

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

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

RECEIVED

MAY 30 2024

APPEAL FROM Richland COUNTY SC Court of Appeals
Court of Common Pleas

Judge J. Newman, Circuit Court Judge

Case No. _____

State of SC, et al

Respondent,

v.

Anthony R. Taylor

Appellant.

RICHLAND COUNTY
FILED
2024 MAY 30 PM 2:59
JEANETTE W. McBRIDE
C.C.P., G.S., & F.C.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on W.M. Hemlepp by depositing a copy of it in the United States Mail, postage prepaid, on May 30, 2024 addressed to their attorney of record, P.O. Box 667 Lenoir, SC 29202

Date: 4/30/24

si Anthony R. Taylor

Attorney for Appellant

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Anthony Robert Taylor,

Plaintiff,

vs.

The State of SC, Alan Wilson, Judge
Honorable Frank R. Addy, Jr., Attorney
Jacqueline Marie Pavlicek,

Defendant(s).

) IN THE COURT OF COMMON PLEAS

) FOR THE FIFTH JUDICIAL CIRCUIT

) C/A No.: 2023-CP-40-02377

) **ORDER DISMISSING PLAINTIFF'S**
) **COMPLAINT AND AWARDED**
) **SANCTION UNDER THE SOUTH**
) **CAROLINA FRIVOLOUS PROCEEDINGS**
) **ACT**

RICHLAND COUNTY
FILED
2024 MAY 20 AM 10:24
JEANETTE W. ROBERTSON
CLERK OF COURT
SOUTH CAROLINA

The Plaintiff in this matter is a *pro se* litigant seeking damages against the Defendant pursuant to a Summons and Complaint filed with the Clerk of Court on May 8, 2023, alleging various facts and circumstances against the Defendants. Defendant "Attorney Jacqueline Marie Pavlicek" was served and responded with a Motion to Dismiss pursuant to Rule 12(b)6 of the *South Carolina Rules of Civil Procedure* and requesting sanction(s) pursuant to the "South Carolina Frivolous Civil Proceedings Sanctions Act" §§15-36-10 et seq. of the *Code of Laws of South Carolina* (2005). The Plaintiff filed a response to the Motion on June 7, 2023.

This case was scheduled for a hearing before me at the Richland County Courthouse on February 16, 2024. Present at the hearing was the attorney for Defendant Pavlicek, W. Mike Hemlepp, Jr., Esquire of the Richland County Bar. Also present was the plaintiff, Anthony Robert Taylor, who was properly served with Notice of this Hearing by the Clerk of Court through mailing to his address of record.

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Anthony Robert Taylor,

Plaintiff,

vs.

The State of SC, Alan Wilson, Judge
Honorable Frank R. Addy, Jr., Attorney
Jacqueline Marie Pavlicek,

Defendant(s).

) IN THE COURT OF COMMON PLEAS

) FOR THE FIFTH JUDICIAL CIRCUIT

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) **SANCTION UNDER THE SOUTH**
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) **ACT**

RICHLAND COUNTY
FILED
2024 MAY 20 AM 10:34
SANNETTE W. McBRIDE
CLERK OF COURT
SOUTH CAROLINA

The Plaintiff in this matter is a *pro se* litigant seeking damages against the Defendant pursuant to a Summons and Complaint filed with the Clerk of Court on May 8, 2023, alleging various facts and circumstances against the Defendants. Defendant "Attorney Jacqueline Marie Pavlicek" was served and responded with a Motion to Dismiss pursuant to Rule 12(b)6 of the *South Carolina Rules of Civil Procedure* and requesting sanction(s) pursuant to the "South Carolina Frivilous Civil Proceedings Sanctions Act" §§15-36-10 et seq. of the *Code of Laws of South Carolina* (2005). The Plaintiff filed a response to the Motion on June 7, 2023.

This case was scheduled for a hearing before me at the Richland County Courthouse on February 16, 2024. Present at the hearing was the attorney for Defendant Pavlicek, W. Mike Hemlepp, Jr., Esquire of the Richland County Bar. Also present was the plaintiff, Anthony Robert Taylor, who was properly served with Notice of this Hearing by the Clerk of Court through mailing to his address of record.

A motion to dismiss is judged solely by the allegations in the four corners of the Plaintiff's Complaint. Rule 12(b)6 of the *South Carolina Rules of Civil Procedure*.

There is no discernable cause of action stated in the Plaintiff's complaint. Further, there is no relief stated or requested, even when taken in the light most favorable to the Plaintiff, which would be within the subject matter jurisdiction of the Circuit Courts of South Carolina. Based upon the Plaintiff's complaint, on its fact, I hereby find dismissal of this action is warranted. Based upon the arguments of the Plaintiff, providing leave to amend the complaint would not produce more clarity, and could produce less.

The standard for a frivolous proceeding is whether a reasonable attorney, in the same circumstances would believe, under the facts alleged, that the Plaintiff's claim may be warranted under existing law; or a reasonable attorney in the same circumstances would believe the Plaintiff's procurement, initiation, and continuation of the civil claim or defense is intended merely to harass or injure the other party; or for making frivolous arguments a reasonable attorney would believe were not supported by the facts. §15-36-10(A)(4) of the *Code of Laws of South Carolina (2005)*.

The decision to sanction for a frivolous proceeding is a question of law for the Court, not a question of fact for a jury because it sounds in equity, not in law. *Father v. S.C.D.S.S* 353 S.C. 254, 578 S.E.2d 11 (2003).

The "South Carolina Frivolous Proceedings Act" states, in pertinent part:

15-36-10(E) *In determining if an attorney, party, or a pro se litigant has violated the provisions of this section, the court shall take into account:*

- (1) the number of parties;*
- (2) the complexity of the claims and defenses;*
- (3) the length of time available to the attorney, party, or pro se litigant to investigate and conduct discovery for alleged violations of the provisions of subsection (A)(4);*
- (4) information disclosed or undisclosed to the attorney, party, or pro se litigant*

through discovery and adequate investigation;
(5) previous violations of the provisions of this section;
(6) the response, if any, of the attorney, party, or pro se litigant to the allegation that he violated the provisions of this section; and
(7) other factors the court considers just, equitable, or appropriate under the circumstances. §15-36-10(E)

After carefully listening to the arguments of counsel and the arguments of the Plaintiff, and after considering the factors outlined in §15-36-10(E) of the statute, I hereby find as a matter of law the Plaintiff's Complaint meets the definition of frivolous pursuant to §15-36-10 *et seq.* of the *Code of Laws of South Carolina*. The Court takes judicial notice of the many lawsuits against public officials which have been unsuccessfully filed by this Plaintiff.

The Defendant in this matter has also moved for Sanctions pursuant to the "Frivolous Proceedings Act". The movant is a public employee as an attorney in the Office of the City Attorney for the City of Columbia. She is a full-time employee of the City of Columbia and neither the Defendant nor the City of Columbia seeks attorney's fees and costs in this case as sanctions for filing this frivolous action. Instead, the Defendant seeks injunctive relief designed to protect against further vexacious litigation.


Based upon the foregoing, it is hereby ORDERED,

- a. That the claims contained in the Plaintiff's Complaint against the Defendant Pavlicek are hereby DISMISSED with prejudice;
- b. That the Plaintiff's complaint is hereby declared to be frivolous under the "South Carolina Frivolous Proceedings Act".
- c. That the Plaintiff is hereby enjoined from filing any further *pro se* complaints in the Circuit Courts of this State without prior permission of a judge of that Court who has

read the complaint in the light most favorable to the Plaintiff and determined the relief requested by the Plaintiff is within the jurisdictional authority of the Court if the allegations contained in the Complaint are proven to be true. In the alternative to prior judicial authorization, Plaintiff may attach to his pleadings a signed affidavit from a licensed attorney authorized to practice law in the State of South Carolina that the causes of action and claims made in the pleading are warranted under existing law, and are supported by adequate facts. This affidavit shall identify discernable causes of action contained the pleadings, together with the facts supporting each element of the causes of action.

- d. That this Order shall be forwarded to the South Carolina Supreme Court pursuant to 15-36-10(M) and shall be made a public document in the discretion of the South Carolina Supreme Court.

AND IT IS SO ORDERED!


JOCELYN NEWMAN, CIRCUIT COURT JUDGE
FIFTH JUDICIAL CIRCUIT

Signed this 15th day of May, 2024 at
Columbia, South Carolina or electronically
signed on the date and location as set forth
on the attached.

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT

Anthony Robert Taylor,)
)
Plaintiff,)

CIVIL ACTION NO: 2023-CP-40-02377

vs.)

ORDER GRANTING DEFENDANT THE
STATE OF SOUTH CAROLINA OFFICE
OF ATTORNEY GENERAL ALAN
WILSON'S MOTION TO DISMISS
AND DISMISSING THE MATTER AS TO
FRANK R. ADDY, JR.

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

Defendants.)

RECEIVED

MAY 30 2024

SC Court of Appeals

RICHLAND COUNTY
FILED
JANETTE W. McBRIDE
CLERK, C.S., & P.D.
2024 MAY 29 AM 10:54

This matter comes before the Court by way of a summons and complaint filed by Plaintiff on May 8, 2023. On May 26, 2023, Defendant The State of South Carolina Office of Attorney General, Alan Wilson moved pursuant to Rules 12(b)(1),12(b)(6) and 12(c), SCRPC, for an order of the court dismissing this action and sanctioning Plaintiff for his continued frivolous filings against the office and members of the judiciary. On May 26, 2023, Defendant Attorney Jacqueline Marie Pavlicek filed a motion pursuant to Rule 12(b)(6), SCRPC, requesting an order of the court dismissing this action and sanctioning Plaintiff. On June 8, 2023, Plaintiff filed a memorandum in opposition to Defendants' motions. A hearing on Defendants' motions was convened before me on February 16, 2024 at the Richland County Courthouse. Plaintiff was present and proceeded *pro se*. Defendant The State of South Carolina Office of Attorney General, Alan Wilson and the Honorable Frank R. Addy who was not served with process and has not appeared in the case were represented by Montgomery Willard, LLC of Columbia with B. Allen Bullard, Esquire appearing. Defendant Pavlicek was present and was represented by W. Mike Hemlepp, Jr., Esquire. This Court has had an opportunity to review the summons and complaint, the other pleadings in the matter and the motions and memoranda filed and has considered the arguments presented at the hearing by

2.

*

*

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

Anthony Robert Taylor,)

Plaintiff,)

vs.)

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

Defendants.)

IN THE COURT OF COMMON PLEAS)
FOR THE FIFTH JUDICIAL CIRCUIT)

CIVIL ACTION NO: 2023-CP-40-02377

ORDER GRANTING DEFENDANT THE)
STATE OF SOUTH CAROLINA OFFICE)
OF ATTORNEY GENERAL ALAN)
WILSON'S MOTION TO DISMISS)
AND DISMISSING THE MATTER AS TO)
FRANK R. ADDY, JR.)

RICHLAND COUNTY
FILED
2024 MAY 20 AM 10:24
FRANK W. McBRIDE
C.C.P., G.S., & F.R.P.

This matter comes before the Court by way of a summons and complaint filed by Plaintiff on May 8, 2023. On May 26, 2023, Defendant The State of South Carolina Office of Attorney General, Alan Wilson moved pursuant to Rules 12(b)(1), 12(b)(6) and 12(c), SCRCP, for an order of the court dismissing this action and sanctioning Plaintiff for his continued frivolous filings against the office and members of the judiciary. On May 26, 2023, Defendant Attorney Jacqueline Marie Pavlicek filed a motion pursuant to Rule 12(b)(6), SCRCP, requesting an order of the court dismissing this action and sanctioning Plaintiff. On June 8, 2023, Plaintiff filed a memorandum in opposition to Defendants' motions. A hearing on Defendants' motions was convened before me on February 16, 2024 at the Richland County Courthouse. Plaintiff was present and proceeded *pro se*. Defendant The State of South Carolina Office of Attorney General, Alan Wilson and the Honorable Frank R. Addy who was not served with process and has not appeared in the case were represented by Montgomery Willard, LLC of Columbia with B. Allen Bullard, Esquire appearing. Defendant Pavlicek was present and was represented by W. Mike Hemlepp, Jr., Esquire. This Court has had an opportunity to review the summons and complaint, the other pleadings in the matter and the motions and memoranda filed and has considered the arguments presented at the hearing by

Plaintiff and Defendants' counsel. | Set forth below are the findings of this Court with regard to Defendant The State of South Carolina Office of Attorney General, Alan Wilson's ("Defendant") motion.¹

A general review of Plaintiff's current and past complaints against various governmental entities, including two (2) prior cases against Defendant and the Office of the Attorney General, sound in a recovery for property seized in 1993 and 1996 as well as some form of reparations. This case seems to add a claim that the Court improperly dismissed his prior claims, which could only be resolved through the direct appeal process. Nevertheless, Plaintiff presents a rambling series of alleged indignations which he believes entitle him to some form of relief. Sections of his prayer for relief are instructive.

We seek an immediate compensation for 152 years or, war of 1871, White Supremacy under democracy against the God-image, the God-like, the dark, the light skinned/complexion and the 1/8% that Democracy labels the 'inferior one's. We seek the return of all personal properties unlawfully confiscated under indictment number 92-GS-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.

Plaintiff also seeks millions of dollars for alleged injuries emanating from his 1996 arrest (96-GS- 40-10975) and his 2020 arrest. Plaintiff's prayer for relief provides the clearest evidence of his claims. A review of his prior suits and the similar prayers for relief contained in those demonstrates that all Plaintiff is truly doing is attempting to re-litigate matters that have been previously decided with finality.

This Court finds that Plaintiff's complaint and this matter should be dismissed as his claims are not made in a time, place, or manner that allows recovery. His complaint even afforded the

¹ Plaintiff filed this action with a handwritten Civil Action Coversheet accompanied by a typewritten summons and complaint. Based upon this Court's review of the pleadings it finds that the references to "The State of South Carolina Office of Attorney General, Alan Wilson" and "The State of SC, Alan Wilson" are not separate defendants but, rather, are both attempts to bring an action solely against Attorney General Alan Wilson in his official capacity, and this Court so finds.

most liberal review considering his pro se status does not and cannot as a matter of law set forth a cause of action against either Attorney General Wilson or Judge Addy upon which relief can be granted. Therefore, for the reasons outlined below this Court finds that Defendant's motion should be granted, and this matter dismissed with prejudice.

1. **Plaintiff's claim is barred by the applicable statutes of limitation.**

Plaintiff's claims date to 1993, 1996, and 2000. He filed this complaint on May 8, 2023. Plaintiff does not plead, nor has he filed a claim as allowed by the tort claims act. Therefore, he cannot recover for any claim against the State that occurred before May 9, 2021. Every claim he purports to make in his complaint arose before that date.

2. **Plaintiff's claim is barred by the South Carolina Tort Claims Act S.C. Code Ann. §15-78-10, et. seq.**

Each of Plaintiff's claims emanate from legal actions or judicial actions taken by the State of South Carolina. *S.C. Code Ann. §15-78-60* specifically provides that:

The governmental entity is not liable for a loss resulting from:

- (1) legislative, judicial, or quasi-judicial action or inaction;
- (2) administrative action or enactment of a legislative, judicial, or quasi-judicial nature;
- (3) execution, enforcement, or implementation of the orders of any court or execution, enforcement or lawful implementation of any process;
- (4) adoption, enforcement, or compliance with any law or failure to adopt or enforce any law, whether valid or invalid, including, but not limited to, any charter, provision, ordinance, rule, resolution, or written policies;
- (5) the exercise of discretion or judgment by the governmental entity or employee or the performance or failure to perform any act or service which is in the discretion or judgment of the governmental entity or employee.

All claims raised by Plaintiff in his complaint fall under one of these express exceptions to government liability and his claims, therefore, cannot stand as a matter of law.

3. **Plaintiff's claims are barred by the doctrines of res judicata and collateral estoppel.**

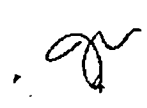
This is Plaintiff's third lawsuit against Defendant. The history of his multiple claims relating to the same subject matter and similar claims demonstrates that the Court has exhaustively considered a bevy of allegations and causes related to the case at bar, all stemming from the same incidents, long past applicable statutes of limitation and uniformly decided against him.

Plaintiff filed his first claim relating to some of the matters raised in this complaint in *Anthony Taylor v. Dan Johnson, et al. (2004-CP-40-02819)*. There he sought to recover property that he alleged was wrongfully confiscated from him by Richland County when he was arrested on or about December 17, 1991. The Court granted summary judgment in favor of the state actors in that case by Order dated May 13, 2005. Plaintiff sought an appeal, but it was dismissed by the South Carolina Court of Appeals by order dated January 25, 2006, due to Plaintiff's failure to pay the filing fee for his notice of appeal.

Plaintiff filed his first case against Defendant on January 25, 2019 (*Anthony Robert Taylor v. State of South Carolina, et al., 2019-CP-40-00486*). There he sought damages against the Attorney General for "violation of God-given unalienable (sic) Rights and . . . one million two hundred thousand dollars for damage, actual emotional distress, redemption for debt owed, misrepresentation and fraudulent intent to deprive. Plaintiff seeks an additional five million dollars or a total of defendant's assets and 33% of his/her gross income for life." Defendants filed a motion to dismiss, and the Court dismissed the case by order dated June 28, 2019.

After the Court dismissed his 2019 Action, Plaintiff filed a second claim against Defendant on May 26, 2020 (*Anthony R. Taylor v. State of South Carolina, et al., 2020-CP-40-2482*). In dismissing that case, the Court held:

This court cannot discern any possible or actionable claim lying in tort, statute, or under a constitutional right in this complaint. There is no allegation of any non-public duty against the Defendants. There is no allegation of any special duty owed



to the Plaintiff. Likewise, the Plaintiff's complaint, as it relates to negligence, fails to allege a breach of any duty owed by these defendants to him as well as damages directly and proximately the result of such duty. This court is unable to read the complaint such that even construed most liberally, a valid cause of action for negligence is pled. Plaintiff has no standing to pursue state or federal criminal charges or causes of action based thereon as alleged in his complaint. Likewise, the Plaintiff fails to articulate any allegations that may be read to deprive him or any party he purports to represent any constitutional right or cause any damage to them. Finally, the Plaintiff fails to allege any breach of a constitutional right to create any discernable claim that the court can detect alleging a violation of his constitutional rights.


Trying to find a cause of action for some constitutional deprivation is similarly fruitless. While Plaintiff's complaint is rife with racial epithet, it fails to allege any facts under which this court might grant relief under any arguable or colorable constitutional claim.

Plaintiff fails to allege facts from which the court, applying the most liberal standard, can find a cause of action that might allow the Plaintiff relief. His complaint, in fact, and at law, clearly fails to set forth a cognizable claim under Rule 12(b)(6).

Moreover, the only facts alleged against the Defendants seem to be centered on 1993 and 1996 convictions. Since these are far beyond any applicable statutes of limitation, was the court able to find a cognizable claim, it could not be decided in Plaintiff's favor as a matter of law, and the case must be dismissed under Rule 12(c).

The claims for relief in his 2020 action expanded on those in the 2019 action. Reviewing those claims and comparing them with those in the current action reveal that there are no new claims in the current action except those alleging that his prior actions were wrongfully dismissed. None of those claims are cognizable.

The fundamental purpose of Res judicata is "to ensure that 'no one should be twice sued for the same cause of action.'" *Judy v. Judy*, 393 S.C. 160, 173, 712 S.E.2d 408, 414 (2011) (internal citation omitted). Res judicata bars a second suit where there is (1) identity of parties; (2) identity of subject matter; and (3) adjudication of the issue in the first suit. *Judy*, at 167, 712 S.E.2d at 412. This is Plaintiff's third attempt to sue Defendant for the same cause of action. This Court finds Plaintiff is barred from doing so by res judicata.



4. Plaintiff's complaint fails to state a cause of action against Defendants upon which relief can be granted (Rule 12(b)(6)).

To survive a motion to dismiss, a complaint must contain sufficient factual matter, accepted as true, to "state a claim to relief that is plausible on its face." *Bell Atlantic Corporation v. Twombly*, 550 U.S. 544, 570, 127 S. Ct. 955, 167 L. Ed. 2d 929. A claim has facial plausibility when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged. *Id.*, at 556, 127 S. Ct. 1955, 167 L. Ed. 2d 929. The plausibility standard is not akin to a "probability requirement," but it asks for more than a sheer possibility that a defendant has acted unlawfully. *Id.*

The tenet that a court must accept as true all of the allegations contained in a complaint is inapplicable to legal conclusions. Threadbare recitals of the elements of a cause of action, supported by mere conclusory statements, do not suffice. *Ashcroft v. Iqbal*, 556 U.S. 662, 678, 129 S.Ct. 1937, 1949, 173 L.Ed. 2d 868,884 (2008). A court is not bound to accept as true a legal conclusion couched as a factual allegation. Rule 8, SCRCPP, marks a notable and generous departure from the hyper technical, code-pleading regime of a prior era, but it does not unlock the doors of discovery for a plaintiff armed with nothing more than conclusions. "Only a complaint that states a plausible claim for relief survives a motion to dismiss." *Id.*, at 556, 127 S. Ct. 1955, 167 L. Ed. 2d 929. Determining whether a complaint states a plausible claim for relief is a context-specific task that requires the reviewing court to draw on its judicial experience and common sense. But where the well-pleaded facts do not permit the court to infer more than the mere possibility of misconduct, the complaint has alleged -- but it has not "show[n]" -- "that the pleader is entitled to relief." Rule 8(a)(2), SCRCPP.

In keeping with these principles, a court considering a motion to dismiss can choose to begin by identifying pleadings that, because they are no more than conclusions, are not entitled to

the assumption of truth. While legal conclusions can provide the framework of a complaint, they must be supported by factual allegations. When there are well-pleaded factual allegations, a court should assume their veracity and then determine whether they plausibly give rise to an entitlement to relief.

In applying the general tenets of Rule 12(b)(6), this Court finds Plaintiff's complaint (even allowing for liberal interpretation due to his *pro se* status) fails as follows:

- (a) It fails to allege any claim for relief against Defendants as a matter of law because it fails to allege any facts which demonstrate Plaintiff is or can be entitled to any relief against Defendants.
- (b) It fails to allege any duty, breach of duty, damages, or facts sufficient to set out any legal, equitable, common law, or statutory cause of action as a matter of law.
- (c) To the extent it purports to allege causes of action for legal malpractice against Defendant, such a claim fails as a matter of law as no attorney-client relationship is alleged or ever existed between the Plaintiff and Defendant.
- (d) To the extent it purports to allege causes of action for negligence, it fails to allege a legally cognizable duty, breach of that duty, and damages arising as a direct and proximate result of the breach of said duty.
- (e) To the extent that it purports to allege equal protection or Section 1983 claims, he fails to allege the required elements of such claims.
- (f) Even considering all of the allegations contained in it in a light most favorable to Plaintiff, it is impossible to identify allegations alleging any set of facts which amount to a cognizable claim under any legal theory.

5. **Plaintiff's claims are barred by the Doctrine of Laches.**

Laches is neglect for an unreasonable and unexplained length of time, under circumstances affording opportunity for diligence, to do what in law should have been done. *Mid-State Trust, II v. Wright*, 323 S.C. 303, 474 S.E.2d 421 (1996); *Hallums v. Hallums*, 296 S.C. 195, 371 S.E.2d 525 (1988); *Muir v. C.R. Bard, Inc.*, 336 S.C. 266, 519 S.E.2d 583 (Ct. App. 1999). Laches is an equitable doctrine, which arises upon the failure to assert a known right. *All Saints Parish, Waccamaw v. Protestant Episcopal Church in the Diocese of S.C.*, 358 S.C. 209, 235, 595 S.E.2d



253, 267 (Ct. App. 2004).

Here, to the extent Plaintiff's claims could be considered equitable rather than legal, they are barred by his failure to timely pursue grievances dating back nearly thirty years, especially since his earlier pleadings demonstrate a longstanding awareness of the claims he is attempting to raise here.

6. Defendant is entitled to Judgment on the Pleadings.

A motion for judgment on the pleadings under Rule 12(c) may be made at any time "[a]fter the pleadings are closed - but early enough not to delay [the] trial." Rule 12(c), SCRCP. A motion for judgment on the pleadings is proper where pleadings entitle a party to judgment without proof, by disclosure of all facts, where the pleadings present no issue of fact or present merely an immaterial issue. *Rosenthal v. Unarco Indus., Inc.*, 278 S.C. 420, 422, 297 S.E.2d 638, 640 (1982). Where the pleadings are fatally deficient in substance or fail to state a good cause of action in favor of the plaintiff and against the defendant, judgment on the pleadings is proper. *Id.*

When deciding a Rule 12(c) motion for judgment on the pleadings, courts apply the same standard used to evaluate a motion to dismiss pursuant to Rule 12(b)(6). "A motion under Rule 12(b)(6) or Rule 12(c) admits well pleaded facts in the complaint, but it does not admit the inference drawn by the plaintiff from such facts, nor does it admit conclusions of law. The court must take all well pleaded facts as true." *Carolina Winds Owners' Ass'n, Inc. v. Joe Harden Builder*, 297 S.C. 74, 76, 374 S.E.2d 897, 899 (Ct. App. 1988). Construing every fact pled in a light most favorable to Plaintiff, this Court finds no action properly lies against Defendant.

7. Plaintiff's complaint is frivolous, and Plaintiff is subject to sanctions as a result.

The standard for a frivolous proceeding is whether a reasonable attorney, in the same circumstances would believe, under the facts alleged, that Plaintiff's claim may be warranted under existing law; or a reasonable attorney in the same circumstances would believe Plaintiff's



procurement, initiation, and continuation of a claim or defense is intended merely to harass or injure the other party; or for making frivolous arguments a reasonable attorney would believe were not supported by the facts. *S.C. Code Ann. §15-36-10(A)(4)*. The decision to sanction for a frivolous proceeding is a question of law for the Court, not a question of fact for a jury because it sounds in equity, not in law. *Holmes v. Haynsworth, Sinkler & Boyd, P.A.*, 408 S.C. 620, 641, 760 S.E.2d 399, 410 (2014).

S.C. Code Ann. §15-36-10(E) of the South Carolina Frivolous Proceedings Act states, in pertinent part:

- (E) In determining if an attorney, party, or a pro se litigant has violated the provisions of this section, the court shall take into account:
- (1) the number of parties;
 - (2) the complexity of the claims and defenses;
 - (3) the length of time available to the attorney, party, or pro se litigant to investigate and conduct discovery for alleged violations of the provisions of subsection (A)(4);
 - (4) information disclosed or undisclosed to the attorney, party, or pro se litigant through discovery and adequate investigation;
 - (5) previous violations of the provisions of this section;
 - (6) the response, if any, of the attorney, party, or pro se litigant to the allegation that he violated the provisions of this section; and
 - (7) other factors the court considers just, equitable, or appropriate under the circumstances. §15-36-10(E).

Based upon its review of the pleadings and other matters filed in this action; the other actions filed by Plaintiff of the same or similar nature, some of which are mentioned above; the arguments of counsel; the arguments of Plaintiff; and, after considering the factors outlined in §15-36-10(E) of the statute, this Court finds that Plaintiff's complaint is frivolous.

Defendant has requested this Court impose sanctions against Plaintiff for filing this frivolous action. Pursuant to S.C. Code Ann. § 15-36-10(G) sanctions may include: (1) an order for a pro se litigant to pay the reasonable costs and attorney's fees of the prevailing party, (2) an order



for the attorney to pay a reasonable fine to the court; or (3) a directive of a nonmonetary nature, including injunctive relief, designed to deter a future frivolous action or an action in bad faith. During the hearing counsel for Defendant and his co-Defendants proposed several alternative non-monetary sanctions against Plaintiff to dissuade further frivolous filings. This Court finds that a proper sanction in this matter is to enjoin Plaintiff from filing any action in any Circuit Court of South Carolina unless it is accompanied by a properly notarized affidavit by an attorney licensed to practice law in the State of South Carolina that he or she in good faith believes that the matter raised in the action is nonfrivolous and proper for a Circuit Court to consider.

IT IS THEREFORE ORDERED:

1. Defendant's motion to dismiss is granted; and,
2. Plaintiff's complaint against Defendant is dismissed with prejudice; and,
3. Plaintiff's complaint is deemed to be frivolous; and,
4. Plaintiff is enjoined from filing any action in any Circuit Court of South Carolina unless it is accompanied by a properly notarized affidavit by an attorney licensed to practice law in the State of South Carolina that he or she in good faith believes that the matter(s) raised in the action is/are nonfrivolous and proper for a Circuit Court to consider.
5. Based upon this Court's analysis of Plaintiff's claims herein, which are incorporated herein by reference and which this Court finds is equally applicable to the claims against Defendant Honorable Frank R. Addy, Jr., although he has not been served in this matter, Plaintiff's complaint against him is dismissed with prejudice as well.

AND IT IS SO ORDERED.

~~[E FILING ORDER SIGNATURE PAGE FOLLOWS]~~

Jocelyn Yeman

May 16, 2024

Exhibit (A)

3.

The South Carolina Court of Appeals

Anthony Robert Taylor, Appellant,

v.

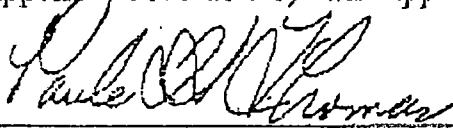
The State of South Carolina Office of Attorney General
Alan Wilson, Honorable Frank R. Addy, Jr., and
Attorney Jacqueline Marie Pavlicek, Respondents.

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

(B) Exhibit

MONTGOMERY WILLARD, LLC
ATTORNEYS AND COUNSELORS AT LAW
1002 CALHOUN STREET
COLUMBIA, SOUTH CAROLINA 29201

MICHAEL H. MONTGOMERY
MHM@MONTGOMERYWILLARD.COM
DIRECT DIAL NO. (803) 753-6484

POST OFFICE BOX 11886
COLUMBIA, SOUTH CAROLINA 29211-1886

CERTIFIED CIVIL MEDIATOR

FACSIMILE (803) 799-2755
WORLD WIDE WEB [HTTP://WWW.MONTGOMERYWILLARD.COM](http://www.MONTGOMERYWILLARD.COM)

RECEIVED

August 26, 2020

NOV 08 2024

SC Court of Appeals

4

PERSONAL AND CONFIDENTIAL

Mr. Anthony Taylor
1549 Lily Avenue
Columbia, SC 29204

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

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Anthony Robert Taylor

Plaintiff(s)

The State of SC, Alan Wilson
Judge Honorable Frank R. Adley 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 23T

SC Bar #: _____
Telephone #: _____
Fax #: _____
Other: _____
E-mail: _____

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>Special/Complex /Other</p> <ul style="list-style-type: none"> <input type="checkbox"/> Environmental (600) <input type="checkbox"/> Automobile Arb. (610) <input type="checkbox"/> Medical (620) <input type="checkbox"/> Other (699) <input type="checkbox"/> Sexual Predator (510) <input type="checkbox"/> Permanent Restraining Order (680) <input type="checkbox"/> Interpleader (690) | <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 # _____ <input type="checkbox"/> Notice/ File Med Mal (230) <input checked="" 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/Label (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) |
|---|---|--|--|

Submitting Party Signature:

Anthony R. Taylor

Date: May 8, 2023

JACQUETTE W. MERRIDE
 J.C.P., C.S. JUDGE
 MAY -8 PM 2:00
 RICHLAND COUNTY
 FILED

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

) 2021 CP4005864

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

RICHLAND COUNTY
FILED
2023 APR 24 PM 12:15
JEANETTE W. McBRIDE
Clerk, S.C. J.C. & EC

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?

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

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?

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 bureaucratese?
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

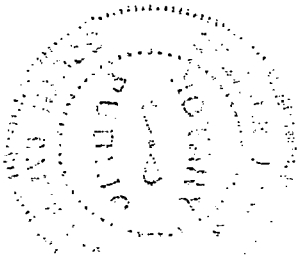
1549 Lilly Avenue

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

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:

CERTIFICATE OF SERVICE

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

RICHLAND COUNTY
FILED
JEANETTE W. McBRIDE
Clerk of Court
2023 APR 24 PM 12:16

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, Without Prejudice
Anthony R. Taylor, 1549 Lilly Avenue Columbia, South Carolina 29204

Cc File



Richland County Sheriff's Department

LEON L. LOTT, JR
Sheriff

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,

Leon Lott
Richland County Sheriff



Richland County Sheriff's Department

MAY 10 2023

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 attempts 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. Assit., 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]

[Signature] 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 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 Lily Avenue

CITY, STATE/ZIP Columbia South Carolina 29204

PHONE NUMBER (803) 463-7725



Richland County Sheriff's Department

LEON L. LOTT, JR.
Sheriff

RECEIVED

NOV 08 2024

SC Court of Appeals

7
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,

Leon Lott
Richland County Sheriff



Richland County Sheriff's Department

AFFIDAVIT OF SERVICE or NON-SERVICE

Date Entered: 05/09/21
File Number: C20230:
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 P. Wilkes, duty sworn says that he/she served, or at 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) 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 1000 Assembly St. Columbia SC on 05/15/23 - 3:46 PM and leaving him/her a

() 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

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 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 Honorable Frank Addy, Jr., 2159 Circuit 8, 528 Monument Street Suite 210 Greenwood, SC 29646

ADDRESS Post office Box 11549 / 1000 Assembly Street, Columbia 29201

CITY, STATE/ZIP Columbia, 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 Columbia, SC 29204

PHONE NUMBER (803) 463-7725



Richland County Sheriff's Department

LEON L. LOTT, JR.
Sheriff

RECEIVED

NOV 08 2024

SC Court of Appeals

Anthony Robert Taylor
1549 Lilly Avenue
Columbia, SC 29204

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,

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

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 attempt 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.

() 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
Kenneth Coleman

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

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

**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 Jacqueline 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 1463-7725

STATE OF SOUTH CAROLINA

COUNTY OF Richland

IN THE COURT OF COMMON PLEAS

Anthony Robert Taylor

Plaintiff(s)

The State of SC, Alan Wilson
Judge Honorable Frank R. Addy Jr.

Attorney Jacqueline Marie Paulick

Defendant(s)

RECEIVED CIVIL ACTION COVERSHEET

2023CP400 23T

NOV 08 2024

SC Court of Appeals

Submitted By:

Address: 1549 Lilly Ave
Columbia, SC 29204

SC Bar #:

Telephone #:

Fax #:

Other:

E-mail:

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) Inmate Petitions <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) Previous Notice of Intent Case # <u>20-NI-</u> <input type="checkbox"/> Notice/ File Med Mal (230) <input type="checkbox"/> Other (299) | <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/Label (380) <input type="checkbox"/> Other (399) | <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>Special/Complex /Other</p> <ul style="list-style-type: none"> <input type="checkbox"/> Environmental (600) <input type="checkbox"/> Automobile Arb. (610) <input type="checkbox"/> Medical (620) <input type="checkbox"/> Other (699) <input type="checkbox"/> Sexual Predator (510) <input type="checkbox"/> Permanent Restraining Order (680) <input type="checkbox"/> Interpleader (690) | <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>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>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) |

Submitting Party Signature:

Anthony R. Taylor

Date:

May 8, 2023

LETTE W. BRIDE
C.P. G.S. 14-202
MAY - 9 PM 2:00
FILED
RICHLAND COUNTY

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

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

COMPLAINT
NOTICE OF MOTION HEARING
(Jury Trial Demanded)

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
JEANETTE W. SCORRIDE
C.C.P., G.C.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.

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

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.

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 18th% 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

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

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.

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

CERTIFICATE OF SERVICE

2023 MAY -8 PM 2:00
JEANETTE W. McBRIDE
C.C.P., G.S., & F.C.

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

100

STATE OF SOUTH CAROLINA

)

IN THE COURT OF COMMON PLEAS

)

FIFTH JUDICIAL CIRCUIT

COUNTY OF RICHLAND

)

C\A No: 2020CP4002482

ANTHONY ROBERT TAYLOR,

)

"Nigger" Plaintiff,

)

ANSWER AND MOTION IN OPPOSITION
TO DEFENDANT MOTION TO DISMISS

Vs.

)

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

)

(Rule 12(b)(6) SCRPC
(RULE 12(C), SCRPC)

Defendants

)

RICHLAND COUNTY
FILED
2020 JUL -8 PM 12:14
JEANNETTE W. MCBRIDE
C.C.P. & G.S.

Comes now the Pro se "Nigger" Plaintiff in opposition to the defendant Motion to Dismiss (Rule 12(b)(6) SCRPC. "Nigger" Plaintiff asserts the defendant defense lacks any reasonable facts.

- 1) Defendant is relying on this honorable Court to rule in an unjust manner.
- 2) Defendant only interest is that of their client.
- 3) For the court to please the demand of defendant would result in a violation of both "Nigger" Plaintiff Constitutional Rights, and Human Rights. The State of South Carolina and Attorney General Office failure to secure "Nigger" Plaintiff's unalienable Rights is in violation of God given Law.
- 4) prohibited against the laws of all the legal documents drafted by the Founders. To allow this Motion To proceed any further can only add insults to injury that results into a mockery of this court.
- 5) This is a historical case of living facts and repeated inhuman acts and actions of Government denying both Constitutional and Human Rights to "Niggers". Over 200 years, under the Rule of Democracy, here in these United States of America "Niggers" have been under violent attack by the injustice used under government to keep "Niggers" living under inhuman indigence conditions. No man-made law can

control or change what God has reserved and given us (Unalienable Rights) even under this assault of ignorance, racism, hate and discrimination upon "Niggers" (just because they are "Niggers"). Over 200 years, "Niggers" good (God-like) reputation has been casted upon society as an evil, negative ugly image that must be hated and unaccepted in the fruit of life. The Defendant shows no compassion for the Rights of "Nigger" Plaintiff.

6) This defense of denial, hate, prejudice and discrimination must come to an end.

7) There are historical records of material facts in support of Pro se "Nigger" Plaintiff claim of hate, by the power of government. This hate is deeply rooted in our day to day operation and business by our justice system and government.

8) The root of this "Hate" of "Niggers" within the framework of our governmental structure is a more dangerous threat to the welfare and safety of our society than any wall, terrorist act, or from ISIS against our basic freedom and liberty as a free flesh and blood Man.

9) Under this Opposition the defendant has admitted their refusal to uphold their duties as governmental agents acting under the color of State and Federal law to secure the Unalienable Rights of all citizens, even "Niggers". Here the defendant wants the cake and ice cream too. This is not a celebrity Award as defendant expresses deep emotional support for the reputation of their client and lack of passion for the Plaintiff rights.

10) This is a case of life or death not a popularity contest as the defendant would like this court to rule as well as think. In closing pro se "Nigger" Plaintiff, would like to ask this court a question? Do or do not "Niggers" have any Rights here in these United States or under the control of America the Cooperation?

FURTHERMORE, Pro se "Nigger" Plaintiff prays this honorable Court Dismisses the defendant's Motion to Dismiss with prejudice and grant pro se "Nigger" Plaintiff his day in court to be heard as the Constitutional and Human Rights guaranteed.

Respectfully,

Anthony R. Taylor

Anthony Robert Taylor

Anthony R. Taylor
1549 Lily Avenue

Columbia, SC 29204

July 15, 2020 *Anthony R. Taylor*

CERTIFICATE OF SERVICE

I Anthony R. Taylor Pro se "Nigger" Plaintiff, hereby certify that I have served a copy of the foregoing Motion In Opposition to dismiss on all parties in the above captioned matter, by mailing a copy of same via United State Mail postage prepaid or hand delivery in person to the following address

MONTGOMERY WILLARD, L.L.C.
Michael H. Montgomery, Bar #4034
1002 Calhoun Street
Columbia, SC 29201

Columbia, South Carolina
July 6, 2020

Anthony R. Taylor
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Anthony R. Taylor
July 15, 2020

RICHLAND COUNTY
FILED
2020 JUL -8 PM 12:14
JEANNETTE W. MCBRIDE
C.C.P. & G.S.