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**Jun 23 2025**

**SC Court of Appeals**

**STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

**Case No.: 2024-001241**

**THE MATTER OF JASON BOYLE, Appellant**

**Appellant's Reply to Respondents' Return — Renewed Demand for Sanctions and  
Extension of Deadlines**

**Introduction**

COMES NOW the Appellant Jason M. Boyle, PhD, acting *pro se*, respectfully submitting this response to the South Carolina Attorney General's return concerning Appellant's motion to extend deadlines for replying to Respondents' motion to dismiss his appeals. This case involves a series of improperly designated contempt orders originating in the Oconee County Probate Court and subsequently upheld and compounded by the Tenth Circuit Court. Contrary to the assertions of the Attorney General's Office, these appeals arise from civil contempt findings, not criminal proceedings, and the Appellant has been systematically denied fundamental constitutional protections due to procedural mischaracterizations and judicial misconduct.

This response will demonstrate that the Attorney General's Office and the involved courts have engaged in procedural gamesmanship designed to obscure the true nature of this case and to shield government officials from accountability. The Appellant's filings and payment of fees clearly demonstrate that these matters have been treated as civil from the outset, and any attempt to reclassify them as criminal—prior to the most recent ruling by the Court of Appeals—is both improper and prejudicial. It is important to note that courts have broad discretion to manage the court docket and consistently maintained civil procedure throughout the initial court hearing in the Oconee Probate Court and throughout the appeal processes in the 10<sup>th</sup> circuit court and in the South Carolina Court of Appeals.

Further, this brief will expose significant violations of due process, including denial of the right to counsel, improper *ex parte* communications between judges, jurisdictional overreach, and deliberate obfuscation regarding case numbers and procedural rules. The Attorney General's motion to dismiss is not only legally unfounded but also morally repugnant, serving only to perpetuate injustice and protect those responsible for it.

Appellant therefore respectfully requests that the Court to either extend the deadlines to allow for a proper reply to the motion to dismiss or, alternatively, reject the motion outright. Appellant further urges the Court to allow these appeals to proceed on their merits and to impose sanctions on the Attorney General's Office for their bad faith conduct. A detailed factual and legal argument follows.

### **History of Dispute Between Civil and Criminal Contempt**

#### **Mischaracterization of Contempt as Criminal: A False Premise**

In the very first sentence of the State's Return to Appellant's Motion to Extend Deadlines and Request for Sanctions, Respondent falsely claims that Appellant was held in "criminal contempt" by the Oconee County Probate Court. This is a blatant misrepresentation. The order issued by the Probate Court clearly states that Appellant was held in *direct contempt*, with no mention whatsoever of criminal charges. Moreover, the order lacks a case number, rendering any purported classification — civil or criminal — procedurally null and void from the outset. As this narrative will make abundantly clear, the Probate Court and Judge Danny Singleton indisputably treated this matter as civil in nature. The Appellant is being relentlessly persecuted because of a personal grudge harbored by Judge Singleton against Appellant's wife, which has driven him to a reckless disregard for the law, judicial procedure, and constitutional rights.

For the South Carolina Attorney General's Office — through Andrew Powell and others — to now seek dismissal of this appeal based on falsehoods and procedural trickery is not merely improper; it is morally bankrupt and utterly despicable. To deny full appellate review of this case on such dishonest grounds would set an appalling precedent that invites and empowers South Carolina judges to weaponize their courts for personal vendettas without fear of accountability or consequence. Such a precedent would erode the fundamental protections guaranteed by the United States Constitution, turning the judiciary into a tool of personal persecution rather than an instrument of justice. The Appellant will not stand idly by while the South Carolina Attorney General's Office attempts to bury the crimes of the state under a pile of procedural deceit. The citizens of South Carolina — and indeed of our nation — deserve better.

#### **Initial Attempts to Engage the Solicitor: Ignored Pleas for Intervention**

On June 10, 2024, Appellant sent an email to Jason Alderman, the lead Solicitor for Oconee County, and David Wagner, the elected Solicitor for the Tenth Judicial Circuit. At that time, Appellant reasonably believed — as any layperson would — that he was facing criminal contempt charges, due to the explicit threat of jail time. This belief preceded Judge Singleton's subsequent determination in court that the case was civil in nature, as

demonstrated both by the procedures employed during the hearing and Judge Singleton's clear statement on the record in open court on June 17, 2024, that the matter was civil. In the June 10 email, Appellant requested that the Solicitor intervene in what was then presumed to be a criminal matter. The Solicitor's Office chose to ignore the request entirely. Then, on or about June 13, 2024, Appellant personally visited the Solicitor's Office and again requested to speak with any available Solicitor regarding this issue. Appellant was informed — in no uncertain terms — that no Solicitor was interested in speaking with him.

Throughout this process, Appellant has paid filing fees both to the Tenth Circuit and to the South Carolina Court of Appeals — fees that would not apply in a criminal appeal proceeding. The Court of Appeals accepted these fees without reimbursement, despite Appellant's requests, because the case was being treated, quite obviously, as civil until very recently, when the Court of Appeals — in an order following a motion for clarification of parties — reclassified the nature of the appeal as criminal.

Appellant was forced to pay for every motion filed in the Tenth Circuit. For example, on September 15, 2024, Appellant sent an email titled "Motion to Clarify Gag Order and Appeal Status." This motion was intended to clarify the status of the pending appeals and to confirm that the orders at issue were, in fact, on appeal before the South Carolina Court of Appeals. In an effort to avoid incurring yet another unnecessary fee, Appellant attempted to submit this motion by email and called the Clerk's Office in an effort to persuade them to accept it without requiring payment. These events clearly demonstrate that, at that time, the case was being treated as a civil matter by all involved.

### **Payment of Filing Fees Demonstrates Civil Nature of the Case**

The so-called "sentencing" on May 29, 2024, occurred not in open court, but in the courthouse lobby — a setting wholly improper for any judicial sentencing, let alone one involving deprivation of liberty. This "sentence" arose from a purported incident that Judge Singleton did not witness firsthand; instead, he relied on unsubstantiated hearsay reports. It remains baffling how Judge Singleton could possibly have believed he had jurisdiction to impose a 10-day jail sentence under such circumstances — without a proper hearing, without evidentiary review, without public proceedings, in the absence of open court and without due process. But if jurisdiction is to be presumed at all, it must be ascribed to the Probate Court alone — not to any criminal court, as no criminal proceeding was ever initiated. Notably, no case number of any kind was assigned to this matter, much less a criminal case number. The civil case number originally used in the summons — relating to the Doyle Pierce Estate — was explicitly discarded by Judge Singleton, who clearly stated

on the record that this matter had “nothing to do with the Doyle Pierce Estate” and was instead based on Appellant’s conduct.

Further, the order which Appellant is accused of violating — though, as the record makes clear, Appellant had no prior knowledge of this order — is not a statute or law at all. It is an *Administrative Order* from the South Carolina Supreme Court. Nowhere in that order is there any provision for criminal prosecution for its alleged violation.

Prior to the July 17, 2024, hearing in Probate Court, Appellant submitted a Motion to Dismiss that included a request for both a special prosecutor and a jury — requests that would have been routine in a criminal contempt proceeding. Both requests were summarily denied because the court was treating the hearing as a civil contempt matter.

While some might argue that the imposition of jail time somehow "converts" the proceeding to criminal, the erratic and lawless behavior of the Probate Court, along with the precedent it had set in other cases, overwhelmingly demonstrates otherwise. The Oconee County Probate Court has an established — and deeply troubling — pattern of imposing jail sentences under the guise of civil contempt proceedings, excluding public defenders and Solicitors’ Offices from such hearings, with defendants sentenced to incarceration under “civil” findings of contempt.

### **Improper Sentencing Outside Open Court and Jurisdictional Questions**

At the June 17, 2024, contempt hearing in Probate Court, Appellant had already secured approval for a public defender. At the very outset of the hearing, however, Judge Singleton declared that Appellant would not be permitted the services of a public defender — because, as the judge plainly stated on the record, this was a *civil* hearing. Additionally, the appointed public defender, John Abdalla, issued a letter expressly stating that he could not represent Appellant because this was a civil matter, not a criminal one.

The court’s conduct that day further underscores that this was no criminal proceeding. When Appellant requested a continuance in order to retain private counsel, Judge Singleton denied the request outright. Instead, Judge Singleton forced Appellant to proceed, *pro se*, without the benefit of counsel, in a hearing that resulted in his immediate incarceration. The denial of the public defender, followed by the refusal to grant time for Appellant to obtain legal representation, was a flagrant violation of basic due process — but it also made abundantly clear that Judge Singleton himself regarded the hearing as civil in nature. Within just 30 minutes of being denied public defense, Appellant — unrepresented, unprepared, and acting under duress — was compelled to defend himself in a hastily-convened hearing that culminated in his incarceration.

## **Administrative Order Lacks Criminal Enforcement Provisions**

To further support the argument that the direct contempt findings of May 29 and June 17 were unequivocally civil in nature, it must be emphasized that the appeal of those findings was docketed in the Tenth Circuit Court as a *civil appeal*. Probate Judge Danny Singleton personally appeared in Circuit Court to defend his ruling — not as a state actor represented by the Solicitor’s Office — but with a privately retained attorney, Jim Logan, acting as counsel. If this had been a criminal proceeding, neither the judge’s private attorney nor the judge himself would have appeared in such a posture.

Indeed, at no point has there been any formal order or declaration converting the civil finding of contempt entered by Judge Singleton into a criminal one. While Judge McIntosh made an offhand statement in open court, suggesting the matter was a “criminal contempt” charge, he did so while addressing Judge Singleton and attorney Jim Logan — all during what was, in fact, a civil appeal hearing. McIntosh’s statement is in direct contradiction to the record, the actions of the court, and Judge Singleton’s own findings. No subsequent order was ever entered to transform or reclassify the original civil contempt findings. The record remains clear: this was — and remained — a civil matter.

## **Denial of Constitutional Protections: Public Defender and Attorney Rights**

On September 16, 2024, Appellant was again held in contempt of court for an alleged violation of a gag order. The order issued that day simply states that Appellant was held in contempt — it makes no mention whatsoever as to whether this was a finding of civil or criminal contempt. Nowhere in the order is the nature of the contempt clarified.

Following this, Judge McIntosh further demonstrated the civil nature of the ongoing proceedings. After blatantly disregarding overwhelming evidence establishing Appellant’s innocence concerning the Probate Court’s contempt finding, Judge McIntosh entered an order on February 7, 2025, formally upholding the original Probate Court’s civil contempt ruling. The original Probate Court order — again, without a case number — found Appellant in *direct contempt of court* in a hearing conducted under civil procedures. The Tenth Circuit Court, in turn, processed the matter as a civil appeal, with Judge Singleton still defended by his privately retained attorney.

During the January 31, 2025, hearing before Judge McIntosh, Appellant directly argued that his rights had been violated: he had been denied a public defender and denied the opportunity to secure private counsel, which would constitute a fatal defect in any criminal proceeding. Yet Judge McIntosh explicitly ruled that Appellant was *not entitled to an attorney* — thereby reinforcing the Tenth Circuit Court’s standing that this was, in fact, a civil contempt proceeding, and that the appeal was proceeding under civil law.

## **Civil Proceedings Despite Jail Sentence: Judicial Contradictions**

To add further insult to injury, there is significant and troubling evidence that multiple *ex parte* communications occurred between Judge Singleton and Judge McIntosh during the pendency of these proceedings. The clarity of this evidence is beyond dispute. For instance, in an email dated August 8, 2024—sent by Appellant to Jim Logan and copied to Judge McIntosh’s clerk—Appellant demanded full transparency and posed several discovery questions seeking details about the *ex parte* communications between Judge Singleton, Judge McIntosh, and attorney Logan. It is clear from this correspondence that such *ex parte* communications did occur. Judge Singleton and his co-conspirators transmitted so-called “evidence” alleging that Appellant had violated a release order, all behind Appellant’s back, without his knowledge or opportunity to respond, despite Appellant proceeding *pro se*.

Additionally, prior to this email correspondence, materials that were produced reveal that Maggie Bonadies, Clerk of Court for Judge Singleton — who also served as a witness in the Probate Court’s civil contempt hearing — conducted her own unauthorized online “investigation” of Appellant. She then communicated her findings directly to Judge Singleton in an *ex parte* manner. Bonadies was and is a subordinate of Judge Singleton and acted as a witness in the contempt hearing held in the Oconee Probate court on June 17. None of Appellant’s discovery requests made in the August 8, 2024, email were ever addressed by the court or answered by Logan — another glaring violation of due process. The record is littered with evidence of widespread *ex parte* contact, raising serious questions about improper judicial coordination between the Probate and Circuit Courts.

It is entirely unclear whether these judges actively conspired to exploit the ambiguity between “civil” and “criminal” contempt in order to obstruct Appellant’s constitutional rights. However, the situation is crystal clear in one particular instance: McIntosh’s clerk sent an email dated July 22, 2024, directing attorney Logan to draft a Rule to Show Cause motion — relying on “evidence” that had been submitted by Judge Singleton through *ex parte* channels.

There are additional incidents—though lacking direct documentary evidence—that strongly suggest *ex parte* communications were taking place. For example, following the hearing on or about September 12, 2024, attorney Jim Logan requested an off-the-record meeting with Judge McIntosh. Judge McIntosh publicly consented, stating the discussion would concern a “separate matter.” Given the prior disregard both judges had exhibited toward legal standards—especially regarding *ex parte* communications—it strains credibility to believe this meeting did not involve Appellant’s case or the court’s ongoing,

self-created confusion over managing the civil contempt finding under appeal in the Circuit Court.

Similarly, after the January 31, 2025, hearing in the Circuit Court, attorney Jim Logan remained in the courthouse for more than thirty minutes after most individuals had departed. He was observed leaving the courthouse visibly red-faced and angry. Appellant reasonably believes that Mr. Logan held a private meeting with Judge McIntosh to discuss the forthcoming order issued on February 7.

### **Ex Parte Communications and Judicial Misconduct Undermine Fairness**

The South Carolina Court of Appeals has now merged all of Appellant's appeals into one consolidated case. The first appeal concerns the Tenth Circuit Court's so-called "release order," which imposed unconstitutional restrictions on Appellant's rights — including a gag order and other probation-like terms, all without legal authority. This appeal is plainly civil in nature, based on the unlawful infringement of Appellant's substantial rights. The fact that this civil appeal was merged with the others demonstrates that, at the time of the merger, *all* pending appeals were being treated as civil cases.

The second appeal concerns Judge McIntosh's finding of contempt for the alleged violation of the release order. The order in question is entirely silent as to whether it constitutes a finding of civil or criminal contempt. Nor does it impose any punishment from which such a determination could be inferred. The State now argues — self-servingly — that this is not a "final order" because Judge McIntosh so declared. But the order is final in every relevant respect: it finds Appellant guilty of violating a court order. The delay in issuing punishment is nothing more than an obvious effort to hold the threat of incarceration over Appellant's head in an attempt to coerce him into abandoning his First Amendment rights in his pursuit of justice. This manipulation — using judicial threats as leverage — is both unethical and unconstitutional.

This contempt finding was intended to compel the Appellant to change his behavior, as evidenced by the deliberate delay in sentencing. Under well-established law, only civil contempt may be used to compel a party to act or refrain from acting. In contrast, criminal contempt is imposed solely to punish past conduct and cannot be used to force future compliance. The fact that this contempt finding was clearly structured to compel the Appellant to act — rather than to punish — unambiguously designates it as a civil contempt proceeding.

The third order under appeal is the Tenth Circuit Court's order affirming the original Probate Court's civil contempt finding — the finding that led to Appellant's unlawful incarceration. The Probate Court's orders, which lacked even a case number, found Appellant in direct

contempt of court during a proceeding conducted under civil procedures. Worse still, the Probate Court has now set a dangerous precedent: that a person can be held in civil contempt and jailed for violating an Administrative Order of the South Carolina Supreme Court — even where the individual had no prior knowledge of the order in question.

This new precedent further holds that civil contempt can be used as a weapon to strip citizens of their constitutional protections and imprison them — without the rights and safeguards required in any legitimate criminal proceeding. It seems that the Probate Court views this as somehow analogous to incarceration for nonpayment of child support in family court — where imprisonment can occur under civil contempt. But unlike those cases, Appellant had no ongoing case in the Probate Court when he was found in contempt. While the initial Rule to Show Cause improperly used the case number from the Doyle Pierce Estate, Judge Singleton expressly stated on the record during the June 17, 2024, hearing that this case had nothing to do with the Doyle Pierce Estate matter and was instead solely intended to address the behavior of the Appellant.

### **Case Number Confusion and the Court’s Failure to Clarify Procedural Status**

On September 24, 2024, in an email to Judge McIntosh’s law clerk, Appellant formally sought clarification from the Court regarding the September 12, 2024, hearing and Judge McIntosh’s offhand comment suggesting that the original Probate Court contempt order was somehow “criminal” in nature. In writing, Appellant specifically requested that the court clarify whether this matter was now to be treated as a criminal case governed by criminal statutes — in light of the glaring contradictions between Judge McIntosh’s comments and the actual procedural record, which had been consistently civil up to that point. McIntosh responded evasively, claiming he could not provide legal advice — despite the fact that Appellant was not seeking legal advice, but merely asking the court to clarify its own conflicting statements on a fundamental procedural question.

During the same September 12, 2024, hearing, Judge McIntosh took the extraordinary step of assigning the Tenth Circuit civil appeal case number to the underlying Probate Court contempt matter — a Probate Court matter that had *no case number of its own*. From the bench, in open court, McIntosh declared that since the original Probate Court order imposing civil contempt had no case number, he would simply assign it the Tenth Circuit’s civil appeal number. This was an outrageous abuse of judicial authority — an unprecedented act that calls into question the integrity of every subsequent statement or ruling by Judge McIntosh. No court should be permitted to simply fabricate procedural legitimacy after the fact by “assigning” new case numbers to old contempt orders.

The September 24, 2024 email from Appellant simply sought clarification of these procedural contradictions — but the court refused to provide any, leaving in place an indefensible cloud of uncertainty as to the very nature of these proceedings. To this day, the Oconee County Probate Court itself has not adopted the Tenth Circuit civil appeal case number into its records — making clear that even the Probate Court regards Judge McIntosh’s bizarre comments from the bench as null and void.

### **Ignored Requests for Official Designation of Civil or Criminal Status**

Additionally, on September 18, 2024, Appellant, acting *pro se*, submitted a formal written request to the Circuit Court, asking the court to issue an *official order* clarifying whether the Probate Court’s contempt finding — a finding issued in a hearing conducted under civil procedures and explicitly labeled as civil contempt by Judge Singleton in open court — was now being considered criminal in nature. The court ignored this request entirely.

Appellant did not file this as a formal motion because doing so would have required the payment of additional filing fees — which the Clerk of Court continued to collect, treating the case as a civil appeal matter. Had the court provided an order declaring the case “criminal,” no such fees would have been due for Appellant’s filings, and Appellant would have been entitled to full constitutional protections as a criminal defendant. In that event, Appellant would have filed a proper motion, requested a hearing, and demanded a ruling determining *when* and *how* this matter allegedly became a criminal case — if, indeed, it is to be considered criminal at all. The court’s refusal to address this issue further underscores the procedural gamesmanship that has permeated this case from the start.

### **Procedural Ambiguity: Appeals Rules and Unanswered Clarifications**

One of the orders issued on September 16, 2024, declared that the rules governing appeals from the Probate Court — specifically South Carolina Code § 62-1-308 — *do not apply* to this case because it is an appeal of a Probate Court order, not a direct appeal from the Probate Court itself. This ruling explicitly stated that Rule 62-1-308 was inapplicable.

In response, on September 18, 2024, Appellant sent a written request seeking clarification from the court regarding which set of procedural rules would govern this appeal if Rule 62-1-308 did not apply. The Circuit Court never responded. This silence is telling: the entire case had, to that point, been conducted under the civil procedure rules set forth in Rule 62-1-308. There are no other appropriate civil procedures that could govern this appeal.

Judge McIntosh’s refusal to clarify which rules applied exposes the court’s uncertainty and unwillingness to follow proper legal procedure. Moreover, attorney Jim Logan — private counsel for Judge Singleton — along with Judge Singleton and Judge McIntosh themselves, all understood that this matter was being treated as a civil appeal. They knew the

distinction between civil and criminal procedure and yet persisted in operating under civil procedural rules.

Further evidence of this is the continued imposition of filing fees for motions and other filings — fees that would not be required if this were a criminal appeal. Judge Singleton himself appeared on January 31, 2025, to defend his ruling before the Circuit Court, represented by his private attorney. These facts confirm that the case was regarded and conducted as a civil matter well beyond the point when it should have been designated criminal, if the charges were legitimate.

### **Dangerous Precedent: Concealing Criminal Proceedings Under Civil Procedure**

Until the recent order from the South Carolina Court of Appeals clarifying the parties, this case was unmistakably treated as a civil matter. The initial designation as a civil case was deliberate, designed to deny Appellant the constitutional protections owed in any criminal prosecution. The true criminal nature of this case has been obscured by those involved — the Probate Court judges, the Tenth Circuit Court, Judge Singleton, Judge McIntosh, the 10<sup>th</sup> circuit solicitor, attorney Jim Logan, and the South Carolina Attorney General's Office — all conspiring to maintain a façade of civil procedure in order to suppress Appellant's rights.

If the Court of Appeals accepts the Attorney General's motion to dismiss on procedural grounds, it will establish a dangerous precedent: that criminal prosecutions can be conducted under civil procedure, thereby depriving defendants of constitutionally guaranteed rights. This loophole will sanction a gross miscarriage of justice and permit judges to persecute citizens without due process.

It is imperative that the Court rejects this motion. Allowing dismissal based on the Attorney General's procedural gamesmanship would invite a flood of similar abuses and set back the cause of justice in South Carolina. Such a ruling would inevitably require immediate review by the Supreme Court of South Carolina.

The merits of this case are clear: Appellant has been relentlessly persecuted by both the Oconee County Probate Court and the Tenth Circuit Court, with blatant disregard for the United States Constitution, court procedures, established precedents, statutes, local laws, and fundamental principles of justice. Instead of intervening to restore integrity, the Attorney General's Office has chosen to aid and abet this abuse by seeking dismissal on procedural ground argument based in falsehoods — effectively protecting corrupt judges and burying the truth.

The conduct of the Attorney General's Office is reprehensible and demonstrates clear bad faith toward the tribunal, warranting sanctions. Appellant has incurred significant financial burden in defending himself not only against the misconduct of these criminal judges, but

also against the reprehensible attorneys representing the Attorney General's Office. The deliberate misdesignation of this case as civil was a calculated tactic designed to strip Appellant of his constitutional protections. The egregious and unethical behavior of the Attorney General's Office is sanctionable and cannot be allowed to stand unaddressed.

Moreover, Appellant has suffered reputational harm and has been forced to abandon prior commitments — including volunteer work crucial to ongoing education reform efforts in Uganda — all due to this unjust legal battle.

### **Attorney General's Office's Procedural Gamesmanship and Obstruction**

In a final, troubling development, as detailed in an open letter to the Court of Appeals sent via email on June 18, 2025, the Attorney General's Office resorted to underhanded tactics to oppose Appellant's motion for sanctions against them. After Appellant notified the court that he was out of the county with limited internet access, the AG's office deliberately filed their return via hard copy, thereby circumventing electronic notification protocols and ensuring that Appellant would not receive timely notice of their filing.

It was only through Appellant's own diligence, coupled with the conscientious efforts of the case manager, that he became aware of this filing and was able to prepare this late, but hopefully timely, response. Given these deliberate efforts to obstruct Appellant's right to timely notice and participation, the Court should accept this filing as timely and impose appropriate sanctions on the Attorney General's Office.

This pattern of misconduct is consistent with the AG's office's broader strategy: to use procedural chicanery to bury the truth, shield judicial misconduct, and prevent the Court from addressing the substantive merits of this case.

### **Request for Additional Time and Evidence to Fully Respond**

This filing does not yet include all the evidence, case law and statutes necessary to fully respond to the Attorney General's motion to dismiss. Acting *pro se*, Appellant has devoted the maximum time possible to preparing this detailed reply (2 long days). To complete a comprehensive response, Appellant requires additional time to gather and organize extensive evidence, including:

- Emails between Appellant and the Probate Court, the Tenth Circuit Court, the Tenth Circuit Solicitor's Office, and the Tenth Circuit Public Defender's Office;
- Numerous court orders and documents reflecting the ongoing case number confusion and ambiguity in case designation;
- Multiple references to transcripts from the Probate and Tenth Circuit Courts;

- Motions filed in the South Carolina Court of Appeals; and
- Thorough research of case law and relevant statutes.

Appellant will keep a precise record of hours spent and damages sustained — including harm to his reputation and lost opportunities to fulfill volunteer commitments — in the hope that the Court of Appeals will hold these judicial and prosecutorial actors accountable through aggressive sanctions for their flagrant abuses.

The Attorney General's Office and the involved judges have repeatedly demonstrated disregard for constitutional rights, court procedure, and the rule of law. Their actions have inflicted severe hardship on Appellant and his family. It is incumbent on this Court to reject the motion to dismiss, allow the appeal to proceed on its merits, and impose sanctions where appropriate to deter such misconduct.

### **Conclusion**

For the foregoing reasons, Appellant Jason M. Boyle, PhD, respectfully requests that this Court deny the South Carolina Attorney General's motion to dismiss, and if not, extend deadlines so that the Appellant can file a proper response. The procedural assertions raised by the Respondents are without merit and serve only to obscure the significant constitutional violations and judicial misconduct that have plagued this case from its inception.

Appellant has been subjected to relentless persecution under the guise of civil proceedings that in reality impose criminal penalties without the protections mandated by law. The Court must reject any attempt to shield such abuses behind improperly implemented procedural technicalities.

Furthermore, Appellant urges this Court to impose appropriate sanctions against the Attorney General's Office for their bad faith litigation tactics designed to obstruct justice and evade accountability. Justice demands that these appeals proceed on their merits so that the truth may be fully examined and constitutional rights restored.

Appellant prays for all other relief this Court deems just and proper.

### **Prayer for Relief**

WHEREFORE, Appellant Jason M. Boyle, PhD, respectfully prays that this Court:

1. Deny the South Carolina Attorney General's motion to dismiss in its entirety and if not, a 60 day extension of deadlines is granted;

2. Award Appellant \$1,500 in compensation for the time and effort spent preparing this detailed response to address the Respondents' bad faith and candor toward the tribunal;
3. Award Appellant \$5,000 in damages for harm to his reputation and loss of previous commitments, as he was forced to neglect critical personal and professional obligations in order to find sufficient time to respond to these baseless filings;
4. Impose sanctions on the South Carolina Attorney General's Office and all other parties responsible for the malicious and obstructive conduct throughout these proceedings;
5. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Respectfully Submitted, this June 21, 2025.



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Jun 23 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Case No.: 2024-001241

THE MATTER OF JASON BOYLE, Appellant

**Appellant's Reply to Respondents' Return — Renewed Demand for Sanctions and  
Extension of Deadlines**

**PROOF OF SERVICE**

I hereby certify that a copy of this reply was delivered to the following parties:

1. Jim Logan: logan@loganandjolly.com
2. Oconee County Detention Center: jchapman@oconeelaw.com
3. Oconee County Sheriff's Department: mcrenshaw@oconeelaw.com
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Respectfully Submitted, this June 21, 2025.



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