



STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

The Honorable Doyet A. Early, III Circuit Court Judge

**RECEIVED**

NOV 05 2014

Appellate Case No. 2013-002582

**SC Court of Appeals**

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

v.

Albert H. Dallas and others, ..... Defendants.

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

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

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

IN RE:

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

**RETURN AND OBJECTION TO MOTION OF ALBERT H. DALLAS  
FOR COSTS**

Appellant respectfully objects to the Motion for Costs of Eugene C.

Covington, served October 31, 2014, on behalf of Respondent Albert H. Dallas for one, more or all of the following reasons:

1. Respondent Dallas is not the prevailing party.
2. Mr. Covington, on information and belief, performed no services in this appeal; was engaged by Mr. Dallas's Bankruptcy Trustee to attempt to recover Mr. Dallas's \$6 million PR/Trustee commission from the Estate of James Brown; and, although a necessary party, was not required to file any responses.
3. Respondent Dallas did not seek dismissal of this appeal; has not filed a brief in S. C. Court of Appeals Case 2013-001649; and, as such, has supported the Statement of the Case in that appeal.
4. Although a witness in Richland County Case 2010-CP-40-4900 (Case 4900) for Respondents Hynie and others, Mr. Dallas has given sworn testimony in Case 4900 to support the position of Appellant, namely:
  - a. Respondent Hynie was not Brown's spouse;
  - b. The \$4.7 million valuation of Russell Bauknight supported by the Attorney General, is incorrect.
  - c. Brown's 2000 estate plan is valid, as is his 1999 backup Will.
5. While Dallas has properly advocated for Brown's estate plan, he has covered up more than \$12 million taken from by Respondent David Cannon from funds Brown gave to his "I Feel Good" Foundation for needy students.
6. Mr. Covington, on information and belief, was engaged by the Federal Bankruptcy Trustee for Mr. Dallas to pursue a \$6 million commission claim, and NOT to protect the "I Feel Good" Trust, Brown's estate plan.
7. The Estate has represented to the Federal Bankruptcy Court in the Dallas Banruptcy that all PR commissions related to James Brown must be determined in the same proceeding, making it necessary for Appellant to have named Mr. Dallas because his \$6 million claim and her much smaller unpaid PR/Trustee

commission both remain unpaid.

8. Mr. Dallas has not yet paid the costs of his own dismissed appeal and the underlying Aiken County Case 2007-CP-02-0122, even though ordered to do so by Order of the Honorable Doyet A. Early, III, dated April 8, 2008.
9. Mr. Dallas has unclean hands, including helping cover up the \$13+ million Respondent David Cannon took from funds James Brown gave the "I Feel Good" Trust.
10. A motion to require Mr. Dallas to pay the costs of his July 2009 interference in the Estate's Christie's sale in accordance with the February 20 and April 1, 2008 Orders of the Honorable Doyet A. Early, III is still pending.
11. The brief of Appellant and Record on Appeal (ROA) in Case 2013-001649, as well as undisputed matters of which the Court is asked to take judicial notice under Rule 205 (d) SCRE, show that it would be manifestly unjust to require Appellant to make any payment to Respondent Dallas or his counsel.
12. Appellant has served *pro bono publico* since May 8, 2013 to help enforce Brown's "I Feel Good" Foundation, while Mr. Dallas appears to have recently started working against it.
13. The mediation being scheduled in Richland County Case 4900 by the Honorable Doyet A. Early, III and the Honorable L. Casey Manning, on information and belief, will break the logjam caused by this 4 1/2-year-old suit brought by the Attorney General, the Attorney General's Legacy Trust, Ms. Hynie and others.
14. Actions pending in Aiken County show that Mr. Bauknight, with others, materially misrepresented to the Appellate Court both the heirs of James Brown; the value of James Brown's assets; and
15. The mediation being scheduled, as shown on Exhibits A and B, will address why Mr. Bauknight has failed to collect the court-ordered costs of Case 122 from Mr. Dallas; Mr. Dallas' coverup of Mr. Cannon's takings; and the \$3 million annual understatement of Brown's income on his tax returns for more than 5 years before Brown's death.

Appellant asks that in denying Mr. Dallas's fee request the Court take into account that Appellant is being sued by the Attorney General, Respondent Hynie and others in a lawsuit the South Carolina Supreme Court directed them in February 2013 to address in the "first instance;" the Estate/2000 Trust continues to attempt to intervene FOIA suits which the Supreme Court directed by addressed in the first instance; Appellant has not been fully paid for her 2007 special administrator service to James Brown's estate; and Appellant has not been paid any of her court-ordered PR/Trustee commissions for 2007- May 26, 2009, or any costs of the appeal in *Wilson v. Dallas*, 403 S.C. 411, 743 S.E.2d 746 (2013) except Court-ordered costs by the Supreme Court. In addition to having shouldered most of the costs of the *Wilson v. Dallas* appeal, and having had to defend herself in a lawsuit by the Attorney General and Respondent Hynie for 4 ½ years, Appellant has worked *pro bono publico* since May 8, 2013 to help prevent a second announced plan to dismember the "I Feel Good" Foundation again.

The facts on which this Return and Opposition are fully supported within the record, and include:

- a. For seven years before the death of entertainer James Brown Respondent David Cannon ransacked funds Brown left to his "I Feel Good" Foundation, taking more than 13 million.
- b. Brown's income tax returns during the period understated Brown's income by approximately \$3 million per year, helping mask the massive taking by Cannon.
- c. Respondent Dallas served as co-trustee with Cannon, and as Brown's personal lawyer. He never uncovered Cannon's takings; never recovered any of the misappropriated funds; and never

corrected the approximately \$3 million annual understatement on Brown's income tax returns.

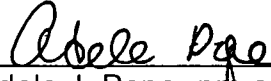
- d. From Brown's death on December 25, 2006 until he filed bankruptcy in 2010, Respondent Dallas worked to cover up Cannon's takings.
- e. During the period Respondent Dallas sought aid from the Attorneys General of Georgia and South Carolina, as well as from prominent law firms which had performed services for James Brown. They included Powell Goldstein (PG), Greenberg Traurig (GT) and Kilpatrick Stockton (KS).
- f. In July 2007, Robert Buchanan, Jr. and Appellant discovered \$900,000 Respondent Cannon had taken from Brown in 2006. By 2010 Cannon would be charged with taking more than \$12 million from Brown, and uttering a 2008 forgery to cover it up.
- g. On November 15, 2007 Mr. Dallas and deceased trustee Al Bradley properly valued Brown's assets on an Inventory & Appraisal (I&A) of Brown's properly base on a \$100 million offer made to them in October 2007.
- h. Despite his coverup of Cannon's misdeeds, Dallas has always vigorously supported Brown's 2000 estate plan, and the 1999 backup will, in which he is a named PR, and which makes Brown's estate plan ironclad.
- i. Beginning in late 2007 Messrs. Dallas and Cannon waged a bitter campaign against Judge Doyet A. Early, III, Mr. Buchanan and Appellant, claiming they were acting illegally and improperly. The claims were false.
- j. In July 2007 PG prepared documents for Respondents Cannon and Dallas in an attempt to move the "I Feel Good" Trust to Georgia to escape scrutiny of the South Carolina Courts.
- k. In July 2008 Respondent Dallas and PG, with Brown's grandson Forlando and Jacquelyn Hollander, sabotaged the court-ordered Christie's sale.
- l. The Estate's July 2008 motions to charge Mr. Dallas with the legal fees incurred in the Christie's sale interference, including his filings in this Court just days before the sale, are pending.

- m. Mr. Dallas has not yet paid the costs of the Aiken County Case 2007-CP-02-0122, brought in 2007 to removed the Cannon Group as PR/Trustees, or the appeal he conducted for two years.
- n. Mr. Dallas, despite the coverup of \$12+ million in takings, filed suit in March 2008 for a \$6 million PR/Trustee commission, and Cannon filed suit for a \$5 million commission. The Dallas suit is still pending.
- o. In 2010 Respondent Cannon was charged with taking more than \$12 million and uttering a 2008 forgery. He entered an *Alford Plea* to some of the takings in 2011.
- p. In 2010 Mr. Dallas filed for bankruptcy in Georgia, claiming his \$6 million commission claim as his largest assets.
- q. In 2010 Mr. Dallas and Mr. Cannon were named by the Attorney General, the Attorney General's Legacy Trust, and Ms. Hynie as witnesses against Mr. Buchanan and Ms. Pope. in case 4900.
- r. As is shown in Exhibits A and B, Case 4900 mediation, may bring an end to the joint harrassment of Appellant by the Attorney General, his Legacy Trust and Ms. Hynie.
- s. In Case 4900 the Attorney General, his Legacy Trust and Ms. Hynie sought tens of millions of dollars from Mr. Buchanan and Appellant, although at the same time both told the Supreme Court that Brown's assets were worth only \$4.7 million when he died.
- t. In 2012 Mr. Dallas was scheduled for a deposition in Case 4900, but the deposition of their own witness was stopped by Plaintiffs. He gave a sworn statement.

This Return and Opposition is supported by the Affidavit of Adele J. Pope filed in connection with the claim of Russell L. Bauknight for attorneys' fees; briefs of Appellant filed in Appellate Case Nos. 2013-001649 and 2014-000250; the attachments hereto; and the entire record of Case 4900, of which the Court

is asked to take mandatory judicial notice under Rule 201(d) SCRE.

Respectfully submitted,



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Adele J. Pope, *pro se*  
1228 Walnut Street  
Newberry, South Carolina 29108  
803-413-0573  
[Adele@popelawfirm.com](mailto:Adele@popelawfirm.com)  
S.C. Bar No. 4501

November 5, ~~2013~~ <sup>2014</sup>

From: "Early, Doyet A." <dearlyj@sccourts.org>  
To: "Adele Pope" <adele@popelawfirm.com>  
Cc: "BNewsome@nexsenpruet.com" , "rbuchananjr@atlanticbnn.net" , "asilvemail@mkb-law.com" , "kbw@swblaw.com" , "esmith@scag.gov" , "jmcintosh@scag.gov" , "jrdonsbach@donsbachking.com" , "FCrawford@RichardsonPlowden.com" , "sbias@RichardsonPlowden.com" <BNewsome@nexsenpruet.com;rbuchananjr@atlanticbnn.net;swblaw.com;kbw@swblaw.com;esmith@scag.gov;jmcintosh@scag.gov;rcook@scag.gov;agwilson@scag.gov;jrdonsbach@donsbachking.com;FCrawford@RichardsonPlowden.com>  
Subject: Re: Aiken County Case 2013-CP-02-1337/Richland County Case 4900  
Date: 11/3/2014 4:25:47 PM

Judge Manning and I will be ordering mediation in an attempt to resolve Mrs. Pope's claim for fees in the Aiken matter and a resolution of the Richland County case. We are asking for a concerted effort on everyone's part to agree on a mediator. Please advise by the end of next week if this is possible. If not we will select the mediator. I thank you for making this effort. Judge Manning and I are going to do all we can to make this a successful mediation and bring these cases to a conclusion. We urge everyone to enter this in good faith and with a willingness to participate with a desire to resolve these matters. Jack Early Sent from my iPad > On Nov 3, 2014, at 11:54 AM, "Adele Pope" <adele@popelawfirm.com> wrote: > > Dear Judge Early: > > Thank you very much. The following is, I believe, a summary of Case 2010-CP-40-4900 ("Case 4900"), counsel: > > The law firm of Kenneth Wingate, Esquire,(SWB) is the only attorney of record for the Attorney General and ALL Plaintiffs, but: > > a. Plaintiff Attorney General has terminated SWB. > > b. Emory Smith of the Attorney General's office represents the Attorney General in the FOIA Suit which has been consolidated > with Case 4900. > > c. Counsel for Plaintiff James Brown Legacy Trust ("Legacy Trust"), controlled by the Attorney > General, is unclear. SWB is still attorney of Record for the Legacy Trust. Mr. Bauknight is the trustee. > > d. Plaintiff Daryl Brown has terminated both SWB and Levenson, but no attorney has appeared for him in Case 4900. > > e. Plaintiff Terry Brown has terminated both SWB and David Bell/Matt Bodman, and hired Scott Keniley and John Donsbach, > but neither has appeared for him in Case 4900. > > f. Adult Plaintiffs Tommie Rae, Jason Lewis, Lindsey Brown, Janice Venisha Brown, Tonya Brown, Deanna, Yamma, Venisha and Larry Brown are represented by SWB, and I do not believe there has been any change in counsel status. > > g. The Estate of James Brown and the James Brown 2000 Irrevocable Trust are represented by SWB, but the Complaint says > the Charitable Interests are being protected by the Attorney General. > > h. Minors James B., Sydney L. and Carrington L. are represented by SWB and Mr. Bauknight as their agent. No GAL has been appointed. > > i. Adam Silvernail of Moses & Brackett is my attorney in Case 4900 and the consolidated FOIA Suit. > > I am taking the liberty of copying this to known counsel, and hope they will respond to you if I have made an error. > > Again, thank you for helping bring this to a conclusion. > > Adele Pope > November 3, 2014 > > > <--- Original Message---> > >From: Early, Doyet A. [dearlyj@sccourts.org] > >Sent: 11/3/2014 11:10:39 AM > >To: adele@popelawfirm.com > >Cc: BNewsome@nexsenpruet.com > >Subject: Re: Aiken County Case 2013-CP-02-1337 > > >Who represents the parties in the Richland case? I spoke with Judge Manning and he > >is on board. Please advise > > >Sent from my iPhone > > > > On Oct 29, 2014, at 10:36 AM, Adele Pope <adele@popelawfirm.com> wrote: > > > > Dear Judge Early: > > > > Responding to your direction made at the hearing yesterday, I nominate the > >following persons as a mediator. > > > > First Choice : Michael Polk > > > > Second Choice: Karl Folkens > > > > I did not know Michael Polk personally, but called him this morning and > >believe he has no conflicts. His rate is \$250 per hour, > > and he is in Columbia. That is a substantial consideration for me, as I must > >be mindful of all costs. > > > > Should we choose to have a voluntary "global" mediation of all issues between > >the Estate, 2000 Trust, the Attorney General, > > Russell, Bob Buchanan and me in the Forando Suit; the Wingate Suit; the > >consolidated FOIA suit ; and the pending appeals, > > I would suggest Mr. Folkens. His prior experience in the Wingate Suit > >mediation would be helpful. > > > > Please advise if I can provide any additional information. > > > > Adele Pope > > October 29, 2014 > >--- CONFIDENTIALITY NOTICE --- This message is intended only for the addressee and > >may contain information that is confidential. If you are not the intended > >recipient, do not read, copy, retain, or disseminate this message or any > >attachment. If you have received this message in error, please contact the sender > >immediately and delete all copies of the message and any attachments.

Exhibit A

**From:** "Adam T. Silvernail" <asilvernail@mkb-law.com>  
**To:** "Adele Pope" <adele@popelawfirm.com>  
**Subject:** Fwd: Aiken County Case 2013-CP-02-1337/Richland County Case 4900  
**Date:** 11/4/2014 6:17:13 AM

Sent from my iPhone

Begin forwarded message:

**From:** "Mark V. Gende" <MVG@swblaw.com>  
**Date:** November 3, 2014 at 4:16:03 PM EST  
**To:** "dearlyj@sccourts.org" <dearlyj@sccourts.org>  
**Cc:** "BNewsome@nexsenpruet.com" <BNewsome@nexsenpruet.com>, "rlbuchananjr@atlanticbbn.net" <rlbuchananjr@atlanticbbn.net>, "asilvernail@mkb-law.com" <asilvernail@mkb-law.com>, "Ken B. Wingate" <KBW@swblaw.com>, "esmith@scag.gov" <esmith@scag.gov>, "jmcintosh@scag.gov" <jmcintosh@scag.gov>, "rcook@scag.gov" <rcook@scag.gov>, "agwilson@scag.gov" <agwilson@scag.gov>, "jdonsbach@donsbachking.com" <jdonsbach@donsbachking.com>, "FCrawford@RichardsonPlowden.com" <FCrawford@RichardsonPlowden.com>, "sbias@RichardsonPlowden.com" <sbias@RichardsonPlowden.com>, "Joseph O. Thickens" <jot@swblaw.com>, "dblack@nexsenpruet.com" <dblack@nexsenpruet.com>  
**Subject:** RE: Aiken County Case 2013-CP-02-1337/Richland County Case 4900

Your Honor:

In response to Mrs. Pope's email below, Sweeny, Wingate & Barrow, PA has not been terminated by any Case 4900 plaintiff. However, SWB has filed a motion to be relieved as counsel for the Office of the Attorney General, and the AG has filed a motion to withdraw from the case. Neither of these motions have been heard or ruled upon and no substitutions of counsel motions have been filed. Therefore, technically speaking SWB is still counsel of record for all plaintiffs in Case 4900.

If there is a global mediation involving Case 4900, Mr. Folkens is the best choice for a mediator due to his knowledge gained through his prior attempt to mediate the case.

Please let me know if there is any other information you desire.

Mark V. Gende, Esq.  
Sweeny, Wingate, & Barrow, PA  
1515 Lady Street  
Columbia, South Carolina 29201  
803.256.2233 – Phone  
803.256.9177 – Facsimile

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**From:** Ken B. Wingate  
**Sent:** Monday, November 03, 2014 12:59 PM  
**To:** Mark V. Gende  
**Subject:** FW: Aiken County Case 2013-CP-02-1337/Richland County Case 4900

# Exhibit B

**From:** Adele Pope [mailto:[adele@popelawfirm.com](mailto:adele@popelawfirm.com)]

**Sent:** Monday, November 03, 2014 11:54 AM

**To:** [dearlyj@sccourts.org](mailto:dearlyj@sccourts.org)

**Cc:** [BNewsome@nexsenpruet.com](mailto:BNewsome@nexsenpruet.com); [rlbuchananjr@atlanticbbn.net](mailto:rlbuchananjr@atlanticbbn.net); [asilvernail@mkb-law.com](mailto:asilvernail@mkb-law.com); Ken B. Wingate; [esmith@scag.gov](mailto:esmith@scag.gov); [jmcintosh@scag.gov](mailto:jmcintosh@scag.gov); [rcook@scag.gov](mailto:rcook@scag.gov); [agwilson@scag.gov](mailto:agwilson@scag.gov); [jdonsbach@donsbachking.com](mailto:jdonsbach@donsbachking.com); [FCrawford@RichardsonPlowden.com](mailto:FCrawford@RichardsonPlowden.com); [sbias@RichardsonPlowden.com](mailto:sbias@RichardsonPlowden.com)

**Subject:** Re: Aiken County Case 2013-CP-02-1337/Richland County Case 4900

Dear Judge Early:

Thank you very much. The following is, I believe, a summary of Case 2010-CP-40-4900 ("Case 4900"), counsel:

The law firm of Kenneth Wingate, Esquire, (SWB) is the only attorney of record for the Attorney General and ALL Plaintiffs, but:

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- i. Adam Silvernail of Moses & Brackett is my attorney in Case 4900 and the consolidated FOIA

Suit.

I am taking the liberty of copying this to known counsel, and hope they will respond to you if I have made an error.

Again, thank you for helping bring this to a conclusion.

Adele Pope

November 3, 2014

<-----Original Message----->

>From: Early, Doyet A. [[dearlyj@sccourts.org](mailto:dearlyj@sccourts.org)]

>Sent: 11/3/2014 11:10:39 AM

>To: [adele@popelawfirm.com](mailto:adele@popelawfirm.com)

>Cc: [BNewsome@nexsenpruet.com](mailto:BNewsome@nexsenpruet.com)

>Subject: Re: Aiken County Case 2013-CP-02-1337

>

>Who represents the parties in the Richland case? I spoke with Judge Manning and he  
>is on board. Please advise

>

>Sent from my iPhone

>

>> On Oct 29, 2014, at 10:36 AM, Adele Pope <[adele@popelawfirm.com](mailto:adele@popelawfirm.com)> wrote:

>>

>> Dear Judge Early:

>>

>> Responding to your direction made at the hearing yesterday, I nominate the  
>following persons as a mediator.

>>

>> First Choice : Michael Polk

>> Second Choice: Karl Folkens

>>

>> I did not know Michael Polk personally, but called him this morning and  
>believe he has no conflicts. His rate is \$250 per hour,  
>> and he is in Columbia. That is a substantial consideration for me, as I must  
>be mindful of all costs.

>>

>> Should we choose to have a voluntary "global" mediation of all issues between  
>the Estate, 2000 Trust, the Attorney General,

>> Russell, Bob Buchanan and me in the Forlando Suit; the Wingate Suit; the  
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>> I would suggest Mr. Folkens. His prior experience in the Wingate Suit  
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STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

The Honorable Doyet A. Early, III Circuit Court Judge

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Appellate Case No. 2013 - 002582

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**SC Court of Appeals**

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v.

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

IN RE:

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

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**PROOF OF SERVICE**

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I certify that on the 5th day of November, 2014, I have served the RETURN AND OBJECTION TO MOTION OF ALBERT H. DALLAS FOR COSTS in the above matter on Respondents as shown below by hand delivery or by depositing a copy of same in the United States Mail, postage prepaid, addressed to their

attorneys of record as follows:

John. A. Donsbach, Esquire  
Post Office Box 212139  
Martinez, Georgia 30917-2139

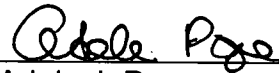
David G. Cannon  
P. O. Box 865  
Barnwell, SC 29812

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

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

Tanya A. Gee, Esquire  
William G. Newsome, Esquire  
PO Drawer 2426  
Columbia, South Carolina 29202-2426

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



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Adele J. Pope  
1228 Walnut Street  
Newberry, South Carolina 29108  
Telephone: 803-413-0753  
Email: [adele@popelawfirm.com](mailto:adele@popelawfirm.com)  
S.C. Bar No. 4501  
Petitioner, *pro se*

November 5, 2014

**Law Office of Adele J. Pope, P.C.  
1228 Walnut Street  
Newberry, South Carolina 29108  
803-413-0753**

November 5, 2014

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Post Office Box 11629  
Columbia, South Carolina 29211

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NOV 05 2014

**SC Court of Appeals**

Re: Wilson and Others v. Dallas and Others,  
Aiken County Case No. 2008-CP-02-1647 and others  
Appellate Case No. 2013-002582

Dear Ms. Kitchings:

In connection with the above matter, enclosed please find:

1. Original and seven copies, Return and Objection to Motion of Albert Dallas for Costs
2. Original and one copy of proof of service of the Return.

Kindly return a file-stamped copy to me in the stamped return envelope which is provided.

Thank you for your assistance.

Yours very truly,



Adele J. Pope  
S.C. Bar No. 4501

Enclosures

cc:

Counsel as shown on Proof of Service