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Oct 15 2025
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
WILLIAM H. SEALS, JR., CIRCUIT COURT JUDGE

Appellate Case No. 2025-000796

Gabriel Barnhill and GSB Enterprises, LLC, Respondents,
v.

J. Floyd Swilley, J. Floyd Swilley Investment Advisors,
Laurel K. Swilley, SMG Partners, LLC, SMS Services, LP,
WCP Limited, LLC, 809 Holdings, LP, QC Financing, LLC
Heath Causey and Sage Financial Group, LLC, Defendants,

of which J. Floyd Swilley, Laurel Swilley and
Heath Causey are the Appellants.

**MOTION FOR LEAVE TO
FILE AMENDED NOTICE OF APPEAL**

Appellants J. Floyd Swilley, Laurel Swilley, and Heath Causey (hereafter “Appellants”) initially filed the Notice of Appeal in the above-captioned matter on April 24, 2025. Referenced in that notice were four orders from the trial court that were the subject of this appeal. All four orders were correctly referenced and fully identified in that notice. Copies of the referenced orders were included as attachments thereto.

Appellants subsequently filed their initial brief on July 28, 2025, and Respondent’s Initial Brief was later filed on September 18, 2025. In Respondent’s brief, Respondents referenced an error in the attachments to the Notice of Appeal. To wit, the fourth attachment to the Notice of Appeal was, inadvertently, not a copy of the referenced fourth among the orders being appealed.

The inadvertently included fourth attachment consisted of a copy of an order dated April 21, 2025, which granted Appellants' own motion (filed post-judgment and post-denial of Rule 59(e) motion seeking to alter judgment) to deposit funds with the circuit court clerk pursuant to Rule 67. It was immediately, facially, and undeniably obvious that such order was not the subject of any appeal by Appellants, considering the order merely granted relief sought by Appellants in their own motion below, and considering the detailed description in the Notice of Appeal itself of the intended fourth order to be appealed. That fourth order was identified in the Notice of Appeal as an "(4) Order filed April 2, 2025, which amended the November 6, 2024 order of judgment following cross-motions pursuant to Rule 59(e), with such order received by Appellants on April 2, 2025."

Accordingly, Appellants move for leave to submit the attached proposed Amended Notice of Appeal, which includes the proper attachments obviously intended and referenced in the initial notice, and which conforms the notice to the matters that have been initially briefed and contested thus far during this appeal.

Respectfully submitted,

s/ Harvey M. Watson III
Desa Ballard (S.C. Bar No. 498)
Harvey M. Watson III (S.C. Bar No. 74053)
Haley Hubbard (S.C. Bar No. 103195)

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ATTORNEYS FOR APPELLANTS

October 15, 2025

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
WILLIAM H. SEALS, JR., CIRCUIT COURT JUDGE

Appellate Case No. 2025-000796

Gabriel Barnhill and GSB Enterprises, LLC, Respondents,
v.

J. Floyd Swilley, J. Floyd Swilley Investment Advisors,
Laurel K. Swilley, SMG Partners, LLC, SMS Services, LP,
WCP Limited, LLC, 809 Holdings, LP, QC Financing, LLC
Heath Causey and Sage Financial Group, LLC, Defendants,

of which J. Floyd Swilley, Laurel Swilley and
Heath Causey are the Appellants.

AMENDED¹
NOTICE OF APPEAL

Appellants J. Floyd Swilley, Laurel Swilley, and Heath Causey (hereafter “Appellants”) appeal from the trial court’s (1) Form 4 Order dated June 18, 2024 denying the motion for relief from entry of default; (2) Form 4 Order filed July 15, 2024 denying reconsideration of the June 18, 2024 order; (3) Order filed November 6, 2024 granting judgment to Respondents against Appellants, which was received by Appellants on November 6, 2024; and (4) Order filed April 2,

¹ This Amended Notice has been amended for purposes of correcting a scrivener’s error in the initial notice that was pointed out in Respondents Brief. The error was that while the notice fully and correctly identified the fourth order of the lower court being appealed in this matter, attached by mistake in the place of that order being appealed was a copy of an unrelated order that is not being appealed in this matter. Copies of all four orders referenced in this notice, including an appropriate copy of that true fourth order on appeal herein, are attached hereto.

2025, which amended the November 6, 2024 order of judgment following cross-motions pursuant to Rule 59(e), with such order received by Appellants on April 2, 2025.

Respectfully submitted,

s/ Desa Ballard

Desa Ballard (S.C. Bar No. 498)
Harvey M. Watson III (S.C. Bar No. 74053)
Haley Hubbard (S.C. Bar No. 103195)

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ATTORNEYS FOR APPELLANTS

October 9, 2025

Other counsel of record:

Nate Fata, Esquire
NATE FATA, PA
Post Office Box 16620
Surfside Beach, South Carolina 29587
ATTORNEY FOR RESPONDENTS

Gabriel Barnhill et al
PLAINTIFF(S)

J Floyd Swilley et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit); Rule 43(k), SCRPC (Settled);
 Other
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; Bankruptcy;
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded;
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

Defendant, 809 Holdings LP's Motion for Withdrawal of Counsel is GRANTED.

Defendant, J Floyd Swilley's Motion for Relief from Entry of Default is DENIED.

Plaintiff, Gabriel Barnhill's Motion for Default Judgment is GRANTED to the extent that denial of Defendant's Motion for Relief from Entry of Default means that those defendants are in default. A hearing to determine damages and relief sought in plaintiff's Complaint will be scheduled.

ORDER INFORMATION

This order ends does not end the case. See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 06/18/2024 .

Jarrett Skipper Calder for 9 1 1 Plumbing LLC
 J Floyd Swilley SMG Partners LLC
 QC Financing LLC
 Christopher Pitcock
 Sage Funding LP
 Digics LLC
 SAFE Inc
 Secured Asset Factoring Exchange Inc
 Sage Private Equity Group
 Sage Advisory Group LP
 Alicia A Piner

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.



Horry Common Pleas

Case Caption: Gabriel Barnhill , plaintiff, et al VS J Floyd Swilley , defendant, et al

Case Number: 2014CP2608367

Type: Order/Electronic Form 4

Presiding Circuit Court Judge

s/Benjamin H. Culbertson, Judge Code 2148

Gabriel Barnhill et al
PLAINTIFF(S)

J Floyd Swilley et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit); Rule 43(k), SCRPC (Settled);
 Other
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; Bankruptcy;
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded;
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

The Motion to Reconsider filed by the defendants J. Floyd Swilley, Laurel Swilley and Heath Causey on 6/28/2024 is DENIED.

This motion is decided on the contents of the defendants' motion and the plaintiff memorandum in opposition to the motion, without oral arguments.

ORDER INFORMATION

This order ends does not end the case. See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 07/15/2024 .

Jarrett Skipper Calder for 9 1 1 Plumbing LLC
J Floyd Swilley SMG Partners LLC
QC Financing LLC
Christopher Pitcock
Sage Funding LP
Digics LLC
SAFE Inc
Secured Asset Factoring Exchange Inc
Sage Private Equity Group
Sage Advisory Group LP
Alicia A Piner

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.



Horry Common Pleas

Case Caption: Gabriel Barnhill , plaintiff, et al VS J Floyd Swilley , defendant, et al

Case Number: 2014CP2608367

Type: Order/Electronic Form 4

Presiding Circuit Court Judge

s/Benjamin H. Culbertson, Judge Code 2148

STATE OF SOUTH)
CAROLINA)
COUNTY OF HORRY)
Gabriel Barnhill and GSB)
Enterprises, LLC,)
Plaintiffs,)
vs.)
J. Floyd Swilley, J. Floyd)
Swilley Investment Advisors,)
Laurel K. Swilley, SMG)
Partners, LLC, SMS Services,)
LP, QC Financing, LLC,)
Heath Causey, and Sage)
Financial Group, LLC)
Defendants.)

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT
Civil Case No.: 2014-CP-26-08367

HEARING JUDGE:
PLAINTIFF’S ATTORNEY:
DEFENDANT’S ATTORNEY:
DATE OF HEARING:
COURT REPORTER:

Honorable William H. Seals,
Nate Fata
Desa Ballard
September 12, 2024
Natalie Dahl

This case has a long and tortious history. However, after same, such is finally before the court to determine damages as the defendants, J. Floyd Swilley, Laurel K. Swilley, and Heath Causey are in default. The Swilleys and Mr. Causey had their answer struck by the Court pursuant to an order previously signed. This hearing was held pursuant to the directives set out in Tommy E. Brown, Sr. v. Allstate Insurance Company, 544 S.C. 21 (2001).

This Court finds based on the admissible evidence presented at trial, that the defendants, J. Floyd Swilley, Laurel K. Swilley, and Heath Causey are in default. Furthermore, that the Plaintiff at the time the events took place which evolved into this lawsuit was a young and naïve

investor. The defendants were more business savvy and experienced. In fact, J. Floyd Swilley was a certified public accountant. This Court finds actual damages to be \$112,540 same being the original investment of \$115,000 has a small return on investment of \$2,460. Further, this Court applying the factors set out in Gamble v. Stevenson, 305 S.C. 104, 406 S.E.2d 350 (1991) hereby awards punitive damages in the amount of \$337,620. This Court is hereby awarding the Plaintiff actual damages of \$112,540 plus punitive damages in the amount of \$337,620 for a total damages awarded of \$450,160.

IT IS SO ORDERED

The Honorable William H. Seals, Jr.



Horry Common Pleas

Case Caption: Gabriel Barnhill , plaintiff, et al VS J Floyd Swilley , defendant, et al

Case Number: 2014CP2608367

Type: Order/Other

IT IS SO ORDERED

s/ The Honorable William H. Seals Jr. #2157

STATE OF SOUTH CAROLINA)

COUNTY OF HORRY)

Gabriel Barnhill and GSB Enterprises, LLC,)

Plaintiffs,)

vs.)

J. Floyd Swilley, J. Floyd Swilley)

Investment Advisors, Laurel K. Swilley,)

SMG Partners, LLC, SMS Services, LP,)

WCP Limited, LLC, 809 Holdings, LP,)

QC Financing, LLC, Heath Causey)

And Sage Financial Group, LLC,)

Defendants,)

Gabriel Barnhill and GSB Enterprises, LLC,)

)

Plaintiffs,)

vs.)

J. Floyd Swilley, J. Floyd Swilley)

SMG Partners, LLC, SMS Services, LP,)

WCP Limited, LLC, 809 Holdings, LP,)

Heath Causey, Sage Financial Group,)

LLC, Sage Advisory Group, L.P.,)

Sage Private Equity Group,)

Secured Asset Factoring Exchange, Inc.,)

SAFE, Inc., Digics, LLC, and Sage)

Funding, L.P.,)

Defendants.)

_____)

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT
CASE NO. 2014-CP-26-08367
(formerly 2013-CP-26-02816)

ORDER ADDRESSING RULE 59(e)
MOTIONS TO ALTER OR AMEND
THE ORDER FILED ON
NOVEMBER 6, 2024

CASE NO. 2014-CP-26-3362

The Court has carefully and deliberately studied the record including Plaintiffs' Gabriel Barnhill's ("Barnhill") and GSB Enterprises, LLC's ("GSB") Motion to Alter or Amend the Order of the Court dated November 6, 2024 ("Order") and Memorandum pursuant to Rule 59 (e), as well as the Defendants' Motion and Memorandum regarding the same. As discussed in detail below, the Court grants the Plaintiffs' Motion as to individualized or separate awards, with prejudgment and post-judgment interest, against the company and individual Defendants. The Court denies the Plaintiffs' request for relief under the Unfair Trade Practices Act and the Court denies the Defendants' Motion.

ANALYSIS

A. The Court Grants Plaintiffs' Motion for an award against the defaulted company Defendants, 809 and WCP Limited.

The September 12, 2024 damages hearing was based on the default of 809 Holdings, LP ("809"), WCP Limited, LLC ("WCP"), J. Floyd Swilley, Laurel K. Swilley, and Heath Causey. Although the Order does not mention or address 809 and WCP, they are in default and were subject to the damages motion and hearing. The Court hereby grants Plaintiffs' Motion as to those company Defendants and awards relief against those company Defendants as set forth below.

B. The Court Grants Plaintiffs' Motion for a separate award for each Plaintiff.

The Order does not award relief to each Plaintiff separately. Instead, the damages are combined (Barnhill damages of \$87,540 and GSB damages of \$25,000 are combined for a total of \$112,540). Similarly, the Order combines punitive damages of three (3) times actual damages for both Plaintiffs. The Court hereby grants Plaintiffs' Motion for an individualized award as specified below.

Under the common law causes of action of breach of fiduciary duty, fraud, negligence and conversion, a separate, individualized award is made as follows: (1) Barnhill damages of \$87,540 plus punitive damages of \$262,620, plus prejudgment interest and post-judgment interest as discussed below, and (2) GSB damages of \$25,000, plus punitive damages of \$75,000, plus prejudgment interest and post-judgment interest as discussed below. Heath Causey is not subject to the common law cause of action for breach of fiduciary duty or fraud.

The Court declines to award damages and statutory treble damages under the Unfair Trade Practices Act (“UTPA”) cause of action, S.C. Code Ann. § 39-5-140. However, the Court grants Plaintiffs’ Motion for relief under The Uniform Securities Act cause of action and awards damages of \$87,540 for Barnhill and damages of \$25,000 for GSB, along with interest in the amounts of \$91,917 and \$26,250 to Barnhill and GSB, respectively. The award for Barnhill as to the five Defendants under the Uniform Securities Act cause of action is: \$87,540, plus \$91,917 (interest), totaling \$179,457. The award for GSB as to the five Defendants under the Uniform Securities Act cause of action is \$25,000, plus \$26,250 (interest), totaling \$51,250.

C. Plaintiffs’ Motion is granted as to an award of prejudgment interest.

The Court hereby grants Plaintiffs’ Motion for an award of prejudgment interest. The three investment amounts and the singular payment to Gabriel Barnhill by 809 provides a mathematical certainty for Plaintiffs’ damages. See *Butler Contracting, Inc. v. Ct. St. LLC*, 369 S.C. 121, 133, 631 S.E.2d 252, 258-259 (2006) and *Beckman v. United Fire and Casualty*, 360 S.C. 127, 132, 600 S.E.2Ed 76 (Ct. App. 2004) (liquidated damages are those made certain by mathematical calculations from known factors). Interest is recoverable under the South Carolina Uniform Securities Act Cause of Action. Prejudgment interest in the amount

of \$91,917 and \$26,250 is hereby awarded to Barnhill and GSB, respectively. In addition, the Plaintiffs are entitled to post-judgment interest at the statutory post-judgment interest rate from the date of the Order, November 6, 2024.

D. The Order is amended.

The Order is hereby amended to include the following award:

On the common law causes of action, the Court hereby awards to Barnhill and against Heath Causey, Laurel K. Swilley, J. Floyd Swilley, WCP Limited, LLC and 809 Holdings, LP the following: damages of \$87,540, plus punitive damages of \$262,620, plus prejudgment interest of \$91,917 for a total judgment of \$442,077, which is subject to statutory post-judgment interest from November 6, 2024. Heath Causey is not subject to the breach of fiduciary duty or fraud cause of action award. The award for Barnhill under the Uniform Securities Act cause of action is \$179,457 (\$87,540 in damages, plus \$91,917 in interest).

On the common law causes of action, the Court hereby awards to GSB and against Heath Causey, Laurel K. Swilley, J. Floyd Swilley, WCP Limited, LLC and 809 Holdings, LP the following: damages of \$25,000, plus punitive damages of \$75,000, plus prejudgment interest of \$26,250, for a total judgment of \$126,250, which is subject to statutory post-judgment interest from November 6, 2024. Heath Causey is not subject to the breach of fiduciary duty or fraud cause of action award. The total award for GSB under the Uniform Securities Act cause of action is \$51,250, \$25,000 in damages plus \$26,250 of interest.

Because each Plaintiff is entitled to only one recovery, Barnhill is awarded judgment on the common law causes of action in the amount of \$442,077, with post-judgment interest from November 6, 2024, against Heath Causey, Laurel K. Swilley, J. Floyd Swilley, WCP Limited, LLC and 809 Holdings, LP, and GSB is awarded judgment on the common law causes of action in the amount of \$126,250, with post-judgment interest from November 6, 2024, against Heath Causey, Laurel K. Swilley, J. Floyd Swilley, WCP Limited, LLC and 809 Holdings, LP.

E. Defendants' Grounds for Reconsideration are Denied.

The Court denies the Defendants' Motion to Alter or Amend the Order. Based on the pleadings and the evidence, the Court's award for damages and punitive damages is clearly

supported. The Court's punitive damage award did not violate any analysis under *Gamble v. Stevenson*, 305 S.C. 104 (1991). In part, the reprehensibility of Defendants' conduct over a sustained period of time with other victims was more than sufficient to support an award of three times the actual damages.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT Plaintiffs' Motion to Alter or Amend is granted. Judgment in the amount of \$442,077 against Heath Causey, Laurel K. Swilley, J. Floyd Swilley, WCP Limited, LLC and 809 Holdings, LP is awarded to Gabriel S. Barnhill, with statutory post-judgment interest accruing from November 6, 2024. It is further ordered that judgment in the amount of \$126,250 against Heath Causey, Laurel K. Swilley, J. Floyd Swilley, WCP Limited, LLC and 809 Holdings, LP is awarded to GSB Enterprises, LLC, with statutory post-judgment interest accruing from November 6, 2024. And it is further ordered that Plaintiffs' Motion for relief under the UTPA is denied and Defendants' Motion to Alter or Amend is denied.

AND IT IS SO ORDERED.

The Honorable William H. Seals, Jr.



Horry Common Pleas

Case Caption: Gabriel Barnhill , plaintiff, et al VS J Floyd Swilley , defendant, et al

Case Number: 2014CP2608367

Type: Order/Amend

IT IS SO ORDERED

s/ The Honorable William H. Seals Jr. #2157

RECEIVED

Oct 15 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
WILLIAM H. SEALS, JR., CIRCUIT COURT JUDGE

Appellate Case No. 2025-000796

Gabriel Barnhill and GSB Enterprises, LLC, Respondents,

v.

J. Floyd Swilley, J. Floyd Swilley Investment Advisors,
Laurel K. Swilley, SMG Partners, LLC, SMS Services, LP,
WCP Limited, LLC, 809 Holdings, LP, QC Financing, LLC
Heath Causey and Sage Financial Group, LLC, Defendants,

of which J. Floyd Swilley, Laurel Swilley and
Heath Causey are the Appellants.

PROOF OF SERVICE

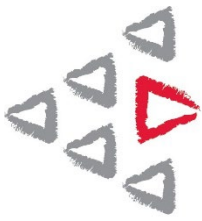
I, Beth Cogan, an employee with Ballard & Watson, do hereby certify that on October 15, 2025, I served a copy of the **Motion for Leave to file Amended Notice of Appeal**, in the above-captioned case on the following individuals by electronic mail using their email address listed in the Attorney Information System, addressed as follows:

Nate Fata, Esquire
NATE FATA, P.A.
nfata@fatalaw.com



Beth Cogan, Paralegal

October 15, 2025



Ballard & Watson
Attorneys at Law
PERSISTENT. UNWAVERING.

Desa Ballard
Harvey M Watson III
Haley Hubbard

226 State Street West Columbia, SC 29169
ph 803.796.9299 | fx 803.796.1066 | desaballard.com

October 15, 2025

Via Email (ctappfilings@sccourts.org)
The Honorable Jenny Abbot Kitchings
Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, South Carolina 29211

Re: *Gabriel Barnhill, et al. v. J. Floyd Swilley, et al.*
Case No.: 2025-000796

Dear Ms. Kitchings:

Enclosed for filing, please find a Motion for Leave to file Amended Notice of Appeal and Proof of Service for the above-referenced matter. Pursuant to paragraph (3)(c) of the Supreme Court's amended administrative order dated May 6, 2022 ("Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules" originally dated August 25, 2021) a check for the filing fee is being forwarded separately via US mail.

By copy of this letter and as evidenced by the Proof of Service, this filing has been served upon counsel for the Respondent. If you have any questions, please do not hesitate to contact our office. With warm personal regards, I am,

Sincerely yours,

Harvey M. Watson III
harvey@desaballard.com

Enclosures

cc: Via Email
Nate Fata, Esquire
Floyd Swilley
Laurel Swilley, Esquire
Heath Causey