

**AMENDED DESIGNATION OF MATTER TO BE INCLUDED IN  
THE RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM COLLETON COUNTY  
Court of Common Pleas

Carmen T. Mullens, Circuit Court Judge

Case No. 2017-001017

**RECEIVED**  
FEB 12 2018  
SC Court of Appeals

Lynne Van House

Appellant

v.

Colleton County,

Respondent

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**AMENDED DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL**  
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**Appellant proposes the following be included in the record on appeal:**

SUMMONS-Magistrate Court Seizure Hearing—May 31, 2016

ORDER-Magistrate Court-granting temporary custody of animals to Colleton County—filed June 1,  
2016

LETTER—From Ben Sapp—indicating my *right to file* a motion to have animals returned—June 8,  
2016

ORDER—Magistrate Court—relieving Ben Sapp as Counsel—filed July 11, 2016

SUMMONS—Magistrate Court Motion for Reconsideration of Order of temporary custody of  
animals to Colleton County, and Motion for Return of animals—for June 21, 2016

ORDER—Magistrate Court--Continuing and rescheduling Motion for Reconsideration Hearing  
from June 21, 2016 to July 12, 2016 due to son's illness in the Courtroom

MOTION—Magistrate Court—for Reconsideration of Order of June 1, 2016—Hearing July 27,  
2016

MOTION—Magistrate Court—to suppress evidence—filed August 15, 2016

MOTION—Magistrate Court—for *Discovery* of evidence—filed September 21, 2016

APPEAL—Notice to Common Pleas Court—Appealing Petitioner's Motion for a Mistrial; Motion to Exclude Evidence, and Motion to Reconsider Order denying return of dogs due to the “Enforceable Agreement”—filed September 21, 2016

PROPOSED MOTION—Petitioner's--*dismissing* the “Enforceable Agreement” Order written by Mr. Bennett and Ordering return of animals, with citations—included per Judge Duffie

LETTER—by Petitioner to Judge Buckner requesting *extension* of time to file my Reply to his Answer to my Appeal to Common Pleas. --dated December 23, 2016

LETTERS—from Public Defender-Mr. Matthews—indicating a Hearing before Magistrate to determine *if* evidence justifies sending *CRIMINAL* warrants before the Grand Jury—September 13, 2016, October 11, 2016, and October 31, 2016

MOTION—for *Discovery* as handed to Public Defender Mr. Matthews—September 13, 2016

LETTER—from Judge Duffie to Judge Buckner requesting extension to prepare his Answer to Common Pleas Court from my Appeal—to November 15, 2016

RETURN—Magistrate Court—Judge Duffie's synopsis/Answer of the 10+ hours of testimony—*from which* Mr. Thornton drew his *Respondent's Initial Brief* to Appeals Court--Filed November 14, 2016—only pertinent pages as listed

LETTER—from Judge Buckner to Judge Duffie granting extension—filed November 16, 2016

LETTER—from Common Pleas Court—Motion Roster—my Motion added to Docket for November 23, 2016

MOTION—from Petitioner for *Discovery* of evidence—filed *with* Appeal to Common Pleas—signed September 19, 2016

MOTION—from Petitioner for *Reversal of all Orders* from Magistrate Court, and a Compel to Produce Evidence Motion *from* Motion for Discovery filed *with* Appeal to Common Pleas Court and not answered—November 28, 2016

REPLY—Petitioner's response to Magistrate Court Judge Duffie's Return to my Appeal to Common Pleas Court—filed January 10, 2017

LETTER—from Common Pleas Court—Motion Roster—my Motion added to Docket for February 6, 2017 and LETTER changing to February 8, 2017

LETTER—from Common Pleas Court—Motion Roster—my Motion added to Docket for March 17, 2017

ORDER—Common Pleas Court—denying my Motions of Nov. 28, 2016 above—filed March 22, 2017

Copies of all 9 misdemeanor tickets written on Friday, May 13, 2016

The full transcript of all testimony, discussion, and conversation during Appellant's verbal testimony in Common Pleas Court

Copies of all 10 “Criminal” warrants issued June 3, 2016, with individual dog’s numbers in the charges.

A copy of Plaintiff’s Exhibits – copies of the two e-mails purporting an “enforceable agreement” allowing surrender

A copy of Plaintiff's letter from Judge Duffie demanding retention of all seizures until June 15.

A copy of The receipt for money paid to Mr. Sapp for him to defend me.

A copy of the thumb drive recording all 10+ hours of Magistrate Court hearings, *if available in Multiple amounts*

Copies of those few actual seizure pages that included an opinion of physical condition.

\*Appellant’s Exhibits from Magistrate Court:

Exhibit # 1—Definition of the “Grandfather” clause

Exhibit #2---Definition of Criminal Trespass in general

Exhibit #5---4th Amendment—US Constitution--Warrantless searches, surveillance, privacy

Exhibit #6---5<sup>th</sup> Amendment—US Constitution—Due process, taking property for resale, incrimination

Exhibit #7---”Miranda” type rights, confront witnesses and evaluate evidence

Exhibit #8---8<sup>th</sup> Amendment—US Constitution—no excessive bail

Exhibit #13--”Collusion”--US Code, Titles 18-241 and 18-242

Exhibit #16---Press and Standard newspaper article on-line about seizure

Exhibit #17---Hand drawn schematic of Appellant's property with roads and buildings

Exhibit #18---Overhead photo of Appellant's real property—Google Earth

Exhibit #19—Benton's feed—sales and charged tickets—5+ months

Exhibit #20---Bill of sale for puppies sold—how filled out with shot record

Exhibit #21—Reviews from PuppyFind, on-line sales site—many pages

Exhibit #22—Statement “My Defense at the Seizure Hearing” which was not read there by Mr. Sapp

Exhibit #24—photos of Appellant's feed bin, vaccines in her fridge, no trespass signs surrounding property, at the road, and from gate inward, mailbox with 4 addresses

Exhibit #25—Animal health and care supply orders from Revival Animal Health—10 years

Exhibit #26—Landing page for Appellant's kennel website—www.phoenix-kennel.com showing facility completely closed and why

Exhibit #27—List of animals seized during raid by breed and name

Exhibit #28—photo of dog that was shown at shelter with deep wounds on nose from a nylon rope—*this* photo taken Friday before raid

Exhibits #29-30—two articles about animal activism and animal enterprise terrorism

Exhibit #31—Pet Business magazine article titled “Swept Away?” about animal activism killing the multi-billion dollar pet business in the US

Exhibits #32-33—Articles about over vaccination dangers in pets written by Vets

Plaintiff's Exhibit #1—E-mail purporting the authority to surrender my animals one day after they were ordered to be held

Plaintiff's Exhibit #2-- Judge Duffie's Order demanding all the animals be held until June 15 to await Motion to ask for return to Appellant

Plaintiff's Exhibit #4—Another e-mail about the purported surrender of my animals, and holding out possible criminal charges being made

Plaintiff's Exhibit #9---Results from first Vet exam at Shelter, for each animal, by number assigned

The full proposed Order accepted by Judge Duffie to be considered in the judgements of Colleton County statute about ill-treatment of animals, annotated

Two Coastal Coop electric bills showing different addresses for my trailer and my dog pens

Colleton County animal enforcement statutes, annotated

From Plaintiff's Exhibit #9-- a listing of the weight and vital signs of each dog seized on May 16, 2016, listed by the County's assigned number, and compiled by breed

A listing of the dogs seized, and including probable replacement breeders over the next 10 years, and possible loss of income

Hand written receipt from Ms. Taylor indicating return of one of Appellant's crates

Article about titer tests and over-vaccination

Article about healthy breeding animals seized in Missouri and shipped to California to be sold

Three photos of obese dogs advertising well-known companies

Article titled "Animal Shelter Fraud"

Article titled "Animal Control Terrorists"

Article titled "Dept. of Homeland Security eco-terrorism report"

Article titled "FBI Top Terrorists: ALF and ELF"

Article titled "Your Dog's Best Friend May Be His Attorney"

Article from Press and Standard newspaper on-line –Ms. Taylor asserting she'd "recently talked to me" and I'd "agreed" to surrender the animals

A copy of the letter from Mr. Thornton dated June 28 asserting that only 22 animals were left, and he could not comply with the Order of June 1

A full copy of Appellant's criminal background check—showing only misdemeanors that have not been adjudicated after over 20 months

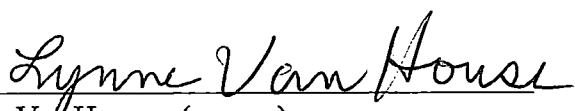
Article titled "This Growing Movement is Pitting Pet Owners Against Vets"

Copies of both search warrants with what was *to be* seized, and designation or list of what was seized, per the County

Copies of the 10 Grand Jury *Indictments* from the "criminal" charges which resulted in *only misdemeanor* charges on my background check

**I certify that this Designation contains no matter which is irrelevant to this appeal.**

February 8, 2018

/s/   
Lynne Van House (pro se)  
19897 Augusta Hwy  
Round O, SC 29474  
(843) 835-8038