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No. S.C. 2017-001198

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JUL 18 2017

IN THE
SUPREME COURT OF THE UNITED STATES

SC Court of Appeals

City of Louisville v. Fox — PETITIONER
(Your Name)

VS.

Bernold Charles Mace Horn — RESPONDENT(S)

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

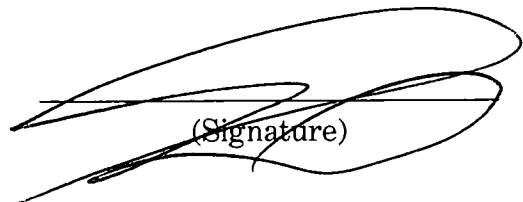
The petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s):

U.S. Supreme Court

Petitioner has **not** previously been granted leave to proceed *in forma pauperis* in any other court.

Petitioner's affidavit or declaration in support of this motion is attached hereto.


(Signature)

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SC Court of Appeals

AFFIDAVIT OR DECLARATION
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

I, Glynnis Valdez, am the petitioner in the above-entitled case. In support of my motion to proceed in forma pauperis, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

- 1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Table with 5 columns: Income source, Average monthly amount during the past 12 months (You, Spouse), and Amount expected next month (You, Spouse). Rows include Employment, Self-employment, Income from real property, Interest and dividends, Gifts, Alimony, Child Support, Retirement, Disability, Unemployment payments, Public-assistance, Other, and Total monthly income.

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
Fox Consulting Firm	164 Market St. Suite 117 Charleston, S.C. 29401	July 2011 to present	\$ 1200.00
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
n/a	n/a	n/a	\$ n/a
_____	_____	_____	\$ _____
_____	_____	_____	\$ _____

4. How much cash do you and your spouse have? \$ 0
Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Financial institution	Type of account	Amount you have	Amount your spouse has
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

- Home
Value 140,000.00
- Other real estate
Value _____
- Motor Vehicle #1
Year, make & model _____
Value _____
- Motor Vehicle #2
Year, make & model _____
Value _____
- Other assets
Description _____
Value _____

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
<u>None</u>	\$ <u>0</u>	\$ <u>0</u>
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____

7. State the persons who rely on you or your spouse for support.

Name	Relationship	Age
<u>None</u>	<u>None</u>	<u>None</u>
_____	_____	_____
_____	_____	_____

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate.

	You	Your spouse
Rent or home-mortgage payment (include lot rented for mobile home)	\$ <u>1,000.00</u>	\$ <u>0</u>
Are real estate taxes included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is property insurance included? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ <u>740.00</u>	\$ <u>0</u>
Home maintenance (repairs and upkeep)	\$ <u>0</u>	\$ <u>0</u>
Food	\$ <u>300.00</u>	\$ <u>0</u>
Clothing	\$ <u>300.00</u>	\$ <u>0</u>
Laundry and dry-cleaning	\$ <u>80.00</u>	\$ <u>0</u>
Medical and dental expenses	\$ <u>100.00</u>	\$ <u>0</u>

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ <u>100.00</u>	\$ <u>0</u>
Recreation, entertainment, newspapers, magazines, etc.	\$ <u>250.00</u>	\$ <u>0</u>
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>94.00</u>	\$ <u>0</u>
Life	\$ <u>0</u>	\$ <u>0</u>
Health	\$ <u>0</u>	\$ <u>0</u>
Motor Vehicle	\$ <u>0</u>	\$ <u>0</u>
Other: _____	\$ <u>0</u>	\$ <u>0</u>
Taxes (not deducted from wages or included in mortgage payments)		
(specify): <u>property taxes</u>	\$ <u>120.00</u>	\$ <u>0</u>
Installment payments		
Motor Vehicle	\$ <u>0</u>	\$ <u>0</u>
Credit card(s)	\$ <u>50.00</u>	\$ <u>0</u>
Department store(s)	\$ <u>0</u>	\$ <u>0</u>
Other: _____	\$ <u>0</u>	\$ <u>0</u>
Alimony, maintenance, and support paid to others	\$ <u>800.00</u>	\$ <u>0</u>
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0</u>	\$ <u>0</u>
Other (specify): _____	\$ <u>0</u>	\$ <u>0</u>
Total monthly expenses:	\$ <u>3,564.00</u>	\$ <u>0</u>

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

Yes No If yes, describe on an attached sheet.

10. Have you paid - or will you be paying - an attorney any money for services in connection with this case, including the completion of this form? Yes No

If yes, how much? _____

If yes, state the attorney's name, address, and telephone number:

11. Have you paid—or will you be paying—anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

Yes No

If yes, how much? _____


If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of this case.

*I have to file 22 affidavits of indigency of the same kind
paid. I can not afford 22 affidavits of the same kind
Common pleas filings in the state of South Carolina. I can
not afford 22 filings fees at the same time.*

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 15th of July, 2017


(Signature)

4

No. S. 4 2017-001188

In the Supreme Court of the United States of America

Glynndeavin von Fox,

Petitioner,

v.

Belmond Hotel Charleston Place,

Respondent.

On Petition for a Writ of Certiorari to the Supreme Court of Appeals Under Rule 13 of the
United States of America Supreme Court, Washington DC

Petition for a Writ of Certiorari

Glynndeavin von Fox
Pro Se
St. James—Goose Creek Parish
8983 University Blvd.
Ste. 104-174
N. Charleston, South Carolina 29406
843.330.7200
foxgv@g.cofc.edu

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Questions Presented

The questions presented encompass an understanding of the ability for a luxury hotel to act like a police force breaking the South Carolina Lodging Establishment Act and the United States Civil Rights Act of 1964?

The establishment of the Belmond Charleston Place Hotel is to own its property through a corporate ownership within the state boundaries of South Carolina, and the Belmond by action is allowed to maintain a presence of security for own site security matters. However, no entity in South Carolina is allowed to act like a police department or county sheriff without a South Carolina Public Safety Academy certification.

Parties to the Proceeding and Rule 29.6 Statement

Petitioner, who were Plaintiffs-Appellees below, are: Glynndeavin von Fox, spa dweller at the Belmond Charleston Place Hotel.

Respondent, who were Defendants-Appellants/Cross-Appellees below, are: The Belmond Charleston Place Hotel.

Table of Contents

Questions Presented	i
Parties to the Proceeding and Rule 29.6 Statement	ii
Table of Authorities	iii
Petition for a Writ of Certiorari	iv
Conclusion	v

Petition for a Writ of Certiorari

Petitioner Glyndeavin von Fox, respectfully submits this petition for a Writ of Certiorari.

Opinions Below

The South Carolina Court of Appeals denied the *In Forma Pauperis* filing of the appellant, and invoked Rule 13 of the United States of America Supreme Court.

Constitutional and Statutory Provisions Involved

The constitutional and statutory provisions involved are the South Carolina Lodging Establishment Act.

Statements of the Case

Glynndeavin von Fox was asked to leave the property of the Belmond Charleston Place regarding a spa treatment with a walk in appointment, which all Five Star Hotels offer around the world, and the manager of the Belmond Charleston Place Spa asked Glynndeavin von Fox to leave after falling asleep in the relaxation room after a massage for medical reasons. The security of the Belmond Charleston Place banned Glynndeavin von Fox from the property, and the corporate owner of the Belmond Charleston Place did not bar Glynndeavin von Fox from any of the properties of the Belmond Corporation including the Charleston Place Hotel. Glynndeavin von Fox filed suit in the Charleston County Court for the South Carolina Lodging Establishment Act that covers services of hotels, and that is covered for restaurants in hotels as well.

Table of Authorities

Cases

Z. Abramson v. Ritz Carlton Hotel (No. 11-2795) (2012)

Constitutional Authorities and Statues

South Carolina Lodging Establishment Act

United States of America Civil Rights Act of 1964

Other Authorities

Belmond Charleston Place Spa Rules

Reason for Granting the Petition

The reason for hearing the petition is the clear violation of the South Carolina Lodging Establishment Act by the Belmond Charleston Place Hotel.

Conclusion

Accordingly, the petition for a Writ of Certiorari should be granted.

Respectfully submitted,



Glynndeavin von Fox

St. James—Goose Creek Parish

8983 University Blvd., Suite 104-174

N. Charleston, South Carolina 29406

④

The South Carolina Court of Appeals

Glynndeavin Von Fox, Appellant,

v.

Charleston Place Hotel (Belmond), Respondent.

Appellate Case No. 2017-001198

The Honorable J. C. Nicholson, Jr.
Clarendon County
Trial Court Case No. 2016CP1006077

ORDER

Appellant has failed to provide an order on appeal that has been signed by a judge or file-stamped by the clerk of court, and a statement of when he received written notice of entry of the order on appeal, as required by Rule 203 of the South Carolina Appellate Court Rules, and letter of this Court date May 24, 2017. Accordingly, this matter is dismissed. The remittitur will be sent as provided by Rule 221(b), SCACR.

FOR THE COURT

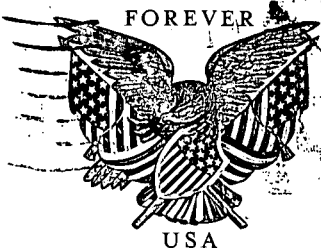
BY V. Claire Allen, Deputy
CLERK

Columbia, South Carolina

cc:
Glynndeavin Von Fox
Allan R. Holmes, Sr., Esquire

FILED

June 8, 2017



The South Carolina Court of Appeals

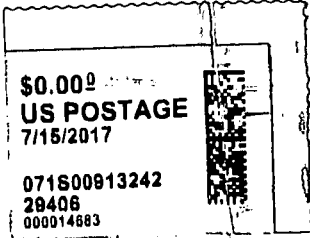
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