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SC Court of Appeals

Eric Holder
 The Attorney General of the United States
 Department of Justice
 Room 4400
 950 Pennsylvania, Avenue, N.W.
 Washington, D.C., 20530-0001
 (202)514-2001

Re: Civil Rights Violations

Dear Mr. Attorney General:

Please find enclosed further documentation regarding the unjust manner in which I have been treated by legal, financial, medical, and other institutions in Orangeburg and South Carolina in general. I have enclosed the previous packet sent to you June 13, 2011 along with further documentation to show that the events I have endured constitute sufficient cause for an investigation into what I perceive to be a violation of my civil rights. Specifically, these forces have endeavored to rob me of my ability to pursue life, liberty, and the pursuit of happiness.

Following the death of baby boy Bolin in late 1996 (see document regarding baby boy Bolin dated January 10, 1999), the Regional Medical Center of Orangeburg and Calhoun Counties' medical board requested an investigation regarding his death. Senator Brad Hutto, the spouse of Dr. Tracy MacPherson, demanded of TRMC president Tom Dandridge that his wife not be included in the lawsuit. Dr. Charles Kilgore, chief of pediatrics at the Orangeburg Family Health Center (OFHC), my place of employment at that time, relayed to me that following Mr. Dandridge and Mr. Hutto's discussion that it was requested that I be the "fall guy." I refused. Dr. Kilgore forewarned me that I would be blackballed. Incredulously, I expressed great disbelief that persons would be blackballed in this day and age. Dr. Kilgore assured me that blackballing existed and that in Orangeburg individuals didn't care if it took fifteen or twenty years for them to accomplish their objective at whatever cost it involved. I asked to what extent would someone go to blackball someone and if it included people being killed to which he gave no answer. Despite his forewarning, I refused steadfastly holding to my belief that lynching was illegal and that "blackballing" would prove an idle threat. Soon thereafter, however, I received unmerited, negative performance evaluations by my supervisors, Dr. Charles Kilgore and Dr. Sandra Stephens. My employment contract with OFHC expired in May 1998. I worked without a contract until October 1999, when I was dismissed. I

applied for and received unemployment, as an investigation by the Orangeburg unemployment office found that I was dismissed without cause from OFHC. Following the death of Baby Boy Bolin, TRMC began a "witch hunt," requesting numerous committee meetings to discuss the case, and unending chart quality reviews which provided no evidence for them to restrict my hospital privileges. TRMC lost the lawsuit filed by Baby Boy Bolin's parents and were required to pay \$1,000,000 in damages to the parents. The Baby Boy Bolin medical malpractice case against me was dismissed without prejudice. After the conclusion of the Baby Boy Bolin court case, TRMC was relentless in their efforts to determine a reason to revoke my hospital privileges. Ultimately, they requested all physicians working at TRMC undergo a handwriting quality analysis, which they stated I failed and that I would be therefore required to dictate all of my hospital notes at my expense or write my notes in block form. I refused.

Since the opening of my office in November 1999, I have been plagued with a number of disloyal employees that I subsequently discovered were "plants" by individuals attempting to corrupt/disrupt my medical practice and the other pediatricians in Orangeburg have refused/declined to share pediatric call afterhours. My first office manager, Valita Fields, was referred to me by Mr. Jim Kees, one of my three landlords at the Village Medical Park. Mr. Kees told me Ms. Fields came with excellent office credentials, which were verified upon my checking her references. Despite same, Ms. Fields frequently lied, stole money from my office, corrupted my computer, and misfiled or failed to file medical claims. One day during a visit by one of my medical supply companies, Ms. Fields bragged to one of my medical suppliers regarding her activities. My medical supplier relayed this information to me and I sharply reprimanded Ms. Fields and informed her that any future disloyal behavior would result in her immediate termination. A few months later, Ms. Fields stole money from the office petty cash fund. She was subsequently fired.

Other corrupt individuals employed by me included Jeannie Carter, my former nurse, and Nakkia Ray, Dawn Brulee, insurance claim filers. My former office manager, Debbie Bragg, discovered numerous filing errors in my medical billing computer and alerted me that someone or some individuals had attempted to corrupt my computer, but that she felt we should be able to correct the problems that had occurred. She attempted to help me in this regard, but unexpectedly died soon thereafter at approximately 37 years of age. To this date, the etiology of her death remains a mystery.

In the spring of 2000, my ex-spouse, Gerald Stewart, filed a legal claim with the Orangeburg County court, requesting he be reimbursed \$13,000 for funds received from the sale of property I owned in Aiken, South Carolina that I gave to him at the time of our divorce in January 1997. For several years following the divorce, Mr. Stewart refused to transfer the property to himself, to pay taxes upon, or maintain the property in Aiken. Several persons called regarding purchasing the property in Aiken. I informed them that my ex-spouse owned the property. I informed him that there were potential buyers for the property and that it would be wise for him to sell the property as I was no longer going to pay taxes on the property as that was his responsibility as owner of the property. He stated he wanted nothing to do with the property and that I could sell it as I wished with no strings attached. As Mr. Stewart never legally transferred the property to his ownership but did own the modular home that was erected on the property, I contacted

the lien holder for the modular home and told them that Mr. Stewart had authorized me to sell the land and the modular home erected upon it and would be contacting them regarding giving them his permission for me to legally transact business on his behalf to sell the modular home as he possessed no desire to be involved in any way with the sale or proceeds from the sale of the modular home and land. After these matters were cleared, the property was sold for \$26,000 at a \$25,000 loss from its current market value of \$51,000. The balance on the modular home was paid off with the majority of the proceeds from the sale. On the appointed court date, which was approximately one month from the time of the delivery of the court order petitioning me to come to court regarding this case, I requested a continuance to allow me time to retrieve the documents from the lien holder of the modular home to prove Mr. Stewart disavowed any interest in the property, including proceeds from its sale, as the modular lien holder stated it would take at least three to six weeks to obtain the files, which were most likely stored off-site on microfiche along with other files regarding the modular home. The judge summarily dismissed my request for a continuance and rewarded Mr. Stewart \$13,000, which I was required to pay immediately, lest I be incarcerated immediately. As I did not have \$13,000 in my bank account, the judge ordered I be incarcerated until I paid the \$13,000. It was necessary for my then husband, Dr. Marvin Wilson, to emergently open an equity line account in our names to pay the court ordered amount. The Orangeburg County Sheriff's deputy assigned to escort me to the Orangeburg Detention Center pending my payment of the \$13,000 told me he was not going to take me to the detention center, but would allow my husband time to go to the bank to attempt to get the necessary funds. I was later told by several attorneys who were in the halls outside the courtroom that day that the judge totally disregarded my rights in denying me a continuance and that her decision was completely unjust. Several of those attorneys urged me to report her to the South Carolina Bar Association. As I had no funds to employ any of those attorneys to represent my interests in that case, then or afterward, I signed the necessary paperwork to take out an equity line on my home and paid Mr. Stewart \$13,000, despite the fact that there was still \$26,000 owed on loans associated with the property in Aiken.

I petitioned the Orangeburg County Family Court for an increase in child support in October/November 1999, as well as requested that the family court have my ex-spouse, Mr. Gerald Stewart, pay his court cost directly to the court, as opposed to the court deducting them from my child support payments as they were currently doing. Despite my lack of income and a significant increase in my ex-spouse's income since the divorce in 1997, the court refused my petition without offering a reason.

In subsequent years 2000-2007, I asked the Orangeburg County Family Court and my attorney to have Mr. Stewart send me health insurance cards for our children, as he had refused to do so since 2000, all to no avail. I did not receive insurance cards for the children's use until August 2011, when a BlueCross BlueShield insurance agent informed me that the children could receive insurance benefits and insurance cards on the Away from Home plan sponsored by BlueCross BlueShield.

Other matters of great concern include Mr. Kees telling me on various occasions that there were many people who felt I was an "uppity nigger and they [didn't] want [me] to succeed in Orangeburg." He stated that he, instead, wanted to see me succeed and constantly reassured me that he was "in my corner." On one occasion he stated, "If you ever don't have enough money to pay your bills, there are other means of negotiation

(referring to sex).” I immediately informed my now ex-husband, Dr. Marvin Wilson, of this conversation and he immediately met with Mr. Kees, expressing his and my disgust with his proposition and that he was to make no such propositions in the future. No future propositions regarding sex were made after that conversation. However, while my new building was being dry-walled, someone wrote in large red letters “nigger” on my personal office’s left wall. The only persons who went into the building while it was under construction were the landlords, the construction crew, the contractors, me, and my family. When I asked Mr. Kees if he knew who wrote on my wall, he stated that he did not know and denied having written it himself.

TRMC also hampered my efforts to survive/thrive in private practice in Orangeburg by refusing to assist me in my efforts to recruit a pediatrician for my office, despite assisting numerous other physicians recruit physicians for their offices. In 2001, Orangeburg had ten pediatricians who practiced within Orangeburg County, but needed fourteen pediatricians according to the most recent supply and demand analysis for physicians per South Carolina Department of Health and Environmental Control (SCDHEC). I appealed the case to TRMC’s board of trustees to no avail. I was told by Mr. James Amaker, a member of the board of trustees, that there was a need for more pediatricians in Orangeburg, however, that Mr. Dandridge summarily stated that neither he nor the hospital would assist me in my recruiting efforts for a partner.

Orangeburg, South Carolina is a very politically entangled town, in which most persons in power know other persons in power and once a decision is made to isolate and eliminate an individual, all parties in power join in to quickly effect the desired result. To this end, soon after my troubles began with TRMC in late 1996, my local bank at that time, South Carolina Bank and Trust (SCB&T), repeatedly erroneously labeled my mortgage payments as late and refused loan requests to renovate my home, denying my loan requests solely on the basis that my salary varied from year to year, despite my salary ranging from \$200,000 to \$400,000 per year for the years I requested a loan from them (2003-2008). Additionally, SCB&T would chronically credit my electronic insurance transmissions later than customarily done by other banks, in order to force checks I had written to be dishonored or prolong my ability to access my funds by anywhere from a day to a day-and-a-half past the usual time for a transmission to be credited to a corporate business account from intrastate electronic transmissions.

I desired to buy my office at 1750 Villagepark Drive in May 2003. I informed Mr. Kees of my intent and I asked Select Health president, Michael Jernigan, to advance me my June and July 2003 Select Health payments in June 2003 so I could make my down payment of earnest money to contractually tender my offer to purchase my office to the Village Associates. Mr. Jernigan was a close friend of Mr. Kees. In fact, Mr. Kees had introduced me to Mr. Jernigan at the onset of my opening my office at 1709 Villagepark Drive in November 1999. I had, until that point, had a cordial relationship with Mr. Jernigan. After I left Mr. Kees’ office that day and telephoned Mr. Jernigan regarding the advancement of my June and July 2003 Select Health payments, I received no further funds from Select Health. I was in the process of scheduling an appointment for an annual customary chart review with Select Health, when suddenly, all of my funding from Select Health ceased and my patients enrolled with Select Health were abruptly transferred to Dr. Monty Singleton.

In late 2003, my son experienced a prolonged illness and I ultimately lost all of my former office staff. My staff expressed they feared my son's prolonged illness might force me to close my practice and they didn't want to be suddenly faced with the prospect of being unemployed.

In April 2004, SCB&T refused to accept my home mortgage payment, stating it was thirty days late, and placed my home in foreclosure, despite the fact that two weeks prior I had contacted the vice president, Gail Fogle, and informed her that I would be making my payment two to three weeks late due to my son Travis being acutely ill and that I would be presenting my son for medical care in North Carolina and that my office would be open on a very limited basis at best for an extended period of time during the time he was receiving medical care. As my mortgage loan was not due until the 16th of each month and was not late until the 26th of each month, my mortgage loan was not thirty days late when I presented my payment in April 2004. SCB&T kept my home in foreclosure for approximately seventeen months until I contacted U.S. Congressman James Clyburn, who intervened and SCB&T accepted my payments. I had initially employed attorney Michael Horger to represent me in my case against SCB&T unlawfully placing my home in foreclosure. Before employing Mr. Horger, I asked if he was in any way related to attorney Bob Horger, who was on TRMC and SCB&T's boards. Mr. Michael Horger stated that he was adopted and not a blood relative of attorney Bob Horger and that he had no problems or conflicts of interest in representing me in my legal action against SCB&T. To my dismay and anger, Mr. Michael Horger embezzled approximately \$8,000 to \$9,000 of the payments I paid him to be put into an escrow account for my home mortgage payments, stating that he assumed that part of those payments would be for his legal fees, despite having agreed to defer his legal fees until the conclusion of the case at which time his fees would be determined and paid. It was necessary for me to engage another attorney to rectify the situation. This attorney contacted Mr. Michael Horger, who immediately refunded my funds back to my escrow account which allowed me to pay SCB&T once a settlement had been reached regarding the foreclosure.

These events were very unsettling to me. I worked actively with the SC Medical Association at that time and informed Aaron Kozlowski, an attorney who worked for the SC Medical Association and was a friend of mine, of these events. He referred me to Judge Henry McKellar, as he suspected that there were numerous improprieties regarding the way in which my case was managed. Judge McKellar presented himself to Orangeburg and met with individuals from SCB&T, TRMC, and other entities on my behalf. After his investigation, he informed me that there were numerous individuals from TRMC, SCB&T, local doctor's offices, and others "who wanted me out of town and that they were going to run me out of town on a rail." When I asked him who these individuals were, he told me he could not give me any names, as the information he received was privileged.

After many months of intense psychological and psychiatric evaluation at the Duke University outpatient child and adolescent psychiatry clinic, my son, Travis, was able to recall the horrific events regarding my ex-spouse, Gerald Stewart, and his father's girlfriend, Idelprene Walker's, repeated episodes of sexual abuse of him. I immediately had Travis evaluated by Dr. Elizabeth Baker, pediatric sexual assault specialist, and Dr. Ralston at the Low Country Children's Center (for physical and sexual abuse). They

confirmed that Travis had been sexually abused and I immediately contacted the Orangeburg County Sheriff's Office, along with the Richland and Lexington County Sheriff's Offices to file charges against Mr. Stewart and Ms. Walker.

After four years and numerous requests for extensions by Mr. Stewart's attorneys, my son's case was finally ready to go to court in 2007. (Of note, my son's entire case file of expert witnesses' documents was mysteriously lost two times during the four years that three different Richland County district attorneys had been assigned to his case. I contacted all of my son's expert witnesses and asked them to resubmit their documentation to the Richland County district attorney's office.) After four years of waiting for my son's victimizers to face criminal charges for their sexual and physical assaults upon my son, South Carolina Attorney General, Henry McMaster, summarily decided not to prosecute my son's case stating it would be very costly to prosecute the case and he could not be guaranteed he could win the case and, therefore, refused to risk losing a large sum of money on a case he might lose. I, my son, and my son's expert witnesses were enraged and my expert witnesses petitioned the South Carolina Attorney General and the district attorneys for Orangeburg, Lexington, and Richland Counties to prosecute the case as I and my son's expert witnesses felt the case was more than sufficiently strong to easily win, particularly since Mr. Stewart's attorney's requested child psychology expert's evaluation corroborated that of my son's medical providers and his medical expert concluded that Mr. Stewart and Ms. Walker had physically and sexually abused my son. To my disbelief, after many months of waiting, the assistant district attorney and district attorney for Richland County never received Mr. Stewart's psychologist's report, as Mr. Stewart's attorney requested that the psychologist not present her report to the Richland County district attorney, as her report did not reach the conclusions he expected and he would not be relying upon her report or her testimony in representing his client. Mr. Stewart's attorney did not request any further child psychiatric or psychological evaluations on my son. Despite my requests to the Richland County district attorney to compel this physician to testify as a hostile witness, the case was simply closed after the SC attorney general's decision not to prosecute.

Of additional great concern, my daughter, Taylor Stewart, informed me in 2007 that Mr. Stewart had molested her during his visitations with her and her siblings in Richland and Lexington counties and that she had witnessed Mr. Stewart engaging in anal sex with my son in the shower during their visitations with Mr. Stewart in Baltimore, Maryland. Reports were filed with the Richland and Lexington County Sheriff's Departments. These cases were never fully investigated or brought to trial. They were summarily dismissed at the time the SC Attorney General refused to prosecute my son's cases.

When asked why the charges were not being investigated regarding my daughter, Taylor, no explanation was offered. Baltimore, Maryland's Sheriff's Department Child Abuse investigating division informed me they only investigated those child physical and sexual assault cases that involved "lasting, unequivocal evidence to corroborate that physical or sexual abuse had occurred e.g., scars from broken bottles or knives used to cut the victim while the act was committed or severe scarring from harsh trauma to the victim, as they had far too many cases to prosecute." I was horrified, disheartened, and left in a state of shock after hearing such a cold and heartless discussion of the manner in which cases of child physical and sexual abuse were handled in Maryland and these feelings were intensified after the cold hearted manner in which my son's case was dismissed by the SC

attorney general. I have practiced pediatrics for twenty years and have testified in sexual abuse cases with far less evidence than was present in my son Travis' case and the victim prevailed and strongly feel my son's case was dismissed improperly. The SC attorney general's office and district attorney's for Richland, Lexington and Orangeburg, SC informed me I could hire an attorney on my own and pursue the case further in civil court if I desired. Despite vigorous efforts and engaging the assistance of the SC Victim's Assistance Network, I was unable to secure an attorney to represent my son's or my interests. During my search for an attorney at this time, most of the attorneys I spoke with said I should have had a personal attorney at the outset of my son's case. I had asked the Richland County District Attorney if I needed a personal attorney at the outset of Travis' case. The Richland County District Attorney told me that was unnecessary as the District Attorney's office represented me and my son.

In 2008, my daughter, Taylor, was assaulted by four young black males wearing gang paraphernalia at Walmart Supercenter in Orangeburg, South Carolina. The assault was captured on Walmart's surveillance video camera. Charges were filed with the Orangeburg County Sheriff's Department. Lieutenant Renee Williams was the investigating officer and he insured me that he knew all the leaders of the Orangeburg gangs and would have no difficulty in determining who my daughter's assailants were. After five or six weeks, I had not heard from Lieutenant Williams. I contacted him to ascertain the status of the investigation regarding Taylor's assailants. Lieutenant Williams stated that he had not made any significant headway in identifying the assailants. Two or three months later, I contacted him again and he informed me that the investigation was closed as he was unable to determine the assailants' identities.

I viewed Walmart's surveillance videos and, other than the assailants wearing sunglasses and caps, had I known who those individuals were previously, I would have been easily able to recognize them despite their wearing sunglasses and caps.

Following the prolonged illness of my son Travis, I had to take over the medical billing for my office. Unaware of the numerous electronic abnormalities that existed in my former medical computer billing system, my computer, upon my attempts to correct medical claims, would generate new claims and ultimately result in erroneous billings unbeknownst to me. In March 2008, South Carolina Medicaid performed an audit and by May 2008, asked me to cease billing SC Medicaid patients while they continued to investigate. Attorney Stephen Williams was employed by me to represent me in this matter. As Mr. Williams was referred to me by the South Carolina Medical Association, I trusted him implicitly. Mr. Williams informed me he would need to do an assessment for conflict of interest, as he had worked for TRMC in the past. Approximately one week later, he told me there was no conflict of interest and he could represent me.

Unfortunately, in hindsight, my decision to employ Mr. Williams was not a good one. (Please see "A Case of Conspiracy" dated May 24, 2010 regarding the deception in the plea bargaining arrangement I was encouraged to sign with SC Medicaid, the poor advice I was given regarding Mr. Glenn Amick, which resulted in a default judgment and ensuing court battles by Mr. Amick to possess my home and its contents.)

In late 2008, Mr. Williams advised me I should file bankruptcy, but not inform anyone that he had told me to do so. I adamantly declined and informed Mr. Williams that as a black individual, filing bankruptcy would be tantamount to committing financial suicide.

By June 2009, my financial situation had deteriorated drastically. I contacted Mr. Williams and told him I had changed my mind regarding filing for bankruptcy and asked him if he could refer me to a good bankruptcy attorney. He referred me to Attorney Jason Moss to handle the bankruptcy stating "he knew Mr. Moss well and Mr. Moss would take good care of me."

On June 25, 2009, I was evicted from my office at 1750 Villagepark Drive. My landlords had all of my office's contents including my computers, medical records, medical equipment, and all personal effects placed outside my office on the sidewalk and grass behind my office. My landlords' attorney, Ladson Beach, telephoned me directly and wanted to know where I would be moving and sent one of his office staff to inquire what I was going to do with my medical records which had been placed outside. I informed Mr. Beach it was not his concern as to where I was moving and I informed Mr. Beach's staff member that placing my patients' charts on the ground behind my office was completely against any reasonable standards regarding protecting the confidentiality of patients' medical records, but not to concern herself as I was fully aware of and capable of upholding my duty to protect the confidentiality of my patients' records.

I located a new office the very next day and contracted to lease the office space at 795 Cook Road and asked TRMC's executive office, telephone operators, emergency department director, and medical staff office to please notify my patients that I would be relocating my practice and would be fully opened within three weeks. I asked if there would be any problem with them relaying that message and they stated "no." Despite reassuring me that they would notify my patients of my situation and TRMC including my new office address on their physician directory, published in July 2009, all of these entities told my patients that I had moved to an unknown location and that they did not know how to contact me. Needless to say, this caused quite a bit of confusion among my patients. This situation was further exacerbated by a disgruntled, dishonorable former employee, Melissa Hughes, who contacted WLTX News to state that I had abandoned my patients and left them in limbo. This is despite my having placed an ad in my local newspaper immediately following leaving my former address and notifying the readership of my new address and my having contacted the aforementioned entities/key personnel at TRMC to ensure that they would be able to forward both my home and mobile telephone numbers to my patients so they could contact me during the process of relocating my office and telephone/key system.

These matters were further compounded by AT&T refusing to remove my key system from my former office building to 795 Cook Road due to their allegation that I owed them a balance for maintenance services which I refused to pay over the preceding four year period of time, due to the fact that my key system worked improperly because it was installed improperly with substandard equipment according to one of their workers in 2004-2005 and they refused to repair it properly or replace it. Upon my attempts to have the electronic repairman/telephone wiring specialist who worked for my landlords and, by his report, was well trusted and had keys to enter into all of their buildings, retrieve my key system, he offered poor excuses as to why he failed to enter into my former office, which was unlocked by my landlords, and retrieve my key system to relocate the key system to my new office on three separate occasions.

Approximately three and a half weeks after leaving my former office, WLTX's reporter Jerome Collins contacted me via telephone the morning of the day they aired a very

negative portrayal of me as abandoning my patients on local and state news. I missed Mr. Collin's call that morning by a split second. I immediately returned his telephone call, only to receive his voicemail and graciously asked if he would return my call and please inform my patients that I was sincerely sorry for any inconveniences they were having in contacting/locating me and that I was located at 795 Cook Road and that I could be reached by both my home and telephone numbers. I left both telephone numbers on Mr. Collin's voicemail and asked Mr. Collins to please return my call. I never received a return call from Mr. Collins. Instead, he proceeded with two days of derogatory television coverage of me abandoning my patients.

A former employee, Melissa Hughes, contacted another one of my former employees, MaryAnn Clark, via telephone a few days later while, unbeknownst to Ms. Hughes, Mrs. Clark was in my office talking with me. Ms. Hughes proceeded to gloat regarding how I would never discover that she orchestrated the WLTX News debacle. Mrs. Clark placed Ms. Hughes on speaker telephone as Ms. Hughes continued to recount her efforts regarding the WLTX News debacle and again attempted to get Mrs. Clark to join her in her efforts to undermine me publicly. Several of my patients also informed me that Ms. Hughes had attempted to recruit them to participate in this sordid series of events.

In August 2009, SCB&T abruptly closed my personal and business accounts and equity line. I attempted to speak with President Gene McConnell to have my accounts and equity line reopened to no avail. Mr. McConnell stated that as I had filed bankruptcy and had a bankruptcy attorney, I would have to have my bankruptcy attorney speak to the bank's attorney regarding this matter. I contacted Mr. Moss, who contacted SCB&T's attorney. According to Mr. Moss, despite much pleading on my behalf, SCB&T refused to open my personal and business accounts and equity line despite the obvious fact that refusing to reopen my accounts would severely harm me financially as it would take at least three weeks or more to establish new bank accounts at another bank and reroute all of my electronic insurance claim deposits (see letter to bank controller).

SCB&T continued to handle my account differentially, even on occasion requesting I make cash payments instead of paying with a check and requiring me on most occasions to leave the drive-thru teller line, go inside the bank, and then to the business office upstairs to have my payments "specially processed." This process would take approximately thirty to thirty-five minutes more than standard payments through the drive-thru line.

Repeated requests by me to AT&T to move my telephone key system were denied. Ultimately, I employed Mr. Buddy Ellis, who moved my key system on August 29, 2009. That following day, Sunday, August 30, 2009, AT&T agent Mr. Donny Anderson called me early in the morning to ask if he could come into my new office and perform a system check. I asked him when he began performing Sunday service calls. He stated that AT&T had been doing Sunday service calls for a few years. I informed him that my service was working fine, but he insisted on performing the system check. My system was performing well when he arrived; however, after Mr. Anderson went to my control station and inspected my telephone and key system, my computer system suddenly stopped working. I asked him what he had done and he said "Nothing." I asked if he could go back and discover what was wrong and he said that he was not allowed to perform repairs and that I would have to call AT&T's repair center the next day. I had just run a system check on my computer system prior to Mr. Anderson's arrival which

showed all systems to be functioning well. After Mr. Anderson left my control center for my telephone and computer, the system check was rerun and documented a failed computer system. Needless to say, I had waited since June 2009 to file my claims and was not able to file them after Mr. Anderson's visit, as my key system was no longer working.

Two months after I had moved to 795 Cook Road and was actively referring patients to TRMC for medical services, TRMC continued to state to my patients and prospective patients that they did not know where I was located, despite the fact that I was right down the street from them (TRMC is located at the intersection of St. Matthews and Cook Roads, seven blocks from my office on Cook Road.)

In September 2009, I was evicted from 795 Cook Road, despite having informed my new landlady that I was having difficulty obtaining my key system and that after I had obtained my key system following the AT&T agent's visit, my computer billing system was no longer working and I would not be able to file my medical claims for an additional few days and therefore would be delayed two to three weeks in making the balance of my August 2009 lease payment and my September 2009 lease payment. Despite my appeals, my landlady evicted me. I appealed the eviction. Initially, the judge did not request a deposit. I was told by the Orangeburg County Magistrate Court's clerical staff that my appeal request was being processed and that I would be notified of my court date once it was assigned. Approximately one month later, the sheriff's deputies arrived at my office and evicted me. I contacted Judge Richard Murray and asked why I was being evicted despite my request for an appeal having been previously accepted. At that time, Judge Murray stated that I did not include a deposit with my request and after discussion with my landlady's attorney, he reviewed my request again and decided at that time to reject my appeal due to my failure to include a deposit with my request for an appeal. When I asked him why he had not contacted me by telephone, letter, courier service, etc. regarding his desire for a deposit he gave no response. (I consulted with an attorney prior to filing my request for an appeal of my eviction who informed me that including a deposit with the appeal request was optional and that if the judge desired a deposit he or she would let me know upon receipt of my request for an appeal.)

In the midst of the horror and upheaval of two relocations of my medical practice in three-and-one-half months, was the financial and emotional toll exacted upon me by Moss & Associates. Mr. Moss and his firm Moss & Associates poorly handled three bankruptcies I filed with his firm. Mr. Moss and his associate Attorney Jane Rutschky grossly misrepresented my interests. Mr. Moss instructed me to ignore requests by the SC Department of Revenue (SCDOR) to resume my corporate SCDOR payments, stating my corporate debt rolled over to my personal debt as my office was an S corporation and was covered by my personal bankruptcy and that my SC Medicaid restitution payments could be included in my personal bankruptcy and "crunched to zero." Despite my request for Mr. Moss to speak directly with my SCDOR representative, Mr. Jack Rash, on numerous occasions to clarify the matter and Mr. Moss' agreeing to do so, Mr. Rash informed me that Mr. Moss did not contact him and that Mr. Moss should have known better than to file my corporate debt in my personal bankruptcy as he worked for SCDOR for three years prior to becoming a bankruptcy attorney. SCDOR subsequently levied my Blue Cross/Blue Shield insurance payments.

Ultimately, SC Medicaid had my case referred to circuit court for nonpayment. Mr. Moss refused to appear in court to state his involvement in these matters and I was immediately incarcerated following my June 29, 2011 court appearance (please see attached documents). I was provided no time to properly disposition the care of my patients, my medical practice, or my children. I was ordered to be immediately incarcerated with the general inmate population at the Orangeburg County Detention Center (OCDC), which included HIV positive inmates, as well as inmates who had severe psychiatric illnesses and threw feces from their cells. At the time of my incarceration, one of the arresting officers asked the judge if I should be put in isolation or be incarcerated with the general population to which the judge, Terrell Cothran, tersely replied, "No. Put her in with the general population." As I did not know what isolation meant, and I had no attorney to explain the process to me, I was afraid to ask what isolation entailed as compared to incarceration with the general population. I feared isolation was an enhanced form of punishment designed to in some way provide further torture to the imprisoned individual and simply acquiesced to the judge's sentence after my repeated pleas for a continuance were denied.

I filed official complaints against Mr. Moss and Ms. Rutschky with the Office of Disciplinary Counsel of the SC Bar Association on May 18, 2011 (see attached letter). Mr. Bill Campbell was the investigating officer. He asked me to send documentation and the names of individuals who could verify my charges against Mr. Moss and Ms. Rutschky, yet he failed to contact any of the individuals I submitted to him. My case was closed and the cases were dismissed against Mr. Moss and Ms. Rutschky in late October 2011. I immediately contacted the Office of Disciplinary Counsel and spoke with director Lesley Coggiola and expressed my discontent for the manner in which Mr. Campbell failed to present my interests before the counsel and that his lack of action directly influenced the cases being dismissed against Mr. Moss and Ms. Rutschky. Ms. Coggiola stated she would reopen the cases and properly investigate my charges against Mr. Moss and Ms. Rutschky. The case remains under investigation as of the date of this letter. I was informed by a well-respected attorney in Charleston, South Carolina that because I did not have an attorney present my interests to the South Carolina Office of Disciplinary Counsel regarding Jason Moss and Jane Rutschky, there was very little chance of me getting a judgment issued against them, no matter how grievous their actions were or how well-presented my accounts were of their actions.

My father attempted to employ several local attorneys at the time of my incarceration in June 2011. None of the attorneys would take my case because of fear of retribution by those powers that are oppressing me. One attorney told my father, "I can't help your daughter. She's been blackballed. All the attorneys have been told if they help her, they will be blackballed too. I can't help you. I have a family to take care of."

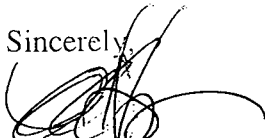
Other occasions regarding improprieties involve my local Chrysler dealership refusing to properly repair my 2204 PT Cruiser despite my having purchased it brand new and having presented it with numerous obvious electronic malfunctions since it was two and one half to three weeks old which would have qualified my PT Cruiser for a return under the Lemon Law (see attached document). Ultimately, my car stopped working completely in April 2010. When two other local mechanics attempted to help me in repairing my car in 2010 and 2011, they suddenly declined to assist me further. They stated that they did

not feel comfortable working on my car because it had so many "issues" and they did not want to be responsible for any problems it might have in the future.

It is very difficult to locate an attorney to represent me in the above matters, not only in Orangeburg, but throughout the state of South Carolina. All attorneys that I have contacted have either simply declined to represent my interests or have presented me with fees that are so high (e.g. \$50,000 to perform a legal malpractice case against Jason Moss and his associates and Stephen Williams) as to make legal representation unaffordable. Due to my bankruptcy status and now poor credit, a bank loan, even from a "loan shark" entity, is no longer an option. Local attempts to raise money among colleagues is impossible for fear among colleagues they too will be "blackballed" and attempts to reach celebrity donors have been fruitless. My present salary is only \$37,000 to \$40,000 per year. I am unable to be employed in any meaningful capacity (e.g. teaching adjunct professor, ER, or other moonlighting adventures) due to my SC Medicaid and Office of Inspector General (OIG) exclusions. These exclusions also extend to some of my patients on commercial insurance whose prescription benefits are via CVS Caremark, as CVS Caremark utilizes OIG as a screening tool, prescriptions written by me are not able to be filled under these patients' prescription plans.

Effectively, my practice has been reduced to 10 to 15% of its previous volume. I am barely able to secure sufficient funds to pay my basic office and personal bills. The attorneys and individuals involved in the events of recent are very aware that without means to be gainfully employed, it would be impossible to meet my financial obligations and I would ultimately lose all of my possessions to creditors and eventually, my freedom as failure to pay the South Carolina Medicaid restitution by May 10, 2015 would result in my incarceration. I have not billed South Carolina Medicaid since May 2008. I was excluded from South Carolina Medicaid in 2010. OIG excluded me for five years in late 2010. South Carolina Medicaid added an additional five years to my exclusion due to the OIG exclusion, effectively excluding me from South Carolina Medicaid for eight years beyond the two years since May 2008, virtually insuring I would not be able to repay my South Carolina Medicaid restitution. Please help me.

Sincerely,


Beverley D. Wilson, M.D., F.A.A.P.

Leigh Ann Newsome
exp 2/2/2017

