

BRIDGETTE TARA NEAL-Prose  
312 Green Street  
Belton, SC 29627

COURT OF COMMON PLEAS  
ANDERSON COUNTY SC

Case No: 2014-CP-04-01045

BRIDGETTE TARA NEAL,  
Plaintiff,  
Vs.  
James Edward Neubia, & Family Co-  
Conspirator, Keith Williams,  
Belton City Police Department  
(Officers: Gray, Turner, & Lowe  
State Farm Claims, & SCDMV  
Defendant (s)

COMPLAINT OF WRONGFUL CLAIM AND  
DELIVERY. FORGERY, FRAUD, BAD  
FAITH ACT, BREACH OF TRUST,  
NEGLIGENCE AND OTHER TORTS

COMMON PLEAS AND  
GENERAL SESSIONS

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FILED CLERK'S OFFICE  
ANDERSON SC

NATURE OF THE ACTION

Plaintiff BRIDGETTE TARA NEAL, brings this action on her own behalf, hereinafter known as Plaintiff.  
Plaintiff is a resident of Anderson County, South Carolina.  
Defendant(s), James Edward Neubia and also hereinafter known in this complaint as defendant, as well as other co-conspirator family members, Keith Williams, Belton City Police Department, State-Farm Claims and SCDMV, is an individual of 208 Douthit Street. Greenville South Carolina 29601, and at all times herein mentioned was always, a resident of the City of Greenville, County of Greenville, State of South Carolina.

1 Defendant, James Edward Neubia, involved family other family members  
2 to assist with the wrongful taking of her 2009 Honda CRV-  
3 VIN#5J6RE38359L013972 Plaintiff, is an individual  
4 ignorant of the true names and capacities of defendants sued herein  
5 as DOES I through X, inclusive, and therefore  
6 sues any and all of these defendants by such fictitious names.  
7 Plaintiff, the individual will amend this complaint  
8 to allege their true names and capacities when ascertained.  
9 Plaintiff, an individual is now informed and believes without doubt  
10 and thereon acknowledges and alleges that, at  
11 all times herein mentioned, each of the defendants sued herein  
12 within the purpose and scope of such action did willfully intend to  
13 commit an act wrongful claim and delivery, intent to commit  
14 forgery, intent to commit fraud, intent of bad faith act, breach of  
15 trust, negligence and numerous other torts.  
16 Plaintiff was introduced to James E. Neubia by Keith Williams a  
17 finance manager currently with Crown Nissan of Greenville, SC.  
18 Laurens Road.  
19 Plaintiff is insured with State Farm.  
20 Plaintiff alleges Wrongful Claim and Delivery.  
21 Plaintiff alleges Forgery, Fraud, and Bad Faith Act.  
22 Plaintiff alleges Negligence & Breach of Trust.  
23 Plaintiff alleges Other Torts of Trespass and Chattels.  
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**JURISDICTION**

This court has Subject Matter jurisdiction, Original jurisdiction and General jurisdiction, over the Plaintiff and is authorized to hear and decide this case.

The Plaintiff is a resident of Anderson County.

The Plaintiff is a struggling business owner in Anderson County.

The Venue is proper, the act occurred in Anderson County.

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**FACTUAL BACKGROUND**

Plaintiff contracted with Defendant James E. Neubia to grant a loan at her residence at 312 Green Street on or about 07/17/2012.

Keith Williams set up the initial introduction and the loan between the parties.

Plaintiff agreed to a verbal contract stating the terms agreed upon by parties on the same day, 07/17/2012.

On 07/17/2012, Defendant granted the loan on terms, no interest, no payment and no time frame.

Keith Williams took possession of the Plaintiff's unsigned-title and signed, but not witnessed at the time promissory note, and gave the Plaintiff an envelope of money in the amount of \$3K, from Mr. James Neubia 07/17/2012.

Defendant alleged that he wants his money back and was told by a third party to just take out papers with the court and get his money back, a year and some odd months later 09/11/2013.

Defendant agreed to wait for his money, and delayed his own repayment 11/2013.

1 Defendant allegedly forged plaintiff's name on her title and a form  
2 400 in order to falsely acquire a lien against her title with the  
3 SCDMV, on or about 07/17/2012.

4 Defendant acquired the lien without the Plaintiff's approval or  
5 signatures, and did so, somehow at the DMV with the documentation  
6 dated a year after the fact.

7 Defendant tried to file civil papers but did not complete the  
8 process on 11/05/2013.

9 Defendant had a key made to plaintiff's car, after acquiring a lien  
10 against the title, by alleged forgery.

11 Defendant stated on tape that he acquired Plaintiff's car off of  
12 Church property, while she was at service. By calling into the  
13 Anderson County Dispatch line Defendant stated he was coming to repo  
14 a car. Per the call with Anderson County Dispatch, the callers  
15 stated: "A week ago I told them I was gone repossess a car in down  
16 here in Belton. Police told me to go ahead and get it, don't get  
17 in no confrontation or anything, since my name is on the title and  
18 everything. If they call it in stolen, It aint stolen, I got it.  
19 The Judge in Belton, told me to go ahead and put it in my name. If  
20 she want to do something about it, let her take you to court". Tape  
21 acquired 03/20/2014, caller at the Anderson County EMS, was a  
22 DKelley. Tape acquired-(03/16/2009). Date of the call  
23 (03/09/2014).

24 The Anderson County Dispatcher, never asked if the Defendants paper  
25 work was in order. Call received at 12:34.48.8 on 3/9/2014.  
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1  
2 Anderson County Dispatcher, forwarded the message to the Belton,  
3 City Police Department and they gave the authority to the caller to  
4 come and get the car, without validating his paperwork or notifying  
5 the plaintiff of the call and or the coming action.

6 Plaintiff reported car stolen to the Belton City Police Department  
7 03/09/2014 at 1:45 PM.

8  
9 Plaintiff asked Belton City Police Department to file a theft  
10 report.

11 Belton, city Police Department refused to file a theft report, they  
12 declared the car repoed 03/09/2014 and told the same to Plaintiff's  
13 claim representative at State Farm, as well as the SCDMV Inspector  
14 General's office, Ms. Betty Pitts.

15  
16 Plaintiff finally received an incident report from the Belton City  
17 Police department, on 03/10/2014., it was not from the Officer that  
18 took the call it was vague and only about the repo, does not detail  
19 anything in relation to the call or the meeting at the police  
20 department the weeks prior to the event, or even the information  
21 they obtained from Judge Madison, on how the Defendant came in with  
22 the claim and delivery papers from another county. In addition to  
23 being vague and evasive as well as incomplete, not to have the  
24 information of the third party that had or has the Plaintiff's car  
25 parked at her house.

26  
27 Belton City Police Department, PFC Gray filed an incident report as  
28 a repo.

1 Belton City Police Department, PFC Gray spoke with the family co-  
2 Co-conspirator about the paperwork, (family co-conspirator, stated  
3 she left the paperwork at home and that the car was parked at her  
4 house.

5 Belton City Police Officer, PFC Gray called the Anderson County  
6 Dispatcher to see if a repo order was out for the car in Anderson  
7 County, the Dispatcher, said negative (03/09/2014) between 1:45 and  
8 2:30 p.m., over the radio and the responder on the other end,  
9 stated: "negative, no repo orders for the City of Belton, SC".

10 Plaintiff spoke at length with Sergeant Gray, inquiring about the  
11 officer that took the call from the AC Dispatcher, in an attempt to  
12 get as much information as possible. Sergeant Lowe the first officer  
13 to respond to the alleged theft, handed Plaintiff a handwritten note  
14 off a pad, with the message on it as follows: GTS INDUSTRIAL  
15 SUPPLY...ETC. (James Neubia 864-346-7691. Brown 2009 Honda CRV  
16 IFE485. Sergeant Lowe, told Plaintiff, the person with the  
17 name on the piece of paper came and repo-ed the car.

18 Plaintiff asked Sergeant Gray, the second officer to get involved  
19 With the matter, "where is the paperwork that allowed him to come  
20 And take the car off of private property, and out of this County?  
21 Sergeant Gray replied:

22 "He showed the paper work to someone in the Police Department and  
23 stated that he had the claim and delivery papers to be able to take  
24 the car, and told Plaintiff, that he had no further information to  
25 provide, call the  
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1 Defendant directly".

2 Plaintiff, then called a police officer that attends her church,  
3 Israel Hollister, an Officer with Greenville County Sheriff's  
4 Department, and told him what had happened, and asked him did he  
5 Hear of anything or see anything on the Church parking lot at that  
6 time, since an individual saw him go outside around the time in  
7 question? and Plaintiff was told by this individual (Izzie) that it  
8 appeared to him, that the person that took the car, had to have a  
9 key.  
10

11 Plaintiff told the officer at her church (Izzie), that the person  
12 that took her car, took all of her belongings and medicine.

13 PFC Gray showed up at Plaintiff's residence within minutes of this  
14 call to her Church member; to tell her that he came with along with  
15 the Individual that took her car, so that her belongings and  
16 medicine could be returned to her.  
17

18 PFC Gray stated to Plaintiff, that he was just there to keep the  
19 peace.

20 Plaintiff, asked PFC Gray to get the name and other details of  
21 address etc., from the family co-conspirator.  
22

23 PFC Gray an Officer, with the Belton City Police Department, did not  
24 get any information for the family co-conspirator and allowed her to  
25 leave the premises, knowing, she was in possession of Plaintiff's  
26 car.

27 PFC Gray, with the Belton City Police Department spoke with  
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1 Plaintiff further at length in front of witnesses and told her, that  
2 "the whole situation seemed shady to him".

3 PFC Gray, called the Officer on duty at the time, to see if anyone  
4 had details about the call that came in, the party on the other end  
5 of the two way conversation (via -radio) stated:

6 "Defendant(s) had come down two (2) weeks prior to the repo and  
7 showed his paperwork to someone in the Belton City Police  
8 Department, and then to Judge Madison".  
9

10 PFC Gray told Plaintiff to call Judge Madison in the morning for  
11 more details on the visit to Anderson County Authorities, and about  
12 the visit by Defendant(s) to her office, to show his paper work,  
13 from Greenville County.

14 Plaintiff called Judge Madison and asked for more details on the  
15 visit by the Defendant(s).  
16

17 Judge Madison told Plaintiff, that the "Defendant came down and  
18 showed paper work from another County and she, informed Defendant(s)  
19 that his paperwork was not enforceable in Anderson County".

20 Judge Madison told Plaintiff, that the "Defendant immediately  
21 started claim and delivery paperwork in her office and once she had  
22 just about completed them, he decided not to pursue the matter, with  
23 claim and delivery papers for Anderson County, and then told the  
24 Judge that "we will handle the situation on our own".  
25

26 Plaintiff began her own investigation on 03/10/2014, with a call to  
27 Chief Clamp at the Belton City Police Department, by asking him to  
28 get a report from the three officers involved, beginning with the

1 Officer that took the initial phone call.

2 Belton City Police Department, Chief Clamp consistently told  
3 Plaintiff that the case was a civil matter and they could not get a  
4 warrant for theft because neither Judge Madison or Judge Murphy  
5 deemed the matter to be of a criminal nature.

6 Belton City Police Department, Chief Clamp adamantly told Plaintiff,  
7 "both Judge Madison and Judge Murphy would not grant a warrant, they  
8 deemed the matter to be a civil case and the only way to pursue the  
9 return of Plaintiff's car was to get an Attorney to file a civil  
10 case with the court".  
11

12 Plaintiff reported car stolen to State Farm Claims on 03/09/2014.  
13 State farm, made three (3) phone calls in regards to the claim: one  
14 call to the Belton City Police department, One call to Anderson  
15 County Dispatch and one call to Defendant (James E. Neubia) to see  
16 if he would provide the paperwork, that he used to (so-called) repo  
17 Plaintiff's car?.

18  
19 State Farm Claims Officer (Tracie Mintz) called James Neubia to get  
20 a copy of the Promissory note sent to them?

21 Defendant James E. Neubia refused and Replied: "why are you even  
22 Involved?"

23  
24 State Farm Claims Officer Tracy Mintz, called Anderson County  
25 Dispatch to see if the recording of the call could be expedited?  
26 Anderson County Dispatch Officer replied-they had 15 days to comply  
27 with the FOIA, submitted by Plaintiff, to release the recording of  
28

1 the call. First AC Dispatch Office stated: "we have no record of  
2 the call".

3 State Farm Claims representative called and spoke with Keith  
4 Williams about the incident and was informed that the matter was a  
5 contract dispute, issue between the Parties.

6 State Farm Claims representative, Tracie Mintz, told Plaintiff that  
7 the research and the information she had supplied to the Insurance  
8 Company was going against her, and that the recommendation of the  
9 Complex claim, per advise would be: denied based on the Plaintiff,  
10 not being the owner of the car, at the time of the loss.

11 Statefarm confirmed this statement with a letter dated March 12,  
12 2014, in regards to the ownership of the vehicle at the time of the  
13 incident, but the letter asked for additional information in order  
14 to keep from denying the claim.

15 Plaintiff spoke with the Manager of Tracy Mintz, (Ms. Kimberly  
16 Newton) in complex Claims and was told by her, not to give up, but  
17 to try and redeem or recover the Promissory note, in regards to the  
18 lien, Mr. Neubia placed against the title.

19 Plaintiff filed a fraud complaint with the SCDMV, against the title,  
20 in order to find out how defendant was able to take Plaintiff's car,  
21 on 03/19/2014.

22 SCDMV- Inspector General's Office sent off a request for a title  
23 history.

24 Plaintiff had to acquire a full history of her title from the SCDMV  
25 in order to figure it out what happened (03/10/2014).

1 Plaintiff received her title history, verified that there was a  
2 forgery & fraud of her signature and sent the original certified  
3 copies of from the SCDMV via United Parcel service to State Farm  
4 Claims Duluth GA. (Tracking number A3798231063, on 04/04/2014.)  
5 State Farms signed for the package on 04/05/2014 and then allegedly  
6 lost the package.

7 Plaintiff called State Farms Claim Representative, Tracy Mintz daily  
8 on the Progress of the claim and was told the package was never  
9 received even as of 04/11/2014.

10 Plaintiff spoke with State Farm Corporate Offices of Complaints and  
11 was told the package was successfully received and scanned into the  
12 system on 04/09/2014, and told Plaintiff "they saw no reason for  
13 anyone to state that the documents had not arrived or been  
14 processed".

15 State Farms Claim Representative Tracy Mintz was out of touch with  
16 this case #40421W116 from the beginning and negligent in her duties  
17 to investigate the claim fully.

18 State Farms Claim Representative Tracy Mintz, was negligent in her  
19 ability to decipher the documentation provided and was determined  
20 either way to find a reason to deny, Plaintiff's claim.

21 Defendant is still in possession of Plaintiff's car since 3/9/2014.

22 Defendant(s) niece told police her uncle had her to enter  
23 Plaintiff's car and remove some of her private belongings.

24 Family co-conspirator also told PFC Gray that she needed to have  
25 an officer to meet with her so she could drop them off at  
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1 Plaintiff's home; to ease the transition of being able to return  
2 the Plaintiff's belongings that were left in the car, due to the  
3 fact that the car was now parked at her house at the time of this  
4 incident.

5 Defendant did not send a right to cure, because he did not have a  
6 valid court case.

7 No Judge in any court has ruled the Promissory note in default.

8 Defendant did not send a right to redeem, even until today.

9 Defendant(s) allegedly committed forgery, on a State Document, at a  
10 State Facility.

11 Defendant(s) allegedly committed fraud, on State Documents, at a  
12 State Facility.

13 Defendant(s) did with intent act in bad faith, lied to the police,  
14 lied stating Judge(s) gave him the authority to come and get the  
15 car, across County lines.

16 Defendant did not have a judicial order for Anderson County and the  
17 claim and delivery papers, that he stated were in force from  
18 Greenville County, had no judicial authority in either county and  
19 also had been disposed of by the court.

20 Defendant(s) did not have judicial authority, at all, to commit  
21 fraud, forgery or theft, as well as a wrongful claim and delivery.

22 Defendant told the local police department he had the proper  
23 paperwork to repossess a car. Defendant intentionally lied.

24 Defendant lied numerous times, on record, first to Anderson County  
25 Dispatch, next to Belton City Police Department, next to regarding  
26

1 judicial authority and finally, by proof of a fax to the SCDMV and  
2 finally to the SC Officer of Consumer Finance Division by stating he  
3 has only loaned money to one individual in the State of SC.

4 Defendant did these things with intent to commit, fraud, alleged  
5 forgery and Breach of Trust.

6 A hand writing analysis can plainly reveal, the signatures on the  
7 form 400 and the title that was voided by the DMV are not  
8 Plaintiff's signatures.  
9

10 The Defendant had help to commit this alleged forgery; fraud and  
11 theft at the SCDMV, by whomever impersonated me to get the lien  
12 posted against the title without my actual appearance at the SCDMV.  
13 Defendant's family co-conspirator assisted with the returning of  
14 plaintiff's property, by illegal entry into her car, with a key,  
15 illegally made or acquired by the defendant(s).  
16

17 Belton City Police Officer Mr. Gray, met with the individual  
18 Family-co-conspirator) at the Fred's on River Street, before showing  
19 up at Plaintiff's house to return her belongings.

20 Plaintiff asked the officer (PFC Gray) to make a detailed report and  
21 yet; the only report the Belton City would make, was an incident  
22 report as a repo, even today, due to their own inefficiency and  
23 ability to further investigate this matter.  
24

25 Defendant used Anderson County Dispatch to report the alleged  
26 wrongful taking of Plaintiff's car, and yet Anderson County stated  
27 they don't get involved in repos.  
28

1 If this is the case, and they don't get involved with repos, then  
2 Plaintiff would like to know, why did they get involved on the date  
3 In question, regarding this issue and this car?

4 Belton City Police Department stated they don't get involved with  
5 repo's either, but accompanied this inquiry as officers of the  
6 peace. In rebuttal to this reply: Someone in the Belton City  
7 Police Department, inadvertently was negligent in telling, the  
8 Defendant to come and take Plaintiff's car, without validating the  
9 validity of the paperwork and the enforceability of said paperwork.  
10 Plaintiff continuously asked Belton City Police Department to get  
11 more information, on the event, especially after finding out there  
12 was no repo order for Anderson County, SC and that the Judge (Horace  
13 Butler's office) in Greenville County stated there was no valid  
14 claim and delivery.  
15

16 Belton City Police Department is negligent, in that this public  
17 servant(s) office, has failed to do anything, but state that nothing  
18 criminal was done, only civil.  
19

20 Defendant used the chain of command as a car dealer would, to get  
21 local law enforcement involved, to aid in him taking plaintiff's car  
22 off private property. Plaintiff believes the help came from Keith  
23 Williams, a well known car dealer in Greenville County.  
24

25 Defendant took the car from a Church (206 Zion Street. Belton, SC.  
26 29627), on a Sunday (03/09/2014) between the hours of 12:00 noon and  
27 1:45 pm., a morning, during worship service.  
28

1 Plaintiff, came outside from church ready to go home and noticed her  
2 car was not in the parking lot.

3 By Defendant's own admission via the phone call to Anderson County,  
4 he did not know the name of the Church and did not know the address  
5 of the Church.

6 Plaintiff, believes he obtained the information from Keith Williams,  
7 Because he used to attend the same church and knew that the  
8 Plaintiff was a member. Keith Williams also knew the location of  
9 the Church.  
10

11 Defendant recently told the investigator from the South Carolina  
12 Consumer Finance Divison, in response as to how did he get the car?  
13 Defendant stated, that he staked the church out for a month waiting  
14 for the car to show up, on the parking lot and then one day it did.

15 This poor error in judgment, clearly shows, Defendant was not a  
16 member or an attendant of said church (Mt. Zion Baptist Church- 206  
17 Zion Street. Belton, SC. 29627., and that he had no right to be on  
18 this private property, if he was not there for worship service.  
19

20 Plaintiff had to get a ride home for her and her mother and other  
21 passengers that rode to church with her, that day.

22 Defendant does not attend this church, nor has he ever.

23 Defendant allegedly and did with intent falsely acquire Plaintiff's  
24 car and has it hidden or camouflaged across county lines.  
25

26 Defendant immediately turned in Plaintiff's tag, in an attempt to  
27 keep her car.  
28

1 Defendant had a key made to Plaintiff's car under false pretense of  
2 ownership, by having someone go with him to the DMV.

3 According to the SCDMV Office of the Executor, someone had to  
4 pretend they were the Plaintiff, in order to complete a TEA-1 (Rev.  
5 6/10)-Title Reassignment Error Acknowledgement, so that lien could  
6 be place on The title that day.

7 However the lien was placed on the title the same day 07/17/2012,  
8 and the error acknowledgement form was not completed until a year  
9 and a couple of months later.

10 The document from the DMV is dated 09/11/2013 and yet the DMV put  
11 the lien against the title 07/17/2012, without the proper paperwork.

12 SCDMV realized a problem and voided the title on 07/17/2012, but  
13 still allowed the lien to be placed that day and remain.

14 Per the Executive Office of The SCDMV, I personally would have had  
15 to be present in order for the Defendant's lien to be placed.

16 Due to the title reassignment error, being recorded a year and some  
17 odd months later, the title the Defendant has should be immediately  
18 construed as invalid and void.

19 Plaintiff, wasn't present, I did not authorize the lien and I would  
20 Have, had to not only agree to lien, I would have had to be with  
21 him, when the acknowledgement form was initiated, completed and  
22 enforced. (Someone impersonated me at the SCDMV).

23 Yet the SCDMV reissued my title to the defendant, showing him as  
24 a lien holder, on that date of 07/17/2012.  
25  
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1 The SCDMV allowed the Defendant to put the following statement in  
2 writing and used it as a lien against the title one full year later.

3 "I, James Edward Neubia never took possession of a 2009 Honda Serial  
4 #5J6RE38359L013972 but loaned this lady Bridgette Tara Neal money.

5 I want to put my loan (record) so I can get paid for it, Sincerely,  
6 James Neubia" clearly dated: September 11, 2013).

7 I did not add anything miss-spells are per the statement submitted  
8 by the Defendant.

9  
10 Plaintiff involved the SC Department of Consumer Affairs, on  
11 03/11/2014 they stated (Consumer Affairs) that this case is out of  
12 their jurisdiction 04/08/2014, they think.

13 SC Department of Consumer Affairs, forwarded the complaint to the SC  
14 Department of Consumer Finance (State Board of Financial  
15 Institutions C/O Mr. Jim Copeland, who is investigating the matter  
16 and the paperwork of all parties involved, under a  
17 Title 37 violation on 04/08/2014.

18 Mr. Copeland's office assigned Mr. Ron Guzzleman as the investigator  
19 of the matter. Mr. Guzzelman is completing a detailed report and  
20 sending a copy to Plaintiff for her case.

21 Plaintiff has filed the necessary documents with the Inspector  
22 General's Office of the SCDMV and they in turn have forward the  
23 documentation to SLED 03/10/2014.

24 An actual controversy has arisen and now exists between plaintiff  
25 and defendant concerning their respective rights and duties in that  
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1 Plaintiff contends defendant allegedly did the following: stole  
2 Plaintiff's car; forged her signature (or knows who did), lied to  
3 law enforcement, had no judicial authority and did so with intent  
4 even after the fact try to mislead Authorities.

5 Defendant faxed a receipt for a claim and delivery case he filed in  
6 the wrong county to the Office of Inspector General to make them  
7 think he had the authority to take Plaintiff's car. By so doing;  
8 committed an act of fraud by facsimile, as the document is time  
9 stamped and dated after the disposing of the case, in that  
10 particular Magistrates court in a county with no authority to decide  
11 the matter.  
12

13 Plaintiff spoke at length with the office of Judge Horace Butler's  
14 aid, (Silvia) in Greenville South Carolina about the claim and  
15 delivery, papers validity and was told by Silvia in Judge Horace  
16 Butler's office that the case, was Inactive Due to the defendant not  
17 providing the necessary documentation on the case to proceed.  
18

19 Silvia also, told Plaintiff, that the car was over the dollar amount  
20 for Magistrate Court and Judge Butler had no authority to pursue the  
21 matter further, because the case was out of his jurisdiction.  
22

23 Plaintiff told Judge Horace Butler's office that the Defendant  
24 James E. Neubia used his incomplete paperwork to come across county  
25 lines and repo her car ("I say steal my car").

26 Silvia in Judge Butler's office was astonished and stated "that he  
27 could not use that paperwork for any reason, due to the fact he  
28 never came back to the court to proceed with the matter", Silvia

1 immediately disposed of the case while Plaintiff was on the phone  
2 with her and provided her a copy of the disposal via fax 03/18/2014  
3 at 10:34 a.m. from the fax number: 864-277-4376.

4 Silvia in Judge Butler's office also stated, that the Defendant  
5 could never use Greenville County Paperwork, anyway in Anderson  
6 County.

7 Defendant went to the SC State DMV and did in fact have Plaintiff's  
8 Title invalidated and a new title issued with him as the lien holder  
9 and did so with intent to commit forgery, fraud and breach of trust  
10 and without the knowledge, consent and or signatures of the  
11 Plaintiff.  
12

13 Now, the SCDMV has invalidated the entire title and stated Plaintiff  
14 will need a court order to revoke the title and reissue her a new  
15 Title, so she can redeem her car.

16 Plaintiff's insurance company has continued to deny her a rental  
17 car, stating that, the Belton City Police Department put down a repo  
18 and not a theft, and yet there is and never was an actual repo.  
19 State Farm Claims is negligent in their findings due to the  
20 inability to decipher the paper work from the DMV, and investigate  
21 this claim on their own.  
22

23 Plaintiff, did her own investigation and copied, State Farm Claims  
24 on her findings. State farm Claims continue to say Plaintiff does  
25 not own her car. Yet, the SCDMV clearly shows her as the owner of  
26 record.  
27

28 Forgery and fraud of a title, should invalidate any lien and as a

1 client of State Farm they, have Plaintiff's signatures on her  
2 documents and should be able to have a hand writing expert decipher  
3 thoses documents. Instead, State Farm Claims, insist on asking  
4 Plaintiff to get the Belton Police Department to do a theft report,  
5 or have the current investigator, say it was a theft, before they  
6 will consider Plaintiff having a valid claim. Plaintiff has already  
7 done a thourough investigation and believes State Farm Claims, will  
8 still find a way to deny the claim. Plaintiff is exhausted with her  
9 Insurance Company and feels abandoned by them, in her time of need.  
10 SCDMV granting Defendant a title should be construed as negligence,  
11 there is clear error with the title. It should be immediatly voided  
12 and reissued to Plaintiff and Defendant(s) actions turned over to  
13 SLED for prosecution.

14  
15 Belton City Police Department has failed to act, and should be  
16 construed as negligence on so many levels and areas of law and  
17 justice.  
18

19 Keith Williams releasing the Plaintiff's title, should be construed  
20 as negligence, he should still be holding the Plaintiff's title in  
21 trust and unsigned by the Plaintiff as it was when he took  
22 possession of it. Keith Williams, as a mediator of this transaction  
23 should be construed as negligent for his breach of fiduciary duty  
24 to both parties trust.  
25

26 Anderson County Dispatcher that took the call should be construed as  
27 negligence, as this individual (D.Kelley) should have asked if he  
28 the caller if was a dealer, and if his paperwork was in order, if

1 so?, be ready to show it to local law enforcement before attempting  
2 to take possession of someone's vehicle in Anderson County.

3 Defendant allegedly committed all that is alleged in the complaint;  
4 in addition to lying to officers, and a judge claiming he had  
5 authentic claim and delivery papers, whereas defendant cannot  
6 dispute these contentions.

7 Defendant(s) allegedly acted in bad faith on so many counts and  
8 did so with negligence, throughout the Plaintiff's process of  
9 trying to get the proper answers and help in resolving this  
10 dilemma, whereas defendant cannot dispute these contentions.

11 Plaintiff, Allege financial and other burdens now being suffered by  
12 these unsettled state of affairs due to a Wrongful Claim and  
13 Delivery, and undecided contract default by a Judicial authority or  
14 Justice of the Peace.

15 Plaintiff, alleges detriment and damages incurred and damages must  
16 be immediately granted.

17 Plaintiff has lost business due to the loss of her car.

18 Plaintiff, alleges exhaustion of administrative remedies, all of the  
19 State offices in Authority she has turned to, state they have no  
20 jurisdiction.

21 Plaintiff, alleges property damage to her car, starting at 4k.

22 Plaintiff, alleges mental, physical and emotional distress added to  
23 the disability she already suffers as debilitating migraines.

1 The venue is proper; Plaintiff is a resident of Anderson County  
2 And is requesting, the long arm of authority in this issue be  
3 Immediately enforced.

4 The case is a clear Denial of Plaintiff's Property.

5 The case is a clear act of wrongful claim and delivery, forgery,  
6 Breach of Trust, fraud, bad faith acts and torts of trespass and  
7 chattel.

8 Defendant has committed numerous torts as stated in this complaint.  
9

10 **RELIEF SOUGHT**

11 Plaintiff's claims are with merits of intent. The injuries the  
12 Plaintiff sustained is results of maliciousness. Plaintiff never  
13 agreed to any liens against her property. In the event, Plaintiff was  
14 in agreement, the lien would not have been placed a full year later.  
15 Plaintiff claims, an additional verbal agreement to the first exist,  
16 via a taped recording of the conversation.  
17

18 Plaintiff's car is valued at over 18k.

19 Plaintiff, has acted in good faith, to even consider allowing the  
20 title to be held by a third party in trust, just in case of the first  
21 deal not completing.

22 Plaintiff seeks the immediate return of her car, and validation by  
23 Honda that it has all the original parts, a new ignition and a new  
24 remote key entry system.  
25  
26  
27  
28

1 In addition; Plaintiff seeks immediate monetary damages, caused by  
2 damage to her car, extensive economic hardship damages, economic loss,  
3 mental, physical and emotional stress in damages, due to this alleged  
4 theft, as well as a loss to business income in the damages.

5 Plaintiff was granted special permission by the Disability Court to  
6 attempt to make a living and function with her disability, to regain  
7 her independence, and try and do the same job or similar jobs in  
8 nature to earn a living.

9 Defendant's intent and malicious action is negligence by wrongful  
10 claim and delivery, alleged forgery, fraud, breach of trust and the  
11 other complaints of damages and torts, herein set forth throughout the  
12 complaint.

13 **Relief Sought**

14 For the reason stated above, Plaintiff's seeks immediate return  
15 of her car, the title and all of the keys Defendant(s) James Edward  
16 Neubia, and other Family member co-conspirators, had made to the car.  
17 Plaintiff desires a judicial determination of exclusive and  
18 totalitarian rights and duties, and a declaration as to the immediate  
19 return of her car. Plaintiff requests, that all of the keys Defendant  
20 had made to the car be surrendered to her along with, all of the books  
21 in the car that have the information regarding the vehicle, and the  
22 thirty (\$30.00) that was in the sunglass compartment of the car.  
23 Plaintiff, request that the title granted Defendant on the basis of  
24 alleged forgery by signature and fraud, by the SCDMV be immediately  
25 voided and that the Defendant (James E. Neubia) be immediately ordered  
26 to surrender the Plaintiff's car, be further arrested and questioned  
27 and held in Anderson County about the events that led up to this title  
28 being reissued with him as the lien holder.

1 Plaintiff, also ask that Keith Williams be held for questioning by the  
2 local authorities as well on the matter of the title forgery, fraud,  
3 breach of trust and other torts, alleged in the complaint.

4 Specifically, did Keith Williams tell James Neubia, what church  
5 Plaintiff attends and the location?

6 Plaintiff, ask the court to have the defendant immediately give the  
7 court clerk a cashier's check in the amount of four thousand (\$4,000)  
8 for the Plaintiff, as in part-restitution to complete and repair the  
9 damage to her car, as an in-part assessment of the noticeable damages  
10 (Need of a New Ignition, New keys and New locks on the doors).

11 Plaintiff may ask for more financial relief, once the car is  
12 thoroughly examined by Honda for all of its original parts or a  
13 certified Honda Dealer. Since the car in question was never out of  
14 the sight of Plaintiff, until wrongfully taken by this illegal claim  
15 and delivery and withheld by the defendant, Plaintiff, needs  
16 validation that the car has all of its original parts and features.  
17 Plaintiff will use the money to have the ignition and remote entry  
18 keys and unlock features, completely redone by the Honda Dealership or  
19 a dealership of Plaintiff's choosing.

20 Plaintiff, request that no bail be granted to either Defendant(s)  
21 James Neubia, and Keith Williams, and other family co-conspirator,  
22 until certified funds are verified and or cashed.

23 A judicial declaration is necessary and appropriate at this time under  
24 the circumstances in order that plaintiff may ascertain her exclusive  
25 rights and duties as the sole owner of a 2009 Honda CRV,  
26 VIN#5J6RE38359L013972.

27 Plaintiff seeks Damages of Injunctive and Declaratory relief in the  
28 amount of \$250,000.00, each from Defendant(s). Neubia & Williams.

1 Plaintiff ask that the entire matter be investigated further, the  
2 Belton City Police Department's actions, SCDMV's Paperwork error,  
3 State Farms Negligence and Keith Williams extensive involvement and  
4 coaching of James Neubia in the retrieval and taking of Plaintiff's  
5 car.

6 Plaintiff believes, Keith Williams told Defendant James Neubia, what  
7 Church she attended because he used to attend the same church.

8 Plaintiff believes the Keith Williams told James Neubia how to take  
9 the Plaintiff's car.

10 Keith Williams had extensive Knowledge of how to repo a car; as a  
11 dealer and had to coerce Defendant James Neubia as to the use of the  
12 chain of command, a dealer would use, to repo a car with the help of  
13 local law enforcement, in Plaintiff's opinion.

14 Plaintiff believes that Keith Williams was totally instrumental in the  
15 alleged theft of her 2009 Honda CRV, VIN#5J6RE38359L013972, with the  
16 Defendant(s), James Neubia and family co-conspirator.

17 Defendant(s) caused extensive economic hardship, economic loss, and  
18 stress from loss of transportation, mental, physical and emotional  
19 stress.

20 Plaintiff seeks an immediate order of protection from future trespass  
21 against her or her property at the hands of the Defendant(s) James  
22 Edward Neubia & other Family member co-conspirators of the Defendant.

23 Plaintiff seeks an additional declaratory judgment against the  
24 plaintiff(s) in the amount of \$250, 0000, for emotional stress.

25 Plaintiff's relief should be immediately granted, in the amount of  
26 \$500,000.00., between Defendant(s) James Neubia, & Keith Williams.

27 Plaintiff also seeks a declaratory judgment of \$100,000.00 from State  
28 Farm for the inability to do investigative work in regards to complex

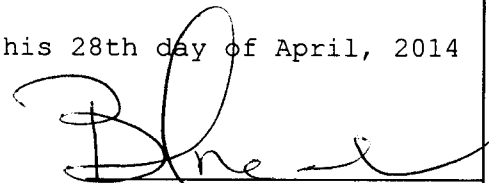
1 claims, without the help of their insured's. Also, that Tracie Mintz  
2 a complex claims representative be reassigned to another area, for  
3 failure to do her job properly in this matter.

4 Plaintiff seeks damages from SCDMV in the form of a new title, as it  
5 was originally, with her name only and no liens.

6 Plaintiff seeks damages from the Belton City Police Department in the  
7 form of an injunction; regarding further matters against Plaintiff,  
8 without the proper paper work and evidence and a public apology in  
9 writing, on this issue and no further police involvement, in any repo,  
10 in the City of Belton, without the proper paperwork.

11 Plaintiff seeks a declaratory judgment on this issue regarding the  
12 Anderson County EMS Dispatch Officer that took the initial call in the  
13 form of a reprimand in her permanent record and a public apology.

14  
15 Dated this 28th day of April, 2014



16  
17 Bridgette Neal-Prose  
18 312 Green Street  
19 Belton, SC. 29627  
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22  
23  
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28

VERIFICATION

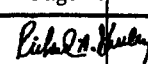
1  
2 I, Bridgette Tara Neal the Plaintiff, I am an individual and a small  
3 business owner that lives in Anderson County. I am the only  
4 Plaintiff, in the above-entitled action. I have read the foregoing  
5 statements and facts and know the contents thereof.

6 The same is true of my own knowledge, except as to those matters which  
7 are therein alleged on information and belief, and as to those  
8 matters, I believe it to be true.

9 I declare under penalty of perjury that the foregoing is true and  
10 correct and that this declaration was executed at Anderson County,  
11 City of Belton South Carolina.  
12

13  
14   
15  
16 Bridgette T. Neal

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STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF ANDERSON )  
 )  
 BRIDGETTE TARA NEAL )  
 \_\_\_\_\_ )  
 Plaintiff, )  
 vs. )  
 JAMES E. NEUBIA-FAMILY CO CONSPIRATOR, KEITH WILLIAMS, STATE FARM CLAIMS, BELTON CITY POLICE DEPARTMENT AND ANDERSON COUNTY EMS-DISPATCH )  
 \_\_\_\_\_ )  
 Defendant. )

IN THE COURT OF COMMON PLEAS  
 10<sup>TH</sup> JUDICIAL CIRCUIT

CERTIFICATE OF SERVICE  
**RECEIVED**

OCT 01 2014

Case No.: 2014-CP-04-01045

**SC Court of Appeals**

I certify that on this date, I served a copy of A CIVIL ACTION OF ALLEGED FORGERY, FRAUD, BREACH OF TRUST, TRESPASS, CHATTELS, AND OTHER TORTS in this action, dated

5/2014, on 5/23/2014 by

- Delivering it to him/her personally;
- Mailing it to him/her, at his/her last known address, by depositing it in the U.S.

Mail, in an envelope with sufficient postage affixed, addressed as follows:

Delivering it by commercial delivery service in accordance with Rule 4(d)(9), SCRPC, addressed as follows: ; or,

Other:

5/23/14  
 \_\_\_\_\_  
 Date

*B. Neal*  
 \_\_\_\_\_  
 Signature

**A TRUE COPY**  
 MAY 23 2014  
*Richard A. Huber*  
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Columbia, SC 29211

**RECEIVED**

OCT 01 2014

**SC Court of Appeals**

Case No. 2014-002017

