

January 15, 2022

To: The South Carolina Court of Appeals

In the Matter of the Estate of Thomas Gaddy Moore

The Appellant Michael Dennis Moore

Vs.

The Respondents Thomas Paul Moore, Phillip Frederick Moore, Francine Lawhon,
and Linda Kaye Moore who is deceased at this time

Appellate Case No: 2018-00114

To The South Carolina Court of Appeals
Michael Dennis Moore, Pro-Se

RECEIVED

JAN 20 2022

SC Court of Appeals

*The Honorable Ms. Jenny Abbott Kitchings - Clerk of Court.
Ms. Kitchings Could you Please Filed these letters
For I, Dennis Moore With the Courts. Because as you
Know the Courts has dismiss my attorney and now
I am Pro-SEI and I have to represent my ownself.*

*Thanks
Dennis Moore*

The reason that I, Michael Dennis Moore, am writing this letter (1-15-22) to the South Carolina Court of Appeals is because I am the personal representative of my father, Thomas Gaddy Moore's, estate. When my father was living, I was also the power of attorney over him and all of his assets. My father obviously had a lot of faith in his son to carry out his wishes in his estate and over his life.

I will not stop until I have taken this case to the highest of courts. There will be more attorneys involved. Some court some where will give me justice, whether it be the Supreme Court or some sort of malpractice attorney because I know for a fact that I did not do what they said I have done.

I also want the South Carolina Court of Appeals to know that I disagree with the court's decision to let my appeals attorney, David Durant Jr., off the case. David Durant Jr. lied to the court when he said I was making false accusations against him and his law firm. I believe that the courts err based on false accusations and hearsay. The courts never sent me a letter telling me what the false accusations were about, they just took David Durant Jr's word. They never had any proof that I was making false accusations against my appeals attorney, David Durant Jr. You mean to tell me that David Durant Jr. had this case for five years and now he decides to tell the courts that I was making false accusations. I have David Durant Jr. on tape if he says I was making false accusations. The real reason that David Durant Jr. and his law firm wanted off the case had nothing to do with false accusations. He knows that he and his law firm screwed up big time. What do I mean by that? Well, it's pretty bad for a circuit court judge, Thomas A. Russo, to put in his order and tell me the reason I lost the case if because my attorney, David Durant, Jr. did not bring in any new evidence. Here I am getting ready to get charged for checks that I never received. My name is nowhere on the checks at all. No courts, no attorneys, nor any judges have any deposit slips to back up what they are charging me for. You would think some judge from the probate court, the circuit court, or the South Carolina Court of Appeals would ask me if I even have this money where the deposit slips are to show where I put this money in my bank account. Every one of these attorneys that were present in probate court knew that Judge Scott and Pierce Campbell were from the same law firm and no one ever told me about it. If I would have known that, he would have never ruled on this case. The South Carolina Court of Appeals has already let my Appeals Attorney off of this case for no reason at all. I just hope and pray that you do not let this Probate Judge and his partner off the case and not charge them for what all they have done.

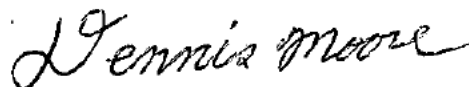
I had asked the South Carolina Judicial Department, Office of Disciplinary Council, to investigate this case on May 11, 2018 and never heard one word from them. That is why I am hoping that The South Carolina Court of Appeals is going to do an investigation into the Probate Judge and his partner, the opposing attorney. They should have never ruled on this case knowing that this was a conflict of interest where both of them were from the same law firm. They not

were not only involved in a conflict of interest, and misconduct, they have broken so many rules of law and they need have to repercussion for it. I would like to know from The South Carolina Court of Appeals how you are going to charge me for a crime that never happened. The South Carolina Court of Appeals said in their ruling that they are going to uphold the lower courts decision, when the lower court, including Thomas A. Russo, said in his order that the reason Dennis Moore lost is because his attorney David Durant Jr. did not bring in any new evidence. David Durant Jr. had ALL the evidence in his possession. Cal Pierce Campbell knew David Durant Jr.'s brother worked with and practiced law with them also. The South Carolina Court of Appeals said they are going to uphold the probate court's decision knowing this case involved misconduct and a conflict of interest from the beginning. You know there was no way that I, Dennis Moore, was ever going to get a fair trial when both of them were from the same law firm and both shareholders in the same law firm.

The South Carolina Court of Appeals is allowing me to be charged with a crime that never happened because a crooked Probate Judge and his partner said I got this money that I never received. Neither one of them have proof- no deposit slips where I put money in my account (personal or business) and they have no proof of any checks with MY NAME on them, yet the courts are going to charge me for it anyway? Pierce Campbell knows himself that he doesn't have proof that I have this money they are claiming that I have. That was the reason he called my attorney, David Smith, and told him that he would be willing to drop all charges against me if I would be willing to give his client my part of the estate that my father, Thomas Gaddy Moore, left me. I told my attorney, David Smith, to call him back and tell him no thanks. Now if I, Dennis Moore, thought for one minute that I was guilty of any charges that the Probate Judge put on me, I would have taken Mr. Pierce Campbell's offer but I was not going to give up something that my father left me for something that I did not do.

This case was a scam and fraud. From day one, no one has any evidence or proof of what they are accusing me of. If you do have checks, a promissory note, deposit slips, how about show them to me. I really do believe that I will find some judge or some attorney somewhere that will get me out of this mess that the attorney put me in.

Signed,
Dennis Moore

A handwritten signature in cursive script that reads "Dennis Moore". The signature is written in black ink and is positioned below the typed name.

Mr. C. Pierce Campbell, Esquire
PO Box 5478
Florence SC 29502

*Phillip Moore SR,
1504 Damon Drive
Florence S.C. 29505*

Mr. James Ross Snell, Jr., Esquire
123 Harmon Street
Lexington SC 29072

Ms. Vicki D Koutsogiannis, Esquire
123 Harmon Street
Lexington SC 29072

Francine Laura Lawhon
2005 Third Loop Rd.
Florence SC 29501

Re: In the Matter of the Estate of: Thomas G. Moore
Appellate Case No. 2018-001144

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JAN 20 2022

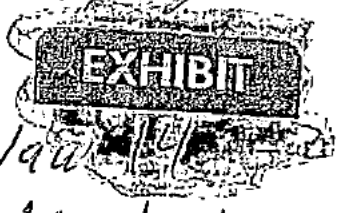
SC Court of Appeals

Dear Mr. Moore, Ms. Lawhon and Counsel:

*I, Dennis Moore are sending all of you a copy of the
letter's that I have send to the Courts For them
to Filed For me and put on record. Pro-SE.*

MOORE'S CARS LLC SINCE 1948 1827 TRADE ST FLORENCE, SC 29501	4578 67-574532
PAY TO THE ORDER OF <i>D. Moore</i>	DATE <i>11/25/12</i>
<i>50,000.00</i>	\$ <i>50,000.00</i>
ANDERSON BROTHERS BANK	DOLLARS
MEMO <i>Payment from Tom's Home of Stone Club note by [unclear]</i>	

Now The South Carolina Court of Appeals Said in there letter that they are going to uphold the lower courts decision. Well I, Dennis Moore also agree with the lower court decision in Circuit Court where Thomas A. Russo said the reason that I, Dennis Moore loss was because of his appeals attorney, David Durant JR, did not produce NO NEW EVIDENCE. David Durant JR, had all the evidence he need to clear this matter up but he could not bring the evidence out because he never told his client that his Brother was practicing law with the same law firm that was suing his client Dennis. For \$ 699,388.00 dollars He never told me that until we had all ready went to Circuit Court they did called me 9 months later



MOORE'S CARS LLC
SINCE 1943
1827 TRADE ST
FLORENCE, SC 29501

4578
67-674/532

DATE 1/23/12

PAY TO THE ORDER OF

T. Moore

\$ 50,000.00
DOLLARS

Security features included. Details on back.

ANDERSON BROTHERS BANK
Florence, S.C. 29504
www.abbank.com

To buy car insurance

MEMO

Repayment loan to T.G. Moore
check wrote by T.G.M.

ENDORSE HERE
[Handwritten signatures and stamps]

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE



The security features listed below, as well as those not listed, exceed industry guidelines.

- Microprint Signature Line
- Void Separator Lines
- Intelligent Mail Barcode
- Chemically Sensitive Paper
- Size of spots may vary with chemical interaction
- Multiple Fluorescent Fibers: Cannot be reproduced on production copiers
- Security Screen: Absence of Original Document watermark on back of check when photocopied

FEDERAL RESERVE BOARD OF GOVERNORS REG. CC

Take a look at this check wrote to Thomas G. Moore
Buy Thomas G. Moore and it says on the bottom
Repayment to T.G. Moore and on the back of the check
Thomas G. Moore deposit only.

Now Dennis Moore name is not on the check front or
back and you can see it was never deposit in my account,
But yet the South Court of Appeals is going to uphold
the lower court decision. When the lower court said I lost because
OF MY ATTORNEY.

MOORE'S CARS LLC SINCE 1943 1827 TRADE ST FLORENCE, SC 29501	4604 67-574532
DATE <u>10-31-12</u>	
FAY TO THE ORDER OF <u>Phillip Moore</u>	
<u>2000.00</u> DOLLARS	
ANDERSON BROTHERS BANK	Payment of Yoda to Phillip Moore
MEMO <u>Dept in Citizens Bank</u>	

I have one question to ask The South Carolina Court of Appeals, Why Come these checks Was not presented at the hearing on **December 23, 2015** in Probate Court. I think We all know why, because Phillip Moore SR, Waited until he went into the probate Court Chamber and talk to the Judge J. Munford Scott one on one With out a attorney present. Now is that Legal

For someone to go in the Judge Chambers and talk to him about this Case one on one. Now my appeal attorney had a Copy of the letter Where Phillip Moore SR, said himself that he talk to Judge Scott about this Case and Judge Scott agree with him.

No one knows What they talk About.



MOORE'S CARS LLC
SINCE 1943
1827 TRADE ST
FLORENCE, SC 29501

4604
67-674/532

DATE ~~12-31-12~~

PAY TO THE ORDER OF

Thomas G Moore

\$ 59,000⁰⁰

Fifty thousand dollars

DOLLARS



Repayment of loans to Moore cars

MEMO

Dept in Citizens bank

check wrote by T.G.M.

1 The security features listed below, as well as those not listed, exceed industry guidelines.

- Microprint Signature Line and Separator Lines: Small type in lines appears as dotted lines when photocopied
- Chemically Sensitive Paper: Stains or spots may appear with chemical alteration
- Invisible Fluorescent Fibers: Cannot be reproduced on photocopies
- Security Schemes: Original Document watermark on back of check when photocopied

Product design is a trademark of the Check Payment Systems Association
FEDERAL RESERVE BOARD OF GOVERNORS REG. CC

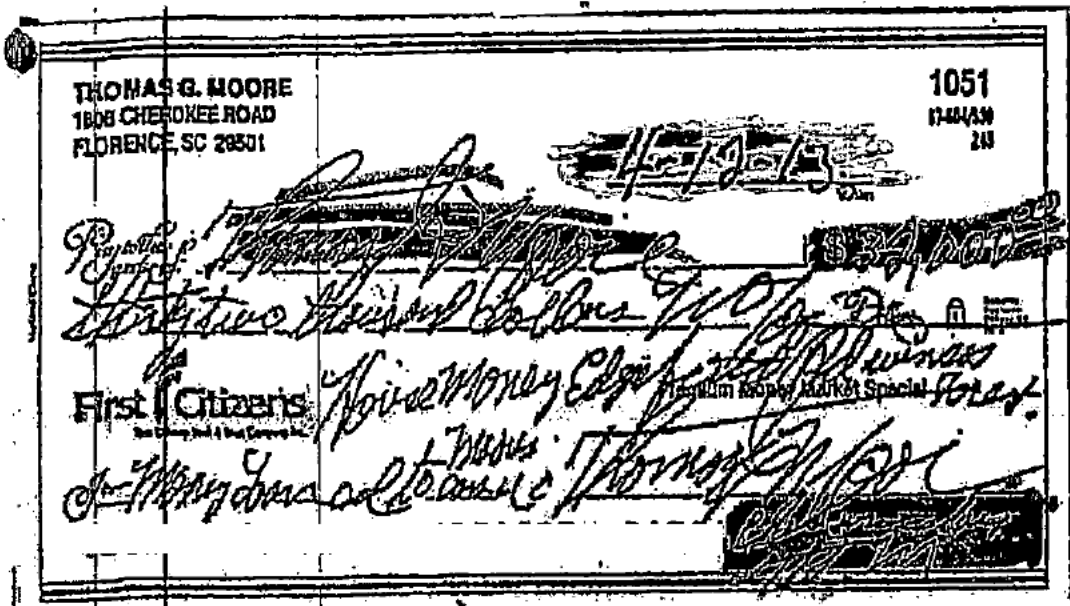
12/31/12 Batch 357

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE

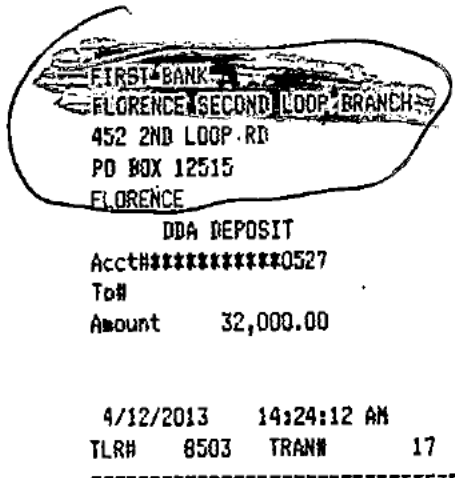
Thomas G Moore
Date 12/31/12
Thomas G Moore

Once again Thomas G. Moore sign the Bottom of the Check made check out pay to the order of Thomas G. Moore and Thomas G. Moore sign the Back of the Check and put deposit only.

Now the Courts are going to make Dennis Moore paid For something that my Father Thomas G. Moore Done With his on money. I, Dennis Moore Cant telled my Father What to do with his on money.



Look Where someone took a Permanent marker and Black it out. It had to be one of my brother because it did not come from the Bank like that.



Now Here is another Check that David Purant JR. Could have argue For his client And Now because he missed it The South Carolina Court of Appeals are going to Charge Dennis Moore For his mistake knowing I never got this money.

Dennis Moore once again Never has Bank With First Bank.



May 11, 2018

To: South Carolina Judicial Department - Office of Disciplinary Counsel

I, Dennis Moore, would like to file a complaint against an attorney and a judge. I'd like to know if what they did was wrong. I would like for the disciplinary counsel to investigate this case. I do believe that with corruption that is going on in our court system that I was a victim in this case and feel as though my rights were violated. I was always told that everyone has their constitutional rights in a court of law.

I'd like to explain to you the outrageously corrupt situation that happened to me with the court system with an attorney and judge. I believe they need to be held accountable for their actions that took place within the party of the judge and attorney. I hope and pray that someone from the counsel will review this case and file a claim or at some time submit it. This attorney as well as the judge involved need to be disqualified or disbarred for what they did within the court system. The corrupt judge and the unscrupulous attorney, without accountability, think they can do whatever they want to do to a person and the person has no right at all. The relationship between the two will tell it all. Everyone should have the right to ensure that the judge sitting in on their case doesn't have a conflict of interest, executive director of the National Council on the state courts. It is imperative that people have full faith and confidence in the judicial process. With what happened to me, I have no faith or confidence in our court system because after this event I feel as though there is corruption. What I've found is that it is not about what is right or wrong, but rather who you know or don't know.

I'd like to explain to you what happened to me during the death of my father in probate court. One thing I would like to ask the disciplinary counsel is, "have you ever in your lifetime heard tell of a personal representative of an estate having to pay back money to the estate that is more than the estate itself (in additional to the fact that the Will states nothing about paying back or owing money)?" The judge ruled over my father's estate that I had to paid \$699,388.00 in to the estate. All I am asking is that you PLEASE look at the checks that I am sending you and explain to me why I am responsible for something that I have never done as well as never seen until I received a copy of the checks from my attorney yesterday (on May 10, 2018). The attorney and the judge said that my father loaned ME \$450,000.00 and now I must pay back that back to the estate. I would like for the counsel to take a good look at these checks that they are charging me for. My name is DENNIS MOORE. My name is not listed on the front of these checks and my name is not signed nor listed on the back of these checks. I never deposited this money in my bank account. To clear this up, all you (or anyone else) would have to do is go get and look at my bank account statements. You will clearly see that this money was NEVER deposited by me. My father took his money out of his OWN personal bank account and moved it over to his own side business account, not Moore's Cars, LLC/Dennis Moore's account. He loaned this money from his personal account to his business account to buy cars on the side. This is unrelated to my business as well as my bank account. If the attorney and the judge said that I have the money, please tell them to show you where I signed the back of these checks to show where I deposited the money in my business account. To do this, I would have had to sign the back of these checks. Also, there would be proof in my bank account where I received this money. My father had his own personal bank account, his own personal business account (which he called Moore's Cars, LLC) and I have my own personal bank account as well as my own personal business account (Moore's Cars, LLC/Dennis Moore). These are separate accounts operated by two different people. I did not control what my father did with his money, yet somehow,

they are saying that I am responsible for paying back what HE did. In addition to separate accounts, we also used different banks. We never banked together. I would like to know, after you read this letter, if you can tell me if there were any broken laws or some sort of misconduct between the attorney and judge involved in this case. You can clearly look at my Moore's Cars, LLC/Dennis Moore bank statement and see that none of the money mentioned in the case was ever deposited in MY account. I also wanted to mention in this letter what happened to me during this day of hell in court.

Let me explain a little about the court date. I had a case in probate with a judge named Munford Scott. The opposing attorney on this case was Mr. Cal Pierce Campbell. Now what I would like to know is if it was legal for a judge and the opposing attorney to rule on my father's estate case when the judge and opposing attorney were from the same law firm. That alone seems as though there would be a conflict of interest when a judge and an attorney are both from the same law firm. Let me explain what took place during my father's death in a corrupt probate court. My brother and his attorney, Mr. Campbell, brought claims against me and told the judge that I owe the estate money where my father loaned ME and company money. The checks provided prove differently. Also, keep in mind that despite the facts and evidence provided, my father's Last Will and Testament states nothing about me owing money back to him NOR his estate. The judge nor the attorney from the same law firm don't have any legal documents from my father saying that I owe him or the estate any money. This was something that they came up with on their own based on previous feelings of jealousy over the relationship that I had with my father. Their main goal is to see me left standing with nothing, and to lose everything that I have spent my entire life working for. If my father were here today, he would tell the judge, the attorney, and anyone else who needed to know that I don't owe him anything. That's how close we were. All he wanted was a relationship with all of his children, but no one ever stuck around except me, until he was gone, and money was involved. Mr. Campbell is the only attorney that is left on my father's estate case. What I don't understand about this case is that my other brother, Phillip Moore, hired FOUR other law firms and they all told him that he didn't have a case and they could not come up with anything against me or the estate. When my other brother, Thomas P. Moore, went and hired Mr. Campbell, apparently, he had all the answers. Could it have been because Mr. Campbell and the judge were from the same law firm (Turner Padgett)? I do know one thing that is for sure - the internet sometimes tells it all. I also want everyone to know how unfair it was that the opposing attorney, Mr. Campbell, and the judge, Munford Scott, ruled on this case when they were from the same law firm and they both practiced law side by side at Turner Padgett before he became a judge in 2014. What I don't understand about all of this is that they both knew each other, yet no one stepped down from presiding over this case. No one recused themselves. I really do believe that they thought they would not get caught. It was so wrong for them to do that, no matter who it was. My question to the disciplinary counsel is, "why would the judge himself not step down from presiding over this case and/or why would the attorney not do the same?" They both knew that they were from the same law firm and they knew that they knew each other and had a personal connection with one another. In addition to the facts already stated, Mr. Campbell is a shareholder in Turner Padgett. The judge ^{WJQS} also currently employed with Turner Padgett. There was no way that the judge was going to allow for Mr. Campbell to lose this case because they are from the same party. There is also financial interest for the opposing attorney with him being a shareholder in Turner Padgett. Right then and there the judge just made Mr. Campbell's stocks go up by ruling a case of \$699,388.00. Nice work guys, you both really put it to me! Now my thing is, would the proper response have been for them to recuse themselves? They chose not to. They decided to move forward with their fraud and their scam thinking no one would ever find out about these connections. The reason for

recusal is because judge and attorneys have a duty of fairness when imparting justice as they are presiding over cases. My question to the disciplinary counsel is, "where my rights were and where was justice in this case?" No one ever mentioned to me that both men were from the same law firm. If someone would have mentioned that up front, I would have never allowed them to preside over this case to begin with knowing about their personal connections and financial interests. I was in the dark from the beginning of this case to the end. What I'd like to know from the counsel is, "was what happened here in the case legal? Is this the way our court system is set up- to harm people? Do we look out for greedy and jealous and forget the honest, hard working man?" I feel helpless here in this case. I want to know if there are laws out there to protect innocent people when something like this happens? Is there some sort of federal or state laws that hold judges and attorneys accountable for their actions in court? What they did to me and my family was unfair and unjust. I don't see how our laws would allow this to happen to anyone. It's simply wrong! Why would they not recuse themselves when there were grounds to do so? If there are no federal or state laws broken here, then what would you call this situation? I know for a fact that this case involved corruption within our court system. Is there some law against someone scamming you or trying to fraud you out of your own, hard earned money? If this is the way that our legal system works, then why even go to court? If you have crooked attorneys and judges on the same side, from the same law firm, there is NO WAY you can even expect to win a case like this with this type of corruption going on. I don't see how in this world our court and legal system would or could allow this to happen without someone not getting suspended or disbarred because of what they have done. They took the law into their own hands and did what they wanted to do because they don't have any oversight to watch them or monitor the case for what they've done. Because of what happened to me, I had to spend \$60,000.00 of my own money which should have never happened. It caused me to have to sell my home to pay for my attorney's fees. The Attorney General's office was the one that told me that I needed to contact the South Carolina Judicial Department- Office of Disciplinary Counsel.

I could not believe it when the judge said I had to pay back to the estate more than was even in the estate. Now what really gets me is, if the judge and the opposing attorney thought I was guilty in all of this, why would Mr. Campbell call my attorney at the time (David Smith) the very next week after the judge ruled on the case and tell my attorney that he would drop ALL CHARGES against me if I would be willing to give my part of the estate to his client. Now listen- what he is trying to say is... he is willing to DROP ALL CHARGES against me if I would give my part of the estate from the Will to his client. Now what I want to know from you, Disciplinary Counsel, is... does that sound like some kind of fraud or scam to you? The attorney is trying to scam or fraud me out of my money that my father left to me. Is that legal? The opposing attorney, Mr. Campbell (as well as my brother, Thomas P. Moore, who Mr. Campbell is representing), is willing to give up \$699,388.00 for the \$100,000.00 that my father left me in his estate. That tells me right there that someone KNOWS they did something crooked here. That also tells me that Mr. Campbell does not believe that I am guilty. He does not believe what the judge put against me in that order. What attorney (or client) in their right mind would be willing to give up \$699,388.00 if they felt like the opposing party was guilty? If he thought he had won this case fairly and there was no kind of corruption involved, they would have never called my attorney with this deal. My attorney told me that we were blindsided and the attorney for me said that I was ambushed in court. They both said there was no way that I could have won this case. I could not believe that the judge would allow one of my brothers to bring in evidence on what was supposed to be the final hearing in court. Again, to show you the corruption we have in our court system, why would the judge allow for

the opposing client to bring in more evidence to the court on the day of the final hearing? My attorney nor myself had never seen or heard of this evidence. We were unable to defend the evidence at this was all new information presented at the end. Phillip Moore brought into court on the final day of the hearing a black trash bag of evidence and asked his attorney to show all of the checks to the judge that he had brought in a trash bag. His own attorney, Cathy Elmore, told him that the judge was NOT going to allow new evidence to be brought into the court room at this point, on the final day of the ruling. Well, it turns out that the judge DID allow this evidence to be submitted. Not to mention that my brother went and saw and spoke to this judge in private before the court date. Phillip's attorney could not believe that the judge allowed this to happen. I can't believe that the judge allowed Phillip Moore to come to his chamber to discuss this case with him privately before the court date without an attorney present. What I'd like to know from the Disciplinary Counsel is... is all of this legal? If you say "yes" this is legal, then where are my rights in this case? You have a judge here allowing someone to come into his chamber to discuss a case in private and you have a judge allowing NEW evidence to be submitted on the final day of the hearing. You have a judge that is charging me for something that I have never seen in my life. Not to mention when they brought all of this into court, I never got to see it so that I could even attempt to defend it or explain my side. Then the judge ruled on the case without even asking me if I did this. The opposing attorney, Mr. Campbell, sat over there the entire time and laughed about it. He knew from the start that he had this case in the bag because there was no way that the judge was going to rule against him when they practiced law together for over 20 years or more and they were both from the Turner Padgett law firm. You mean to tell me that all of this is legal? This is the way that our court system is set up today? You know the judge was not going to rule against his partner. One question I would like to ask the Disciplinary Counsel is, "is this legal?" The judge was going to close this estate within 8-9 months until my brother walked into his chambers and told him that he didn't think he should close the estate until I paid all of the loans back to the estate, and the loans to Tammy Jackson. My brother, Phillip Moore, stated in his letter that he wrote Dennis Moore that the judge agreed with him. Now keep in mind, there was no attorney present at their private meeting. This one-on-one conversation between my brother and the judge should have never happened. No one ever told me that I could go sit with the judge alone and tell my side of the story. I did not even know you could walk into a judge's chamber and tell him your side of the story before going to court.

Sigh
Dennis Moore
personal representative

Do not ship liquids, blood, or clinical

RECEIVED

461

FedEx First Overnight®

09014
00020

FedEx Package
Express US Airbill
8152 6185

From: [Redacted]
To: [Redacted]
Address: [Redacted]

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Signature Required
Signature Required
Signature Required

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