

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEALS FROM DORCHESTER COUNTY
Court of Common Pleas

James E. Chellis, Master-In-Equity

Appellant Case No. 2015-001211

WELLS FARGO BANK, N.A., Respondent,

vs.

Latisa L. Cunningham, et al., Defendants,

Of Whom Latisa L. Cunningham is the Appellant.

INITIAL BRIEF

J. Martin Page, SC Bar No. 100200
BROCK & SCOTT, PLLC
3800 Fernandina Road Suite 110
Columbia, SC 29210

Latisa L. Cunningham
1227 Wild Goose Trl
Summerville, SC 29483

RECEIVED
SEP 22 2015
SC Court of Appeals

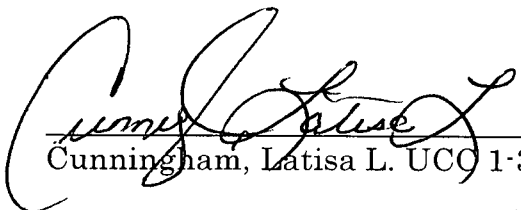
I, Cunningham, Latisa L., am one of the Title Holders and Beneficiaries of LATISA L CUNNINGHAM, the defendant. I am appealing this Case based upon the fact that the Lower Court seemed to have overlooked several issues that have been raised concerning this Foreclosure Case.

On or around about June 18, 2014, I filed a Motion to Dismiss due to the fact that I had just found out that I was in Foreclosure since about March 2014. My basis was surrounding the fact that my ex-husband was served and there was an affidavit filed in my case that stated that someone at my residence who was referred to as a live in boyfriend was served papers. I filed an Affidavit rebutting the Affidavit, because there was no one living at my residence that could have been served, and my ex-husband and I were already divorced. On September 30, 2014, a hearing was held for the Motion to Dismiss, in which the case was reset by Master-in-Equity, James E. Chellis.

As a result of resetting the case, the Judge ordered Brock and Scott to reissue the Summons and Complaint. The answer to the Summons and Complaint was answered on or around about October 11, 2014, which means that I would not have been in default as stated in the hearing on May 4, 2015. In my Answer to the Summons and Complaint, I challenged the validity of the suit based upon the failure to disclose that I was being sued in the Corporate Capacity. In the hearing on May 4, 2015, the Plaintiff, pretended that he was unaware of what Title 22 CFR 93.1-93.2 was all about. During the hearing I express to the Judge that I personally was not the Corporation and that the ALL CAP NAME did not apply to me because the Birth Certificate was the entity that was being sued. Throughout this entire hearing the Judge seemed to have being the Attorney for the Bank (Practicing Law from the Bench) the evidence of this can be seen by looking at the transcript that I have provided of the hearing from May 4, 2015.

As a follow up of me answering the Summons and complaint, the Plaintiffs filed a Motion to Strike my answer to Summons and Complaint, and I in turned filed an objection to the Motion to Strike. I stated that I was aware of the games in Court and the Judge expressed a dislike in the way that I stated but the facts stayed the same. I was still never giving full disclosure, of the functions and the Order of the Court, meaning that the Court was a privately owned entity; a Corporation that is governed by a corporate charter. The Corporate Charter of this Corporation does not give any authority for this Court to make a decision in reference to my estate (LATISA L CUNNINGHAM).

In Conclusion, this Case never had subject matter jurisdiction because Title 22 CFR 93.1-93.2 was an issue that this Court did not have jurisdiction to discuss along with about another 10 issues surrounding this case. Some of the other issues involved in this case are no filings of IRS FORMS W9, 4490, 1099A, 1099B, 1099C, 1099OID, IRS Form 8281 including but not limited to violations of Treaty Series 8281, the RICO Act, Tax Fugitive Act, Smith Act, Sherman Antitrust Act, Taft-Hartley Act, Deceptive Business Practice Act, Trading with the Enemy Act, Alien Registration Act, Breach of Trust, Internal Security Act, Trespassing, Stealing Federal Fund and taking 40% of Taxpayer fund and placing it into a Capital Account. With these many violations it should be clear that the Judgment and Order that was signed should be overturned and dismissed.


Cunningham, Latisa L. UCC 1-308

9/20/2015
Date

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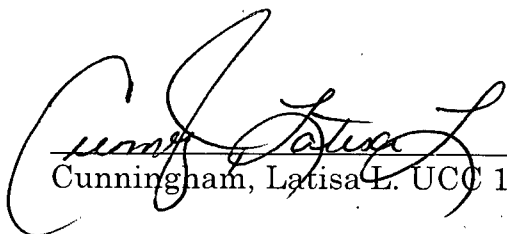
PROOF OF SERVICE

I, Latisa L. Cunningham certify that I am of such age and discretion to be competent to serve papers. That on the 21st day of September, 2015, I have served a copy of the documents listed below, by Certified Mail, sent to each of the following persons at the locations stated below, which is the last known location, and by depositing said envelope and contents in the U.S Mail.

Documents: -Initial Brief

Party(ies) Served:

J. Martin Page, SC Bar No. 100200
BROCK & SCOTT, PLLC
3800 Fernandina Road Suite 110, Columbia, SC 29210


Cunningham, Latisa L. UCC 1-308

9/20/2015
Date