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June 13, 2011

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SEP 12 2014

SC Court of Appeals

Beverley D. Wilson, M.D., F.A.A.P.
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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: Total Miscarriage of Justice

Dear Mr. Attorney General:

This letter is drafted to you as a plea for assistance in fair legal jurisprudence in a situation that has been little more than a living nightmare and a modern day lynching for me and my family for the past fourteen to fifteen years. I reside in and practice medicine in Orangeburg, S.C. Numerous events have transpired/been conspired over the past fourteen to fifteen years in attempts to "persuade" me to choose somewhere other than Orangeburg, S.C. to reside and practice medicine. (Please see enclosed letter to Judge Manning dated May 24, 2010 regarding conspiracy theory.) I have spent much money over the past fourteen to fifteen years on legal fees in an attempt to exact some measure of justice in a very unfair, racially and politically charged town and state that favor friendship and political ties over justice just to have judges render decisions that oftentimes had very little to do with justice or fairness. I have paid attorneys legal fees that subsequently compromised my legal representation to further their own personal interests by proffering me legal advice that was not in my best interest in the least to blatantly negotiating with opposing counsel behind the scenes to purposely ensure my case(s) would be unsuccessful. This corruption spans even to the office of the South Carolina Attorney General.

Most disturbing, has been having to constantly deal with employees that had been sent as "plants" to my office to disrupt my practice and ultimately corrupt my medical computer and billing system resulting in me being charged with computer fraud and being expelled from both the South Carolina and Federal Medicaid Programs and, despite advice given to me by my attorney, being told by both the South Carolina and Federal Medicaid Program that I could not appeal the sentence and subsequent exclusions which were

entered into with great resignation on my part as a plea bargain due to the death of my star witness, lack of any additional funds for legal services, and to avoid public trial and testimony which would have divulged my family's darkest nightmare the repeated sexual molestation of my eldest child over a five to six year period resulting in a complete mental and psychological/psychiatric disassociated state due to severe post-traumatic stress in my son and the sexual molestation of my second eldest child during this same period of time by my ex-spouse, their biological father. The case involving my son was completely mishandled by the South Carolina Office of the Attorney General and the case involving my daughter was never investigated. I am a pediatrician and have fought for years for the rights of my pediatric patients who have been sexually abused or molested only to be so unfortunate as to see the rights of my children and family be totally overlooked and trodden upon by my state's judicial system and be told I have no right to an appeal process as the South Carolina Attorney General has complete authority in deciding which cases he prosecutes. I was told by the South Carolina Attorney General's office that my son's case would be too expensive to prosecute and that because the South Carolina Attorney General could not guarantee a successful outcome despite outcries from our expert witnesses from the Medical University of South Carolina's National Crime Victim Center and the Low Country's Children's Center in Charleston, S.C. who, undoubtedly are the state of South Carolina's foremost authorities on sexual and physical abuse and molestation and the fact that my ex-spouse's requested expert witness concurred that my son had been sexually abused and was therefore told by my ex-spouse's attorney that her report would not be used in court and, therefore was told to squelch her report, he could not justify spending so much money on one case. We were told by the South Carolina Attorney General's office that we could pursue the matter in civil court using our own funds. My son, my daughter, I and my family were totally devastated emotionally and as we did not possess adequate funds to pursue the case in civil court, nor could find an attorney who would take the case on a pro bono or reduced fee basis, we were unable to see any justice meted out against my children's abuser(s). The attorney that represented me in the Medicaid trial advised me that subsequent to the trial being plea bargained, I would be able to do locum tenens or work for local health departments in order to secure funds to pay restitution for funds overpaid to me by Medicaid. Both activities are prohibited by the Medicaid exclusion. This attorney also improperly advised me that if I chose not to appear in an earlier civil court case in 2008 in which I defaulted on payments to a contractor that was making home improvements on my home (due to lack of funds) at the onset of the Medicaid investigative phase, that, at most, the contractor would be awarded a judgment against me which he would most likely not execute as I could pay him off later after my legal troubles were settled and worst come to worst, I could declare bankruptcy. I trusted my attorney, followed his advice and employed the bankruptcy attorney/firm he referred me to in 2009. My life has been a living nightmare since. The bankruptcy attorneys in the firm I was referred to poorly handled my cases, committing what other bankruptcy attorneys have since told me is legal malpractice and ultimately resulted in my filing complaints against my bankruptcy attorneys and requesting an investigation into their representation of me for legal malpractice and ethics violations to the South Carolina Office of Disciplinary Counsel for consideration May 2011. To complicate matters further, the aforementioned contractor who was awarded a judgment against me in June 2009, on last week was

allowed an extension of his previous execution of judgment order against me giving his receiver full authority to do with my personal and professional assets whatever he feels is in his client's best interest to satisfy my debt to him despite my pleas to the judge to grant an extension of my case and await the decision of the South Carolina Office of Disciplinary Counsel before he made such a far reaching decision as any protection afforded to me by the bankruptcies I filed were unfairly taken away from me due to the incompetency of my attorneys and the fact that the attorney I desired to represent me could not be in court the day of the hearing due to a previously scheduled trial and that I was effectively without legal representation in such an important matter. As my funds were extremely limited, I begged the judge to have just a portion of compassion and not engage what would be a most disastrous set of circumstances by giving a receiver full access to my assets in the absence of the bankruptcy afforded protection as I tried to reorder my financial obligations so that I could settle them appropriately. My requests fell on deaf ears.

Other unfair instances of unfair treatment by my local judicial system include, but are not limited to unfair adjudication of evictions from my office in 2009 despite a properly filed appeal to the appropriate circuit court in South Carolina. The attorney that assisted me with the filing of the paperwork for the appeal informed me that the judge would ask me to make a deposit to secure the interests of the landlord in the appeal if he felt a deposit was necessary. No request was made by the judge in writing, via telephone, or any other form of communication to me. Sheriff's deputies were dispatched to evict me from my office approximately two and one half to three weeks later and at the subsequent trial five months later, when I asked the three judges present why I was not informed by the presiding judge he required a deposit after the landlord's attorney held private discussions with the presiding judge without my knowledge and demanded my appeal be dismissed because no deposit was enclosed with my request for an appeal, the three judges summarily dismissed my question and informed me that "to file an appeal, you need an attorney," but, declined/refused to answer my question any further. More recently, March 18, 2011, after failed attempts to have my medical records and billing vendor give me one to two more weeks to begin payments on my past due account with them due to my extremely strained financial resources due to recent legal expenses associated with the conclusion of a two year long divorce February 1, 2011 and three bankruptcy filings over the past one and one-half years, my medical records and billing company has completely ceased to allow me to bill for what few patients remain in my practice effectively presenting me with a nearly impossible case scenario to make timely payments on my financial obligations. This same company has charged me upwards of \$450/month for medical records and billing services even after I informed them in mid October 2009 I could no longer access the medical records portion of my medical computing system since moving into my new office in mid-October 2009 after eviction from my former office and they have refused to offer me assistance in diagnosing the lack of my ability to access my medical records portion of my medical computing system due to the fact that I was "on credit hold because of my outstanding balance and they would not be able to even log a call stating I requested services from them." I have received this response three times over the past one and one half years. In desperation, in April 2010, I asked them to stop charging me for the full balance of the medical software support as they were providing me no service in that regard. This April 2011, I asked them to charge me

for only one user license fee as I no longer needed three license fees, as I downsized my office to one licensed user in July 2009 and I discovered after an outside telecommunications and IT expert analyzed my medical records and billing computer system that the medical record portion of my computer system had crashed in mid October 2009 and I needed to investigate what my legal options were regarding ceasing all services with their company, paying off a renegotiated more appropriate balance owed to them reflective of the services provided to me by their company– this request to date has not been honored. Additionally, I am prohibited from contracting with the companies they actually sublet my medical records and billing services from as I have a balance with them as my medical records and medical billing vendor for these services. Effectively, I have a medical records and billing services I paid \$35,000 for in March/April 2008, with approximately \$5,000 to \$6,000 paid in 2009 and 2010 that is totally useless to me. Members of the management team at my computer vendor company are related to persons in Orangeburg and I really cannot say at this time what would convince a person in control of billing/finances at this computer company to employ tactics that obviously would completely shut down my practice. I have used this company since 1992, but am scrambling to find means to remain viable financially and they could care less.

Adding an additional complicating factor, May 13, 2011, my current landlord served me with an eviction notice for failure to pay my office lease when due. I had paid my landlord all but \$350 of my April 2011 office lease and the May 2011 office lease of \$1,100 was due and payable May 10, 2011. I had informed him verbally I no longer had means of electronically billing for my medical services, but would pay him every week to every other week until I could reestablish my electronic medical billing with another vendor, but that, in the interim, I would drop my billing claims to paper (a more lengthy and laborious process to receive payments for medical services rendered). Despite paying my office lease up to date by the required time, a sheriff's deputy was still dispatched to my office during business hours to evict me May 31, 2011. The sheriff's deputy informed me he had not been informed that the debt was settled, but left after I told him I had paid my landlord in full May 28, 2011. The landlord has since confirmed receipt of my office lease payments in full for April and May 2011 along with attendant late fees and court fees incurred.

Any attempts at consolidation loans are fruitless as my credit is completely ruined and I am now labeled a convicted felon. My previous bank, SCB&T, was so egregious in their unprofessional treatment of me and my bank accounts with them, that I filed an official complaint against them with the Office of Comptroller of Currency Administrator of National Banks in April 2010, only to have the Office of Comptroller of Currency Administrator of National Banks take until February 2011 to inform me they could not render a decision in my case as I was in bankruptcy (I wasn't at that time – my third bankruptcy case was dismissed with prejudice November 30, 2010) and my case could result in legal action therefore, they declined to get involved and instead suggested I seek legal recourse to address my concerns with SCB&T despite my having informed the Office of Comptroller for Banks at the very outset of my case that I had attempted several times over the past decade to seek legal representation for my concerns regarding SCB&T without success because SCB&T employs attorneys with numerous political and business connections throughout the state and no attorney firm was willing to go against them other than one local attorney who instead used my employment of him to embezzle

my mortgage payments made to him (which were supposed to have been placed in an escrow account until the case was settled in which SCB&T had foreclosed on my home when I was 30 days late making a mortgage payment in 2004 when my son was critically ill and required medical treatment out of state despite the fact that I had informed SCB&T before my payment was late that I might go a few days to a week past the 30 day period required for the mortgage payment to be made).

On an even more personal, painful, and disturbing note, I have been so bereft of funds due to payments made to the bankruptcy attorneys employed and my bankruptcy attorneys and U.S. Bankruptcy Court Trustees' advice I was not allowed to make payments toward my children's past due accounts at their former private school Heathwood Hall Episcopal School unless I was making payment to all of the creditors on my bankruptcy filing, that my second child was unable to complete even a small portion of her senior year with a promise by me to pay the remainder of my balance with Heathwood once all of the legal complexities were resolved. My children had all been enrolled at Heathwood since first grade. I have struggled and sacrificed much over the years to keep them enrolled at Heathwood due to high level of violence, drugs, sex, and undesirable social atmosphere at our schools in Orangeburg. Poignant examples of this violence include the following two case scenarios. Approximately five to six years ago, a female student was violently raped by a football player at our local high school despite her cries for help being overheard by several teachers, none of them came to her rescue and very little punishment was meted out by our local judicial system in this matter due to the highly charged political atmosphere surrounding the case. Likewise, my daughter was accosted by four gang members from our local community/high school one Sunday afternoon two years ago in Wal-Mart who were attempting to abduct her to probably rape her we were told later as the attempted abduction occurred during the time commonly referred to locally as their "gang initiation period." Despite, the encounter being captured on Wal-Mart's video surveillance system and the only disguise worn by the would be abductors was a baseball cap and sunglasses, and the local sheriff's deputy informing me and my daughter at the information gathering interview at his office that he personally knew all the gang leaders in this community and it should be very easy to have the gang members captured on the videotape surveillance film identified by their gang leader and fellow gang members and prosecuted subsequently, nothing materialized and we were left with an empty promise and a feeling of bewilderment along with a lack of trust for our local sheriff's office, not to mention a complete lack of confidence in the safety of our community against gang violence. The attempted abduction of my daughter occurred only a few yards away from the check out line I was in, and after my daughter used karate maneuvers she had been taught during her younger years to disengage from her would be attackers and ran back to where I was and described her would be assailants, I quickly dialed 911, informed the attendant at my checkout line to contact the store manager and store security and quickly moved toward the gang members in order to get a glimpse of them before they exited the store. I actually engaged three of the four gang members in conversation and was able to request that they not leave the store until the police arrived to question them and with the assistance of Wal-Mart's assistant manager was able to detain the gang members for approximately ten to fifteen minutes before the gang members decided we had no means of forcing them to stay and left the premises. The 911 responders and Wal-Mart security each took approximately thirty minutes to

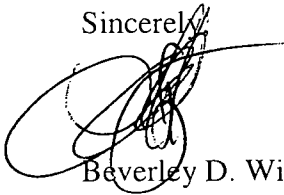
respond to their calls.) As there are no refunds of funds previously paid to Heathwood if you fail to graduate due to an inability to attend Heathwood your senior year due to an outstanding balance and I desperately desired my second child graduate from Heathwood and be able to attend at least a small portion of her senior year at Heathwood, at the beginning of the 2010-2011 academic year, I pleaded with Heathwood Hall's finance director to please at least allow my second child the opportunity to participate in the Senior Project, a yearlong project that is mandatory for graduation from Heathwood as I scrambled to secure sponsorships and any other funding to be able to cure out at least half of my balance with Heathwood. I was told that due to my outstanding balance, no exceptions could be made for my daughter unless at least half of the balance owed or some other very substantial portion of the balance was paid. On the other hand, two students, one of whom was also enrolled at Heathwood since first grade, was student body president, and whose mother worked at Heathwood and the other who was an athlete at Heathwood, but were both expelled at the end of the summer 2010 session for smoking marijuana on Heathwood property immediately adjacent to the Heathwood campus but, had the ability to pay their tuition for the 2010-2011 academic year were allowed, despite being expelled, to present to campus for any and all activities related to college advisement, college applications, and the senior project from the beginning of the fall 2010 semester onward and subsequently graduated in the spring of 2011 with their class. One of these students has subsequently been accepted into the University of South Carolina's Honors College and the other student is enrolled at the University of South Carolina as well. As these students' incidence of drug usage on Heathwood Hall's property falls outside the jurisdiction of the Richland County Sheriff's Department and, therefore, is not a reportable offense which can be included in either of their records. The South Carolina Independent School Association refuses to get involved in this matter stating it is up to the individual private schools as to how they administer their affairs regarding drug use/abuse on/near their campuses. I was able to get one school, Hammond Hall, who referred me to their drug policy on their website, to admit for the record that expulsion means for their school, as it does for public schools in South Carolina in general, that the student may no longer attend the school much less participate in any school related activities once expelled.

My daughter is an exceptional "A/A-" student. She didn't deserve to be collateral damage in this deplorable scenario. Even direct communication with the chairperson of the board at Heathwood and the mayor of Columbia who initially agreed to assist me with my negotiations with Heathwood to at least allow my daughter to participate in and present her senior project along with the other seniors at Heathwood to protect her ability to graduate from Heathwood even if it had to occur at the close of summer 2011 after her class had already graduated, once my financial arrears with Heathwood were settled, fell on deaf ears. Heathwood instead preferred to protect the interests of students who admitted to drug use on their property as long as they could pay their bill and took no concern for the devastating emotional impact this entire ordeal has had on me and my children. I have had a most rude awakening to the harsh realities of the inequities in how people are treated by institutions that purport equity of treatment of people/students – that treatment is equal only insofar as that student's ability to pay for the right to be treated with dignity and respect. Beyond that, no equity exists and justice is a far removed fantasy.

This case takes on even more nefarious undertones as I am completely in no position to make any payments toward restitution toward Medicaid overpayments made to me as I am still unable to employ full electronic billing with my commercial insurance carriers. I was in South Carolina General Sessions Court in Orangeburg, S.C. April 20, 2011 and was told by the judge to return to court June 29, 2011 with record of payments made toward my Medicaid restitution and supervisory fees with an attorney to represent my interests more effectively as my bankruptcy attorney completely misadvised me on my Medicaid debt being subject to bankruptcy court fee reduction schedules and improperly filed my bankruptcy cases. Needless to say, I have neither funds to make anything resembling an adequate payment toward my restitution and I do not have funds to secure an attorney to represent me and having made \$39,300 in 2010, I am not poor enough to qualify for a public defender, though a public defender was gracious enough to assist me during my testimony before the judge in circuit court in April 2010.

At this point, I am totally distrustful of any court proceedings in Orangeburg or South Carolina in general. I thoroughly trusted in our legal system until the aforementioned atrocities involving the South Carolina Attorney General's handling of cases involving me and my family. As I see it, justice does not exist in this state if you are not part of the desired establishment. I have been "blackballed" since 1997 with what I now understand to be the expressed intent of whoever the "kingpin" is of being totally annihilated and eradicated. Please help me. If you don't, I don't know who will. The General Sessions Court judge has forewarned me that inability to pay something of substance on my restitution balance will leave him no choice but to remand me to jail. This would leave my children without a mother to assist them and would effectively close my practice and forfeit all of my assets. I am adopted, have no personal relations with any parties capable of assisting me in my financial troubles, and both of my parents are elderly, retired cancer survivors.

Sincerely,



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

Enclosures:

Letters:

May 24, 2010 A Case of Conspiracy

June 21, 2010 Comptroller of the Currency Administrator of National Banks (includes letter April 29, 2010)

June 25, 2010 Response to National Practitioner Data Bank Entry, SC Attorney General
May 24, 2010



July 22, 2010 Director, Division of Appeals and Hearings Department of Health and Human Services

September 15, 2010 South Carolina Department of Labor, Licensing, and Regulation

October 25, 2010 Department of Health and Human Services, Office of Inspector General

May 18, 2011 Office of Disciplinary Counsel Commission on Lawyer Conduct
Enclosures (cont'd):

November 26, 2010 Linda K. Barr

November 19, 2010 Reasons to confirm my bankruptcy

Tables:

Wilson Pediatrics, Inc. Monthly Expenses, Beverley D. Wilson, MD Monthly Expenses
Tables

Beverley D. Wilson, MD Net Worth as of September 28, 2010 Table

Other:

Court of Common Pleas First Judicial Circuit C/A Number 09-CP-38-0577 Order of
Receiver Appointment Amick Millwork & Supply v. Beverly Wilson

Indictment and Sentence Sheet November 18, 2009 and May 24, 2010, respectively

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

National Honor Society Student Activities and Accomplishments, Work Experience,
Recognition, Awards, and Additional Information Taylor Danielle Stewart

September 12, 2014

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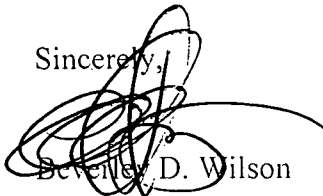
Re: Beverley D. Wilson, Appellant vs. Stephen P. Williams, Respondent
Original Case Number: 2013-CP-23-5177
Appellate Case No: 2013-002688

Dear Ms. Kitchings:

I respectfully submit a ^{BY [initials] 9/12/14} ~~time stamped~~, original, unbound copy of the Final Brief of Appellant along with fifteen (15) copies of the July 6, 2012 and June 13, 2011 Letters to the Honorable Eric Holder, The Attorney General of the United States to be submitted to the South Carolina Court of Appeals in the above referenced case. I humbly apologize to the Court for not including them in the Record on Appeal. Appellant was unaware that permission had not been granted for their exclusion from the Record on Appeal. Appellant awaits the Court's review of this matter and further instruction regarding the Record on Appeal.

Appellant has also submitted three (3) copies of the Letters to the Honorable Eric Holder July 6, 2012 and June 13, 2011 to opposing counsel, Michael D. Glenn, Esquire. I enclose herewith a copy of the Proof of Service submitted in today's mail to Mr. Glenn. Please time stamp these documents and immediately file them with the South Carolina Court of Appeals.

Sincerely,


Beverley D. Wilson

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SEP 12 2014

SC Court of Appeals

September 12, 2014

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PROOF OF SERVICE

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(864)226-0561 (fax)

Re: Beverley D. Wilson vs. Stephen P. Williams
Original Case Number: 2013-CP-23-5177
Appellate Case No: 2013-002688

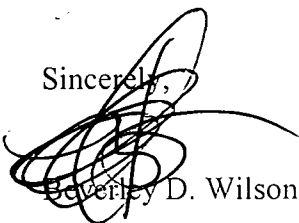
Dear Mr. Glenn:

Please find enclosed a copy of the letter submitted today to Jenny Abbott Kitchings, Clerk of Court of the South Carolina Court of Appeals along with three copies of the following documents in the above referenced case:

1. Letter to The Honorable Eric Holder, The Attorney General of the United States dated July 6, 2012
2. Letter to The Honorable Eric Holder, The Attorney General of the United States dated June 13, 2011

These items were submitted to you by depositing same in today's U.S. Mail.

Sincerely,



Beverley D. Wilson

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SC Court of Appeals