

**RECEIVED****Apr 24 2025****SC Court of Appeals**

March/24/2025

Via email South Carolina Court of Appeals  
1220 Senate Street, Columbia, SC 29201  
803-734-1890  
E-filing: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

Catherine S Harrison, Chief Deputy Clerk  
The South Carolina Court of Appeal Post Office Box 11629

Cc[Via E-mail  
Ms. Ellore A Gains Esquire  
Hood law firm  
172 Meeting Street,  
Charleston, SC 29401  
email: info@hoodlaw.com

Mr. Evan M Sobocinski, Esquire  
172 Meeting Street,  
Charleston, SC 29401

*Appellant /Plaintiff Proof of Hood Law Firm; (legal Malpractice & Discrimination)*  
Exhibit (A)

Dear: Catherine S Harrison, Chief Deputy Clerk the Court has already received the \$50.00 court fee for the Amended brief or alternative Settlement Conference.

*Since Appellant /Plaintiff case would have been dismissed if the court did not respect the Court Rules about Disabilities, I am Hopeful You will Not Disregard this new Evidence being Submitted.*

Mr. Evan M Sobocinski, Esquire & Ms. Ellore A Gains Esquire

Are Both unethical Racist Attorneys that have Withheld Valuable information that My allies in my new Partnership have debriefed me on Hanahan police Department Has taken care of their internal problem Ellen Lanphere the arresting Officer has lost her Badge for The Death of the Victim & False arrest of Muhammad Nathaniel Wilson Pro se  
Cassie brooks the officer who approved it is no longer working with Hanahan police department

Rick Gebhardt Chief of Hanahan Police Department

*Is an (Honorable Man) who told me Valuable Information to Show me he Do not Agree with Hood Law Firms Legal Malpractice So Hanahan police department has giving Appellant /Plaintiff Justice & Conformation after a Thorough investigation I have identified the Problem & reason for delay of Settlement;*

*(Hood Law Firm) & the (City of Hanahan) This has become a matter for the (Office of Disciplinary Counsel:*

## To Whom this May Concern I have Notified Mayor

(Mayor Christie Rainwater & Served her with a Copy of My Mental health Disabilities & Statement of Claim she is aware of Hood Law Firm Discrimination against Mentally Disabled Black Men; she is aware That a 9-year-old Victim Died Because of the Officer who lost her Badge Misconduct who works for her City of Hanahan She attempted to Cover it up By Getting Rid of the Evidence.

Hood Law Firm Will Continue to delay Settlement So I would like all evidence to be on Court record If Hood law Firm would Not Have Done Unethical Conflict of interest this Would have been a open & Shut case in Front of a Non bias impartial Jury.

(Mayor Christie Rainwater & Hood Law firm You are hereby Notified that the public Will Know Every detail of the City of Hanahan Covering up Corruption & the death of a Victim & Enabling Hood Law Firms *(legal Malpractice & Discrimination)*

So, With Faith Humility And respect for the Court of Appeals Guidance the Appellant /Plaintiff anticipates some form of relief since both Berkeley County Judges Disqualified from making any order Preventing a Trial. The \$50.00 for the Motion to reinstate is included with this Letter & Motion.

I will also send an additional \$50.00 for the Motion for a settlement agreement if the court wishes, Appellant /Plaintiff has no issues with paying for any mistakes I am a Man of accountability it is not the courts fault I have Cognitive impairment from my emotional distress inflicted by Hood law firm & Berkeley County Conflict of interest & judicial Misconduct.

*Appellant /Plaintiff requires clarification on all items that must be included inside of the record of appeal.*

Due to Rick Gebhardt Chief of Hanahan Police Department Partnership in my new Organization Creyola Tri County Positive Police Community Outreach Partnership Program that includes Berkeley/Dorchester/Charleston/ I am seeking to Partner Up with

North Charleston/Hahahan/Charleston/Summerville/Goose creek /Mount pleasant  
 For Public Engagement I wish to Exonerate every Negative Thing in my Amended Brief out of respect for my new Partner This Case is Now a judicial Investigation for Counsels involved until Hood law Firm Decides to see You Will Not Win This, I can Afford Court fees Eventually we will make it to trial & Hood Law Firm own Client has Turned Against Them

Attorneys Sticking Together is the only reason This case has Not been Settled No cause of Action can happen until the Court of appeal Refuse to Give: The Mentally Disabled Appellant /Plaintiff Relief (because the Paperwork was not Filed Properly)

I hope the Court of Appeal do not Disregard Hood Law Firms Unethical Behavior because the Judge is also a Counselor, I pray the Court of appeal do what Rick Gebhardt Chief of Hanahan Police Department did Don't Follow Hood Law Firm & the City of Hanahan Mayor Covering Up Corruption;

### **15-3-40** Exceptions as to persons under disability

How does this section apply?

- The time of the disability is not part of the time limit for starting the action.
- The disability cannot extend the time limit by more than five years, except for infancy.
- The action must be brought within one year after the disability ends.
- For example, if property damage occurs when the owner is under 18 or insane, they have one year to file a lawsuit after they turn 18 or are (**declared sane.**)

*Appellant /Plaintiff has already submitted Dorchester/Charleston County Mental Health Evaluation.*

*Valid Point For (unethical hood Law firm Future Defendant)*

- A cause of action is a set of facts or circumstances, supported by legal principles, that give rise to a right to seek a remedy (like damages or an order from the court).
- It's the legal theory upon which a plaintiff (the person filing the lawsuit) brings suit against a defendant (the person being sued).
- It identifies the specific wrong or injury that the defendant is alleged to have caused.

The action must be brought within one year after the disability ends

*Exhibit (a) Proof of Emotional Damages (see) Charleston County Mental Health DSM-IV*

*Diagnosis 05/30/2023 Legacy spec popn: PSYCHIATRICALY DISABLED*  
 07/15/2024 DSM-IV Psych Diagnoses: 296.80-Unspecified bipolar and related disorder  
 300.00-Unspecified anxiety disorder  
 301.7-antisocial personality disorder  
 780.52 Insomnia disorder  
 298.9 Unspecified psychosis not due to a Substance or Known physiological condition  
 312.89-Conduct Disorder unspecified onset  
 296.34-Major Depressive Disorder, Recurrent, Severe with Psychotic features

*Full Disclosure Appellate/Plaintiffs Positive Incentive Address Mental Health issues*

*Valid Point For Court of Appeal: Appellant /Plaintiff has intellectual disabilities and gets confused subsequently Hood Law Firm believes because all of South Carolina Attorneys discriminate & Bias toward Black Men With Disabilities, they can use Dilatory tactics thinking Appellant /Plaintiff will Give Up But This Sample of the Final Brief Will show that its only going to get Worse & Hood Law Firm will be served with a Copy of an Notice of claim official Complaint if the Court of appeal offers Appellant /Plaintiff no form of relief; The Supreme Court/District Court will be next Step a total of \$900.00 in court fees that will be added for Hood law Firms Debt to plaintiff for Legal Malpractice Mental disabilities Discrimination.*

*A Copy of the Final Brief Exhibit (a) will be sent to Live 5 News & other Media Sources to expose to the public about Berkeley County Judges Getting away with Judicial Misconducts & How Hood Law Firm Profits Off Police Misconduct's on the Mentally disabled Black Men the details About Hanahan police Leaving a Black 9-year child to Die because She was Left with an Unfit Mother who was abusive*

*After locking up a credible Witness for being Mentally Disabled by Refusing to Contact Child Protective Service.*

*Appellant /Plaintiff is currently seeking to find other Potential Victims of Hood law Firm & Berkeley County Judges, (Judge Young) & (Judge McCoy) Judicial Misconducts for a Class Action Law Suit Under the ADA disabilities Act.*

*Appellant /Plaintiff has no problem paying the court for any accommodation's to fully consider a relief I have faith in the court of appeal integrity so I will gladly pay for the courts time;*

*Appellant /Plaintiff is Currently Suffering and Would Gladly Show Hanahan Police Appreciation if they do not Fight the Court of appeal Relief if so, we do not need a Settlement conference & the Appellant /Plaintiff Will Focus all Time, Money & Energy*

*towards Humiliation & Justice towards Hood Law Firm & Berkeley County judges.  
The Amended Final Brief Will be only Complaints Dedicated to Justice for The Potential  
Victims of Hood Law Firm & Berkeley County Judge Young & Judge Mccoy*

*Please Clarify what needs to be added to the record of appeal please review the  
amended brief submitted with motion to reinstate*

*Respectfully, humbly submitted Muhammad*

*Wilson Pro Se*

*In Town Suites 8082 Rivers Ave, Room 309  
North Charleston SC 29406  
(843)-468-3432 creyolab@gmail.com*

*The State of South Carolina  
In The Court of Appeals*

*Appeal from Berkeley County  
Court of Common Pleas*

*Judge Jennifer B McCoy, Circuit Judge*

*Case No. 2022 CP-08-02508  
Appeal No. 2023-001837*

*Muhammad Nathaniel Wilson Pro Se*

*Appellant,*

*Vs,*

*Hanahan Police Department &*

*Other Law Enforcement Officials*

*Respondents,*

*(Appellant)*

*(Motion to Reinstate Motion for Settlement agreement)*

**15-3-40** Exceptions as to persons under disability

1. Exhibit A: Plaintiffs only accommodations for courts
  - (A). **Section 15-3-40:** Exceptions as to persons under disability.
  - (B). Rules 38 - Jury Trial of Right, S.C. R. Civ. P. 38
  - (C). Notification of any discrepancy's & time to Process information

*Exhibit (a) (Amended Final Brief of Appellant)*

*14th amendment/ 4th amendment/ Rule 413 SCACR / **ADA Title II / Section 15-3-40** Exceptions as to persons under disability Legal Malpractice Mental disabilities discriminations Class Action lawsuit: Full Disclosure this Final Brief is to be used for Live 5 News & Media public access, to be used for: the (Office of Disciplinary Counsel/District Court/Supreme Court)*

*(Appellant /Plaintiff General Theme: who is Above the Law?)*

This Brief contains consolidated Evidence (via Google) after doing due diligence; (3 Complaints) in one statement of claim consolidated evidence & *Burden* of proof: Court Rules, Civil Rights & Laws disregarded by hood Law Firm

*Appellant /Plaintiff Statement of Claim*

**1: Who is above the law valid point:** *14th amendment/ 4th amendment/ Rule 413 SCACR / **ADA Title II / Section 15-3-40** Exceptions as to persons under disability A Right Preserved. The right of trial by jury as declared by the Constitution or as given by a statute of South Carolina shall be preserved to the parties inviolate. Issues of fact in an action for the recovery of money only or of specific real or personal property must be tried by a jury, unless a jury trial be waived*

*(a) Respondents/Defendant's Attorneys: (Hood Law firm) Believes their clients are above the law and has displayed Unethical Misrepresentation behavior that includes Conflicts of interest.*

*(b) Negative Reinforcement: Incentives for (Hood Law firm) & (Berkeley County) (Legal Malpractice Mental Disability Discrimination) Class Action Law Suit*

*(c) The Burden of proof: Both Judge Young & Judge McCoy are Employees, of (Berkeley County) & Hood Law Firms represents Both (Berkeley County) & Respondents/Defendants Hanahan Police Department & Other Law Enforcement Officials!*

*(d) Calling all Victims of (hood Law firm) & (Berkeley County): We are seeking Justice For all potential Victims of Judge Young & Judge McCoy's Judicial Misconducts!*

**(e) South Carolina Code Section 15-3-40 is about the statute of limitations for actions brought by people who were under a disability when the cause of action occurred. This includes being under 18 or being insane.**

**How does this section apply?**

**The time of the disability is not part of the time limit for starting the action**

*Valid Point For (Hood Law Firm) Until (Appellant /Plaintiff settles this Dispute that Hood Law Firm has delayed for Profitable purposes Appellant /Plaintiff is impeded from receiving Mental Health treatment in order for the Doctor to declare Appellant /Plaintiff Sane.*

*Exhibit (a): (see) (Charleston County Mental Health Document's submitted) indisputably: by Hood Law firms own Admittance this information was prevented from being introduced into Trial Court Because of Hood Law firm unethical Legal Malpractice Discrimination towards Mentally Disabled Black Men.*

**2: To establish a legal malpractice claim, a plaintiff must prove four key elements: duty, breach, causation, and damages.**

**Here's a more detailed explanation of each element:**

- **Duty:**

**The plaintiff must demonstrate that the attorney owed a duty of care to the client, meaning the attorney had a legal obligation to act with a certain standard of care.**

*Burden of proof Key points Hood Law firm's: Civil rights Experience & Legal knowledge experience:*

*(a) (Legal Malpractice Key Element's) Hood law firm: enabled (Client Berkeley County) Judges to not Respect Their Oath, when they advised them to not recuse themselves: When Hood Law Firm Requested the Summary Judgement in spite of Knowing Appellant /Plaintiff is Mentally Disabled.*

*(b) (Mental Discrimination Key Element's) (One officer Wanton Behavior) & subsequently the false arrest of a Creditable Witness resulted in a Dead Child potentially murdered by the Suspect the Victims Mother, just like Susan Smith's kids!*

- **Breach:**

- (c) The plaintiff must show that the attorney breached their duty of care by failing to act as a reasonably competent and prudent attorney would have acted in the same circumstances.

Emotional Distress Key Element: Hood Law Firm Has Prevented all Opportunities of a Fair impartial unbiased Trial resulting in the *Appellant /Plaintiff receiving irreparable emotional harm*

(Emotional stress Damages): *Appellant /Plaintiff can't Afford to Receive Mental Health Treatment for Damages received;*

*(d)Legal Malpractice key element: Hood Law Firm has used unethical dilatory tactics to pro long the Appellant /Plaintiff from receiving Payment of Debt because of discrimination towards Mentally Disabled black men*

- 
- **3: Damages:**

The plaintiff must prove that they suffered actual damages or injuries as a result of the attorney's negligence, which are often financial in nature.

- (a) (Hood Law Firms (Only Argument for not paying Debt) is Statue of limitations.

(b)based on *(Appellant /Plaintiff) Proof Of disability the (Appellant /Plaintiff is unbarred Exempt*

**Undisputable & Indisputable Burden of Proof Evidence: the courts can't disregard that** invalidate, (Respondent's/Defendants) Statute of limitations argument!

the Final Amended Brief Contains all of the Gross Negligence & Wanton behavior in the Form of Civil Rights Violations

*(Rule 413 SCACR / ADA Title II / Section 15-3-40)*

- (3) **Hanahan police Settlement Debt.** eight million, seven hundred eighty-nine

*(a)Appellant /Plaintiff based this amount off the number of hours held for the ransom of (\$75,000 inside of Berkeley County Jail)*

*(b) Conflict of interest is defendants (Berkely county) profited from;*

*(c) (Hanahan Police Departments) False arrest & subsequently*

*(d)(Berkeley County) provided ineffective incompetent counsel though Berkeley County public defender office & exhibits will validate (Appellant /Plaintiff argument*

- (e) The Creditor agrees as part of this Agreement they shall be accepting the last payment for the satisfaction of the Present Debt, hereinafter known as the "Settlement Debt". This Settlement Debt shall be in the amount of \$\_two million four hundred thirty-six thousand or \$2,436,000.
- (f) . *(Appellant /Plaintiff incentive invest in Non-Profit Music Outreach to Provide Solutions that will encourage the Communities to Respect the law & cooperate with Hanahan Police Department & Allies in Blue*
- (g) (\$600,000) Will be used to Purchase Property, Transportation & Equipment for the Non-Profit Organization Creyola Boss 3 % Nation Music Outreach
- (h) Dedicated to create Solution's to Domestic Violence & Mental health Issues
- (i) Funds will be used to Collaborate with Charleston County Mental Health) Encouraging people to Get help.
- (j) (Creyola Boss 3% Nation Music Outreach) Program incentive: Working with Local Law Enforcement & Getting Mental health Treatment at Dorchester Charleston County Mental health
- (k) Money Will Be Donated to assist Housing & Mental health Programs

(\$400,000) Will be used to relocate & get long term Mental health treatment For Damages

(Punitive Damages): \$50,000 Include \$25,000(Berkeley County Ransom) Bail Money & Money Spent for Hotel Accommodations at Intown Suit For 5 years & Counting

4: Valid Points the Courts must consider: The "burden of proof" in a legal context is the obligation a party has to prove their claim or defense by presenting sufficient evidence to persuade the judge or jury

*(A)Hood Law Firm & The Facilitation of Extortion in the Form of Police Misconduct & False Arrest where Berkeley County makes Money off High Ransoms*

*(B)(Berkeley County) Using Incompetent & infective Public Defenders to Force Innocent Mentally Disabled Black Men to be coerced into pleading guilty when they are innocent.*

*(c) (Judge Jennifer B Mc Coy, & Judge Young) How Misguided is Berkeley County Judges? How many other precedented cases was dismissed? How many other Victims of Hood Law Firm, Berkeley County & Hanahan Police Department Extortion Operation? Unethically Hood Law Firm Profits Discriminates & take advantage Of Mentally Disabled Black People this Final Brief will hopefully instigate a **Section 15-3-40: Exceptions as to persons under disability***

*Discrimination using Unethical Behaviors to Dismiss Cases of officer Misconduct Class Action Law Suit or a Full Judicial Investigation*

- *Who is Above the law? Final brief Respondents, Speculation, based case includes discrimination, disregard for Multiple Civil Rights, Conflict of interest, & judicial Misconduct, the higher court may overrule the lower court's decision, which means the higher court sets aside the lower court's judgment.*

- A court can generally only overrule decisions of lower courts because of the doctrine of precedent.

## 5: ADA Title II: State and Local Government Activities

Title II covers all activities of State and local governments regardless of the government entity's size or receipt of Federal funding.

- (a) *This is an official Notice of Claim for Legal Malpractice mental health disabilities Discrimination.*
- (b) *Emotional Distress Damage was inflicted because of Hood Law Firm's (Conflict of Interest), & (Berkeley County Judges) Judicial Misconduct*
- (c) *Burden of Proof: Judge Young & Judge Jennifer Mc Coy Orders to dismiss*
- (d) *No Judicial Disclosure, Total Contempt for Canons of Judicial Conduct & Lack of respect for Judicial ethics codes,*
- (e) *South Carolina Code Section 15-3-40 is about the statute of limitations for actions brought by people who were under a disability when the cause of action occurred. This includes being under 18 or being insane.*

How does this section apply?

- The time of the disability is not part of the time limit for starting the action.
- The disability cannot extend the time limit by more than five years, except for infancy.
- The action must be brought within one year after the disability ends.
- For example, if property damage occurs when the owner is under 18 or insane, they have one year to file a lawsuit after they turn 18 or are declared sane.

*Burden Of Proof Exhibit (A) Due to Hood law Firm collaborating with Their Former Client Berkeley County & Impeding this Settlement the plaintiff Muhammad Nathaniel Wilson has Continued to suffer irreparable Mental health Damages;*

*(b) The Department of (Charleston County Mental Health) Documentations will prove that the Plaintiff has been Diagnosed Insane & placed in Multiple Mental Hospitals Since this precedented case*

*(c)Appellant /Plaintiff is Currently Seeking Damages for \$1000,00 per each day that Hood Law Firm & Berkeley County has Forced Appellant /Plaintiff to deal with the case after 08/15/22(the day Judge Young Failed to Recuse himself) or Disclose Conflict of interest,*

*(d)Since Hood Law Firm Attorneys Represented Both Berkeley County & Hanahan Police department, all 3 parties involved owe \$1000, 00 per each day until settlement agreement between Hanahan Police Department & the Plaintiff is reached.*

*(e) The Respondent Hanahan Police Owes for the 8789 hours of Confinement or \$8,789,000 but I'm willing to settle per day of emotional distress or 2,436 days at \$1000, 00 per day \$2,436,000. total estimate of damages.*

*(f) 08/14/2018 is the Appellant /Plaintiff first day of Emotional Distress inflicted by Hanahan Police Department*

*(G) 08/15/22 is the Appellant /Plaintiff first day of Emotional Stress 955 days and counting inflicted because of Hood Law Firm's Client Berkeley County Employee Judge Young. \$955,000*

6: (Who is above the law?): Upholding Both judges' previous decisions could undermine public confidence in the South Carolina legal system.

The deeper issues of all Questions presented for the court of appeal, District Court, Supreme Court, The A.D.A & office of Disciplinary

(a) This Final brief is 3 separate Complaints consolidated against all 3 Parties involved includes Gross Negligence, Legal Malpractice, Mental health disabilities Discrimination, that includes Unethical behaviors by Disregarding Conflict of Interest to avoid a fair impartial non bias Jury by a Trial Court facilitated by  
*Defendants: (Hood Law Firm & Berkeley County)*

*Judicial Misconduct & (Conflict of Interest) Burden of Proof) Exhibit (b)*

(b) Judicial misconduct by When judicial misconduct is present, courts can overturn earlier decisions based on the principle of "judicial review," which allows them to examine and potentially overturn decisions if they find them to be clearly erroneous, based on legal errors, or if there was significant procedural misconduct, including instances of judicial misconduct.

Key points to remember:

- **Stare decisis:**

(c) While courts generally follow the doctrine of "stare decisis" (meaning to stand by things decided), which encourages adherence to precedent, this principle can be overcome in cases of serious judicial misconduct, where upholding the previous decision could undermine public confidence in the legal system.

- **Burden of proof:**

To overturn a decision based on judicial misconduct, the party seeking to do so must present compelling evidence demonstrating the misconduct and how it affected the outcome of the case.

- **Factors considered:**

(d) Courts will evaluate the severity of the alleged misconduct, whether it was intentional or negligent, and the potential impact on the fairness of the original proceedings when deciding whether to overturn a decision.

Examples of judicial misconduct that might lead to overturning a decision:

- **Bias or prejudice:** A judge exhibiting clear bias towards one party in the case.
- **Exhibit: (b)**
  - : Hood Law Firm was engaging in private discussions with both Judge Young & Judge McCoy at Both Judgements Hood Law Firm was observed by the Plaintiff holding a private discussion after the plaintiff was leaving
  - 
  - **(a) Ex parte communication:** A judge engaging in private discussions with one party without the knowledge of the other.
  - **(b) Failure to disclose conflicts of interest:** Not disclosing a personal connection to a party in the case.
  - **(c) Improper influence:** A judge being influenced by outside factors that could affect their decision.

### **7: Burden of proof: Appellate is Unbarred & exempt from statute of limitations**

**(a) Section 15-3-40:** Exceptions as to persons under disability.

If a person entitled to bring an action mentioned in Article 5 of this chapter or an action under Chapter 78 of this title, except for a penalty or forfeiture or against a sheriff or other officer for an escape, is at the time the cause of action accrued either:

(1) within the age of eighteen years; or

(2) insane;

the time of the disability is not a part of the time limited for the commencement of the action, except that the period within which the action must be brought cannot be extended:

(a) more than five years by any such disability, except infancy;

**(b); Indisputable Legal Malpractice: Burden of proof: Hood Law Firm Unethically Represented Both Berkeley County & Hanahan police Department**

the Conflict was never disclosed subsequently Hood Law Firm is Both Parties Legal representation, so they are liable for any forms of Misrepresentation on their client's behalf.

**(c) Berkeley County Employs Both Judge Young & Judge *Jennifer B McCoy*,**

## Burden of Proof Recusal Requirements

- (a) An official with a disqualifying conflict of interest may not make, participate in making, or use his or her position to influence a governmental decision. When appearing before his or her own agency or an agency subject to the authority or budgetary control of his or her agency, an official is making, participating in making, or using his or her position to influence a decision any time the official takes any action to influence the decision including directing a decision, voting, providing information or a recommendation, or contacting or appearing before any other agency official. When appearing before any other agency, the official must not act or purport to act in his or her official capacity or on behalf of his or her agency.

Certain officials (including city council members, planning commissioners, and members of the boards of supervisors) have a mandated manner in which they must disqualify from decisions made at a public meeting (including closed session decisions) and must publicly identify a conflict of interest and leave the room before the item is discussed.

(c) Appellate/Plaintiffs Full Disclosure for Respondents Hanahan police Department, Hood Law firm & their Codefendant Berkeley County.

Positive enforcement Incentive: This amended final brief can be edited to limit media & Public View of hood Law firm to Show appreciate for minimum of 2-million-dollar Relief reparation Relief for all 3 Parties involved paid through the South Carolina reserve Funds.

- (d) *Appellant /Plaintiff can* focus the case More on the Lack of Sgt Ellen Lanphere not contacting Child Protective Service & Let The arresting Officer in Charge Sgt Ellen Lanphere take Full responsibility of the Emotional Distress.

*Appellant /Plaintiff Positive relief incentive: Appellant /Plaintiff will* Sign a Non-Disclosure Act that will Guarantee *Appellant /Plaintiff* never Speak negatively or seek any form of Civil Suit or complaint against Hood Law firm or Berkeley County.

*(Appellant /Plaintiff did* Due Diligence via google: Conflict of interest valid points)

Both Judge Young & Judge McCoy receive salary by Berkeley County: Hood law firm Clients

(e): Mental Discrimination Valid points: failure to settle in a timely result will only result in a Judicial Investigation implicating Hood law Firm in Coordinating & Facilitating Violating Mentally Disabled Black American's Civil Rights through Extortion

(f) Mental Health Disabilities Potential Victims Class Action Suit against Berkeley County & Hood law Firm

everything inside of this Final Brief is indisputable the respondents have had over 5 years to deny the allegations it is impossible.

- (f) Live 5 News & any press related Media will have a Copy of all Evidence in this Brief Since Hood Law Firm has already responded

- (g) this brief is meant to inspire a uproar in the Media & Internet By exposing all the Evidence to the public
- (h) *Appellant /Plaintiff is willing seeking to* collaborate with all Black lives matter & any Civil rights activists for mentally Disabled Law-Abiding Black Americans.
- (i) Thankfully Because of My allies in Law enforcement :(North Charleston) & (Charleston County police) I don't want to Expose this information to the Public & it would be more beneficial to my Non-profit organization to work with Hood Law firm & Berkeley County as well as Hanahan police to encourage Respect for the Spirit of accountability.
- (j) *Appellant /Plaintiff Message* Thank God for all Blue Lives Who died or Risked Their Lives in a Anti domestic Violence Concert Where Appellant /*Plaintiff will* Market Originally written song and Show appreciate by encouraging People to cooperate With Law Enforcements.

Appellate/Plaintiffs; Emotional Distress damages Proof Diagnosis Dates: Evaluated by Charleston County Mental Health after the (Appellate/Plaintiffs was released from Psychiatric treatment inside a Mental health facility Hospital for Homicidal thoughts)

*Exhibit (a) Proof of Emotional Damages (see) Charleston County Mental Health DSM-IV Diagnosis 05/30/2023 Legacy spec popn: PSYCHIATRICALY DISABLED*

07/15/2024 DSM-IV Psych Diagnoses: 296.80-Unspecified bipolar and related disorder

300.00-Unspecified anxiety disorder

301.7-antisocial personality disorder

780.52 Insomnia disorder

298.9 Unspecified psychosis not due to a Substance or Known physiological condition

*312.89-Conduct Disorder unspecified onset*

*296.34-Major Depressive Disorder, Recurrent, Severe with Psychotic features*

*Full Disclosure Appellate/Plaintiffs Positive Incentive Address Mental Health issues*

*Muhammad N Wilson Pro Se*

*8082 Rivers Ave North Charleston SC  
(843)867-9789 creyolab@gmail.com*

Dear (Mayor Christie Rainwater);

My Name is Muhammad Nathaniel Wilson a former

Law-abiding Citizen Who previously lived in your city of Hanahan I am a  
mentally disabled Black Male; who attempted to be a Valuable Witness

August 14 2018 at (0624) that resulted in a False Arrest, & subsequently the  
call was made to remove myself from the indecent relationship that a Woman I  
was dating had With Her (9 year old Daughter Cabriya Lucas)

I had Suspected Sexual Abuse Because Bernadette Owens would always take a  
Shower With Her daughter & walk around Naked all day in front of her Prior to  
the Incident that resulting in me calling Hanahan Police. So I had previously put  
her out because of the Physical, Mental & Emotional Abuse that I witnessed.

(Cabriya Lucas) Confided in me that her Mother would always leave her  
with Strangers I could over hear Disturbing Conversations that was  
inappropriate.

While Inside the Bed Cuddling with a Naked Bernadette Owens I noticed  
the Child was in the Room Because Her Hand was feeling her Mothers  
breast & Her Mother was Wide awake Attempting to get me aroused so it  
made me upset, so I addressed the Victim being in the same Bed With us  
(While the Mother was Naked) with Anger Because of my PTSD & I have over  
30 years of mental health Problems, so I was afraid of Causing the Child  
Mental Harm by Hurting her Mother out of Anger.

At (0631) the DISP Time) Per city of (Hanahan Police Department)  
Incident ;Report( Sgt Ellen Lanphere) Did No Due Diligence on the  
Suspect & she took less than 5 minute's to Not only Not Contact Child  
Protective Service )to allow the Victim to be separated From the Suspect  
(The Mother)

But she did not prosecute her for anything she noticeably did on  
Camera.

Bernadette Owens Subsequently was Racist Hated Police & had  
Multiple Warrants for her arrest & had already lost 1 Son to Child  
Protective Service for Neglect & Child Abuse.

In The officer Footage She Told on Herself she because she knew

what she did would have required Contacting CPS.

Because of My Mental health Disabilities I was Incoherent, also Discombobulated so (ELLEN Lanphere) took advantage of (My Vagueness) to Fabricate My statement & Kidnap me using Breach of peace as a Reason for Placing Me in Cuffs subsequently I had a Severe Panic attack & Mental Break down While in Hanahan Police Custody & have Been Suffering Ever Since. Being held until 0740 for over 1 Hour (They Had the Chance to Call Child Protective Service) but They Did not care about the Victim.

I was Booked as Cabriya Lucas Legal Custodian for an Exceeding large amount of (\$75,000) (Sgt ELLEN Lanphere) Collaborated with the Suspect (Bernadette Owens): to coerce the Victim & the Judge to prevent me as a Witness from testifying in Court.

Hanahan Police Collaborated with Berkeley County public Defender to prevent me from Receiving My Preliminary hearing trying to coerce me to Plead Guilty to a Crime I did not commit providing me with Ineffective incompetent Council.

After being held for 366 days & Filing Multiple Motions to the court on my own behalf, they reduced it to \$25,000

(Positive Reinforcements Vs Negative Reinforcement Court of appeal (Target Points for Pending Relief)  
2.5 million vs over 9 million dollars in relief if the No relief is offered on a open & shut case that requires disqualifications to the only 2 Judges orders that is preventing Settlement & treatment For Emotional damages By Hanahan police, Berkeley County & Hood Law Firm

Stage 1 (The Court of appeal is considering the Settlement Agreement)

(a) 2.5 million Dollar Budget Plan for Creyola Boss 3 % Nation Music outreach Non-Profit Organization.

(b) Creyola Tri County Positive Police Community Outreach Partnership Program

(c) Positive Reinforcements Creyola Boss Nation 3% Music Outreach Non-Profit Organization

(Stay Strong Thank God Blue Lives Saves Lives Music Outreach Tour) Partnership with Dorchester/Berkeley/Charleston County Local Police Outreach officers Purpose; use Public Engagement & (Entertainment to Promote the Message).

Phase 1; (Settlement) all fund will be placed in the Non-Profit account Stocks will be available to purchase in the Future.

(a) Partnership with Every local Law-enforcement under Creyola Tri County

Positive Police Community Outreach Partnership Program  
 #1 North Charleston Police department will have (Full Jurisdiction)  
 #2 Hanahan Police department will have (Full Jurisdiction)  
 #3 Charleston County police will have (Full Jurisdiction)  
 #4 Berkeley County police will have (Full Jurisdiction)  
 #5 Goose creek police will have (Full Jurisdiction)  
 #6 Mount Pleasant police will have (Full Jurisdiction)  
 #7 Dorchester County will have (Full Jurisdiction)

(b) Entertainment: Celebrity Artists bring large amount of People in Community for Exposure;  
 Public Engagements gets the Kids & Community failure with their local law-enforcement

(c) Results; (Large amount of Unsolved Violent cases being Solved)

(Positive Incentive) to encourage the Youth to listen to Muhammad Boss Creyola Wilson.

(a) Creyola Boss 3% Nation Music outreach organization

(b) Recording Contracts, Sponsorships, utilities, Emergency housing Assistance & Donations will be Made for Mental Health treatment at Dorchester/Charleston County Mental health.

(c) Marketing & Promotion

Meet & Greet For any Law Enforcement who wish to join the Partnership Program at my Job Hooters location North Charleston free Food & drinks as well as Alcohol for any off-duty officer with a Badge 50 seats will be available for meet & greet.

Phase 2: (Implementation) (Hooters meet & greet)

(Discussion) Community safety enforcements using

(Negative reinforcement) incentives **Territorial joint jurisdiction**

Budget (1 million Dollars for all expenses)

(a) Purchas the Property for the (official Location) for Creyola Boss 3% Nation Music outreach organization

(b) Build a studio & office as well as a gym for mentorship Program for Youth that will include Martial arts training.

(c) Book Blake Shelton to perform the Song Originally Written for Relief proposal (Stay Strong) Thank God Blue lives save lives

**Prayer**

**for Relief**

WHEREFORE, *The Appellant/Plaintiffs* prays that the Court: grant judgment in favor of the Appellant and declare that Respondent/Defendant has violated, **Multiple Civil Rights & Conflict interest Rules that has Impeded the Plaintiff/Appellate ability to Obtain Legal Representation Forcing the Appellant/Plaintiffs a Mentally disabled Black Man to represent Himself (in spite of being deemed insane) by Department of Charleston County mental health**

The Emotional distress has increased because of the Respondents/Defendants attorneys Hood Law Firm; who used His Own Clients Employee to place an Order that rejected the right to a Fair Trial in spite of Court Rules because of Both Judges Refusing to Recuse Themselves under Hood Law Firms Misrepresentation. It Could Be Perceived as Judicial Misconduct.

The Appellate/Plaintiff Tried Settling with Hanahan Police Department in order to preserve Rule 413 SCACR Integrity & have submitted to the court a settlement agreement that includes an NDA that says the Appellant/Plaintiffs will never bring this matter to any court that includes any form of complaints!

The Plaintiff/Appellate Relief Incentives for Compensation so the Respondents/Defendant's feel Comfortable allowing the States South Carolina Reserve Fund to pay the Settlement Agreement amount

## **Exhibit: 1 Crayola Boss 3%Nation Non-Profit Music Outreach**

*Sample of Originally Written Lyrics that can be used to produce Country or a Gospel Song or Pop*

- (a) *Original Country Song Written by Muhammad Nathaniel Wilson aka Crayola Boss Title (Stay Strong) Thank God all Blue lives save lives the album*
- (b) *Entertainment Celebrity Headliner Note the plaintiff would like to sell this song & use Budget to Book Country Artist Blake Shelton, to perform for military, & law-enforcement during Major Public Engagement event that will the Community to Cooperate with Men & Women in Law Enforcement who are protecting and serving our country!*
- (c) *Title (Stay Strong Thank God Blue Lives Save Lives)*
- (d) *Lyrics Hook: (Our Nation Should Pray) & say (Thank God)*
- (e) *for all the blue lives !All around the World*
- (f) *Repeat & Chant (so we appreciate your service)*

*Verse: 1*

*I am Just a Law abiding American: WHO Love POTUS Trump with a Message that will Help make America Great again; we Support our (allies & Friends) (so we appreciate Your Service)*

*God Bless America the home of the Brave Blue (Lives)*

*(Never Forget Every Blue life that (Died)  
 Or (Risky Their Lives)/Protecting helping (Saving so Many Lives)  
 (Our Nation should thank God) and (Say Stay Strong)  
 To all Blue Lives repeat (Stay Strong) (Thank God) We Appreciate Your  
 Service/never forget all the blue lives who (gave their Lives)  
 Be grateful we can feel (Safe & Free)  
 God Bless America I am just a Humble Black American  
 (Law-Abiding Citizen)!  
 With a Message that (will help make America Great again)  
 (This for every Man & Women Veteran's/ I hope you stay strong I just  
 want to (encourage all allies & friends)  
 Men & women Veterans in Law enforcement!*

*Break Down (Stay Strong) Our Nation Should (Thank God)  
 Blue Lives save Lives) (all around the World)*

- (g) abiding American: WHO Love POTUS Trump with a Message  
 Help make America Great again; we Support our allies so We  
 appreciate Your Service*
- (h) Lyrics: First Verse: (I Love My Country) and I say it loud;*
- (i) & all my men & women in law enforcement military veterans  
 feel Proud; This Dedicated to every man or Women who risked  
 their life: in the Darkness let this be the Message to make you  
 shine bright; Having real Courage is make a sacrifice; I want to  
 say thank God;(Stay Strong) all blue lives saving lives;*
- (j) (Repeat: For Crowd To sing With Blake Shelton)*
- (k) (Don't Give up) (When Things Get Tuff); we wrote this to  
 encourage every( man & Woman in Blue)*
- (l) ( even the ones who don't like me,)(I still Respect You ; ) so we  
 appreciate everything you do; and can't comprehend what you  
 been through; Chant (so we appreciate your service) God Bless*

*President Trump/ he encourage us Law abiding citizens to stand up!*

*(m) (We love America enough is enough)!*

*(n) Brake down: Let encourage all the Men & Women in Blue repeat (Say we Appreciate everything you do)*

- *This case has Cost the Appellant/Plaintiffs Everything & seek immediate Relief from the Court of Appeal if the Court of appeal don't offer The Appellant/Plaintiffs any form of relief*
- *the Appellant/Plaintiffs will make all sensitive evidence on all 3 parties available to the news, the public media & to the District Court & file a Lawsuit Under the ADA Law & Report all official complaints to the Office of Disciplinary Counsel (ODC),*

*(Argument and citation of Authority Conclusion*

*In June 2021, the NAACP legal defense and education fund filed an Amicus brief in Thomson v Clark arguing that the lower courts requirement that malicious prosecution plaintiffs show that the underlying prosecution ended in a manor affirmatively indicating innocence undermines the ability of plaintiffs to seek remedy for baseless arrests and prosecutions*

*l.d.f briefs argued that because charges are often dropped with little explanation, requiring plaintiffs to address unjustified criminal charges adds an over whelming burden the brief also emphasized that the lower courts restrictive precedent would have a racially discriminatory impact as black people are disproportionately subject to unreasonable arrests and detentions*

*Berkeley county and Hanahan police department have a history of Racial discrimination towards Black Americans the system utilizes three types of juries: Investigative grand juries, charged with determining whether enough evidence exists to warrant a criminal indictment*

*Petit juries (also known as a trial jury),[2] which listen to the evidence presented during the course of a criminal trial and are charged with determining the guilt or innocence of the accused party; and civil juries, which are charged with evaluating civil lawsuits. The American system utilizes three types of juries:*

*Investigative grand juries, charged with determining whether enough evidence exists to warrant a criminal indictment;*

*petit juries (also known as a trial jury), [2] which listen to the evidence presented during the course of a criminal trial and are charged with determining the guilt or innocence of the accused party; and civil juries, which are charged with evaluating civil lawsuits.*

*the step towards accountability for law enforcement officers who detain people without probable cause, the Court rejected a requirement that Victims of such unconstitutional seizures point to an affirmative indication of innocence in the dismissal of their underlying prosecution, as Black Americans are more likely to be unlawfully arrested and detained, and Malicious prosecution claims are a critical mechanism for victims of such law enforcement abuses to obtain accountability*

*(Compensation equal reparations) Purpose Valid Points:*

*Unconstitutional arrest & Witness coercion sends a Bad message of compromised integrity inside the South Carolina legal System, & if the Court of appeal ignore Racial Mental Disabilities Discrimination Arrests & Judgments it would be a complete Contradiction to what the United States Supreme Court have stood for  
So many years!*

*Creyola Purpose is to use the Reparation Through Compensation to be a Productive Black American Law-Abiding Citizen & only wish to Prove to others that our System Still Works!  
Wherefore, based on the forgoing, the appellate respectfully submit the order asking for a Fair trial or Alternative settlement Agreement with the Respondents be Granted by the Court  
I would like to finish Editing Grammar Mistakes while court of appeal Reviews Copy Sent Through Gmail & Considers settlement agreement & will Send Final Copy signed in mail sincerely, & humbly Submitted Muhammad N Wilson Pro se*

*Muhammad Nathaniel Wilson Pro Se*

*In Town Suites 8082 Rivers Ave, Room 309 North Charleston SC 29406*

*(843)468-3432 creyolab@gmail.com*

*Respectfully\_\_\_ Muhammad Nathaniel Wilson Pro Se*

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**RECEIVED**  
**Apr 24 2025**  
**SC Court of Appeals**

*THE STATE OF SOUTH CAROLINA*  
*In The Court of Appeals*  
*FROM Berkeley County*  
*Judge Jennifer B McCoy*

—————  
*Case No. 2022 CP-08-02508*  
*Appeal No. 2023-001837*

*Muhammad Nathaniel Wilson Pro Se* \_\_\_\_\_

*Appellant,*

*V.*

*Hanahan Police Department & Other Law Enforcement Officials*

*Respondent,*

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*PROOF OF SERVICE*

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*I certify that I have served the Motion for Reinstatement & amended Final Brief for the Appellant by depositing a copy of it in the United States Mail, postage prepaid, on March, 17, 2025 addressed to the attorney of record, Hood Law Firm attorney of record,*

*Ellore A Gains, at her office at*

*172 Meeting Street Charleston SC,*

*29401 on December 21, 2024*

*&Gmail @ [elloree.gains@hoodlaw.com](mailto:elloree.gains@hoodlaw.com)*

*Muhammad Nathaniel Wilson in Town Suites*

**8082 Rivers Ave, Room 309 North Charleston Sac 29406**

**843-468-3432 [creyolab@gmail.com](mailto:creyolab@gmail.com)**