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Aug 14 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Richland County
Court of Common Pleas

The Honorable Thomas William McGee, III, Circuit Court Judge

Case No. 2025-000532

Federico Castro.....Appellant,

v.

South Carolina Department of Motor Vehicles Driver
Records Manager.....Respondent.

**RESPONDENT SOUTH CAROLINA DEPARTMENT
OF MOTOR VEHICLES' RETURN TO APPELLANT FEDERICO CASTRO'S
MOTION TO REINSTATE**

I. BACKGROUND

Appellant first filed suit on this issue against the South Carolina Department of Motor Vehicles (hereinafter "SCDMV") on June 11, 2019, alleging exclusively and entirely that "Your records on 2/14/2015 are wrong and requested correction. Never existed." *See* First Complaint 2019-CP-40-03207 (attached as Exhibit "A"). The First Complaint was dismissed by Circuit Court Judge L. Casey Manning on October 9, 2019, without prejudice. *See* Order 2019-CP-40-03207 (attached as Exhibit "B"). The Appellant never appealed the Order in case 2019-CP-40-03207. Rather, the Appellant filed another suit against SCDMV in Circuit Court on August 29, 2024. *See* Second Complaint 24-CP-40-05272 (attached as Exhibit "C"). This time, Appellant

cut and pasted the notice of suspension and steps needed to be taken for reinstatement of his driver's license concerning the 2015 suspension of his driver's license he had previously complained about. See 24-CP-40-05272 Exhibit "C." A Form 4 was issued on January 7, 2025, but the actual Order dismissing the second Complaint with prejudice by Circuit Judge T.W. McGee, III was not entered until May 30, 2025. See Exhibit "D" Order. Appellant apparently filed a Notice of Appeal with the Circuit Court in 24-CP-40-05272 on April 9, 2025. See Exhibit "E" Notice of Appeal.

II. ARGUMENT

Appellant's First Complaint was dismissed "due to Plaintiff's failure to state facts sufficient to constitute a cause of action and due to failure to properly serve the Summons and Complaint on the Defendant." See Exhibit "B." Appellant's Second Complaint was "dismissed with prejudice due to: 1) failure to state facts sufficient to constitute a cause of action; 2) res judicata; and 3) failing to file a claim within the statute of limitations." See Exhibit "D."

Appellant lists three issues on appeal: 1) whether the Circuit Court erred by "ending the case without an Order," 2) whether the Circuit Court violates the Appellant's right to a legal remedy, and 3) whether the Circuit Court "make an err [sic] in not considering that this action is prescribed by res judicata against the Respondents."

Appellant's case has now been dismissed by Circuit Court Judge L. Casey Manning on October 9, 2019, and by Circuit Judge T.W. McGee, III on May 30, 2025. See Exhibit "B"; Exhibit "D." Despite Appellant's allegation, this case has been dismissed by two Orders.

The Appellant makes a vague argument that the Circuit Court violated his right to a legal remedy. Contrary to this claim, the first Court dismissed the action without prejudice and for sound legal reasons, including Appellant's obvious failure to state a claim and improper service.

The second Court dismissed the matter with prejudice for failure to state a claim, res judicata in that the Appellant failed to appeal the Order in the first case, and because the statute of limitations had clearly expired. S.C. Code Ann. § 15-78-110 (2005).

The Appellant finally argues the doctrine of res judicata, but the doctrine actually prohibits his case from being considered. The issue of Appellant's suspension was adjudicated in Circuit Court twice, where both cases resulted in Orders of Dismissal, and where the same parties were present. *Judy v. Judy*, 393 S.C. 160, 167, 712 S.E.2d 408, 412 (2011).

SCDMV has no record of any service by Appellant of his Notice of Appeal other than an electronic notices of filing from the Circuit Court in the case 24-CP-40-05272. The emails from the Court did not specify that Appellant had filed an appeal. SCDMV has no record of any certified mail sent from Appellant notifying it of the appeal. Therefore, Respondent failed to provide proof of timely service upon SCDMV as required by Rule 203(b)(1), SCACR. We respectfully request that this court deny Appellant's Motion to Reinstate.

s/Thomas H. Eller, III
THOMAS H. ELLER, III, SC Bar # 75802
Deputy General Counsel
Rachel Buzhardt, SC Bar #105725
Assistant General Counsel
South Carolina Department of Motor Vehicles
P. O. Box 1498
Blythewood, South Carolina 29016
(803) 896-9900
Attorneys for Respondents

August 14, 2025
Blythewood, South Carolina

RESPONDENT SOUTH CAROLINA
DEPARTMENT OF MOTOR VEHICLES

EXHIBIT A

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Federico Castro

Plaintiff(s)

vs.

D.M.V. SOUTH CAROLINA

Defendant(s)

Submitted By: Federico Castro

Address: 2102 Blacker Blvd
Buffton, SC 29909

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

-CP-

2019CP400 3207

SC Bar #:

Telephone #:

Fax #:

Other:

E-mail:

RICHLAND COUNTY
FILED
2019 JUN 11 PM 3:56
JEANETTE M. MCBRIDE
C.C.P. & F.C.

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

DOCKETING INFORMATION (Check all that apply)

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

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

NATURE OF ACTION (Check One Box Below)

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

Submitting Party Signature:

Date:

06/11/2019

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCF, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND)

Federico Castro)
2102 Blacker Blvd, Bluffton SC 29909)

PLAINTIFF(S))

VS.)

DMV SOUTH CAROLINA)
PO Box 1498 Blythewood, SC 29016)

DEFENDANT(S))

CIVIL CASE NUMBER

IN THE COURT OF COMMON PLEAS

SUMMONS

2019 JUN 11 AM 9:12
JEANNETTE W. MCBRIDE
C.C.P. & G.S.
RICHLAND COUNTY
FILED

TO THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the subscribers at 2101 Blacker Blvd. Bluffton SC 29910, within thirty (30) days after the service hereof, exclusive of the date of such service, and IF YOU FAIL TO ANSWER THE COMPLAINT WITHIN THE TIME AFORESAID, THE PLAINTIFF WILL APPLY TO THE COURT FOR THE RELIEF DEMANDED IN THE COMPLAINT.

Dated: June, 11 2019



Federico Castro

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND)

Federico Castro)
2102 Blacker Blvd, Bluffton SC 29909)

PLAINTIFF(S))

VS.)

DMV SOUTH CAROLINA)
PO Box 1498 Blythewood, SC 29016)

DEFENDANT(S))

CIVIL CASE NUMBER

IN THE COURT OF COMMON PLEAS

COMPLAINT

2019 JUN 11 AM 9:14
JEANETTE W. MCBRIDE
C.C.P. & G.S.
RICHLAND COUNTY
FILED

The Plaintiff complaining of the Defendant above named would respectfully show unto this Honorable Court:

Your records on 02/14/2015 are wrong and requested correction. Never existed.

Dated: June, 11 2019



Federico Castro

RESPONDENT SOUTH CAROLINA
DEPARTMENT OF MOTOR VEHICLES

EXHIBIT B

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Federico Castro

Plaintiff,

v.

South Carolina Department of Motor Vehicles,

Defendant.

IN THE COURT OF COMMON PLEAS

Civil Action No. 19-CP-40-03207

**ORDER OF DISMISSAL
WITHOUT PREJUDICE**

On October 8, 2019, Plaintiff and Defendant, though Assistant General Counsel Brandy A. Duncan, appeared for a motion hearing regarding Defendant's motion to dismiss. Defendant's motion to dismiss was based on violations of Rules 12(b)(5) and (6), SCRCP. After hearing from the parties at the motion hearing and reviewing the pleadings in this matter, I find as follows:

The entirety of Plaintiff's Complaint states "Your records on 02/14/2015 are wrong and requested correction. Never existed." Plaintiff's allegations do not specify which records he alleges are incorrect. Nor do Plaintiff's allegations specify which type of records maintained by the Defendant that the Plaintiff is referring to as being "wrong." Defendant states that it ran a query to determine how many transactions occurred on February 14, 2015 within the South Carolina Department of Motor Vehicles and that query indicated that nearly 6,000 transactions took place on that date. Defendant is not required to search all of these transactions to determine which one is complained of by Plaintiff. Rather, it is the Plaintiff's responsibility, as the one bringing this action, to state his complaint with sufficient specificity and detail to inform the Defendant and Court what the Plaintiff's action regards and what relief is sought.

Under Rule 12(b)(6), SCRCP, a complaint may be dismissed due to a failure to state facts sufficient to constitute a cause of action. In considering such a motion, the trial court must base its

ruling solely on the allegations set forth in the complaint. If the facts and inferences drawn from the facts alleged in the complaint, viewed in the light most favorable to the plaintiff, would entitle the plaintiff to relief on any theory, then the grant of a motion to dismiss for failure to state a claim is improper. *Bergstrom v. Palmetto Health Alliance*, 358 S. C. 388, 596 S. E. 2d 42, *reh. den.* (2004); *Baird v. Charleston County*, 333 S.C. 519, 511 S.E.2d 69 (1999).

In this case, because Plaintiff has failed to provide sufficient information to inform the Defendant and this Court as to which records Plaintiff asserts are incorrect, which records Plaintiff asserts need correction, and what relief Plaintiff is seeking, I have little option but to dismiss this action for failure to state facts sufficient to constitute a cause of action.¹

Additionally, Plaintiff failed to properly serve his Summons and Complaint on SCDMV. Rule 4(d)(5), SCRCP requires a copy of the Summons and Complaint in any action filed against a State Agency to be delivered to the Agency and to be sent to the South Carolina Attorney General by registered or certified mail. In this case, Plaintiff mailed to SCDMV, via the U.S. Postal Service Priority 2-Day Mail, a copy of the Summons and Complaint. The SCDMV Office of General Counsel received that mailing on June 14, 2019. Plaintiff confirms this via his Affidavit of Service filed on June 24, 2019, his Certificate of Service filed on June 24, 2019, his Certificate of Mailing filed June 24, 2019, and his filing titled "September 2010 and Previous Filing Images filed on July

¹ I note that during the motion hearing I did make several inquiries in an attempt to ascertain the action that had been taken by the Defendant to cause the Plaintiff to file this action. Plaintiff claimed that Defendant had previously licensed him, did not provide him with any written notification regarding any adverse action against his driver's license, and now refused to renew Plaintiff's driver's license. Plaintiff was unable to articulate any reason for why Defendant refused to renew Plaintiff's driver's license. Plaintiff did state that he could provide Ms. Duncan with his driver's license number so that she could look into Plaintiff's situation and attempt to determine what had occurred, attempt to resolve the issue, and/or provide Plaintiff with the information needed so that he could resolve the issue. Ms. Duncan agreed to provide such assistance to Plaintiff.

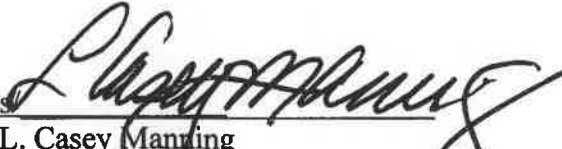
2, 2019. Under Rule 4(d)(5), SCRCP, mailing of a Summons and Complaint, even with tracking, does not constitute proper service against a State Agency. Rather, service must be made by hand delivery as set forth in Rule 4(c), SCRCP.

On June 24, 2019, Plaintiff also hand delivered a copy of the Summons and Complaint to SCDMV's Headquarters located at 10311 Wilson Boulevard, Blythewood, South Carolina 29016. Under Rule 4(c), SCRCP, however, a party to the action cannot be the person to deliver the Summons and Complaint. Since Plaintiff is the one that effected this hand delivery, the June 24, 2019 hand delivery also does not constitute proper service of this Summons and Complaint under Rule 4(c), SCRCP.

Thus, Plaintiff also failed to effect proper service of his Summons and Complaint on the SCDMV.

IT IS, THEREFORE, ORDER, ADJUDGED, AND DECREED, that this action is dismissed without prejudice due to Plaintiff's failure to state facts sufficient to constitute a cause of action and due to failure to properly serve the Summons and Complaint on the Defendant.

IT IS SO ORDERED.


L. Casey Manning
Circuit Court Judge
10-9-19

RESPONDENT SOUTH CAROLINA
DEPARTMENT OF MOTOR VEHICLES

EXHIBIT C

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

Federico Castro
Plaintiff(s)

vs.

S.E.D. of H.V., DRIVER RECORD
MANAGER Defendant(s)

Submitted By:
Address: 2102 Blocker Blvd.
Bluffton, SC, 29909

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

2024CP400 5272

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

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

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- | | | | |
|---|--|---|--|
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|---|--|---|--|

RICHLAND COUNTY FILED

JEANEFF W. McNEEL, C.C.R. S.S., & R. P. S.

2024 AUG 29 AM 9:30

Submitting Party Signature: _____

Federico

Date: 08/29/2024

STATE OF SOUTH CAROLINA)

COUNTY OF RICHLAND)

Federico Castro)

Plaintiff(s))

Vs.)

S.C.D.M.V Driver Records Manager)

Defendant(s))

IN THE COURT OF COMMON PLEAS

Civil Action No.: **2024CP4005272**

COMPLAINT

RICHLAND COUNTY
FILED
2024 AUG 29 AM 9:03
JEANNETTE W. McBRIDE
C.C.P., G.S., & F.C.

Ms. Brandy A. Duncan, S.C Bar# 72052 Assistant General Counsel, South Carolina Department of Motor Vehicles, Post Office Box 1498, Blythewood, South Carolina 29016-0020 Telephone: 803.896.9900 Email: hearingsprocessingunit@scdmv.net on Tue, Oct 8, 2019 4:12 P.M via Email <Brandy.Duncan@scdmv.net> to Federico Castro <gchome19@gmail.com> Pursuant to the Order signed by the Circuit Court Judge L. Casey Manning dated October 9, 2019 under Civil Action No. 2019CP4003207 states the following:

CHRONOLOGY DRIVER RECORDS MANAGER

According to SCDMV's records you were convicted of all of these offenses, except for Driving Under the Influence on February 14, 2015. According to SCDMV's records you were convicted of Driving Under the Influence on July 31, 2018. Shortly after your conviction for the first 6 convictions listed above, the New Jersey Motor Vehicle Commission reported to SCDMV that a Court Order had been issued to suspend your driver's license and driving privileges in New Jersey and South Carolina due to pay the fines associated with those 6 convictions.

COMPLAINING INTO EFFECT: ["ALL OF THESE OFFENSES "EXCEPT" FOR DRIVING UNDER THE INFLUENCE ON FEBRUARY 14, 2015"]

'[1]'(fats)-Misrepresentation of facts that do not exist: Having been convicted of all of these offenses including Driving Under the Influence on February 14, 2015 the concept of "except" it's totally IMPOSSIBLE TO APPLY. When making the following reference, "We posted this conviction to your driving record on March 11, 2015"; Procedure for the execution of conviction and suspension from March 26, 2015 through September 26, 2015.

SCDMV, according to its official notice, (03/11/2015), it is executed in the following manner: VIOL DATE: 02/14/2015 CONV DATE: 02/14/2015 TICKET# 126031 BEGINNING DATE: 12:01 AM 03/26/2015 ENDING DATE: Midnight 09/26/2015

Quote (chronology driver records manager)

“(Later SCDMV was again notified of this conviction and learned that you were not actually convicted of this offense until July 31, 2018. Since you have already served the entire suspension period for this conviction from March 26, 2015 through September 26, 2015, SCDMV did not delete the prior entry (which shows an incorrect date of conviction and, therefore, suspension dates which are a legal impossibility, i.e. you cannot serve your suspension for driving under influence prior to being convicted of that offense!)”

‘[2]’ (facts)-Misrepresentation, suppression, omission of events and transposition of dates.

Quote (chronology driver records manager)

“Next, on February 20, 2019 SCDMV received a compliance Order from New Jersey. This Order essentially stated you had paid the tickets associated with your other 6 convictions in New Jersey. This Order is attached as “Compliance for FTPTT from New Jersey.”

CHRONOLOGY DRIVER RECORDS MANAGER

A copy of the report from the New Jersey Motor Vehicle Commission to SCDMV is attached as “Failure to Pay Traffic Ticket Order from New Jersey”. SCDMV received those reports from New Jersey on various dates (February 27, 2015, March 2, 2015 and March 4, 2015) and posted them to your driving record on the same date received. Posting these violations/suspension on your driving record triggered letters notifying you about the suspensions and the steps that would be needed to clear the suspension. These letters are attached as “Suspension letter for FTPTTs from New Jersey” These letters were also mailed to you (/////), on the next business day after the date showing on the top of each letter.

COMPLAINING INTO EFFECT: [“A copy of the report from NJMVC TO SCDMV”], [“Order from New Jersey”], [“SCDMV received those reports from NJ on various date (February 27, 2015, March 2, 2015 and March 4, 2015)”], [“Suspension letter for FTPTTs from New Jersey”]

Manipulation of information and creating a scenario that does not exist:

First, Not existential and tangible proof of the alleged report that indicates in its content the Order sent by the New Jersey Court, where it strictly refers to “Failure to Pay Traffic Ticket”.

Second, Not existential and tangible copy of the reports sent to SCDMV, from New Jersey Motor Vehicle Commission dated February 27, 2015= March 2, 2015 and March 4, 2015, these reports must exclusively refer to “Failure to Pay Traffic Ticket” on these days.

Third, Not existential and tangible proof of the letters from New Jersey reflecting these violations/suspension as “Suspension letter for FTPTTs from New Jersey”.

These inconsistencies demonstrate a montage of events and a transposition of the date, thus creating a predetermined confusion. Therefore it is legally impossible to enforce a suspension/violation without it existing.

SCDMV, according to its official notice, (02/27/2015), (03/02/2015), (03/04/2015) it is executed in the following manner:

02/27/2015- VIOL DATE: 02/14/2015 - TICKET#126033 - BEGINNING DATE: 03/19/2015

02/27/2015- VIOL DATE: 02/14/2015 - TICKET#126035 - BEGINNING DATE: 03/19/2015

02/27/2015- VIOL DATE: 02/14/2015 - TICKET#126037 - BEGINNING DATE: 03/19/2015

03/02/2015- VIOL DATE: 02/14/2015 - TICKET#126036 - BEGINNING DATE: 03/22/2015

03/04/2015- VIOL DATE: 02/14/2015 - TICKET#126032 - BEGINNING DATE: 03/24/2015

03/04/2015- VIOL DATE: 02/24/2015 - TICKET#126034 - BEGINNING DATE: 03/24/2015

CHRONOLOGY DRIVER RECORDS MANAGER

On February 24, 2015 was notified that you were convicted of the Driving Under the Influence offense. We posted this conviction to your driving record on March 11, 2015 and sent you a letter notifying you of your suspension for Driving Under the Influence and the steps you would have to take to clear that suspension. The notification of the conviction and the suspension letter for the Driving Under the Influence offense are attached as "DUI Conviction in New Jersey & Suspension letter are same". Later SCDMV was again notified of this conviction and learned that you were not actually convicted of this offense until July 31, 2018. Since you have already served the entire suspension period for this conviction from March 26, 2015 through September 26, 2015, SCDMV did not delete the prior entry (which shows an incorrect date of conviction and, therefore, suspension dates which are a legal impossibility, i.e. you cannot serve your suspension for driving under influence prior to being convicted of that offense). Next, on February 20, 2019 SCDMV received a compliance Order from New Jersey. This Order essentially stated you had paid the tickets associated with your other 6 convictions in New Jersey. This Order is attached as "Compliance for FTTT from New Jersey

COMPLAINING INTO EFFECT: ["On February 24, 2015 was notified that you were convicted of the Driving Under the Influence Offense"]

'[3]'(IMPO)-It is legally impossible for (S.C.D.of M.V),(D.R.M); send a notice of Conviction on February 24, 2015, which has never happened (how does it state above). Furthermore it is legally impossible to commit a traffic violation, be convicted and send the notice all at the same time.

REASON: You have been convicted of the offense listed below

SECTION OF LAW: 56-5-2930

VIOL DATE: 02/14/2015 - CONV DATE: 02/14/2015 TICKET# 126031

BEGINNING DATE: 12:01 AM 03/26/2015 ENDING DATE: Midnight 09/26/2015

Therefore, all of the above mentioned never took place, failing which it is impossible to comply with any requirement arising from this.

COMPLAINING INTO EFFECT: ["We posted this conviction to your driving record on March 11, 2015 and sent you a letter notifying you of your suspension for Driving Under the Influence"]

'[4]' (IMPO)-(S.C.D. of M.V), (D.R.M); Posted and Sent a LETTER notifying (D.U.I), on March 11, 2015 and proceeding with the suspension from March 26, 2015 through September 26, 2015. SECTION OF LAW: 56-5-2930 wrongly applied.

REASON: You have been convicted of the offense listed below

SECTION OF LAW: ~~56-5-2930~~

VIOL DATE: 02/14/2015 - CONV DATE: 02/14/2015 - TICKET# 126031

BEGINNING DATE: 12:01 AM 03/26/2015 ENDING DATE: Midnight 09/26/2015

Thus, it is totally impossible from a legal standpoint to suspend or execute it because this fact never existed.

SCDMV, according to its official notice, (03/11/2015), it is executed in the following manner:

03/11/2015- VIOL DATE: 02/14/2015 - CONV DATE: 02/14/2015- TICKET# 126031

BEGINNING DATE: 12:01 AM 03/26/2015 ENDING DATE: Midnight 09/26/2015

Quote (chronology driver records manager)

Later SCDMV was again notified of this conviction and learned that you were not actually convicted of this offense until July 31, 2018. Since you have already served the entire suspension period for this conviction from March 26, 2015 through September 26, 2015, SCDMV did not delete the prior entry (which shows an incorrect date of conviction and therefore suspension dates which are of legal impossibility. i.e. you cannot serve your suspension for driving under influence prior to being convicted of that offense)?

'[5]' (IMPO)-Based on the evidence presented it is universally impossible to be convicted on July 31, 2018 specifically from the legal point of view. That is, I have been convicted and prosecuted before and after for the same thing, what is even worse is that I am not even aware of them, because the information has been manipulated, especially of events that never happened. In consistency, this is the resolution C.A.No. 2019CP40003207 on June 11, 2019, 3:46 P.M

["Your records on 02/14/2015 are wrong and requested correction. Never existed".]

CHRONOLOGY DRIVER RECORDS MANAGER

Next, on February 20, 2019, SCDMV received a compliance order from New Jersey. This order essentially stated you had paid the tickets associated with your other 6 convictions in New Jersey. This order is attached as "Compliance for FTPTT from New Jersey. SCDMV processed this compliance order on February 20, 2019 for all 6 Failure to Pay Traffic Tickets on your driving record.

Currently your license remains suspended for 6 Failure to Pay Traffic Ticket violations and the Driving Under the Influence conviction due to your failure to meet your reinstatement requirements. To clear these reinstatement requirements you must do the following:

1) Pay \$700 in reinstatement fees to SCDMV. This can be done at any SC DMV field office or online at scdmvonline.com. 2) You must enroll in and complete the ADSAP program (Alcohol, Drug, and other Substance Abuse Program). This is offered in each county of South Carolina. You may have had to take a similar

-impossible from a legal standpoint to suspend or execute it-4-pag.

program to clear your suspension for Driving Under the Influence in New Jersey. If you did take such a course in New Jersey, then you may be able to receive credit for your New Jersey courses through the SC Interstate ADSAP Office. You can reach the SC Interstate ADSAP Office at (843) 821-5412., 3) You must surrender to SCDMV the driver's license issued to you by SCDMV on December 3, 2014.

Once you have completed the above items, you may present yourself for renewal of your driver's license at any of SCDMV's International Offices (these are listed on our website). You will have to take and pass the knowledge and skills tests to be reissued your driver's license. The requirement to take and pass the knowledge and skills tests is required at this time due to your suspension for Driving Under the Influence and the length of time your license has been suspended in South Carolina.

COMPLAINING INTO EFFECT: ["Next, on February 20, 2019, SCDMV received a compliance order from New Jersey. This order essentially stated you had paid the tickets associated with your other 6 convictions in New Jersey"].

(S.C.D. of M.V), (D.R.M); Explicitly and state unequivocally quote: "This Order essentially stated you had paid the tickets associated with your other 6 convictions in New Jersey". Consequently, legal Impossible to happen.

COMPLAINING INTO EFFECT: ["Currently your license remains suspended for 6 Failure to Pay Traffic Ticket violations"]

(1)TICKET

TICKET#12033-LEGALLY IMPOSSIBLE to pay fine for the following: There is no amount to pay, to the court, "(Pay the fine for the ticket to the court.)", Therefore logically impossible, "(When the fine is paid, the court will give you a compliance notice which shows the description of the violation, the date of the violation, the date , the date the ticket was paid, and the ticket number.)", Astronomically impossible to fulfill, "(YOU MUST BRING THIS COMPLIANCE TO YOUR LOCAL DMV OFFICE OR MAIL IT TO DRIVER RECORDS, POST OFFICE BOX 1498, BLYTHEWOOD, SC 29016-0028. NOTE: IT IS YOUR RESPONSIBILITY TO GIVE THE DEPARTMENT PROOF THAT THIS TICKET HAS BEEN PAID OR THE SUSPENSION MAY REMAIN IN EFFECT.)".

S.C.D of M.V 02/27/2015 OFFICIAL NOTICE

REASON: FAILURE TO PAY TRAFFIC TICKET SECTION OF LAW: 56-25-20

VIOL DATE	TICKET#	VIOLATION	BEGINNING DATE:
02/14/2015	126033	Careless Operation	12:01 A.M 03/19/2015

COMPLIANCE:

Pay the fine for the ticket to the court. When the fine is paid, the court will give you a compliance notice which shows the description of the violation, the date of the violation, the date , the date the ticket was paid, and the ticket number. YOU MUST BRING THIS COMPLIANCE TO YOUR LOCAL DMV OFFICE OR MAIL IT TO DRIVER RECORDS, POST OFFICE BOX 1498, BLYTHEWOOD, SC 29016-0028.

-Legally Impossible To Pay-5-pag.

NOTE: IT IS YOUR RESPONSIBILITY TO GIVE THE DEPARTMENT PROOF THAT THIS TICKET HAS BEEN PAID OR THE SUSPENSION MAY REMAIN IN EFFECT.

(2)-TICKET

TICKET#126035-LEGALLY IMPOSSIBLE to pay fines for the following: There is no amount to pay, to the court, "(Pay the fine for the ticket to the court.)", Therefore logically impossible, "(When the fine is paid, the court will give you a compliance notice which shows the description of the violation, the date of the violation, the date , the date the ticket was paid, and the ticket number.)", Astronomically impossible to fulfill, "(YOU MUST BRING THIS COMPLIANCE TO YOUR LOCAL DMV OFFICE OR MAIL IT TO DRIVER RECORDS, POST OFFICE BOX 1498, BLYTHEWOOD, SC 29016-0028. NOTE: IT IS YOUR RESPONSIBILITY TO GIVE THE DEPARTMENT PROOF THAT THIS TICKET HAS BEEN PAID OR THE SUSPENSION MAY REMAIN IN EFFECT.)".

S.C.D of M.V 02/27/2015 OFFICIAL NOTICE

REASON: FAILURE TO PAY TRAFFIC TICKET SECTION OF LAW: 56-25-20

VIOL DATE	TICKET#	VIOLATION	BEGINNING DATE:
02/14/2015	126035	No Signal/Improper Signal	12:01 A.M 03/19/2015

COMPLIANCE: Pay the fine for the ticket to the court. When the fine is paid, the court will give you a compliance notice which shows the description of the violation, the date of the violation, the date , the date the ticket was paid, and the ticket number. YOU MUST BRING THIS COMPLIANCE TO YOUR LOCAL DMV OFFICE OR MAIL IT TO DRIVER RECORDS, POST OFFICE BOX 1498, BLYTHEWOOD, SC 29016-0028. NOTE: IT IS YOUR RESPONSIBILITY TO GIVE THE DEPARTMENT PROOF THAT THIS TICKET HAS BEEN PAID OR THE SUSPENSION MAY REMAIN IN EFFECT.

(3)TICKET

TICKET#126037-LEGALLY IMPOSSIBLE to pay fines for the following: There is no amount to pay, to the court, "(Pay the fine for the ticket to the court.)", Therefore logically impossible, "(When the fine is paid, the court will give you a compliance notice which shows the description of the violation, the date of the violation, the date , the date the ticket was paid, and the ticket number.)", Astronomically impossible to fulfill, "(YOU MUST BRING THIS COMPLIANCE TO YOUR LOCAL DMV OFFICE OR MAIL IT TO DRIVER RECORDS, POST OFFICE BOX 1498, BLYTHEWOOD, SC 29016-0028. NOTE: IT IS YOUR RESPONSIBILITY TO GIVE THE DEPARTMENT PROOF THAT THIS TICKET HAS BEEN PAID OR THE SUSPENSION MAY REMAIN IN EFFECT.)".

S.C.D of M.V 02/27/2015 OFFICIAL NOTICE

REASON: FAILURE TO PAY TRAFFIC TICKET SECTION OF LAW: 56-25-20

VIOL DATE	TICKET#	VIOLATION	BEGINNING DATE:
02/14/2015	126037	No Registration in possession	12:01 A.M 03/19/2015

-Legally Impossible To Pay-6-pag.

COMPLIANCE: Pay the fine for the ticket to the court. When the fine is paid, the court will give you a compliance notice which shows the description of the violation, the date of the violation, the date , the date the ticket was paid, and the ticket number. YOU MUST BRING THIS COMPLIANCE TO YOUR LOCAL DMV OFFICE OR MAIL IT TO DRIVER RECORDS, POST OFFICE BOX 1498, BLYTHEWOOD, SC 29016-0028. NOTE: IT IS YOUR RESPONSIBILITY TO GIVE THE DEPARTMENT PROOF THAT THIS TICKET HAS BEEN PAID OR THE SUSPENSION MAY REMAIN IN EFFECT.

(4)-TICKET

TICKET#126036-LEGALLY IMPOSSIBLE to pay fines for the following: There is no amount to pay, to the court, "(Pay the fine for the ticket to the court.)", Therefore logically impossible, "(When the fine is paid, the court will give you a compliance notice which shows the description of the violation, the date of the violation, the date , the date the ticket was paid, and the ticket number.)", Astronomically impossible to fulfill, "(YOU MUST BRING THIS COMPLIANCE TO YOUR LOCAL DMV OFFICE OR MAIL IT TO DRIVER RECORDS, POST OFFICE BOX 1498, BLYTHEWOOD, SC 29016-0028. NOTE: IT IS YOUR RESPONSIBILITY TO GIVE THE DEPARTMENT PROOF THAT THIS TICKET HAS BEEN PAID OR THE SUSPENSION MAY REMAIN IN EFFECT.)".

S.C.D of M.V 03/02/2015 OFFICIAL NOTICE

REASON: FAILURE TO PAY TRAFFIC TICKET SECTION OF LAW: 56-25-20

VIOL DATE	TICKET#	VIOLATION	BEGINNING DATE:
02/14/2015	126037	Driving License Violation	12:01 A.M 03/22/2015

COMPLIANCE: Pay the fine for the ticket to the court. When the fine is paid, the court will give you a compliance notice which shows the description of the violation, the date of the violation, the date , the date the ticket was paid, and the ticket number. YOU MUST BRING THIS COMPLIANCE TO YOUR LOCAL DMV OFFICE OR MAIL IT TO DRIVER RECORDS, POST OFFICE BOX 1498, BLYTHEWOOD, SC 29016-0028. NOTE: IT IS YOUR RESPONSIBILITY TO GIVE THE DEPARTMENT PROOF THAT THIS TICKET HAS BEEN PAID OR THE SUSPENSION MAY REMAIN IN EFFECT.

(5)-TICKET

TICKET#126032-LEGALLY IMPOSSIBLE to pay fines for the following: There is no amount to pay, to the court, "(Pay the fine for the ticket to the court.)", Therefore logically impossible, "(When the fine is paid, the court will give you a compliance notice which shows the description of the violation, the date of the violation, the date , the date the ticket was paid, and the ticket number.)", Astronomically impossible to fulfill, "(YOU MUST BRING THIS COMPLIANCE TO YOUR LOCAL DMV OFFICE OR MAIL IT TO DRIVER RECORDS, POST OFFICE BOX 1498, BLYTHEWOOD, SC 29016-0028. NOTE: IT IS YOUR RESPONSIBILITY TO GIVE THE DEPARTMENT PROOF THAT THIS TICKET HAS BEEN PAID OR THE SUSPENSION MAY REMAIN IN EFFECT.)".

S.C.D of M.V 03/04/2015 OFFICIAL NOTICE

REASON: FAILURE TO PAY TRAFFIC TICKET SECTION OF LAW: 56-25-20

VIOL DATE	TICKET#	VIOLATION	BEGINNING DATE:
02/14/2015	126032	Controlled Substance	12:01 A.M 03/22/2015

COMPLIANCE:

Pay the fine for the ticket to the court. When the fine is paid, the court will give you a compliance notice which shows the description of the violation, the date of the violation, the date , the date the ticket was paid, and the ticket number. YOU MUST BRING THIS COMPLIANCE TO YOUR LOCAL DMV OFFICE OR MAIL IT TO DRIVER RECORDS, POST OFFICE BOX 1498, BLYTHEWOOD, SC 29016-0028. NOTE: IT IS YOUR RESPONSIBILITY TO GIVE THE DEPARTMENT PROOF THAT THIS TICKET HAS BEEN PAID OR THE SUSPENSION MAY REMAIN IN EFFECT.

(6)-TICKET

TICKET#126034-LEGALLY IMPOSSIBLE to pay fines for the following: There is no amount to pay, to the court, "(Pay the fine for the ticket to the court.)", Therefore logically impossible, "(When the fine is paid, the court will give you a compliance notice which shows the description of the violation, the date of the violation, the date , the date the ticket was paid, and the ticket number.)", Astronomically impossible to fulfill, "(YOU MUST BRING THIS COMPLIANCE TO YOUR LOCAL DMV OFFICE OR MAIL IT TO DRIVER RECORDS, POST OFFICE BOX 1498, BLYTHEWOOD, SC 29016-0028. NOTE: IT IS YOUR RESPONSIBILITY TO GIVE THE DEPARTMENT PROOF THAT THIS TICKET HAS BEEN PAID OR THE SUSPENSION MAY REMAIN IN EFFECT.)".

S.C.D of M.V 03/04/2015 OFFICIAL NOTICE

REASON: FAILURE TO PAY TRAFFIC TICKET SECTION OF LAW: 56-25-20

VIOL DATE	TICKET#	VIOLATION	BEGINNING DATE:
02/14/2015	126032	Improper Light	12:01 A.M 03/22/2015

COMPLIANCE:

Pay the fine for the ticket to the court. When the fine is paid, the court will give you a compliance notice which shows the description of the violation, the date of the violation, the date , the date the ticket was paid, and the ticket number. YOU MUST BRING THIS COMPLIANCE TO YOUR LOCAL DMV OFFICE OR MAIL IT TO DRIVER RECORDS, POST OFFICE BOX 1498, BLYTHEWOOD, SC 29016-0028. NOTE: IT IS YOUR RESPONSIBILITY TO GIVE THE DEPARTMENT PROOF THAT THIS TICKET HAS BEEN PAID OR THE SUSPENSION MAY REMAIN IN EFFECT.

-legally Impossible To Pay-8-pag.

COMPLAINING INTO EFFECT: ["and the Driving Under the Influence conviction due to your failure to meet your reinstatement requirements."]

It is extraordinarily impossible to meet this requirement:

'[1]' (IMPO)-misrepresentation of facts that do not exist: Having been convicted of all of these offenses including Driving Under the Influence on February 14, 2015 the concept of "except" it's totally IMPOSSIBLE TO APPLY. When making the following reference, "We posted this conviction to your driving record on March 11, 2015"; Procedure for the execution of conviction and suspension from March 26, 2015 through September 26, 2015.

SCDMV, according to its official notice, (03/11/2015), it is executed in the following manner:

03/11/2015 - VIOL DATE: 02/14/2015 - CONV DATE: 02/14/2015 TICKET# 126031

BEGINNING DATE: 12:01 AM 03/26/2015 ENDING DATE: Midnight 09/26/2015

Quote from the following reference:

"[Later SCDMV was again notified of this conviction and learned that you were not actually completed of this offense until July 31, 2015. Since you have already served the entire suspension period for this conviction from March 26, 2015 through September 26, 2015, SCDMV did not delete the motor entry (which shows an incorrect date of conviction and, therefore, suspension dates which are a legal impossibility, i.e. you cannot serve your suspension for driving under influence prior to being convicted of that offense).]"

'[2]' (IMPO)-Misrepresentation, suppression, omission of events and transposition of dates.

Quote from the following reference:

"[Next, on February 20, 2019 SCDMV received a compliance Order from New Jersey. This Order essentially stated you had paid the tickets associated with your other 6 convictions in New Jersey. This Order is attached as "Compliance for FTIT from New Jersey.]"

'[3]' (IMPO)-It is legally impossible for (S.C.D.of M.V),(D.R.M); send a notice of Conviction on February 24, 2015, which has never happened (how does it state above). Furthermore it is legally impossible to commit a traffic violation, be convicted and send the notice all at the same time.

-impossible to meet this requirement-9-pag

REASON: You have been convicted of the offense listed below
SECTION OF LAW: ~~56-5-2930~~
VIOL DATE: 02/14/2015 - CONV DATE: 02/14/2015 TICKET# 126031
BEGINNING DATE: 12:01 AM 03/26/2015 ENDING DATE: Midnight 09/26/2015

Therefore, all of the above mentioned never took place, failing which it is impossible to comply with any requirement arising from this.

'[4]'(IMPO)-(S.C.D. of M.V),(D.R.M); Posted and Sent a LETTER notifying (D.U.I), on March 11, 2015 and proceeding with the suspension from March 26, 2015 through September 26, 2015.

REASON: You have been convicted of the offense listed below
SECTION OF LAW: ~~56-5-2930~~
VIOL DATE: 02/14/2015 - CONV DATE: 02/14/2015 - TICKET# 126031
BEGINNING DATE: 12:01 AM 03/26/2015 ENDING DATE: Midnight 09/26/2015

Thus, it is totally impossible from a legal standpoint to suspend or execute it because this fact never existed.

SCDMV, according to its official notice,(03/11/2015), it is executed in the following manner:

03/11/2015 - VIOL DATE: 02/14/2015 - CONV DATE: 02/14/2015 TICKET# 126031
BEGINNING DATE: 12:01 AM 03/26/2015 ENDING DATE: Midnight 09/26/2015

'[5]'(IMPO)-Based on the evidence presented it is universally impossible to be convicted on July 31, 2018 specifically from the legal point of view. That is, I have been convicted and prosecuted before and after for the same thing, what is even worse is that I am not even aware of them, because the information has been manipulated, especially of events that never happened. In consistency, this is the resolution C.A.No. 2019CP40003207 on June 11, 2019, 3:46 P.M

["Your records on 02/14/2015 are wrong and requested correction. Never existed".]

COMPLAINING INTO EFFECT: 1) ["Pay \$700 in reinstatement fees to SCDMV".]

This situation has literally put me in misery and yet they are charging me for something that I did not and that does not exist, being in an intense depressive state, it is more They are the one who should pay me and I even estimate that the amounts due it \$1,760,000.00 damage caused. Considering I've paid thousands of thousands of dollars. Therefore, I request this honorable court to consider my request for compensation and to award it immediately in accordance with the law.

-universally impossible-10-pag.

COMPLAINING INTO EFFECT: ["(2) You must enroll in and complete the ADSAP program (Alcohol, Drug, and other Substance Abuse Program)".]

Since there is no conviction, there is no order. It is impossible to comply with this requirement, just as it is logically, any human being who can solve the equation $1 + 1$ and $2 + 2$ will then be able to deduce that if there is no conviction there can be no sentence.

It is extraordinarily impossible to meet this requirement:

'[1A]' (IMPO)-misrepresentation of facts that do not exist: Having been convicted of all of these offenses including Driving Under the Influence on February 14, 2015 the concept of "except" it's totally IMPOSSIBLE TO APPLY. When making the following reference, "We posted this conviction to your driving record on March 11, 2015"; Procedure for the execution of conviction and suspension from March 26, 2015 through September 26, 2015.

SCDMV, according to its official notice, (03/11/2015), it is executed in the following manner:

03/11/2015 - VIOL DATE: 02/14/2015 - CONV DATE: 02/14/2015 TICKET# 126031

BEGINNING DATE: 12:01 AM 03/26/2015 ENDING DATE: Midnight 09/26/2015

Quote from the following reference:

"[Later SCDMV was again notified of this conviction and learned that you were not actually convicted of this offense until July 31, 2018. Since you have already served the entire suspension period for this conviction from March 26, 2015 through September 26, 2015, SCDMV did not delete the prior entry (which shows an incorrect date of conviction and, therefore, suspension dates which are a legal impossibility, i.e. you cannot serve your suspension for driving under influence prior to being convicted of that offense)]."

'[2B]' (IMPO)-Misrepresentation, suppression, omission of events and transposition of dates: when SCDMV claimed that they apparently received the order to comply with all the offenses on February 20, 2019.

Quote from the following reference:

"[Next, on February 20, 2019, SCDMV received a compliance Order from New Jersey. This Order essentially stated you had paid the tickets associated with your other 6 convictions in New Jersey. This Order is attached as "Compliance for firm from New Jersey."]

'[3C]'(IMPO)-It is legally impossible for (S.C.D.of M.V),(D.R.M); send a notice of Conviction on February 24, 2015, which has never happened (how does it state above). Furthermore it is legally impossible to commit a traffic violation, be convicted and send the notice all at the same time.

REASON: You have been convicted of the offense listed below

SECTION OF LAW: 56-5-2930

VIOL DATE: 02/14/2015 - CONV DATE: 02/14/2015 TICKET# 126031

BEGINNING DATE: 12:01 AM 03/26/2015 ENDING DATE: Midnight 09/26/2015

Therefore, all of the above mentioned never took place, failing which it is impossible to comply with any requirement arising from this.

'[4D]'(IMPO)-(S.C.D. of M.V),(D.R.M); Posted and Sent a LETTER notifying (D.U.I), on March 11, 2015 and proceeding with the suspension from March 26, 2015 through September 26, 2015.

REASON: You have been convicted of the offense listed below

SECTION OF LAW: 56-5-2930

VIOL DATE: 02/14/2015 - CONV DATE: 02/14/2015 - TICKET# 126031

BEGINNING DATE: 12:01 AM 03/26/2015 ENDING DATE: Midnight 09/26/2015

Thus, it is totally impossible from a legal standpoint to suspend or execute it because this fact never existed.

SCDMV, according to its official notice, (03/11/2015), it is executed in the following manner:

03/11/2015 - VIOL DATE: 02/14/2015 - CONV DATE: 02/14/2015 TICKET# 126031

BEGINNING DATE: 12:01 AM 03/26/2015 ENDING DATE: Midnight 09/26/2015

'[5E]'(IMPO)-Based on the evidence presented it is universally impossible to be convicted on July 31, 2018 specifically from the legal point of view. That is, I have been convicted and prosecuted before and after for the same thing, what is even worse is that I am not even aware of them, because the information has been manipulated, especially of events that never happened. In consistency, this is the resolution C.A.No. 2019CP40003207 on June 11, 2019, 3:46 P.M

["Your records on 02/14/2015 are wrong and requested correction. Never existed".]

Basically what S.C.D.of M.V., D.R.M., claim has not yet happened and what they claimed and requested did not happen because it did not exist.

**S.C. Department Of Motor Vehicles
Reinstatement Requirement
3/6/2019 11:17:55**

Outstanding Fees:

\$100.00 DL SUSPENSION REINSTATEMENT for Failure to Pay Traffic Ticket
\$100.00 DL SUSPENSION REINSTATEMENT for Failure to Pay Traffic Ticket
\$100.00 DL SUSPENSION REINSTATEMENT for Failure to Pay Traffic Ticket
\$100.00 DL SUSPENSION REINSTATEMENT for Failure to Pay Traffic Ticket
\$100.00 DL SUSPENSION REINSTATEMENT for Failure to Pay Traffic Ticket
\$100.00 DL SUSPENSION REINSTATEMENT for Failure to Pay Traffic Ticket
\$100.00 DL SUSPENSION REINSTATEMENT for Failure to Pay Traffic Ticket

Suspension to be served:

Regular License Suspended

From 03/19/2015 until Requirement Met for Failure to Pay Traffic Ticket on 02/14/2015
From 03/19/2015 until Requirement Met for Failure to Pay Traffic Ticket on 02/14/2015
From 03/19/2015 until Requirement Met for Failure to Pay Traffic Ticket on 02/14/2015
From 03/22/2015 until Requirement Met for Failure to Pay Traffic Ticket on 02/14/2015
From 03/24/2015 until Requirement Met for Failure to Pay Traffic Ticket on 02/14/2015
From 03/24/2015 until Requirement Met for Failure to Pay Traffic Ticket on 02/14/2015
From 03/26/2015 until 09/26/2015 for Driving Under the Influence on 02/14/2015

**S.C. Department Of Motor Vehicles
Reinstatement Requirement
3/15/2019 10:55:50**

Outstanding Fees:

\$100.00 DL SUSPENSION REINSTATEMENT for Failure to Pay Traffic Ticket
\$100.00 DL SUSPENSION REINSTATEMENT for Failure to Pay Traffic Ticket
\$100.00 DL SUSPENSION REINSTATEMENT for Failure to Pay Traffic Ticket
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\$100.00 DL SUSPENSION REINSTATEMENT for Failure to Pay Traffic Ticket
\$100.00 DL SUSPENSION REINSTATEMENT for Failure to Pay Traffic Ticket

Suspension to be served:

Regular License Suspended

From 03/19/2015 until Requirement Met for Failure to Pay Traffic Ticket on 02/14/2015
From 03/19/2015 until Requirement Met for Failure to Pay Traffic Ticket on 02/14/2015
From 03/19/2015 until Requirement Met for Failure to Pay Traffic Ticket on 02/14/2015
From 03/22/2015 until Requirement Met for Failure to Pay Traffic Ticket on 02/14/2015
From 03/24/2015 until Requirement Met for Failure to Pay Traffic Ticket on 02/14/2015
From 03/24/2015 until Requirement Met for Failure to Pay Traffic Ticket on 02/14/2015
From 03/26/2015 until 09/26/2015 for Driving Under the Influence on 02/14/2015

FROM 02/14/2015 FROM THIS DAY UNTIL TODAY AND CONTINUING INDEFINITELY-13-pag

RESOLUTION OF THE COMPLAINTS

I therefore demand that each and every one of the above mentioned files be removed, deleted, expungement AND my driver's license be restored immediately.

The content of the following paragraph: "Pag.10", "COMPLAINING INTO:700"



Federico Castro

gchome19@gmail.com

[With their own evidence and before their eyes, knowing that it is impossible to comply with these requirements, they continue to violate my civil and constitutional rights.]

"-Pag.10-(700)-14-pag

1

'Next I will mention one of the many consequences that this situation has produced for me. I have to see a doctor and get some test done, among other things, I have not seen my grandchildren, I have not been able to spend time with my childrens, there have been a few occasions where I have been planning buses, taxis, Uber, lyft, bothering friends, I want to go to church, I have not been able to see my mother, I have wanted to visit aunts, I have wanted to go to several places, all this has affected me so much that I have not been able to work. I have not been able to take care of myself. I have not made money, there have been so many things that I have lost because I have been dying slowly, this situation has been killing me and it is a permanent sentence that I'm asking this honorable court with all the power that has been conferred upon it, wisdom, intelligence, good sanity, moral principles, humanity and above all things common sense. Apply the Law based on the facts, advocating for neutral and fair conditions.

RESPONDENT SOUTH CAROLINA
DEPARTMENT OF MOTOR VEHICLES

EXHIBIT D

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Federico Castro

Plaintiff,

v.

South Carolina Department of Motor Vehicles
Driver Records Manager,

Defendant.

IN THE COURT OF COMMON PLEAS

Civil Action No. 24-CP-40-05272

ORDER FOR SUMMARY JUDGMENT

This matter was heard on December 5, 2024, on a Motion to Dismiss filed by Defendant South Carolina Department of Motor Vehicles (SCDMV) to regain his driving privileges. This Court makes the following findings:

a. Rules 12(b)(4) and (6), SCRPC

Standard of Review for Motion to Dismiss Under Rule 12(b)(6)

Under Rule 12(b)(6), SCRPC, a defendant may move to dismiss a complaint based on a failure to state facts sufficient to constitute a cause of action. In considering such a motion, the trial court must base its ruling solely on the allegations set forth in the complaint. If the facts and inferences drawn from the facts alleged in the complaint, viewed in the light most favorable to the plaintiff, would entitle the plaintiff to relief on any theory, then the grant of a motion to dismiss for failure to state a claim is improper. *Bergstrom v. Palmetto Health Alliance*, 358 S. C. 388, 596 S. E. 2d 42, *reh. den.* (2004); *Baird v. Charleston County*, 333 S.C. 519, 511 S.E.2d 69 (1999).

A motion to dismiss for failure to state a cause of action must be granted if, viewing the evidence in favor of the plaintiff, the facts reasonably deducible therefrom do not entitle the plaintiff to relief on any theory. *Brown v. Theos*, 338 S. C. 305, 526 S. E. 2d 232, *reh. den.* (Ct. App. 1999).

Allegations of the Plaintiff

The Plaintiff's allegations never identify any cause of action by name. In fact, the Plaintiff's allegations appear to be quotes taken from an October 8, 2019, e-mail from the undersigned to Plaintiff in which the undersigned informed Plaintiff of the steps he needed to take, as of that date, to clear his driver's license suspensions. The Plaintiff's allegations also appear to be non-sensical, argumentative statements made between various quotes from the e-mail contained in Defendant SCDMV's Exhibit A attached to a Motion to Dismiss, as well as various notices of suspension that have been mailed from SCDMV to the Plaintiff. Further, because of the formatting throughout Plaintiff's allegations and a lack of headings or titles, it is extremely difficult to identify where Plaintiff's allegations/arguments begin and end relative to the quotes from the e-mail contained at Exhibit A and the various suspension letters issued to Plaintiff.

In fact, the only parts of Plaintiff's Complaint that appear to state anything with any clarity are: 1) the section titled "Resolution of the Complaints;" and 2) a paragraph at the bottom of page 10 of the Complaint. In the section titled "Resolution of the Complaints" Plaintiff states that he demands "that each and every one of the above mentioned files be removed, deleted, expungement AND my driver's license be restored immediately." Because of the lack of clarity in the rest of the Complaint, however, it is unclear which "files" Plaintiff is asking to have removed, deleted, and expunged from his driving record. In the paragraph at the bottom of page 10 of the Complaint, Plaintiff is clear that he believes he has suffered \$1,760,000.00 in damages and that he should be compensated for that amount. In making this demand, however, Plaintiff does not set forth how SCDMV has caused these alleged damages or why SCDMV should pay this amount to Plaintiff.

Due to the numerous issues with how this Complaint is drafted, SCDMV asserts this case should be dismissed due to failure to state a claim and insufficiency of process. Alternatively, if

this case is not dismissed for failure to state a claim and/or insufficiency of process, Plaintiff should be required to redraft his Complaint in a format consistent with the requirements of Rules 8 and 10, SCRCP, including the requirement that pleadings be concise and direct. In short, if this case is to continue, SCDMV and the Court should be able to tell from the Complaint what the legal claims are against SCDMV and not have to guess or assume what the legal claims are, particularly since the Plaintiff is asking for more than \$1.7 million dollars in damages.

b. Res Judicata & Claim Has Been Filed Outside the Statute of Limitations

Plaintiff has previously sued the SCDMV related to suspensions on his driving record. See 2019-CP-40-03207, dismissed on October 9, 2019, by Judge Casey Manning. A copy of the final order from that case was attached as Exhibit B to Defendant's motion. To the extent Plaintiff may attempt to litigate the same issues raised in the 2019 case he brought against SCDMV again, SCDMV asserts that Plaintiff's claims are untimely and constitute res judicata. See *Judy v. Martin*, 381 S.C. 455, 458, 674 S.E.2d 151, 153 (2009) ("Appellant may not seek relief from the prior unappealed order of the circuit court because the order has become the law of the case."); see also *Buckner v. Preferred Mut. Ins. Co.*, 255 S.C. 159, 160–61, 177 S.E.2d 544, 544 (1970) (holding an unappealed ruling, right or wrong, is the law of the case). Under the doctrine of res judicata, "[a] litigant is barred from raising any issues which were adjudicated in the former suit and any issues which might have been raised in the former suit." *Hilton Head Center of South Carolina, Inc. v. Public Service Comm'n of South Carolina*, 294 S.C. 9, 11, 362 S.E.2d 176, 177 (1987). To establish res judicata, the defendant must prove the following three elements: (1) identity of the parties; (2) identity of the subject matter; and (3) adjudication of the issue in the former suit. *Riedman Corp. v. Greenville Steel Structures, Inc.*, 308 S.C. 467, 419 S.E.2d 217 (1992); *Sealy v. Dodge*, 289 S.C. 543, 347 S.E.2d 504 (1986). In this case, the parties appear to be the same as in

the prior case: Plaintiff and the SCDMV. In this case, based on the drafting of the Complaint, it appears the subject matter of the litigation is also the same: whether SCDMV properly applied suspensions to Plaintiff's driving record. Finally, in this case, the issue regarding whether SCDMV properly applied suspensions to Plaintiff's driving record was dismissed due to the Plaintiff's prior failure to state a clear claim against the SCDMV (as well as for other reasons). As noted in footnote 1 of Judge Manning's final order in the 2019-CP-40-03207 case involving Plaintiff and SCDMV, Judge Manning specifically noted that Plaintiff would provide the undersigned with his driver's license number so that the undersigned could provide Plaintiff with the information needed to resolve his suspension issues (indicating the prior litigation involved Plaintiff's suspension issues). As demonstrated by the e-mail sent from the undersigned to Plaintiff on October 8, 2019, the Plaintiff provided his driver's license number to the undersigned and the undersigned advised the Plaintiff of how he could resolve his suspension issues with the SCDMV. As of October 8, 2019, Plaintiff was suspended for Driving Under the Influence and six Failure to Pay Traffic Ticket offenses that occurred in New Jersey and were transmitted to SCDMV pursuant to the Nonresident Traffic Violator Compact ("NRVC"), S.C. Code §56-25-10 et seq. As of October 8, 2019, and continuing as of the filing of this motion, to clear these suspensions, Plaintiff must do the following, in this recommended order:

- 1) Enroll in and complete ADSAP; and
- 2) Pay \$700 in reinstatement fees to SCDMV.

Once Plaintiff completes both of these items, he will be eligible to apply for a South Carolina driver's license again. Since Plaintiff quotes the October 9, 2019, e-mail extensively in his Complaint, it appears that this current action is essentially about the same issues raised in case

2019-CP-40-03207, which was dismissed by Judge Manning. For these reasons, this case constitutes res judicata.

Further, because Plaintiff previously filed litigation against SCDMV regarding what appear to be the same exact suspension issues, Plaintiff's current claims are untimely filed and must be dismissed. Claims against a South Carolina government agency generally must be brought within two years after the loss was or should have been discovered. S.C. Code §15-78-100(a). That two-year period of time may be extended to three years if a verified claim for damages is filed and disallowed or rejected. *Id.* With the understanding and belief that the suspension issues raised by Plaintiff in the 2019-CP-40-03207 case against SCDMV are the same issues Plaintiff is attempting to litigate in this case, Plaintiff's claims in this case are well past the two and three year deadlines and, for that reason, this case should be dismissed with prejudice.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that this action is dismissed with prejudice due to: 1) failure to state facts sufficient to constitute a cause of action; 2) res judicata; and 3) failing to file a claim within the statute of limitations.

IT IS SO ORDERED.

s/
The Honorable T.W. McGee, III
Circuit Judge At-Large

_____, 2025
Columbia, South Carolina



Richland Common Pleas

Case Caption: Federico Castro vs Scdmv Driver Records Manager , defendant, et al
Case Number: 2024CP4005272
Type: Order/Other

So Ordered

s/ Thomas W. McGee III, Judge Code 2786

Electronically signed on 2025-05-29 15:49:21 page 6 of 6

RESPONDENT SOUTH CAROLINA
DEPARTMENT OF MOTOR VEHICLES

EXHIBIT E

NOTICE OF APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

Thomas W. McGee III, Judge Code 2786

Appellate Case No. 2025-000532

NOTICE OF APPEAL

Federico Castro, appeals the **Statement of Judgment** of the Honorable Thomas W. McGee III, Judge Code 2786 dated **2025 Jan 07 12:10 PM - RICHLAND - COMMON PLEAS - CASE#2024CP4005272**. Appellant received written notice of this **Statement of Judgment** on Friday, Jan 24, 2025 1:21 PM in the mailbox.

Mar 31, 2025

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 03-31-25

RICHLAND COUNTY
FILED
2025 APR -9 AM 9:37
EANNETTE W. McBRIDE
C.C.P., G.S., & F.C.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Thomas William McGee, III, Circuit Court Judge

Case No. 2025-000532

Federico CastroAppellant,

v.

South Carolina Department of Motor Vehicles Respondent.

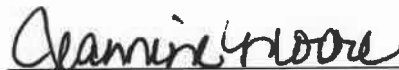
PROOF OF SERVICE

I HEREBY CERTIFY that I have served the Respondent's Return to Appellant's Motion to Reinstate by depositing a copy of same in the United States Mail, postage prepaid, on August 14, 2025, addressed to the Appellant and the Richland County Court of Common Pleas as follows:

Federico Castro, Pro Se
90 Garrison Court
Ridgeland, South Carolina 29936

Federico Castro, Pro Se
2102 Blacker Boulevard
Bluffton, South Carolina 29909 And via email to: gchome19@gmail.com
(Federico Castro)

The Honorable Thomas William McGee, III
Richland County Court of Common Pleas
1701 Main Street
Columbia, South Carolina 29201


Jeannine (Nina) Moore, Senior Lit. Paralegal
Office of General Counsel

August 14, 2025
Blythewood, South Carolina