

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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NOV 30 2016

S.C. SUPREME COURT

APPEAL FROM AIKEN COUNTY

Court of Common Pleas

Doyet A. Early, Ell, Circuit Court Judge

Opinion No. 2016-UP-397

(S.C. Ct. of Appeals filed August 3, 2016)

Appellate Case No. 2016-002162

Carlton E. Cantrell,

.....Petitioner,

v.

Aiken County, Aiken County Animal
Control, Shirley Hardin, Aiken
County Animal Control Officer Bobby
Arthurs, and Judge Charles T,
Carter,

.....Respondents

Reply to Return to
PETITION FOR WRIT OF CERTIORARI

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The defendants asserts in their defense that they are shielded from liability from their actions on the Basis of South Carolina Code 15-78-60(5) and 15-78-70(b), which bar liability on the part of judicial Authority where the act constitutes an exercise of judicial discretion or judgement, where such an act does not involve fraud, actual malice, intent to harm, or a crime involving moral turpitude. However madgristrate Carter, in issuing a warrant, must review the warrant carefully for patent falsehoods or inherent controdictions this he failed to do. This did not constitute an exercise of discretion, or nonfeasance, is not shielded activity. Reference to the trial court that Madgestrate Carter's activity because it constituted the exercise of discretion, this finding of the trial court is without basis, Judge Carter issued the warrents without exercising his discretion or duty to review the allegations underlying the warrant applications.

1. Bobby Arthurs made false statements in his affidative to Judg T. Carter.
2. Judge Charles T. Carter signed two warrents without a veterinarian being involved which is Required by law he should have known this being a Judge.
3. Mr. Cantrell already had a veterinarian Lisa Handy she was not notified at all, Lisa Handy said That this should have never happened because their must all ways be an veterinarian involved and their Wasn't, secondly they must always issue a warning and give time to correct any problems and they Didn't and besides all this there is no sutch thing has unsanitary conditions for goats, cows and pigs.
4. Lisa handy came to the sheltrt where they were keeping Mr. Cantrells animals without notifying The animal shelter, their was no water for them to drink it was over 100 degrease farenhite goats were Dead and dying. She called the county administrator and demanded that they bring the animals back to Mr. Cantrell the owner but he refused, lisa handy told Mr. Cantrell you need to sue them for what they Are doing to your animals.

- The defendants state that Mr. Cantrell willingly signed a plea agreement.
5. The petitioner Mr. Cantrell, his lawyer at the time was Everett Chandler who went into hiding A week before the trial and had his secretary tell lies about his whereabouts and was cutting A deal with Aiken County to keep Mr. Cantrell from suing them.
 6. The plea agreement was forced onto Mr. Cantrell against his wishes, and Mr. Cantrell said that He could not trust his lawyer anymore for a fair trial so his veterinarian Lisa Handy told him to To sign the agreement because her experience with these agreements are that they won't hold Up in court and Mr. Cantrell agreed only if his veterinarian would be put in charge of the plea, Agreement, the County didn't want her being involved but they didn't have any other alternative.
 7. Aiken County didn't keep their part of the plea agreement over 60 adult goats were not returned Expscially the approximately 40 babies thart were born at the animal sheltrt while they were in The countys possession and several were dead on one of the trailer loads brought back over 45 Died within a month after their return because they hadent been taken care of by the county they Wère Infested with worms and had been exposed to mainge which my goats never had this was Intentionally done by the county because they never intended to return Mr. Cantrells goats.
 8. Lisa Handy came over after they had been returned and seen how bad their condition and one Died while she was their and she told me you need to sue the county fore what they did to your Animals and told me to take the dead one to Clemson University for an autopsy and I did.
 9. Mr. Cantrell took Animal Contol back to Aiken Summary Court before Judge tracey Carroll and Shirley harden was laugffing and sticking her tong out at Mr. Cantrell in the court room.
 - 10.. After the hearing, Judge Carrolls secretary Becky called Mr. Cantrell and told him that Judge Carroll Had requested an investigation be done in this matter.
 - 11 The investigation was completed in November 2005 by SLED, Judge Carter was removed from His position as Judge. Shirley Harden was charged with perjury and removed has Aiken County Animal Control Director.

The defendants asserts in their defence that the statute of limitations has been breached. The unlawful seizure of Mr. Cantrell's animals occurred on May 19, 2005. Mr. Cantrell was forced into a plea agreement by his lawyer at the time Everett Chandler on August 8, 2005. At the end of August Animal Control failed to return all of Mr. Cantrell's animals. Mr. Cantrell took Animal Control back to Judge Carroll's Court in September of 2005, which brought forth an investigation by SLED in allegations of perjury by the Director of Animal Control Shirley Harden. In November of 2005 Shirley Harden was removed from her job and charged with perjury and also Judge Carter was removed from his job.

Mr. Cantrell took Animal Control back to court in Patrick Sullivan's Court in New Ellington to have the Plea agreement removed to seek civil damages, that were brought on him by Aiken County.

On October 3, 2007 Judge Patrick Sullivan issued a Court Order granting the release-dismissal would be set aside in its entirety. Judge Patrick Sullivan told Mr. Cantrell that he had three years to file a civil suit.

On May 19, 2008 Mr. Cantrell filed a Civil Complaint at the Aiken County Court house against Aiken County, Aiken County Animal Control Director Shirley Harden, Aiken Animal Control Officer Bobby Arthurs and Judge Charles T. Carter, Civil Action 08-CP-02-887.

On December 8, 2008 the Civil Complaint was heard before Judge Early who completely dismissed the Complaint against Judge Charles T. Carter. And gave Mr. Cantrell 10 days in which to fully comply with all written discovery requests and then reinstate the matter.

Mr. Cantrell asked his lawyer at the time Michael Chesser if he would do the Appeal, he said that he would help start the Appeal only and he did, and that he would help me with the outstanding matter and reinstate the matter.

Mr. Cantrell's lawyer Michel Chesser failed to send all the outstanding matter saying that their was too much and they didn't need it all, and he also failed to reinstate it at the Court House.

The Petitioner Mr. Cantrell went to see Elizabeth Carter at the Appeals Court and she said that were not concerned about the other defendants right now only Judge Charles T. Carter who had his own lawyer at the time.

In mid March 2009 Mr. Cantrell received a letter from the Court of Appeals dated March 18, 2009. It stated that you are reminded that pursuant to the case caption on your notice of appeal originally filed with this court, Aiken County, Aiken County Animal Control director Shirley Harden, Aiken County Animal

Control Officer Bobby Arthurs and Judge Charles T. Carter are all respondents in this matter, this told Mr. Cantrell that the matter didn't need reinstating because all the defendants are under the same civil Complaint, and we were in the Court of Appeals.

After the Appeals Court went in fav or of the defendants, Mr. Cantrell asked his lawyer Michael Chesser if he would help with the Writ of Certiorari and he said that he would. After the Supreme Court Mr. Cantrell went back to the Aiken Court House and talked with the Clerk of Court and she said that if You have any new evidence you can refile the suit under a nother number within 30 days, of the courts Decision, so Mr. Cantrell refiled with more evidence that this was a conspiracy against him on July 7, 2011. Civil Complaint 11-CP-02-01480.

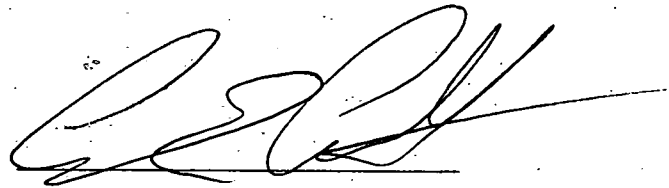
The defendants complain that this is frevilous but Mr. Cantrell is gathering up more evidence everytime He refiles these complaints that Aiken County has a Conspiracy against Mr. Cantrell.

The Defendants asserts that these animals have no monitary value but these animals are Mr. Cantrells Livelihood and considers them to be part of his family and they had no right to destroy his livelyhood and family.

In July of 2005 while Mr. Cantrells animals were being held captive at the animal Shelter by Aiken County, Animal Control Director Shirley Harden, and Animal Control Bobby Authurs came to MR. Cantrells dwelling place and told Mr. that we did this to teach you a lesson! A lesson for what Mr. Cantrell had not done anything wrong, but what they ment was back in January of 2005 Mr. Cantrell Called the F.A.A. in Washington D.C. and talked to a secretary for over an hour while she typed his Conversation. Reference Mr. Cantrells Conclusion on his Final Brief of the Court of Appeals. Mr. Cantrell explained how Aiken County was bringing in Millions or Billions of dollars inn Cocane By Military Aircraft, Private Aircraft, Coast Guard Aircraft, and small planes flown by the Sheriffs Deputies themselves, and what allowed them to get away with this is that they have removed all The old radar systems from all the small airports in this area of South Carolina and replaced them with A receiver device which will only pick up a transmitted signal from a flying aircraft if it is equipted with A transmitter called a beacon. According to Cathy Rawles on the Aiken County council, on of the Sheriffs Deputies was cought with a small plain loaded from one end to the other with cocane and he was only Dismissed and not prosecuted. Now they are landing the planes in the fields around Mr. Cantrells Dwelling place. And unloading into box traylers and moving it to another place. After talking with F.A.A. In Washington the drug traffick completely stopped for several months and then it started back even Faster than before its like they were trying to make up for lost time.

Mr. Cantrell never did hear from the FAA and tried to get back in contact with them but they had The phone system blocked with a bunch of recordings. It was right after this that Shirley Harden and Bobby Arthurs showed up in Mr. Cantrells dwelling place with warrents signed by Judge Terry Carter To confiscate all his animals the Sheriffs department had the roads blocked off, they borrowed horse Traylors from other people all Mr. Cantrell could do was call Chanel 12 news and they were right up the Road at the time and filmed the whole ceisure of Mr. Cantrells animals and also interviewed him on Tape. And it was showed that night and Cathy Rawles seen it on the news that night and came out to Mr. Cantrells dwelling Place that Sunday and started fighting against the county for what they had done.

November 27, 2016



Carlton E. Cantrell

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PROOF OF SERVICE

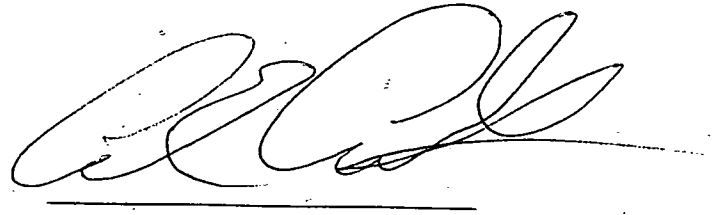
I Carlton E. Cantrell, do hereby certify that the Reply to Return for Writ of Certiorari has been served on the Respondents in the above-caption by placing same in the United States Mail, with correct postage attached there to on this day November 28, 2016.

Davidson and Lindermann, P.A.

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Post Office Box 8568

Columbia, South Carolina 29202

A handwritten signature in black ink, appearing to read 'Carlton E. Cantrell', written over a horizontal line.

Carlton E. Cantrell