

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM FAIRFIELD COUNTY  
In The Circuit Court

Brian M. Gibbons, Circuit Court Judge

Appellate Case No. 2019-00-01956

**RECEIVED**

MAY 04 2020

S.C. SUPREME COURT

MOZELL TIMMS FORD, MARGARET GAITHER, GRACENE HAYDEN, JOHN H. HAYES, ALFRED HOLMES, SHERYL KENNEDY, DEBORAH NELSON-MOORE, PETER RICE, DOROTHY STEWART, and HASKELL TIDWELL, Sr., individually  
and on behalf of all persons similarly situated, and  
THE NEW CAMPGROUND OF CAMP WELFARE

Petitioners,

vs.

CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND,  
ROGER HALL, RACHEL MILLS, MELISSA LAMAR and any other persons acting as  
Trustees of CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND,

Respondents.

---

APPENDIX

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Rock Hill, S. C. 29731-6106  
(803) 324-8100  
Attorney for Petitioners

Other Counsel of Record:

cc: Kenneth A. Davis	Bishop Mildred H. Hines
Boykin & Davis, LLC	or Successor
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# The South Carolina Court of Appeals

Mozell Timms Ford, Margaret Gaither, Gracene Hayden, John H. Hayes, Alfred Holmes, Sherly Kennedy, Deborah Nelson-Moore, Peter Rice, Dorothy Stewart, and Haskell Tidwell, Sr., individually and on behalf of all persons similarly situated, and the New Campground of Camp Welfare, a South Carolina eleemosynary corporation, Appellants,

v.

Camp Welfare A.M.E. Zion Church and Campground, a South Carolina eleemosynary corporation, Roger Hall, Rachel Mills, Melissa Lamar and any other persons acting as Trustees of Camp Welfare A.M.E. Zion Church and Camp, Respondents.


Appellate Case No. 2019-001956

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## ORDER

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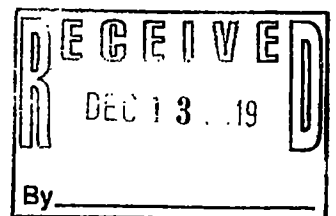
This appeal arises out of an order of the circuit court denying a motion to compel discovery. "[O]rdinarily, an order denying or compelling discovery is not directly appealable." *Lowndes Prod., Inc. v. Brower*, 262 S.C. 431, 433, 205 S.E.2d 184, 185 (1974). Accordingly, this appeal is dismissed. The remittitur will be sent pursuant to Rule 221(b) of the South Carolina Appellate Court Rules.

  
\_\_\_\_\_, J.  
FOR THE COURT

Columbia, South Carolina  
cc:  
John Martin Foster, Esquire  
Kenneth Allen Davis, Esquire  
Tierney Felicia Dukes, Esquire

**FILED**

Dec. 11, 2019



# The South Carolina Court of Appeals

Mozell Timms Ford, Margaret Gaither, Gracene Hayden, John H. Hayes, Alfred Holmes, Sherly Kennedy, Deborah Nelson-Moore, Peter Rice, Dorothy Stewart, and Haskell Tidwell, Sr., individually and on behalf of all persons similarly situated, and the New Campground of Camp Welfare, a South Carolina eleemosynary corporation, Appellants,

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Appellate Case No. 2019-001956

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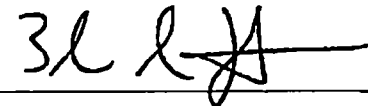
## ORDER

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After careful consideration of the petition for rehearing, the Court is unable to discover that any material fact or principle of law has been either overlooked or disregarded, and hence, there is no basis for granting a rehearing. Accordingly, the petition for rehearing is denied.

  
\_\_\_\_\_ J.

  
\_\_\_\_\_ J.

  
\_\_\_\_\_ J.

**FILED**

April 3, 2020

Columbia, South Carolina

cc:

John Martin Foster, Esquire

Kenneth Allen Davis, Esquire

Tierney Felicia Dukes, Esquire

Judy Bonds

FORM 4

STATE OF SOUTH CAROLINA  
COUNTY OF Fairfield  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2016CP2000294

Members Of Camp Welfare  
PLAINTIFF(S)

Amez Church And Camp Welfare Church Trustees  
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  
 Other
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED:  See attached order (formal order to follow)  Statement of Judgment by the Court:

Plaintiffs motion to compel is respectfully denied.

ORDER INFORMATION

This order  ends  does not end the case.  See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 10/23/2019 .

C. Pinckney Roberts

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NOV 25 2019

SC Court of Appeals

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

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NOV 29 2019  
By \_\_\_\_\_

ELECTRONICALLY FILED - 2019 Oct 23 9:04 AM - FAIRFIELD - COMMON PLEAS - CASE#2016CP2000294

**Court Reporter:**

**E-Filing Note:** The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

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Fairfield Common Pleas

**Case Caption:** Members Of Camp Welfare VS Amez Church And Camp Welfare  
Church Trustees  
**Case Number:** 2016CP2000294  
**Type:** Order/Electronic Form 4

So Ordered

s/Brian M. Gibbons #2168 Circuit Judge

Electronically signed on 2019-10-23 07:00:21 page 3 of 3

ELECTRONICALLY FILED - 2019 Oct 23 9:04 AM - FAIRFIELD - COMMON PLEAS - CASE#2016CP2000294

STATE OF SOUTH CAROLINA  
COUNTY OF Fairfield  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2016CP2000294

Members Of Camp Welfare  
PLAINTIFF(S)

Amez Church And Camp Welfare Church Trustees  
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NOV 25 2019

SC Court of Appeals

**DISPOSITION TYPE (CHECK ONE)**

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- ACTION STRICKEN** (CHECK REASON)  Rule 40(j), SCRCP;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT** (CHECK APPLICABLE BOX)  
 Affirmed;  Reversed;  Remanded;  
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

**IT IS ORDERED AND ADJUDGED:**  See attached order (formal order to follow)  Statement of Judgment by the Court:

Motion to Alter/Amend Judgment Denied. No hearing necessary.

**ORDER INFORMATION**

This order  ends  does not end the case.

See Page 2 for additional information.

**For Clerk of Court Office Use Only**

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 11/05/2019 .

C. Pinckney Roberts

**RECEIVED**  
NOV 29 2019  
By \_\_\_\_\_

**NAMES OF TRADITIONAL FILERS SERVED BY MAIL**

**Court Reporter:**

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**RECEIVED**

**NOV 25 2019**

**SC Court of Appeals**

**Fairfield Common Pleas**

**Case Caption:** Members Of Camp Welfare VS Amez Church And Camp Welfare  
Church Trustees  
**Case Number:** 2016CP2000294  
**Type:** Order/Electronic Form 4

So Ordered

s/Brian M. Gibbons #2168 Circuit Judge

Electronically signed on 2019-11-05 10:23:05 page 3 of 3

ELECTRONICALLY FILED - 2019 Nov 05 10:33 AM - FAIRFIELD - COMMON PLEAS - CASE#2016CP2000294

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM FAIRFIELD COUNTY  
In The Circuit Court

Brian M. Gibbons, Circuit Court Judge

Case No. 2016-CP-20-00294

**RECEIVED**

NOV 25 2019

SC Court of Appeals

MOZELL TIMMS FORD, MARGARET GAITHER, GRACENE HAYDEN, JOHN H. HAYES, ALFRED HOLMES, SHERYL KENNEDY, DEBORAH NELSON-MOORE, PETER RICE, DOROTHY STEWART, and HASKELL TIDWELL, Sr., individually and on behalf of all persons similarly situated, and THE NEW CAMPGROUND OF CAMP WELFARE

Appellants,

vs.

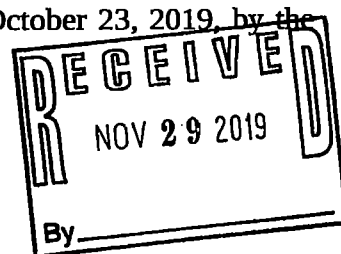
CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND, ROGER HALL, RACHEL MILLS, MELISSA LAMAR and any other persons acting as Trustees of CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND,

Respondents.

NOTICE OF APPEAL

The above-named MOZELL TIMMS FORD, MARGARET GAITHER, GRACENE HAYDEN, JOHN H. HAYES, ALFRED HOLMES, SHERYL KENNEDY, DEBORAH NELSON-MOORE, PETER RICE, DOROTHY STEWART, and HASKELL TIDWELL, Sr., individually and on behalf of all persons similarly situated, and THE NEW CAMPGROUND OF CAMP WELFARE, appeal the following orders:

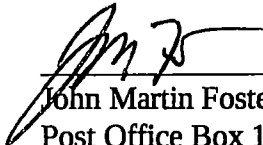
Order denying thre Plaintiff's Motion to Compel filed October 23, 2019, by the  
Honorable Brian M. Gibbons;



Order Denying Defendant's Rule 59 Motion to Alter or Amend, filed November 5, 2019, by the Honorable Brian M. Gibbons.

Appellants received electronic notice of the entry of the final Order listed above on the date of filing.

November 22, 2019

  
\_\_\_\_\_  
John Martin Foster  
Post Office Box 106  
Rock Hill, S.C. 29731-6106  
803 324-8100  
Attorney for Appellants

Other Counsel of Record:

Kenneth A. Davis  
Tierney F. Dukes  
Attorneys for Defendants  
Post Office Box 11844  
Columbia, S.C. 29211  
803 254-0707

Bishop Mildred H. Hines  
or Successor  
South Atlantic Episcopal District  
745 Saluda Street  
Rock Hill, S.C. 29730

Keeper of Records  
A.M.E. Zion Headquarters  
3225 Sugar Creek Road  
Charlotte, N.C. 28269

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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NOV 25 2019

SC Court of Appeals

Case No. 2016-CP-20-00294

MOZELL TIMMS FORD, MARGARET GAITHER, GRACENE HAYDEN, JOHN H. HAYES, ALFRED HOLMES, SHERYL KENNEDY, DEBORAH NELSON-MOORE, PETER RICE, DOROTHY STEWART, and HASKELL TIDWELL, Sr., individually and on behalf of all persons similarly situated, and THE NEW CAMPGROUND OF CAMP WELFARE

Appellants,

vs.

CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND, ROGER HALL, RACHEL MILLS, MELISSA LAMAR and any other persons acting as Trustees of CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND,

Respondents.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal, with copies of the Orders on appeal, dated November 22, 2019, on the following counsel or persons of record:

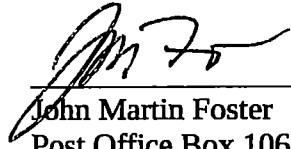
Kenneth A. Davis  
Tierney F. Dukes  
Attorneys for Defendants  
Post Office Box 11844  
Columbia, S.C. 29211  
803 254-0707

Bishop Mildred H. Hines or Successor  
South Atlantic Episcopal District  
745 Saluda Street  
Rock Hill, S.C. 29730

Keeper of Records  
A.M.E. Zion Headquarters  
3225 Sugar Creek Road  
Charlotte, N.C. 28269

by depositing the same with the United States mail, with sufficient first class postage attached, properly addressed to the clerk of the Court, and with a copy also directed to the respective last known address(es) of those attorney(s) and/or persons set out above, pursuant to Rule 262(b), S.C.A.C.R.

November 22, 2019



---

John Martin Foster  
Post Office Box 106  
Rock Hill, S. C. 29731-6106  
803 324-8100  
Attorney for Appellant

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM FAIRFIELD COUNTY  
In The Circuit Court

Brian M. Gibbons, Circuit Court Judge

Appellate Case No. 2019-00-01956

**RECEIVED**  
DEC 19 2019  
SC Court of Appeals

MOZELL TIMMS FORD, MARGARET GAITHER, GRACENE HAYDEN, JOHN H. HAYES, ALFRED HOLMES, SHERYL KENNEDY, DEBORAH NELSON-MOORE, PETER RICE, DOROTHY STEWART, and HASKELL TIDWELL, Sr., individually  
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THE NEW CAMPGROUND OF CAMP WELFARE

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ROGER HALL, RACHEL MILLS, MELISSA LAMAR and any other persons acting as  
Trustees of CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND,

Respondents.

PETITION FOR REHEARING

**RECEIVED**  
DEC 26 2019  
By \_\_\_\_\_

The Appellants as Petitioners petition for a rehearing of the matter above under Rules 221(a) and 224, S.C.A.C.R. The Appellants petition for a rehearing of the matter above under Rules 221(a), S.C.A.C.R.

This Appeal is from Orders of the Circuit Court denying discovery in the above case. The Appeal was dismissed by Order of the Court filed December 11, 2019.

That Order cites the holding in *Lowndes Products, Inc. v. Browder*, 262 S.C. 431, 433, 205 S.E.2d 184, 185 (1974) that “ordinarily, an order denying or compelling discovery is not directly appealable.” That holding cites the language of S.C. Code § 14-3-330 (the former Code Section 15-123) which states, in relevant part:

The Supreme Court shall have appellate jurisdiction for correction of errors of law in law cases, and shall review upon appeal:

(1) Any intermediate judgment, order or decree in a law case involving the merits in actions commenced in the court of common pleas and general sessions, brought there by original process or removed there from any inferior court or jurisdiction, . . .

(2) An order affecting a substantial right made in an action when such order (a) in effect determines the action and prevents a judgment from which an appeal might be taken or discontinues the action, (b) grants or refuses a new trial or (c) strikes out an answer or any part thereof or any pleading in any action;

[*Emphasis added.*]

This limitation on review of intermediate orders was stated and clarified by the Supreme Court in *Lowndes, supra*:

The order denying discovery only determined what evidence might be elicited upon the pretrial examination of the defendant and does not have the effect of determining the scope of the issues at the trial.

[*Id.*, 262 S.C. 433 - 434, 205 S.E.2d 185; *emphasis added.*]

The holding of the Supreme Court in *EX PARTE Wilson*, 625 S.E.2d 205, 367 S.C. 7 (2005) is also on point:

Intermediate orders involving the merits may be immediately appealed pursuant to § 14-3-330(1). An order which involves the merits is one that "must finally determine some substantial matter forming the whole or a part of some cause of action or defense." *Mid-State Distributions, Inc.*, 310 S.C. at 334, 426 S.E.2d at 780. Interlocutory orders affecting a substantial right may be immediately appealed pursuant to § 14-3-330(2). Orders affecting a substantial right "discontinue an action, prevent an appeal, grant or refuse a new trial, or strike out an action or defense." *Id.* at 335 n. 4, 426 S.E.2d at 780 n. 4.

This action arises from the Respondents' assertion of control over the direction and finances of a yearly gathering at the Camp Welfare campground in Fairfield County. This gathering is now over some hundred and forty years old and involves the descendants of the original campers, some hundreds in number. The nine current members of the Camp Welfare A.M.E.

Zion Church on whose land the gathering takes place assert their total control of the gathering and its finances and claim immunity from any inquiry or disclosure by reason of their status as a church.

By the account in the WPA record of 1936, control lies in trustees selected by the full body of the campers. A copy of that record is attached and incorporated.

The Appellants contend that discovery can produce evidence that the local church and the A.M.E. Zion denomination have known of, and acceded in, the control of the gathering and its finances by the full body of the campers. They also contend that the local church and the A.M.E. Zion denomination were aware of the conversion of funds from the gathering to private individuals.

The Respondents' defenses rely upon their status as a church, and upon their compliance with the discipline of the A.M.E. Zion denomination.

In this appeal, the discovery denied involves the merits of the case and has the effect of determining the scope of issues to be tried. By denying the Appellants the discovery sought, it effectively determines the substantial question of the involvement and/or acquiescence of the A.M.E. Zion Church in the practices of the local church. Such denial also effectively prevents a determination of the conversion of funds from the gatherings and of the Respondents' claim to be protected by their adherence to church discipline.

Thus the general holding of *Lowndes* dismissing intermediate appeals on discovery cannot be applied.

In the absence of full discovery on this issue, the Plaintiffs cannot present their case. In the absence of full discovery, the issues to be tried will be severely limited or effectively barred.

The Appellants set forth below the history of this matter:

#### History and Argument as to Discovery requested

1. The Appellants' *Subpoena* to the South Atlantic Episcopal District of the African Methodist Episcopal Church was dated April 25<sup>th</sup>, 2017.
2. The documents sought by the *Subpoena* to the African Methodist Episcopal Church were stated as:

Any and all documents or communications relating to or regarding any records of the existence, incorporation, record-keeping, finances and operation of A.M.E.Z CHURCH

AND CAMP and/or CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND, a South Carolina eleemosynary corporation during the relevant period.

3. The Appellants' *Subpoena* to Roger R. Hall on behalf of A.M.E.Z Church and Camp Welfare Trustees was dated February 22<sup>nd</sup>, 2017 and mailed to opposing counsel on February 28<sup>th</sup>, 2017. That *Subpoena* sought documents in the same term as quoted above.
4. The Respondents made no objection to the *Subpoena* at the Deposition of Roger Hall on March 31, 2017, which was set as the deadline for production under that said *Subpoena*.
5. The Appellants' Request for Production of Documents was served by mail and e-mail dated May 13<sup>th</sup>, 2019.

#### Motion to Quash

6. In response to the *Subpoena* to Hall, the Respondents filed a Motion to Quash. That Motion to Quash was based, *inter alia*, upon over-breadth of the request.'
7. During the period leading up to argument, counsel for the Appellants was told by counsel for the Respondents of his position was that the caption joined the full A.M.E. Zion Church.

#### Order to Compel and Response

8. By its Order filed September 12<sup>th</sup>, 2018, after a hearing on the Motions to Quash and to Enforce the *Subpoena* to Hall, the Court compelled discovery of those items listed on the *Subpoena* to Mr. Hall as representative of the Defendant A.M.E. Zion Church and Camp Welfare Trustees. A copy of that Order is attached hereto and incorporated herein.
9. By letter with attachments dated October 2<sup>nd</sup>, 2018, the Respondents purported to comply with the Order to Compel. The said letter does not claim to have held any documents back. It stated, in relevant part, that the documents included those "in possession of Camp Welfare A.M.E. Zion Church detailing the finances and operation of its annual revival and camp meeting."
10. To the extent the documents supplied with the Respondents' letter of October 2<sup>nd</sup> do not respond to the those demanded by the *Subpoena* to Hall and required by the Order to compel, the Respondents are in contempt of that Order.

Status of Discovery supplied by Camp Welfare

11. On May 3<sup>rd</sup>, 2019, the Appellants took the Deposition of Rachel Hall Mills, identified as a Rule 30(b)(6) representative of Camp Welfare Church. In that Deposition, the following exchanges occurred:

·5· ····· Ma'am, I believe I'm accurately characterizing  
·6· ·the testimony we had from Mr. Hall as indicating that  
·7· ·reports from Camp Welfare as to their finances, and  
·8· ·otherwise as required by the Book of Discipline, had been  
·9· ·filed with the A.M.E. Zion bishop and the -- what I would  
10· ·call, I guess, the authorities above the church itself.

11· ·Is that your understanding, ma'am?

12· ····A· ·Yes.

13· ····Q· ·Okay· Who has possession of those documents,  
14· ·ma'am?

15· ····A· ·They are either at the church, or -- and I have  
16· ·copies.

17· ····Q· ·Okay· Well, ma'am, we have in this case already  
18· ·had a subpoena and order to turn over records as to  
19· ·finances in this church· We do not have those documents.  
20· ·I realize, ma'am, you are not a lawyer· Is there any  
21· ·reason why you can tell me why we do not have those  
22· ·documents?

23· ····A· ·Which ones did you not get?

24· ····Q· ·The reports to the church, ma'am, the higher  
25· ·church.

·A· ·I don't understand the question· You got the  
·2· ·bank statements, the receipts.

·3· ····Q· ·No, ma'am· I'm talking about the reports from  
·4· ·Camp Welfare Church to the bishop and to what I believe is  
·5· ·called the "general conference."

·6· ····A· ·Um-hmm.

·7· ····Q· ·I understood your testimony to be that those had

·8· ·been -- they exist and they were in the keeping of the  
·9· ·church. · Am I misstating your statement, ma'am?  
10· · · ·A. · Oh, yeah. · No. · We do not give an actual written  
11· ·report to the bishop. · The pastor sits in all the meetings  
12· ·at the final end of the camp meeting to go over what's  
13· ·raised, what's paid out. · That's the documentation for the  
14· ·church. · If he's okay with it, that's the end of it. · The  
15· ·bishop, to my knowledge, never asks him -- you may have to  
16· ·ask him if she asked him for any more information.  
17· · · ·Q. · So, ma'am, if I understand your testimony, there  
18· ·is no such thing as a written report from Camp Welfare  
19· ·Church to the conference or to the bishop?  
20· · · ·A. · Not that I'm aware of, no.  
21· · · ·Q. · Not anymore?  
22· · · ·A. · Not that I'm aware of, no.  
23· · · ·Q. · Ma'am, I have to ask you, since you've been  
24· ·designated as a 30(b)(6) witness, who would know, if not  
25· ·you, whether such things exist?  
·1· · · ·A. · No one else.

[DEPOSITION OF RACHEL HALL MILLS, May 3, 2019, pp. 6-8.]

·8· · · · Ma'am, a contribution is sent by Camp Welfare to  
·9· ·what I call the conference or the bishop.  
10· · · ·A. · What's the question?  
11· · · ·Q. · Are any monies donated or given to Camp Welfare  
12· ·since -- to the bishop or what I call the conference, the  
13· ·larger church above you?  
14· · · ·A. · From the church, yes.  
15· · · ·Q. · And those are sent in what form? · A check?  
16· · · ·A. · Yes.  
17· · · ·Q. · With no report?  
18· · · ·A. · Yes. · We report those, like, for the different  
19· ·auxiliaries, like the trustee board, the steward board,  
20· ·the Ministry of Kindness. · They all have to do a report

21· ·quarterly, and then they do one at the end, at the annual

22· ·conference, for the annual.

23· ··Q· ·And who has those reports, ma'am?

24· ··A· ·They turn them in to the bishop, to the A.M.E.

25· ·Zion Conference.

·Q· ·Do you-all keep copies?

·2· ··A· ·Yes.

·3· ··Q· ·Do you have those copies?

·4· ··A· ·They should be at the church, or the pastor has

·5· ·them, one or the other.

·6· ··Q· ·One or the other?

·7· ··A· ·Um-hmm.

·8· ··Q· ·Are you aware, ma'am -- and I'm not trying to be

·9· ·combative with you -- why we haven't been given copies of

10· ·them?

11· ··A· ·I have no idea.

[DEPOSITION OF RACHEL HALL MILLS, May 3, 2109, pp. 17-18.]

### Objection of the Respondents and argument

12.In its objection to the Appellants' Request for Production, the Respondents stated as follows:

Defendants object to this request as the term "subject transaction" is broad in that Plaintiffs have requested copies of all documents and correspondence regarding Camp Welfare A.M.E. Zion Church, the A.M.E. Zion Church, Inc., a hierarchical denomination, its episcopal districts, bishops, officers, and other representatives from January 1, 1863 to present. As drafted, such request is unduly burdensome as responding to this request would require an unreasonable amount of time and resources to fulfill in relation to the needs of the case as it would require Respondents to search, review, and produce all records since the Church's inception. Respondents further object to this request as it seeks records of persons not a party to this action, to include, conference reports, financial records, and other documents of the A.M.E. Zion Church, Inc., its episcopal districts, bishops, officers, and other representatives.

13. Insofar as the documents sought are adequately described in the *Subpoena* served on Hall, enforced by Order of this Court, and again in Appellants' Request for Production of Documents, the argument as to over-breadth is moot.
14. Insofar as the documents sought are adequately described in the *Subpoena* served on the A.M.E. Zion Church, and again in Appellants' Request for Production of Documents, the request is not overbroad.
15. As of this time, the Appellants' suit involves two main issues: a) the Appellants' continuing right to peacefully and direct the Campground during the August gathering, and b) an accounting for funds paid for upkeep and improvement on the Campground property.
16. The issue of Campground finances are specifically referenced in Paragraph 3. of the Appellants' Motion for Temporary Restraining Order filed August 16, 2016, and in Paragraphs 14. through 18., and 24. through 40. of their Amended Complaint filed March 1, 2018.
17. The scope of discovery is stated in Rule 26(b)(1), S.C.R.C.P. as follows:

**(b) Scope of Discovery.** Unless otherwise limited by order of the court in accordance with these rules, the scope of discovery is as follows:

**(1) In General.** Parties may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party, including the existence, description, nature, custody, condition and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of any discoverable matter. It is not ground for objection that the information sought will be inadmissible at the trial if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

18. The documents sought are, by definition, relevant to the issues stated in the pleading. They cannot be defined as overbroad.
19. To the extent required by the Court, the Appellants stand ready to enter into a Protection Order in common form as to any documents provided.

20. To the extent the documents sought are extensive, the Appellants stand ready to provide an independent researcher to search the records of the African Methodist Episcopal Church.
21. To the extent the discovery of materials is limited by the alleged non-joinder of the full African Methodist Episcopal Church and such joinder is required to effect discovery, the Appellants moved that the same be joined in this action by operation of Rules 18 and 19, S.C.R.C.P.

#### Current Status of Discovery

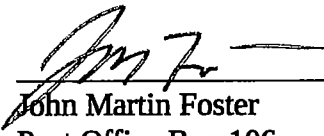
22. By their Motion to Compel filed July 23<sup>rd</sup>, 2019, the Appellants sought an Order to compel Discovery and/or compliance with its Subpoena to the African Methodist Episcopal Church, an award of attorneys' fees and costs incurred as a result of this Motion and, as proven, an Order holding the Respondents in contempt for failure to comply with the Order to compel filed September 12<sup>th</sup>, 2018.
23. The Appellants' Motion was heard October 17<sup>th</sup>, 2019. By its Order of October 23<sup>rd</sup>, 2019, this Court denied the Plaintiffs' Motion without comment.
24. The Appellants' Rule 59 Motion was filed November 1, 2019. By its Order of November 5, 2019, this Court denied the Plaintiffs' Rule 59 Motion without comment.
25. In the absence of Findings of Fact or Conclusions of Law in the Circuit Courts' Orders, the Appellants are without guidance as to their right to future discovery, or as to the grounds for the Court's refusal of relief.
26. There is no Scheduling Order in place in this civil action under whose terms the relief sought is untimely.
27. There is no indication in the appealed Circuit Courts' Orders that the discovery sought by Appellants is overbroad.
28. There is no indication in the appealed Circuit Courts' Orders that the discovery sought by the Appellants cannot be used to support its claims.
29. The Appeal herein was filed by Notice dated and served by mailing of November 22, 2019.

#### Conclusion

For all the reasons set out and referenced herein, the Appellants as Petitioners request that this matter be reheard by the Court of Appeals, that the Order of December 11, 2019 be

reversed, that this appeal proceed to Briefs and argument, and for any other relief to which they may be entitled in law or equity.

Respectfully submitted,

  
\_\_\_\_\_  
John Martin Foster  
Post Office Box 106  
Rock Hill, S.C.29731-6106  
Attorney for Petitioner/Appellants

December 17, 2019

Rock Hill, South Carolina

Project 2035  
James H. Smith  
Montgomery County

no. words

page ....

CAMP WELFARE

located in Sevier County on the waters of the ...  
... part of the old plantation owned many years ago by J. H.  
... and known as the ... a peculiar custom or re-  
... ceremony that began sixty-three years ago is still being  
... .

The slaves had been emancipated and the next thing they wanted  
... church of their own. One Charles Hill, a negro, who  
... this place wrote to the old rich church in New York, asking  
... to send a minister to select a site for a church and preach  
... the community. Elder Moore, a presiding elder of the ...  
... James H. Jackson, the minister who was to be in charge of the  
... church, James Garner, Charles Hill, and Wiley Johnson, began  
... looking around for a suitable place--night caught them in the wood-  
... hills and they decided to spend the sleeping on the ground. On  
... rising, the elder asked the men how they rested to which question  
... they all answered, "well". It was from this incident that the place  
... its name "Camp Welfare".

These men purchased eleven and one half acres. They still  
... have in their possession the original deed made out the 19th of  
... August 1876.

The first structure for worship was a brush arbor, made of logs  
... and covered with dried brush built on the top of a hill, but after  
... finding this location too windy they moved to the valley below and  
... built another brush arbor. This was replaced ten years later by a

roughly constructed open shelters, covered with bark boards that  
are being used at the present time.

The people of this community and many from practically every  
state in the area make pilgrimages annually to Camp Wellers, as  
the people of this area are called, and there they live in the three  
hundred or more crudely constructed cabins for one week.

These preaching services are held daily, with four on Sunday.

Only the camp is owned by the W. M. S. Church the servi-  
ces are non-denominational. Any one wishing may remain the week  
of a family, there free of charge. They must however, furnish their  
own food and bedding.

The grounds and buildings are kept up by a trustee board of  
nine men, elected every year by the people.

The crowds attending these camp meetings have been estimated  
at between ten and five thousands.

References

Interview:

Lawrence Gibson--age 79--one of the original purchasers of  
the land. Wingersboro, South Carolina, N. C. D.

Interview:

Lawrence Hall, one of the first members--and chairman of the  
present board of trustees, Wingersboro, South Carolina, N. C. D.

STATE OF SOUTH CAROLINA ]  
COUNTY OF FAIRFIELD ]

IN THE CIRCUIT COURT  
SIXTH JUDICIAL CIRCUIT

MOZELL TIMMS FORD, ]  
MARGARET GAITHER, ]  
GRACENE HAYDEN, ]  
JOHN H. HAYES, ]  
ALFRED HOLMES, ]  
SHERYL KENNEDY, ]  
DEBORAH NELSON-MOORE, ]  
PETER RICE, ]  
DOROTHY STEWART, and ]  
HASKELL TIDWELL, Sr., ]  
individually and on behalf of all persons ]  
similarly situated, and ]  
THE NEW CAMPGROUND OF ]  
CAMP WELFARE, a South Carolina ]  
eleemosynary corporation, ]

ORDER  
ON MOTIONS

C.A. No. 2016-CP-20-00294

Plaintiffs,

vs.

CAMP WELFARE A.M.E. ZION ]  
CHURCH AND CAMP GROUND, a ]  
South Carolina eleemosynary corporation, ]  
ROGER HALL, ]  
RACHEL MILLS, ]  
MELISSA LAMAR and ]  
any other persons acting as Trustees of ]  
CAMP WELFARE A.M.E. ZION ]  
CHURCH AND CAMP, ]

Defendants.

The Motions of the parties came on for hearing September 6, 2018 at 9:30 A.M. Kenneth A. Davis of Boykin & Davis, LLC appeared for the Defendants; John Martin Foster for the Plaintiffs. The Defendants move to dismiss under Rule 12(b)(1) and 12(b)(6), S.C.R.C.P., and to quash the Plaintiff's Subpoena. The Plaintiffs oppose and move to compel compliance with their subpoena.

Camp Welfare is a campground site under a deed to the local A.M.E. Zion Church. A yearly retreat on the site is held by the Plaintiffs and others in their position, who are alleged to be descendants of the original founders of the site and holders of "tents" or wooden structures occupied by the Plaintiffs during the August retreat.

In 2016, a dispute arose between the Plaintiffs and the named Defendants. The Plaintiffs sought financial information as to their camp fees and site maintenance.

This matter was referred to mediation by this Court. No settlement has resulted.

#### DEFENDANTS' MOTION TO DISMISS

The Defendants argue that they are entitled to a dismissal of this action. They argue that the Camp Welfare Church is a part of the A.M.E. Zion Church, a hierarchical entity, and that the ownership and management of the site are within the sole provenance of Church discipline. As such, they assert this Court is without jurisdiction to hear this matter.

The Plaintiffs contend they have a recognized right to participation in the August meetings, in the use of their "tents" and in the management of the campsite.

Our Courts have recognized that an ecclesiastical entity is subject to the laws dealing with real estate. *Protestant Episcopal Church in the Diocese of S.C. ET AL. v. The Episcopal Church ET AL.*, App., 421 S.C. 211, 806 S.E.2d 82 (2017).

The evidence before the Court at this time is:

the deeds of the real property into the Camp Welfare A.M.E. Zion Church;  
the WPA Project report, dated 1936-1937;  
the verified Amended Complaint; and  
the Deposition of Rogers Hall taken March 31, 2017.

The 3<sup>rd</sup> and 4<sup>th</sup> full paragraphs of the WPA Project report on Page 2 of that document state:

While the camp is owned by the A. M. E. Z. church the services are non-denominational. Any one wishing may spend the week of worship there free of charge. They must however, furnish their own food and bedding.

The grounds and buildings are kept by a trustee board of nine men, elected every year by the people.

Rogers Hall, Chairman of the Trustees, was deposed on March 31, 2017. In relevant part, Mr. Hall acknowledged that Trustees come from other churches, even from non-A.M.E. Zion churches. He stated:

25. Q. So, sir, if I understand your testimony,  
1. there was a time when these trustees were supplied

2. outside the A.M.E. Zion Church?
3. A. Yes.
4. Q. Okay, sir. When did that change; to your
5. knowledge?
6. A. At the decease of those that I mentioned.
7. Q. And you can -- I'm not asking you to say
8. anything you don't know, sir. Do you have any idea
9. of when that would have been?
10. A. No.
11. Q. Okay. Was there a change in the written
12. rules about who was going to be a trustee, sir?
13. A. No.
14. Q. Okay, sir. So it's never been written down
15. as to why this change or when this change occurred?
16. A. No, we still practice it, but we send out
17. invitations for the churches to come and help out,
18. but no one was willing to come and work diligently.
19. Some would come, but they would fall off to the
20. wayside, so we couldn't make them come.
21. Q. So specifically, sir, you asked some of
22. these churches to supply trustees?
23. A. That's correct.

[Hall Deposition, p. 21-22; page numbers as indicated.]

21. Q. Okay, sir. Sir, was there a vote taken to
22. change this? By that, I mean a vote of the Board of
23. Trustees.
24. A. No, it hasn't been changed.
25. Q. Okay, it hasn't been changed. Since

1. roughly 2010, sir, have any trustees or officers,
2. I'll call them, been terminated from or suspended or
3. expelled from that position?

4. A. No.  
5. Q. Okay, sir. Since roughly 2010, have any  
6. members or persons been terminated, expelled, or  
7. suspended from Camp Welfare?  
8. A. No.

[Hall Deposition, pp. 23–24; page numbers as indicated.]

Both Counsel acknowledged in argument that the manual entitled THE DOCTRINE AND DISCIPLINE OF THE A.M.E. ZION CHURCH is the governing document of that Church, and that this manual makes no provision for Trustees outside the local church.

In light of the evidence, there exists a genuine issue of disputed material fact regarding the management and control of the campground, which constitutes a dispute over that property and which precludes any conclusion that this Court is without jurisdiction to hear this matter. *Protestant Episcopal Church in the Diocese of S.C. ET AL. v. The Episcopal Church ET AL.*, App., Acting Justice Toal concurring, 421 S.C. 271, 806 S.E.2d 114 (2017); *Boyd v. Smyzer*, No. 2009-CA-00126-MR, pg. 6 (Ky.App. 6/11/2010).

As to the Defendant’s Motion under Rule 12(b)(6), S.C.R.C.P., such relief can only be granted where the pleadings are so defective that, taking all the facts alleged in the pleading as admitted, no cause of action is stated. A judgment on the pleadings is not proper if there is an issue of fact raised by the Amended Complaint which, if resolved in favor of the Plaintiffs, would entitle them to judgment. *See, e.g., Lydia v. Horton*, 343 S.C. 376, 540 S.E.2d 102 (Ct.App. 2000). Given the facts in dispute as recited in the pleadings, the Defendants are not entitled to such relief.

#### MOTIONS TO QUASH and TO COMPEL

Plaintiffs’ Subpoena was dated and mailed February 28th, 2017. It requested:

Any and all documents or communications relating to or regarding any records of the existence, incorporation, record-keeping, finances and operation of AMEZ CHURCH AND CAMP and/or CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND, a South Carolina eleemosynary corporation during the relevant period.<sup>1</sup>

---

<sup>1</sup> The Definition of terms attached to the Subpoena are omitted; the “relevant period” was defined in the Subpoena as being from January 1, 2010.

The Defendants made no objection to the Subpoena at the Deposition of Roger Hall on March 31, 2017, which was set as the deadline for production under the Subpoena.

On Monday, April 24<sup>th</sup>, 2017, counsel for Plaintiffs received the Defendants' Motion to Quash the Subpoena. A second Motion, to the same effect, was received on June 12, 2017.

The Defendants' Motions to Quash argue, first, the request of the subpoena is overbroad, second, the undue burden of expense entailed in compliance, and third, the relevance of such discovery.<sup>2</sup>

The Plaintiffs' suit involves: a) the Plaintiff's continuing right to peacefully use the Campground during the August gathering, and b) an accounting for funds paid for upkeep and improvement on the Campground property. The issue of campground finances are specifically referenced in Paragraphs 14. through 18., and 24. through 40. of their Amended Complaint.

The financial and corporate documentation sought are directly relevant to the issues cited above. The scope of discovery is stated in Rule 26(b)(1), S.C.R.C.P.:

**(b) Scope of Discovery.** Unless otherwise limited by order of the court in accordance with these rules, the scope of discovery is as follows:

(1) **In General.** Parties may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party, including the existence, description, nature, custody, condition and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of any discoverable matter. It is not ground for objection that the information sought will be inadmissible at the trial if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

The documents sought are, by definition, relevant to the issues stated in the pleading. They cannot be said to be overbroad.

The Defendants' position on the relevance of discovery is not borne out by precedent. *See, e.g., Padron v. Watchtower Bible & Tract Soc'y of N.Y., Inc.* (Cal. App., 2017); *Pardue v. Center City Consortium Schools*, 875 A.2d 669 (DC, 2005); *Napierski v. Unity Church*, 802 A.2d 391, 2002 ME 108 (Me., 2002); *Hadnot v. Shaw*, 826 P.2d 978, 1992 OK 21 (Okla., 1992); *Diocese of Galveston-Houston v. Stone*, 892 S.W.2d 169 (Tex.App.-Hous. (14 Dist.) 1994). The cited precedent holds

<sup>2</sup> The original Motion to Quash also argued the then-pending Mediation as a ground; that mediation, as recited, has now occurred. The second Motion to Quash also advances the arguments on jurisdiction dealt with above.

discovery proper if the Court must determine whether the issue is one of neutral law cognizable to the Court; and discovery is also proper when the issue is one of neutral law cognizable to the Court.

The Plaintiffs' action relates to the management as well as the ownership of the real property in question. On their face, those issues involve only neutral questions of law, not matters of "discipline, or of faith, or ecclesiastical rule, custom, or law" in the language of *All Saints Parish v. Episcopal Church*, 685 S.E.2d 163, 385 S.C. 428 (2009).

No factual showing has been made of any inordinate expense involved in the production of the documents listed in the Plaintiffs' Subpoena.

The Defendants have shown no basis to prevent normal discovery. The Plaintiffs are entitled to discovery and to compliance with their Subpoena of February 28<sup>th</sup>, 2017.

NOW, THEREFORE, IT IS ORDERED:

That the Defendants' Motions to Dismiss under Rule 12(b)(1) and 12(b)(6), S.C.R.C.P. are DENIED;

That in accordance with Rule 12(a)(1), S.C.R.C.P., the Defendants shall serve their responsive pleading to the Amended Complaint within fifteen (15) days after notice of the Court's action;

That the Defendants' Motions to Quash the Subpoena of February 28<sup>th</sup>, 2017 are DENIED;

That the Plaintiff's Motion to Compel compliance with the Subpoena of February 28<sup>th</sup>, 2017 is GRANTED; and

That the Defendants shall comply with the Subpoena of February 28<sup>th</sup>, 2017 within twenty (20) days after notice of the Court's action;

AND IT IS SO ORDERED.

---

John C. Hayes  
Acting Circuit Judge  
Sixth Judicial Circuit

September \_\_\_\_, 2018

Rock Hill, South Carolina

ELECTRONICALLY FILED - 2018 Sep 12 10:51 AM - FAIRFIELD - COMMON PLEAS - CASE#2016CP2000294



Fairfield Common Pleas

**Case Caption:** Members Of Camp Welfare VS Amez Church And Camp Welfare Church Trustees  
**Case Number:** 2016CP2000294  
**Type:** Order/Compel

So Ordered

s/John C. Hayes III 2049

Electronically signed on 2018-09-12 10:38:34 page 8 of 8

ELECTRONICALLY FILED - 2018 Sep 12 10:51 AM - FAIRFIELD - COMMON PLEAS - CASE#2016CP2000294

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM FAIRFIELD COUNTY  
In The Circuit Court

Brian M. Gibbons, Circuit Court Judge

Appellate Case No. 2019-00-01956

**RECEIVED**  
DEC 19 2019  
SC Court of Appeals

MOZELL TIMMS FORD, MARGARET GAITHER, GRACENE HAYDEN, JOHN H. HAYES, ALFRED HOLMES, SHERYL KENNEDY, DEBORAH NELSON-MOORE, PETER RICE, DOROTHY STEWART, and HASKELL TIDWELL, Sr., individually  
and on behalf of all persons similarly situated, and  
THE NEW CAMPGROUND OF CAMP WELFARE

Appellants,

vs.

CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND,  
ROGER HALL, RACHEL MILLS, MELISSA LAMAR and any other persons acting as  
Trustees of CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND,

Respondents.

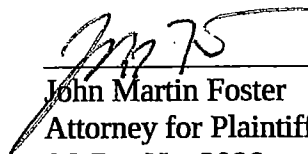
CERTIFICATE OF SERVICE

I certify that I have served the Petition for Rehearing, dated December 17, 2019, on the following counsel or persons of record on the date stated below:

Kenneth A. Davis  
Boykin & Davis, LLC  
Attorneys for Respondents  
Post Office Box 11844  
Columbia, S.C. 29211

Bishop Mildred H. Hines  
or Successor  
South Atlantic Episcopal District  
745 Saluda Street  
Rock Hill, S.C. 29730

Keeper of Records  
A.M.E. Zion Headquarters  
3225 Sugar Creek Road  
Charlotte, N.C. 28269

  
\_\_\_\_\_  
John Martin Foster  
Attorney for Plaintiffs  
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The Guardian Building  
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Rock Hill, S.C. 29731

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[jmfoster@comporium.net](mailto:jmfoster@comporium.net)

December 17, 2019

Rock Hill, South Carolina

STATE OF SOUTH CAROLINA ]  
 ]  
COUNTY OF FAIRFIELD ]

IN THE CIRCUIT COURT  
SIXTH JUDICIAL CIRCUIT

MOZELL TIMMS FORD, ]  
MARGARET GAITHER, ]  
GRACENE HAYDEN, ]  
JOHN H. HAYES, ]  
ALFRED HOLMES, ]  
SHERYL KENNEDY, ]  
DEBORAH NELSON-MOORE, ]  
PETER RICE, ]  
DOROTHY STEWART, and ]  
HASKELL TIDWELL, Sr, ]  
individually and on behalf of all persons ]  
similarly situated, and ]  
THE NEW CAMPGROUND OF ]  
CAMP WELFARE, a South Carolina ]  
eleemosynary corporation, ]

AMENDED COMPLAINT

C.A. No. 2016-CP-20-00294

Plaintiffs, ]

vs. ]

CAMP WELFARE A.M.E. ZION ]  
CHURCH AND CAMP GROUND, a ]  
South Carolina eleemosynary corporation, ]  
ROGER HALL, ]  
RACHEL MILLS, ]  
MELISSA LAMAR and ]  
any other persons acting as Trustees of ]  
CAMP WELFARE A.M.E. ZION ]  
CHURCH AND CAMP, ]

Defendants. ]

COME NOW the Plaintiffs, and for their Amended Complaint would show the following:

1. This Cause of Action is a derivative action by members of the named Defendant corporation as allowed under S.C. Code § 33-31-630; the headings herein are intended as indexing aides only.
2. The Plaintiffs MOZELL TIMMS FORD, MARGARET GAITHER, GRACENE HAYDEN, JOHN H. HAYES, ALFRED HOLMES, SHERYL KENNEDY, DEBORAH NELSON-MOORE, PETER

RICE, DOROTHY STEWART, and HASKELL TIDWELL, Sr. are, and at all times mentioned in this Complaint have been the owners and holders of interest in CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND, and bring this action on the Plaintiffs' own behalf and on behalf of all other owners and holders of interests in CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND similarly situated, in the right of that corporation and for its benefit.

3. The Plaintiff THE NEW CAMPGROUND OF CAMP WELFARE is a South Carolina eleemosynary corporation whose purpose is, *inter alia*, to represent and promote all owners and holders of interests in CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND, in the right of that corporation and for its benefit.
4. CAMP WELFARE A.M.E. ZION CHURCH AND CAMP GROUND, the Defendant Corporation, at all times mentioned in this Complaint was and still is an eleemosynary corporation duly organized and existing under the laws of the State of South Carolina and duly authorized and licensed to operate within that State.
5. On knowledge and information, at all times mentioned in this Complaint, the executive office of the Defendant corporation was and still is located near the Town of Mitford in the County of Fairfield, South Carolina, where its principal records are kept and where the meetings of its Trustees and tentholders are held.
6. At all times mentioned, defendant corporation was and now is engaged principally in the maintenance and operation of a religious campground and small church, both subject to the discipline, usage and ministerial affairs of the African Methodist Episcopal Zion Church.
7. The said campground is located on ca. 11.5 acres with a collection of ca. 100 one-story frame weather-boarded cabins call tents and an Arbor for worship; the builder and owners (herein also: "tentholders") of these tents include the named Plaintiffs, and all those members of THE NEW CAMPGROUND OF CAMP WELFARE.
8. This campground was founded shortly after the Civil War and is host to a yearly meeting held during the last week of August, with religious services being the focal point of the meetings. The Tentholders are the descendants of slaves owned by G. H. McMaster, the original landowner of the real property on which the campground is located.
9. The Defendants ROGER HALL, RACHEL MILLS and MELISSA LAMAR are the present known Trustees and officers of the Defendant corporation.

10. At all times mentioned in this Complaint since 2011, the management of defendant corporation, consisting of the Trustees and their family, have continuously controlled, directly, indirectly and beneficially, the Defendant corporation, and by virtue of that control the management had, and in fact exercised, effective, continuous and actual domination of the Defendant corporation and of its policies, and nominated, appointed and elected its Trustees.

#### ILLEGAL SELECTION OF TRUSTEES

11. On knowledge and information, such control and domination by the said Trustees and their family was in violation of the Bylaws of the Defendant corporation and of the practice, prior to 2011 of including on the Board of Trustees two (2) Trustees from those churches having tentholders among their members:

Fairview A.M.E. Zion,	Great Falls, SC
Faith Temple Church of God,	Catawba, SC
Greater Mount Zion,	Winnsboro, SC
Holy Place Church Non-Denominational,	Chester, SC
Mount Zion Baptist,	Great Falls, SC
Mt. Nebo A.M.E. Zion,	Great Falls, SC
New Independence Methodist,	Winnsboro, SC
Paradise A.M.E. Zion,	Great Falls, SC
Pine Grove Baptist Church,	Winnsboro, SC
Pleasant Grove A.M.E. Zion,	Great Falls, SC
Rock Hill Baptist,	Winnsboro, SC
Rossville A.M.E. Zion,	Great Falls, SC
The Missionary Church International,	Lancaster, SC
White Oak Baptist,	Winnsboro, SC

12. Since 2011, such other Trustees have been systematically excluded and removed from the Board of Trustees of the Defendant corporation, leaving only those named Defendants and their family.

13. On knowledge and information, the present Trustees of the Defendant Corporation are self-perpetuating, having been selected by other than the members of that corporation, and by means other than an annual meeting of the members.

#### REFUSAL OF FINANCIAL INFORMATION

14. ¶491 of The Book of Discipline of The African Methodist Episcopal Zion Church provides as follows, in relevant part:

The chairperson shall . . . sign all orders for the paying out of money by the treasurer from the treasury. The secretary shall keep a faithful record of all . . . the transactions of the board, draw up and countersign all orders of the treasurer for the paying out of money, and make a report for the board of all their receipts and expenditures to each Quarterly Conference. The treasurer[‘s] . . . accounts shall be subject to the inspection of the Pastor in charge. All official church checks must be signed by not less than two officers of the board.

[Matter in brackets added for clarity.]

15. On knowledge and information, none of the requirements of ¶491 of The Book of Discipline set out above have been followed by the Defendants.

16. S.C. Code § 33-31-1620(a) provides as follows, in relevant part:

Except as provided in the articles or bylaws of a religious corporation, a corporation upon written demand from a member or the Attorney General shall furnish the demanding party its latest annual financial statements, . . .

17. On knowledge and information, there are no provisions in the Articles of Incorporation nor in any Bylaws of the Defendant corporation which negate the requirements of S.C. Code § 33-31-1620(a).

18. The Plaintiffs, or those acting on their behalf, have made written demand upon the Defendant ROGER HALL as Trustee for financial statements since 2011, but the Defendant Trustees have failed and refused to supply such statements, in violation of S.C. Code § 33-31-1620(a).

## ILLEGAL EXCLUSION OF MEMBERS

19. Since the period when such concerns as to the financial statements and as to repairs needed on the Camp Ground were raised by the Plaintiffs, the Plaintiffs and other members of the Defendant corporation have been told that they have no right to such information, have been accused of "unchristian behavior", and attempts were made to bar the members from the use of the Camp Ground and effectively to exclude their membership in the Defendant corporation.
20. Since the period when such concerns as to the financial statements and as to repairs needed on the Camp Ground were raised by the Plaintiffs, the Plaintiffs have been excluded from the cemetery maintained on the Camp Ground premises, in which many of the Plaintiffs have family buried.
21. S.C. Code § 33-31-621 provides, in relevant part:
  - (a) No member of a public benefit or mutual benefit corporation may be expelled or suspended, and no membership or memberships in such corporations may be terminated or suspended except pursuant to a procedure that is fair and reasonable and is carried out in good faith.
  - (b) A procedure is fair and reasonable when either:
    - (1) the articles or bylaws set forth a procedure that provides:
      - (i) not less than fifteen days prior written notice of the expulsion, suspension, or termination and the reasons therefore; and
      - (ii) an opportunity for the member to be heard, orally or in writing, not less than five days before the effective date of the expulsion, suspension, or termination by a person or persons authorized to decide that the proposed expulsion, termination, or suspension not take place; or
    - (2) it is fair and reasonable taking into consideration all of the relevant facts and circumstances.
  - (c) Any written notice given by mail must be given by first class or certified mail sent to the last address of the member shown on the corporation's records.
22. Despite the actions of the Defendant Trustees to effectively exclude the Plaintiffs and persons in similar situation from membership in the Defendant corporation and from use of its facilities, none

of the requirements of S.C. Code § 33-31-621 have been followed, in that A) neither the Articles of Incorporation nor any Bylaws set forth the required procedure referenced above, and B) no such written notice has been sent to the Plaintiffs or persons in a similar situation.

## SECOND, ALTERNATIVE CAUSE OF ACTION

23. All matters, set out elsewhere in this Complaint and consistent herewith, are realleged hereby as fully as if set out herein.
24. The individual Plaintiffs, and those in a similar situation, are the owners of summer cabins or tents located on the Camp Ground referenced above in Fairfield County, South Carolina.
25. The Plaintiffs and their predecessors, acting individually, at various times since ca. 1876 or earlier, have built and made extensive improvements to those summer cabins or tents located at the above-mentioned Camp Ground on real property owned by the Defendant corporation, with the consent and express permission of that corporation.
26. The cabins were built around the Camp Ground over the course of many years, by friends, neighbors, and agents of the Defendant corporation as owner of the real property, and with the express consent of the Defendant corporation as owner of the real property.
27. The Defendant corporation extended permission to build the cabins or tents and make the extensive improvements to the cabins or tents for the express purpose of having companionship of others, the help of cabin or tent owners in protecting the real property, and their availability for upkeep of the Camp Ground.
28. For many years, and at least until 2012, relations between the cabin or tent owners and the Defendant corporation were very friendly. The cabins or tents were inherited or transferred without interference from the Defendant corporation.
29. The cabins or tents were expanded and improvements were made to them. The Defendant corporation was advised of the inheritance or transfer of the cabins or tents, sometimes after the fact.
30. The Defendant corporation was aware of the continuing maintenance of the cabins or tents.
31. The Defendant corporation never served a notice of termination upon any of the cabin or tent owners.

32. The Defendant corporation from time to time collected fees and charges, some of which were specifically stated by the Trustees and agents of that corporation to be for the purpose of performing upkeep and repairs on the Camp Ground property.
33. On knowledge and information, such collected fees and charges were not, in fact, used for the purpose of performing upkeep and repairs on the Camp Ground property, but were, in fact, converted to the use of those named individual Trustees, their family and other third persons.
34. The conduct of the Defendant corporation, by and through its Trustees and agents, created a constructive trust in the improvements of the cabin or tent owners, and in those funds collected from them by the said corporation.
35. The said constructive trust was imposed upon the Defendant corporation as an equitable lien on the real property of the Camp Ground and on the collected funds in favor of the Plaintiffs and persons in a similar situation.
36. On knowledge and information, and based upon the actions and inaction of the Defendants, there is a reasonable likelihood of the repetition of, or the continuation of the effects of, the past actions and inaction referenced above.
37. The Plaintiffs and those persons in a similar situation have no adequate or speedy remedy at law, and this action for injunctive relief is the Plaintiffs' only means for securing adequate relief.
38. On knowledge and information, immediate and irreparable injury, loss or damage will result to the Plaintiffs and those persons similarly situated by reason of the Defendants' threatened actions and inaction inasmuch as they may be deprived of their right to use the Camp Ground and their cabins or tents, and be deprived of their funds collected for the purpose of performing upkeep and repairs on the Camp Ground property.
39. On knowledge and information, the threatened actions and inaction of the Defendants will cause the Plaintiffs and those in a similar situation to lose the quiet enjoyment of their respective interest in the cabins or tents they own, and in the Camp Ground.
40. On knowledge and information, the above-referenced immediate and irreparable injury, loss or damage is within the meaning of Rule 65(b), S.C.R.C.P., and will result to the Plaintiffs and those persons in a similar situation before the regular notice for the issuance of a temporary restraining order can be served a hearing held thereon in the absence of an *Ex Parte* order restraining the Defendants from the actions and inaction threatened above.

41. The Plaintiffs ask that this verified Complaint be accepted by this Court as their Affidavit for the purpose of the issuance of any order, *Ex Parte*, Temporary, *Pendente Lite* or permanent, restraining the acts or inaction complained of herein.

WHEREFORE, the Plaintiffs pray that this Court:

1. Assume jurisdiction of this case;

AS TO THE FIRST CAUSE OF ACTION:

2. Issue its Order requiring the Defendant corporation to conduct an annual or special meeting to properly elect Trustees of that corporation;
3. Issue its Order requiring the Defendant corporation to produce financial statements and records as to all transactions since 2011;
4. Issue its Order requiring the Defendant corporation and the Individual Defendants to account jointly and severally to the Defendant corporation for all the acts and transactions complained of and that they be directed to pay over and restore to the Defendant corporation the amount of all losses occasioned by the acts and transactions and of all profits and gains realized by the individual Defendants or any of them by the acts and transactions;
5. Issue its Order requiring the individual Defendants jointly and severally to account for and pay over and restore to the Defendant corporation moneys caused by them to be paid to those Defendants or any of them in excess of the amounts found to represent the fair and reasonable amount of the services rendered to the Defendant corporation by the recipients;
6. Award to the Plaintiffs out of any recovery in this action the reasonable costs and disbursements incident to the prosecution of this action, including reasonable fees to the attorneys for the Plaintiffs;

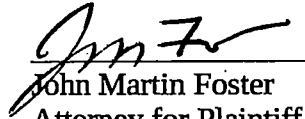
AS TO THE SECOND CAUSE OF ACTION:

7. Accept this verified Complaint as their Affidavit for the purpose of the issuance of any order, *Ex Parte*, Temporary, *Pendente Lite* or permanent, restraining the acts or inaction complained of herein.

8. Award the Plaintiffs and those persons similarly situated actual damages from the Defendants to be established at trial;
9. Award the Plaintiffs their reasonable costs and expenses from the Defendants;
10. Award the Plaintiffs exemplary and punitive damages from the Defendants by reason of the Defendants' grossly negligent, willful, wanton and malicious actions as set out and referenced above;

AS TO ALL CAUSES OF ACTION:

11. Include a prayer for other relief which may be authorized for the Plaintiffs under other causes of action; and
12. Award or allow such other and further relief as this Court deems just and proper.

  
\_\_\_\_\_  
John Martin Foster  
Attorney for Plaintiff

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223 East Main Street, Suite 520  
Rock Hill, S.C. 29730

Post Office Box 106  
Rock Hill, S.C. 29731

803 324-8100  
803 324-8109: Fax  
jmfoster@comporium.net

February 22, 2018

Rock Hill, South Carolina





STATE OF SOUTH CAROLINA ]  
COUNTY OF FAIRFIELD ]

IN THE CIRCUIT COURT  
SIXTH JUDICIAL CIRCUIT

MOZELL TIMMS FORD, ]  
MARGARET GAITHER, ]  
GRACENE HAYDEN, ]  
JOHN H. HAYES, ]  
ALFRED HOLMES, ]  
SHERYL KENNEDY, ]  
DEBORAH NELSON-MOORE, ]  
PETER RICE, ]  
DOROTHY STEWART, and ]  
HASKELL TIDWELL, Sr, ]  
individually and on behalf of all persons ]  
similarly situated, and ]  
THE NEW CAMPGROUND OF ]  
CAMP WELFARE, a South Carolina ]  
eleemosynary corporation, ]  
] ]  
Plaintiffs, ]

CERTIFICATE OF SERVICE

C.A. No. 2016-CP-20-00294

vs. ]

CAMP WELFARE A.M.E. ZION ]  
CHURCH AND CAMP GROUND, a ]  
South Carolina eleemosynary corporation, ]  
ROGER HALL, ]  
RACHEL MILLS, ]  
MELISSA LAMAR and ]  
any other persons acting as Trustees of ]  
CAMP WELFARE A.M.E. ZION ]  
CHURCH AND CAMP, ]  
] ]  
Defendants. ]

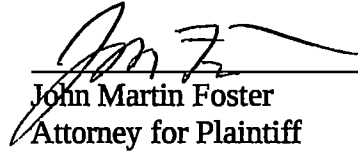
The undersigned certifies that he has served the following pleadings or documents in the above-captioned and numbered civil action:

Summons, Amended Complaint; and  
This Certificate of Service

by depositing the same with the United States mail, with sufficient first class postage attached, properly addressed to the clerk of the Court, and with a copy also directed to the respective last known address(es) of those attorney(s) and/or persons set out below; or

by hand delivering copies of the same to the following persons, or by leaving the same at that person's office with that person's clerk or some other person in charge thereof, or by leaving it in a conspicuous place therein; or if the office was closed or the person to be served has no office, by leaving a copy at that person's dwelling place or usual place of abode with some person of suitable age and discretion then residing therein, all pursuant to Rule 6(b), S.C.R.C.P.

Kenneth A. Davis  
Boykin & Davis, LLC  
P.O. Box 11844  
Columbia, S.C. 29211

  
\_\_\_\_\_  
John Martin Foster  
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February 27, 2018

Rock Hill, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF FAIRFIELD

MORZELL TIMMS FORD,  
MARGARET GAITHER,  
GRANCENE HAYDEN,  
JOHN H. HAYES,  
ALFRED HOLMES,  
SHERYL KENNEDY,  
DEBORAH NELSON-MOORE,  
PETER RICE,  
DOROTHY STEWART,  
HASKELL TIDWELL, Sr.,  
individually and on behalf of all persons  
similarly situated, and  
THE NEW CAMP GROUND OF  
CAMP WELFARE, a South Carolina  
eleemosynary corporation,

Plaintiff(s)

v.

CAMP WELFARE A.M.E. ZION  
CHURCH AND CAMPGROUND, a  
South Carolina eleemosynary corporation,  
ROGER HALL,  
RACHEL MILLS,  
MELISSA LAMAR and  
any other persons acting as Trustees of  
CAMP WELFARE A.M.E. ZION  
CHURCH AND CAMP,

Defendants.

IN THE CIRCUIT COURT

SIXTH JUDICIAL CIRCUIT

C.A. No.: 2016-CP-20-00294

**DEFENDANTS' ANSWER AND  
AFFIRMATIVE DEFENSES TO  
AMENDED COMPLAINT**

Defendants Camp Welfare A.M.E. Zion Church and Camp Ground (hereinafter the "Camp Welfare"), Roger Hall, Rachel Mills, and Melissa Lamar (hereinafter collectively referred to as "Defendants"), hereby respond to the Amended Complaint of Plaintiffs in accordance with the numbered paragraphs thereof, as follows:

COME NOW the Plaintiffs, and for their Amended Complaint would show the following:

1. Denied.

2. Denied.

3. The Defendants deny the New Campground of Camp Welfare represents any owners of interests in Camp Welfare A.M.E. Zion Church and Camp Ground do not know enough information to comment about the remaining allegations of Paragraph 3 of the Complaint.

4. Admitted in part and denied in part. Defendants admit that a Certificate of Incorporation was issued in the name of Camp Welfare A.M.E. Zion Church and Camp Ground and deny that Camp Welfare A.M.E. Zion Church and Camp Ground operates as an eleemosynary corporation.

5. Admitted in part and denied in part. Defendants admit that Camp Welfare A.M.E. Zion Church and Campground is located in Fairfield County, South Carolina and deny the remaining allegations of Paragraph 5 of the Complaint.

6. Admitted in part and denied in part. Defendants deny that Camp Welfare A.M.E. Zion Church and Camp Ground operates as an eleemosynary corporation and admits the remaining allegations of Paragraph 6 of the Complaint.

7. Defendants admit that the Camp Ground is located on 11.5 acres and includes tents and an arbor. Defendants do not know enough information to comment about the remaining allegations of Paragraph 7 of the Complaint.

8. Defendants admit the first sentence of Paragraph 8 of the Complaint and do not know enough information to comment about the remaining allegations of Paragraph 8 of the Complaint.

9. Admitted in part and denied in part. Defendants deny that Camp Welfare A.M.E. Zion Church and Camp Ground operates as an eleemosynary corporation and admits the remaining allegations of Paragraph 9 of the Complaint.

10. Denied.

ILLEGAL SELECTION OF TRUSTEES

11. Denied.

12. Denied.

13. Denied.

REFUSAL OF FINANCIAL INFORMATION

14. This paragraph does not require a reply.

15. Denied.

16. This paragraph includes a legal conclusion and does not require a response. To the extent a response is required, Defendants deny that this provision applies to Camp Welfare A.M.E. Zion Church and Camp Ground.

17. Denied.

18. Denied.

ILLEGAL EXCLUSION OF MEMBERS

19. Denied.

20. Denied.

21. This paragraph includes a legal conclusion and does not require a response. To the extent a response is required, Defendants deny that this provision applies to Camp Welfare A.M.E. Zion Church and Camp Ground.

22. Denied.

SECOND, ALTERNATIVE CAUSE OF ACTION

23. Defendants reallege and incorporate by reference their responses to each and every preceding paragraph as if set forth fully herein.

24. Defendants do not know enough information to comment about the allegations of Paragraph 24 of the Complaint.

25. Defendants deny that Camp Welfare A.M.E. Zion Church and Camp Ground operates as an eleemosynary corporation and Defendants do not know enough information to comment about the remaining allegations of Paragraph 25 of the Complaint.

26. Defendants deny that Camp Welfare A.M.E. Zion Church and Camp Ground operates as an eleemosynary corporation and Defendants do not know enough information to comment about the remaining allegations of Paragraph 26 of the Complaint.

27. Defendants deny that Camp Welfare A.M.E. Zion Church and Camp Ground operates as an eleemosynary corporation and Defendants do not know enough information to comment about the remaining allegations of Paragraph 27 of the Complaint.

28. Defendants deny that Camp Welfare A.M.E. Zion Church and Camp Ground operates as an eleemosynary corporation and Defendants do not know enough information to comment about the remaining allegations of Paragraph 28 of the Complaint.

29. Defendants deny that Camp Welfare A.M.E. Zion Church and Camp Ground operates as an eleemosynary corporation and Defendants do not know enough information to comment about the remaining allegations of Paragraph 29 of the Complaint.

30. Defendants deny that Camp Welfare A.M.E. Zion Church and Camp Ground operates as an eleemosynary corporation and admit the remaining allegations of Paragraph 30 of the Complaint.

31. Defendants deny that Camp Welfare A.M.E. Zion Church and Camp Ground operates as an eleemosynary corporation and admit the remaining allegations of Paragraph 31 of the Complaint.

32. Defendants deny that Camp Welfare A.M.E. Zion Church and Camp Ground operates as an eleemosynary corporation and admit the remaining allegations of Paragraph 32 of the Complaint.

33. Denied.

34. The allegations contained in Paragraph 34 of the Complaint set forth conclusions of law and therefore no response is required. To the extent a response is required, the allegations are denied.

35. The allegations contained in Paragraph 35 of the Complaint set forth conclusions of law and therefore no response is required. To the extent a response is required, the allegations are denied.

36. Denied.

37. The allegations contained in Paragraph 37 of the Complaint set forth conclusions of law and therefore no response is required. To the extent a response is required, the allegations are denied.

38. The allegations contained in Paragraph 38 of the Complaint set forth conclusions of law and therefore no response is required. To the extent a response is required, the allegations are denied.

39. Denied.

40. The allegations contained in Paragraph 40 of the Complaint set forth conclusions of law and therefore no response is required. To the extent a response is required, the allegations are denied.

41. Defendants deny the requested relief.

WHEREFORE, the Plaintiffs pray that this Court:

1. Defendants deny the requested relief.

AS TO THE FIRST CAUSE OF ACTION:

2. Defendants deny the requested relief.

3. Defendants deny the requested relief.

4. Defendants deny the requested relief.

5. Defendants deny the requested relief.

6. Defendants deny the requested relief.

AS TO THE SECOND CAUSE OF ACTION

7. Defendants deny the requested relief.

8. Defendants deny the requested relief.

9. Defendants deny the requested relief.

10. Defendants deny the requested relief.

AS TO ALL CAUSES OF ACTION

11. Defendants deny the requested relief.

12. Defendants deny the requested relief.

**FIRST AFFIRMATIVE DEFENSE**

The court lacks subject matter jurisdiction under the First Amendment of the United States Constitution and the matter should be dismissed pursuant to Rule 12(b)(1), SCRCP.

**SECOND AFFIRMATIVE DEFENSE**

Plaintiffs fail to state facts sufficient to constitute a cause of action, and therefore, Plaintiffs' claims should be dismissed pursuant to Rule 12(b)(6), SCRCP.

**THIRD AFFIRMATIVE DEFENSE**

Plaintiffs failed to join a party, the African Methodist Episcopal Zion Church, Inc., needed for just adjudication pursuant to Rule 19, SCRPC.

**FOURTH AFFIRMATIVE DEFENSE**

Plaintiff The New Camp Ground of Camp Welfare lacks standing to assert the claims in the Amended Complaint.

**FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs are not members of Camp Welfare A.M.E. Zion Church and have no privileges as members.

**SIXTH AFFIRMATIVE DEFENSE**

This matter is fundamentally a church dispute involving religious law, principle, doctrine, discipline, custom, administration and/or governance, and therefore, must be resolved pursuant to the First Amendment of the United States Constitution. The applicable rules governing the affairs of the A.M.E. Zion Church and its member churches, including Camp Welfare A.M.E. Zion Church and Campground, are located in *The Doctrine and Discipline of the African Methodist Episcopal Zion Church*, which is the governing ecclesiastical doctrine and constitution of the A.M.E. Zion Church and its member churches.

**SEVENTH AFFIRMATIVE DEFENSE**

The South Carolina Nonprofit Corporation Act, S.C. Code Ann. § 33-31-80, expressly provides that if religious doctrine governing the affairs of a religious corporation is inconsistent with the provisions of the Act on the same subject, the religious doctrine controls to the extent required by the Constitution of the United States or the Constitution of South Carolina, or both. Thus, the provisions found in *The Doctrine and Discipline of the African Methodist Episcopal Zion Church* govern this matter.

**EIGHTH AFFIRMATIVE DEFENSE**

Under neutral principles of law, the question as to the control and management of the property owned by Camp Welfare A.M.E. Zion Church and Campground is determined by *The Doctrine and Discipline of the African Methodist Episcopal Zion Church*, which is the final and binding decision of the highest religious judicatories as to religious law, principle, doctrine, discipline, custom, administration, or governance in this dispute.

**NINTH AFFIRMATIVE DEFENSE**

Title to the subject property is in the name of Camp Welfare A.M.E. Zion Church and Campground in trust for the A.M.E. Zion Church, Inc. Plaintiffs do not have any legal or beneficial ownership interest in the subject property.

**TENTH AFFIRMATIVE DEFENSE**

The subject property is so commingled with the A.M.E. Zion Church, its customs, tradition, and polity, as evidence by the use and enjoyment of the subject property by generations of A.M.E. Zion Church congregations, in support and used as property of the A.M.E. Zion Church in furtherance of its missions, objectives, and cot.

**ELEVENTH AFFIRMATIVE DEFENSE**

Under neutral principles of law, the question as to who may serve as trustees or elect trustees of Camp Welfare A.M.E. Zion Church and Campground is determined by *The Doctrine and Discipline of the African Methodist Episcopal Zion Church*, which is the final and binding decision of the highest religious judicatories as to religious law, principle, doctrine, discipline, custom, administration, or governance in this dispute.

**TWELFTH AFFIRMATIVE DEFENSE**

Plaintiffs have no right to elect trustees of Camp Welfare A.M.E. Zion Church as they are not members.

**THIRTEENTH AFFIRMATIVE DEFENSE**

Defendants Roger Hall, Rachel Mills, and Melissa Lamar are the duly elected trustees of Camp Welfare A.M.E. Zion Church and Campground in accordance with the provisions of *The Doctrine and Discipline of the African Methodist Episcopal Zion Church*, its governing ecclesiastical doctrine and constitution, and have at all times acted in accordance with their authority set forth therein.

**FOURTEENTH AFFIRMATIVE DEFENSE**

Plaintiffs have come to the court requesting equitable relief with unclean hands and are therefore barred from all such equitable relief sought.

**FIFTEENTH AFFIRMATIVE DEFENSE**

Defendants reserve the right to amend its Answer and to assert any additional affirmative defenses based upon either the law of South Carolina or the facts and circumstances which may be disclosed throughout discovery.

Respectfully submitted,

BOYKIN & DAVIS, LLC

By: s/Tierney Dukes

Kenneth A. Davis, Esq.  
Tierney F. Dukes, Esq.

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Facsimile: 803-254-5609

Attorneys for Camp Welfare A.M.E. Zion  
Church and Camp Ground

September 26, 2018  
Columbia, South Carolina