

**BRIEF OF APPELLANT  
THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

**RECEIVED**

APR 10 2025

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Daniel Coble, Circuit Court Judge

Appellant Case No. 2024-001242  
Case No. 2023-CP-400-4408

**Kamarah Reynolds-Hall**

**Appellant,**

v.

**Jammie Robinson, John Dixon,  
Dominic Hill, Joseph Hunter, Anthony  
(AJ) Lawson, Javon Benson, Jahmar  
Brown, Cincere Scott, Jasmine  
Alexander-Coleman, Holder  
Properties, University of South  
Carolina, Defendants,**

**Holder Properties  
University of South Carolina**

**Respondents.**

[REPLY] BRIEF OF APPELLANT

Kamarah Reynolds-Hall  
5 Alatera Court  
Columbia, South Carolina  
PRO SE  
803-237-6057

TABLE OF CONTENTS

**Table of Authorities** .....4

Table of Cases.....

Statutes.....7

**Statement of Case**.....10

**South Carolina Rules of Civil Procedures**

**Rule 3-Commencement of Action**.....21

**Rule 4 (a)(b)(d)(8)(g)**.....22

**S. C. Code 16-3-210 Assault and Battery by Mob; investigation and apprehension; civil liability** .....7

**S. C. Code 16-3-600 (D) Assault and Battery**.....7

**American Bar Association**

**ABA Rule 4.1: Truthfulness in Statements to Others**.....7

**ABA Rule 8.4: Misconduct-Maintaining the Integrity of The Profession**.....7

**(SCACR) Rule 613 of the Supreme Court**.....8, 12, 37, 40

**E-Mail Service by and On Self-Represented Litigants. A self-represented litigant who is not a lawyer admitted to practice in this state may consent in writing to be served by e-mail and designate a correct e-mail address for service.**

## **18 United States Code**

**18 U.S.C.A Code § 1701 - Obstruction of the mail.....3, 11**

**18 U.S.C.A Code § 1702 - Obstruction of correspondence.....3, 7, 10, 11**

**18 U.S.C.A Code § 1703(b) (opening, destroying, or detaining mail without  
authority)..... 7, 10, 11**

## TABLE OF AUTHORITIES\*

### CASES

Courts typically favor allowing cases to proceed on their merits, so they may give plaintiffs an opportunity to correct any deficiencies in service before dismissing a case.

**Brown v. Inv. Mgmt. & Research, Inc.**, 323 S.C. 395, 400 n. 3, 475 S.E.2d 754, 756 n. 3 (1996).

1. [U]nder our current pleading rules only ultimate facts are required to be stated in pleadings. Ultimate facts are those which the evidence upon trial will prove, and not the evidence which will be required to prove those facts.

**Burnette v. New York Cent. R. Co.** 380 U.S 424, 428 (1965)

A courts equitable power is not bound by cast-iron rules but exist to do fairness and may be applied where it is justifiable under all the circumstances.

**Calloway v. Brownlee**, 366 F.Supp.2d 43, 55 (D.D.C.2005) (Walton, J.)

(observing that "[t]his Court gives *pro se* parties the benefit of the doubt and may ignore some technical shortcomings of their filings" (citing *Haines*, 404 U.S. at 520, 92 S.Ct. 594);

**Coggeshall v. Reproductive Endocrine Associates of Charlotte**

Doing business in the state can constitute jurisdiction in the state.

It would be unfair to permit a lawsuit in a distant jurisdiction, where a plaintiff may carry consequences, but the act was done in another jurisdiction.

*Hilska v. Jones*, 217 F.R.D. 16, 20 (D.D.C.2003)

- a. (holding that "the plaintiff carries the burden of establishing that he has properly affected service") (citing *Light*, 816 F.2d at 751).
- b. to do so, he must demonstrate that the procedure employed satisfied the requirements of the relevant portions of Rule 4 and any other applicable provision of law.

*Judy v. Judy*, 383 S.C. 1, 6, 677 S.E.2d 213, 216 (Ct. App. 2009).

An action in tort for damages is an action at law."

*Moore v. Agency for Int'l Dev.*, 994 F.2d 874, 876 (D. C. Cir. 1993).

1. However, "[p]ro se litigants are allowed more latitude than litigants represented by counsel to correct defects in service of process and pleadings
2. Although "[d]istrict courts do not need to provide detailed guidance to pro se litigants," they should at least "supply [*pro se* plaintiffs] minimal notice of the consequences of not complying with procedural rules." *Id.*

*Pelzer*, 378 S.C. at 521.

- a. Plaintiff would certainly be prejudiced by harsh penalty of dismissal at this stage. As can be seen by the prompt action in the beginning. Plaintiff did not sit on its rights but diligently attempted in good faith to enforce them. *See*

**Roche v. Young Bros. of Florence, 318 SC 207,210-12, 456 SE2d. 897, 899-901 (1995)**

A failure to forward a summons and complaint after receiving it does not constitute inadvertence or excusable neglect sufficient to put aside a default judgment.

**Sundown Operating Co.** The first task of a litigant who seeks for his default to be set aside is to provide a sufficient explanation for why he did not timely plead and must also provide reasons why letting him out of default would serve the interests of justice.

**STATUTES**

**S. C. Rules of Civil Procedure Rule 3-Commencement of Action.....21**

- a. **Commencement of civil action.** A civil action is commenced when the summons and complaint are filed with the clerk of court.
- b. The summons and complaint was served within the time frame of the statute of limitations in manner prescribed by law.

**S. C. Rules of Civil Procedure Rule 4 (a)(b)(d)(8)(g).....22**

- (a) **Summons: Issuance.** The summons shall be issued by plaintiff or plaintiff's attorney. Copies of the original summons shall be served ...

**S. C. Rules of Civil Procedure Rule 12(d)(8) Certified Mail.....Exhibit 2**

**S. C. Code 16-3-210 Assault and Battery by Mob; investigation and apprehension; civil liability .....7, 14**

**S. C. Code 16-3-600 (D) Assault and Battery.....7, 14**

**S. C. Code 36-2-802 (2012).....7, 12, 13**

A court may exercise **personal jurisdiction** over a person domiciled in, organized under the laws of, doing business, or maintaining his or its principal place of business in, this State as to any cause of action.

**SC Code § 36-2-805 (2024).....7, 13**

A court of this State may exercise jurisdiction on any other basis authorized by law.

## FEDERAL AUTHORITIES CITED

**18 U.S.C.A Code § 1701 - Obstruction of the mail**.....3, 8, 11

Whoever knowingly and willfully obstructs or retards the passage of the mail, or any carrier or conveyance carrying the mail, shall be fined under this title or imprisoned not more than six months, or both.

**18 U.S.C.A Code § 1702 - Obstruction of correspondence**.....3, 8, 11

a federal law that makes it illegal to obstruct the delivery of mail or to open, destroy, or steal mail that isn't addressed to you. This is known as "obstruction of correspondence

**18 U.S.C.A Code 1703(b) (opening, destroying, or detaining mail without authority)** 3, 8, 11

Whoever, without authority, opens, or destroys any mail or package of newspapers not directed to him, shall be fined under this title or imprisoned not more than one year, or both.

## AMERICAN BAR ASSOCIATION

**ABA Rule 4.1: Truthfulness in Statements to Others**.....2, 8, 14-18

In the course of representing a client a lawyer shall not knowingly:

**(a) make a false statement of material fact**

**ABA Rule 8.4: Misconduct-Maintaining the Integrity of The Profession**.....2, 8, 14-19

It is professional misconduct for a lawyer to:

**(c) engage in conduct involving dishonesty, deceit or misrepresentation.**

**(SCACR) Rule 613 of the Supreme Court.....2,9, 24**

The Supreme Court may promulgate an order setting forth permissible methods of electronic service in the trial courts, including by e-mail

**E-Mail Service by and On Self-Represented Litigants. A self-represented litigant who is not a lawyer admitted to practice in this state may consent in writing to be served by e-mail and designate a correct e-mail address for service.**

## STATEMENT OF THE CASE

On August 22, 2023, Kamarah Reynolds-Hall, a former student and an aspiring athlete at the University of South Carolina (“USC”), filed a complaint pro se in the Richland County Court of Common Pleas, naming several individuals, USC, and Holder Properties, Inc. (“Holder”) as the defendants. Reynolds-Hall appears to have sued Holder for premises liability, alleging that Holder leased to USC the athletic dorm building located at 650 Lincoln Street in Columbia, SC, in whose stairwell and parking garage the assault took place.

## DISCUSSION

**Part 1-Shows the Premeditated Actions** [https://youtu.be/w\\_eEsABZ9MY](https://youtu.be/w_eEsABZ9MY)

**Part 2-USC Coverup of Assault by Mob Aug 23, 2020** <https://youtu.be/BYHYkoe8XCw>

**Part 3-Jammie Robinson lies to USC PD-University of South Carolina-Cover Up of Assault by Mob** <https://youtu.be/sre9YeMeVHM>

**Part-5-John Dixon Interview** <https://youtu.be/TL7aotENEDw>

[http://youtu.be/fQ5DSH5T\\_ma](http://youtu.be/fQ5DSH5T_ma)

**Argument 1. Did the circuit court properly dismiss the complaint?**

**STANDARD OF REVIEW**

Courts typically favor allowing cases to proceed on their merits, so they may give plaintiffs an opportunity to correct any deficiencies in service before dismissing a case.

(observing that "[t]his Court gives *pro se* parties the benefit of the doubt and may ignore some technical shortcomings of their filings" (citing *Haines*, 404 U.S. at 520, 92 S.Ct. 594);

The appellant would certainly be prejudiced by harsh penalty of dismissal at this stage. As can be seen by the prompt action in the beginning. Plaintiff did not sit on its rights but diligently attempted in good faith to enforce them. See *Pelzer*, 378 S.C. at 521.

A failure to forward a summons and complaint after receiving it does not constitute inadvertence or excusable neglect sufficient to put aside a default judgment. *Roche v. Young Bros. of Florence*, 318 SC 207,210-12, 456 SE2d. 897, 899-901 (1995).

**DISCUSSION**

The Honorable Judge Coble should not have dismissed the complaint for insufficient service of process in the civil action in Case 2023 CP-40-4408. The respondent violated Federal Laws to avoid legal responsibilities to the appellant.

**DISCUSSION**

**18 U.S. Code § 1701 - Obstruction of the mail.** Whoever knowingly and willfully obstructs or retards the passage of the mail, or any carrier or conveyance carrying the mail, **shall be fined under this title or imprisoned not more than six months, or both.**

**18 U.S. Code § 1702 - Obstruction of correspondence.** Whoever takes any letter, postal card, or package before it has been delivered to the person to whom it was directed, with design to obstruct the correspondence, or to pry into the business or secrets of another, or opens, secretes, embezzles, or destroys the same, **shall be fined under this title or imprisoned not more than five years, or both.**

**18 U.S.C. § 1703(b) (opening, destroying, or detaining mail without authority)** Whoever, without authority, opens, or destroys any mail or package of newspapers not directed to him, **shall be fined under this title or imprisoned not more than one year, or both.**

## **Argument 2. The Honorable Judge Coble erred in not imposing Jurisdiction over Holder Properties**

### **STANDARD OF REVIEW**

#### **Coggeshall v. Reproductive Endocrine Associates of Charlotte**

Doing business in the state can constitute jurisdiction in the state.

It would be unfair to permit a lawsuit in a distant jurisdiction, where a plaintiff may carry consequences, but the act was done in another jurisdiction.

#### ***Mallory v. Norfolk Southern R. Co., 2023 WL 4187749***

The United States Supreme Court ruled Norfolk Southern consented to jurisdiction of Pennsylvania state courts by way of Pennsylvania statute requiring corporations to register within the state.

#### **SC Code § 36-2-802 (2012)**

A court may exercise personal jurisdiction over a person domiciled in, organized under the laws

of, doing business, or maintaining his or its principal place of business in, this State as to any cause of action.

**S. C. Code 36-2-802 (2012)**.....

A court may exercise **personal jurisdiction** over a person domiciled in, organized under the laws of, doing business, or maintaining his or its principal place of business in, this State as to any cause of action.

**SC Code § 36-2-805 (2024)**

A court of this State may exercise jurisdiction on any other basis authorized by law.

### **DISCUSSION-JURISDICTION**

The United States Supreme Court ruled that corporations can now be required to consent to personal jurisdiction if they want to do any business within a state. This is no matter how small the business within the state may be and even if that small business had nothing to do with the plaintiff's claim as states may require an out-of-state corporation to consent to personal jurisdiction as part of registration to conduct any business within a state.

### **DISCUSSION-LONG ARM JURISDICTION**

To establish that personal jurisdiction is proper, one must assess the Long-Arm Statute of the State or Federal Court first and then move to assessing Due Process under the Constitution.

To Satisfy the Long-Arm Statute: (State of South Carolina): "A court may exercise personal jurisdiction over a person domiciled in, organized under the laws of, doing business, or maintaining his or its principal place of business in, this state as a cause of action.

S.C. §36-2-802.

Doing business in the state can constitute jurisdiction in the state. It would be unfair to permit a lawsuit in a distant jurisdiction, where a plaintiff may carry consequences, but the act was done in another jurisdiction. **Coggeshall v. Reproductive Endocrine Associates of Charlotte.**

### **DISCUSSION**

Yes, South Carolina require out-of-state companies to register as "foreign corporations" before conducting business in the state, obtaining a Certificate of Authority from the South Carolina Secretary of State. Out-of-state companies must also designate a registered agent in South Carolina to receive legal notices and other official communications.

### **DISCUSSION-Brittany Brittany Blantz**

**Brittany Blantz is the respondent property manager** designated as the registered agent in South Carolina to receive legal notices and other official communications in Columbia, SC.

**Summons and Complaint: The PS Form 3811 (September 25, 2023** was mailed back as for receipt of the certified mail that contained the summons and complaint. **Service was effected** September 25, 2023, through September 29, 2023.

Brittany Blantz and Nicole Martin both shared an office for the respondent in Columbia, Carolina. They are both property managers as general agents for Holder Properties.

The respondent and CMM Realty had a duty to return the certified mail that contained the summons and complaint to the post office. The respondent had the summons and complaint in their possession for a total of 261 days.

### Argument 3. Affidavit- intent was to under mind the Circuit Court

#### STANDARD OF REVIEW

ABA Rule 4.1: Truthfulness in Statements to Other

ABA Rule 8.4: Misconduct-Maintaining the Integrity of The Profession

#### DISCUSSION

The rules of civil procedure are designed to ensure that both parties go to trial knowing what all evidence exists, rather than being sandbag by the opposing side by that with holds information and evidence.

#### DISCUSSION

Holder Properties and the University of South Carolina are listed under the same **Case 2023-CP-40-4408** in the summons and complaint. It is unimaginable that Holder Properties did not know of the existence of the lawsuits of both respondents in separate cases. **The respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.** The respondent had the summons and complaint for **a total of 261 days of 365 days in a year.**

#### DISCUSSION

The attorney hired by Holder Properties Catherine Griffin and Adam Sonenshine the general counsel have knowingly engaged in conduct unbecoming of the way lawyers are to practice their craft. have made multiple The respondent has conducted itself in ways that go against the American Bar Association Rules 4.1: Truthfulness in Statements.

## DISCUSSION-Affidavit

The appellant states the court should not have allowed the respondent to submit an affidavit to be used in court without notifications of its existence to the appellant. The judge should have granted continuance for the appellant to examine the affidavit.

## DISCUSSION-Affadavit of Adam Sonenshine

The respondent has conducted itself in ways that go against the American Bar Association Rules 4.1: Truthfulness in Statements. The attorney hired by Holder Properties Catherine Griffin and Adam Sonenshine the general counsel has knowingly engaged in conduct unbecoming of the way lawyers are to practice their craft. have made multiple false statements in the lower circuit court and now in the Appellate Court. Adam Sonenshine, the chief operating officer and general counsel for Respondent, averred that Holder Properties, Inc. he has never been served with the lawsuit. **CMM Realty Nikole Martin (she worked for CMM Realty when the certified mail arrived addressed only to the respondent.) The respondent hired Nikole Martin on Oct 2, 2023)**

**Proper Service was interrupted** by the Respondent and CMM Realty had a duty to return the certified mail that contained the summons and complaint to the post office. The respondent had the summons and complaint in their possession for **a total of 261 days.**

**Obstruction of Correspondence**-Respondent and CMM Realty Obstructed the Correspondence and tampered with the certified mail that contained the summons and complaint. The respondent had the summons and complaint in their possession for **a total of 261 days.**

**CMM Realty Nicole Martin (new hire for the Respondent) opened the certified mail that contained the summons and complaint.**

#### **Argument 4. Concealment of Nicole Martin**

##### **STANDARD OF REVIEW**

American Bar Association

ABA Rule 4.1: Truthfulness in Statements to Other

ABA Rule 8.4: Misconduct-Maintaining the Integrity of The Profession

##### **DISCUSSION-Holder Properties**

Holder Properties and the University of South Carolina are listed as 2 defendants in the lawsuit in Case 2023-CP-40-4408. Holder Properties leases buildings to the University of South Carolina.

##### **DISCUSSION-Nicole Martin**

**Nicole Martin** is the most important person of the illegal intent to deceive the courts and violate the Due Process of the appellant.

1. **September 25-29, 2023** was the last work week with CMM Realty as a Property Manager. In seven days she would start employment with Holder Properties.
2. **October 2, 2023** new employment as a Property Manager with Holder Properties

**Nicole Martin** opened the certified mail that contained the summons and complaint. The respondent and CMM Realty had a duty to return the certified mail that contained the summons and complaint to the post office. The recipient on the certified mail is Holder Properties

1. No one knows what the contents are in the certified mail until its opened by Nicole Martin
2. Holder used this as an opportunity to say the wrong property management company was being served.

## **Argument 5. SUMMONS AND COMPLAINT**

### **STANDARD OF REVIEW**

**However, "[p]ro se litigants are allowed more latitude than litigants represented by counsel to correct defects in service of process and pleadings," Moore v. Agency for Int'l Dev., 994 F.2d 874, 876 (D.C.Cir. 1993).**

A courts equitable power is not bound by cast-iron rules but exist to do fairness and may be applied where it is justifiable under all the circumstances. **Burnette v, New York Cent. R. Co. 380 U.S 424, 428 (1965)**

**ABA Rule 4.1: Truthfulness in Statements to Other**

**ABA Rule 8.4: Misconduct-Maintaining the Integrity of The Profession**

## **DISCUSSION-Certified or Registered Mail**

South Carolina law allows service of a summons and complaint by certified or registered mail, return receipt requested. The return receipt serves as proof of service, demonstrating that the summons and complaint were received by the intended recipient. A person serving a summons can send it by certified mail, return receipt requested. In South Carolina a case is not automatically dismissed simply because it was served this way. The **PS Form 3811** is a valid **method for** summons and complaint by certified or registered mail, with return receipt requested. Service is considered effective on the date of delivery as shown on the return receipt (PS Form 3811). **Failure to prove service does not invalidate service.**

Courts generally prefer to resolve cases based on their actual merits rather than technicalities, such as improper service. If a plaintiff fails to properly serve a defendant, the court may give them an opportunity to correct the service before dismissing the case. This means the plaintiff can re-serve the defendant with proper procedures, allowing the case to proceed. In some cases, the court might dismiss the case without prejudice, meaning the plaintiff can refile the case after correcting the service issues.

**The appellant followed the SC Rules of Civil Procedure. The appellant was placed at a disadvantage with the handling of the certified mail that contained the summons and complaint intended for the respondent only.** The appellant states he should have been allowed the opportunity to re-Serve the respondent because the statute of limitation would have allowed enough time to re-serve the respondent. **Appellant states there were 25 days remaining to re-serve the respondent after the court ruling.**

## DISCUSSION

### HOLDER PROPERTIES -SUMMONS AND COMPLAINT

Holder Properties say they don't like the way they were served but again makes claim how do we know they were served. The certified-mail letter was addressed to the respondent Holder Properties. The respondent knows that ABA Rule 8.4 states It is professional misconduct for a lawyer to engage in conduct involving dishonesty, deceit or misrepresentation.

There is direct admission as to the knowledge of the summons and complaint when the following claims were being made: Holder Properties had the summons and complaint in their possession for **a total of 261 days of 365 days in a year.**

1. This is a direct admission they were in possession of the summons and complaint
2. Nicole Martin was given permission to open the certified mail listing the recipient as her new employer Holder Properties.
3. **The respondent had a duty by law to return the certified mail that contained the summons and complaint to the post office.** Holder Properties next makes reference that suggested the wrong property management

company was being served. Nicole Martin opened the certified mail that contained the summons and complaint.

1. The recipient on the certified mail is Holder Properties
2. No one knows what the contents are in the certified mail until its opened.
3. Holder used this as an opportunity to say the wrong property management company was being served.

## **DISCUSSION-Handling of Summons and Complaint**

**Proper Service was interrupted** by the **Respondent and CMM Realty had a duty to return the certified mail that contained the summons and complaint to the post office.**

The respondent had the summons and complaint for **a total of 261 days of 365 days in a year.**

**Brittany McJunkin** signed for the certified mail that contained the summons and complaint.

The respondent and CMM Realty had a duty to return the certified mail that contained the summons and complaint to the post office.

**Nikole Martin - CMM Realty Property Manager obstructed correspondence when she opened** the certified mail that contained the summons and complaint. The respondent and **CMM Realty** had a duty by law to return the certified mail that contained the summons and complaint to the post office.

**Brittany Blantz- The respondent authorized agent to sign for legal documents** for Columbia, South Carolina Operations received the opened certified mail that contained the summons and complaint from **Nikole Martin.**

Brittany Blantz and Nicole Martin both share an office for the respondent in Columbia, Carolina.

They are both property managers as general agents for Holder Properties.

The respondent had the summons and complaint in their possession for **a total of 261 days.**

**The respondent and CMM Realty had a duty to return the certified mail that contained the summons and complaint to the post office.**

**Adam Sonenshine is the** General Counsel that received the summons and complaint from Brittany Blantz.

1. He received the summons and complaint from Brittany Blantz a property manager for Holder Properties in Columbia, South Carolina that reports directly to him.

2. He hired Nicole Martin in September 2023 that was employed at CMM Realty with a start date of October 2, 2023 as listed on her Indeed work experience.

The respondent had the summons and complaint for **a total of 261 days of 365 days in a year.**

## **Argument 6. Commencement of Action- Summons and Complaint**

### **STANDARD OF REVIEW**

#### **South Carolina Rules of Civil Procedure**

1. **Rule 3**
2. **Rule 4 (a)(b)(d)(8)(g)**

#### **USPS POSTAL SERVICE 602**

### **DISCUSSION**

The appellant followed Rule 3 for Commencement of Action.

- c. **Commencement of civil action.** A civil action is commenced when the summons and complaint are filed with the clerk of court.
- d. The summons and complaint was served within the time frame of the statute of limitations in manner prescribed by law.

The appellant followed Rule 4 for Process.

**Rule (a) Summons: Issuance.** The summons shall be issued by plaintiff or plaintiff's attorney. Copies of the original summons shall be served upon each defendant.

**Rule (b) Same: Form.** The summons shall be signed by the plaintiff or his attorney, contain, **be**

**directed to the defendant.**

**Service is perfected five days** after its deposit in the United States mail, as evidenced by the postmark,

1. **September 21, 2023**, all summons and complaints were mailed by certified mail.

**Service was effected September 25, 2023, through September 29, 2023.**

**September 25, 2023, The PS Form 3811** was mailed back as for receipt of the certified mail that contained the summons and complaint. **A copy of the return receipt or returned envelope when received showing whether the mailing was accepted, refused, or otherwise returned.**

**Argument 7. THERE WAS NO WRITTEN AGREEMENT TO SERVE  
THE APPELLANT BY EMAIL**

**DISCUSSION-NO CONSENT TO BE SERVED BY EMAIL**

Appellant states that the South Carolina Appellate Court Rule 613(d) states that a self-represented litigant who is not a lawyer admitted to practice in this state may consent in writing to be served by e-mail and designate a correct e-mail address for service.

## CONCLUSION

The circuit court erred in dismissal of the complaint for insufficient service of process the consequent lack of personal jurisdiction. The respondent has intentionally concealing the existence of the summons and complaint to violate the Due Process to the appellant in court.

The appellant wants the court to overturn the decision of the circuit court's order and allow a trial based on the merits of the case. The respondent should not have been allowed to use a last-minute effort of use of an affidavit not seen by the appellant.

Rule 4 (g). Failure to make proof of service does not affect the validity of the service.

For an award of \$300,000 for pain and suffering and loss of enjoyment of life, emotional distress, and mental anguish (past, present and future).

For a court order granting default judgement to the appellant in the amount of \$300,000.

Catherine Garbee Griffin  
3710 Landmark Drive, Suite 400  
PO Box 8057  
Columbia, South Carolina 29202  
803-799-9091

**Attorney for Holder Properties**

David DeMasters  
2838 Devine Street  
Columbia, South Carolina 29205  
803-799-9993

**Attorney for University of South Carolina**

Damon Christian Wlodarczyk  
PO Box 12009  
Columbia, South Carolina 29211  
**Attorney for University of South Carolina**

---

Kamarah Reynolds-Hall  
5 Alatera Court  
Columbia, South Carolina 29229  
803-237-6057

**PRO SE**

Injustice University of South Carolina by Travis  
Hall Part 1 of 17 - Sports To 1  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 7 of 17 - Vietnam Memorial Confirms  
Assault  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 13 of 17 - Fifth Circuit Solicitor  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 2 of 17 - Lured  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 8 of 17 - Alyssa Blue  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 14 of 17 - Deputy Circuit Solicitor  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 3 of 17 - Quoted  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 9 of 17 - James Miles and Travis Hall  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 15 of 17 - Voiceover Attacker James  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 4 of 17 - Devoured Black Life  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 10 of 17 - USC PD is Corrupt  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 16 of 17 - Attacker Voiceover John  
Dean  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 5 of 17 - Staff Communication  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 11 of 17 - Graham Voiceover  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 17 of 17 - Voiceover Attacker Joseph H  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 6 of 17 - Director of Football  
Operations  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina by Travis  
Hall Part 12 of 17 - Geary Voiceover  
<https://www.youtube.com/watch?v=...>



Injustice University of South Carolina Part 18 of  
18 - Premise Liability Holder Properties  
<https://www.youtube.com/watch?v=...>



## **QR CODES**

### **2020-USC Coverup of Assault by Mob**

**Injustice@University of South Carolina-Part 9-USCPD James Miles confirms assault by Mob to Travis Hall**

**Injustice@University of South Carolina-Part 1-Sports Talk**

**Injustice@University of South Carolina-Part 2-Lured**

**Injustice@University of South Carolina-Part 7-Victim confirms assault**

**Injustice@University of South Carolina-Part 3-Quad**

**Injustice@University of South Carolina-Part 18-Premise Liability**

**Injustice@University of South Carolina-Part 5-Staff Communications**

**Injustice@University of South Carolina-Part 6-Director of Football Operations**

**Injustice@University of South Carolina-Part 4-Devalued Black Life**

**Injustice@University of South Carolina-Part 13-Fifth Circuit Solicitor-Byron Gipson**

**Injustice@University of South Carolina-Part 14-Deputy Solicitor Dan Goldberg**

**Injustice@University of South Carolina-Part 10-USCPD is corrupt**

**Injustice@University of South Carolina-Part 8-Alyze Rhue tells USCPD Graf about the assault**

**Injustice@University of South Carolina-Part 11-Voiceover-USCPD Gallman of the assault**

**Injustice@University of South Carolina-Part 12-Voiceover-USCPD Geary of the assault**

**Injustice@University of South Carolina-Part 15- Voiceover-Jammie Robinson of the assault**

**Injustice@University of South Carolina-Part 16- Voiceover-John Dixon of the assault**

**Injustice@University of South Carolina-Part 17-Voiceover-Joseph Hunter**

Injustice University of South Carolina by Travis  
Hall Part 1 of 17 - Sports Talk  
<https://youtu.be/aUmsAZdNuw>



Injustice University of South Carolina by Travis  
Hall Part 7 of 17 - Victim Kamarah Confirms  
Assault  
<https://youtu.be/LEwRPPGDQ>



Injustice University of South Carolina by Travis  
Hall Part 13 of 17 - Fifth Circuit Solicitor  
<https://youtu.be/FudnhHNS-Q>



Injustice University of South Carolina by Travis  
Hall Part 2 of 17 - Lured  
[https://youtu.be/Ohv\\_Y3woctU8](https://youtu.be/Ohv_Y3woctU8)



Injustice University of South Carolina by Travis  
Hall Part 8 of 17 - Alyze Khoo  
<https://youtu.be/qOZ24roPiU>



Injustice University of South Carolina by Travis  
Hall Part 14 of 17 - Deputy Circuit Solicitor  
<https://youtu.be/ksLXn765ukM>



Injustice University of South Carolina by Travis  
Hall Part 3 of 17 - Quad  
<https://youtu.be/3F1Pi68liq>



Injustice University of South Carolina by Travis  
Hall Part 9 of 17 - James Miles and Travis Hall  
[https://youtu.be/OnOSRVu\\_hc](https://youtu.be/OnOSRVu_hc)



Injustice University of South Carolina by Travis  
Hall Part 15 of 17 - Voiceover Attacker Jammie  
[https://youtu.be/N1\\_dRns0jE](https://youtu.be/N1_dRns0jE)



Injustice University of South Carolina by Travis  
Hall Part 4 of 17 - Devoured Black Life  
<https://youtu.be/3lkmAyU-HQ>



Injustice University of South Carolina by Travis  
Hall Part 10 of 17 - USC PD is Corrupt  
<https://youtu.be/OSjPOUXCw50>



Injustice University of South Carolina by Travis  
Hall Part 16 of 17 - Attacker Voiceover John  
Dixon  
<https://youtu.be/y2Mm1m3Bk>



Injustice University of South Carolina by Travis  
Hall Part 5 of 17 - Staff Communication  
<https://youtu.be/SY2Fwdl9gg>



Injustice University of South Carolina by Travis  
Hall Part 11 of 17 - Goldman Voiceover  
<https://youtu.be/Ye10XKlic-1>



Injustice University of South Carolina by Travis  
Hall Part 17 of 17 - Voiceover Attacker Joseph H  
<https://youtu.be/Cmbq9TmH070>



Injustice University of South Carolina by Travis  
Hall Part 6 of 17 - Director of Football  
Operations  
<https://youtu.be/nRfufvic-3Y>



Injustice University of South Carolina by Travis  
Hall Part 12 of 17 - Geary Voiceover  
<https://youtu.be/16Y2zY2IE>



Injustice University of South Carolina Part 16 of  
18 - Premise Liability Holder Properties  
<https://youtu.be/gnSSI-BGeg>



# University of South Carolina Cover up of Assault by Mob Aug 23, 2020

## USC Football Players



**Jammie Robinson @JayRob\_7**  
Florida State Univ #10  
Aggravated Assault  
Dr. John E. Thraeber, President,  
Florida State University  
Athletic Director, Florida State University  
860-644-1078 • Ad@athletics.fsu.edu



**John Dixon @Johnny Dixon**  
Penn State Univ #3  
Dr. Eric J. Barron, President • Penn State University  
814-865-7611 • president@psu.edu  
Sandy Barbour, Athletic Director, Penn State University  
814-865-1066 • athletic\_director@athletics.psu.edu



**Dominick Hill**  
Temple University #28  
President Jason Wingard • Athletic Director  
P. 215-204-7405 • (F) 215-204-5600  
president@temple.edu  
Media Inquiries - Emily Sprate emily@temple.edu



**Jahmar Brown @Jrock8**  
Coastal Carolina #8,  
President of Coastal Carolina University  
President@coastal.edu • 843-349-2002  
President Benson Twitter @michaeltbenson • Joe Moglia,  
843-234-3487 • kingston@coastal.edu • @CoachJoeMoglia  
Jamey Chadwell • Head Football Coach • 843-334-3487,  
kingston@coastal.edu • @CoachChadwell,  
Vice President of Intercollegiate Athletics and  
University Recreation • 843-349-2231 • dhogue@coastal.edu  
Melissa Todd • 843-349-2231 • mtodd@coastal.edu

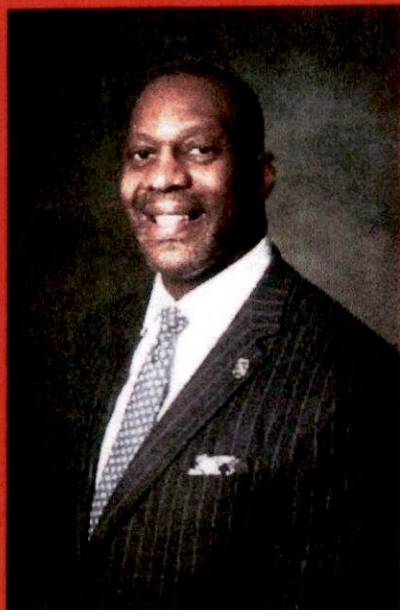


**Joseph Hunter @Jo3yhunter**  
USC Football #14  
Dr. Harris Pastides, Interim President,  
University of South Carolina  
president@usc.edu  
Ray Tanner, Athletic Director, USC  
803-777-4202 • adirect@mailbox.sc.edu



**Rashad Amos @ldreamShad**  
USC Football #23

650 Athletic Dorm  
Campus of USC  
0100-0140



## Byron E. Gipson

Solicitor: Bobby Gipson  
803-878-1800 • scsolicitor5@richlandcountysc.gov  
SC Attorney General  
Alan Wilson  
803-734-3970

SC Law Section  
16-3.210  
Assault and Battery  
By Mob  
Section 16-3.600  
Aggravated Assault

## Evidence

- ☑️ Part 1-Shows the Premeditated Actions  
[https://youtu.be/w\\_eEsABZ9MY](https://youtu.be/w_eEsABZ9MY)
- ☑️ Part 2-USC Coverup of Assault  
by Mob Aug 23, 2020  
<https://youtu.be/BYHYkoe8XCw>
- ☑️ Part 3-Jammie Robinson-Omits the Assault by  
Mob -USC PD Major Miles and Hunter  
Adkins-Aug 24, 2020  
<https://youtu.be/sre9YeMeVHM>
- ☑️ Part 4-John Dixon Interview  
<https://youtu.be/TL7aotENEDw>
- ☑️ Part 5-Full Version-Aug 23, 2020  
Assault by Mob  
<https://youtu.be/uttOoXvmggQ>

## USC Basketball Players



**AJ Lawson @itsajlawson**  
Dallas Mavericks #29

## USC Basketball Player



**Ja'von Benson #21 @jbrezzzy**  
Dr. Harris Pastides, Interim President,  
University of South Carolina  
president@usc.edu  
Ray Tanner, Athletic Director, USC  
803-777-4202  
adirect@mailbox.sc.edu



**Cincere Scott @cingothandz**  
USC Salkehatchie

Chris Nesmith, Dean,  
USC Salkehatchie  
803-812-7330  
cnesmit@mailbox.Sc.edu  
Jeremy Joye, Athletic Director,  
USC-Salkehatchie  
843-782-8601 or 803-812-7317  
Email: joyejl@mailbox.sc.edu



**Jasmin Alexander-Coleman**  
1-803-414-9791

# Retaliation

## Retaliation-For Speaking Out

Plaintiff states he was retaliated against by the University of South Carolina, the University of South Carolina Police Department, SLED Special Agents and the Fifth Circuit Solicitor Office.

Plaintiff states his freedom was in jeopardy for reporting the premeditated assault by mob he suffered on August 23, 2020. violent attack against me.

Plaintiff states he was **targeted and criminalized** by the University of South

1. At this point, I feel that **the University is complicit in the actions of the players of the assault by mob.**
2. At this point, I feel that university of south Carolina is complicit in their involvement to harassment my sister by them calling the **Child Protective Services** repeatedly for 3 years.

### The Fourteenth Amendment

Due process was broken numerous times in this case involving those athletes at the University of South Carolina.

Plaintiff states he is powerless against this justice system and should be protected.

Plaintiff states the video evidence was with-held by the University of South Carolina

Plaintiff states on October 19, 2020, document the following would have to happen to obtain evidence.

**The University of South Carolina responds that it will take a court of law to obtain requested video of 650 Lincoln Athletic Dorms.**

**SC Code 16-3-220-Lynching by Mob and SC Code 16-3-210**

**Crimes committed on August 23, 2020**

1. Aggravated Assault by Jammie Robinson that caused head injury.
2. Premeditated Assault by Mob SC 16-3-210
3. Assault and Battery SC Law 16-3-600(D)
4. Kidnapping. SC Law 16-3-910

Plaintiff states he was maliciously charged and arrested on a felony charge for looking for the premeditated leader is Jammie Robinson for attacking him with a total of a 6 on 1.

Plaintiff states the treatment of the players that attacked him were treated different by University police having listed the assault case as minor which it should be listed as a Lynching by Mob a felony.

**Plaintiff states the University of South Carolina, USCPD, SLED and the Fifth Circuit Solicitor campaigned to cause harm and destruction to his life.**

### USCPD-University of South Carolina Police Department

The University of South Carolina Police Chain of Command and officials did not do their jobs properly.

1. They chose to attack our son, the victim.

There are violations of my Constitutional Rights, the Constitution of South Carolina, Article 1, Section 24.

1. I should have been treated with fairness and respect and dignity and free from intimidation or abuse.

### Plaintiff states that the University of South Carolina President

- (a) Former University of South Carolina President Pastides
- (b) Former University of South Carolina President Robert Caslen
- (c) Provost. [provost@mailbox.sc.edu](mailto:provost@mailbox.sc.edu)
- (d) William Tate. [wtate@sc.edu](mailto:wtate@sc.edu)

### Plaintiff states that the University of South Carolina Police Division Leadership is all complicit.

Wuterich, Christopher L, **Associate Vice President, and Chief of Police**  
803-777-8400 [cjw@mailbox.sc.edu](mailto:cjw@mailbox.sc.edu)

Prill, Scott W. **Deputy Chief of Police**  
803-777-8403 [prills@mailbox.sc.edu](mailto:prills@mailbox.sc.edu)

Hagins, Todd Director, **Compliance and Professional Standards**  
803-777-8625 [haginsct@mailbox.sc.edu](mailto:haginsct@mailbox.sc.edu)

- a. **Major James Miles.** [jmiles@mailbox.sc.edu](mailto:jmiles@mailbox.sc.edu)
- b. **Stephen Bernie.** [birmies@mailbox.sc.edu](mailto:birmies@mailbox.sc.edu)
- c. **Major Geary TJ Geary.** [geary@sc.edu](mailto:geary@sc.edu)
- d. Lt. McKellar Shannon [McKella2@mailbox.sc.edu](mailto:McKella2@mailbox.sc.edu)

- e. USC PD Jon Graf- assigned to criminally side [Grafj@mailbox.edu](mailto:Grafj@mailbox.edu)
- f. USC PD Chris Gallman assigned to the Assault.

Plaintiff states that the following agencies colluded to conceal real and critical evidence to Obstruct justice.

1. University of South Carolina
2. USCPD-University of South Carolina Police Department
3. Fifth Circuit Solicitor Office
4. Fifth Circuit Solicitor-Byron Gipson
5. Fifth Circuit Solicitor-Deputy Dan Goldberg
6. SLED
7. SA-Stoner
8. SA Bobby Bancroft
9. Lt. DeQuawn Smith

### Athletic Department

Plaintiff states that the University of South Carolina Athletic Director Ray Tanner was complicit in the coverup.

- a. Ray Tanner-USC Athletics Director.
- b. Will Muschamp-Former Head Coach now at The University of Georgia
- c. Trevoris Robinson-Defensive Coordinator now at University of Georgia, University of Alabama
- d. George Wynn-Director of Football Operations 1-352-514-5769
- e. Frank Martin-Current UMASS Head Basketball Coach, former USC Head Basketball Coach of both Javon Benson and former Basketball Player A.J. Lawson.

## Failure to Intervene- Civil Rights

### Fourteenth Amendment Right to Liberty

Therefore, an officer who witnesses a fellow officer violating an individual's constitutional rights may be liable to the victim for failing to intervene.

## When the elected ones choose not to do their jobs.

### When the elected ones choose not to do their jobs.

Some will determine how the law should be applied as in this case. Some lawmakers have used the power of the pen to discriminate.

1. Fifth Circuit Solicitor-Alumni of USC

### USC, USC PD, SLED, Fifth Circuit Solicitor are clearly in the wrong here.

1. My family feared for his life.
2. No cooperation with our family.

### People perish for lack of knowledge. Film of Assault by Mob

I released film footage in the discovery and identified an Assault by Mob

1. Still no arrest
2. USC PD, USC, SLED had the evidence to arrest the attackers and accomplices.
3. I released it and was threatened by the Fifth Circuit Solicitor.

I say to them No Justice, No Peace into ones proclaiming **KNOW JUSTICE, NO PEACE.**

1. There have been individuals wronged in the Justice system by abuse of the law and wrongfully handed criminal records and incarcerated.

### With our history of inculcating bias based on race through film and other media, when will we acknowledge that there exists a serious problem with the policing of blacks.

1. So, if we don't address these wrongful prosecutions there can be no real true racial healing unless I sound the alarm.

## USC and Fifth Circuit Solicitor

The University South Carolina campus police have been retaining critical evidence that shows the attack in the stairwell on Aug 23, 2020.

The University South Carolina showed the victim and Travis Hall an abbreviated part of the attack. The Assault Investigator said that he doesn't have video from the stairwell located at 650 Lincoln Athletic dorms that would show the 6 Football players attacking the victim.

August 23, 2020@0127am. Mob Attack by (6) attackers with help from female accomplice.

1. Individuals are known.
2. **Crime Log verifies time entered by USCPD. See attachment.**
3. Check bate stamp on warrant.

August 24, 2020. EKG completed in team facility.

August 25, 2020. Dressed out in team facility.

August 25, 2020. Kicked off-team for being assaulted by the mob

August 26, 2020. Deformation by George Wynn

### **August 27, 2020VIDEO -USC PD Graf**

USCPD Jacob Graf acknowledges he has seen the video of the assault of Reynolds-Hall by mob of (6) six USC Football Players

### **August 31, 2020. Video of -USC PD Major Miles**

1. **Major Miles says** that Reynolds-Hall was chased, and attack and he can prove it.
2. Maj Miles informs Mr. Hall that it's an assault level case.
3. **Major Miles in interview with Jammie Robinson that there are 3300 cameras on the campus**

## SEPTEMBER 8, 2020.

### UofSC football players under investigation for alleged assault

by **Joe Gorchow** | September 8, 2020, at 9:15 PM EDT - Updated September 8 at 11:14 PM

COLUMBIA, S.C. (WIS) - Tonight, WIS investigates allegations detailing an assault involving Gamecock football players. A parent of a University of South Carolina student has gone on social media, stating 6 Gamecock players attacked his son, Kamarah Reynolds-Hall.

WIS  - **What we do know is that a physical altercation took place involving Reynolds-Hall and at least one Gamecock football player. It allegedly happened late August, according to Reynolds-Hall's dad, Travis.**

## Retaliation-Arrest

**October 9, 2020,**

**USCPD notified us that the University South Carolina Police Department was planning to issue a warrant.**

**October 10, 2020.**

I was pulled over for speeding. The officer ran my name in the system, and it came back that I was in the NCIS but no warrant ON FILE.

## **Retaliation-USCPD Jacob Graf**

**Plaintiff states USCPD Jacob Graf initiated harassment of victim family.**

**DSS-USCPD Jacob Graf contacts DSS to file Child Neglect**

**Plaintiff says the defendant** intent to intimidate and re-victimized the plaintiff family over and over for three years.

August 28, 2020.

**Falsely reports** someone with my daughter has a gun. It's proven false.  
**Note:** Provide the film.

USCPD has targeted our family, repeated calls to DSS against our daughter in a campaign to discredit our military family.

1. **Damaged Reputation.** Produced injury and damage to the victim by the wrongful action of the police.

**USCPD Jacob Graf says and does contact the (DSS) Department of Social Services Child Protected Services on my daughter.** I feel that this is a form of harassment by the school and the Campus Police because they are complicit in obstruction of justice for the University interest.

**Note: Done because he couldn't get information.**

1. He never reports or documents the violent attack.
2. He launches obstruction to destroy the character of our son and intimidate our family.

August 28, 2020. A day or later the threat was carried out because my daughter was paid a visit by Child Protective Services.

## **Harassment of victim sister**

1. With holding critical information of the assault
2. Allowing the officer to harass the victim family.
3. Allowing the officer to file false DSS Charge
  1. USCPD Jacob Graf communicates that he is contacting DSS to Retaliation reporting our daughter who arrives after our son was attacked.
  2. False statement accepted from the (6) attackers.
    - a. Investigator Graf says on August 27, 2020, someone has a gun.
    - b. He has the video please prove it

- c. Next, he says my daughter put the child in danger by coming to check on her brother.

d.

USCPD Jacob Graf filed a false endangerment report against my sister and caused undue stress and mental stress.

1. **This was done to intimidate, harass and defame my family.**

## RETALIATED-Department of Social Service

### Retaliation-Department Social Service

#### DSS- Department Social Service call to harass defendant.

USCPD Jacob Graf called in a **False Report of child endangerment** to Social Service about my Grandchild.

Aug 29, 2020. USCPD Jacob Graf calls DSS.

- **Richland County DSS-Attack the family of the victim.**
  - Note: 19:00 of the DSS. **USCPD Jacob Graf filed a false endangerment report** against my sister and has continued to cause undue stress and mental stress.
1. **1:52 Child Safe, Child not around**
  2. We are still going through visits from the Richland County DSS
  3. Sister comes to see whom attacked brother
  4. CHILD is not near altercation or violence

#### Sept 2, 2020. New Complaints to DSS

See message: (Daughter)

Renee from Richland County DSS

I've been reported for child abuse and neglect and said she can't discuss allegation details over the phone

**USC PD-Graf** Adds DSS reporting because my granddaughter was downstairs with an adult.

**Camera.** Child never is around fight. The investigator says he will be preparing to call DSS. The child was with an adult.

1. Investigators are conducting one sided view.
2. Deliberately lied to us and it's on the recording.

#### False reports to DSS-A misuse of the agency

1. False calls to DSS to Harass Family.

Dec 15, 2020. Repeated calls (Anonymous) to DSS Department of Social Service to harass family.

2. There is Ms. Graham and Ms. Davis.

#### INTIMIDATION AND HARASSMENT-DSS

### Police Report-Fabricated the Report

USCPD Jacob Graf and the Univ South Carolina are **intimidating and Harassing student and family** attacked by Univ South Carolina players reports Child Abuse and neglect against my daughter.

It's all one-sided.

They only want to focus on vandalism.

1. Call DSS to say someone has a gun?
2. Wrote report to cause any reader TO think that this innocent young man is criminal.
3. The report was written to cause the reader to assume that there is the presence of a gun and shell casings in the stairwell. Gang related and related.
4. **notified DSS that my daughter has a child abuse charge to cover up this matter to protect players.**
- 5.

### Retaliation-DSS-Department of Social Service

1. USCPD Jacob Graf
2. USCPD Jacob Graf told us he was going to call Child Services
3. USC continued to make false calls to put the family under duress.
4. Our family was subject to visits weekly.
5. No one could tell us where the calls were coming from.
6. Harassment of my family by abusing the reporting system of the DSS.
7. Multiple False Calls to DSS reporting child neglect.
8. Aug 28. Child Services were called.

### DSS-Video

USCPD Jason Graf acknowledges child not near violence but there.

1:52:21 to ▲ USCPD Jacob Graf says Kids not near violence but files the report to intimidate and harass us.

9:00 ▲ Kid not near violence

1. USCPD Jacob Graf called DSS and reported child endangerment.

Dec 15, 2020. Repeated calls (Anonymous) to DSS Department of Social Service to harass

family. There is Ms. Graham and Ms. Davis.

## **Retaliation-Fifth Circuit Solicitor-Malicious Prosecution**

Byron Gipson, Fifth Circuit Solicitor

**Prosecutorial Misconduct**

**False Charges for victim Xavier Legette**

**False Arrest:** 8-23-2020

**Statute-**Attempted to re-write a statute to get Kamarah Reynolds-Hall to sign.

Kamarah Reynolds-Hall has never been in trouble with the law.

1. Kamarah Reynolds-Hall was a freshman in his 2nd week in college.
2. Kamarah Reynolds-Hall was a legal University student.
3. Kamarah was **lured to 650 Lincoln Athletic Dorms** by two (2) USC Basketball players to be attacked by Jammie Robinson.
4. Kamarah was **attacked by six (6) 2020 USC Football players** Jammie Robinson, John Dixon, Dominic Hill, Joseph Hunter, Jahmar Brown and Rashad Amos at 650 Lincoln Athletic Dorms.
5. **Solicitor-Re-Writing Statute**
6. Travis Hall (Father) **read the charge and noticed it didn't match the statute.**
7. You can **compare it against the one he intentionally wrote.**
8. Byron Gipson is a dirty Solicitor that should be barred from practicing law, arrested and prosecuted for his criminal behavior on behalf of the University of South Carolina.

**PERJURY.** Byron Gipson wrote a false and tampered statement that each of the six (6) attackers falsified their Official Statement.

1. **Perjury. The Fifth Circuit Solicitor Byron Gipson** wrote and submitted a false statement of Jammie Robinson by saying I was warned not to come to 650 Lincoln Athletic Dorms located on the University of South Carolina and managed by Holder Property.
2. **Rashad Amos statement confirms the Fifth Circuit Solicitor statement is a perjury and he should be punished**
3. **USCPD Graf. Rashad Amos says on his Official statement that it was the 2020 USC basketball that contacted them.**
4. **I was lured to 650 Lincoln Athletic Dorms** located on the University of South Carolina and managed by Holder Property.
5. **I was attacked by 6 2020 Football Players 650 Lincoln Athletic Dorms** located on the University of South Carolina and managed by Holder Property.
6. The statement the Solicitor wrote was false that said he was previously warned that he was trespassing in building 650 Lincoln Athletic Dorm on the campus of the University of South Carolina on August 23, 2020.
7. USCPD Graf. Rashad Amos says on his Official statement that it was the 2020 USC basketball that contacted them.

## **Retaliation comments-24/7 Social-Media**

◆ Comments by: UofSCLaw- Disrespects Travis Hall honorable military service  
Posted on Sep 7th, 2020, 10:10 PM- He/She  
should be barred from practicing law

**Crappy people come from every walk of life including the military.**

Summerof66 said...

(original post)

1. The dad is retired ex-military.
2. Not a sucker or loser

Dehumanized our family

**Attorney Misconduct on the site**

**NOLACock2001-He/SHE should be barred from practicing law**

Posted on Sep 7th, 7:09 PM,  
843ish said... (original post) <https://twitter.com/carcsports365?s=21>

**Looking at this tweeter account - I would take this case and by the time my client & I got finished with Pops, he'd be paying my client until the day he died. He'd never own another thing in his pathetic life.**

**You don't name names on tweeters of any allegation you can't prove.**

**Every name he lists, receives financial aid and he's demanding that aide be ripped from them based on his allegations not anything they've admitted to or the police charged them with.**

**2020 Football Players**

**Jammie Robinson, John Dixon-Transferred 2020**

**Jahmar Brown, Dominic Hill-Transferred 2021**

**Joseph Hunter-Rashad Amos-Transferred 2022**

**This is the parent everyone should learn from. Pops, your son is over 18 yrs. old - you no longer have a legal right to speak for him!**

**You are however responsible for your own words, and you WERE NOT THERE!**

**You're making these allegations, and you will never be able to prove them because you have no basis of what's true or false because you have no first-hand knowledge!**

**And to top it off - you were stupid enough to say these things on camera YOU SIR ARE THE TRUE AND COMPLETE DEFINITION OF "IGNORANCE"!**

**You wanted your day in court you're about to get it but not because of anything that may or may not have happened to your "legal aged" son but because of your own ignorance. Parents - from a legal standpoint - once your son turns 18 years old -you no longer have a legal right to speak for him or on his behalf. He's no longer a minor legally!**

**▲ The University of South Carolina and interfered in the investigation and did nothing to help the victim with intentions to only protect its Football Program.**

See Gamecock Nation responses on links below.

1. If it's an on-going investigation, how does so many know about the information about lawyers and contacts.
2. The silence of the police department to our family.

◆ Comments by: SCFlabbergaster

Posted on Sep 7th, 2020, 8:41 PM,

This is gone already.

What did she say? (I'm guessing that the University is trying to keep a lid on comments like the first guy should have been advised to do)

<https://247sports.com/college/south-carolina/board/44/Contents/13-players-involved-in-fight--151173976/?page=>

843ish said... (original post) [https://twitter.com/wyman\\_mom/status/1303124806527864833?s=21](https://twitter.com/wyman_mom/status/1303124806527864833?s=21)

◆ Comments by CarolinaEmpire

Posted on Sep 8th, 2020, 6:51 AM,

WestTNGamecock said... (original post)

How certain of this are you?

1. Have we already pulled the footage?
2. I hope we can disprove everything he says.
3. Also, has this aired on tv yet?

◆ Comment by: Loranza80

Posted on Sep 7th, 2020, 10:10 PM.

1. I've spoken to a couple parents, and they are pissed. They are claiming self-defense and said if the father wants to push it, they will too.

◆ Comment by: DelphCock

Posted on Sep 8th, 2020, 1:32 AM,

TOS saying several parents of our players have already hinted at filing lawsuits,

1. so I'd say this is probably going to work out in our favor.
2. I do feel bad for these guys who have had their names slandered by this son-pimping, limelight seeking \*\*\*\*-clown.

## **SLED**

### **Fifth Circuit Solicitor.**

Your guilty plea: Lets understand why

### **Solicitor weaponized**

When you weaponize the solicitor against an 18-year-old that's not what justice looks like.

**Plaintiff states the University of South Carolina of South Carolina initiated its Blue Wall of Silence**

1. University of South Carolina
2. USCPD
3. SLED-South Carolina Law Enforcement Division
4. Fifth Circuit Solicitor

**Plaintiff states that the Fifth Circuit Solicitor is in collusion with the active Blue Wall of Silence.**

**Plaintiff states the Blue Wall of Silence was to illegally frame Kamarah Reynolds-Hall.**

1. Lured to be attacked at 650 Lincoln Athletic Dorms
2. Attacked at 650 Lincoln Athletic Dorms
3. False Official Statements
4. Obstruction of Justice-Tampering with statements
5. Obstruction of Justice-Fabricated
6. Concealment of Jammie Robinson that admit assault.
7. Concealment of Dominic Hill that admit assault.
8. Concealment of Dominic Hill that admit assault.
9. Re-Enactment of Assault

## SOLICITOR

The solicitor has a lot to do with this deformation.

1. Solicitor weaponized
2. Role was to tarnish my reputation even more.

Public index shows 3 case numbers listed

## Food chain for justice

### Double-Edged Sword-Controlled Outcome

Plaintiff states the defendant refusing to say Kamarah was lured to 650 Lincoln Athletic Dorms.

Plaintiff states the defendant refusing to say Kamarah was lured and attacked at 650 Lincoln Athletic Dorms.

Plaintiff states the Judicial system did not follow State Law: SC 16-3-210 Assault and Battery by mob.

Plaintiff states the Judicial system did not follow State Law: SC 16-3-600 (D) Assault and Battery.

Plaintiff states the University of South Carolina obstructed justice and did not follow State Law: SC 16-3-210-Assault and Battery by Mob and SC 16-3-600 (D) Assault and Battery

Plaintiff states the University of South Carolina concealed evidence and did not follow State Law: SC 16-3-210-Assault and Battery by Mob and SC 16-3-600 (D) Assault and Battery

## Fifth Circuit Solicitor treatment of Kamarah Reynolds-Hall

Kamarah Reynolds-Hall was treated Un-constitutionally.

1. **Arrest/Charge-Malicious Charge**
2. **Charged: Trespass:** Solicitor knows the truth.
3. **No Charges: Trespass: Solicitor knows the truth.**
4. **Charged: Misdemeanor:** Damage to property. He is not seen damaging any property listed to pay.
5. Criminal Record:
6. Fined: \$2000
7. Evidence
8. **Fabricated Evidence**
9. **Omitted Evidence**
10. **Concealed Evidence**

## Double Edged Sword-Controlled Outcome-to favor the USC

Fifth Circuit Solicitor treated (6) attackers differently

1. **Did not-Arrest Football players 2020 Football Players**
2. Jammie Robinson-Mob Leader
3. John Dixon
4. Dominic Hill
5. Joseph Hunter
6. Rashad Amos
7. Jahmar Brown
8. Co-conspirators are listed below
9. AJ Lawson-2020 Basketball Player
10. Javon Benson-2020 Basketball Player

- **No arrest of the attackers**
- **The attackers treated different by USC-USCPD-Fifth Circuit Solicitor**
  1. **No arrest**
  2. **No charges**
  3. **No warrant**
  4. **No jail for 24 hours**

**USC Controlled Outcome of the Judicial System-USC Basketball Players and 2 others for**

**luring the victim**

**Double Edged Sword-Controlled Outcome-Investigation**

Plaintiff states that for the police investigation of the assault case#.....

Plaintiff states that for the police investigation of the criminal case#.....The outcome was deliberate to charge Kamarah Reynolds-Hall.

Plaintiff states that for the police investigation of criminal case#.....The outcome was deliberate to have him arrested only.

**August 23, 2020-**

**Aug 28, 2020.** Major Miles confirms our son was chased and attacked.

**October 10, 2020.** Arrested without victims.

**October 12, 2020.** Listed him as not being a victim. See Graf. Case Management

**December 2020.** Jammie Robinson transferred to Florida State without charges

**December 2020.** John Dixon transferred to Penn State without charges.

**January 2021.** No charges for the assault. Deputy Solicitor Dan Goldberg.

**March 2021.** Discovery. USC and the Fifth Circuit Solicitor

**April 2021.** Travis Hall

**Identifies all the players that were involved in the assault by mob of his son.**

**June 2021.**

**Attorney General (DCVC) The Department of Crime Victim Compensation (DCVC) has deemed him a victim pursuant to Section 16-3-1170(4) of the South Carolina Code of Laws**

**October 2021.**

**Father Film.** The film confirms the Aug 2020 account from USC PD Major Miles which shows he is a victim that was attacked in stairwell and then chased and attacked.

Nov 2021.

**We Beat You-Jammie Robinson**

**Aggravated Assault and Assault by Mob**

**Jammie Robinson statement of Aggravated Assault and Assault by Mob**

**John Dixon is seen chasing grabbing and attacking Reynolds-Hall**

1. Captured Reynolds-Hall so the mob could continue the assault that started in the stairwell and continued in the assault in
- 2.
3. the parking garage.

**Dominic Hill statement of Aggravated Assault and Assault by Mob**

1. **Jasmine Alexander-Coleman statement** says Reynolds-Hall was **struck in the face.**
2. **Aggravated Assault. Dominic Hill states he hits and slaps him in the face.**
3. **Joey Hunter demonstrates** how Reynolds-Hall held his face and eye.

**John Dixon is seen chasing grabbing and attacking Reynolds-Hall**

1. **USCPD Graf.** John Dixon says it was a fight involving multiple people.
2. **USCPD Graf. 13.25 ▲** John Dixon says Reynolds-Hall homeboys tried to hit him and missed.
3. **USCPD Gallman.** John Dixon says the only people involved in (assault by mob) the altercation was him, Jammie Robinson, and Dominic Hill. It was only Reynolds-Hall being assaulted. Addison Black and Israel was not involved.
4. **USCPD Gallman.** Dominic Hill admits it was him, John Dixon, and Jammie Robinson that assaults Reynolds-Hall
5. **USCPD Gallman ▲** John Dixon grabs Reynolds-Hall
6. **USCPD Gallman ▲ Jasmine** Robinson says Addison Black came to the door with Reynolds-Hall to let her in.

FORM 7

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

RECEIVED  
APR 10 2025  
SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Daniel Coble, Circuit Court Judge

Appellant Case No. 2024-001242  
Case No. 2023-CP-400-4408

University of South Carolina  
Holder Properties

Respondents,

v.

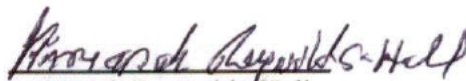
Kamarah Reynolds-Hall

Appellant.

PROOF OF SERVICE

I certify that I have filed the **Reply Brief** to the attorney of record for the **University of South Carolina** David Allan DeMasters and Damon Christian Wlodarczyk PO Box 11412 Columbia, South Carolina 29211 and **Holder Properties** Catherine Garbee Griffin by depositing a copy of it in the United States Mail, postage prepaid, on April 10, 2025 addressed to the attorneys of record, **David Allan DeMasters** PO Box 11412 Columbia, South Carolina 29211; **Damon Christian Wlodarczyk** PO Box 11412 Columbia, South Carolina 29211 and **Catherine Garbee Griffin** 3710 Landmark Drive PO Box 8057 Columbia, South Carolina 29202.

April 10, 2025

  
Kamarah Reynolds-Hall  
5 Alatera Court  
Columbia, South Carolina 29229  
(803) 237-6057  
PRO SE