

**In the SUPREME COURT
of the STATE OF SOUTH CAROLINA**

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AUG 17 2026

S.C. SUPREME COURT

A.C. Benson, Essa Almasoud, Megan Wilson)

case no: 2026-001384

Living Sui Juris propria persona)

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Plaintiffs)

vs.)

Clover School District Board et al., and indv.)

Civil Lawsuit

Sheila Quinn, Mary Gerber, Paige Howe,)

Jury Trial

Lori Maczko, Elaine Miles, SCDOE through)

Ellen Weaver and Indv. Tina Ross, Barbara)

Drayton; Brian Murphy; York County)

Sheriff's Office through/indv Anthony)

Breeden, Brandon McCoy, Andy Boone,)

And Andrew Galant)

Defendants)

***** Amended 8/11/2026*****

I. PARTIES AND PURPOSE: COMES NOW, PLAINTIFFS A.C. Benson at 235

Straightaway Lane, Indian Land, 29707, 'Lancaster County', and Essa Almasoud, 227

Lodges Ln Apt. 307, Clover, SC 29710, and Megan Wilson 227 Lodges Ln. Apt. 308, in

'York County', files this civil action brought under:

- A. SC Code §15- 14 Defamation
- B. SC Code §15- 10 Breach of Contract by Fraudulent Act
- C. SC Code §15- 12 Civil Conspiracy to Deprive Rights
- D. SC Code §15- 13 Damages
- E. SC Code §15- 17 Fiduciary Duty
- F. SC Code §15- 18 Fraud

G. SC Code §15- 20, 21, 22, 23 General, comparative and Gross Negligence, recklessness, willfulness

H. SC Code §15- 24 Intentional infliction of Emotional Distress

(all conveniently missing under the SC legislature website) **EXHIBIT B**

I. SC Constitution Article 1 SECTION 3. Privileges and immunities; due process; equal protection of laws.

J. Article 1 SECTION 8. Separation of powers. In the government of this State, the legislative, executive, and judicial powers of the government shall be forever separate and distinct from each other, and no person or persons exercising the functions of one of said departments shall assume or discharge the duties of any other. (1970 (56) 2684; 1971 (57) 315.)

K. Article 1 SECTION 16. Libel. In all indictments or prosecutions for libel, the truth of the alleged libel may be given in evidence, and the jury shall be the judges of the law and facts. (1970 (56) 2684; 1971 (57) 315.)

L. Article 1 SECTION 22. Procedure before administrative agencies; judicial review. No person shall be finally bound by a judicial or quasi-judicial decision of an administrative agency affecting private rights except on due notice and an opportunity to be heard; (1970 (56) 2684; 1971 (57) 315.)

M. SECTION 23. Provisions of Constitution mandatory. The provisions of the Constitution shall be taken, deemed, and construed to be mandatory and prohibitory, and not merely directory, except where expressly made directory or permissive by its own terms. (1970 (56) 2684; 1971 (57) 315.)

II. AGAINST DEFENDANTS

A. Clover School District through Sheila Quinn

604 Bethel Street

Clover, SC 29710

And Individually;

B. Mike Ballard, mike.ballard@clover.k12.sc.us

C. Matt Burris, Matt.Burris@clover.k12.sc.us

D. Jessica Cody, Jessica.Cody@clover.k12.sc.us

E. Kenda Cook, kenda.cook@clover.k12.sc.us

F. Keron Meeks, Keron.Meeks@clover.k12.sc.us

G. Tracy Stiff, tracy.stiff@clover.k12.sc.us

H. Rob Wallace, Rob.Wallace@clover.k12.sc.us

I. Sheila Quinn, sheila.quinn@clover.k12.sc.us

J. Lori Mazcko, Lori.Maczko@clover.k12.sc.us

K. Elaine Miles, Elaine.miles@clover.k12.sc.us

L. Mary Gerber, Mary.gerber@clover.k12.sc.us

M. Paige Howe

110 Linden st

Clover, SC 29710

N. Office of York County Sheriff's through Anthony Breeden

Moss Justice Center

1675-2A York Highway

York, SC 29745

And Individually at same address above;

O. Anthony Breeden

P. Brandon McCoy

Q. Andy Boone

R. Andrew Galant

S. South Carolina Department of Education through Ellen Weaver

849 Learning Lane

West Columbia, SC 29172

and Individually,

T. General Counsel - Barbara Drayton-BDrayton@ed.sc.gov

U. Tina Ross- specialeducationservicesdr@ed.sc.gov **and** tross@ed.sc.gov

V. Murphy Stephenson Law

Brian Murphy Esq.

207 Whitsett St

Greenville, SC 29601

III. JURISDICTION AND VENUE

This Petition invokes the original jurisdiction of the South Carolina Supreme Court pursuant to Article V, Section 5 of the South Carolina Constitution and applicable provisions of South Carolina law authorizing the Court to issue writs of mandamus, prohibition, quo warranto, certiorari, injunction, and other remedial and original writs.

This matter presents issues of substantial public importance affecting the rights of the Plaintiffs and the proper administration of government within the State of South Carolina. The issues presented involve constitutional questions, governmental actions, and/or duties of public officials that require prompt and authoritative resolution by the highest court of this State, as the data indicates are happening systemically. These departments and agencies are “investigating” themselves, There is no clear indication or public access to how, when and if some or any of the administrative record was transferred to the Judicial Courts. Ex parte communication exists among all defendants, appalling unprofessional conduct was documented by Mr Murphy, the administrative officer, who is contracted by the district who is the defendants and respondents to the alleged violations.

Plaintiffs lack an adequate or impartial remedy and no other judicial or administrative forum can provide complete, timely, and effective relief under the circumstances presented herein. The challenged acts and omissions arise from actions taken within the State of South Carolina by governmental entities, public officials, agencies, or instrumentalities subject to the jurisdiction of this Court including but not limited to the Office of the Sheriff and the South Carolina Department of Education.

South Carolina's Supreme Court has said §22 protects notice, an opportunity to be heard, impartial adjudication, and judicial review. In *Garris v. Governing Board*, the court actually found an Article I §22 violation where the same persons functioned as prosecutors and adjudicators. The court has also said §22 protects these rights even when the matter does **not** qualify as a contested case under the Administrative Procedures Act.

Immediate exercise of this Court's original jurisdiction is necessary to prevent continuing harm to the plaintiffs and all South Carolinians to protect constitutional rights, preserve the orderly execution of justice, and provide guidance on matters of statewide SYSTEMIC concern. Accordingly, jurisdiction is proper before this Court pursuant to its constitutional and statutory authority to hear original actions and grant extraordinary relief.

Venue is proper in the South Carolina Supreme Court because this action seeks relief within the Court's original jurisdiction concerning matters arising within the State of South Carolina and involving questions of statewide significance.

IV. PUBLIC NOTICE

Plaintiffs Here and Now, provide Public Notice to the defendants. This is in accordance with USCS rules of civil procedure, as well as Rule 17 and Rule 20 of the United States Supreme Court. The Constitution for the United States is the overarching requirement that every state must follow. States are not able to enact their own alternative legislation and substitute that for the guarantees of the Constitution. That would mean that your state laws would be more powerful than the Constitution, and that is simply unlawful.

Unfortunately, the state of South Carolina has enacted laws in its inferior constitution that permits the public officials that you will pay to violate the constitution. An emolument violation is when you pay public officials to commit a crime. There are two areas of the Constitution that reinforce this.

The first is Article One, Section 10, and that's where it says that no state shall create any law that shall impair the obligation of a contract. So, a contract is your police officers, your prosecutors, your judges, your sheriff's department. They are all under a contract, that's a contract you perform based on the oath or affirmation that they took to support and defend the Constitution of the United States of America.

When a state enacts a law and directs their agents to disobey the supreme law of the land, that would be a violation of Article One, Section 10. The second area that reinforces the emolument violation is the 14th Amendment, and that's where it says that no state shall create or enforce any law that shall abridge the privileges or immunities of United States citizens.

Privileges and immunities of United States citizens are at a minimum those that are enumerated within the Bill of Rights and the First 10 Amendments. These are not able to be impaired.

If your sheriff's **OFFICE**, (NOT department) is choosing to execute a duty from a NON-SUPERIOR (School District Admin.), a superior, or even a JUDGE, by relying upon a nuclear policy, mandate or statute that deprives their rights, including but not limited to constitutional due process, **that officer is committing crime.**

Under Title 18 USC subsection 242 which is deprivation of rights under code law. What that statute says, that any person who would be of color of any state statute, ordinance, custom, or regulation deprives the person of any rights to secure that constitution commits that crime.

The second is title 18 USC subsection 241 which is conspiracy deprived rights. What that says, is when two or more persons conspire for the purpose of depriving any person of any rights to secure that constitution commits that crime?

The laws of criminal conspiracy for public officials, states that any person who, having knowledge of any of the wrongs conspired to be done, and who have the power to prevent or aid in the prevention of commission of the same, neglects or refuses to do so, may be joined to spend the action. So, upon having been provided this notice, letting you know that you guys are paying for agents to go out and abridge their constitutional obligations. Should the defendants continue to cloud and conspire to deprive rights, the alternative is they'll have to convert these accusations into federal affidavits under section 1983.

Last but not least, The United States Circuit Court identifies what an abuse of discretion is, and they say that there's a two-part test. The second part of that test is any erroneous view of the law is an automatic abuse of discretion. An erroneous view of the law would be your legal contemplation that the lowest form of law, a judge-made ruling "CASELAW", is superior to the Constitution for United States America. That would be an obvious erroneous view of law. Please **CEASE AND DESIST** to continue to commit these crimes.

V. STATEMENT OF FACTS

1. Plaintiffs are all Civil and SPED Rights Advocates for G.S. protected under the American with Disabilities Act and The rehabilitation Act of 1973 Section 504.
2. Plaintiffs reserve All Rights and Authority under Natural Law.
3. Plaintiff Almasaud is the Father of G.S

4. G.S a current 1st grade student at Oakridge elementary school in Clover school district.
5. On February 24, 2026 Plaintiffs wrote a letter to inform the district she had been hired by the Father because there were many concerns.
6. Starting from that date until present day the defendants participated in the claims mentioned hereto. Please see a detailed **Notarized JOINT affidavit of the three Plaintiffs** filed with the court under this Civil Action as **EXHIBIT A**, which includes 12 separate appendixes.

VI. STATEMENT OF CLAIMS

ACTION 1 – DEFAMATION SC Code §15- 14 : Plaintiff Benson

Defendant Gerber and Defendant Murphy made false statements concerning Plaintiff Benson. Specifically, refer to the Affidavit filed with this court. Defendants communicated these statements to one or more third parties, including other defendants and staff and public record. The statements were false. Defendant knew the statements were false, and acted with reckless disregard for their truth or falsity, or negligently and manipulatively presented as factual assertions rather than opinion. The statements tended to expose Plaintiff to public hatred, contempt, ridicule, or disgrace, and/or injured Plaintiff in Plaintiff's profession, business, trade, or personal reputation.

As a direct and proximate result of Defendant's conduct, Plaintiff has suffered damages, including but not limited to:

- Injury to reputation;
- Emotional distress and mental anguish;

- Loss of business opportunities, employment opportunities, clients, or income;
- Costs incurred to mitigate the damage caused by Defendant's statements; and
- Other damages to be proven at trial.

Plaintiffs fully set forth herein that those Defendants published false statements concerning Plaintiff to other parties and people. The statements were defamatory in nature. Defendants acted negligently, recklessly, and/or with actual malice in making and publishing the statements. Plaintiff suffered damages as a direct and proximate result of Defendant's defamatory conduct.

ACTION 2: FRAUDULENT ACT ACCOMPANYING THE BREACH

SC Code §15- 10, All Plaintiffs.

Beginning on or about February 5th, 2026, Plaintiffs and Oathed Defendants, at a minimum, School Board Members, Office of Sheriff, and State Superintendent entered into a valid and enforceable contract. It is the Oath they pledged to obtain their Office to SERVE South Carolinians.

The terms of the Defendants and Plaintiffs Contract are listed in their Oath of Office, with "The PEOPLE".

It is at this time under **SC 8-3-30 we request a copy of the oath of office along with the security bond each of them must legally hold to enforce compliance of that oath.**

Defendant materially breached the contract by not honoring their Oath of Office and caused Plaintiff to suffer damages, including but not limited to: Financial losses; Loss of

expected contractual benefits; Costs incurred as a result of the breach; and Other damages to be proven at trial.

In connection with and accompanying the breach of contract, Defendant committed fraudulent acts, including but not limited to: Defendant knowingly made false representations documents and emails, concealed material facts, altered records, forged documents, intentionally misdirected funds, or otherwise engaged in deceptive conduct related to the contractual relationship.

Defendant's fraudulent conduct was intentional, dishonest, and undertaken for the purpose of depriving Plaintiff of contractual rights and benefits. Defendant's fraudulent acts were separate from and in addition to the mere failure to perform contractual obligations. Plaintiffs reasonably relied upon Defendant's representations and conduct. As a direct and proximate result of Defendant's fraudulent acts and breach of contract, Plaintiff suffered actual damages.

BREACH OF CONTRACT

Plaintiff incorporates the preceding paragraphs as if fully restated herein. Defendant materially breached the contract. Plaintiff suffered damages as a direct and proximate result of Defendant's breach.

BOC Accompanied by a Fraudulent Act

Plaintiff incorporates the preceding as if fully restated herein. Defendant breached the contract. Defendant committed one or more fraudulent acts accompanying the breach. Defendant's fraudulent acts were characterized by dishonesty, unfair dealing, deception, bad

faith, concealment, misrepresentation, or other fraudulent conduct. Defendant acted willfully, knowingly, intentionally, and with reckless disregard for Plaintiff's rights. As a direct and proximate result of Defendant's conduct, Plaintiff suffered actual damages. Defendant's conduct was willful, wanton, and fraudulent, warranting the imposition of punitive damages under South Carolina law.

ACTION 3: CIVIL CONSPIRACY

SC Code §15- 12, All Plaintiffs.

Beginning on or about February 1st, 2026, Defendants colluded and conspired together, understanding, in combination, and/or common design to commit unlawful acts and/or lawful acts by unlawful means against Plaintiffs. This in order to;

1. Injure Plaintiffs ability to create inaccurate records of the district's failure to provide appropriate education and safety to G.S.
2. Damage Plaintiff's Ability to Participate lawfully with G.S educational and safety decisions
3. Interfere with Plaintiff's contractual, property, employment, educational, or civil rights;
4. Retaliate against Plaintiff; and/or
5. Obtain an improper benefit at Plaintiff's expense.
6. In furtherance of the conspiracy, Defendants committed documented overt acts, that can be confirmed with Audit Logs and Meta Data in discovery.
7. Defendants knowingly participated in the conspiracy and acted in furtherance of its unlawful objectives.

8. Defendants' actions were intentional, willful, malicious, and undertaken with knowledge that Plaintiff would be harmed.
9. As a direct and proximate result of Defendants' conduct, Plaintiff suffered damages, including but not limited to:
 - a. Financial losses; Loss of business, employment, educational, or contractual opportunities;
 - b. Damage to reputation;
 - c. Emotional distress and mental anguish;
 - d. Costs incurred in responding to Defendants' actions; and
 - e. Other damages to be proven at trial.

Plaintiff incorporates as if fully set forth herein that Defendants combined, associated, agreed, and acted together for the purpose of harming Plaintiff and/or depriving Plaintiff of legal rights. Defendants engaged in overt acts in furtherance of the conspiracy. The acts undertaken by Defendants were unlawful and/or accomplished through unlawful means.

Defendants acted with malice, bad faith, and conscious disregard for Plaintiff's rights. As a direct and proximate result of the conspiracy, Plaintiff sustained special damages separate and distinct from damages arising from any other cause of action. Plaintiff is entitled to recover actual damages, consequential damages, and all other damages permitted by law.

Defendants' conduct was willful, wanton, malicious, and reckless, entitling Plaintiff to punitive, special damages and other damages. These damages are separate and distinct from damages asserted under any other cause of action contained in this Complaint.

Plaintiffs incorporate by reference all preceding fully set forth herein. At all times relevant hereto, a fiduciary relationship existed between Plaintiffs and Defendants.

The fiduciary relationship arose from: Government officer, director and shareholder; and Other fiduciary relationship and by virtue of that relationship, Defendant owed Plaintiff duties of loyalty, honesty, good faith, fair dealing, full disclosure, due care, and the obligation to act in Plaintiff's best interests. Plaintiff placed trust and confidence in Defendants regarding their Civil Rights and the Education, care and safety of G.S.

ACTION 4: BREACH OF FIDUCIARY DUTY

SC Code §15- 17, All Plaintiffs.

Defendant breached fiduciary duties owed to Plaintiff by engaging in the following acts:

- Self-dealing;
- Concealing material information;
- Misappropriating funds, assets, or opportunities;
- Acting under a conflict of interest;
- Making decisions for Defendant's personal and or financial benefit and to cover up crimes and violations and unlawful acts at Plaintiff's expense;
- Failing to disclose material facts;
- Diverting assets, opportunities, or resources;

All Defendants knowingly placed District interests above those of Plaintiff rights.

Defendants failed to exercise the degree of loyalty, honesty, and care required by the fiduciary relationship. Defendant's conduct constituted a breach of fiduciary duty under the laws of South

Carolina. Defendants' conduct was willful, wanton, malicious, and reckless, entitling Plaintiff to punitive, special damages and other damages. These damages are separate and distinct from damages asserted under any other cause of action contained in this Complaint.

ACTION 5: WILLFUL, WANTON, AND RECKLESS CONDUCT

Defendant's conduct was intentional, willful, wanton, reckless, and in conscious disregard of Plaintiff's rights. Defendant knowingly abused the position of trust and confidence entrusted to Defendant. Plaintiff is therefore entitled to recover punitive damages as permitted under South Carolina law.

Defendants' conduct was willful, wanton, malicious, and reckless, entitling Plaintiff to punitive, special damages and other damages. These damages are separate and distinct from damages asserted under any other cause of action contained in this Complaint.

ACTION 6 : FRAUD

SC Code §15- 18, All Plaintiffs.

Defendants committed fraud against the Plaintiffs and represented these statements and documents as true and accurate. At the time the representations were made, Defendant knew they were false, misleading, incomplete, or made them with reckless disregard for their truth or falsity. Defendant intended that Plaintiff rely upon these representations for G.S education and safety. Defendant committed the Fraud for the purpose of obtaining, avoiding an obligation, hiding illegal acts, create a false record, inducing Plaintiff to act, or otherwise advancing Defendant's interests.

Plaintiff reasonably believed and relied upon Defendants to create accurate records and act in good faith and not in unethical, unprofessional, malicious manor.

Defendants created false records, failed to disclose material facts that Defendant had a duty to disclose, including: Defendant intentionally concealed or omitted material information that would have affected the outcome.

Plaintiff fully set forth herein that the Defendant committed fraud by continuously creating false documentation, verbally repeating an alternate reality opposing the evidence and facts of the matter, and omission of concerning material facts. Defendant knew the statements and documents were false or acted with reckless disregard for their truth. Defendant intended that Plaintiff rely upon the documents. Plaintiff suffered damages as a direct and proximate result of Defendant's fraudulent conduct. Defendant's actions were intentional, willful, malicious, and undertaken with the intent to deceive Plaintiff.

Defendants unjustly benefited from the fraudulent conduct by creating problem reaction solution scenarios for District Attorney profit as a means to funnel, embezzle and launder IDEA to themselves through various other business and shell corporations and contracts. The SCDOE administrative complaint processes are not impartial, rarely reflect the record, and thus unconstitutional.

Additionally in the State of South Carolina there are only 2 law firms representing every single district in the state for the last 40 years. This in addition to SCDOE lead counsel Barbara Drayton being at her position for 40 years risks proper checks and balances and contributes to a massive conflict of interest; a violation of RULE 1 of the Civil law of procedure. Additionally, the Hearing officer, Brian Murphy is the only one performing them with the same 2 firms, week

after week, year after year, and all a part of a private association, SC BAR, with their own interests at precedent, not impartial justice.

Defendant's conduct was willful, wanton, and in reckless disregard of Plaintiff's rights, entitling Plaintiff to punitive damages.

ACTION 7; NEGLIGENCE; GENERAL, GROSS, RECKLESS AND WILFUL.

SC Code §15- 20, 21, 22, 23, All Plaintiffs.

Plaintiff incorporates all preceding paragraphs as if fully set forth herein. At all relevant times, Defendant owed Plaintiff a duty to exercise reasonable care. Defendant knew or should have known that failure to exercise reasonable care would create an unreasonable risk of harm to Plaintiff. Defendant breached its duty by acts and omissions. As a direct and proximate result of Defendant's conduct, Plaintiffs suffered damages including:

- Economic loss;
- Property damage;
- Loss of income;
- Emotional distress;
- Reputational harm;
- Litigation expenses; and
- Other damages to be proven at trial.

Defendant owed Plaintiff a legal duty of care. Defendant breached that duty by failing to exercise reasonable care under the circumstances. Defendant's breach was the direct and proximate cause of Plaintiff's injuries and damages. Plaintiff suffered actual damages as a result.

ACTION 8: GROSS NEGLIGENCE

Defendant's conduct constituted more than ordinary negligence. Defendants failed to exercise even slight care under circumstances presenting an obvious risk of harm to the Plaintiffs and G.S. Defendants knew or should have known that its conduct created a substantial probability of injury. Defendant's conduct constituted gross negligence under South Carolina law. As a direct and proximate result, Plaintiffs sustained damages.

ACTION 9: RECKLESSNESS

Defendants consciously disregarded a known and substantial risk to Plaintiffs and G.S. Defendant acted with reckless indifference to Plaintiff's rights, safety, property, and legally protected interests. Defendant's conduct was a direct and proximate cause of Plaintiff's damages.

ACTION 10: WILLFUL AND WANTON MISCONDUCT

Plaintiff incorporates all prior that Defendant knowingly engaged in conduct likely to cause harm to Plaintiff. Defendant acted intentionally, willfully, and with conscious disregard for the consequences of its actions. Defendant's conduct demonstrated a deliberate indifference to Plaintiff's rights and welfare. Defendant's willful and wanton misconduct directly and proximately caused Plaintiff's damages.

Plaintiff incorporates all prior allegations of Defendant's conduct was willful, wanton, reckless, and in conscious disregard of Plaintiff's rights. Defendant knew or should have known that its conduct would likely result in injury or damage. Defendant's conduct warrants the imposition of punitive damages sufficient to punish Defendants and deter similar misconduct.

ACTION 11: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

SC Code §15- 24, All Plaintiffs

Plaintiff incorporates all preceding pages fully set forth herein that beginning at the same time and continuing thereafter, Defendants engaged in a pattern of conduct directed toward Plaintiffs that included, but was not limited to:

1. Psychological manipulation
2. Gaslighting
3. Stonewalling
4. Deflecting and repeating
5. Making verbal statements and written documentation in direct contradiction to the reality. (Recorded)
6. Depriving constitutional rights such as freedom of speech, religious speech, advocacy, and entry into public property without lawful just cause.

Defendants intentionally engaged in the conduct described above, or acted with reckless disregard of the probability that Plaintiffs would suffer severe emotional distress.

Defendant knew, or reasonably should have known, that such conduct would likely cause severe emotional and psychological harm to Plaintiffs.

EXTREME AND OUTRAGEOUS CONDUCT

Defendant's actions were extreme, outrageous, intolerable, and beyond all possible bounds of decency accepted by a civilized society. Defendant's conduct exceeded mere insults, indignities, annoyances, disagreements, or ordinary negligence. Defendants abused a position of

authority, trust, influence, or power and intentionally targeted the Plaintiffs. Defendant's actions were malicious, oppressive, humiliating, retaliatory, and intended to cause emotional harm.

CAUSATION AND INJURY

Plaintiff's emotional distress was severe and of such intensity that no reasonable person could be expected to endure it. As a direct and proximate result of Defendant's conduct, Plaintiffs suffered severe distress including but not limited to;

- Extreme anxiety;
- Severe emotional anguish;
- Fear and humiliation;
- Depression;
- Loss of sleep;
- Physical manifestations of emotional distress;
- Mental suffering; and
- Other injuries to be proven at trial.

ACTION 12: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AND OUTRAGE

Plaintiffs set forth herein that the Defendants intentionally or recklessly engaged in extreme and outrageous conduct toward Plaintiff. Defendant knew, or should have known, that severe emotional distress was substantially certain to result. Defendant's conduct was beyond all possible bounds of decency and utterly intolerable in a civilized community.

Defendant's conduct directly and proximately caused Plaintiff's severe emotional distress and suffered substantial damages as a result.

Plaintiff incorporates all preceding allegations. Defendant's conduct was intentional, malicious, reckless, willful, wanton, and in conscious disregard of Plaintiff's rights. Defendant's conduct warrants the imposition of punitive damages to punish Defendant and deter similar conduct. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered:

- Severe emotional distress;
- Mental anguish;
- Psychological injury;
- Loss of enjoyment of life;
- Economic losses related to treatment and recovery;
- Consequential damages; and
- Other damages to be shown during trial.

SOUTH CAROLINA CONSTITUTIONAL VIOLATIONS

Plaintiffs incorporate by reference all preceding allegations of this Complaint as though fully set forth herein.

At all times relevant to this action, the governmental Defendants were acting under authority granted by the State of South Carolina, through their respective public offices, agencies, boards, departments, and/or governmental positions.

Plaintiffs allege that the governmental and administrative acts described throughout this Complaint deprived Plaintiffs of rights secured by the Constitution of the State of South Carolina.

ACTION 13 — DEPRIVATION OF DUE PROCESS AND EQUAL PROTECTION

S.C. CONST. ART. I, § 3, All plaintiffs.

Article I, Section 3 of the South Carolina Constitution provides that the privileges and immunities of citizens of South Carolina and the United States shall not be abridged; that no person shall be deprived of life, liberty, or property without due process of law; and that no person shall be denied equal protection of the laws.

Plaintiffs incorporate all preceding allegations. Plaintiffs possessed constitutionally protected interests affected by Defendants' governmental actions, including rights and interests concerning participation in governmental and administrative proceedings, education-related decision-making concerning G.S., access to governmental processes, reputation where connected to protected interests, and other liberty and property interests established by law and described elsewhere in this Complaint.

Plaintiffs allege that Defendants deprived and/or attempted to deprive Plaintiffs of protected interests without constitutionally adequate process by, among other things:

creating, maintaining, relying upon, and/or disseminating materially inaccurate governmental records;

1. disregarding material evidence submitted by Plaintiffs;
2. denying Plaintiffs a meaningful opportunity to challenge materially inaccurate statements and records;
3. making or participating in governmental decisions before Plaintiffs received a meaningful opportunity to be heard;

4. applying governmental procedures inconsistently, arbitrarily, or in a manner different from similarly situated persons without a constitutionally sufficient basis;
5. interfering with Plaintiffs' meaningful participation in administrative processes affecting protected rights and interests;
6. taking governmental action based upon information Defendants knew, or allegedly had reason to know, was materially inaccurate; and
7. engaging in the additional acts and omissions specifically alleged throughout this Complaint.

Plaintiffs further allege that the governmental actions complained of were arbitrary and capricious and deprived Plaintiffs of meaningful procedural protections guaranteed by Article I, Section 3.

To the extent discovery establishes that similarly situated persons were treated differently under materially similar circumstances, Plaintiffs further allege that Defendants denied Plaintiffs equal protection of the laws through intentional and unjustified disparate treatment.

Defendants' acts and omissions directly and proximately caused injury to Plaintiffs and deprived Plaintiffs of rights protected by Article I, Section 3 of the South Carolina Constitution.

ACTION 14 — VIOLATION OF SEPARATION OF POWERS

S.C. CONST. ART. I, § 8, All plaintiffs

Plaintiffs incorporate all preceding allegations. Article I, Section 8 of the South Carolina Constitution mandates that the legislative, executive, and judicial powers of South Carolina

remain separate and distinct and prohibits persons exercising the functions of one department from assuming or discharging the duties of another.

Plaintiffs allege that discovery and the evidentiary record will establish that governmental actors acted outside the lawful boundaries of the authority assigned to their respective offices and assumed, exercised, influenced, or interfered with governmental functions not lawfully committed to them.

Plaintiffs specifically allege that the challenged administrative structure and conduct permitted executive and/or administrative actors to exercise functions in a manner inconsistent with the constitutional separation of governmental powers and the statutory procedures enacted by the General Assembly.

Plaintiffs further allege that governmental officials cannot enlarge their own authority beyond that granted by the Constitution and laws of South Carolina through administrative practice, custom, policy, agreement, or convenience.

Plaintiffs request a declaration identifying any challenged governmental acts found to violate Article I, Section 8 and appropriate prospective, injunctive, or other relief authorized by law.

ACTION 15 — PROCEDURAL RIGHTS BEFORE ADMINISTRATIVE AGENCIES

S.C. CONST. ART. I, § 22, All Plaintiffs.

Plaintiffs incorporate all preceding allegations.

Article I, Section 22 of the South Carolina Constitution provides constitutional protections to persons affected by judicial or quasi-judicial decisions of administrative agencies, including due notice, an opportunity to be heard, separation between prosecution and adjudication, procedures prescribed by the General Assembly where liberty or property is implicated, and judicial review.

Plaintiffs allege that the SCDOE and/or other governmental Defendants exercised administrative, judicial, or 'quasi-judicial' governmental authority, which does not exist in either the US or SC constitution, in fact it invokes the opposite, affecting Plaintiffs' private rights. Plaintiffs further allege that the administrative processes at issue failed to provide constitutionally adequate procedural protections.

Specifically, Plaintiffs allege, as applicable to each Defendant and proceeding, that Defendants:

1. failed to provide meaningful notice of material issues, evidence, allegations, decisions, and/or procedures;
2. failed to provide Plaintiffs a meaningful opportunity to be heard and to present relevant evidence;
3. failed to meaningfully consider evidence submitted by Plaintiffs;
4. relied upon materially inaccurate, incomplete, altered, misleading, and/or disputed records without providing an adequate mechanism for Plaintiffs to challenge those records;
5. predetermined or effectively predetermined material issues before completion of the administrative process;

6. permitted persons involved in investigation, advocacy, prosecution, or development of the allegations to participate improperly in adjudicative functions;
7. failed to maintain sufficient impartiality between adversarial and adjudicative functions;
8. failed to follow procedures prescribed by the General Assembly and/or governing law;
9. impaired Plaintiffs' ability to obtain meaningful judicial review by creating or maintaining an administrative record that Plaintiffs allege was materially incomplete or inaccurate; and
10. otherwise deprived Plaintiffs of the procedural protections guaranteed by Article I, Section 22.

Plaintiffs allege that these were not merely disagreements with the outcome of administrative proceedings. Rather, Plaintiffs challenge the constitutionality and fundamental fairness of the procedures through which those outcomes were reached.

Plaintiffs allege that the cumulative structure and conduct of the proceedings deprived Plaintiffs of a meaningful and impartial administrative process and prejudiced Plaintiffs' protected rights.

Plaintiffs therefore request judicial review and all declaratory, injunctive, equitable, and other relief authorized by law to remedy violations of Article I, Section 22.

ACTION 16 — MANDATORY AND PROHIBITORY EFFECT OF THE SOUTH CAROLINA CONSTITUTION

S.C. CONST. ART. I, § 23, All plaintiffs

Plaintiffs incorporate all preceding allegations.

Article I, Section 23 of the South Carolina Constitution provides that provisions of the Constitution shall be taken, deemed, and construed as mandatory and prohibitory, and not merely directory, except where expressly made directory or permissive.

Plaintiffs allege that the constitutional protections invoked in this Complaint therefore constitute mandatory limitations upon the exercise of governmental authority and cannot be disregarded merely as administrative preferences, recommendations, policies, or procedural suggestions.

Plaintiffs allege that governmental agencies, officers, boards, employees, and other persons exercising authority under the laws of South Carolina remain subject to these mandatory constitutional limitations.

Accordingly, to the extent Defendants' actions are determined to violate Article I, Sections 3, 8, and/or 22, Plaintiffs request that the Court enforce those constitutional limitations consistently with Article I, Section 23 and declare unlawful any governmental action undertaken contrary to those mandatory constitutional requirements.

INVOCATION OF ARTICLE I, § 16 — LIBEL

Plaintiffs additionally invoke Article I, Section 16 of the South Carolina Constitution to the extent applicable to any indictment or prosecution for libel arising from the matters described herein.

Plaintiffs specifically preserve the right to establish the truth of allegedly libelous statements and all other protections afforded by Article I, Section 16. Plaintiffs do not rely upon

Article I, Section 16 as a substitute for the separate civil defamation cause of action asserted elsewhere in this Complaint.

CONSTITUTIONAL RELIEF

As a direct and proximate consequence of the unconstitutional governmental actions alleged herein, Plaintiffs have suffered and/or remain threatened with injury to legally protected interests.

Plaintiffs therefore request, to the extent authorized and applicable to each constitutional claim:

1. A declaration identifying governmental acts, policies, practices, procedures, decisions, and/or administrative determinations that violated the South Carolina Constitution;
2. Judicial review of administrative decisions affecting Plaintiffs' protected rights;
3. An order vacating, reversing, remanding, or otherwise providing appropriate relief from administrative determinations reached through constitutionally deficient procedures;
4. Preliminary and permanent injunctive relief prohibiting continued enforcement or use of unconstitutional governmental procedures, practices, or determinations;
5. Correction, supplementation, or other appropriate treatment of governmental or administrative records determined to be materially inaccurate or produced through constitutionally deficient proceedings;
6. Such actual damages as may be independently authorized by applicable South Carolina law for the particular cause of action asserted;
7. Costs and other relief where authorized by law; and
8. Such further legal and equitable relief as the Court determines just and proper.

9. The Plaintiffs exercise their constitutional right to a trial by jury on all claims and issues, under the US and SC constitution.

VIII. PRAYER FOR RELIEF

Humanity has forgotten its duty to be JUST and fair with one other. Mothers and Fathers are at the mercy of terribly broken systems that have compromised leaders violating their oath of office to the Constitution and its amendments, and the South Carolina Constitution. How can WE fix it? By taking responsibility to do the next right thing, one decision at a time.

And so ONLY a PRAYER and ONLY FAITH and the conviction of one's soul, can change [this] projection. It starts with YOU. I PRAY from the highest Jurisdiction of the Heavens to the Jurisdiction of Land, Air, and Water, LAW, that we all CHOOSE to do the next lawful and constitutional thing, in good conscience. WHEREFORE, Plaintiffs do provide the following Prayer for relief, as well as any the court deems just and proper;

1. A declaration that the Defendant's actions violated the Plaintiff's Natural Rights also written in the Constitution.
2. Actual damages, Consequential damages, Special damages, Punitive damages, Declaratory relief, Injunctive relief, Costs.
3. Any other relief that the Court deems just and proper.
4. All defendants Removed and/or revoked from any and all Public employment, positions, certification, licensure and offices.
5. Public Letter of Apology

6. Independent **financial, structural** and **ethical**, audit of Clover School District and the South Carolina Department of Education policies and procedures including but not limited to, audit logs and meta data.
7. Criminal Investigation into individual defendants and the SCDOE, Clover School District, York County Sheriffs office, and Law firm Duff, Freeman, Seibert for Fraud, Collusion Conspiracy to Deprive Rights, and financial crimes.

WHEREFORE, Plaintiffs total claims damages from the Defendant in the sum of **\$144,000 per Defendant, per Plaintiff**, in addition to relief for time, energy, associated with enforcing these rights and abuses.

“The Constitution supersedes all other laws and the individual’s rights shall be liberally enforced in favor of him, the clearly intended and expressly designated **beneficiary**.” –Marbury v. Madison, 5 U.S. 137 (1803)

“An unconstitutional act is not law. It confers no rights; it imposes no duties; affords no protection; it creates no office. It is, in legal contemplation, as inoperative as though it had never been passed.” – Norton v. Shelby County, 118 U.S. 425 (1886)

“Where rights secured by the Constitution are involved, there can be no “rule-making” or legislation which would abrogate them.” –Miranda v. Arizona, 384 U.S. 436 (1966)

IX. CERTIFICATION AND CLOSING

Plaintiffs exercise their right to receive a copy of their **oath of office and each BOND under SC Code 8-3-30, 60, 80 by ALL DEFENDANTS** who pledge or affirm through oath of office.

Under Federal Rule of Civil Procedure 11, by providing our autographs below, we certify to the best of our knowledge, information, and belief that this Civil Action: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

Autographed 11th day of August, 2026,

X

Alexis Carberry Benson
235 Straightaway lane
Indian Land, 29707

X

Essa Almosaud
227 Lodges Ln Apt. 307
Clover, SC 29710

X

Megan Wilson
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