

placed upon Appellant's University of South Carolina account that precluded Appellant's ability to timely retrieve and respond to the Court's Order as entered December 2, 2019. Appellant retrieved that Court Order December 17, 2019 and now responds, having simultaneously attempted to assist Appellant's mother Beverley D. Wilson, to the extent possible, to undertake measures to halt the repeated robberies of Appellant's home and facilitate the identification of those robbers for prosecution while respecting the limitations imposed by Appellant's spectral PTSD and depression. Additionally, Beverley D. Wilson's only computer, a MacBook Pro was stolen November 15, 2019 presenting an enormous encumbrance in the facility of sharing of files in this case with Appellant to assist Appellant in preparing a response to the Court's December 2, 2019 Order.

Repeated robberies of Appellant's home have aggravated Appellant's spectral PTSD and major depression that were precipitated and exacerbated by the Assault and Battery Appellant perpetrated upon Appellant June 25, 2018 by Respondent Tiffany Maddox, assistant residential manager of Aspyre at Assembly Station, now YUnion Apartments. Appellant underwent a prolonged hospitalization June 25, 2019 to July 27, 2019 due to that Assault and Battery. Appellant was subjected to grossly negligent medical management and improper administration of extremely potent psychotherapeutic agents by the attending physician in charge of Appellant's care, who in 2003 failed to properly diagnose Appellant as having Post-traumatic Stress Disorder secondary to sexual and physical abuse of Appellant by Appellant's biological father and Appellant's biological father's girlfriend from five and one-half to six years old to eleven and one-half years old. That attending physician refused Appellant's mother's requests to consult a

pediatric forensic specialist to perform a complete forensic examination of Appellant under anesthesia to assess Appellant for evidence of sexual abuse. Appellant subsequently underwent a forensic examination for sexual abuse by South Carolina's two pediatric forensic specialists after Duke University affiliated pediatric psychiatrists and pediatric psychologists confirmed Appellant suffered from Post Traumatic Stress Disorder. Those pediatric forensic specialists confirmed Appellant was sexually abused. Appellant's mother informed that attending physician who failed to properly diagnose Appellant as having Post Traumatic Stress Disorder secondary to sexual abuse of same and that attending physician's only response was "I would have never guessed," to which Appellant's mother replied, "You weren't asked to guess, you were asked to consult a pediatric forensic specialist in sexual abuse to confirm or disprove whether [Appellant] was sexually abused." That same attending physician medically mismanaged Appellant's psychotherapy during the June 25, 2018 to July 27, 2018 inpatient hospitalization which severely disrupted Appellant's cognitive function, memory, and physical dexterity, greatly impairing Appellant's academic studies at the University of South Carolina during the 2018-2019 academic year. Appellant's ability to on Appellant's own, as well as with full-fledged assistance from Appellant's mother and Power of Attorney, to timely complete this document responding to the Court's Order from December 2, 2019 is impaired still, though improved since Spring of 2019.

Further complicating completion of this document by Appellant in response to the Court's December 2, 2019 order are strict advisement by Appellant's pediatric psychologists that Appellant "never be forced to revisit the events of or associated with [Appellant's] sexual and physical trauma, and if so, only with qualified pediatric specialists to avoid any undue stress to

avoid triggering of Appellant's PTSD." Appellant's mother and Power of Attorney, a well-trained pediatrician of thirty years is and was recognized by those specialists as capable of providing a significant degree of stabilizing influence to Appellant in that regard as Appellant's mother has extensive training and professional experience evaluating, treating, and managing pediatric victims of sexual, physical, and emotional abuse.

Appellant's biological father was slated for criminal prosecution by then South Carolina Attorney General, now South Carolina Governor, Henry McMaster in 2007 with numerous pediatric experts set to testify on Appellant's behalf that Appellant's biological father sexually, physically, and emotionally abused Appellant. Appellant's biological father's expert witness concluded Appellant's biological father sexually and physically abused Appellant, however Appellant's biological father's expert witness' report was quashed by Appellant's biological father's attorney. Mr. McMaster then abruptly dismissed the criminal prosecution of Appellant's biological father for sexual, and physical abuse of Appellant without any legitimate explanation. Mr. McMaster proffered to Appellant's many pediatric expert witnesses, who were slated and ready to testify on Appellant's behalf, and Appellant's expert witnesses immediately thereafter related to Appellant and Appellant's mother, that then Attorney General McMaster and the District Attorneys for Richland, Lexington, and Orangeburg Counties informed Appellant's expert witnesses that then Attorney General McMaster related 'I can't guarantee I can/will win this case and this case will be expensive to prosecute, therefore, I am going to decline to prosecute/will dismiss this case.' Those pediatric expert witnesses reported they vigorously

advocated via teleconference with the aforementioned Attorney General McMaster and District Attorneys for Appellant's biological father's trial to move forward without success.

The following year, 2008, Appellant's mother was investigated by Medicaid for billing errors that were generated by Appellant's mother's medical records computer and billing system which had been hacked previously, and with increasing severity by dishonest employees to loop generate medical claims upon Appellant's mother's attempts to correct medical claims beginning when Appellant's mother sought expert care for her son at Duke University and its affiliated Pediatric Psychology Outpatient and Pediatric Psychiatry inpatient facilities. Appellant's mother was represented by attorney Stephen P. Williams, who had a conflict of interest having worked for The Regional Center of Orangeburg and Calhoun Counties who had to pay \$1 million dollars to the parents of Baby Boy Bolin for Baby Boy Bolin's wrongful death in November 1996 after Appellant's mother's exposure of a cover up scheme by TRMC neonatal nurses who provided false testimony/witnessing information in an attempt to exonerate Dr. Tracey MacPherson, wife of Senator Brad Hutto, in the death of Baby Boy Bolin and implicate Appellant's mother in Baby Boy Bolin's death. Appellant's mother was fully exonerated of any wrongdoing in Baby Boy Bolin's death. See May 24, 2010 Conspiracy Theory Letter for further details.

Attorney Stephen P. Williams fraudulently represented Appellant's mother's interests in that Medicaid billing error case and ultimately fraudulently conspired with Attorney General McMaster to craft a deeply flawed, fraudulent plea bargain agreement Attorney Stephen P. Williams coerced Appellant's mother to sign against her wishes stating "plea bargain agreements

are carved in stone and cannot be changed”... “if you wish to guarantee your freedom to ensure your children’s safety, sign this plea agreement. If you choose to go to trial instead, your ex-husband will get full custody of your children and will have the opportunity to sexually abuse them at will, if you do not win your case.”

Appellant’s mother asserted and asserts Stephen P. Williams possessed information from Appellant’s mother’s creators of Appellant’s mother’s computerized medical records and billing system that provided incontrovertible proof that Beverley D. Wilson, M.D.’s computerized medical record and billing system was hacked and generated medical claims spontaneously upon Appellant’s mother’s attempts to correct Medicaid claims for billing errors. The Beverley D. Wilson v. Stephen P. Williams, Esquire appellate case was placed on the docket of the U.S. Supreme Court February 15, 2015, but was dismissed when Orangeburg’s Middleton Street Postal branch tortiously interfered with Appellant’s mother’s timely receipt and response to a request from the U.S. Supreme Court that Appellant’s mother format the appeal in standard attorney formatting. Appellant’s mother was unable to have that case replaced on the U.S. Supreme Court docket.

Appellant’s mother and her family have been financially devastated subsequent to state and federal Medicaid exclusions and an imposed felony status subsequent to Attorney Stephen P. William’s and bankruptcy attorney Jason T. Moss’ fraudulent representation of Appellant’s mother’s interests, and Appellant’s mother’s ejection from her Harbison Way medical office by B&B Properties, Appellant’s mother’s landlords upon the express request of Governor Henry

McMaster when Appellant's mother sought assistance from the Criminal and Civil Divisions of the U.S. Department of Justice after failed attempts by Appellant's mother to have the Office of the Inspector General for the Department of Health and Human Services revisit and overturn her Medicaid exclusion case.

Appellant stepwise withdrew from all of his Spring 2019 academic course load by March 5, 2019 and asserted and still asserts Appellant's withdrawal from those classes was due to Appellant's impaired cognition, memory, and physical dexterity, which drastically impaired Appellant's coursework. Appellant progressively withdrew from his Spring 2019 University of South Carolina classes without consulting his academic advisor, the professors of the classes in which he was enrolled, or his mother and Power of Attorney, Beverley D. Wilson, M.D. After consultation with these individuals, Appellant successfully re-enrolled in his one credit hour, pass/fail Biomedical Engineering Master's Seminar after Appellant's instructor of that course ensured Appellant and Appellant's mother/Power of Attorney March 8, 2019 that he would remediate Appellant for classes missed and throughout the conclusion of the semester to ensure the seminar's coursework was properly mastered by Appellant without subjecting Appellant to undue mental stress to support Appellant's mental health.

In contravention to and subsequent to measures March 8, 2019 to re-enroll Appellant in his Biomedical Engineering Master's Seminar, Appellant's University of South Carolina student account was improperly imputed a charge of \$2071 for a Title IV Partial Tuition Reimbursement Refund by the Office of Financial Aid **after** Appellant's mother and Power of Attorney

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contacted and notified the University of South Carolina's Registrar, Bursar, and the Office of Financial Aid of Appellant's intention to re-enroll in the Biomedical Engineering Master's Seminar and ascertained there were **no holds on Appellant's USC account from either of those departments at the time of Appellant's mother's notification of those departments of Appellant's intent to re-enroll in the Biomedical Master's Seminar.** The University of South Carolina's Director of Financial Aid placed a financial aid hold on Appellant's account subsequent to Appellant's refusal and failure to tender payment for the unjust Title IV Partial Tuition Reimbursement Refund charge Appellant was **financially unable to tender.**

Appellant was unable to enroll in classes for the Fall 2019 semester until the financial aid hold was released October 31, 2019 after Appellant successfully appealed the Title IV Partial Refund Reimbursement charge imputed to Appellant's account. Appellant subsequently successfully petitioned for late enrollment to the Biomedical Engineering Graduate Program, but did not receive his financial aid overage disbursement until the last week of exams in December 2019 for the Fall 2019 semester.

Appellant has not received the transcript of the December 14, 2018 Richland County Court of Common Pleas hearing for this case despite numerous attempts to acquire that transcript from the transcriptionist of that hearing, Ms. Maryann Nevers directly and with the assistance of the transcription supervisor for the Richland County Court of Common Pleas. A renewed request for that transcript is being made to that Court's transcription department supervisor Ms. Desiree' Allen today.

Appellant again Motions that Beverley D. Wilson be added as a Co-Appellant in this Complaint and asserts Appellant's and Beverley D. Wilson's standing for same is grounded in the fact that Beverley D. Wilson, with Appellant's consent, agreed to pay Appellant's rent that was three months in arrears with two months of payment in February 2018 - and the remainder of that payment was to follow as soon as reasonably feasible for Appellant and Beverley D. Wilson, utilizing Appellant's financial overage from Spring 2018 enrollment at the University of South Carolina following receipt of that financial aid overage and additional financial contributions by Beverley D. Wilson as necessary throughout the year to timely tender the balance of Appellant's lease payments for Apartment 3106 - only upon the following conditions: (1) Aspyre immediately rescind the Restraining Order barring Beverley D. Wilson from the Aspyre campus as requested by Appellant in July 2017 when Appellant was experiencing an acute exacerbation of his spectral PTSD and was unable to rationalize his need for assistance, care, monitoring by Beverley D. Wilson during that acute exacerbation of Appellant's spectral PTSD and afterward; (2) Beverley D. Wilson be immediately added to Appellant's Aspyre lease agreement to ensure she had immediate access to Appellant and Appellant's Aspyre, now YOUnion, Apartment 3106 to care for him then and in the future should Appellant experience another acute exacerbation of his spectral PTSD or worsening depression; (3) Beverley D. Wilson be immediately afforded all the benefits attendant to a lessee at then Aspyre, now YOUnion Apartments, including (a) immediate provision of an electronic key to Apartment 3106, (b) immediate receipt of a fob to access entry into the Aspyre, now Younion, campus and all public areas of Aspyre, now YOUnion, accessible by that fob, (c) the right to request/demand repair services by Aspyre, now

Union, office staff and personnel for Apartment 3106 directly without having to make requests indirectly through Appellant, (4) the right to contest, negotiate, sign future contracts for Aspyre, now YOUNION, Apartment 3106 with Appellant to ensure Appellant's safety and protection legally; (5) the right to park in Aspyre, now YOUNION lessee decal designated areas upon application and receipt of such parking decal; (6) all other rights in full of a lessee as afforded in the Aspyre, now YOUNION lease agreement. The aforementioned conditions were agreed to by assistant residential manager Tiffany Maddox and have been provided since February 2018 (with the exception of timely attendance to maintenance requests for Aspyre, now YOUNION Apartment 3106 by Appellant and Beverley D. Wilson, which became timely after Appellant and Beverley D. Wilson reported same to the Court in July 2018). Beverley D. Wilson explained to Tiffany Maddox that Beverley D. Wilson would be tendering a significant portion of the funds she, Beverley D. Wilson, received from the U.S. Department of Education allotted for use exclusively by Beverley D. Wilson for her, Beverley D. Wilson's, residential abode and other expenses while in attendance at the Charleston School of Law and tendering of any such funds for any apartment for which Beverley D. Wilson, was not listed as a resident lessee would be a violation of the conditions stipulated by the U.S. Department of Education for receipt of those funds, which could render Beverley D. Wilson ineligible to receive future financial aid from the United States Department of Education, which would render Beverley D. Wilson unable to attend and graduate from law school, which Beverley D. Wilson expressed to Tiffany Maddox was a nonnegotiable event under any circumstances.

Tiffany Maddox verbalized understanding and agreement of the aforementioned conditions and promised to provide a revised lease agreement reflecting joint leasing of Aspyre, now YOUnion, Apartment 3106 by Appellant and Beverley D. Wilson, but has failed to provide a revised joint leasing agreement, despite the longstanding reasonably timely payment of rent for nearly two years, for which Beverley D. Wilson has provided half those payments, including all of January 2018 to October 2018 lease payments. Significant delays in tendering Appellant's lease payments for Aspyre, now YOUnion, Apartment, 3106 do not exist except where caused by inopportune failure of Appellant to timely receive financial aid overage from the University of South Carolina. Past owners of Aspyre waived such late fees for Appellant and other students that were beyond a student's reasonable control, particularly financial aid overage disbursed late.

Appellant asserts Ms. Maddox has provided all of the promised aforementioned conditions to grant Beverley D. Wilson status as a Co-Lessee of Aspyre, now YOUnion Apartment 3106, conditions which, by customary Usage of Trade and Course of Dealing, create an effective constructive joint lease agreement between Aspyre, now YOUnion, Apartments and Appellant and Beverley D. Wilson with all pertinent benefits. Appellant reiterates Tiffany Maddox, Aspyre, now YOUnion assistant residential manager, and Andy Walter, former Aspyre, now YOUnion manager, both informed Appellant's mother and Power of Attorney in May and June 2018, while their and Aspyre's initial attempts to eject Appellant from Aspyre were "mainly for [Appellant's] failure to pay rent timely," "but, now, it's not about the money, we just don't want him [Appellant] here," Appellant is Afro-American and was recovering from an acute

exacerbation of spectral PTSD and major depression at that juncture in time. Tiffany Maddox' and Andy Walter's verbal remarks are inflammatory, discriminatory, and violate *American Disability Act Amended Act* and *Fair Housing Act* guidelines and standards.

Appellant asserts Tiffany Maddox and Andy Walter as assistant residential manager and residential manager, respectively had a duty to include Beverley D. Wilson as an interested party and Co-Defendant in the March 2018 Eviction action, and now, as Beverley D. Wilson's interest in Aspyre, now YOUnion, Apartment 3106 coexists with Appellant's interests financially and legally.

Appellant additionally asserts that he has formally appointed and duly registered Beverley D. Wilson as his Durable and Healthcare Power of Attorney with the Richland County Courts in this matter and has given Beverley D. Wilson the express ability to represent him legally in all matters residential, financial, and otherwise, except where prohibited by law, e.g. Beverley D. Wilson may not draft and file with a court a will unilaterally on behalf of Appellant, as same must be done by Appellant himself with an attendant attorney, notary, witness. Appellant further notes his signature on court documents submitted along with that of Beverley D. Wilson as his Power of Attorney constitutes his consent for Beverley D. Wilson to represent his interests and advise him properly of his interests, as Appellant cannot represent his interests without Beverley D. Wilson's advisement. Appellant cannot afford an attorney, and does not qualify for *pro bono* legal services. Appellant additionally asserts that his past and present mental health providers have counseled Appellant and Appellant's mother that Appellant is to avoid all

undue/unnecessary mental stress to avoid a precipitation of an acute exacerbation of Appellant's spectral PTSD. Appellant asserts that representing himself would be an extreme amount of undue/unnecessary stress as Beverley D. Wilson is legitimately authorized, capable of, and has legal standing to represent Appellant's and Beverley D. Wilson's interests regarding Aspyre, now YUnion Apartment 3106 in this matter. Appellant further asserts that when he appears in court alongside Beverley D. Wilson as his Power of Attorney, Appellant continues his consents to Beverley D. Wilson for representation of his interests as noted herein. Appellant staunchly asserts that by his presence alongside Beverley D. Wilson in Court, Appellant is being represented in an official advisement capacity by Beverley D. Wilson, and for the sake of court economy regarding time, Beverley D. Wilson speaks directly to the Court on Appellant's behalf, rather than parroting advice to Appellant to address to the Court.

Finally, Appellant has no training in law and is naive to most matters pertaining to the law; Appellee's assistant residential manager Tiffany Maddox, former residential manager Andy Walter, and Appellee's attorney Thomas Howard, III, Esq., have on various occasions during this case, including hearings, not acted in good faith and/or purposefully presented false information related to Appellant, e.g. Attorney Howard's representation to South Carolina Electric and Gas (SCE&G) Appellant's electrical and water utility provider in October 2018 that Appellant had been evicted and ejected from Aspyre, now YUnion, Apartment 3106 and, therefore Apartment 3106 was available for leasing by and assignment of SCE&G utilities to South Carolina Student Housing Group, Inc. Attorney Howard's false representation to SCE&G and the attorneys for the South Carolina Student Housing Group, Inc. regarding Appellant's continued residency in

Apartment 3106 and representation of Appellee Aspyre without assenting to Appellant's and Beverley D. Wilson's requests to add Beverley D. Wilson as a duly authorized party with standing in the eviction and ejectment proceedings and continuing matters represents a fraud and continued fraud upon the Court, respectively that must be corrected by the Court immediately in the interests of justice to Appellant and Beverly D. Wilson to prevent further violations of Appellant's and Beverley D. Wilson's Constitutional rights to protect their property interests in leasing Aspyre, now YOUnion Apartment 3106.

Appellant adamantly asserts to the Court the following extenuating circumstances justifying Addition of Beverley D. Wilson as a Co-Appellant, and original Co-Defendant in the Eviction and subsequent Ejectment action by Appellee: Appellant is unskilled regarding such fraudulent, deceptive, inappropriate "sharp practices" by Ms. Maddox, Mr. Walter, and Attorney Howard, who each attempt to leverage their position illegally by utilizing false or misleading statements and unethical and illegal practices which would be difficult for Appellant to discern and respond to timely and appropriately given Appellant's lack of legal training; Appellant and Beverley D. Wilson's permanent residence at 1980 Broughton Street is no longer safe to inhabit after numerous repeated robberies over the past 12 months; and the Court's request that Beverley D. Wilson not be allowed to properly and legally represent Appellant's interests, Beverley D. Wilson's individual interests, and their joint interests with Appellant when, in fact and constructively, a legal contract including Beverley D. Wilson as a Co-Lessee with Appellant for Aspyre, now YOUnion, Apartment 3106 and Appellant has existed since February 2018 and Appellant respectfully Petitions this Court properly add Beverley D. Wilson as a Co-Appellant,

and original Co-Defendant in the Eviction and Ejectment actions by Appellee in this matter to prevent both Appellant and Beverley D. Wilson, who are graduate level students, from becoming displaced homeless individuals should they be evicted from Apartment 3106, which would most assuredly occur if Appellant is tasked with representing his and Beverley D. Wilson's legal interests in this case, given Appellant's lack of even de minimis legal knowledge and Appellant's propensity to decompensate psychologically and psychiatrically, if subjected to undue stress, and extreme stress would be present for Appellant, a legally untrained individual, in such a scenario. Appellant's and Beverley D. Wilson's extreme financial demise and student statuses with limited income earning capacity do not afford either, or both collectively, the ability to afford a licensed attorney to represent their legal interests in this matter, and Appellant asserts that previously, attorneys have mal-represented Appellant's and Appellant's mother and family's legal interests.

Appellant asserts the Court, by requiring Appellant to represent himself in this case under the circumstances as stated herein, would be an unconscionable action, a forced forfeiture of Appellant's case, and an unlawful denial of Appellant's and Beverley D. Wilson's legal interests in Aspyre, now YOUnion, Apartment 3106 in a case that is riddled with *American Disability Act Amended Act* and *Fair Housing Act* discrimination, and a myriad of Constitutional violations against Appellant and Beverley D. Wilson by Appellees and other individuals, entities yet to be enjoined in this case.

Further, Appellant asserts to the Court he desires to preserve his right to Motion the enjoining of additional Co-litigants to this complaint as Motioned previously and to be presented by future

Motions for additional Co-Litigants, e.g. Attorney Henry White and the Director of Financial Aid for the University of South Carolina, in this matter by Amendments as soon as the Court will allow. Appellant additionally Motions to the Court the right for abatement of late fees and interest where one party Appellant desires to add as a Co-Appellee/Co-Plaintiff, the University of South Carolina and its specific departments and other affiliated individuals named herein and to be enjoined in this action subsequently - are liable for late or no tendering of financial aid creating a financial hardship and inability of Appellant to timely tender lease payments in the Spring, Summer, and Fall semesters of 2018 and the Fall 2019 semester to Aspyre, now YOUNion for Apartment 3106. Appellant specifically includes for your review and consideration in this matter the October 9, 2019 letter to the University of South Carolina Board of Trustees, the October 10, 2019 letter to the University of South Carolina Appeal Committee for Title IV Tuition Refunds, and the October 31, 2019 letter to the University of South Carolina Registrar regarding Appellants AS-199 Petition for late enrollment for the Fall 2019 semester.

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Appellant also asserts to the Court he desires to preserve his rights to Motion for the addition as Co-Litigants previously mentioned assistant residential managers and residential managers of

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Aspyre/YOUNion who have openly discriminated against Appellant in this matter.

In closing, Appellant apologizes to the Court and begs the Court's forbearance of Appellant's extenuating circumstances that prevented a timely response in adherence to the December 2, 2019 Order of this Court. Appellant begs the Court's forgiveness for Excusable Neglect as stated herein and Motions the Court for Leave of Court to submit this Motion and Memorandum to Stay Respondent's *Writ of Ejectment*, Compel Respondent to Return SCE&G Utilities to

Appellant, Add Beverley D. Wilson as Co-Appellant to this Complaint, Abate lease late fees and interest, and submit the accompanying documents listed herein to the Court in response to the December 2, 2019 Order of the Court.

Respectfully submitted this 7th day of January 2020 by



Travis G. Stewart, *Pro Se* Appellant
P.O. Box 21612
Charleston, South Carolina 29413
Telephone: (803)724-7560

with the full assistance of

Beverley D. Wilson, M.D.
Power of Attorney for Appellant
P.O. Box 21612
Charleston, South Carolina 29413
Telephone: (803)724-7560

Other Counsel of Record

Thomas I. Howard, Jr.
Brownlee Whitlow & Praet, PLLC
3255 Landmark Drive, Suite 301
North Charleston, South Carolina 29418
Attorney for Respondent
Telephone: (843)628-7120
Facsimile: (843)628-0847

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