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JUL 29 2014

S.C. Supreme Court

**STATE OF SOUTH CAROLINA
In the Supreme Court**

**APPEAL FROM AIKEN COUNTY
Court of Common Pleas**

The Honorable Doyet A. Early, III Circuit Court Judge

Appellate Case No. 2014-001279

Alan Wilson, in his Capacity as Attorney General of
South Carolina; and others, Plaintiffs,

v.

Albert H. Dallas and others, Defendants.

Of whom Adele J. Pope, Individually and on behalf of Others under
South Carolina Trust Code Section 62-7-405, is the.....Petitioner,

And Terry Brown, Forlando Brown, James B., David G. Cannon, Albert H. Dallas
and Tommie Rae Hynie are..... Respondents,

And Alan Wilson in his Capacity as Attorney General of South Carolina, Deanna
J. Brown Thomas and Robert L. Buchanan, Jr., are Additional Interested
Persons.

IN RE:

The Estate of James Brown and The James Brown 2000 Irrevocable Trust
u/a/d August 1, 2000

**AFFIDAVIT IN SUPPORT OF MOTION TO REQUIRE WITHDRAWAL OF
COUNSEL BODMAN AND BELL**

PERSONALLY APPEARED BEFORE ME, ADELE J. POPE, who, being
duly sworn, deposes and says:

1. This affidavit is made of my personal knowledge and belief, including

seven years of dealing with David Bell, Esquire, in James Brown matters.

2. The unchecked fraud of Mr. Bell, Albert Dallas and David Cannon in the James Brown matters is something I have never seen before in a case.

3. Each statement in the Motion to Require Withdrawal which I prepared is true to the best of my knowledge and belief.

4. Mr. Bell was a central figure in most fraud perpetrated on multiple courts in James Brown matters, including the following:

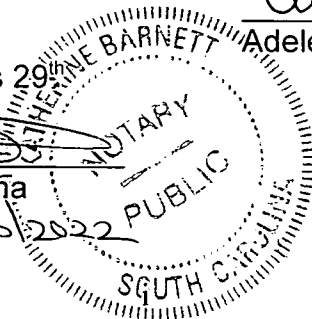
- a. The false claim that Brown's music empire was worth \$4.7 million when he died.
- b. The false claim that Tommie Rae Hynie was Brown's spouse.
- c. The false claim that Tommie Rae and her son control the termination rights to Brown's songs under the Copyright Act.
- d. The false claim that Mr. Buchanan and I committed the federal felony of intentionally overstating Brown's music empire to the IRS by \$79 million to get a \$5 million commission.
- e. The false claim that there was something wrong with the decisions to sell the GRAMMY, or to withdraw it.
- f. The false claim that Lisa, Michael, La Rhonda, Jeanette, and Nicole were not James Brown's heirs.
- g. The false claim that more than HALF (or half + 1) of Brown's heirs are needed to protect the \$3 million Royalty stream.

FURTHER DEPONENT SAYETH NOT.

Adele J. Pope

Adele J. Pope

SWORN TO BEFORE ME this 29th
Day of July, 2014
[Signature]
Notary Public for South Carolina
My commission expires: 10/23/2022



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PROOF OF SERVICE

I certify that on the 29TH day of July, 2014, I have served the AFFIDAVIT OF
ADELE J. POPE IN SUPPORT OF MOTION TO REQUIRE WITHDRAWAL OF
COUNSEL BELL AND BODMAN in the above matter on Respondents as shown
below by depositing a copy of same in the United States Mail, postage prepaid,
addressed to their attorneys of record as follows:

David B. Bell, Esquire
Matthew D. Bodman, Esquire
619 Greene Street
Post Office Box 1011
Augusta, Georgia 30903-1101

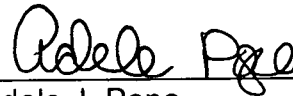
David G. Cannon
P. O. Box 865
Barnwell, SC 29812

Eugene C. Covington, Jr., Esquire
P. O. Box 2343
Greenville, SC 29602

Robert N. Rosen, Esquire
18 Broad Street, Suite 201
Charleston, SC 29401

J. David Black, Esquire
William W. Wilkins, Esquire
Tanya A. Gee, Esquire
William G. Newsome, Esquire
PO Drawer 2426
Columbia, South Carolina 29202-2426

Peter Shahid, Jr., Esquire
89 Broad Street
Charleston, South Carolina 29401



Adele J. Pope
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Petitioner, *pro se*

July 29, 2014