

STATE OF SOUTH CAROLINA
In the Supreme Court

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APPEAL FROM AIKEN COUNTY
Court of Common Pleas

S.C. Supreme Court

The Honorable Doyet A. Early, III, Circuit Court Judge

Appellate Case No. 2013-001649

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.....Appellant,

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, Respondents.

**REPLY TO RETURN OF RESPONDENT ESTATE/2000 TRUST
(BAUKNIGHT) TO MOTION TO SUPPLEMENT THE RECORD
AND STAY SPOUSAL PROCEEDING**

Appellant submits this Reply to the Return of the Respondent Estate of James
Brown and James Brown 2000 Irrevocable Trust, speaking through Russell L.

Bauknight.

Appellant refutes all statements and conclusions of Mr. Bauknight not affirmed herein, and notes that many are incorrect. She craves reference to her motion and memorandum. She also addresses some of the inaccuracies below.

State Action to Transfer The "I Feel Good" Trust's Copyrights to Tommie Rae

On page 2 of his return Mr. Bauknight¹ describes the January 13, 2015 decision of the Honorable Doyet A. Early, III ("Jg. Early") granting Respondent Tommie Rae summary judgment on her spousal claim as "a recent summary judgment decision by the circuit court in an unrelated case." This is incorrect. It directly relates to this appeal.

For six years two Attorneys General (AGs) have worked continuously to transfer the 850 copyrights James Brown gave to his "I Feel Good" Foundation to Tommie Rae and others favored by the AG. Since May 8, 2013 they have been aided by two circuit judges.

The future of the 850 copyrights owned by what should now be the largest-ever private foundation for the education of needy students in this State are at stake. The future of private philanthropy in South Carolina is at stake. A brief review of how the "I Feel Good" Trust's Copyrights are being decimated to benefit Tommie Rae and others the AG favors is set out below.

Dec. 2007	Brown dies leaving no spouse and 10-12 children. Leaves 850 copyrights to the "I Feel Good" Foundation.
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¹ Mr. Bauknight currently serves as trustee for Respondent Tommie Rae Hynie ("Tommie Rae") in Richland County Case 2010-CP-40-4900 ("Case 4900"). He also serves as agent for Tommie Rae, AG Wilson and Tommie Rae's son in that case. He is seeking to require two 2011 FOIA suits to submit to mediation in Case 4900.

2007	Peoples DNA Protocol established to protect Estate and copyrights. 1. Jeanette, 2. La Rhonda and 3. Nicole identified and acknowledged as children. 4. Michael (incarcerated) seeks DNA testing.
Feb. 2007	Tommie Rae tells Jg. Early Brown's "book of music" (copyrights) alone may be worth \$100 million.
March 2007	Tommie Rae's discarded handwritten notes confirming she knows she is not Brown's spouse found at Beech Island.
August 10, 2007	Jg. Early, make handwritten notes, other documents, public.
January 2008	Wayne Byrd, Esq., finds Tommie Rae's notes in public space. Sends to 2 AGs, Jg. Early and others.
Feb - Mar. 2008	Jg. Early issues gag orders related to what Tommie Rae's counsel now calls "diary."
By Sept. 2008	Both Tommie Rae and AG in violation of Hynie "diary" Gag Orders. Tommie Rae talks to media about contents.
Aug. 10, 2008	AG contracts to treat Tommie Rae as spouse, defeat other heirs. No mention of Federal Copyright Act Termination Rights. Four DNA-proven children, and 2 from marriages left out of AG's settlement. Enough to prevent exercise of Termination Rights by settling parties.
2009	AG claims transfer of Termination Rights by settling parties to Legacy Trust is justification for AG's settlement.
May 26, 2009	Jg. Early approves settlement.
May 2010	AG McMaster, Tommie Rae, others, sue Bob and Adele in Case 4900. They answer & counterclaim not wife.
March 2011	Ct. of Appeals dismisses Bob's and Adele's challenge to AG Wilson and Tommie Rae sharing private lawyer, Case 4900 (without prejudice).
May 2011	AG, Tommie Rae ask Supreme Court to supplement

record to show music empire valued at \$4.7 million.

Fall 2011 Tommie Rae moves to intervene in FOIA suit. Tommie Rae and AG have FOIA suit transferred to Richland.

Nov. 2011 Bauknight tells Supreme Court Tommie Rae's elective share claim is "slam dunk." Says Estate/2000 Trust have no assets to speak of. Says Tommie Rae and son control the Federal Copyright Act Termination Rights, which is "all this case is about."

Court not advised that Copyrights could be protected from exercise of Termination Rights for decades with modest agreement with half of heirs AG omitted from his settlement.

2012 Jg. Early declines to void gag orders, citing *Wilson*.

2012 AG Wilson violates Reporters' Shield Law after "longtime friend" advises journalist of contents of "diary."

August 2012 AG Wilson & Tommie Rae halt deposition of their witness Albert Dallas when it become clear he will testify Brown & Tommie Rae were not married, and discussed it with him.

2012 Journalist sues under FOIA for "diary."

May 8, 2013 *Wilson v. Dallas* decision.

May 2013 AG's counsel asks the Hon. Casey Manning (Jg. Manning) to stay FOIA cases and Case 4900 where Tommie Rae has evaded deposition since 2011.

May 29, 2013 Levenson & Tommie Rae ask Jg. Early to reinstate AG's settlement. AG announces withdrawal from Aiken cases.

2013 -2015 AG, Tommie Rae remain Co-Plaintiffs in Case 4900. Bauknight is trustee for Tommie Rae and agent for son.

June13, 2013 Jg. Early ejects Appellant from Aiken cases. Refuses hearing to declare Gag Orders void or expired.

August 20, 2013 Bauknight makes clear his intention to reinstate AG's settlement which damages copyrights.

2013- 2015	AG refuses to protect copyrights, continues to be aligned with Tommie Rae.
September 2013	Seven children, through copyright counsel, confirm Tommie Rae was not Brown's spouse.
October 2013	Jg. Early appoints Bauknight based on petition not served on anyone which intentionally omits most heirs.
October 10, 2013	Sojourner SA appointed in <i>ex parte</i> order at Bauknight's request. Begins destruction of Copyrights. Allows Bell to siphon off termination rights agreements.
Oct. 2013 - Jan. 2014	Sojourner seeks to defeat heirs status of 4 children. His counsel paid \$125,000 per month by Bauknight.
	Jg. Early refuses hearing to appoint GAL for incarcerated son in California; orders withdrawal of heir status of dead daughter.
January 2014	Jg. Early dismisses Appellant's attempts to remove Bauknight for service to Tommie Rae, failure to account, etc.
By early 2014	Jg. Early segregates Tommie Rae spousal proceeding and bars most children and supporters of "I Feel Good" Trust.
July 2014	Journalist's FOIA suit for Hynie "diary" proceeding.
Sept. 2014	Sojourner sabotages "I Feel Good" Copyrights with "Stipulation of Facts" in Tommie Rae Summary Judgment which excludes obvious material facts showing not spouse.
2014	Emails Reveal Tommie Rae's advisors, Sonny worked on Bauknight's devaluation of music empire from correct \$84 million to \$4.7 million .
Jan.13, 2015	Jg. Early declares Tommie Rae spouse, declining to consider "diary." AG says he will not seek reconsideration.
Jan. 20, 2015	Jg. Early directs second mediation in Case 4900 where AG and Tommie Rae remain co-plaintiffs.
Feb. 2015	Clerk returns, at direction of Jg. Early, Appellant's motion

to Alter, Amend or Vacate Tommie Rae Order.

January 2015 Journalist makes public for the second time the handwritten notes showing Tommie Rae's knowledge she is not spouse. The AG, others know the contents,

The avenues available to the "I Feel Good" Foundation to protect its 850 copyrights from exercise of Termination Rights under the Federal Copyright Act are complex. But there is nothing complex about the basic steps every charity in America owning copyrights should take. The following considerations are essential:

1. Do not create a "widow" or "widower" where there is not one.
2. Properly identify all children.
3. Only HALF of the children, presumably the least expensive, are needed to prevent exercise of Termination Rights as to a particular song.

For more than six years the copyright policy of the State/AG with respect to the "I Feel Good" Foundation has been driven by Tommie Rae. Her interest is clearly adverse to the "I Feel Good" Foundation. Millions of charitable dollars and tens of thousands of taxpayer dollars have been spent to discredit anyone who dares to question the AG's decision to favor Tommie Rae with a quarter of the "I Feel Good" Foundation when she was clearly not Brown's spouse and protection from Termination Rights elections can be secured for decades for a fraction of that.

By granting the relief requested, this Court will be in a position to bring this destruction of the "I Feel Good" Trust's Copyrights and discrediting of anyone who wants to help save them to an end.

James Brown's Children (and Grandchildren) Excluded From the Tommie Rae Case Have Been Denied Their Federal Copyright Act Termination Rights; Their Due Process Rights; and Their First Amendment Rights

On page 3 of the return Mr. Bauknight asserts as a reason for this Court not to stay the Tommie Rae spousal proceeding:

“James Brown's children opposed Ms. Tommie Rae's motion and have filed a Rule 59, SCRPC, motion” [Emphasis supplied]

This is not correct. More than half of Brown's children – and all of his grandchildren – were shut out of the Tommie Rae proceeding before the hearing. This continues the AG's and Mr. Bauknight's 6-year pattern of making “heirs” of those the AG elects to favor, and (with knowledge that it is not correct) failing to advise the Court of the heirs the AG elects not to favor.

Under Sections 203 and 304 of the Federal Copyright Act, 17 U.S.C. Section 101 et seq., the “widow” or “widower”, as determined by the law of the deceased songwriter's domicile, is given special status under the Termination Rights provisions. An improper or collusive State law determination cause damage both to the beneficiaries of the deceased songwriter (the “I Feel Good” Foundation) and to all of the songwriter's children, as defined in the Act.

The Federal Copyright Act Termination Rights of each of the children intentionally excluded by Judge Early from the Tommie Rae proceeding , including Michael (incarcerated in California), Lisa (first marriage), Nicole, La Rhonda and other heirs under the Federal Copyright Act being properly determined on August 10, 2008 when the AG stopped the proceeding, are materially damaged by a collusive spousal determination.

These intentionally excluded children who do not have the favor of the AG, and did not have the favor of James Brown, provide the best source for the “I Feel Good” Foundation to protect its 850 copyrights from the exercise of Termination Rights as they vest over the coming decades. Judge Early refused to have a GAL hearing for Brown’s incarcerated son and the “Doe” Defendants. Now he has directed the Clerk to reject a Motion to Reconsider this Spousal Order because they were not parties. [Exhibit A]

While the attorneys wanting \$20 million from the AG’s 2008 settlement with Tommie Rae circle their wagons for a second dismembering, these real heir – along with Appellant as a creditor being sued by the AG and Tommie Rae – are denied their Due Process and (for heirs) Equal Protection rights².

Judge Early’s refusal for two years since *Wilson* to conduct a hearing on Appellant’s motion to declare void or expired the 2008 Hynie “diary” Gag Orders has deprived Appellant and others of both Due Process and First Amendment rights. The second release in recent days of Tommie Rae’s own handwritten notes makes clear what has been known since August 10, 2008: AG McMaster had no basis to stipulate that Tommie Rae was Brown’s wife. The Levenson clients knew Tommie Rae was not the spouse, but went along to get themselves about \$20 million – \$9 million of it for Mr. Levenson. David Bell, Esq. (“Bell”) went along with the AG’s settlement, and later

² Because Tommie Rae is young, the incorrect State law determination that she is the “widow” may even damage the Federal Copyright Termination Rights of Brown’s grandchildren, who were also excluded from the proceeding. For example, the refusal of Judge Early and Mr. Sojourner to require Tommie Rae to serve known heirs Nicole and La Rhonda (who died in December 2014) has materially prejudiced La Rhonda’s children, who now stand in her stead under the Copyright Act Termination Rights provisions.

intentional devaluation of the assets, to secure the music empire for Forlando – and vindicate his joint venturer David Cannon.

The AG's refusal to look into this, while remaining a co-plaintiff with Tommie Rae in Case 4900, has cast a dark shadow on our State and on the noble wishes of James Brown.³ [See Exhibit A]

The Tommie Rae Order Promotes the Seven-Year Fraud of Forlando/Bell

Mr. Bauknight says on page three that Appellant's involvement is not needed warranted, or legitimate. This is incorrect. She is needed to protect herself. She is warranted and legitimate both for her own needs and because the AG, Mr. Bauknight, Mr. Sojourner and Judge Early have declined to protect the "I Feel Good" Foundation.

Most egregious is the continuing fraud of David Bell, Esq, perpetrated on state and federal Courts since January 2, 2008. Most recently Mr. Bell told the court he was the attorney for Brown's incarcerated son Michael. He told the court Michael did not need a GAL. Then he did not protect Michael in the Tommie Rae case. He has also siphoned off Termination Rights with other heirs.

Mr. Bell began his dirty tricks in 2008 with six false grievances filed against Mr. Levenson. When he and Mr. Levenson joined the AG, the tricks were turned on Mr.

³ The importance to a charity of not creating a spouse where there is no spouse, and the obligation of the charity to "split heirs" to protect its copyrights by Termination Rights agreements with only the least expensive half (or half + 1) of the heirs was explored by Appellant Pope and Wm. Jeffrey Smith in their 2011 draft professional article *Private Foundations, Copyright Heirs and Musical Millionaires: why the James Brown "I Feel Good" Trust doesn't...* The article was circulated to professionals, and is in the record of the Aiken cases. It was not published pending the outcome of the appeal in *Wilson v. Dallas*, 403 S.C. 411, 743 S.E.2d 746 (2013). The decision in *Wilson* appeared to change the result and save the "I Feel Good" Foundation..

on Mr. Buchanan, Appellant and the “I Feel Good” Trust.

In 2010, when Mr. Bell, Mr. Levenson, counsel for Tommie Rae and Mr. Bauknight signed the 40% contingency fee contract to bring Case 4900 in the name of the Attorney General – with the AG and a plaintiffs clients not signing – it became a larger problem.

When Mr. Bell, Mr. Bauknight, Tommie Rae and the AG fought FOIA compliance and discovery to keep the Wingate public Wingate contract hidden for three years, it was unconscionable. When it was released by a federal judge in November 2013 somebody should have agreed Case 4900 was unconstitutional, or worse. But that has not happened.

This Court can bring these actions to a halt by staying the Tommie Rae proceedings until Mr. Bell’s actions are examined in light of the *Wilson* decision.

***Wilson v. Dallas* Deprived Robert Buchanan and Appellant of their Fiduciary Roles Only**

On pages 1 , 2 and 3 of the Return, Mr. Bauknight asserts that Pope’s post-remand conduct since this Court’s May 8, 2013 decision in *Wilson v. Dallas*, 403 S.C. 411, 743 S.E.2d 746 (2013) disregards the Court’s holding. He asserts that *Wilson* foreclosed Appellant’s right to remain involved in the Estate and Trust proceedings. He asserts that responding to Appellant has made “post-remand estate litigation exponentially more expensive and time consuming...”

This is not correct. The expense appears to have been incurred in evading and interfering with FOIA compliance; concealing public evidence that Respondent Tommie Rae was not Brown’s spouse; concealing the \$4.7 million appraisal; and trying to defeat

the heir status of the half of Brown's heirs with whom modest Termination Rights agreements should already be in place to protect the copyrights.

Appellant respectfully submits that *Wilson* did not deprive Mr. Buchanan or Appellant of their Due Process rights; did not deprive them of their First Amendment rights; did not deprive them of their FOIA rights; did not deprive them of their right to defend themselves in the 2008 lawsuit brought by Respondent Forlando Brown; and did not deprive them of the right to pursue their answers and counterclaims in Richland County Case 4900 where they are being sued for millions of dollars by Mr. Bauknight, AG Wilson and Respondent Tommie Rae.

Appellant Has Not Disregarded the Rules

On page 1 Mr. Bauknight asserts that Appellant "routinely disregards the rules in her litigation activities." This is simply incorrect. As shown above, it is the circuit court, the AG and Mr. Bauknight who are disregarding the rules. It is others who are not playing by the rules. See, for example, Exhibit A.

Supplementing the Record With the Tommie Rae Spousal Order is Appropriate

Tommie Rae, the AG and the Estate/2000 Trust sued Mr. Buchanan and Appellant for millions of dollars for conducting the appeal that became the *Wilson* decision. Seven days before filing an order directing a second mediation in that case, Judge Early declared Respondent Tommie Rae Hynie to be Brown's spouse. That decision appears to have been issued for the purpose of prejudicing Appellant in Case 4900.

The Attorney General has stated he will not seek reconsideration of this decision,

which favors his Case 4900 co-plaintiff. Mr. Sojourner is not protecting the “I Feel Good” Trust’s copyrights.

While the Federal Copyright Act Termination Rights provisions are not “all this case is about,” as Mr. Bauknight represented to this Court on November 1, 2011, they are important.

Rule 205 SCACR is applicable. This Court has the authority to supplement the record and stay the spousal proceeding to prevent further damage to Appellant and the “I Feel Good” Trust’s copyrights during this appeal.

Appellant Has an Actual Legal Interest at Stake

On page 2 Mr. Bauknight suggests Appellant has no actual legal interest at stake. This is incorrect. Mr. Bauknight has told Judge Early that Appellant cannot be paid even for her liquidated, allowed special administrator fee from 2007, until Case 4900 is concluded. Under the circumstances, a finding that Tommie Rae was Brown’s spouse in a case from which Appellant has been ejected without notice, hearing, or cause, is manifestly unjust and affects Appellant’s legal interests.

Appellant has Never Sought \$5 in Fees and Commissions

Mr. Bauknight asserts on page 3 that Appellant seeks “commissions and fees totaling almost \$5 million.” He know this to be incorrect.

Appellant’s Statement of the Case Was Proper and Accepted by Six Respondents

In his lengthy footnote 2 on page 2, Mr. Bauknight asserts numerous deficiencies in Appellant’s statement of the case. Appellant’s statement is not misleading, as Mr. Bauknight asserts. It is proper. The briefs are now in final form. Six Appellants have

elected not to file briefs or object to the statement, and are bound by Appellant's statement of the case.

Appellate Scrutiny is Not Certain

On page 3 Mr. Bauknight asserts that summary judgment in favor of Tommie Rae will most certainly be subject to appellate scrutiny. Mr. Sojourner's failure to protect the copyrights at the trial level, coupled with the AG's announced intention not to seek reconsideration and Mr. Bauknight's continuing fiduciary service to Tommie Rae, suggest that there such scrutiny is unlikely.

Conclusion

Appellant asks this Court to deny any request for sanctions and grant Appellant's motion to supplement the record and stay the spousal proceedings.

Respectfully submitted,



Adele J. Pope
1228 Walnut Street
Newberry, South Carolina 29108
Telephone: 803-413-0753
Email: adele@popelawfirm.com
S.C. Bar No. 4501

February 6, 2015

EXHIBIT A

Adele J. Pope
1228 Walnut Street
Newberry, South Carolina 29108
(803) 413-0753

January 29, 2015

The Honorable Liz Godard
Clerk of Court for Aiken County
109 Park Avenue, SE
Aiken, South Carolina 29801

By First Class Mail

Re: The Estate of James Brown A/K/A James Joseph Brown
Case No. 2013-CP-02-02849, 2013-CP-02-02850 and 2013-CP-02-02851

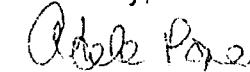
Dear Ms. Godard:

Enclosed for filing in the above matter please find an original and one copy of:

1. MOTION TO ALTER OR AMEND AND/OR RECONSIDER AND VACATE ORDERS (HYNIE SUMMARY JUDGMENT; MITCHELL INTERVENTION), with attachments; and
2. Proof of Service of the above; and
3. My check in the amount of \$25.00 to cover the cost of filing.

Kindly file the originals and return a file-stamped copy of each to me in the enclosed, stamped envelope. Thank you.

Sincerely,



Adele J. Pope

Enclosures

cc:

The Honorable Doyet A. Early, III
Counsel as shown on Proofs of Service

Mrs Pope Per Judge Early. I can not file these pleadings. You are not a party in the above case numbers listed

*Thank you
Shannon*

Georgia from the proceedings; the State Action to favor Tommie Rae; and the refusal of the AG to protect the "I Feel Good" Foundation and its 800+ Copyrights Under the Federal Copyright Act Termination Rights provisions, as demonstrated on Exhibit C hereto, will move before the Honorable Doyet A Early, III, ("Judge Early") pursuant to Rule 59 and 60 SCRPC at the Aiken County Courthouse for an order altering, amending and vacating the following Orders:

1. Order of the Honorable Doyet A. Early, III, dated and filed January 13, 2015, and received by Movant on January 22, 2015, finding Tommie Rae to be the spouse of James Brown (the "Tommie Rae Order"). A copy of the Tommie Rae Order is attached as Exhibit A.
2. Order of the Honorable Doyet A. Early, III, dated January 22, 2014, filed January 26, 2015, and received by Movant on January 28, 2015 granting Jeanette Mitchell's motion to intervene in the above-numbered cases, a copy of which is attached hereto as Exhibit B.

The grounds of this motion are that the Court overlooked or misapprehended that it lacked jurisdiction to determine the issues, and did so with knowledge that the issue of whether Tommie Rae is James Brown's spouse is before the Richland County Court in Case 4900; the Court intentionally attempted to damage Pope and others seeking to protect the Copyright Act rights of the "I Feel Good" Trust in the mediation scheduled for Case 4900; the Orders continue improper State Action commenced August 10, 2008 to favor Tommie Rae and attempt to make her appear to be the spouse of James Brown when she is not; the Orders continue the improper State Action to attempt to destroy the Federal Copyrights James Brown gave for needy students in favor of Tommie Rae, David Bell, Esq. (Bell), and Louis Levenson, Esq. (Levenson); that Orders and refusal of the Attorney General to protect The James Brown "I Feel Good" Private Charitable Foundation have promoted and advanced the State Action supporting for the

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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.

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Trust u/a/d August 1, 2000, Respondents.

PROOF OF SERVICE

I certify that on the 6th day of February, 2015, I have served the REPLY TO
RETURN OF RESPONDENT ESTATE/2000 TRUST (BAUKNIGHT) TO MOTION
TO SUPPLEMENT THE RECORD AND STAY SPOUSAL PROCEEDING on the
parties described below by depositing a copy of same in the United States Mail,
postage prepaid, addressed to their attorneys of record as follows:

ATTORNEYS OF RECORD FOR RESPONDENTS OR RESPONDENTS

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

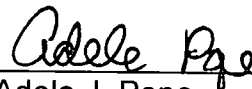
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February 6, 2015