

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE COURT OF COMMON PLEAS
Aiken County

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SC Court of Appeals

Doyet A. Early, III, Circuit Court Judge

Appellate Case No. 2016-002275

Carlton E. Cantrell,

.....Appellant

v

Aiken County, Aiken County Animal Control / Code
Enforcement Director Bobby Arthurs, Aiken County
Animal Control / Code Enforcement Officer Ron Cooper,
Judge Donna L. Williamson

.....Respondents

AMENDED FINAL BRIEF OF APPELLANT

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Carlton E. Cantrell, Appellant
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Aiken South Carolina 29805
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Table of Authorities

1. South Carolina Code Sections 15-78-60(5) and 15-78-70(b).

Statement of Issues on Appeal

1. The Appellant Mr. Cantrell was told by the Aiken County Department of Health and Human Resources that rabies shots were only required if a dog bit someone. Mr. Cantrell has never been told otherwise or ever issued a warning for rabies shots by Aiken County.
2. Mr. Cantrell was issued two citations animals at large and failure to vaccinate on dogs that didn't even belong to him, they were strays that his neighbor Marie Fox was feeding. (R. p. 14)
3. Mr. Cantrell's friend Jean B. Smith a legal assistant was kidnaped by Aiken County on July 13, 2015 because she had been working with him on this case.
4. Mr. Cantrell turned in a report to the FBI on Jean Smith missing, and Bobby Arthurs Director of Animal Control who had Junior, and Enn Enlow feeding his dogs razorblades that were inside a fenced in area. (R. p. 7, lines 18-26)
5. The defendants asserts in their defense that they are shielded from liability from their actions on the basis of South Carolina Code Sections 15-78-60(5) and 15-78-70(b), which bar liability on the part of a judicial authority where the act constitutes an exercise of

judicial discretion or judgement, where such act does not involve fraud, actual malice, intent to harm, or crime involving moral turpitude.

6. Officer Cooper just driving down the road and makes statements that are false about dogs in the road, and then writes Mr. Cantrell two Citations for Dogs that don't belong to him is not protected this does not constitute the reasonable exercise of discretion or judgement, where such act does not involve fraud, actual malice.
7. Judge Williamson was out to get Mr. Cantrell from the beginning the way she conducted the trial and the things she said and her actions towards Mr. Cantrell does not constitute the reasonable exercise of discretion or judgement, where such act does not involve fraud, actual malice, intent to harm, or a crime involving moral turpitude.
8. The trial Court's alternative basis for dismissal of the complaint, was its finding that there was no allegation of wrongdoing on the part of Officer Cooper and the Magistrate Williamson. This finding is without basis, and the Court of Appeals should find that there is in fact a jury issue.

Statement Of The Case

It all Began in the summer of 2011, the Appellant Mr. Cantrell had a friend named Junior Enlow watching his house with his grandson Enn Enlow, and Mr. Cantrell left to go to town to get some supplies and when he got back one of his dogs had bitten Junior Enlow on the hand he told Mr. Cantrell that Enn his grandson was picking at the dogs and his hand was on the fence at the time and the dog bit his hand, and he left and went to the emergency room, to get it checked out, Junior was a diabetic.

Mr. Cantrell had another friend Alonzo Willams who help him for a while and he was their the day Aiken County Department of health and Human Resources showed up and requested to see the dog that had bitten Junior, and quarantine the dog for 10 days and told Mr. Cantrell that he had within 10 days to get the dog a rabies vaccination, and Mr. Cantrell asked him about the other dogs needing vaccinations and he said that it wasn't necessary only the dog that hade bitten Junior. Alonzo watched Mr. Cantrell's house while he took the dog to get a rabies shot and he took another dog to keep it company and got both dogs rabies shots Mr. Cantrell had about 25 dogs at this time.

In the Summer of 2012, Junor Enlow was watching Mr. Cantrell's house again with Enn his grandson, he left to go to town to get supplies and after he came back, Junior and his grandson Enn left, just after they left one of his dogs spat up a razor blade, and he found another razor blade where Junior had parked his vehicle, Mr. Cantrell immediately called Junior and asked him if he had been letting Enn feed his dogs razor blades, and he said I won't

bring Enn over thair anymore. Mr. Cantrell Called his veterinarian Lisa Handy and told her what was going on and she said that she would document it.

Jean B. Smith was helping Mr. Cantrell has a friend do his legal papers and was keeping records of things that were transpiring and he told her about the razor blade incident and she also said that she would document it.

Mr. Cantrell got a lady by the name of Jan Voight to watch his house after this he met her when she worked for the Sheriff's Department serving legal papers, which she has done for him several times, she no longer worked for the Sheriff's Department she said that they had set her up to drive a vehicle with drugs in the trunk of the car that she knew nothing about and busted her for drug trafficking, but they couldn't prosecute her because it wasn't her vehicle and their was no evidence to support their allegations, but they fired her from the Sheriff's department and she started her own business animal setting service, she had worked for the Aiken Animal Shelter Before and had connections to clients.

Jan Voight told me that rabies shots were required and Mr. Cantrell told her that isn't what the Aiken County Health and Human Resources Department told me, and she said that they are setting you into a trap, and Mr. Cantrell told here that they would half to issue a warning first and then give him time to get the vaccinations.

There were around 15 stray dogs that Mr. Cantrells neighbor Marie Fox had been feeding and they were staying in her yard at this time and they would run back and forth between his house

and Marie Fox's house, Jan loved animals and made friends with some of them.

Several months went by and Aiken County was trying to destroy Jan Voight's husband's business, he had a dumpster business and a truck to haul the dumpsters with but he was using his yard to store the dumpsters and park the truck also, Aiken County had found an old annex law that went into effect a year before he had started his business and was trying to force him to move or shut down his business. Jan Voight was approached by a Federal Officer which told her that he could order a plane to take her out in just a few minutes, she told Mr. Cantrell about this just before she got scared and left.

After Jan Voight left Mr. Cantrell was forced to get Junior Enlow to watch his house again, and it wasn't long that another dog bit Junior worse than the last time, it needed stitches, Mr. Cantrell told him to go to the emergency room because he was diabetic and that he would get the dog a rabies shot, and he said I am not going to go and you don't need to get the dog a rabies shot. Junior has picked at these dogs for years and dogs don't like this kind of behavior, and they don't forget.

It was during this time that Mr. Cantrell's neighbor Marie Fox had quit feeding the dogs that were staying in her yard and people driving by were throwing food into the road in front of his house and keeping the stray dogs in the road. (R. p. 12, lines 1-4)

About this time an old friend name Ryan Gunter came over this was on July 1, 2015 and said that he would watch Mr. Cantrell's house because he needed some extra money, and that would cut loose Junior. Mr. Cantrell told him that he needed to go to town tomorrow and get some supplies, this would be July 2, 2015 and

that Junior was going to come over in the morning, but Mr. Cantrell would call Junior and tell him that you will be watching my house for a while. Mr. Cantrell tried to call Junior several times but he wouldn't answer the phone.

Ryan Gunter came over at 8am and Mr. Cantrell left fore town and it wasn't long before Ryan called him and told him that someone was in his driveway in a small car. And Junior called Mr. Cantrell right after this, and said he was at his gate, and that Ryan was in his yard and Mr. Cantrell told Junior that he had been trying to call, and told Junior that he could go back home because Ryan was watching his house and Junior said that ill weight hear till you get home, and right after this Ryan Gunter calls Mr. Cantrell back and says that there are three Animal Control Officers setting in the road behind Junior, Mr. Cantrell said that he would be back home in about 20 min. (R. p. 2, line 1-p. 3, lines 1-4)

When Mr. Cantrell arrived Animal Control had his drive way and the road blocked so Mr. Cantrell had to park on the other side of the road on his other property, the Officers were standing around with their cameras but there were no dogs around and Mr. Cantrell walked across the road and Officer Cooper said that they were responding to a complaint from his neighbor about dogs in her yard and Mr. Cantrell told them that those where her dogs that she had been feeding them, then seven of the stray dogs that his neighbor Marie Fox had been feeding came out into the road, and Officer Cooper started writing a citation for dogs at large and asked Mr. Cantrell how many dogs are in the road while the other officer was taking pictures. Then they proceeded to write Mr. Cantrell another citation for failure to vaccinate, Mr. Cantrell asked officer what about his neighbor's complaint he said were

not concerned about that right now were concerned about dogs in the road. (R. p. 3, lines 5-18)

Mr. Cantrell told Officer Cooper that you half to issue a warning before you can issue a citation and one of the other officers said that in your case we don't half to. Mr. Cantrell told the Officer that he already had a civil complaint against Animal Control for violating procedures, and the Officer said that were under a new umbrella now that doesn't matter, they had a symbol of a light house on the door of their trucks that said Code Enforcement.

Mr. Cantrell asked Officer Cooper about dogs crossing the road since the road goes through his property and he said so long has you're with the dogs it's all right. Then Officer Cooper handed Mr. Cantrell the citations and told him that you better not show up in Court without these rabies vaccinations that meant that they were going to lock Mr. Cantrell up and Officer Cooper said that we may come back and wright you up again before the Court date. (R. p. 3, lines 19-25)

After the Officers left Junior Enlow who had been talking with the Officers before Mr. Cantrell arrived said their going to lock you up and take everything that you own away from you. (R. p. 4, lines 1-3)

After Junior Enlow left Ryan Gunter said that there were no dogs in the road the whole time that Animal Control came up and sat their waiting for you to come home until you got out of your vehicle and walked over to them than the dogs ran down where you were.

On July 13, 2015, Mr. Cantrell got a call from Ryan Gunter and he said that Jean Smith had been reported missing from her home.

Mr. Cantrell knew that Aiken County had done something with Jean Smith because they were working together, and they didn't want her to help him so Mr. Cantrell went to the FBI Office in Columbia and talked with an Officer and gave him some papers describing his relationship with Jean B. Smith and what he knew about her and that he was certain Aiken County had done something with her, and also turned in a report on Bobby Arthurs and Junior and Enn Enlow, feeding his dogs razor blades, and bringing up false charges against Mr. Cantrell. That night on the news Sheriff Hunt said that they were going to discontinue their search for Jean Smith.

On the day of the Court hearing their attitude had changed and Mr. Cantrell requested a Jury Trial and picked Jurors, Mr. Cantrell used up all his strikes on the 6 primary Jurors and officer Cooper picked the 6 secondary. Mr. Cantrell requested and filled out two subpoenas one for Junior Enlow and the other for his Neighbor Marie Fox, for the trial which was scheduled on August 26 2015. (R. p. 4, lines 4-8)

On the way out to his vehicle Officer Ashe asked Mr. Cantrell how many dogs did he own and told him that he had better get at least half of them vaccinated within 5 days or he would write him another citation, which he never did show up. (R. p. 4, lines 9-13)

On the day of the trial August 26, 2015 Mr. Cantrell had a friend by the name of Don Tran, who watched his house and Ryan Gunter took him to Wagner South Carolina where the trial was scheduled, for 9:30 am, he was going to do the trial pro sa. (R. p. 4, lines 14-17)

Just before the trial began Mr. Cantrell heard Officer Cooper tell Officer Ashe that Judge Williamson had another Trial scheduled at 10:30 am. (R. p.4 lines 18-20)

Then Judge Williamson came in and said that we should be able to do this whole trial from start to finish within 35 minutes.

Judge Williamson had already dismissed 5 of the primary jurors that Mr. Cantrell had picked, and replaced them with the jurors that Officer Cooper had picked. (R. p. 4, lines 21-25)

Officer Cooper took the stand and said that they three of them were just driving down Muddy Branch Road and seen dogs in the road and they stopped and waited for the owner and issued two citations for dogs at large and failure to vaccinate. (R. p. 5, lines 1-4)

Mr. Cantrell told the Jurors that the resin Officer Cooper said they had stopped was because of a complaint from his neighbor Marie Fox whom he had subpoena to come to court and she wasn't even there, and Officer Cooper said that this has nothing to do with this and Judge Williamson said the same. (R. p. 5, lines 4-7)

Officer Cooper showed the Jurors pictures of the dogs in the road and every picture had Mr. Cantrell in the picture and that Officer Cooper said that the dogs could be in the road so long as he was with them, (if there were dogs in the road all the time than why weren't there any pictures of the dogs in the road taken before he arrived home from town.) (R. p. 5, lines 8-14)

Junior Enlow took the stand and he had changed his story from what he had told Mr. Cantrell and said that there were dogs in the road the whole time. (R. p. 5, lines 15-17)

Mr. Cantrell complained to Judge Willamson about his neighbor Marie Fox which he had subpoena was no their, so he told Judge Willamson that Marie Fox was not here and that this trial must be rescheduled, and Judge Willamson said all right with an angry voice and left the Court Room and for a while and came back and said that she was on her way and would be here in about 45 min. (R. p. 5, lines 18-23)

Junior Enlow requested to leave because he said that he was headed to Montana, Mr. Cantrell told Judge Willamson that he might want to ask him some more questions later, on the stand but Judge Willamson let him and his wife go. (R. p. 5, lines 24-27)

Judge Willamson said that let's continue on with this trial while we are waiting for Marie Fox, (since Junior Enlow had lied about the dogs being in the road the whole time) Mr. Cantrell said that he had another witness, Ryan Gunter and that he was in his truck in the parking lot, Judge Willamson sent Office Cooper to get him.

Ryan Gunter took the stand and said that the dogs were with him the whole time since the Officers pulled up and didn't go down to the road until Mr. Cantrell got out of his vehicle and was talking with the Animal Control Officer. (R. p. 6, 6-10)

Marie Fox came in and took the stand and said that she had been feeding between 10 to 15 dogs, and that they had been staying in her yard. And Officer Cooper said that this had nothing to do with this, and Judge Willamson agreed and Mr. Cantrell said that this has everything to do with this because these dogs were the ones that she had been feeding, and they were staying on her property, and Mr. Cantrell said that Officer Cooper said that she had called in a complaint on him, and Marie Fox said that she had never called in a complaint. (R. p. 6, lines 11-19)

The Jurors that Officer Cooper Picked found Mr. Cantrell guilty and Judge Willamson fined him a total 957.98 in fines, and she said if you don't pay it today I will lock you up for 30 days, and had already called in an arresting officer because they knew that Mr. Cantrell didn't have that kind of money in his bank account but his Bank First Citizens honored that request. (R. p. 6, 20-25)

After Mr. Cantrell got home he called the Wagner Courthouse and requested a copy of the transcript and Judge Willamsons clerk said that we don't do transcripts anymore and they hung up the phone on him. (R. p. 11, lines 5-8)

After this Mr. Cantrell decided to file a Civil Complaint, against Aiken County, Animal Control Director Bobby Arthurs, Officer Cooper, and Judge Donna Willamson.

FACTS

1. Junior Enlow and his grandson Enn Enlow had been picking at the dogs and Junior got bitt and went to the emergency room and they contacted the Aiken County department of Health and Human Resources which said that rabies vaccinations were only required if the dog had bitten someone, and quarantined the dog for 10 days and Mr. Cantrell got a rabies vaccination for that dog and another one.
2. Junior Enlow and his grandson Enn Enlow had been feeding Mr. Cantrell's dogs razor blades for quite some time because they were spitting up blood and squirting blood out the ass and several died, he found the evidence when they left one day and one of the dogs spat up a razor blade in front of him right after they left, and they had dropped one where they were parked. Mr. Cantrell called Junior right away and told him so and Junior said I won't bring Enn over thair anymore. (R. p. 7, lines 18-24)
3. Mr. Cantrell called his veterinarian Lisa Handy about Junior and Enn Enlow feeding his dogs razor blades and he told her that they were related to the Director of Animal Control Bobby Authors and that he had them doing this terrible thing to make his dogs sick and she said that she would document it, and he also called Jean B. Smith and told her she was keep his legal records for him at the time.

4. Jan Voight started watching Mr. Cantrell's house, and she told him that rabies shots were required, and he told her that the Aiken County Department of health and Human Resources told him that they were only required if a dog bites someone, and she said their setting you up in a trap, and he told her that they half to issue a warning and give him time to vaccinate the dogs.
5. After this Jan Voight had been threatened by a federal Officer stating that he could have her taken out by a military aircraft right now, she told me and got scared and then she quit watching Mr. Cantrell's house.
6. Junior came back without Enn and it wasn't long before he had gotten bit by a dog again it needed stitches and he refused to go to the doctor and Mr. Cantrell said that he would get a rabies shot for that dog and Junior said forget the rabies shot. Junior didn't want the Department of Health to tell me to get all the dogs rabies shots because, Bobby Arthurs had planned with Junior to set Mr. Cantrell in a trap.
7. Mr. Cantrell's neighbor Marie Fox had been feeding 10-15 dogs in her yard for several months, and she stopped feeding the dogs and people were throwing food in the road in front of his house as to keep the dogs into the road in front of his house. This was also orchestrated by Aiken County, with his neighbor Marie Fox to set him in a trap by using these stray dogs. (R. p. 6, lines 11-13)

8. Mr. Cantrell was going to town on July 2, 2015 to get supplies and a friend named Ryan Gunter said that he needed some extra money and that he would watch his house, and Mr. Cantrell tried to call Junior to tell him not to come but he wouldn't answer his phone. (R. p. 2, lines 1-11)
9. Junior deliberately didn't answer his phone because he had planned this with Animal Control, and they were going to do this no matter what, so he deliberately came over and blocked the gate where Mr. Cantrell couldn't come into his drive.
10. Three Animal Control Officers with three Trucks showed up right after Junior, and parked right behind Junior, blocking the roadway, which forced Mr. Cantrell to park on the other side of the road.
11. Animal Controls plan was to get dogs in the road by stopping in front of Mr. Cantrell's house in the road and walking around with cameras, and Ryan Gunter said the dogs never went down where they were, and Junior Enlow lied and said that the dogs were in the road the whole time.
12. After Mr. Cantrell got out of his vehicle and walked over to Officer Cooper, and talked with him for a few minutes seven stray dogs came down to the road where he was and then they were taking pictures of the dogs, and Officer Cooper started writing citations. And Officer Cooper even said that the dogs could be in the road so long as you're with them, and every picture that they took of the

dogs Mr. Cantrell was in the picture with them. (R. p. 3, lines 1-18)

13. After the Officers left Junior Enlow said exactly what their plan was to lock you up and take everything you owned away from you. (R. p. 4, lines 1-3)
14. The dogs that Officer Cooper wrote the Citations for in the road were the strays that Mare Fox had been feeding and were staying in her yard.
15. Officer Cooper said don't show up for Court without these rabies shots, that meant they were going to lock me up without a trial. (R. p. 3, lines 22-25)
16. Mr. Cantrell tried to contact Jean B. Smith, but she wouldn't answer her phone. Ryan Gunter told him several days later that he heard that she was missing, from her home on July 13, 2015. Mr. Cantrell is sure that Aiken County has moved her somewhere and claimed her missing in order to keep her from helping him.
17. Mr. Cantrell turned in a report to the FBI just before his Court hearing in Monetta SC, of July 23, 2015 on Jean B. Smith missing, and Bobby Arthurs , Director of Animal Control who had Junior Enlow and Enn Enlow feeding his dogs razor Blades, that they were doing this so that they could make the dogs sick so that they could file other citations against him.

18. The next day Sheriff Hunt was on the news stating that they were discontinuing their search for Jean Smith, they were no longer trying to lock Mr. Cantrell up, so he requested a jury trial and picked jurors.
19. On the day of the Jury Trial Mr. Cantrell had a friend named Don Tran, watch his house and Ryan Gunter drove him to the Courthouse in Wagner.
20. Judge Willamson had two Trials scheduled that day Mr. Cantrells was at 9:30 am the other one was at 10:30am this means Judge Willamson expected to do this rilly fast according to what Officer Cooper told Officer Ashe in the Court Room, and when Judge Willamson came into the Court Room she said we should be able to do this whole Trial from start to finish within 35 min. (R. p. 4, lines 18-23)
21. Judge Willamson immediately dismissed 5, of the primary jurors that Mr. Cantrell had picked with his strikes and replaced them with the ones that Officer Cooper had picked. (R. p. 4, lines 25-27)
22. Officer Cooper stated that they just happened to be riding down Muddy Branch Rd. and seen dogs in the road and stopped and waited for the owner. Why would three Animal Control trucks just be riding down Muddy Branch Rd. The only evidence that Officer Cooper had was pictures that they had taken after Mr. Cantrell had arrived back home then the dogs came down to meet him, while he was talking with them, and he was in the pictures. Ryan Gunter was

watching Mr. Cantrells house at the time and said there never were any dogs in the road while he was gone to town. (R. p. 5, lines 1-13)

23. Everything that Mr. Cantrell said and questions that he asked during the trial, Officer Cooper and Judge willamson would say that this has nothing to do with this.
24. The trial was started without Marie Fox being thair and Mr. Cantrell had subpoena her and she was never contacted until he complained about it, and then Judge Willamson called her at home and told her to come. (R. p. 5, lines 17-22)
25. Marie Fox said that she had been feeding 10-15 dogs and that they were staying in her yard, why wasn't she issued these citations for dogs at large and failure to vaccinate. (R. p. 6, lines 13-14)
26. Junior Enlow was in a hurry to get out of their so he asked permission to leave and judge Willamson let him go, Mr. Cantrell said that he had more questions that he wanted to ask him but he didn't want to answer them. (R. p. 5, lines 23-25)
27. Judge Willamson called in an arresting Officer to arrest Mr. Cantrell before he even paid his fine because they knew that he didn't have the money in his account and Judge Willamson told him that she was going to lock him up for 30 days If he didn't pay this fine that day. (R. p. 11, lines 1-4)

28. When Mr. Cantrell got home, he called Judge Willamsons Office and requested a copy of the transcript, and Judge Willamson told the secretary to tell Mr. Cantrell that we don't do transcripts anymore, and then she hung up the phone on Mr. Cantrell. (R. p. 11, lines 6-9)

Arguments

Aiken County was using the Aiken Health and Human Resources Department to mislead Mr. Cantrell about these rabies shots.

Aiken County changed the name of Animal Control to Code Enforcement to get around a Civil Complaint where they violated procedures and took Mr. Cantrell's animals in 2005 and brought damages onto him.

Bobby Arthurs Director of Animal Control had Junior and his grandson Enn Enlow feed Mr. Cantrell's dogs razor blades to make the dogs deathly sick to bring more false citations against him.

Aiken County had Mr. Cantrell's Neighbor Marie Fox too feed stray dogs in her yard for several months and quit feeding them and then had people throw out food in the road in front of his dwelling place to keep the dogs in the road in front of his house.

These stray dogs were being used as a stepping stone to write Mr. Cantrell a citation for the rabies shots without giving him a warning which is required by law.

This was an attempt by Aiken County using this Magistrate Donna Williams to lock Mr. Cantrell up and take everything away from him.

Aiken County removed Jean B. Smith from her premises to make sure there wasn't any one who could help bail him out.

The reason that Aiken County is determined to get rid of Mr. Cantrell is because Aiken County is bringing in millions in Cocaine every day around his dwelling place with the local law enforcement protecting and also distributing it, all his neighbors are involved and are being used to attack Mr. Cantrell, who is not a team player.

Conclusion

It all started in 2011 when Junior was bitten by one of the Appellant Mr. Cantrell's dogs, because Juniors grandson Enn was picking at the dogs and Junior had his hand inside of the fence, while Mr. Cantrell was gone to town to get supplies, and Junior went to the emergency room because he was diabetic. The Aiken Department of Health and Human Resources quarantined the dog for 10 days and told him that he had to get that dog a rabies shot and Mr. Cantrell asked about the others and he said only if a dog is known to bite someone does it need a shot, Alonzo Williams was their has a witness.

The reason Junior was bringing Enn over at the time was because, DSS had given him custody of Enn and his brother JoJo, because of their other brother's death by being shot by their half-brother, Junior says that they were fighting over a woman but Bobby says it was an accident Junior was very angry with Bobby at this time, these boys were Bobbys sisters children she was married to Juniors son but already had a boy by someone else, Junior says that his son the farther of these boys got killed in a work related accident.

Both boys were given custody to Bobby Arthurs mother after this for a while until Enn got caught stealing their neighbor's guns and then DSS gave custody back to Junior and he started bringing Enn Back over again while he was watching Mr. Cantrells house. Enn was getting in fights at school and got expelled from school several times this happened, Mr. Cantrell believes Bobby Authors had him do this so that Junior would bring him over, and that's when they started feeding his dogs razor blades.

This was an attempt by Bobby Arthurs to make Mr. Cantrells dogs sick, and had the Department of Health and Human Resources to mislead him so that they could set him in a trap with the intentions of coming onto his property and fine him and lock him up and take everything away from him, the reasoning behind all this was because Mr. Cantrell already had a pending Civil Complaint in the Appeals Court because Aiken County in 2005 violated procedures and brought up false charges against him, and the only way they could get around this was to changed their name to Code Enforcement to get around his Civil Complaint and were using Junior and his grandson Enn to set him in a trap but Mr. Cantrell caught onto what they were doing when I confronted Junior about the razor blades and Junior quit bringing Enn over and shortly after that Bobbys Mother passed away and that set them back for a while.

And Jan Voight started watching Mr. Cantrells house. he met Jan when she worked for the Sheriff's department, she served legal papers and she served his papers, and shortly after this she was set up to drive a car with drugs in the trunk which she knew nothing about she told him, and they tried to lock her up but it wasn't her vehicle so the charges didn't stick, but they fired her from the Sheriff's department, and she worked at the animal shelter for a while.

Then Jan started her own animal setting business, and Mr. Cantrell needed some papers served so they talked and she said that she could watch his house for a while, Jan told him that rabies shots were required, and Mr. Cantrell told her what the Department of Health and Human Resources in Aiken said that only if a dog bites someone do they need a rabies shot and Jan said that they had set

you into a trap, and he said that they had to give a warning and time to get the rabies shots that's the law.

Jan was getting so many calls from other clients all of the sudden and Mr. Cantrell told her they were trying to keep you busy so that, you can't fit me into your schedule she said that wasn't going to happen. he told her that they would try and scare her off and one day there was a lot of gun shooting behind his house and he told her that they were trying to scare her off, then it wasn't long that a Fed man showed her his badge in Aiken one day and told her that he could have her taken out by an aircraft in just minutes, and left and then she got scared.

This is when she left but Mr. Cantrell warned her from the beginning, that they would eventually scare her off and make her leave because they have done the same thing before to other people that he had watching his house.

Aiken County had Mr. Cantrell's neighbor Marie Fox feeding stray dogs that have been around a long time and they were staying in her yard. These dogs were being used as a jumping board to attack him. (R. p. 10, lines 18-20)

After Jan Voight left Junior Enlow came back to watching Mr. Cantrell's house and right away he got bit by another dog these dogs hated Junior because of the way he treated them, and Junior was getting stumble and I was afraid if he ever fell down in front of the dogs they would jump on him. He refused to go to the doctor, that told me that they were planning something, then Mr. Cantrell's neighbor all the sudden quits feeding the dogs and people are throwing food in the road to keep them in the road in front of his house.

Ryan Gunter called Mr. Cantrell and said that he needed some money and that he would watch his house, so Mr. Cantrell tried to call Junior to tell him not to come over the next day July 2, 2015 because Ryan was going to watch his house for a while, but Junior wouldn't answer his phone because Junior had been working with Bobby Arthurs to set him into a trap with these stray dogs, so that they could write him citations and lock him up and take everything away from him, but Ryan Gunter was there that day has a witness to what took place and how they lied about dogs in the road and they violated procedures again by not giving him a warning for the rabies shots and giving him time to get the vaccinations.

They had Mr. Cantrell scheduled for a hearing before Judge Willamson in Monetta Court where they had planned to lock him up but Aiken County went too far when they kidnapped Jean Smith from her home where she couldn't help him in any way so he turned in a report to the FBI and then they were forced to give him a Jury trial which they didn't want. (R. p. 12, lines 7-10)

They were going to make sure that Mr. Cantrell lost the trial and were planning on locking him up for 30 days, by letting 5 of the primary Jurors go and replacing them with the alternate that Officer Cooper had picked, Judge Willamson said we should be able to do this hole trial in about 35 min, every question that Mr. Cantrell asked or statement he made Officer Cooper would say that this has nothing to do with this and so would Judge Willamson. (R. p. 12, 10-15)

Mr. Cantrell had subpoena his neighbor Marie Fox on the day they picked jurors and she had never been contacted, he complained to Judge Willamson until she finally called Marie Fox from the Court and said that she would be hear in about 45mi. Junior Enlow was

let go before Mr. Cantrell was finished asking questions, and Ryan Gunter testified that there were no dogs in the road and they went down to see Mr. Cantrell after he pulled up. (R. p. 6, lines 6-10)

It was planned from the beginning that Mr. Cantrell would be found guilty, and the Judge Williamson said that you better pay this fine today or I am going to lock you up for 30 days, and had an arresting Officer standing their waiting.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE COURT OF COMMON PLEAS
Aiken County

Doyet A. Early, III, Circuit Court Judge

Appellate Case No. 2016-002275

Carlton E. Cantrell,

.....Appellant

v

Aiken County, Aiken County Animal Control / Code
Enforcement Director Bobby Arthurs, Aiken County
Animal Control / Code Enforcement Officer Ron Cooper,
Judge Donna L. Williamson

.....Respondents

CERTIFICATE OF CONTENTS RULE 211(b)

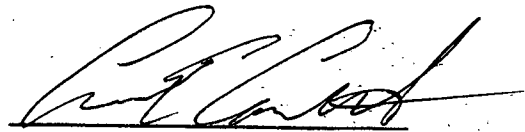
The undersigned Plaintiff/Appellant hereby certifies that the Final Brief(s)
is identical to the previous Brief(s) served under Rule 208.

June 12, 2017

RECEIVED

JUN 12-2017

SC Court of Appeals



Carlton E Cantrell/Appellate

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