVID Y. WILSON

SWORN TO BEFORE ME THIS THE
15th DAY OF MARCH 2010.



NOTARY PUBLIC FOR SOUTH CAROLINA

COMMISSION EXPIRES: SEPT. 15 2018

COUNTY OF ROCKLAND

THE STATE OF
SOUTH CAROLINA,

vs.

Anthony Robert Taylor
Defendant

Tony Reid
AKA

2004 MAR 18 PM 3:05

BARBARA A. SCOTT
C.C.C. & G.S.

IN THE COURT OF THE COMMON PLEAS
ORDER FOR DESTRUCTION OF ARREST RECORDS.

Race N Sex M Age 52

#197568

DOB 1/1/52 SSN 1-11-1111

Charges were disposed of in the court indicated below:

() Magistrate () Municipal (X) General Sessions

IT APPEARS that the defendant is entitled to have all records relating to this offense expunged and destroyed according to the applicable section of the South Carolina Code of Laws indicated below:

Warrant/GS No. 92-65-401613 Date of Arrest 12/17/91

Arrest Charge TRAFFICKING IN MARIJUANA Place of Arrest Rockland County County, S.C.

- § 17-1-40. The charge was dismissed, not proessed or the defendant was found not guilty on 8-12-93
- § 17-22-150(a). The charge was dismissed on _____ by the Solicitor because the defendant successfully completed the Pre-Trial Intervention Program. (PTI Director must attest to eligibility for expungement).
- § 34-11-90(e). The defendant was convicted of a first offense misdemeanor under the Fraudulent Check Law on _____ and no additional criminal conviction as defined by § 34-11-90(e) has taken place in one year from date of conviction.
- § 44-53-450(b). The defendant was charged with first offense simple possession of marijuana or hashish on _____, received a conditional discharge and has successfully complied with the terms as set forth by the court.
- § 22-5-910. The defendant was convicted of a first offense in a magistrate or municipal court on _____, that offense did not involve the exceptions enumerated in § 22-5-910, and no additional criminal conviction as defined by § 22-5-910 has taken place within three years from date of conviction. (Summary Court Judge must attest to eligibility).
- § 22-5-920. The defendant was convicted of a first offense as a youthful offender on _____, that offense did not involve the exceptions enumerated in § 22-5-920, and no additional criminal conviction as defined by § 22-5-920 has taken place during a fifteen- year period following the first offense conviction as a youthful offender.
- § 56-5-750(F). The defendant was convicted of a misdemeanor first offense failure to stop motor vehicle on _____ and no additional criminal conviction has taken place for three years after completion of the sentence.

IT IS ORDERED that all records relating to such arrest and subsequent discharge pursuant to the above-referenced section be dismissed, expunged and immediately destroyed and that no evidence of such records pertaining to such charge shall be retained by any municipal, county or agency except nonpublic information retained on each person accepted for Pre-Trial Intervention pursuant to § 17-22-130, nonpublic information retained by SC Law Enforcement Division (SLED) pursuant to § 34-11-90(e), nonpublic information retained by the Department of Social Services pursuant to § 44-53-450, nonpublic information retained by SLED pursuant to § 22-5-910 and § 22-5-920, and nonpublic information retained by SLED and Department of Public Safety pursuant to § 56-5-750 (F).

I, W. Bay Giese, Jr.
Circuit Solicitor

Signed this 3-16-04 day of _____

[Signature]
Circuit Court Judge

It is noted that defendant was accepted into the PTI program based on the court's determination that defendant is eligible for expungement pursuant to Code § 17-22-150(a) (successful completion of PTI) or Code § 22-5-910 (summary court conviction).

On Motion of:

Anthony Robert Taylor #197568
Defendant / Attorney for Defendant (Circle One)

or Pre-Trial Intervention / Summary Court Judge (circle one)

EXPUNGEMENT ORDERS SHOULD NOT BE FORWARDED TO THE SOUTH CAROLINA COURT ADMINISTRATION (SCCA): (1) for magistrate or municipal court convictions/dispositions, because SCCA does not retain information which identifies defendants by name or SSN for these convictions; or (2) for GS convictions/dispositions because disposition data (including expungements) is sent to SCCA electronically, and expungements are automatically entered into SCCA records.

223 (7/2003)

Barbara A. Scott
C.C.C. & G.S.

VI. (b)(7)(C),(b)(7)(F)

Exhibit E-II

arrested and transported to the Richland County Detention Center. U. S. currency of \$27,020.00 was to purchase the marijuana and \$7,396.00 in U.S. currency was found in suspect bedroom closet during search warrant, both of which have been converted into cashier's checks, made payable to the U.S. Marshals Service, and held by the Drug Enforcement Administration.

(If more space is required, use a separate sheet of paper and attach.)

Attachment: Yes No

VII. Certifications:

A. The requester certifies that the above information is true and accurate, that the property transferred will be used for the law enforcement purpose stated, and that all monies received pursuant to this request will be deposited and accounted for consistent with applicable state laws, regulations and orders. The requester agrees to report on the actual use of equitably transferred property upon request. The requester agrees to pay fees and expenses necessary to effect transfer of title not later than the time of transfer. The requester understands that if it is unable to pay the necessary fees and expenses at the time of transfer, the asset will be sold and the maximum percent of net sale proceeds will be awarded in lieu of the asset.

✓ (b)(7)(C),(b)(7)(F)

3-3-92
Date

B. As legal counsel, I have reviewed this Application for Transfer of Federally Forfeited Property and I certify that the contact person identified in Part II has the authority to accept forfeited property and is the official to whom transfer documents and/or money should be delivered.

(b)(7)(C),(b)(7)(F) / Asst. Solicitor
Signature / Title

2-27-92
Date

Address: (b)(7)(C),(b)(7)(F)

Telephone Number: (b)(7)(C),(b)(7)(F)

Date: 11/3/12

Investigative Agency: DEIA

Case Number: 12-0008

U.S. Department of Justice

Exhibit E-III

Application for Transfer of Federally Forfeited Property
(For Use By United States Law Enforcement Agencies Only)

I. For Federal Use Only

(For Additional Information - See Instructions)

Asset #: 112012

Seizure Date: 1-11-12

Judicial District: ASCAR

Case Type: Adoption Joint (Check One)

- All assets transferred must be used for the law enforcement purpose stated in the request.
- Deadline for submission of this request is sixty (60) days following the seizure.
- The requesting agency will be responsible for reimbursing the Federal Government its costs and may be responsible, in a single-asset case, for reimbursing the federal share.

II. Requesting Agency Name: RICHLAND COUNTY SHERIFF'S DEPARTMENT

Address: P. O. Box 143 - 1400 HUGER STREET
Columbia, SC 29202

NCIC Code: SIC1102010

Contact Person: Sergeant (b)(7)(C),(b) Telephone Number: (b)(7)(C),(b)(7)(F)

III. Asset Requested 2 Cashier's Checks/\$34,315.00 Other assets in this case. (Attach list).

Property Description Request Type 60%

(1) Cashier's check for \$27,020.00 and (1) Cashier's check for \$7,295.00. Item Cash / Proceeds 75%

IV. Specific Intended Law Enforcement Use:

Salaries Purchase of Equipment Other (Please Explain):

Purchase of Vehicles Place Into Official Use (If other than Cash)

V. Contribution (If any answer to A thru E is yes, provide details in Part VI)

	Yes	No
A. Did your agency originate the information leading to the seizure?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B. Were any other assets seized under state law?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C. Were extraordinary expenses incurred?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D. Did your agency supply any unique or indispensable assistance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E. Are there any assets located in foreign countries associated with this case?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F. How many hours were expended? 84 hours		

WITNESSES

DOCKET NO. 92GS401613

The State of South Carolina,

County of RICHLAND

COURT OF GENERAL SESSIONS

FEBRUARY TERM 1992

54

THE STATE

ARREST WARRANT NO. D367453

ANTHONY ROBERT TAYLOR

ACTION OF GRAND JURY

TRUE BILL

*08-18-93 nolle prosequi
Δ pled to superseding
trafficking indictment
15 yrs*

Foreman of Grand Jury

Eric D. ...
Indictment for
TRAFFICKING IN MARIJUANA
SC CODE SECTION 44-53-370(e)(1)(a).

VERDICT

Foreman of Petit Jury

Date:

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

INDICTMENT FOR
TRAFFICKING IN MARIJUANA

At a Court of General Sessions, convened on August 18, 1993
the Grand Jurors of RICHLAND County present upon their oath:

That ANTHONY ROBERT TAYLOR did in Richland County on or about
the 17th day of January, 1992, sell, manufacture, cultivate, deliver,
purchase or bring into this State, or provide financial assistance
or otherwise aid, abet, attempt, or conspire to sell, manufacture,
cultivate, deliver, purchase, or bring into the State, or was
knowingly in actual or constructive possession of more than 10
pounds of marijuana.

Witness my hand and dignity of the State, and County, at the seat of the same in such case made and
provided.

ATTEST
A TRUE COPY

Richard A. Haystack
SOLICITOR

Barbara P. Scott

E. G. C. R. & G. E.

SENTENCE

Trafficking in
Marijuana
CASE NO. 93-GS-8223

STATE OF SOUTH CAROLINA
Richland COUNTY

The defendant Anthony Robert Taylor is committed to the State Department of Corrections/County for a term of 15 months/years and/or to pay a fine of \$ _____; provided upon the service of _____ months/years and/or payment of \$ _____, plus pay/waive costs and assessments as applicable*, the balance suspended with probation for _____ months/years.

Restitution For physical injury \$ _____
Yes No property damage \$ _____
to be paid _____

to clerk for _____ **

Other conditions none to begin April 14, 1993

Date 8/18/93 P. Henry McMiller
Presiding Judge

*Costs and Assessments
Non-waivable \$ _____
Not waived \$ _____
Total \$ _____

ATTEST
A TRUE COPY
Barbara C. Scott
Clerk of Court

**Pay to Victim's Compensation Not Collected.

WITNESSES

Owens, RCSD

Duo C. Harris

ARREST WARRANT NO. E473374

ACTION OF GRAND JURY

TRUE BILL

Foreman of Grand Jury *V*

VERDICT

Guilty of all as charged

6-19-96

Foreman of Petit Jury

Date:

DOCKET NO. *96 GS4010975*

The State of South Carolina,

County of RICHLAND

COURT OF GENERAL SESSIONS

82 MAY TERM 1996

THE STATE

vs.

ANTHONY R. TAYLOR

a/k/a

TONY RED

Indictment for

DISTRIBUTION OF MARIJUANA
(Third Offense)

§44-53-370(b).(2)

Class C/Felony
(188)

MAILROOM (NORTH)

DEC 1 1 2006

RECEIVED

TRUE COPY

Robert L. ...

SENTENCE

STATE OF SOUTH CAROLINA
RICHLAND COUNTY

CASE NO 96 GS-40 10975
WARRANT NO 473374
CHARGE Mist Mergers 30
OFFENSE CODE 188

SC STATUTE OFFENSE PENALTY CODE
44-53-320(b)(2)

The defendant Anthony R. Taylor is committed to the State Department of Corrections/County for a term of Ten 10 months/years and/or to pay a fine of \$ _____; provided upon the service of _____ months/years and/or a payment of \$ _____, plus pay costs and assessments as applicable, the balance is suspended with probation for _____ months/years.

RESTITUTION: YES/NO
PAYABLE TO CLERK FOR:
(VICTIM) _____

FOR PHYSICAL INJURY \$ _____
PROPERTY DAMAGE \$ _____
TOTAL \$ _____

Other Conditions _____

DATE June 19, 1996

Frank Egan
PRESIDING JUDGE

J.O.B. _____
S.S.N. _____

Def. Atty _____
Sol. Atty _____

Barbara A. Scott
CLERK OF CLERK

A TRUE COPY

Barbara A. Scott

3/W/O M/F

C. H. R. & Co. S.

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

INDICTMENT FOR
DISTRIBUTION OF MARIJUANA

At a Court of General Sessions, convened on May 22, 1996
the Grand Jurors of Richland County present upon their oaths

That ANTHONY R. TAYLOR a/k/a TONY RED did in Richland County on
or about January 23, 1996, manufacture, distribute, dispense, deliver, pur-
chase or aid, abet, attempt, or conspire to manufacture, distribute, dispense,
deliver, or purchase, or possess with intent to manufacture, distribute, dis-
pense, deliver, or purchase a controlled substance, to wit: marijuana.

Against the peace and dignity of the State, and contrary to the statute in such case made and
provided.

Warren B. Giese
SOLICITOR

IN TESTE
A TRUE COPY

Barbara H. [Signature]
[Signature]

WITNESSES

Owens, RCSD

D.W. C. Owens

ARREST WARRANT NO. E473373

ACTION OF GRAND JURY

TRUE BILL

Foreman of Grand Jury

VERDICT

Guilty - L. McCants

6-19-96

Foreman of Petit Jury

Date:

DOCKET NO. *916 GS4010974*

The State of South Carolina,

County of RICHLAND

COURT OF GENERAL SESSIONS

82 MAY TERM 1996

THE STATE

vs.

ANTHONY R. TAYLOR

a/k/a

TONY RED

Indictment for

3¹⁰/16

POSSESSION WITH INTENT TO DISTRIBUTE MARIJUANA
(Third Offense)

§44-53-370(b)(2)

Class C/Felony

(186)

ATTEST
A True Bill
Richard L. Davis
S. C. J. S. S.

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

INDICTMENT FOR
POSSESSION WITH INTENT TO DISTRIBUTE MARIJUANA

At a Court of General Sessions, convened on May 22, 1996

the Grand Jurors of Richland County present upon their oath:

That ANTHONY R. TAYLOR a/k/a TONY RED did in Richland County on or about January 23, 1996, manufacture, distribute, dispense, deliver, purchase or aid, abet, attempt, or conspire to manufacture, distribute, dispense, deliver, or purchase, or possess with intent to manufacture, distribute, dispense, deliver, or purchase a controlled substance, to wit: marijuana.

Against the peace and dignity of the State, and contrary to the statute in such case made and provided.

Warren B. Hise
SOLICITOR

APPEARED
A TRUE BILL

Barbara H. Smith
S. C. C. P. & S.

SENTENCE

STATE OF SOUTH CAROLINA
RICHLAND COUNTY

CASE NO 96 GS-40 10974
WARRANT NO E-473373
CHARGE WVIT Narcotics 2
OFFENSE CODE 188
SC STATUTE OFFENSE PENALTY CODE
44-53-370(b)(2)

The defendant Anthony R. Taylor committed to the State Department of Corrections/County for a term of Twenty 20 months/years and/or to pay a fine of \$ _____; provided upon the service of _____ months/years and/or a payment of \$ _____, plus pay costs and assessments as applicable, the balance is suspended with probation for _____ months/years.

RESTITUTION: YES/NO
PAYABLE TO CLERK FOR:
(VICTIM) _____

FOR PHYSICAL INJURY \$ _____
PROPERTY DAMAGE \$ _____
TOTAL \$ _____

Other Conditions _____

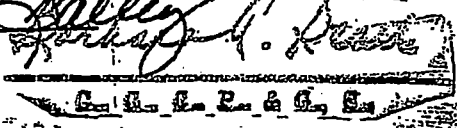
DATE June 19, 1996
D.O.B. _____

Frank Eggen
PRESIDING JUDGE

S.S.N. _____
Def. Atty W. S. Collopy ATTEST TRUE COPY
Sol. Atty Brodan Valley

Barbara A. Scott
CLERK OF CLERK

B/W/O M/F



Richland County Common Pleas

Clerk : Jeanette W. McBride
Richland County Judicial Center
Columbia, SC 29201
(803) 576-1999

DUPLICATE

Received From: Taylor, Anthony Robert

Date: 5/ 8/2023

Receipt #: 323203

Clerk: c40rmoorma

Paying for: Self

Transaction Type: Payment

Payment Type: Money Order \$150.00

Reference #: 2838

Comment:

Total Paid: \$150.00

Non-Refundable

Case #	Caption	Previous Balance	Amount Paid	Balance Due	S/T
2023CP4002377	Anthony Robert Taylor vs State Of Sc	\$150.00	\$150.00	\$0.00	220
Total Cases: 1		\$150.00	\$150.00	\$0.00	