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BEFORE THE SUPREME COURT OF SOUTH CAROLINA

Appellate Case No. 2016-002541

S.C. SUPREME COURT  
State of South Carolina, and City of Columbia, SC  
v. Marie Assa'ad-Faltas, MD, MPH

On Petition for a writ of certiorari  
To the Court of Appeals of South Carolina

Seventh SUPPLEMENT TO MOTION to Appoint Counsel for Rehearing OR to Allow Petitioner to Argue Rehearing pro se; AND, in either case, to Extend the Time to File for Rehearing.

*Can both fresh water and bitter water flow from the same spring?*

James 3:11

*It is not that a liar cannot tell a truth. A liar can tell the truth once in a while; but a truthful person cannot tell a lie.*

Dr. Faltas' 23 February 2010 opening pp 29-30

Brutality is evidence of malice.

Solicitor Luck-Campbell's 3 August 2012 closing in State v. DaQwan Johnson, Inmate No. 351891

*Take heed to yourselves: If your brother should sin, rebuke him; and if he should repent, forgive him.*

Luke 17:3

*Peter [...] said, Lord, how oft shall my brother sin against me, and I forgive him? till seven times? Jesus said to him, [...]: but, Until seventy times seven*

Matthew 18:21-22

Justice and tyranny cannot flow from the same court;<sup>1</sup> nor a wise one utter stupidity. The brutality inflicted on Dr. Faltas adds proof that known-false criminal charges were brought against her in extreme malice.

Emperors cannot be attired by stifling all "the emperor has no clothes" cries; nor prosecutors edified by falsely branding "frivolous, vexatious" one who *pro se* proved prosecutorial misconduct in her own case.

To shield Dr. Faltas' tormenters, this Court *inter alia* accused her of acts *objectively* belied by this Court's own [www.sccourts.org/CaseOfMonth/Jan2011](http://www.sccourts.org/CaseOfMonth/Jan2011) as it shows not a whisper or stir by Dr. Faltas during oral argument of *State v. Duncan*, contrary to Opinion 27723 at p 3. Annotations of only the objectively-proven perjuries, forgeries, fabrications and lies to the jury and to then-presiding Judge Newman, père, by Teresa Ingram and then-Assistant Solicitor Weiss total 378 in under six hours<sup>2</sup>, below the 70X7 limit BUT unforgivable without repentance, for Matthew 18:21-22 must be read in light of Luke 17:3.

May this Court rise to vindicate the victim as it should instead of stooping to falsely insult her *all it can*.

And for what? So that Weiss could to run for a judgeship only to be thwarted by reports that she "dismiss[es] unethics to win [her] cases" (28 November 2017 Public Hearing Tr p 88 line 15 to p 89, line 25)? Or so that Larry Wayne Mason can save the money he would have paid to reroute his/Steele's illegal sewer lines away from Dr. Faltas' and her mother's land and give it to his sons for one to drink/drug himself into suicide and the other to bail himself of charges of criminal domestic violence and unlawfully carrying pistol?

May a summation of Dr. Faltas' ten-year ordeal finally shake off this Court's soul the lust to oppress her and replace it with a zeal and a joy to compensate her,<sup>3</sup> to cause her abusers' repentance, and to edify the system.

Dr. Faltas has now combined Teresa Ingram's testimony in one document, arranged the 99 photos introduced by the Prosecution during said testimony in groups, and filed it electronically with the US Court of Appeals for the Fourth Circuit, mainly as appendices to the Amended Petition for Rehearing (AR) in 17-1672 before that court.<sup>4</sup>

The annotations,<sup>5</sup> procedural history in relevant courts, transcripts, audios and videos before and after that 22-26 February 2010 trial leave no doubt that Weiss conspired with the City of Columbia's Police Department ("CPD"), Dinah Steele, and Larry Mason *inter alia* to bring known-false criminal charges against Dr. Faltas for Steele and Mason to gain unfair advantage in civil litigation. This Court condoned and assisted that scheme at every step, starting with punishing Dr. Faltas for her *pro se as-applied* challenge to a statute used to jeopardize her with six years' incarceration for looking out of her own window when her neighbors caused commotions in the common areas of the two rental quadrplexes where she then lived, and continuing with false pretenses that Dr. Faltas abused the judicial system and must to be barred from *pro se* civil claims and all appeals. The truth is: the system

<sup>1</sup> Any "justice" would be but a façade cloaking the daggers of tyranny under robes of feigned righteousness.

<sup>2</sup> In February 2010, on Tuesday the 23<sup>rd</sup>, 4:43 to 5:26 pm = 43 minutes; Wednesday, the 24<sup>th</sup>, 2:19 to 5:55 pm (colloquy 5:55 to 6:11 pm) = 3 hrs. 36 minutes + 16 minutes of colloquy; Thursday, the 25<sup>th</sup>, 9:47 to 10:41 am (colloquy 10:41 to 11:07 am) = 54 minutes + 26 minutes of colloquy for a total of 5 hours 13 minutes of testimony + 42 minutes of colloquy.

<sup>3</sup> Dr. Faltas had annotated, and filed with this Court, Parts I, II and III of Teresa Ingram's complete testimony in Dr. Faltas' 22-26 February 2010 General Session jury trial and the colloquies interspersed with that testimony and following its end.

<sup>4</sup> The rehearing itself was denied, but the motion to amend was granted; and it is all available to this Court through PACER.

<sup>5</sup> Most perjuries were repeated and are counted each time they were uttered to show lack or retraction/correction.

abused Dr. Faltas by falsely charging her; and her *pro se* defeat of those falsehoods make her the most deserving person in South Carolina to be *always heard pro se*.

Weiss' and her co-conspirators' malice, *indulged by this Court*, is evident in the four stages where *if this Court did not know about the perjuries in one stage, it had to have known about them in the next*:

1. **From 18 September to 2 December 2009:** From Larry Mason's letters to then-City-of-Columbia Attorney Ken Gaines to Dr. Faltas' 2 December 2009 arrest on two false warrants of harassment in the first degree pretended by Dinah Steele and Teresa Ingram.<sup>6</sup>
2. From 2 December 2009 to 26 February 2010, when the jury deadlocked.
3. From 1 March 2010 to 13 August 2012 when the harassment charges were dismissed with prejudice.
4. From 13 August 2012 to the present when Dr. Faltas is treated as guilty after exonerating herself.

A stark example is the insane perjury that Dr. Faltas took "hundred, thousands" of photos of Ingram, her family and her "guest," Corey Corey, who was Ingram's drug dealer, to use them for "root on [Ingram], voodoo" Tr p 305, lines 13-15. Dr. Faltas took of Teresa ONLY 57 photos, in 13 sets provoked by Teresa/her "company," specifically:

- (1) 12 September 2009: (5 photos) State Exx 22-26; Teresa's "friend-associate," Corey Curry, blocked the parking lot. Vide Tr. pp 215, line 10 to 216, line 16, *supra*, and pp 269, line 12 to p 271, line 15, *infra*.
- (2) 13 September 2009: (3 photos) State Exx 17, 18 and 19; Teresa's planted herself in front of the building where Dr. Faltas lived and threatened to vandalize the vehicles she parks there. Vide note 119, *supra*, and Tr. p 268, lines 12-15.
- (3) 15 September 2009: (4 photos) State Exx 13-16; Teresa's "company," Wendy Ceo, has a blue camera pointed at Dr. Faltas. Vide note 116 and Tr. pp 213, line 1 to 214, line 8, *supra*, and Tr. pp 237, line 13 to 241, line 15, *infra*.
- (4) 24 September 2009: (5 photos) State Exx 6-7, 27-28, and 77; Teresa and her brother called police on Dr. Faltas falsely claiming that she was blocking Rodney's car. Vide Tr. pp 208, line 12 to 209, line 12, *supra*, and p 269, lines 1-11, *infra*.
- (5) 13 October 2009: (8 photos) State Exx 31, 37 and 42; "Micth" Jones, tenant of the apartment below Dr. Faltas' called her out to the back balcony and started verbally abusing her. Vide note 132, *supra*, and Tr p 217, lines 1-24 and on cross pp 280, line 13 to 283, line 11, *infra*.
- (6) 15 October 2009: (3 photos of car driven by Teresa, who is not visible there) State Exx 42-44; Teresa followed Larry Mason to go file complaint against Dr. Faltas. Vide Tr. p 218, lines 6-8, *supra*, and p 264, line 5 to 265, line 8, *infra*.
- (7) 16 October 2009: (2 photos) State Exx 45, 46; Teresa stood under Dr. Faltas' window making loud threats under guise of conversing with "company." Tr. P 218, lines 9-22, *supra*, and 266, lines 5-16, *infra*.
- (8) 17 October 2009: (6 photos) State Exx 49, 54; Dr. Faltas returned from an errand to find Teresa with a wire coat hanger in her hand and three men hooking a truck to tow it away, and blocking her mailbox in the process. Afraid her own truck "might be next," Dr. Faltas silently took the photos from a safe distance to also document the event, Tr. p 260, line 17 to p 263, line 2, and pp 415-20, *infra*.
- (9) 18 October 2009: (4 photos not offered by the Prosecution) Teresa stood under Dr. Faltas' window talking loudly to Jones in his SUV.
- (10) 21 October 2009: (16 photos) State Exx 55, 76; Corey Curry threatened to rape Dr. Faltas and continued making lewd gestures at her; yet, Teresa called 9-1-1 falsely accusing Dr. Faltas of having thrown rocks out of her car, a physically impossible task.
- (11) 22 October 2009: (1 photo not offered by the Prosecution) Teresa stood opposite Dr. Faltas' window talking loudly.
- (12) 23 October 2009: (2 photos of car being driven by Teresa, who is not visible in the photos) State Exx 82 and 83; Teresa often drove across Dr. Faltas' car when she sat in it. Tr. p 263, line 3 to p 264, line 4, and p 278, lines 20-23, *infra*.
- (13) 5 November 2009: (3 photos) State Exx 86, 87, and 89; Teresa called police on Dr. Faltas solely to build a record against her. Vide notes 112 and 154, *supra*, also vide notes 87, *supra*, and Tr. pp 349-51, *infra*, for the physical impossibility of the "rocks" story

State's other Teresa-identified 41 photos are of PWID-cocaine felon Corey Lamont Corey making lewd gestures at Dr. Faltas or of buildings and vehicles which Teresa does not even own. Dr. Faltas took ALL relevant photos from her car(s), window, or balcony, always at a distance of over 20 feet from the photo's subject.

Extreme malice is evident in the conspirators' insistence that, as the statute says "private life," not "private residence," any photo outside one's private residence invades one's private life and proves "unwanted visual contact"/"surveillance." Thus, Ingram, Cocaine Dealer Curry, and Steele drew around themselves vast swathes of public streets, common parking lots, commercial stores, etc., called their activities there their "private life," and criminalized Dr. Faltas' even looking at public areas WHERE NO EXPECTATION OF PRIVACY EXISTS.

None of this would have possible without this Court's 20 December 2009 ORDER castigating Dr. Faltas' effort to challenge the statute *as applied to her* and subsequent self-admitted "extreme" restrictions on her.

None of this would have been possible to continue unpunished this long had Opinion 27723, at p 3, not glorified the tyranny of U.S. Magistrate Judge Lawrence Patrick Auld knowing that he is the only male paternal-paternal first cousin to CPD Sergeant James Auld, a key defendant for having falsely arrest Dr. Faltas on 12 December 2009 under the unconstitutional "unlawful use of telephone" statute Dr. Faltas tried to challenge.

<sup>6</sup> CPD-made video of that arrest shows CPD "Investigator" Amanda Blanton displayed to Larry Wayne Mason the arrest and search warrants in front of Dr. Faltas' building and boasted "I signed them for you, Wayne."

<sup>7</sup> Dr. Faltas implores this Court to cause the exhibits on the attached CDs to be downloaded directly onto C-track instead of the laborious manual scanning of paper documents which results in less scrutable photos and less legible text.

Of faith, hope and love, Dr. Faltas had the latter two for this Court and hopes they can work the miracles needed for this Court to earn Dr. Faltas' faith in it.

Dr. Faltas *hopes* this Court uses these *loving* submissions to examine its own conscience and to render he whole in all aspects, including *sua sponte* reopening all cases in which Dr. Faltas showed that fraud upon the courts was perpetrated by her opponents, including reopening and hearing her challenges to SC's maddeningly vague and overbroad harassment and unlawful use of telephone statutes, and including *inter alia* taking the lead in holding that first cousins are *genetically* within the third degree of relationship therefore judicial officers are *mandatorily* recused when a first cousin of the jurist is a party, attorney, witness, or otherwise interested, in the case.

The anachronistic calculation of degrees of relationship based on the literally paternalistic parent-tellic system of inheritance dates from the time when women were not allowed to own property *in the United States or South Carolina*. Under recent U.S. Supreme Court decisions, statutes incorporating outdated stereotypes about women are unconstitutional. This Court should cast its obsession with proving Dr. Faltas "frivolous" and, instead, let her guide this Court in egalitarian improvements of the law as she is one of the few willing and intellectually capable of so doing.

God willing and this Court permitting, further analysis of the four stages shall be filed ASAP.

Submitted on 12 February 2018 and served by personal delivery of a copy to the office of SC's Attorney General.

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