

July 22nd , 2026

The South Carolina Court Of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED

Jul 22 2026

SC Court of Appeals

Ref: Perez v Edgefield Community Healthcare, LLC
Case Number 2026-001556
Letter of Deficiency dated July 15th, 2026

Dear Clerk of Court:

This is an addendum to the July 15th, 2026 response.

The following incident clearly demonstrate the reason Ms Perez desperately needs her First Amendment Right to file grievances which is intertwined with her 2nd and 5th Amendments rights to life, to defend the same using an assistive device, i.e, a GrannyCam .

On July 9th, 2026 Ms Perez was assaulted , her face pummeled . Imaging at the emergency room showed several of her ribs , sternum and Left knee fractured.

In order to prevent the Edgefield Police from investigating the crime , the **Emergency Medical Systems (EMS) WERE NOT ACTIVATED by the Defendant. .**

EMS was activated by Ms Perez' son - Jose A. Perez - on July 10th, 2026 when he called 911 to report her injuries . Subsequently, Edgefield Police issued Incident Report EPD260FF000249(01) by police sergeant G. A. Schultz who referred the matter to the South Carolina Attorney General.

As a US Citizen Ms Perez has the Constitutional right to seek a redress of her grievances , the right to be heard and to marshal evidence in support thereof¹. A hearing is functionally useless if a nursing home resident is prohibited from or denied the ability to collect evidence to support her claim and/or defend herself. ² .

Ms Elvira Perez also has a right to life and to defend the same using an assistive device³ , which is guaranteed by, inter alia, the Second and Fifth Amendments⁴ as well as the Privileges and Immunities Clause ⁵..

The nursing home retaliated by seeking to **involuntarily transfer her out of the nursing home** and trespassing her son and power of attorney.

WHEREFORE, I respectfully submit that I ought to be allowed to represent my mother in this cause of action .

¹ Goldberg v Kelly, 397 US 254 (1970) , *Grannis v. Ordean*, [234 U. S. 385](#) (1914),

² [Opportunity for Meaningful Hearing | U.S. Constitution Annotated | US Law | LII / Legal Information Institute](#)

³ District of Columbia v Heller, 554 US 570 (2008) citing William Blackstone1 Blackstone 136, 139–140 (1765). cited the arms provision of the Bill of Rights as one of the fundamental rights of Englishmen. See 1 Blackstone 136, 139–140 (1765). It was, he said, “the natural right of resistance and self-preservation,” *id.*, at 139, and “the right of having and using arms for self-preservation and defence,” *id.*, at 140; see also 3 *id.*, at 2–4 (1768). Other contemporary authorities concurred. See G. Sharp, Tracts, Concerning the Ancient and Only True Legal Means of National Defence, by a Free Militia 17–18, 27 (3d ed. 1782); 2 J. de Lolme, The Rise and Progress of the English Constitution 886–887 (1784) (A. Stephens ed. 1838); W. Blizard, Desultory Reflections on Police 59–60 (1785)..

⁴ Abigail Alliance v Von Eschenbach, 445 F. 3d 470, 484 (DC Cir-2006) citing Cruzan v Director, Missouri Department of Health , 497 US 261 (1990)

⁵ Corfield v Coryell, 6 F Cas 546 , 551-552 (3rd Cir-- 1823) citing U.S. CONST. art. IV, § 2, cl. 1

Respectfully Submitted ,

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