

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM EDGEFIELD COUNT.

Court Of Common Pleas

JOHN F. BYRD, Jr., Special Referee

RECEIVED

SEP 18 2017

SC Court of Appeals

Case No.: 20121- CP – 19 -097

.....

Re: Beverly Ann Gilchrist ----- Appellant

VS. Florence Miles, et al

.....

Appellate Case No.: 2017 – 000997

BEVERLY ANN GILCHRIST

132 SAMUEL E. DIGGS RD.

TRENTON, SOUTH CAROLINA

29847

PHONE # (803) 336-8353

E-MAIL: beverlybrowngilchrist62@yahoo.com

Jenny Abbott Kitchings

Clerk

SC Court of Appeals

Columbia, SC 29211

THE SOUTH CAROLINE SUPREME COURT

.....
RE: Appellate Case No.2017-000997.....BVEVERLY ANN
GILCHRIST.....Initial Brief.....

TABLE OF CONTENT

.....

!! Introduction” to common law” process & court room
procedures;

SEC.1) Introductions to case matters;

SEC.2) Facts of case matters;

SEC.3) Constitutional, laws & statutes; to the factual truth
matters;

SECT.4) The conclusion of the fact & truth summary of the
estates Maratha “Settles” Glover; MR. J L. GLOVER SR.&
Beatrice Glover;

MARTHA " SETTLES" GLOVER (ESTATES) Sole Ownership

-
- 1.) 06/09/1992.....Matha Glover entered an agreement (collateralized deed of trust) with theCommercial Credit Corperation...{PRIMARY}..DEED OF TRUST FOR COLLATERAL WAS HER OWNERSHIP OF " ALL LAND PROPERTY" AS RECORDED IN EDGEFIELD COUNTY, COURT HOUSE PROPERTY , RECORDS..IN DEED BOOK NO. : 45, AT PG. : 608.. TAX MAP # 173 -00 -02 -003
 - 2.) 04/17/1996...MARTH GLOVER WENT INTO AN (FHA TITLE 1 PROPERTY IMPROVEMENT LOAN/ RETAIL),INSTALLMENT CONTRACT DATED : 08/07 /1996..240 MOS.GRANTED TO MR. HAYWARD BIBBS .32 ACRAE AS A (TRUSTEE DEED) AS COLLATERAL TOWARD THE PROPERTY LOAN WITH THE SOUTHERN STEEL & ALUMIUM CORPERATION...AS USE OF THE INCORPERATIONAL LAND ALSO HAS BEEN RECORDED IN THE EDGEFIELD COUNTY COURT

HOUSE RECORDS FOUND IDEED BOOK NO.: 509
PG # 318 STILL INCORPERATED WITH THE LAND
BELONG TO MARTHA GLOVER TAX MAP #
PORTION OF 173 – 00 – 02 -003
3) SEPT. 24TH/1999 MARTHA “ SETTLES “GLOVER
BECAME DECEASED.....

.....
4.) { SEE ATTACHED EXHIBIT "A" } DEED OF TRUST DATED :
08/07/1996 COLLATERAL..... FOR THE LAND IMPROVEMENT OF
THE INCORPERATED PROPERTIES OF TAX MAP # 173 -00- 02 -
003, WHICH HAD BEEN GRANTED BY" MARTHA GLOVER".. FOR
THE USE, TO IMPROVE MARTHA GLOVER'S.... PROPERTIES TO
(MR. HAYWARD BIBBS).. FOR THE USE OF THE COLLATERIZED,
{FHA TITLE 1} PROPERTY IMPROVEMENT LOAN....WITH THE
SOUTHERN STEEL & ALUMINIUM CORPERATION.

5.)02/ 09 /2004 THE SOUTHERN STEEL & ALUMIUM
CORPERATION WAS SATISFACTORYLY,PAID IN FULL,BUT WHERE
NOT....RECONVEYED BACK TO THE LAWFUL POSITION INWHICH
IT HAD BEEN TAKEN, AS RECORDED IN THE EDGEFIELD COUNTY
COURT HOUSE DEED BOOKS # 45, PG.# 608 & TAX MAP # 173 -
00 -02 -003

5.)DEC.25TH / 2001,MARTHA GLOVER'S SPOUSE PASSED
AWAY... MR. J. L. GLOVER

PG. 3) INTRODUCTIONS CONT.....

6.)03 / 01 /2010.....".BEVERLY ANN GILCHRIST"OBTAIN (LEGAL AIDE), ATTORNEY OF THE STATE,TO HELP GET LAND APPROVAL{ FHA} HAD QUALIFIED APPROVAL TO BUILD MY FAMILY A HOME.BEAUSE MY MOTHER, " BEATRICE GLOVER" ALSO AN HEIR, THE(OLDEST) TO THE ESTATES OF HER MOTHER TOO.... MARTHA SETTLE'S GLOVER AT THIS TIME.....

7.)03 /09 / 2010... I, THROUGH MY ATTORNEY,RECEIVED NOTICE OF APPROVAL ,TO BE HEARD, DATE: HELD..04/20/2010

8.) 03/21/2010...MY MOTHER,BEATRICE GLOVER,DAUGHTER OF J.L. & MARTHA GLOVER,BOTH WERE MY, MATERNAL GRAND PARENTS... *Also passed away in death & was*

9.)04/20/2010... I, BEVERLY ANN GILCHRIST HAD BEEN GIVEN PERMISSION, TO REPRESENT ALL" THREE" ESTATES....MARTHA , J. L. , & BEATRICE GLOVER IN ORDER TO BE CARRIED OUT AND ARRIVE AT THE PROPER PROCEDURES IN ACCORDENCE WITH SOUTH CAROLINA'S RULES OF PROBATIONS.....

10.) 06/10/2010.. DEEDS OF DISTRIBUTION, WAS RECORDED BY BEVERLY ANN GILCHRIST AT EDGEFIELD COUNTY COURT HOUSE @ 1: 42 PM....

11.) 06/15/2010..PROBATE JUDGE ROBERT E. PEELER WERE INFORMED,(1) TRACK OF LAND HAD NOT AND WILL NOT BE " DISSTRIBED AT THIS *time* THE REPRESENTATIVE, BEVERLY

GILCHRIST WANTED TO INVESTIGATE FOR POSSIBLE
FRAUDULENT ACTIVITIES.....TAX MAP # 173 -00 -02 -003...

FACTS OF THE CASE

.....

1.)06 / 10 / 2010.... 1:42 PM;- DEEDS OF WERE RECORDED BY THE NOW "GRANTOR"; BEVERLY ANN GILCHRIST ; IN THE EDGEFIELD , SC COUNTY COURT HOUSE ,-----DEED BOOK # 1288 & PG. # 215 – 221 & BOOK # 228 PG # 222 – 228

2.) GRANTOR; WAS GRANTED , 1 /2 (HALF) OF THE "DECEDENT'S INTEREST",AS " REP." ; FOR THE ESTATES OF MR. J. L. GLOVER,SR.

3.) GRANTOR; WAS ALSO, GRANTED; 1/20, OF " DECEDENT'S INTEREST" AS " REP. " OF, HEIR; BEATRICE GLOVER'S, ESTATE'S (OF THE, MARTHA "SETTLERS" GLOVER'S ESTATES);DEED BOOK # 288 PG. # 215 -221.

4.) GRANTOR; WAS GRANTED , 1/10 (OF DECEDENT'S INTEREST)OF, " MR. J. L. GLOVER" SR., AS REP. FOR HIS HEIR, (DAUGHTER)BEATRICE GLOVER, DEED BOOK # 1288 & PG. # 222 -228.

5.)AN AUTHORITATIVE, CORRECTIVE WITNESS,DOCUMENTED AS WELL AS ,PUBLICLY MADE KNOWN THESE TRUTHS, ATTORNEY , AT LAW; HERBERT E. BUHL, III , ESQUIRE;

TO: A ONE; MR. JOHN F. BYRD, JR. EQUIRE; & (PRESIDING) REFEREE ;02/05/2016,10:AM;

JENNIFER P. SUMMER, ESQUIRE; (ATTORNEY), FOR DEFENDANT,
ODELL GLOVER: ANDERSON & SUMMERS, LLP.

PATRICK McWILLIAMS, ESQUIRE (GUARDIAN AD LITEM);

DOCUMENT DATED: SEPTEMBER 30, 2016;

THE CORRECT PERCENTAGE DUE: MS. GILCHRIST; ACCORDING
TO THE DEEDS ON FILE, WITH AT THE EDGEFIELD COUNTY
COURT HOUSE PROPERTY DEEDS OF ; MARTHA " SETTLES"
GLOVER ; MR. J. L. GLOVER SR.; & MS. BEATRICE GLOVER;

DEEDS DATED : 06 /10 /2010; MS. GILCHRIST ACCORDING TO
DEED BOOK NO.1288, PG.# 215 – 221 & PG. NO. 222 – 228;

A.) MS. GILCHRIST ARE ENTITLED TO (1/2) % of MATHA "
SETTLES" GLOVER; PROPERTY INTEREST(" ALONE ");

B.) MS. GILCHRIST ALSO, ENTITLED TO A (1/10)% PROPERTY
INTEREST OF MR. J.L. GLOVER SR. ;

C.) MS. GILCHRIST ARE ALSO AS WELL ENTITLED TO A ;(1/20)%
AS THE PERSONAL REP. OF "ALL" PROPERTIES;

D.) MS. GILCHRIST ARE ENTITLED TO ; (1.4)% INTEREST OF
BEATRICE GLOVER'S IN THE PROPERTIES ;

THAT IN " ALL" ROUGHLY CALCULATED IT IS MS. GILCHRIST 'S
POSITION THAT SHE IS....ENTITLED TO APPROX. SIXTY
PERCENT (60) % OF THE PROPERTY UNDER THE DEEDS.

CONSTITUTIONAL LAWS & STATUES

.....

ACCORDING TO "THE BLACK'S" LAW

SIXTH EDITION

CENTENNIAL EDITION (1891 -1991)

.....

FRAUD UPON THE COURT

.....

1.ERROR :STATE EX REL. V SMITH,

197 OR. 96, 252 P. 2D 550. 555

SEE E.G FED. R. APP. P. 28.

PARKS V. PARKS 68 APP. D.C.

363, 98 F. 2D 235, 236.

ROBERTS V. STATE, IND. 492 NE. 2D 310, 313

SCHWARTZ V. KOMINSKI, 25 ILL. APP. 3D 789, 324 N.E. 2D 91,93 .

.....

CIVIL CONSPIRACY :

2. LAKE MORTGAGE CO, INC. V. FEDERAL NAT. MORTGAGE ASS'N 159
IND. APP 605, 308 N.E. 2D 793, 744.

.....

3.) THEFT : PEOPLE V. SIMS. 29 ILL. APP. 3D 815. 331 N.E. 2D 178,179.
KIDWELL V. PAUL REVERE FIRE INS. CO., 294 KY. 833, 172 S.W. 2D 639.

640;

PEOPLE V. PILLSBURY. 59 CAL. APP. 2D 107, 138 P. 2D 320. 322.

(A)OBTAINING OR EXERTING UNAUTHORIZED CONTROL OVER
PROPERTY;

(B)OBTAINING BY DECEPTION CONTROL OVER PROPERTY ;

(C)OBTAINING BY THREAT CONTROL OVER STOLEN PROPERTY
KNOWING THE PROPERTY TO HAVE BEEN STOLEN BY ANOTHER;

.....

(4)FRAUD: DELAHANY V. FIRST PENNSYLVANIA BANK, N.A. 318 PA. 90,
464 A. 2D 1243, 1251.

JOHNSON V. McDONALD, 170 OKL. 117, 39 P. 2D 150.

CITIZENS STANDARD LIFE INS.CO. V. GILLEY, TEX. CIV. APP. 521 S.W. 2D
354, 356.

(5) BIAS: STATE EX REL. MITCHELL V. SAGE STORES CO. 157 KAN. 622,
143 P. 2D 652, 655.

6.) 06 / 10 /2010 -03 /2015 MS. BEVERLY ANN GILCHRIST,
HAS FUNDED ROUGHLY, OVER ; \$15,973.38 OF MY WELL
DOCUMENTED PERSONAL FUNDS IN THE UP KEEP AND
RUNNING OF" ALL" OF MATHA "SETTLES " GLOVER'S ESTATES
TAXES,LEGALITIES,ECT.

Constitutional Laws & Statues Cont-

Forgery: (A) (B) (C) MODEL PENAL CODE, 224.1. &SEE ALSO

Mpc&241.7,

“Tampering with or fabricating physical evidence”

State v. May, 93 Idaho 343, 461 P.2D 126, 129.

PEOPLE V. CAL. RPTR. 333,337.

STATE V. GORANSON, 67 WASH.2D 456,408 P. 2D 7, 9.

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CONCLUSION

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IN CONCLUSION: I, BEVERLY ANN GILCHRIST, AS A CITIZEN OF THE "UNITED STATES OF THE AMERICA'S"; WANT THE "SUPREME" COURT OF SOUTH CAROLINA, JUDICIAL SYSTEM TO UPHOLD MY CIVIL LIBERTIES, UNDER THE CONSTITUTIONAL, DEVIN COMMON LAW MADATES OF THE U.S.OF A. STATUTES.

JUNE 10,2010 UNDER THE LAND PROPERTY DEEDS BELONGING TO THE ESTATES OF MY "MATERNAL" GRANDPARENTS, MARTHA "SETTLES" GLOVER & J.L. GLOVER SR. AND MY, MOTHER" BEATRICE GLOVER AS REPRESENTATIVE, NOW THE GRANTOR ARE ENTITLED TO ROUGHLY (60)% OF THE LAND PROPERTIES OF THE ESTATES;

SINSERELY: THE GRANTOR BEVERLY ANN GILCHRIST

DATED: SEPTEMBER 15, 2017



Beverly Ann Gilchrist
132 Samuel E. Diggs Rd
Trenton, SC 29847 PRO/SE


Dear Ms. Kitchings,

This letter is to inform the court, of our "constitutional" RIGHTS
As UNITED STATES ,Citizens when entering any court room in A PRO/SE ,
Capacity....under the UNITED STATES CONSTITUTIONAL LAW, The pro/se
proceedings are to be conducted in a differant manner, of The structured
and restrictive fuctions of Attorney at law (Bar) STATUS..QUO, that's A
Constitutional Mandate that A (presiding Judge),Conduct themselves in away,
INWHICH..... (COURT PROCEEDINGS OR PROCESSES), UPHOLDS THE...,
common law citizens civil liberties, UNDER WHICH COURT OFFICALS OATHS
ARE TAKEN SWORN to, not just to upwhole, but to also protect the citizens
under the constitutional, devine, common law, mandate Of the UNITED STATES
OF AMERICA'S for truth and justice, are to be the liberaties for ALL, STATUS
QUO.....

SINCERELY

Ms. Beverly A. Gilchrist

STATUS QUO.....PRO/SE



Beverly Ann Gilchrist
132 Samuel E. Diggs Rd
Trenton, SC 29847 PRO/SE

09/13/2017

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THE SOUTH CAROLINA COURT OF APPEALS

.....
Appeal from Edgefield County

John F. Byrd , jr. Special Referee

.....
Case No. : 2014 – CP -19 – 097

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SC Court of Appeals

.....
Beverly Ann Gilchrist

132 S.E. Diggs Road

Trenton, SC 29847

Re: BEVERLY ANN GILCHRIST..... APPELLATE

VS. FLORENCE MILES,ODELL GLOVER, et al.....RESPONDENTS

.....
APPELLATE Case No. 2017 - 000997

CC : Jennifer P. Summers, *ESQUIRE*

P.O. Box 502

Edgefield , SC 29847

Dear Ms. Kitchings,

These Documents are construed to be anititial brief.

In accord with PRO/SE CASE LAWS FOUND IN THE " BLACKS LAW " SIXTH
EDITION (CENTENNIAL EDITION)1891 – 1991..... SOWERS V. OHIO CIVIL
RIGHTS COMMISION 20. OHIO MISC. 115, 252 N.E. 2d 463, 476.