

THE SOUTH CAROLINA COURT OF APPEALS

Armando Despaigne Zelveta, Appellant v. Charter Communications, LLC., Respondent,  
Appellate Case No.: 2016-000229

THE HONORABLE D. GARRISON HILL

GREENVILLE COUNTY

TRIAL COURT CASE NO. 2015CP2305171

RECEIVED

MAY 11 2016

SC Court of Appeals

ARMANDO DESPAIGNE ZULVETA PETITIONER'S PRO SE PETITION TO PROCEED IN  
FORMA PAUPERIS.

COMES NOW Petitioner, Pro Se, and moves this Court to grant Petition to Proceed in Forma Pauperis. In support thereof, Petitioner submits the attached Affidavit. As shown by affidavit, Petitioner does not have the funds to pay the filing fee to proceed this Civil Action and requests that the filing fees be waived.

WHEREFORE, Petitioner moves this Court to grant this petition.

Respectfully Submitted

On this day the 9th of May, 2016

*Armando Despaigne Zelveta* 05/09/2016  
Armando Despaigne Zelveta

THE SOUTH CAROLINA COURT OF APPEALS

Armando Despaigne Zuveta, Appellant v. Charter Communications, LLC., Respondent,  
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AFFIDAVIT

I, ARMANDO DESPAIGNE ZUVETA, being first duly sworn, state as follows:

- 1) That I am the Appellant-Plaintiff mentioned in Civil Case above.
- 2) That Appellant-Plaintiff Zuveta has a pending Health Care issue claim with the SOUTH CAROLINA WORKERS COMPENSATION COMMISSION.
- 3) That my working compensation's paycheck benefits are being paralyzed.
- 4) That I am not in dependency of any type of government programs.
- 5) That I have less than Nine Dollar (9) on my bank account.
- 6) That I do not own any property of value.
- 7) That I have conducted this civil case with out of my own pocket's expenses.
- 8) That Appellant-Plaintiff's REVIEW FOR PETITION EN BANC is not frivolous or taken solely for the purposes of delay.
- 9) That this civil action is of public interest and Appellant Zuveta inability to pay for would stop its proceeding had this Court not granted said Petition.
- 10) That Pursuant RULE 222 (a) COST ON APPEAL: costs shall be taxed against the appellant when the appeal is dismissed or judgement on appeal is affirmed.

I, ARMANDO DESPAIGNE ZUVETA certify that, under the penalty of perjury of the law of the \_\_\_\_\_, that the above written statements herein are true and accurate to

the best of my knowledge.

STATE OF SC

COUNTY OF York

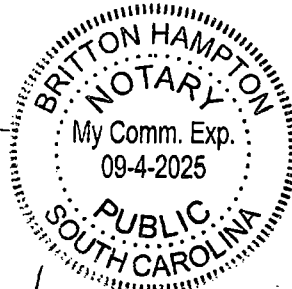
I, BRITTON HAMPTON, being duly sworn, or having duly affirmed to tell the truth, stated personally before me that they are competent under the law to give this affidavit and unless stated have personal knowledge of the facts stated herein:

Sworn or affirmed before me on 5/7/2014.

[Signature]

Notary Public

Commission Expires: 09-4-2025



Agree for 05/07/2014  
Amanda Desprezgne Zolner

THE SOUTH CAROLINA COURT OF APPEALS

Armando Despaigne Zulveta, Appellant v. Charter Communications, LLC., Respondent,  
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MAY 11 2016

SC Court of Appeals

AFFIDAVIT

I, ARMANDO DESPAIGNE ZULVETA; being duly sworn, state that I am the Plaintiff  
Appellant in this civil case and that every statement and Exhibits introduced is true  
and correct.

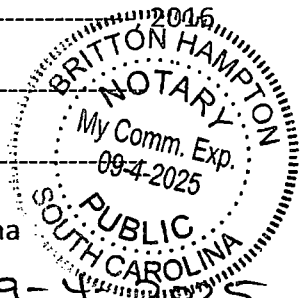
Sworn to before me this

7 day of May

[Signature]

Notary Public of south Carolina

My Commission expires: 09-4-2025



[Signature] 05/07/2016  
Armando Despaigne Zulveta

THE SOUTH CAROLINA COURT OF APPEALS

Armando Despaigne Zulveta, Appellant v. Charter Communications, LLC., Respondent,  
Appellate Case No.: 2016-000229

THE HONORABLE D. GARRISON HILL

GREENVILLE COUNTY

TRIAL COURT CASE NO. 2015CP2305171

SUPPLEMENTARY EVIDENCES

RECEIVED  
MAY 11 2016  
SC Court of Appeals

COMES NOW Appellant-Plaintiff, Pro se, making aware this court of Supplementary evidences related to this case. In addition, the correction of an error related to notarized documents in which Appellant requesting to Proceed in Forma Pauperis in this case.

On May 05, 2016, the Affidavit was notarized in North Carolina. Appellant Zulveta immediately correct the mistake and notarized it again on May 07, 2016, this time in South Carolina (See Affidavits of this action). This correction does not prejudice neither this action nor the Respondent.

STANDARD OF REVIEW

Below is a pattern of Appellant Zulveta's ordeal trying to present the case. See complaint below filed against Chairman T. Scott Beck. It was sent back to Plaintiff-Appellant to refile with SC Ethics Commission.

RE: COMPLAINT AGAINST SOUTH CAROLINA WORKERS COMPENSATION COMMISSION'S COMMISSIONER T. SCOTT BECK FOR DENIAL OF DUE PROCESS, BIAS AGAINST A CLAIMANT AT HIS COMMISSIONER' HEARING, VIOLATION OF THE CODE OF JUDICIAL CONDUCT AS CONTAINED IN RULE 501 OF THE SOUTH CAROLINA APPELLATE COURT RULES, VIOLATION OF CLAIMANT CIVIL RIGHTS, VIOLATION OF JUDGE'S OATH OF OFFICE.

Several times I mentioned to attorney Irvin H Philpot, III, once to attorney Wesley J

Shull, that the occurrence, next link on the chain fraudulent scheme all of the Defendants engaged it can not be possible fulfilled without the intervention and help from some government's high level official.

Attorney Shull requested a Workers Compensation's hearing which was scheduled for September 01, 2015. (SEE EXHIBIT "A")

Prior to the hearing on August 13, 2015 I sent the South Carolina Workers Compensation Commission a "Motion For an Appointed Translator" (SEE EXHIBIT "B") which it was returned because claimant (me) did not include \$25 fee required.

I offered to pay said fee and for that purpose I called the Commission at this Number (803) 737-5723 on:

08/21/2015 at 9:52 A.M. we spoke for 5 minutes and 14 seconds

08/24/2015 at 10:59 A.M., we spoke 2 minutes and 10 seconds

08/24/2015 at 2:17 P.M. we spoke 3 minutes and 17 seconds

Everytime I was told that according to their record my ex-employer's insurance carrier's attorney Wesley J Shull would bring a translator for the scheduled hearing. Each time I rejected this unilateral action. For obvious reasons I did not want a Translator who would be brought by the opposite side.

On 08/25/ 2015 at 9:29 A.M., this time having Phone Number (803) 737-5698 during 5 minutes and 12 seconds I spoke with Commissioner T. Scott Beck's assistant Shanee and tried to convince her that a Translator should be appointed by SC Worker Compensation Commission, not by my opposite side's attorney Shull. She said she would speak with Commissioner Beck about it and would call me back about his decision.

Assistant Shanee called me that day at 10:12 A.M. For a period of time of 11 minutes and 45 seconds I tried to convince her that as far as I know nothing in SC laws indicate that a Translator should be brought by the opposite party of a Non-efficient English speaking. In the end Assistant Shanee told me: "Take it to Commisssioner Beck at the hearing".

Later that date on 08/25/2015 at 4:43 P.M. from SC Workers Compensation's Human Resources Alicia called to reassure me that theTranslator will be brought by attorney Shull. If I have any objection I would have to speak with Commissioner Beck at the

hearing. Once again I rejected to that decision. Prior to this occasion, Alicia had helped me to conduct business with the South Carolina Workers Compensation Commission.

On September 01, 2015 hearing date I introduced said Motion For Appointed Translator and also another I re wrote dated Sept. 01, 2015 just in case for this current occasion (SEE EXHIBIT "C"). I explained Commissioner T. Scott Beck the situation. Stated that with ample time I requested a translator even, after being told that I have to pay a fee which I agreed to it.

Commissioner, and me, we discussed my rejection based on the law. In the end, he ruled and allowed my motion but I have to use the translator my opponent brought. I rejected the order that was enforced by the Commissioner against the law. The hearing was conducted using the translator attorney Wesley Jackson Shull brought.

In addition, prior to the hearing attorney Shull introduced a copy of the Civil Action I have against him in Greenville Division District Court. Since I have a Civil Action filed against attorney Shull along with his client my ex-employer Tim Case in response I introduced a Motion requesting attorney Shull be removed as my ex-employer's attorney based on conflict of interest (SEE EXHIBIT "D"). After lengthy discussion this Motion also was denied by Commissioner Beck..

Neither my employer's medical provider nor my attorney Philpot had provided me sufficient of my own medical record which was disproportionately low compared with the medical record of mines attorney Shull has. For that reason, trying to obtain more of my medical record I introduced a Motion to Postponement or Adjournment of the scheduled hearing (SEE EXHIBIT "E"). This motion also was denied. I give notice that attorney Shull to this Motion he issued a late response which I never had nor acknowledgement that it exists until after the hearing. I never had the chance to respond to it. (SEE EXHIBIT "F").

Here is the outrage. At the end of the hearing I asked reporter Skylet Kean for a copy of transcript which she informed me it would be approximately 40 pages at \$5 each.

Same date of hearing 09/01/2015 at 2:29 P.M. over the phone I called her and from that moment she was reluctant to provided me the transcript. Call duration 4 minutes 46 seconds.

On 09/14/2015 at 1:29 P.M. another call, same reluctance from her. Call duration 4

minutes 41 seconds.

And again on 09/14/2015 at 7:33 P.M. call duration 11 minutes 25 seconds. Reporter Kean was determined to not to provide me the transcript.

On 09/15/2015 Lori Fisher on my behalf asked reporter Kean for the transcript and still, we went through a lot having her to agree to hand over to me the transcript. This time she said transcript contains 30 pages, instead of 40. Cost \$150. (SEE EXHIBIT "G" EMAIL FORWARDED TO REPORTER'S EMAIL ADDRESS).

Upon agree, Plaintiff was to send a \$150 Money Order and she would forward transcript to the mail. After many times warned reporter I want complete transcript plaintiff decided that it would be better drive to Columbia, SC and see the transcript before pay for.

I arrived to Columbia only to find out that the transcript contains 20 pages. (SEE EXHIBIT "H").

The problem is that it was a very lengthy hearing in which Commissioner Beck acted as he was attorney Shull's attorney, denied me Due process.

On the report from page 8 line 10 my objection to use attorney Shull was of a lengthy conversation. My objection to this lack of Due Process is absented on the report.

On page 19 line 10 it was a long argument regarding my objection to attorney Shull be at the hearing. That argument is missed.

On page 19 line 10 after my insistence attorney Shull asked Commissioner Beck to rule on the Motion to Withdraw him as My Employer's attorney.

Page 19 line 12 Commissioner denied to have a motion which I had hand over to him several times and he refused to accept. Argument is missing again.

Page 19 line 14 Attorney Shull made decision for Commissioner Beck while ruled: MOTION WITHDRAWN THEN".

Page 19 line 15 after repeatedly being asked Commissioner denied again to receive a motion from me.

All of this time I handed over to him the Motion to Withdraw Attorney Shull and requested Commissioner Beck to either sign it, or to allow some kind of prove that the motion was introduced. In the transcript Attorney Shull made reference to the Motion

and urged Commissioner Beck more than once to make a decision upon.

Notice that attorney Shull on the order indicates that it was a lengthy hearing reaffirming that everything is not in the transcript.

As result, of Commissioner Beck's deprivation of Appellant" Constitutional Rights: a) attorney Shull produced and introduced atb the second Workrs Compensation's hearing a signe fraudulent medical's physician statement signed by the same doctor who abandoned his patient Appellant Zulveta long ago, b) Commissioner Beck had his personal motive forcefully appointing Appellant a translator from opposite side, c) the conflict of interest was there and it is there since attorney Shull is a defendant in: UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT No.: 15-2561, Armando Despaigne Zulveta Plaintiff-Appellant vs. State Automobile Mutual Insurance Co., Steadman Hawkins of the Carolinas, Tim Case, Wilson Jones Carter & Baxley, PA, Philpot Law Firm, P.A., TC Unlimited, Inc., Curtis Elliot, Robert P. Restrepo, Jr., Stephen R. Bruner, Irvin H. Philpot, III, and Wesley J. Shull, Defendants-Appellees, d) Current Chairman T. Scott Beck along with defendants above in the federal Civil Action for their own personal enrichment they have turned South Carolina Workers Compensation Commission's Section 42 and 67 into the Jim Crow's laws of the South Carolina's injured workers. Almost a year ago in the US Distric Court (Greenville) Appellant mentioned Jim There are more serious unlawful misconduct involvement, d) Appellant's Workers Compensation's rightful issuance of paycheck benefits fraudulently have been paralyzed for over a (1) year, d) Chairman Beck, and Commissioner Campbell, at least these public officils in conjuction with private corporations, Appellant's former employer with his insurance carrier, and Greenville Health System, etc., they have turned SC Workers Compensation's Title 42 and 67b into the South Carolina's injured workers' Jim Crow's laws.

(SEE EXHIBIT "A" contains: Email forwarded to Court reporter Skylet Kean, date 09/15/2015, also INVOICE date 09/16/2015, and Transcript pages 8, and 19.

Below is Greenville Library System Board of Directors' violation of Appellant's Constitutional Rights.

On October 22, 2016 Greenville Library System issued a Tresspass Notice against Plaintiff-Appellant who was escorted out of the library by Simpsonville Police Department and said library's security officer.

Trying to address this problem among other letters Appellant forwarded Certified Mail of Complaint to: Bob Taylors, Chairman of Greenville County Council (SEE EXHIBIT "B" Certified Letters dated October 22, 2015, COMPLAINT AGAINST GREENVILLE LIBRARY SYSTEM EXECUTIVE DIRECTOR BERVELEY JAMES and also SEE LETTER FORWARDED TO ATTORNEY HILL also dated October 22,2015. In addition, SEE COMPLAINT AGAINST PRESIDING HEARING'S ATTORNEY S. ALLAN HILLS datd November 12, 2015, along with Lina Bertinelli's and Berveley James' card.

After being expelled from the public library: a) Appellant contacted Library's officials because Trespass Warning Notice dated October 22, 2015 has not enough information of the alleged incidents (SEE EXHIBIT "B" OCTOBER 22, 2015 TRESSPASS WRNING NOTICE, b) On November 09, 2015 hearing's date upon requestion once again Appellant was provided with "more information" of what it is alleged, (See Library's letter of clarification dated November 30, 2015, c) continued hearing of appeal also is denied (See letter of library's denial dated December 16, 2015). Afterwards, all documentation sent by Appellant was ignored by Board of Directors as well as Bob Taylors. At the scheduled hearing date November 09, 2015, d) Appellant brought my own translator who at the hearing was widely critized, blasted, interrupted for no reason, etc. Finally my translator was discharged by Board of Director presiding attorney Allen who anyhow he is not supposed be there as well as Director Breveley James upon Appellant's requestion to step down from the table as result of conflict of interest. Board of Directors forced Appellant to request an Appointed Translator from them for next scheduled hearing dated 12/14/15, e) at the 12/14/15 hearing neither the acusers were present nor accusers' name which include library's employees and visitors weren't provided to Appellant upon several requestion, f) at said hearing Director Laura Baker twice interrupted Appellant (translator) and asked if: APPELLANT HAS CALLED CHAIR CAMPBELL: "JACKASS". At the time and afterwards for a very long time Appellant thought that Director Baker was harrassing Appellant, diverting his course of the action, etc., g) relying on prior experiences at the Greenville Circuit Court's hearing date January 25, 2016 Appellant was carefully watched and struggled with my out of pocket paid appointed by the court translator Emilio Alphonso getting her into delivering genuine translation of what I had said while Appellant suspected Judge Hill's body language sent signals to translator Alphonso making her to say things I did not say, twisted or not finished my sentences, etc. Otherwise, it was a terrible incompetent appointed Translator who the court has appointed to my Civil Case. Appellant can not stop reaching the conclusion that similar unlawful cheating was used by Commissioner Beck who fervently opposed and forced Appellant to use adverse party attorney Shull's

translator at his Worker Compensation's hearing. As result, a fraudulent and incompleated, unreliable, useless Transcript (other than to incriminate Commissioner Beck itself anyhow) was issued by Court Reporter Skylet Kean, h) therefore, Appellant predict, guarantee that no reliable transcript would be produced neither from Greenville Circuit Court's hearing date January 25, 2016 nor from Greenville Library System's hearing date 12/14/15 when the situation arrives for production of transcript. That is their smoking gun evidence of corruption.

Below is the usual unlawful activity in which Gallivan White & Boyd P.A. along with co-defendants mentioned in federal civil case above they have engaged for over a (1) year at federal's, state's, and SC Workers Compensation Commission's level. (SEE EXHIBIT "C".

#### CONCLUSION

The lower court as well as Charter's attorney Yarbrough they have acknowledgement that this civil action stills pending in the court of appeals. Therefore, this case is of public interest and also, exempt from ADR. Other than to prevent Plaintiff Zulveta to present his case Appellant sees no other reason for ADR but: a) placing the burden of this Civil Action on appellant and taxpayers and putting us under strain from Appellant's case that has merit and abundant unlawful activities in court by opposite party trying to destroy it, b) As usual Gallivan White and Boyd P.A. in conjuction with Shawn and Steve Lopez, Non-Jury Coordinator of Greenville County Clerk of Court trying to poise appellant's case while giving me ill legal advises and while fraudulently the Clerk of Court tampered with Appellant Civil Action's Roster, c) On April 14, 2016 Appellant forwarded an email to attorney Yarbrough making her aware of the pending appeal (SEE EXHIBIT "C" email listed in it as Exhibit "B"). Attorney Yarbrough response as always are with ill legal advises stating: I am (Appellant) confusing my legal cases and to make it worse Charter's attorney Yarbrough asked Appellant to review his pleadings (See EXHIBIT "C" YARBROUGH'S EMAIL MARKED AS EXHIBIT "D" DATED APRIL 22, 2016, d) Had Appellant be deceived by attorney Yarbrough with false promises while tried to lure me into mediation Appellant would be defrauded again, the mediator is the only one who would make money while Appellant also most likely, would end up owing

money to the Mediator, e) attorney Yarbrough as usual tried to defraud Appellant when she recommended to use mediator Marvel from lower court who legal fee does not match the fee attorney Yarbrough told me, (SEE EXHIBIT "C' YARBROUGH EMAIL DATED APRIL 13 AND CHARGING ME \$250-300. Had the mediation took place and based on experience of course most likely, that would be Mediator Marvel's legal fee: \$250-300. See Mr. Marvel's letter dated May 05, 2016. His legal fee is well below of what attorney Yarbrough said, f) on 04/27/2016 in lower court Appellant filed a request for appointing of two more mediator (SEE Roster). Even with all this commotion regarding this case Appellant request was not listed in lower court roster like some other motions even after I have paid for out of my pocket expenses and also for court appointed translator (SEE ENCLOSED EXHIBITS) I can not get the requested hearing. That is a routine procedure that had happened with Judge Ford and attorney Hills. Commissioner Beck and his Judicial Director Amy Brady, etc.

Sheppard v. Maxwell, 384 U.S. 333 (1966), the Supreme Court held: In cases where excess publicity would serve to undermine the defendant's right to due process, limitations can be put on public access to the proceedings. Appellant notice this court that this case, does not apply to the defendants because their legal procedures presented in court are unlawful. There is not legal rule that protect them. Therefore, my civil case must be make public. Enough is enough.

In addition, Appellant has good reason to believe that at least, Greenville Judicial Department is plagued by corruption and bribery. In each Appellant's Civil Case there is a pattern of relation base on family last name, also public officials who has worked under the same leading body of institutions suit by Appellant. Appellant's complaint against individual "A" is handle by a public official with the same last name or who prior had worked with individual "A". According to their field of work this should not be unusual it is not for: reliable indication and probable cause of racketeering, fraud, conspiracy, etc., involved.

a) Attorney Hills with his violation of SC Appellate Rules CANNON as well as Chase Campbell's support and involvement in Appellant's Due Process's violation at the Library's hearing,

b) Commissioners Campbell and Beck's deprivation of Appellant's Due Process while using same pattern of rather than neutrals, they choose to act as corporations', employer's, insurance carrier's attorney and in the process use their authority to judicial lead and ambush an injured worker, a SC Workers Compensation's claimant,

c) With this Court of Appeals Appellant denounced lower Court Judge Hill's decisions that are not consistent with the law. Subsequently, Administrative Judge Stillwel for no reason soever since none of both judges provided written reasons, they denied Appellant's request to Proceed In Forma Pauperis.

#### PROBABLE CAUSE

1) Attorney Hill at the Library Board of Directors most likely has either business or family connection with lower court Judges Hill. Long before all of this commotion in court started Appellant Zulveta accused library's employee Elena of: "everytime employee Elena gets next to me putting books at the shelves I notice she focus on my paperworks on top of the table" (spying). (SEE CERTIFIED LETTER SENT TO GREENVILLE COUNTY COUNCIL PAGE 2, DATE OCTOBER 22, 2015). It was a library move intend to block Appellant to file civil suit below. As result, Appellant was excluded from participate in the library's public activities. Therefore, Greenville Library System Library tried to block my access to court when prevented Appellant to use Public Library internet as well as court's legal research.

1) Judges Hill and Stillwell both served at the Board of Directors of Greenville Health System an institution suit by Appellant and which Gallivan White and Boyd, P.A. is also in federal court involved as the "MOVANTS" with a history and culture of defaults and unlawful procedures introduced in both courts.

2) Any complaint against those mentioned above would be taking care at the South Carolina Supreme Court Disciplinary Counsel by a Campbell or by the Ethics commission which with all due respect and without nanyone gets offended Appellant has lost confidence in South Carolina Judicial System.

3) The Hills in Greenville, SC, having the support of Clerk of Court Shawn and Steve Lopez Non-Jury Coordinator.

4) The Campbells in Columbia, SC, with the support of SC Workers Compensation's Judicial Director Amy Brady.

5) South Carolina Governor Nikkie Haley is been aware of this unlawful procedures introduced in her court and nothing is doing about it. For the contrary, this unconstitutional activities of Appellant be discriminated against based on race, color, ethnic, nationality, be excluded from legal proceedings while face what legally is being called: Racketeer. Appellant Zulveta makes very clear that he has no concern to any court dismissing his case based on what it is called improper talk, than rather focus on

Plaintiff's message and also, merits of his case.

6) Soon after the hearing with Appellant was effectuated Commissioner Beck was promoted to Chairman of the South Carolina Workers compensation.

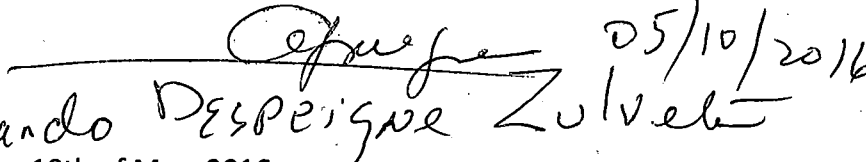
7) Soon after the hearing with Appellant was effectuated member Attorney Hill was promoted to Greenville Library System's Board of Director's Vice Chair.

8) Soon after the hearing with Appellant was effectuated member Chase Campbell was promoted to Greenville Library System's Chair.

9) Soon after the Commission hearing with Commissioners Campbell and Beck was effectuated Appellant went to serve legal documents to attorney Shull at his working building (tried to secure service, reduce legal costs). There was attorney Shull in casual clothes gathering around six (6) co-workers to make mockery of Appellant rather than taking care legal business. Appellant Zulveta ignored their bullying until, it turned into aggressive talk. Appellant just got out of the building and spent my out of pocket money certifying and sent them my legal papers. Why Appellant has to perswonally served, or certified mail, or go court to personally get filed his legal documents tryingt to secure its proper introduction in court? Why?

10) Rather than being demoted for deprivation of Due Process, discrimination, unlawful procedures in court, etc., these individuals are promoted to a governmental body that should serve the people.

11) Therefore, based in substantial evidences and probable cause most likely than not, High Ranking Public Officials are involved in this racketeering scheme defrauding taxpayers, state and federal govenment, injured workers of their values and properties. In the process, a) put individuals into dependency of state's and govenment's benefit program without them realize it, b) send individulas to an already strained unemployment's line, defraud everybody for their own personal interest and others' benefits.

 05/10/2016  
Armando Desperigue Zulveta

On this day the 10th of May, 2016

Respectflly Submitted;

# EXHIBIT "A"

**Subject:** OBTAIN TRANSCRIPT FROM HEARING SEPTMBER 01, 2015 PRESIDED BY HONORABLE T. SCOTT BECK

**From:** Armando Despaigne zulveta (zularmando@yahoo.com)

**To:** fftpam@aol.com;

**Date:** Tuesday, September 15, 2015 7:19 AM

ARMANDO DESPAIGNE ZULVETA SEPTEMBER 15, 2015

P.O.BOX 24892

WINSTON-SALEM, NC 27114

PHONE NO.: (864) 305-9480

MS. SKYLET KEAN, COURT REPORTER

113 ISLES WAY

COLUMBIA, SC 29229

RE: OBTAIN TRNSCRIPT OF SC WORKERS COMPENSATION COMMISSION'S HEARING EFFECTUATED ON SEPTEMBER 01, 2015 AT GREENVILLE COUNTY SQUARE AND PRESIDED BY HONORABLE T. SCOTT BECK.

DEAR MS KEAN:

PLEASE FIND ENCLOSED USPS MONEY ORDER VALUE OF ONE HUNDRED AND FIFTY DOLLARS (\$150.00) ADDRESSED IN YOUR NAME FOR THE PURPOSE OF OBTAINING 30 PAGES OF SAID MENTIONED ABOVE TRANSCRIPT.

MS. KEAN, PLEASE TAKE THIS LETTER AS AN EFFORT OF GOOD FAITH CONFERRING YOU OVER THIS MATTER.

IT IS DIFFICULT FOR ME TO STOP REACHING TO THE CONCLUSION THAT FOR SOME REASON YOU ARE INTERFERING WITH THE WORKERS COMPENSATION ISSUE ATTORNEY WESLEY J. SHULL, AND I THE CLAIMANT, WE HAVE AS OPPOSITE PARTY. AT THE SAME TIME I MENTION THAT I REACHED THIS CONCLUSION BASED ON YOUR PERSISTENT MISCONDUCT WHICH ADVERSELY AFFECTS ME. ON NUMEROUS OCCASSIONS YOU TRIED TO DISSUADE, PERSUADE ME FROM TRYING TO GET THIS TRANSCRIPT THAT RIGHTFULLY CLAIMANT IS ENTITLED FOR. LAST NIGHT BY PHONE SOMEONE ON MY BEHALF SPOKE WITH YOU. YOUR POSITION WERE SIMILAR: RELUCTANT. THROUGH MY TRANSLATOR YOU TRIED TO CONVINC ME AGAIN THAT THERE IS NO NEED TO I POSSESS THIS TRANSCRIPT. I ASSUME THAT YOU ARE MAKING A LIVING AS REPORTER AND LIKE WE ALL AT THE HEARING AGREED YOU HAVE TO BE PAID FOR. STILL, HERE I WAS UNSUCCESSFULLY FOR A WHILE TRYING TO FORCE YOU INTO TAKE THE COST OF THIS TRANSCRIPT THAT AS CLAIMANT LEGALLY BELONGS TO ME. STILL, YOU WERE RELUCTANT TO HAND OVER SAID TRANSCRIPT, REFUSED THE MONEY HAVING AS BASE AN EXPLANATION THAT NOONE QUITE WOULD UNDERSTAND. MY TRANSLATOR DOESN'T, NEITHER CLAIMANT. AS LONG AS YOU GET PAID YOUR JOB IS TO MAKE THIS TRANSCRIPT REACHABLE TO CLAIMANT. TAKE CARE OF YOUR JOB.

I WOULD LIKE TO REMIND THAT AS REPORTER YOU ARE BOUND BY NUMEROUS SC LAWS. AMONG THEM, PROFESSIONAL CONDIUCT.

I JUST WANT THE TRANSCRIPT, A COMPLETE TRANSCRIPT WITH NO OMITTION AND SIGNED BY YOU, THE REPORTER. MEANWHILE, PLEASE PRESERVE ON YOUR

INVOICE

September 16, 2015

To: Armondo Zulveta  
Post Office Box 24892  
Winston-Salem, South Carolina 27114

WCC# 1416780  
Invoice No. 20210  
Date of pre-hearing conference: September 1, 2015

Re: Armondo Zulveta v. TC Unlimited, Inc.

Location: Greenville, South Carolina

Reporter: Skylet Kean

Description

Original and copy of pre-hearing conference transcript, taken in the above-referenced cause.

The original will be emailed to the Commission.

20 Pages @ \$5.00 per page \$100.00

Total \$100.00

Make check payable to:

Thank you!

Skylet Kean  
113 Isles Way  
Columbia, South Carolina 29229

1 his conduct as a professional officer of the court.  
2 He has nothing to say here. Whatever I say here, he  
3 has no business to hear. And I am asking you for the  
4 discretion to removing him especially taking into  
5 account that he made relevant the case in federal  
6 court here.

7 MR. SHULL: Can I have a copy of that  
8 document? Will you ask him if I can have copies of  
9 whatever he has handed?

10 THE COURT: This is the motion to appoint  
11 an interpreter.

12 THE TRANSLATOR: I am going to tell the  
13 Commissioner what they do.

14 THE COURT: Mr. Zulveta, just hold up for  
15 a second while I get some notes made here.  
16 Mr. Zellman?

17 MR. ZELLMAN: Yes, sir.

18 THE COURT: Are you a friend, associate or  
19 relative of a party or counsel for a party involved  
20 in this proceeding?

21 MR. ZELLMAN: No, sir.

22 THE COURT: Have you served in any  
23 investigative capacity for any party involved in this  
24 case?

25 MR. ZELLMAN: No, sir.

1 got counsel. We're done.

2 THE TRANSLATOR: But I would like to speak  
3 about monetary issues.

4 THE COURT: Not now. This matter is  
5 concluded. You said you wanted counsel. We're done.  
6 You can get your counsel, retain your counsel. Let  
7 him deal with that issue for you.

8 THE TRANSLATOR: And owe \$25,000 more?  
9 2500 more.

10 MR. SHULL: Do you want to rule on the  
11 motion to have me dismissed as counsel?

12 THE COURT: I don't have a motion to  
13 dismiss you.

14 MR. SHULL: Motion withdrawn then.

15 THE COURT: I don't have a motion.

16 THE TRANSLATOR: Do I have to pay \$25 more  
17 to fight the motion?

18 MR. SHULL: Okay.

19 THE COURT: Pardon?

20 THE TRANSLATOR: I am in debt with a  
21 lawyer who is in cahoots with him. And I don't  
22 appreciate it. I don't appreciate it.

23 THE COURT: You can take that up with the  
24 Office of Disciplinary Counsel. But I have no  
25 jurisdiction over lawyer/client.

100

# EXHIBIT "B"

Armando D Zulveta

October 22, 2015

P.O Box 24892

Winston-Salem, NC 27114

Email: acere1296@gmail.com

Mr. S. Allan Hill, attorney

205 E. Broad St.

Greenville, SC 29601

RE: GREENVILLE COUNTY LIBRARY SYSTEM'S EMPLOYEES' ABUSE OF AUTHORITY,  
VIOLATION OF CIVIL RIGHTS, ETC.

Dear attorney Hill:

Please find enclosed letter of complaint I forwarded to Chairman Taylors which I suggest you to read first to have better understanding. It explains almost everything.

I went to the website looking for officials who govern Greenville County Library System and I found out that you are a member of its Board of Trustee. Congratulations Mr. Hill, I still believe that you are a good man.

Mr. Hill, perhaps you would find these letter to be some kind of strong? but the matter is that this is the fact and if by any coincident some of the people I mention they are a close friend of yours I regret that that happen. But what is written on these letters is nothing but the true. It can be seeing that the opposite side has neither transparency, nor good faith.

Mr. Hill, if anyone in this world has given me reason to be aggressive and intimidating it would be North Hills Automotive when they took my car. Instead, as you know, the couple of times I needed to go there asking for my car each time I requested a law enforcement police officer to escort me trying to prevent the same more thing Greenville County Library is accusing me now: Of I being aggressive, intimidating, even assault people when the occasion arose and someone can get away with it. This is the easier way of cover wrongdoings up and in the process have the threat disposed by

getting the victim arrested. On this occasion, it happened at Greenville County Library's property which Director James think it is her personal property.

As a member of the Board of Trustee I ask of you please to intercede on this issue because I am determined to get my privileges of visiting the library restored. One way or another by every channel of procedures I will get my privilege restored.

From the top to the bottom what those employees have done it is outrageous. They can say whatever untrue statements they want but the fact is that by evidences, they don't look too good.

On the 21st of this month I went to Simpsonville branch to address Elena's untrue statement that it can be verified by surveillance cameras. I addressed the situation to her manager, not to Elena that was there that day. This is having good faith trying to solve the problem. A person who rely on a grieves of system while addressing the problem normally he/she is far from being aggressive. And you know Mr. Hill that I know very well that I am going to be a lot of more better off addressing the problem by peaceful means rather than to be aggressive. And I intimidated who?

My assumption is that Manager Bertinelli after was warned by me that a complaint will be written against her, and Director James, they came up with the unlawful idea of accusing me of being aggressive to manager Bertinelli in order to prevent that from happen. Elena the subject of the problem was there that day. I did not confront Elena but rather, I went to her manager with my complaint. I doubt it if someone outside of Director James's encircle is willing to believe her story. In particular, after prior day I have been warned that I am going to be thrown out of the library if I get involved in any further problem (which they are the one who created all of the problems anyhow).

In addition, they have a repressive force that abuse homeless that I agree some of them loitering at the library but still, noone should be expelled by force nor abuse. On the Summer of 2014 Security "A" and "B" intention was to beat me up at the isolated parking lot site for no reason soever. Then, they would call the police and get me arrested.

I met Security "A" and "B" in the Summer of 2014. There was (or is I don't know) a female employee at the library which we acquainticed and we talked in a regular basis. I asked if we talk outside in a public place and she declined but at the same time she came up with the idea that we'd meet at the back door after she get off from work. I was there waiting for her but it was a very hot day so I moved to the parking lot under

the shadow. Soon after Security "A" appeared. Then she arrived and probably soon after Security "B" arrived too. There I was talking to this lady and I noticed that "A" and "B" were looking at us with belicose posture. We spoke around ten minutes and seeing that "A" and "B" continuous with the same posture I greeted them and inmediately they approached us. Just to realize the way they were addressing me I told her to leave. Secutity "A" and "B" aggressively asked me numerous questions and I polite stated to them that I understand their concern for security but the indication given while I was talking to a library's employee it should give them indication that I am looking for a wife, not to create a problem no engage in any criminal activity at the parking lot. I wanted leave and they did not leave alone, they asked me for ID. I responded them that based on their radio I assume they are library's security but I am not sure, identify yourself first. At my request they felt disrespected and demanded even more aggressively my ID. I was at an isolated place Mr. Hill with these two escalating person so I thought that I'd be better showing them my ID. They never identified themselves.

Next day (2014) I spoke to Manager Hester and soon after I handed him over a written complaint against Security "A" and "B". I remember that first occassion I asked Manager Haster an answer to the complaint he said that the lady was questioned and she said something no favorable to me. I asked Manager Hester what was the base for questioning her, we were talking fine until "A" and "B" showed up. Here is where she works and this is a scandalous that could adversely affect her job. She can say whatever sound nice to your ear trying to protect her job. Your are a manager here that can cause her trouble.

Regarding Security "A" and "B", and Manager Hester, the rest is story written in enclosed letter.

On the 20 of this month while I talk with Manager Hester "A" and "B" showed their same aggressive behavior and Manager Hester allowed it. He was unwilling to restrain them and yet, felt enjoyment for such display of power by his subordinates.

As Simpsonville branch employees, everytime their lack of job performance is brought to their attention out of their own wrongdoings they get offended and want retribution. At the library they use their privileged power and which its leadership allow them to misuse without, having any source of investigation.

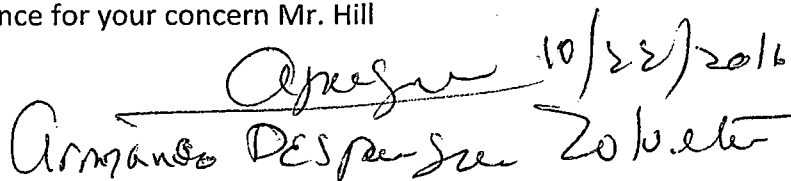
In another hand, Mr. Hill, let me introduce you a little bit of what is going on at Simpsonville branch. Most of the time after 8:00 P.M. the library is almost empty, most time at this hour 1-3 people only be there using the computer. The personell over

there soon after 8:00 P.M. they start to turn the computers off. In this situation, people like me who arrives at this hour and are familiar with the library would turn the computer on. For the contrary, newly members or non familiar people with the library most of the time would go back home thinking that the time for using the computer is over. These employees won't do nothing to make people aware the computers still usable on time. Meanwhile, these library's employees ladies are either navigating in computer watching Soap Opera, fashion show, etc., or at the back of the room they are gathered and having good time while talking. In particular me, during this time if I go there and interrupted this kind of activity asking for let me use the staple, help me with the copy machine that doesn't want to work, etc., they think that something is wrong with me and I am bothering them. They would feel that I shouldn't have interrupted their enjoyment. This situation would happen to me in normal library hours anyhow. Now add this situation with Security "A" and "B" campaign of character of assassination against me. (I give notice that not all the library's employees are that way).

At least, I would like to have my library's privileges back. A letter of reprimend for each library's employee (including Director James) involved in these incidents. A letter of apology issue to me, and copy of send to Simpsonville Police Department. Security "A", and Security "B" incidents be exposed.

Thanks in advance for your concern Mr. Hill

Sincerely;

Handwritten signature of Armando D. Zulveta with the date 10/22/2016.

Armando D. Zulveta

(PS) Mr. Hill let me tell you a secret. Although I stay away from the subject while defending myself, I haven't ever had so much trouble with people than now when the issue of Immigrants is on the News and at every program on tv everyday. Immigration is the politicians' daily talk. I just know how to deal with it and of course, that is an insignificant group of people compared with the population who engages in this kind of activity but being a small group of individuals they make a lot of noise and also, make someone's life miserable. I give notice that the worse enemy Jesus had was his own people, Jews.

Armando D Zulveta

OCTOBER 22, 2015

P.O. BOX 24892

Winston -Salem, NC 27114

Email: acere1296@gmail.com

Bob Taylors, Chairman

Greenville County Council

301 University Ridge, Suite 2400

Greenville, SC 29601

RE: COMPLAINT AGAINST GREENVILLE COUNTY LIBRARY SYSTEM'S EXECUTIVE DIRECTOR BERVELY JAMES FOR:

a) ABUSE OF AUTHORITY b) BLOCKING A GREENVILLE'S RESIDENT ACCESS TO GREENVILLE COUNTY LIBRARY c) BLOCKING A GREENVILLE'S RESIDENT ACCESS TO FILE GRIEVES AGAINST GREENVILLE COUNTY LIBRARY SYSTEM'S EMPLOYEES d) RETALIATION e) INTIMIDATION f) HARRASSMENT g) SLANDER h) DEFAMATION OF CHARACTER i) ISSUED ADVERSE SANCTION AFTER THE FACT OF HAVING NO ACKNOWLEDGEMENT OF THE INCIDENT J) LACK OF LEADERSHIP k) PROVIDE FALSE STATEMENT TO SIMPSONVILLE CITY 'S LAW ENFORCEMENT l) FILED AN UNLAWFUL TRESPASS WARNING NOTICE k)VIOLATION OF CIVIL RIGHTS.

Since 2010 I am a frequent visitor of Greenville County Library System. I had never had a single incident until after, in the Summer of 2014 I had an unpleasant encounter with Library's Security "A" (White Male, overweight, age early 50's, pony tail hair style) and Security "B" (African American, age late 30's, muscular built, short hair cut, wears glasses) in which I managed to get out of trouble without suffered any physical harm as their intention were for no reason soever.

Next day over the subject I filed a written complaint and personally handed over to Greenville Library's Operation Manager Greg Hester. Over a period of time on several

occasions I asked Manager Hester the whereabouts of my complaint. Each time I was told: "We are still investigating".

Over the months I lost interest on the subject even though, a great deal of hostile attention was given me by Security "A", and/or "B", at different library branches. At the same time I noticed that mainly at Simpsonville branch denial of services were given me by some employees. Each time polite I requested those rightful service be restored to me.

On or about February, 2015 I lost 2 hours of paperwork due to my computer was shutted down around 20 minutes before the hour 9:00 P.M. Being Spanish my first language I asked for help to Hispanic employee Elena and she said that sometimes the computer does it itself. That day I was unable to retreat my work. On another occasion it happened again without I suffered any work lost.

One occasion I mentioned Elena that everytime she gets next to me putting books at the shelves I notice that she focus on my paperwork on top of the table. I mentioned that perhaps there is curiosity of her part wondering what is on my papers but, it shouldn't have been done that. She also gave me the impression that through her computer she was looking my computer work. To this day, I have no idea if she is able to do it but that was the impression I got.

Months ago I made a comment to another Spanish employee regarding the rude treatment Elena was given me. I am not sure if she remember that comment.

On October 19, 2015 around 8: 40 P.M. I arrived to Simpsonville branch to check my Email. I bypassed Elena who according to the impression of her face she showed disapproval to my arrival at this hour. Moments later with her usually unpleasant face and voice she told me that computer should be turned off 10 minutes to the hour 9:00 P.M. I TURNED THE COMPUTER OFF ANYHOW. At the same time I expressed my disagreement since Greenville City's ordinance states at the library's door hours business from 9:00 A.M. to 9:00 P.M. Also, I reminded Elena that in the past I have lost my work due to computer have been shutted down by them even prior 10 minutes to the 9 P.M. hour.

Next day on October 20, 2015 around 3:30 P.M. at Greenville Library location Operation

Manager Greg Hester got me out of my computer for the purpose of addressing Elena's incident. Manager Hester took me behind the plastic wall and there were Security "A" and "B". Due to prior experience I clearly laid down my objection of conducting a conversation in front of Security "A" and much less, in front of Security "B", I fearing his militarized and repressive conduct not only exercised against me, also because I witnessed he used physical force against a homeless for no reason soever (sometimes around this year on January- February Security "B" using the F... word chest bumper out of the library what it appears to be a homeless who was coming out of the door on his own feet. Whatever the homeless has done inside there was no need for physical force). Manager Hester declined my request to conduct the conversation away from Security "A" and "B" while stated: "It is OK for them to be around". Manager Hester stated that I did not turned the computer off when Elena instructed me to do so. I contradicted Elena's statement and as result Security "A" and particularly "B", started showing their hostile body language behavior, impatience, while looked straight at me.

Minutes later I mentioned Manager Hester that Security "A" and "B" hostile body language make me feel uncomfortable, I asked to move our conversation away from them. Manager Hester agreed and we moved away from them. Minutes later Security "A" and "B" approached us with their same aggressive behavior and Security "B" stated: "Next time you have a problem with a library's staff we will call the police and get you removed and banned from Greenville library". I answered Security "B" that I am addressing Elena's subject with his superior and he hasn't found a motive to make this kind of decision. Security "B" felt his authority has been challenged and he wanted retribution. Security "A" moved even close while Security "B" approaching me stated: "This conversation comes to an end, let's move out of here" At this moment I reminded Manager Hester that this is the same similar threatening conduct at an isolated place outside of the library I received from them in the Summer of 2014 and again now, in which I was inches away form being physically harmed by Security "A" and "B" for no reason soever. I mentioned to Manager Hester that over the subject I filed a written complaint and handed over to him (Manager Hester) and never had an answer even after him being asked (Manager Hester) several times for. That right now he (Manager Hester) is allowing his subordinates whose job is security to take over and forcefully finish our meeting. After I said this, I thought that it was time to I get out from behind the isolated plastic wall if I wanted to stay in one piece. There was an intent from Security "B" to stop me from leaving which I ignored, kept going.

Down stair I asked Manager Hester to speak with his superior. He said his superior is not around, why this request. I stated that last year he (Manager Hester) failed to process

my grieves. That today his subordinates have taken over our meeting, finish it, and he allowed. That he has shown neither leadership nor willingness to solve any problem but rather, escalate it. I am going to write a complaint against you, and also against Security "A", and "B" with your superior. After my insistence, Manager Hester reluctantly handed me over his superior card (SEE EXHIBIT "A" EXECUTIVE DIRECTOR BEVERLY JAMES' CARD GIVEN ME BY MANAGER HESTER ON OCTOBER 20, 2015 FOR THE PURPOSE TO I FILE A COMPLAINT AGAINST THEM).

Following day on October 21, 2015 around 11:15 A.M. I went to Simpsonville branch to address Elena's incident with the manager. Assistant Manager Lina Bertinelli was in charge that day. We have a conversation in which I let her know that over Elena's untrue statement I have been threaten with a trespass Notice. I insisted that surveillance camera must be viewed finding out the fact. Asst. Manager Bertinelli stood behind Elena's untrue statement and also gave me no indication of any willingness to find out the true nor doing any investigation. Out of her unprofessional posture I asked Asst. Manager for her card, and Elena's name (at the time I did not know their name). She asked me why I want their name. I answered that noone is willing to find out the true and I am going to file a complaint against you, Elena, and Greenville County Library's Director for blocking my access to the library's computers when forced me to turn the computer off before 9:00 P.M. which hour is a Greenville City's Ordinance and it is being violated by Greenville Library's staff and employees. If Greenville City wants the computers being shutted down 10 minutes before 9:00 P.M. it would have enacted an ordinance and it will be posted, written at a visible place so the incident with Elena and this conversation we have now it would not occur. I added: "I will send copy of the complaint against each one of you to Greenville City Council". (SEE EXHIBIT "B" SIMPSONVILLE'S BRANCH'S ASSISTANT MANAGER LINA BERTINELLI'S CARD HAVING ELENA NAME WRITTEN ON IT FOR THE PURPOSE OF I TO FILE A COMPLAINT AGAINST ELENA, ASST. MANAGER BERTINELLI, AND EXECUTIVE DIRECTOR BEVERLY JAMES. THE CARD WAS GIVEN ME BY ASST. MANAGER BERTINELLI ON OCTOBER 21, 2015).

Following day on October 22, 2015 at Simpsonville's branch after I did some paperwork work I was about to write this complaint when Security "B" came from out of nowhere since he was not in duty there and accompanied by Law Enforcement Police Officer Tedrow asked me to turn the computer off and come outside with them. I was served

with a copy of WARNING NOTICE OF TRESPASS (SEE EXHIBIT "C").

Here is the issue. In the Summer of 2014 after I filed a complaint with Manager Hester against Security "A", and "B", at every branch we met I was the focus of their attention. They made their business to openly slander, assassinate my character with Library's employees and had some of them to jump on their wagon in support of this wrongdoing. What Security "B" in conjunction with Executive Director Beverley James they call MULTIPLE INCIDENTS OF AGGRESSIVE AND INTIMIDATING BEHAVIOR TOWARD LIBRARY STAFF" in fact it is called "DENIAL OF PUBLIC SERVICES TO A GREENVILLE COUNTY'S RESIDENT BY SOME LIBRARY'S EMPLOYEES WHO SHOW SOLIDARITY, CAMARADERIE WITH SECURITY "A, and "B" CHARACTER ASSASSINATION TOWARDS ME". (i.e;) denial to use the staple, denial to provide me a deposit receipt amount after copy machine was out of paper as commonly happen at Simpsonville branch among other things, I be the focus of hostile attention while Security "A", and/or "B" be around. Shut my computer down long before 10 minutes to the 9 P.M hour. Be the focus of mockery, joke, making faces when I speak to them with my broken English. Create a hostile library's environment against a Greenville County's resident, etc. My answer to these employees's denail of services and rude treatment was polite: "You have a job to do helping people in this library".

Assassination of character always has been an easy way to destroy people by one who has the microphone, against another one who apparently has not voice.

With all due respect to Director James, most likely than not she knew that I was about to file a complaint against she, her Operation Manager Greg Hester, Simpsonville branch Assistant Manager Lina Bertinelly, leaders of this library. Director James knew that said complaints' copy will be forwarded to Greenville City Council's members. On the Summer of 2014 her leadership disregarded my filed complaint of wrongdoings against her repressive force Security "A" and "B". Actually, the filing of my complaint for wrongdoings would directly implicates her. As result, I could not walk away from the conclusion that Executive Director Beverly James wilfully engaged in an unlawful action trying to silent a Greenville County's resident's voice against her failure of leadership, abuse of the public, failure to address the public's grieves. In the process, with false statement she misled Simpsonville City' Law enforcement for the purpose of gain

personal benefit.

Excutive Director Berveley James uses of her office to render a personal and unlawful retaliatory attack against a Greenville's resident who is exercising his right, voice his concern in a civilize matter it is detriment to the society and this type of arbitrary leader should not, hold such high office in a society. Her position is going to be use to destroy others including co-workers every time she is confronted to her unprofessionalism, unfairness, efficient to conduct city's business. I urge this Greenville City Council to send a clear message to officials like Executive Director Berveley James who uses the power that this community has trusted upon and Director James rather uses to commit unilateral and abusive decision against its own residents.

Unless someone try to make the grave mistake of delete surveillance cameras' tapes that show the time of when these personal cards were handed over and the library's employees who issued them to me these are my demands for Greenville City Council: a) MY PRIVILEGES OF HAVING ACCESS TO GREENVILLE COUNTY LIBRARY SYSTEM'S AREA BE RESTORED b) GREENVILLE COUNTY LIBRARY SISTEM'S LETTER OF APOLOGIZE BE ISSUED TO ME, ON MY NAME, AS WELL AS SEND A COPY OF TO SIMPSONVILLE POLICE DEPARTMENT c) EXECUTIVE DIRECTOR BEVERLY JAMES BE TERMINATED FROM HER POSITION. d) ANY AND ALL INCIDENTS IN WHICH A WRITTEN NOTICE OF TRESPASS AT ANY BRANCH HAVE BEEN ISSUED BE TURNED OVER TO GREENVILLE COUNTY COUNCIL AND GREENVILLE COUNTY 'S LAW ENFORCEMENT DIVISION FOR ITS REVIEW e) ANY ALL INCIDENT AT EVERY BRANCH IN WHICH SECURITY "A" and SECURITY "B", THEY HAVE BEEN INVOLVED BE TURNED OVER TO GREENVILLE CITY COUNCIL AND GREENVILLE COUNTY'S LAWN ENFORCEMENT DIVISION FOR ITS REVIEW. ANY OTHER ACTION GREENVILLE CITY COUNCIL DEEMS AS APPROPRIATE.

On this day the 22nd of October, 2015

CC: Library Board of Trustees

Greenville County Library System

25 Heritage Green Place

Greenville, SC 29601

Armando D Zulveta

November 12, 2015

P.O. Box. 24892

Winston-Salem, NC 27114

Email: acere1296@gmail.com

Bob Taylors, Chairman

Greenville County Council

301 University Ridge, Suite 2400

Greenville, SC 29601

RE: COMPLAINT AGAINST PRESIDING HEARING'S ATTORNEY S. ALLAN HILLS.

On November 09, 2015 date of hearing APPEAL NOTICE OF NOT TO TRESSPASS PUBLIC LIBRARY Presiding Hearing's Attorney S. Allan Hill conducted himself in an unethical matter at the hearing.

His behavior, conduct, was rude and unprofessional. One occasion Presiding Attorney Hill was asked to allow use his pen to Armando D Zulveta. With disdain, visible irritated, Presiding Hearing Attorney Hills thrown his pen at my direction I being basically next to him.

Greenville Library Hearing's Presiding Attorney S. Allan Hills is bound by South Carolina Rules of Appellate Court. Particularly as an attorney he is a judge himself. Therefore, misconducting that way, Attorney Hills is in violation of:

South Carolina

JUDICIAL DEPARTMENT

**V. Rules Governing the Judiciary, Employees of the Judicial Department, and Others Assisting the Judiciary 501 Code of Judicial Conduct**

CANON 1

**A JUDGE SHALL UPHOLD THE INTEGRITY AND INDEPENDENCE OF THE JUDICIARY**

A. An independent and honorable judiciary is indispensable to justice in our society. A judge should participate in establishing, maintaining and enforcing high standards of conduct, and shall personally observe those standards so that the integrity and independence of the judiciary will be preserved.

**CANON 2**

**A JUDGE SHALL AVOID IMPROPRIETY AND THE APPEARANCE OF IMPROPRIETY IN ALL OF THE JUDGE'S ACTIVITIES**

A. A judge shall respect and comply with the law\* and shall act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary.

**Commentary:**

Public confidence in the judiciary is eroded by irresponsible or improper conduct by judges. A judge must avoid all impropriety and appearance of impropriety. A judge must therefore accept restrictions on the judge's conduct that might be viewed as burdensome by the ordinary citizen and should do so freely and willingly.

In addition, presiding the hearing Attorney Hills shown bias against Armando Despaigne Zulveta that benefitted Executive Director Beverley James. Presiding Hearing attorney Hills acted as Executive Director Bervely James's lawyer and also, my prosecutor and judge positions combined. He was there protecting, speaking on Director James' behalf in violation of:

**CANON 4**

**A JUDGE SHALL SO CONDUCT THE JUDGE'S EXTRA-JUDICIAL ACTIVITIES AS TO MINIMIZE THE RISK OF CONFLICT WITH JUDICIAL OBLIGATIONS**

**A. Extra-Judicial Activities in General. A judge shall conduct all of the judge's extra-judicial activities so that they do not:**

**(1) cast reasonable doubt on the judge's capacity to act impartially as a judge;**

**(2) demean the judicial office; or**

**(3) interfere with the proper performance of judicial duties**

Expressions of bias or prejudice by a judge, even outside the judge's judicial activities, may cast reasonable doubt on the judge's capacity to act impartially as a judge

In this and other Sections of Canon 4, the phrase "subject to the requirements of this Code" is used, notably in connection with a judge's governmental, civic or charitable activities. This phrase is included to remind judges that the use of permissive language in various Sections of the Code does not relieve a judge from the other requirements of the Code that apply to the specific conduct.

The prohibition against behaving with impropriety or the appearance of impropriety applies to both the professional and personal conduct of a judge.

B. A judge shall not allow family, social, political or other relationships to influence the judge's judicial conduct or judgment. A judge shall not lend the prestige of judicial office to advance the private interests of the judge or others; nor shall a judge convey or permit others to convey the impression that they are in a special position to influence the judge. A judge shall not testify voluntarily as a character witness. (THIS RULE SQUARELY APPLIES TO EXECUTIVE DIRECTOR BEVERLEY JAMES WHO SHARES A SEAT AT THE GREENVILLE LIBRARY'S BOARD OF TRUSTEES'S TABLE WHILE THE HEARING IS CONDUCTED. DIRECTOR JAMES IS A DEFENDANT).

Commentary:

A judge must avoid lending the prestige of judicial office for the advancement of the private interests of others.

Conclusion.

Armando D Zelveta demands at the hearing be treated with dignity, respect, and without bias by Hearing Presiding Attorney S Allan Hills. SOUTH CAROLINA SUPREME COURT'S OFFICE OF THE DISCIPLINARY COUNSEL takes very seriously such misconducts, miscarriage of justice at a Hearing.

On this date the 12 of November, 2015

Respectfully submitted;

*Armando Despoigne Zelveta* 11/12/2015

CC: Joe Allen, Chair Library Board of Trustees

Greenville County Library System 25 Heritage Green Place Greenville, SC 29601

Board of Trustee  
 Greenville City Council  
 Bob Taylors, Chairman

GREENVILLE MAIN POST OFFICE  
 GREENVILLE, South Carolina  
 296029998  
 4518030270-0097  
 10/26/2015 (864)282-8414 04:31:17 PM

Sales Receipt		
Product Description	Sale Unit Qty Price	Final Price
GREENVILLE SC 29601 Zone-1 First-Class Mail Large Env 3.50 oz. Expected Delivery: Wed 10/28/15		\$1.64
Issue Postage:		\$1.64
GREENVILLE SC 29601 Zone-1 First-Class Mail Large Env 3.40 oz. Expected Delivery: Wed 10/28/15		\$1.64
Issue Postage:		\$1.64
GREENVILLE SC 29602 Zone-0 First-Class Mail Large Env 5.80 oz. Expected Delivery: Wed 10/28/15		\$2.08
Issue Postage:		\$2.08
CHARLESTON SC 29492 Zone-3 First-Class Mail Large Env 5.60 oz. Expected Delivery: Wed 10/28/15		\$2.08
Issue Postage:		\$2.08
GREENVILLE SC 29602 Zone-0 First-Class Mail Large Env 5.80 oz. Expected Delivery: Wed 10/28/15		\$2.08
Issue Postage:		\$2.08
GREENVILLE SC 29601 Zone-1 First-Class Mail Large Env 5.50 oz. Expected Delivery: Wed 10/28/15		\$2.08
Issue Postage:		\$2.08
GREENVILLE SC 29603-0589 Zone-1 First-Class Mail Large Env 11.10 oz. Expected Delivery: Wed 10/28/15		\$3.40
Issue Postage:		\$3.40
<b>Total:</b>		<b>\$15.00</b>
<b>Paid by:</b>		
Cash		\$20.00
Change Due:		-\$5.00

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**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

**GREENVILLE, SC 29601**

Certified Mail Fee \$3.45

Extra Services & Fees (check box, add fee to appropriate rate):

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$0.71

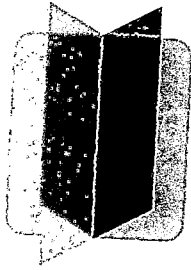
Total Postage and Fees \$6.96

Sent To: **Bob Taylors, Chairman Greenville Co. COUNCIL**  
 Street and Apt. No., or PO Box No. **301 UNIVERSITY RIDGE, SUITE 2400**  
 City, State, ZIP+4® **GREENVILLE, SC 29601**

Postmark Here: 11/12/2015

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

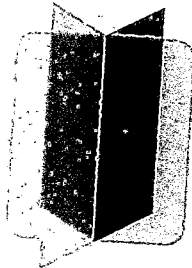
Elena



Greenville County Library System  
864-242-5000  
www.greenvilibrary.org

**Lina Bertinelli**  
ASSISTANT BRANCH MANAGER

Simpsonville (Hendricks) Branch  
626 NE Main Street  
Simpsonville, SC 29681  
864-963-9031  
864-228-0986 (f)  
lbertinelli@greenvilibrary.org

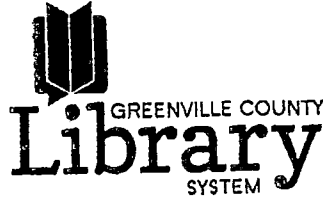


Greenville County Library System  
864-242-5000  
www.greenvilibrary.org

**Beverly James**  
EXECUTIVE DIRECTOR

Hughes Main Library  
25 Heritage Green Place  
Greenville, SC 29601  
864-527-9231  
864-235-8375 (f)  
bjames@greenvilibrary.org

Tedrow el sara Oct. 21, 15 at 6:40 P.M



TRESPASS WARNING NOTICE NOT TO ENTER PUBLIC LIBRARY

IN ACCORDANCE WITH SC CODE OF LAWS 16-11-625

NAME: Armando Zulveta

This Trespass Warning Notice is effective as of today, 10-22-15 through Permanent

If you enter any Greenville County Library System (GCLS) facility during this period you will be charged with trespass and may be arrested. This warning is based on the alleged criminal law violation(s) or violation(s) of the GCLS Code of Conduct cited below.

REASON FOR WARNING: [include date(s) and location(s)]

Multiple incidents of aggressive and intimidating behavior toward library staff

LIBRARY REPRESENTATIVE:

LIBRARY REPRESENTATIVE TITLE: (Check one)

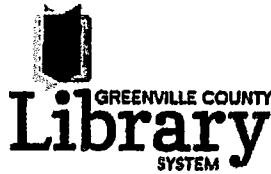
- Director, Acting Director, Branch Manager, Acting Branch Manager in consultation with Director

LAW ENFORCEMENT OFFICIAL SIGNATURE: CASE #:

RIGHT TO APPEAL:

If you wish to appeal this warning you must submit a written request for a hearing to the Library Board of Trustees within five (5) business days of receiving this notice.

Submit appeals in writing to: Library Board of Trustees, Greenville County Library System, 25 Heritage Green Place, Greenville, SC 29601



November 30, 2015

SENT VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Armando D. Zulveta  
P. O. Box 24892  
Winston-Salem, NC 27114

Dear Mr. Zulveta:

During the Library Board's special called meeting on November 9, 2015 to hear your trespass notice appeal, you requested the Library to provide you with a Spanish-speaking interpreter. In order to accommodate your request, the Library Board recessed the hearing and decided to reconvene it at 12:00 Noon, December 14, 2015. Before you left the Library Board meeting, you stated that you would be in attendance and were given the date/time in writing.

This letter serves as confirmation that a professional Spanish-speaking translator will be provided for you at the Library Board's reconvened hearing regarding your appeal of the Trespass Warning Notice issued to you on October 22, 2015. The hearing will be held during a special called Library Board meeting on December 14, 2015 at 12:00 Noon in the Board Room of the Hughes Main Library, 25 Heritage Green Place, Greenville, S.C.

To further clarify the reason you were issued a Trespass Warning Notice ("multiple incidents of aggressive and intimidating behavior toward library staff"), listed below are examples of the prohibited activities and behaviors included in the Library System's *Code of Conduct*, which you have exhibited between the period of January 2014 and October 2015:

- o Failing to heed requests of Library staff in relation to potential Code of Conduct violations or other Library business.
- o Using obscene or abusive language or engaging in obscene/intimidating actions.
- o Creating disruptive noises such as loud talking, screaming or banging on Library furnishings.
- o Interfering in any way with the free movement of others.
- o Persistent staring at others or following others around.

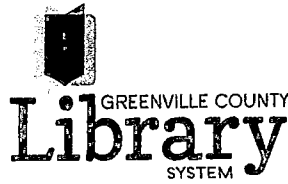
Sincerely,

A handwritten signature in cursive script that reads "Joe Allen".

Joe Allen, Chair  
Library Board of Trustees

CC: Armando D. Zulveta  
24 Hollywood Circle Apt. A  
Greenville, SC 29607-7300

SENT VIA EMAIL TO: [acere1296@gmail.com](mailto:acere1296@gmail.com) and [zularmando@yahoo.com](mailto:zularmando@yahoo.com)



December 16, 2015

SENT VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED  
SENT VIA EMAIL TO [acere1296@gmail.com](mailto:acere1296@gmail.com);  
[zularmando@yahoo.com](mailto:zularmando@yahoo.com)

Armando D. Zulveta  
P. O. Box 24892  
Winston-Salem, NC 27114

Dear Mr. Zulveta:

This letter serves to notify you of the Library Board of Trustees' decision regarding your appeal of the Trespass Warning Notice issued to you.

Following their 12/14/15 continued hearing of your appeal, initially held 11/9/15, the Library Board voted to sustain the Trespass Warning Notice you received on 10/22/15.

Sincerely,



Chace Campbell, Chair  
Library Board of Trustees

cc: Armando D. Zulveta  
24 Hollywood Circle Apt. A  
Greenville, SC 29607-7300

# EXHIBIT "C"

STATE OF SOUTH CAROLINA  
COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS  
THIRTEENTH JUDICIAL CIRCUIT

Armando Despaigne Zulveta )

)

vs.

) File No.: 2015-CP-23-05171

)

Charter Communications, LLC)

-----

NOTICE

Notice is hereby given that the plaintiff in the above-captioned case Pursuant to ADR Rule 4(c) Selection or Appointment of Neutral hereby moves this court requesting the appointment of two more mediators. Plaintiff Armando Despaigne Zulveta respectfully submit the following Memorandum of Support of Law of said NOTICE.

On this day the 27 of April, 2016

Respectfully Submitted;

*Armando* <sup>ADZ</sup> 04/27/2016  
Armando DESPaigne Zulveta  
04/27/2016

FILED-CLERK OF COURT  
PAUL B. H. ...  
2016 APR 27 PM 3 54

STATE OF SOUTH CAROLINA      IN THE COURT OF COMMON PLEAS  
COUNTY OF GREENVILLE   THIRTEENTH JUDICIAL CIRCUIT

Armando Despaigne Zulveta )

)

vs.

) File No.: 2015-CP-23-05171

)

Charter Communications, LLC )

FILED  
CLERK OF COURT  
COUNTY OF GREENVILLE  
SOUTH CAROLINA  
2016 APR 27 PM 3 54

PLAINTIFF ZULVETAS MEMORANDUM OF LAW IN SUPORT OF NOTICE, REQUESTING THE APPOINTMENT OF TWO MORE MODERATORS.

Plaintiff Armando Despaigne Zulveta respectfully submit the following Memorandum of Support of NOTICE.

STANDARD OF REVIEW

To avoid repetition Plaintiff-Appellant Zulveta refers this Court to filed documents pertaining to File No.: 2015-CP-23-05171.

- a) On 4/13/2016 Defendant's attorney Yarbrough's sent electronic mail to Plaintiff Zulveta in which she states: "I am happy to consider any qualified mediator that you recommend" (SEE EXHIBIT "A").
- b) On 4/14/2016 Plaintiff Zulveta received NOTICE OF ADR (See Order of the Court)
- c) On 4/14/2016 Plaintiff Zuleveta sent an electronic mail to Charter Communications LLC Attorney Michelle Yarbrough in which clearly it states: "Plaintiff Zulveta has no money for mediator" (SEE EXHIBIT "B" electronic mail).
- d) On 04/18/2016 due to lack of familiarity with the process of mediator Plaintiff Zulveta requested from attorney Yarbrough her cooperation, help conducting proper procedure. In addition, "Plaintiff Zulveta has no money" is stated. (SEE EXHIBIT "C" electronic mail).
- e) From there Defendant's attorney Yarbrough as usual tried to lure Plaintiff Zulveta

into a judicial's ambush (SEE EXHIBIT "D" and "E" attorney Yarbrough electronic mails date 04/22/2016 and 04/24/2016 respectively).

f) (SEE EXHIBIT "F") Plaintiff demands dated 04/25/2016 at 11:25 A.M.

g) (SEE EXHIBIT "G") dated 04/25/2016 at 6:07 P.M., electronic email from attorney Yarbrough providing some sort of explanation from mediation and also she stated: "I will call Mr. Marvel tomorrow to ask about May 05, 20, and 25 as possible mediation date"

Since according to EXHIBIT "G" mediator Mr. Marvel would receive the information next day Plaintiff Zulveta on the same 04/25/2016 at 11:23 P.M. notified attorney Yarbrough of: "NOT TO MAKE AN APPOINTMENT WITH MR. MARVEL". (SEE EXHIBIT "H").

Plaintiff Zulveta would like to notice this court that besides of Defendant's attorney Yarbrough has no patient, no tolerance, nor proper judicial conduct to listen Plaintiff Zulveta while conducting business none of us, including mediator David B. Marvel has the ability to conduct a fair hearing without a translator. In addition while we talk, and it gets worse over the phone while speak often Plaintiff Zulveta hear from attorney Yarbrough: WHAT! or, I CAN NOT UNDERSTAND WHAT YOU SAY!

Plaintiff Zulveta and attorney Yarbrough we had several conversations over the phone and Attorney did not keep her verbal promises conducting the hearing but trying to cheat again as usual. (SEE EXHIBIT "I")

1) Since begin it can be seen that due to financial issue Plaintiff Zulveta can not participate in the mediation. In Addition, according to attorney Yarbrough electronic mails she is not consistent with: ADR Rule 2 Definition (i) Alternative Dispute Resolution (ADR) Conference. A mediation or arbitration. Arbitration conferences may also be referred to as hearings.

2) Attorney Yarbrough wanted to do the mediation by phone, that is not in accordance with a hearing required by Plaintiff language barrier. Attorney Yarbrough is not in accordance with: Rule 6 Duties of the Parties, Representatives and Attorneys – Mediation (b) Attendance. The following persons shall physically attend a mediation settlement conference Purposes of the circuit: (1) The mediator; (2) All individual parties;

3) Rule 10

Sanctions

(b) Sanctions. If any person or entity subject to the ADR Rules violates any provision of the ADR Rules without good cause, the court may, on its own motion or motion by any party, impose

upon that party, person or entity, any lawful sanctions, authorized by Rule 37(b), SCRPC.

4) In violation of Lakes v. State, 333 S.C. 382,384,85,510 S.E.2d 228, 230 (CT.App.1998) (stating an order to denying a request to proceed in forma pauperis itn discontinue the action) Greenville Circuit Court denied Plaintiff Zulveta's Motion and Affidavit to Proceed in Form Pauperis Order files 02/09/2016 and related Motion for Consideration filed date 02/23/2016. Plaintiff Zulveta has no money to proceed this case and this case is in the South Carolina Court of Appeals anyhow having the 300 days near

04/27/2016

(SEE EXHIBIT "J" AND "K" Denial ADZ

5) Following attorney Yarbrough's suggesstion Plaintiff Zulveta make numerous calls looking for a mediator, among others:

Arbitration Services Mediation (864) 349-2600 Thomas Stevenson

(864) 370-9400, (864) 235-2600,

(864) 877-3355 Rustin Duncan-Fernando

(864) 271-4100 attorney Clark

(864) Carl B. Epps (803) 255-9751 (Court appointed mediator)

David B. Marvel (843) 853-4877

After many mediators that offered help with the mediation Plaintiff Zulveta was forced to choose David B. Marvel, this court appointed translator. I was the result of defendant's attorney decision to not to, hire one of my mediator. No goog faith to mediate.

Therefore, Plaintiff Zulveta requests this court that two more mediators be appointed upon this request.

On this day the 28, of April, 2016

Respectfully Submitted

*Armando Despaigne Zulveta*  
Armando Despaigne Zulveta  
04/28/2016 ADZ

ADZ  
04/27/2016

AFFIDAVIT

FILED IN COURT  
PAGE 5

2016 APR 27 PM 3 54

I, Armando Despaigue Zulver, being first duly sworn, state as follows: NC DL-0000 48105786  
Exp. 01.21.2024

That everything stated and related to South Carolina Commission's Commissioner Mike Campbell's Health care Misconduct on his presideing hearing dated December 09, 2015 is true and correct.

I certify that, under the penalty of perjury of the law of the STATE, that the above written statements herein are true and accurate to the best of my knowledge.

STATE OF South Carolina

COUNTY OF Greenville

Armando, being duly sworn, or having duly affirmed to tell the truth, stated personally before me that they are competent under the law to give this affidavit and unless stated have personal knowledge of the facts stated herein:

Sworn or affirmed before me on 04/27/2016.

Rolando Dell

Notary Public

Commission Expires: 12/09/2022

Armando Despaigue Zulver  
04/27/16

STATE OF SOUTH CAROLINA  
COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS

NOTICE OF ADR

Armando Despaigne Zulveta

2015CP2305171

PLAINTIFF(S)

Filing Date: August 21, 2015

VS  
Charter Communications Inc

DEFENDANT(S)

Pursuant to the South Carolina Alternative Dispute Resolution Rules (SCADR), you are required to participate in the following methods of Alternative Dispute Resolution (ADR): mediation or arbitration (binding or non-binding); on or before 300 days from the date of filing of this action. The parties have a right to mutually agree upon the form of ADR and a neutral person(s) to conduct that ADR process. In the event the parties are unable to agree upon the form of ADR, the court hereby designates mediation as the default process of ADR. In the event the parties are unable to agree upon a mediator, the court hereby appoints

Carl B. Epps III, PO Box 11070, , Columbia, SC 29211, Phone (803) 255-9751

to serve as mediator. In the event the aforementioned mediator has a conflict of interest or is unable to serve, the alternate mediator is

David B. Marvel, PO Box 22734, , Charleston, SC 29413, Phone (843) 853-4877

The parties and/or their lawyers shall contact the court-appointed mediator directly regarding scheduling and payment of the court-mandated fee.

A Rule to Show Cause why sanctions should not be imposed may be issued in all cases that fail to file a Proof of ADR or Exemption form indicating evidence of participation in or exemption from an ADR process within 300 days from the date of filing of the action or 90 days from the date of this notice 07/12/2016.

Date: 4/14/2016

\_\_\_\_\_  
CLERK OF COURT

Notice of this Order was given by facsimile transmission, or if no fax number is shown, by first class mail or email to the attorneys of record on 4/14/2016

Clerk's Initials \_\_\_\_\_

Plaintiff Attorney:  
Armando Despaigne Zulveta  
P.O Box 24892

Winston Salem, NC 27114

Defendant Attorney:  
Michelle Deluca Yarbrough  
Gallivan, White & Boyd, P.A.  
P.O. Box 10589

CP18  
SCADR 102 (11/2012)

EXHIBIT "A"



Gallivan, White & Boyd, P.A.  
ATTORNEYS AT LAW

On Wed, Apr 13, 2016 at 4:51 PM, Michelle Yarbrough <myarbrough@gwblawfirm.com> wrote:

Armando,

Mediation is mandatory in this case and must be done by July 12th. Mediators usually charge \$250 to \$300 per hour and their fee will be split between us. I am happy to consider any qualified mediators that you recommend. Please let me know when you want to mediate and which mediators you recommend so that we can get the mediation set.

Thank you,

Michelle Yarbrough

Michelle DeLuca Yarbrough

Partner

myarbrough@GWBlawfirm.com

Gallivan, White & Boyd P.A.

Office 55 Beattie Place | Suite 1200 | Greenville SC 29601

864 271 5349 Direct | 864 271 9580 Main | 864 271 7502 Fax

Mailing Post Office Box 10589 | Greenville SC 29603

vCard | BioURL | Website

This message is from the law firm Gallivan, White & Boyd, PA and may be a confidential and privileged legal communication to the named recipient(s). If you receive this message in error or are not the named recipient(s), please notify the sender and delete this email. Thank you.

EXHIBIT "B"

from: Armando Zulveta <acere1296@gmail.com>

to: Michelle Yarbrough <myarbrough@gwblawfirm.com>

date: Thu, Apr 14, 2016 at 12:18 AM

subject: Re: Notice of ADR 2015cp2305171

mailed-by: gmail.com

: Important according to our magic sauce.

On Thu, Apr 14, 2016 at 12:18 AM, Armando Zulveta <acere1296@gmail.com>  
wrote: >>>>>>

>>> I have no money to pay for mediator. Judges Hill and Stilwell do not allow me to proceed this case in Forma Pauperis. Unless Claimant Zulveta disqualified both of them trying to obtain the proceeding in Forma Pauperis A Stay of proceeding is placed in SC Court of Appeals regarding said subject.

EXHIBIT "C"

from: Armando Zulveta <acere1296@gmail.com>  
to: Michelle DeLuca Yarbrough <myarbrough@gwblawfirm.com>  
date: Mon, Apr 18, 2016 at 4:13 PM  
subject: ALTERNATIVE DISPUTE RESOLUTION (ADR)  
mailed-by: gmail.com

Armando Zulveta <acere1296@gmail.com>

Apr 18 (8 days ago)

to Michelle

Dear attorney Yarbrough:

Since Plaintiff Zulveta is not familiar with the process of mediator I would suggest you to conduct all proper procedure and let me know when we can be ready.

Plaintiff-Appellant Zulveta's plan is not, to stay for more than an hour discussing settlement. Plaintiff-Appellant Zulveta has been left without finances trying to maintain alive these cases. No even to Proceed in Forma Pauperis I am allow it.

Therefore, please have ready an answer for tomorrow.

Therefore, I would like to listen what Charter Communications, LLC has to say at the mediator's hearing as sooner as possible. This week if possible, please. If there is something I should be done regarding this subject please, cooperate letting me know it.

Mrs Yarbrough, notice that Plaintiff-Appellant Zulveta is doing an exception with you. The rest, is up to you.

EXHIBIT "D"



Gallivan, White & Boyd, P.A.  
ATTORNEYS AT LAW

Michelle Yarbrough <myarbrough@gwblawfirm.com>

Apr 22 (4 days ago)

to me

Armando,

I am having some difficulty understanding your correspondence. In some e-mails or text messages, you indicate that you do not plan to mediate. In other correspondence, it appears that you will agree to mediate. Can you please clarify your position on mediation for me? If you have a suggestion for a mediator, please let me know who you would like to use. With regard to the appeals, I believe you are confusing your claim in Federal Court with your claim in State Court. If you will just send me copies of your pleadings relating to the Charter claim, I would appreciate it.

Thank you,

Michelle Yarbrough

Michelle DeLuca Yarbrough

Partner

myarbrough@GWBlawfirm.com

Gallivan, White & Boyd P.A.

Office 55 Beattie Place | Suite 1200 | Greenville SC 29601

864 271 5349 Direct | 864 271 9580 Main | 864 271 7502 Fax

Mailing Post Office Box 10589 | Greenville SC 29603

EXHIBIT "E"



Gallivan, White & Boyd, P.A.  
ATTORNEYS AT LAW

Michelle Yarbrough <myarbrough@gwblawfirm.com>

Apr 24 (2 days ago)

to me

Armando,

We can either use a mediator of your choosing or we can use one of the two mediators listed on the mediation notice. Because the mediators or the mediation notice are out of town, it may be possible to do the mediation by phone. Please let me know who you want to use. You may want to consider a bilingual mediator so you do not have to bring an interpreter. Please let me know your choice of mediator and we will get it set up at a time convenient to everyone.

Thank you,

Michelle

Michelle DeLuca Yarbrough

Partner

myarbrough@GWBlawfirm.com

Gallivan, White & Boyd P.A.

Office 55 Beattie Place | Suite 1200 | Greenville SC 29601

864 271 5349 Direct | 864 271 9580 Main | 864 271 7502 Fax

EXHIBIT "I"

Armando Zulveta <acere1296@gmail.com>

to: Michelle Yarbrough <myarbrough@gwblawfirm.com>

date: Mon, Apr 25, 2016 at 11:25 AM

subject: Re: Notice of ADR 2015cp2305171

mailed-by gmail.com

Important according to our magic sauce.

Armando Zulveta <acere1296@gmail.com>

Apr 25 (1 day ago)

to Michelle

Demands Preview: a) No more than an hour talk since you already know my settlement numbers. b) If there is an agreement, dismissal is with prejudice until Plaintiff Zulveta gets fully paid, c) the settlement is binding d) Claimant Zulveta's merit is Gallivan, White & Boyd's and Judge Hill's corruption, bribery, racketeer, fraud, etc. Do not expect other talk.

EXHIBIT "9"



Gallivan, White & Boyd, P.A.  
ATTORNEYS AT LAW

On Mon, Apr 25, 2016 at 6:07 PM, Michelle Yarbrough  
<myarbrough@gwblawfirm.com> wrote:

Armando,

Mediation is a way to determine if the parties can reach a settlement agreement. Sometimes the parties are not able to reach an agreement. If you intend to demand anywhere near \$65K or \$75K, we will not be able to reach a settlement agreement. If you want to settle for somewhere in the range of \$500, we should be able to reach an agreement. I will call Mr. Marvel tomorrow to ask about May 5, 20, and 25 as possible mediation dates. It is my understanding that this mediation will take place via telephone since Mr. Marvel works in Charleston, SC. You will be responsible for ½ of the mediation fees and I will be responsible for the other ½ of the fees.

Thank you,

Michelle Yarbrough

Michelle DeLuca Yarbrough

Partner myarbrough@GWBlawfirm.com

Gallivan, White & Boyd P.A.

Office 55 Beattie Place | Suite 1200 | Greenville SC 29601

864 271 5349 Direct | 864 271 9580 Main | 864 271 7502 Fax

Mailing Post Office Box 10589 | Greenville SC 29603

vCard | BioURL | Website

# EXHIBIT "H"

from: Armando Zulveta <acere1296@gmail.com>  
to: Michelle Yarbrough <myarbrough@gwblawfirm.com>  
date: Mon, Apr 25, 2016 at 11:13 PM  
subject: Re: Notice of ADR 2015cp2305171  
mailed-by: gmail.com

I really apologize for bother Mr. Marvel. I always thought that it was bad idea for you to recommend me to call Mr. Marvel and initiate the meeting because unlike defrauder of victims Charter Communications, LLC , and corrupt Gallivan who you represent, Plaintiff Zulveta has no more money to be defrauded. The person who was about to loan me some money changed mind because there is a belief that the corrupt system can not be beaten. Call Mr. Marvel for me please and tell him that the mediation is cancel.

EXHIBIT "I"

from: Armando Zulveta <acere1296@gmail.com>

to: Michelle Yarbrough <myarbrough@gwblawfirm.com>

date: Mon, Apr 25, 2016 at 5:15 PM

subject: Re: Notice of ADR 2015cp2305171

mailed-by: gmail.com

: Important according to our magic sauce.

Armando Zulveta <acere1296@gmail.com>

Apr 25 (1 day ago)

to Michelle

Your message was something like "It is going to be adequate. My last question was (is): Settlement would be in accordance with Plaintiff Zulveta's Civil Action No: 2015-CP-23-05171 demands? This would be an act of good faith.Thanks.

EXHIBIT "J"

STATE OF SOUTH CAROLINA )  
COUNTY OF GREENVILLE ) IN THE COURT OF COMMON PLEAS

Armando Despaigne Zolvetz )  
Plaintiff )

vs. )

CHARTER COMMUNICATIONS, INC )  
Defendant. )

JUDICIAL CIRCUIT

**MOTION AND AFFIDAVIT TO  
PROCEED IN FORMA PAUPERIS**

FILE NO. 2015CP-23-05171

Armando Despaigne Zolvetz

I, Armando Despaigne Zolvetz, being duly sworn, state that I am the Plaintiff and that I do not have the funds available to pay the costs of filing and service in the present matter. I hereby request that the complaint be filed and service made without costs.

Sworn to and Subscribed before me  
this 24 day of Jan, 2016

Roli Casper Dell  
Notary Public for South Carolina

My Commission expires  
12/09/2024

Armando Despaigne Zolvetz  
Signature of Plaintiff or  
Person Filing Complaint on Behalf of  
Plaintiff

**ORDER**

- Leave is granted to proceed in forma pauperis without payment of the filing fee.
- Leave is granted to proceed in forma pauperis without payment of the service cost.
- Leave is denied to proceed in forma pauperis.

Dated: 2 FEB, 2016

Greenville, South Carolina

JUDGE/CLERK OF COURT

2158

NOTICE TO PLAINTIFF: The Court may assess costs against either party at hearing.

EXHIBIT "K"

RBS

FILED-CLERK OF COURT  
GREENVILLE CO. S.C.  
STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS  
PAUL B. WICKENSHAMER  
COUNTY OF GREENVILLE THIRTEENTH JUDICIAL CIRCUIT  
2016 FEB 23 PM 4 46

Armando Despaigne Zulveta )

vs.

) File No.: 2015-CP-23-05171

Charter Communications, Inc. )  
-----

*[Handwritten signatures and scribbles]*  
FILED-CLERK OF COURT  
GREENVILLE CO. S.C.  
PAUL B. WICKENSHAMER  
2016 FEB 18 PM 1 26

**MOTION FOR RECONSIDERATION**

To avoid repetition Plaintiff-Appellant Zulveta refers this Honorable Court to Docket Sheet pertaining to File No.: 2015-CP-23-05171.

On 01/28/2016 Honorable Judge Code 2138 entered and also on 02/04/2016 filed in court same judgment that grants Plaintiff Zulveta an amend to reflect the proper name of Defendant as CHARTER COMMUNICATIONS, LLC.

On 02/02/ 2016 Honorable Judge Code 2158 entered an Order and also filed same Order on 02/09/2016 which denied Plaintiff Zulveta's Motion to Leave to Proceed in Forma Pauperis to: ARMANDO DESPAIGNE ZULVETA V. CHARTER COMMUNICATIONS, INC.

Order of Denial Motion to Proceed in Forma Pauperis filed on 02/09/2016 is a disparate. It prejudices Plaintiff Zulveta's Due Process since Order to Amend Charter Communications, LLC was already issued on 01/28/2016 and filed on 02/04/2016 without Plaintiff Zulveta's acknowledgement. Honorable Judges Code 2138 and 2158 should have coordination issuing, notifying Plaintiff-Appellant Zulveta of their Orders.

In addition, Order filed on 02/09/2016 has no foundation since Honorable Judge Code 2158 provided no reason for its denial.

Therefore, Plaintiff-Appellant Zulveta moves this Honorable Court into reconsider its order and grant Plaintiff-Appellant Zulveta Motion to Proceed in Formna Pauperis: ARMANDO DESPAIGNE ZULVETA V. CHARTER COMMUNICATIONS, LLC

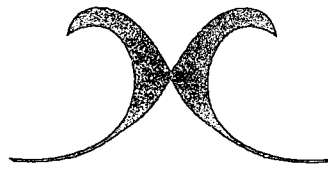
In addition, Plaintiff Zulveta doesn't understand of why the Orders from South Carolina

Court of Appeals are coming super fast even ahead of Greenville County Court's Orders.  
Transparency is missed, good faith is not there.

On this day the 18 of february, 2016

Respectfully Submitted;

Armando 02/18/2016  
Armando Despaigne Zúñiga



## DAVID B. MARVEL

Attorney at Law • Proctor in Admiralty  
Certified Civil and Federal Court Mediator  
Admitted to Practice in South Carolina and Georgia

[www.marvel.lawyer](http://www.marvel.lawyer)

May 5, 2016

Michelle Deluca Yarbrough  
P.O. Box 10589  
Greenville, SC 29603-0589

Armando Despaigne Zulveta  
P.O. Box 24892  
Winston Salem, NC 27114

Re: Armando Despaigne Zulveta vs. Charter Communications Inc  
Case No. 2015-CP-23-05171

Dear Ms. Yarbrough and Mr. Zulveta,

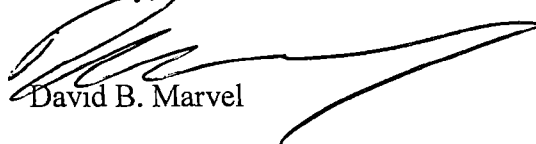
I hope this letter finds you all well. I have received notice from the Greenville County Court of Common Pleas that I have been appointed to serve as an alternate mediator in this case.

While you are always free to select another mediator, I would be pleased to serve in this matter. Pursuant to Rule 9(b), SCADR, appointed mediators may charge no more than \$175 per hour, which is split between the parties. Noting that the Plaintiff appears to be *pro se*, I would be willing to discuss a lower fee or a flat fee if circumstances make that appropriate.

I have enclosed my C.V. for your review. Over fifteen years of practice, I have appeared in nearly every forum where one can file a claim in South Carolina, representing a wide variety of clients. I am hopeful that I can assist with the resolution of your case.

Please call me at your convenience to discuss the scheduling of mediation. My office is in Charleston, but I would be happy to schedule a convenient location in Greenville County. I look forward to hearing from you soon. With best regards, I remain

Sincerely,



David B. Marvel

/DBM  
Enclosure

**Greenville County Common Pleas**  
**Paul B. Wickensimer Greenville County Clerk Of**  
**305 East North Street**  
**Greenville, SC 29601-2120**  
**(864) 467-8551**

Received From: Zulveta, Armando Despaigne  
P.O Box 24892  
Winston Salem, NC 27114

Date: 8/21/2015  
Receipt #: 317535  
Clerk: HORTONL

Paying for: Self  
Transaction Type: Payment  
Payment Type: Credit Card \$150.00  
Convenience Fee \$2.55  
SC.gov Portal Fee \$1.00  
Total Paid: \$153.55

Reference #:  
Comment:  
Non-Refundable

Case #	Caption	Previous Balance	Amount Paid	Balance Due
2015CP2305171	Armando Despaigne Zulveta vs. Charter Communications Inc	\$150.00	\$150.00	\$0.00
CVFFCN	Civil Filing Fee County 44%/100%	\$43.00	\$43.00	\$0.00
CVFFST	Civil Filing Fee State 56%	\$56.00	\$56.00	\$0.00
GCB	Greenville County Bar	\$1.00	\$1.00	\$0.00
SCJDPV	SCJD Filing Fee Proviso \$50 / \$25	\$50.00	\$50.00	\$0.00
<b>Total Cases: 1</b>		<b>\$150.00</b>	<b>\$150.00</b>	<b>\$0.00</b>

I AUTHORIZE THIS TRANSACTION AND  
AGREE TO PAY THE ABOVE TOTAL AMOUNT  
PLUS PROCESSING FEES ACCORDING TO  
THE CARD ISSUER AGREEMENT

Convenience Fee: \$2.55  
SC.gov Portal Fee: \$1.00  
Total Paid: \$153.55

*X* Armando Despaigne 08/21/2015

**Greenville County Common Pleas**  
**: Paul B. Wickensimer Greenville County Clerk Of**  
**305 East North Street**  
**Greenville, SC 29601-2120**  
**(864) 467-8551**

Received From: Zulveta, Armando Despaigne  
P.O Box 24892  
Winston Salem, NC 27114

Date: 10/20/2015  
Receipt #: 320039  
Clerk: JUDYS

Paying for: Self  
Transaction Type: Payment

Reference #:  
Comment:  
Non-Refundable

Payment Type: Credit Card \$25.00  
Convenience Fee \$0.43  
SC.gov Portal Fee \$1.00  
Total Paid: \$26.43

Case #	Caption	Previous Balance	Amount Paid	Balance Due
2015CP2305171	Armando Despaigne Zulveta vs. Charter Communications Inc	<b>\$25.00</b>	<b>\$25.00</b>	<b>\$0.00</b>
MOTION	Motion/Order Filing Fee \$25	\$25.00	\$25.00	\$0.00

I AUTHORIZE THIS TRANSACTION AND  
AGREE TO PAY THE ABOVE TOTAL AMOUNT  
PLUS PROCESSING FEES ACCORDING TO  
THE CARD ISSUER AGREEMENT

*A. Despaigne* 20/10/2015

Total Cases: 1

	<b>\$25.00</b>	<b>\$25.00</b>	<b>\$0.00</b>
Convenience Fee:		<b>\$0.43</b>	
SC.gov Portal Fee:		<b>\$1.00</b>	
Total Paid:		<b>\$26.43</b>	

**Greenville County Common Pleas**  
**: Paul B. Wickensimer Greenville County Clerk Of**  
**305 East North Street**  
**Greenville, SC 29601-2120**  
**(864) 467-8551**

Received From:	Zulveta, Armando Despaigne P.O Box 24892 Winston Salem, NC 27114		Date: 11/20/2015
Paying for:	Self		Receipt #: 321538
Transaction Type:	Payment		Clerk: JUDYS
Payment Type:	Cash	\$25.00	Reference #:
Total Paid:		\$25.00	Comment: Non-Refundable

<u>Case #</u>	<u>Caption</u>	<u>Previous Balance</u>	<u>Amount Paid</u>	<u>Balance Due</u>
2015CP2305171	Armando Despaigne Zulveta vs. Charter Communications Inc	\$25.00	\$25.00	\$0.00
MOTION	Motion/Order Filing Fee \$25	\$25.00	\$25.00	\$0.00
<b>Total Cases: 1</b>		<b>\$25.00</b>	<b>\$25.00</b>	<b>\$0.00</b>

**Greenville County Common Pleas**  
**: Paul B. Wickensimer Greenville County Clerk Of**  
**305 East North Street**  
**Greenville, SC 29601-2120**  
**(864) 467-8551**

Received From:	Zulveta, Armando Despaigne P.O Box 24892 Winston Salem, NC 27114	Date: 1/15/2016
Paying for:	Self	Receipt #: 323423
Transaction Type:	Payment	Clerk: JUDYS
Payment Type:	Credit Card	Reference #:
	Convenience Fee	Comment:
	SC.gov Portal Fee	Non-Refundable
<b>Total Paid:</b>	<b>\$26.43</b>	

Case #	Caption	Previous Balance	Amount Paid	Balance Due
2015CP2305171	Armando Despaigne Zulveta vs. Charter Communications Inc	\$50.00	\$25.00	\$25.00
MOTION	Motion/Order Filing Fee \$25	\$25.00	\$25.00	\$0.00

I AUTHORIZE THIS TRANSACTION AND  
 AGREE TO PAY THE ABOVE TOTAL AMOUNT  
 PLUS PROCESSING FEES ACCORDING TO  
 THE CARD ISSUER AGREEMENT

*[Handwritten Signature]* 01/15/2016

Total Cases: 1	\$50.00	\$25.00	\$25.00
	Convenience Fee:	\$0.43	
	SC.gov Portal Fee:	\$1.00	
	Total Paid:	\$26.43	

**Greenville County Common Pleas**  
**: Paul B. Wickensimer Greenville County Clerk Of**  
**305 East North Street**  
**Greenville, SC 29601-2120**  
**(864) 467-8551**

ad From: Zulveta, Armando Despaigne  
P.O Box 24892  
Winston Salem, NC 27114

Date: 2/18/2016  
Receipt #: 325170  
Clerk: mbrooks

for: Self  
Action Type: Payment  
Payment Type: Cash  
Paid: \$25.00

Reference #:  
Comment:  
Non-Refundable


<u>Case #</u>	<u>Caption</u>	<u>Previous Balance</u>	<u>Amount Paid</u>	<u>Balance Due</u>
CP2305171	Armando Despaigne Zulveta vs. Charter Communications Inc	<b>\$50.00</b>	<b>\$25.00</b>	<b>\$25.00</b>
MOTION	Motion/Order Filing Fee \$25	\$25.00	\$12.50	\$12.50
MOTION	Motion/Order Filing Fee \$25	\$25.00	\$12.50	\$12.50
<b>Total Cases: 1</b>		<b>\$50.00</b>	<b>\$25.00</b>	<b>\$25.00</b>

Alfonso Interpreting & Transporting, Inc  
25 de enero de 2016  
Zulveta v. Charter  
Condado de Greenville  
Juzgado de primera instancia

## RECIBO

Acuso recibo del señor Armando  
Zulveta la suma de \$130.00  
por servicios profesionales de  
interpretación el día lunes,  
25 de enero de 2016 en efectivo.

Alfonso Interpreting

  
Emily O. Alfonso

STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS

COUNTY OF GREENVILLE THIRTEENTH JUDICIAL CIRCUIT

Armando Despaigne Zulveta, Plaintiff v. Charter Communications, LLC., Defendant Civil  
Action No.: 2015-CP-23-05171

SERVICE OF PROCESS

This is to certify that a true copy of Plaintiff-Appellant's Petitioner's Petition to IFP with  
its two Affidavits, Supplementary Evidences.

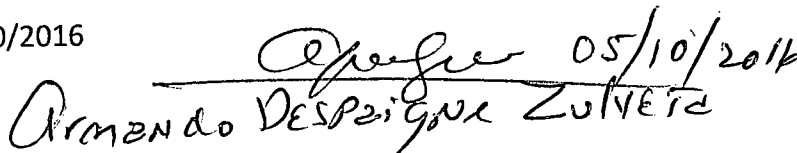
EXHIBIT "A" contains Email for production of Transcript, INVOICE, Transcript pages 8,  
and 19 enclosed.

EXHIBIT "B" contains: Letter to attorney Hill and library letter dated 10/22/2015. Also  
complaint and certified Mail receipt date 11/12/15, 2 personal business card, library  
letter date 11/30/2015, 12/16/2015. 10/22/15.

EXHIBIT "C" contains: Notice with its Memorandum of Law and Affidavit, Notice of ADR,  
Exhibit from "A" to "K" related to legal bills in court, Mediator letter

has been electronic served upon: GALLIVAN WHITE and BOYD, Michelle D. Yarbough,  
attorney for defendant Charter Communications, LLC at: (864) 271-7502

On this day 05/10/2016

 Armando DESPAIGNE ZULVETA 05/10/2016

P.O. BOX 24892 Winston-Salem, NC 27114

Email: acere1296@gmail.com Phone: (864) 305-9480

**RECEIVED**

MAY 11 2016

SC Court of Appeals