In the Georgetown County Court of Common Pleas;
& in the United States Supreme Court of Law.

'The People', proceeding 'Ex-Rel', with-in our "State of South Carolina"; all by & through: Counter-Plaintiffs: Cynthia Moore, Charles Stewart, & our Natural Law Church, & others; as we each Constitute our Socially-Compacted Bodies-Politic; & this all Proceeding "In the Public-Interest", In Propria-Persona, & Sui-Juris; & proceeding similarly for "Georgetown County", & our "United States of America";	**Georgetown County Court of General Sessions, Case #: _____. (As Counter-Complaint, & In Response To: Georgetown County Court of Common Pleas, Case #: 2019-CP-22-00978.) United States Supreme Court of Law Case #: 2020-0004.**
Counter-Plaintiffs;	**Sworn Affidavit of Counter-Complaint & Suit, in the nature of: Quiet Title & Remove Cloud; & of Racketeering; Breach of the Peace; Extortion; Action for Public Nuisance; Fraud; Un-Just Enrichment; Trespass on the Case; Un-Conscionability; Maintenance; Damages; Injury to Person & Property; Violations of "County Law", Crimes Against the State & Public Justice, Conspiracy to Commit Crimes of Trespass, Unlawful Debt Collection, Robbery, Theft; & to Terrorize & En-Slave the Common-People of Georgetown County & the State of South Carolina; & all of which is Endangering the "National Security" of the Common People of the USA.**
Versus:	
"First Citizens Banking & Trust Company"; "Palmetto Heritage Bank & Trust"; "Crawford & Von Keller LLC"; & under each of these legal-fiction corporations, various unknown owners, directors, share-holders, & agents, who have been, or presently are, willfully Conspiring in the Furtherance of these organic-law based & Breach-of-the-Peace Common-Law Crimes;	
Counter-Defendants.	**Action-At-Law; Trial-by-Jury, Demanded.**

1a: <u>Preliminary Orientation-Note, to Parties Familiar with this Case</u>:

<u>The "Main Points</u>" which we Ex-Rel Plaintiffs present <u>in this "Complaint & Suit</u>", concerning our Claim of "Superior Title" & "Title of Possession", & "Seisin", is <u>More Effectively & Clearly Set Forth in this Version</u> of our Complaint; <u>between Pages ??? to ???, here-in</u>.

Other-wise than this brief introductory-note, directing those already familiar with this case to those specific & more concerning arguments & citations; these Plaintiffs here-under present our complaint in the more normal manner of addressing these legal concerns, as follows:

1b: <u>Opening Formalities</u>: <u>All Parties Take Note</u>:

All words presented here-in, are "Sworn To" be "True", by Co-Plaintiff Cynthia Moore. Similarly solemnly affirming his belief that these same words are "True", is here-in listed as Co-Plaintiff "Charles Stewart"; a second member of the the voluntary self-governing jural-society association, known as: the "Natural Law Church", & the "United States of America"; all by way of Socially-Compacted & "Ex-Rel" Relationship. Others may be added.

All parties take further notice, that, each & all of we Co-Plaintiffs do here-by commence &

proclaim this "Complaint at Law"; & we further proclaim that we are in the Full Possession of All of our Constitutionally-Guaranteed & Natural "Rights", especially concerning those of "Due Process of Law", aka: "Due Course of Law"; as well to as our similar Rights to the "Equal Protection of the Laws". Take notice also please, that, we Demand Respect for All of our Rights, at All Times; & we do Not Waive or relinquishing Any of our Rights, At Any Time, Nor for Any Reason.

Take further notice, please, also, that here-under; "No Presumptions" are to be taken against we Plaintiffs; including any to the effect that we have "Consented to be Governed" by any sort of a "Private Jurisdiction" which does not respect our common-law & natural-law based Rights, especially to have Disputes Resolved by "Due Course/Process of Law". We have Not "Contracted Away" any of our Rights. We have Not established any form of "Legal Nexus" or "Minimal Contacts" with any sort of "Private Jurisdiction", which would include any sort of a "De-Facto Governmental Jurisdiction"; all where-under might seem to be justified a secondary Presumption that we have agreed to Submit our Constitutional & Public Rights to any such Private & 'due-process dis-respecting' jurisdiction.

Those forms of presumptions seem to us to be epidemic in the modernly available "Civil Courts". This seems due largely from the Influences of Private Corporations, which are franchisees of our various jurisdictions of civil-government; & this includes the "Federal Reserve Banking System", & State "Bar Associations". In these available Courts, multitudes of un-knowing litigants seem to be routinely & secretively "Presumed" to have established entanglements with these sorts of "Private Jurisdictions". Here-under; these innocent people are secretively & routinely Presumed to have "Contracted" to be treated as what has been referred to as "Fourteenth Amendment Citizens"; &, where-under, those hapless litigants are routinely Obstructed from the Respect of All of their Natural, God-Given, & Constitutionally-Guaranteed "Rights". This is precisely the sort of a jurisdictional-entanglement that the powerfully influential Defendants named here-in are routinely using to advance the Racketeering scheme of which they are here-in later more fully accused.

We here-by demand that we do Not be treated in any of those constitutionally-lawless manners.

2: Jurisdiction: Jurisdiction is invoked at this time in the "Georgetown County Court of General Sessions"; with our notation that the Defendants in this case have already invoked a Complaint Against Us in the "Georgetown County Court of Common Pleas", under Case #: 2019-CP-22-00978. The reasoning why we have not simply filed a Counter-Complaint in the Court of Common Pleas, is because that Court seems to us to be a "Court of Limited Jurisdiction", which is Not Capable of Trying Cases Involving "Title to Real Property", Nor "Criminal Complaints", such as that being presented here-in.

While these Ex-Rel Plaintiffs are hopeful that this "Court of General Sessions" will process this Complaint in manners which promote the Justice & Lawful Resolution of this Dispute; these Ex-Rel Plaintiffs & our Common People are also Fully Aware that the Judges & other good Public-Servants that Court are modernly suffering under immense "Coercive Pressures" from those same "Powerful Private Interests", & their arms-length associates, which are generally complained of in this case. These "Coercive Pressures" on the Judges in this Court of General Sessions do seem to emanate from our National & State "Civil Governmental Jurisdictions", all in their inherent Roman-Empire-Law based "Top Down" & Authoritarian Modes of Proceeding, & in their manner of Delegating their Authority. That Top/Down "Civil Jurisdiction" is in Inherent & Fundamental "Opposition" to the more natural, organic, grass-roots, & bottom/up "Common-Law Jurisdiction", under which our Counties, Precincts, & Townships, are Constitutionally Designed to function; all as protected in our "South Carolina Constitution", as "Local or Special Laws", at "Article 3 Section 34", & "Article 8 Section 7".

We have constructed Documents, which explain more detail about this general Problem of

Criminally Lawless ‘Coercive-Pressures’ on the many good Judicial-Officers functioning under Franchise from State & National Civil/Municipal Jurisdictions; & also which Documents explain the Rights of our Common People to Form Our Own ‘Courts of Common-Law Jurisdiction’, & to there-by Break Free from the habitual ‘Obstruction of Justice’ & Corruption, which routinely manifests in the Roman-Law Based Courts of those Civil/Municipal Jurisdictions. These documents are web-linked here:

https://ConstitutionalGov.us/SupremeCourtOfLaw/Treason-USA/1-TreasonComplaint-ConstrctiveNotice-AllOfficers&Agents-V1.5.pdf

https://ConstitutionalGov.us/SupremeCourtOfLaw/Treason-USA/2-TreasonConstrctvNtc-CitationsSupportive-V1.2.pdf

https://ConstitutionalGov.us/SupremeCourtOfLaw/Treason-USA/3-TreasonRemedy-BuildingSelfGoverningCommonlawCommunities-V4.pdf

https://ConstitutionalGov.us/SupremeCourtOfLaw/Treason-USA/4-TreasonRemedy-Building-Communities-Citations-V1.3.pdf

(First-time readers to our web-site here may encounter an 'Error Message', which indicates that a "Security" Issue is present; but that message should present an Option & Button to Proceed in an "Advanced" manner; & (after perhaps a second but similarly simple step), new readers can then mouse-click, & Gain Full & Permanent Access to All Files on this web-site.)

Because of the Top/Down & Authoritarian Nature of our South Carolina State’s Civil-Governmental-Franchise, to the presumably honorable Judicial Officers having possible jurisdiction in this case; here-under, those Judicial Officers are inherently operating in an environment under which Law-Breaching ‘Coercive Pressures’ are rampant & epidemic.

And while Alternative Courts of “Common-Law Jurisdiction” are theoretically available under which our South Carolina Counties, Precincts, & Townships, as implied in our “South Carolina Constitution”, at “Article 3 Section 43”, & “Article 8 Section 7”; the sad fact, is that, these Local Communities do not yet contain sufficient numbers of people educated in the profound ‘Local Community Empowerment’ which is here-under lawfully available to them.

Here-under, we are “Invoking in Parallel”, a similar more natural, organic, grass-roots, & bottom/up “Alternative Court System”, which is known as the “USA Supreme Court of Law”. Here-under; & in our efforts to more quickly & efficiently secure “Justice” in this case, Socially-Compacted & Organic Ex-Rel Members of our USA National Organic Body-Politic have acted (relying largely on efforts from the Plaintiffs, by “necessity”), to post on the internet, our ‘Court of Record” for this Case, including files which can easily be reviewed by the common Public, as web-linked here:

https://ConstitutionalGov.us/SupremeCourtOfLaw/Cases/SouthCarolina/GeorgetownCounty/ExRel-CynthiaMoore-Vs-FirstCitizensBanking&TrustCompany

Here-under; we Ex-Rel Co-Plaintiffs find “Justification”, in “Invoking in Parallel” with our local Georgetown County “Court of General Sessions”, Also Invoking the Jurisdiction of our newly-formed “United States Supreme Court of Law”. As explained in the earlier web-linked documents, here-by, we expect to Follow Constitutional “Due Process of Law”, & assemble Juries, & provide “Justice”, in manners which are much more quick & efficient than that which the more popular Municipal/Civil Franchised Courts are capable of accomplishing.

Any parties having objection to our proceeding in this manner, please notify us of the nature of your objections, including your “Basis in Law” there-fore; & please do so in a Timely manner.

Here-under; we State Ex-Rel Plaintiffs expect to find greater opportunity for escaping the afore-mentioned "Coercive Pressures" which saturate the local Circuit Court & routinely obstruct the Cause of Justice for the People of our County, State, &Nation. This will allow our Common People to follow "Due Process of Law" in much more quick & un-adulterated manners; & it will there-by bring true Justice & Peace to our Common People. This is all as was "Originally Constitutionally Intended" by the Framers of our State & National Constitutions; because, it all allows for our Common People to gain speedy access to Constitutional "Organic-Law". This is all admittedly quite un-fashionable; but it represents a potential vast "Improvement" for escaping the "Coercive Pressures" which are so rampant in the Circuit Court; & the Common People of our County feel "Justified" in our efforts to secure "Justice" by invoking this parallel jurisdictional process.

Further here-under; Jurisdiction is Invoked under our Public & General Common-Law, as Guaranteed to us at (but not dependent for ultimate authority on) the our State & National Constitutions; & also; as provided for us at (but not dependent on) many South Carolina & Federal Statutes, all of which may be more specifically identified as these Plaintiffs are so able. Also as provided for us in the South Carolina statutes and laws governing Corporations, Contracts; and our State version of the Uniform Commercial Code; and as provided under general International Law; & also as the following reputable citation provides:

"When the Court is one of General Jurisdiction, its Jurisdiction is presumed and need not be expressly asserted by the plaintiff; …"

"Common Law Pleading"; Koffler & Reppy, West Publishing Company, St Paul, Minnesota; 1969. Page 69.

3: The Property: which is being brought into controversy through this complaint is commonly known by its street-address, of: "561 Kings River Road", in "Georgetown County", De-Jure/Lawful Jurisdiction, (& in the city of Pawleys Island, [29585]), & all in our de-jure & constitutional "State of South Carolina".

4: The Plaintiffs: in this action are natural-persons, and the legal-fiction non-profit corporation which is organized to further our "Christian Ministry", of caring for the poor & homeless, one "Natural Law Church", here-in-after frequently referred to as "NLC", which has been formally "Incorporated" in-to the constitutional "State of Oregon", by & through the Corrected "Corporation Registry Number" of: "1151541-97". Besides our recognition here of being collectively "Incorporated" in-to the Constitutional "State Of Oregon", by & through this "Secretary-of-State" filing; we are also more Organically "Incorporated" here-in, because this complaint is of direct "Public Interest" for Our Common People who organically Constitute the "State of South Carolina", as well as our entire "USA". Here-under, we invoke our constituent/component-member Right to "Speak Law" in the Name & on the Behalf of the People of each of these organic body-politic community jurisdictions. Our names are "Cynthia Moore", "Charles Stewart"; & numerous "Ex Rel" others, who's names we expect to add, as opportunity allows. The co-plaintiffs named thus far here-in, maintain a shared mailing-address at the property in question in this case; at: "561 Kings River Road", in "Georgetown County", De-Jure/Lawful Jurisdiction, (& in the city of Pawleys Island, [29585].

Cynthia Moore is our main natural-person co-plaintiffs who is exercising our collective "Title of Possession"; & we all also claim "Title by Contract" of this property. This includes our larger communities of our "Natural Law Church", & our Constitutional "State of South Carolina", & "Georgetown County". This complaint is "In the Public Interest", for all of these larger communities; & here-under this also includes the Public Interest of our U.S.A., as well as this entire earth.

5: **<u>The Defendants</u>:** in this action, are both natural-persons & Corporate Legal-Fictions. The natural persons involved here are using their legal-fiction names in their efforts to secure "Limited Liability" from the common-law "Breach of the Peace" based "Crimes" which they are here-in accused of routinely committing against our common people, in all of our larger public communities.

The main legal-fiction entities here named are:

"First Citizens Banking & Trust Company";

"Palmetto Heritage Bank & Trust";

"Crawford & Von Keller LLC"; P.O. Box: 4216, Columbia, South Carolina, [29240]
803-790-2626 / court@crawfordvk.com

****

<u>The Situational/Historical "Facts" which Lawfully "Justify" this Complaint & Suit</u>:

6: On or about the date of ??????????????, Robert L. McDonald, completed acts which gave color of legitimacy to a presumption that he was authorizing here-in referenced Co-Defendant "Palmetto Heritage Bank & Trust" Company, to secure an Interest in the Real-Property which is here-in asserted to suffer under "Disputed Ownership". Color of Legitimacy was further there-by given, to a presumption that, a loan of money with a value denominated in modern "Federal Reserve Note Dollars" in an amount of approximately $????????????. At that same time, Robert L. McDonald also completed acts which gave color of legitimacy to a "Promissory Note" in this same amount of approximately $?????? .

7: Here-under; Defendant "First Citizens Banking & Trust Company" now seems to have assumed Palmetto's interest in this real-property. The generally deceptive, unconscionable, & usurious financial actions of which Palmetto is here-in accused of originally engaging in, when they originally gained their interest in the property in question in this case, has Similarly Clouded & Compromized the interest gained by all "Successors in Interest" to Palmetto; including especially Defendant "First Citizens Banking & Trust Company".

8: The promissory note document which Robert L. McDonald then & originally placed writing on for this loan was accompanied by actions of either direct verbal affirmation or omission by one or more of the above-named Defendants, which lead Robert L. McDonald to believe that Palmetto was gaining only that reasonable rate return of interest upon the Federal Reserve Notes that Palmetto was there-by contracting to part with.

9**:** During the time-period surrounding this date, Palmetto was functioning under Reserve Requirements that their Negotiable Instruments be stood behind by themselves, by their being ready to present Federal Reserve Notes to the public only up to approximately 1/10th or 10% of their outstanding debts, here-in-after referred to as their "Fractional Reserve Requirements". Due to the un-constitutional monopoly over our American and South Carolina Monetary Systems, the Federal Reserve Banking system has effectively distributed Franchises to almost every banking or lending company in the USA and South Carolina, including Palmetto, & "First Citizens Banking & Trust Company".

10: Here-under, "Un-Equal Protection of the Laws" are dispensed amongst the Franchisees of the Federal Reserve Banking System; and where-under "Federal Reserve Notes" are routinely "Leveraged" by these powerful banking institutions. Here-under; these banking institutions to routinely gain approximately Ten/10 Times the value of the Federal Reserve Notes that they actually part with, in comparison to the value attached there-to in the public market-place, and by the common People of

America and South Carolina. The Federal Reserve Bankers benefit from this arrangement because they do not have to be directly involved with the millions of individual loans in this nation, but the smaller banking franchisees, such as Defendant Bankers named here-in, obediently handle those burdens for their masters. These smaller banking franchisees benefit, because they are allowed to "Leverage" the actual Federal Reserve Notes in their possession by "Creating Money Out Of Thin Air". Due to their advantageous monopoly-franchised position in the market-place, these smaller bankers are only limited by the "Reserve Requirements" of approximately 10%, under which they function.

12: During the above stated time-period of this loan, it was a strategically-beneficial and common practice for Defendant Banking Institutions to "Leverage" their Required Reserves of Federal Reserve Notes as much as they could, and right down to only their actual "Reserve Requirement Level", in order that they might Gain the Maximum amount of Profits possible from the Federal Reserve Notes they were required to hold.

13: On or about the date of ??????, Richard McDonald agreed to repay to the holder of the promissory note the amount listed there-in as having been lent to him, by repaying with money which was to him and all common Americans equally as precious and at par value to All About as Federal Reserve Notes. These are the terms of the promissory-note/contract which Richard McDonald reasonably believed in good-faith that he was entering into.

14: During this time period, Palmetto Created Negotiable Instruments and/or Electronic Credits which they then lent to Richard McDonald, but which were only of approximately 10% of the value to Palmetto as were the Federal Reserve Notes which were then in Palmetto possession. Either by direct verbal affirmation, or by omission, Palmetto lead Richard McDonald to believe that Richard McDonald was being loaned money that was to Palmetto equally as precious and functioning at par value with Federal Reserve Notes, and that Palmetto would only be receiving the reasonable return in "Interest" on that loan that was indicated in the contract document.

15: On or about the date of ?????????, Richard McDonald received from Palmetto, or had disbursed on his behalf to third parties, approximately $???????, in the form of Negotiable Instruments and/or Electronic Credits, which Palmetto had "Created out of Thin Air", and concerning which Palmetto had Only Incurred the Singular Liability of Holding in Reserve approximately Ten Percent, aka: 10 /% , of that amount in so-called "Federal Reserve Notes", the total of which would there-by calculate to be approximately $???????? .

16: The Negotiable Instruments and/or Electronic Credits that were issued and put into circulation in the marketplace, on account of this newly contracted indebtedness of Richard McDonald, were eventually circulated back to Palmetto, by some party or parties unknown, who were asking for some kind economic value from Palmetto, in return there-on. When all of the Fractionally Reserved Negotiable Instruments and/or Electronic Credits which were issued by Palmetto finally came circulating back to Palmetto for payment, Palmetto frequently just issued more credits which they again "created out of thin air", and so Palmetto then actually paid out less than 10%, or about $????, in so-called "Federal Reserve Notes", as they and their masters label and refer to them as, and which may also be considered to be their "Ultimate Unit of Economic Accounting".

17: Due to their Fractional-Reserve "Leveraging" Practices, and when this loan was issued to Richard McDonald, Palmetto officers in their corporate capacity were not standing ready to redeem the entire 100% face value of this and all of the other debts which they then had in circulation at that time, and which they had contracted to redeem. During this time, Palmetto's corporate executives were not standing ready to redeem and pay-out in their "Ultimate Unit of Accounting" of so-called "Federal Reserve Notes", any amount more than Ten-Percent, aka: 10%, of their outstanding and circulating Negotiable Instruments and Electronic Credits. This was true, because, Palmetto was striving to

achieve Maximum Profits with-in the parameters of their “Fractional Reserve Requirements”. During this time, Palmetto's executives knew that if they had an unexpectedly high demand for Federal Reserve Notes form those people making presentment of Palmetto's debts, that Palmetto could quite quickly exercise their Privileged Franchise to go to the Federal Reserve Bank's “Discount Window”, and there-in secure an “Un-Leveraged Loan” of the extra amount of “Federal Reserve Notes” they needed to meet the demands of the people who wanted payment in that “Ultimate Unit of Accounting” of so-called “Federal Reserve Notes”.

18: The payments which Richard McDonald had made since the date of the loan in question has more than Completely “Paid Off” the True Amount of Federal Reserve Notes that Palmetto actually parted with due to this loan.

19: Any lawful “Interest” agreed to upon for the true amount of Federal Reserve Notes actually parted with by Palmetto was also paid off by Richard McDonald.

20: At the time when this loan was issued, Palmetto's officers, in their corporate capacity, intended to receive a greater sum or value in “Interest” by a multiple of at least Ten Times, than that which Palmetto had contracted to receive, all as calculated based on the actual use of the Federal Reserve Notes which Palmetto had actually “Placed In Hazard”. This was also an amount of interest that is in excess of that generally recognized as being “Usurious”, and it roughly approximated “100% Per Year” in Interest, as calculated based on the actual Federal Reserve Notes which Palmetto actually parted with, as the direct result of this loan.

21: As the direct result of this agreement for the loan of approximately $??????? by Palmetto to Richard McDonald, a paper document was issued which purported to obligate Richard McDonald, and his successors in interest, we Plaintiffs, to repay the full loan with amounts money of which, to Richard McDonald and his successors in interest, was equally as precious and functioning at par value with Federal Reserve Notes.

22: As the direct result of the agreement for this loan, there was a paper document composed which was entitled similarly as a “Mortgage” document; and which was intended there-by, to cause the Title of the Real-Property which is in controversy in this case, to be used as “Security” for the Re-Payment of the Debt which Richard McDonald had colorably obtained from Palmetto. This “Mortgage” document, was issued as the direct result of a presumed “Meeting of the Minds”, that Palmetto was acting in Good Faith to issue this Loan to Richard McDonald; and there-under for Palmetto to Secure the repayment of the indebtedness evidenced by Richard McDonald’s Promissory Note.

23: Palmetto seems to have assigned all of its interest, as related to this “Mortgage”, to Defendant “First Citizen’s Banking & Trust Company”; & there-by, First Citizen has since been colorably assigned the Promissory Note document & a Beneficial Interest in the Mortgage document, which were originally issued by Richard McDonald to Lender Palmetto.

24: First Citizen has habitually & now presently does continue to use similarly unconscionable & lawless Fractional Reserve Leveraging Practices, as did Palmetto in their original actions which have resulted their gaining of these commercial assets from Palmetto.

25: More specific to this case; First Citizen, in their actions, has habitually & now presently does continue to use similarly unconscionable & lawless Fractional Reserve Leveraging Practices as did Palmetto. Those lawless practices have resulted in First Citizen gaining from Palmetto their interest in the Promissory Note and Deed of Trust Contracts which Richard McDonald placed writing on, & through which First Citizen now claims an interest in the property in controversy in this case.

26: Neither Defendants Palmetto, nor First Citizen, can document, that, including them & Palmetto collectively, that they actually parted with the full amount of Federal Reserve Notes listed in

the promissory note related to this case, of approximately $????????????, when they obtained their interest in the Promissory Note and Mortgage which are in question in this case.

27: Neither Defendants Palmetto, nor First Citizen, can document, that, including them & Palmetto collectively, that they actually parted with any amount more than approximately $???????? in Federal Reserve Notes when they obtained their interest in the Promissory Note and Mortgage which are in question in this case.

28: Neither Defendants Palmetto, nor First Citizen, can document, that, including Palmetto collectively, that they actually parted with Any amount of Federal Reserve Notes, when they obtained their interest in the Promissory Note & Mortgage which are in question in this case.

29: Neither Defendants Palmetto, nor First itizen, can document, the actual true & accurate "Interest Rate" which they actually gained, as calculated based upon the actual amount of Federal Reserve Notes which they, including Palmetto collectively, actually parted with, when they obtained their interest in the Promissory Note & Mortgage, as are now in question in this case.

30: Defendants Palmetto & First Citizen, collectively, actually gained an amount of yearly "Interest" on the amount of Federal Reserve Notes which they actually parted with as the direct result of this loan, in a vast and un-conscionable Excess of the amount which was actually contracted for in the promissory note.

31: Defendants Palmetto & First Citizen, collectively, actually gained an amount of yearly "Interest" on the amount of Federal Reserve Notes which they actually parted with as the direct result of this loan of approximately ten times the interest rate listed in the promissory note related to this case.

32: Here-in named Defendant First Citizen was similarly privileged as was Palmetto, when First Citizen was assigned the Promissory Note and/or Beneficial Interest in the Mortgage to this property. This is true because the credits with which Defendant First Citizen used to purchase their interests in these documents, was of only approximately 10 % of the value to them as were the "Federal Reserve Note" based ultimate-economic-accounting-units, which common Americans and South Carolinianians, such as Robert McDonald, & these Plaintiffs, are disenfranchisedly and un-fairly forced to seek out, in our handicapped-efforts to re-pay of these loans.

33: Here-under, Defendants Palmetto & First Citizen were each allowed to purchase this Promissory Note, and its accompanying and related beneficial interest in the Mortgage to this property in this case, with funds which were only 10% as valuable to them in comparison to the "Federal Reserve Note" based ultimate-economic-accounting-units which Richard McDonald & these Plaintiffs were & are being forced to seek out.

34: The Corporate Officers in control of the Legal-Fictions of Palmetto & First Citizen, All "Knew" that they were competing for this interest in this property of these Plaintiffs in an "Un-Equal" and "Un-Conscionable" basis; yet they did not care, because they were Exclusively Concerned about "Ultimate Profits", and they were not concerned about good-faith or conscience-bound standards of behavior in their relations with any members of the American or South Carolina Public, with whom they were then doing business, including Richard McDonald & these Plaintiffs. This statement specifically includes Defendant "First Citizen", who presently claims an interest or estate in this property, and which interest is adverse to that of these Plaintiffs.

35: The interest or estate claimed in this property by First Citizen, is 'invalid and un-lawful', because, the Promissory Note and the Mortgage through which they derive their interest in this property are fraudulent, usurious, unconscionable, and there-by un-lawful.

36: The history between the Defendants, and Richard McDonald & these Plaintiffs, shows that Richard McDonald & these Plaintiffs have been treated in un-ethical and manipulative manners. The honest efforts of Richard McDonald & these Plaintiffs to address the issues involved with the

Promissory Note related to this case, have been met only with elitist, aristocratic, and arrogant indifference or disdain. All of the specific instances of this un-ethical, bad-faith, and "Un-Clean-Hands" behavior are not fully presented here-in, because of the Defendants refusal to engage on the substantive issues in this case, & because of artificially imposed "time constraints" which cause we Plaintiffs to reasonably fear an unlawful detainer action being lawlessly brought against us, if we do not file this complaint promptly.

37: Near the date of 2020-August-28, Defendant "Crawford & Von Keller LLC", did act, by and through its paralegal assistant "Kasey Richardson", to issue a document entitled "Master in Equity's Order and Judgement of Foreclosure and Sale" concerning the property in question in this case; & which seems to be a Proposed Order for an Equity Master Magistrate Judicial Officer to sign, but which was then not yet signed by any such Judicial Officer.

38: In the afore-mentioned "Order" document, Defendant Crawford & Von Keller did declare that their "Order & Judgement of Foreclosure & Sale" would occur on the date of 2020-October-05, & that the total amount due on the promissory note was $276,468.05 .

39: On a previous date, ???? , Co-Plaintiff Cynthia Moore did receive assignment of ownership of this property from Richard Mcdonald.

40: On the date of 24-September-2020, Co-Plaintiff Charles Stewart, acting on behalf of the "Unites States People's Social Justice & Credit Church Court & Treasury", aka "USPSJCCCT", did issue a negotiable instrument & valuable consideration to Co-Plaintiff Cynthia Moore"; in exchange for a similar negotiable instrument from Cynthia Moore. Both of these negotiable instruments were issued in the amount of $320,000.00 . The negotiable instrument which was given to Co-Counter-Plaintiff Cynthia Moore was made out for payment: "to the order of: 'Cynthia Moore'; & then to 'First Citizens Banking & Trust Company', & when endorsed by officers there-in, then: Pay to any Bearer:".

On the date of 28-September-2020; Co-Counter-Plaintiff Cynthia Moore Endorsed the back of this negotiable instrument, all so that the only signature there-after needed in order for the instrument to become payable to any bearer would be a signature from an officer from First Citizens Banking & Trust Company.

Previously filed "Exhibit A" is a copy of this negotiable instrument.

41: On the date of 28-September-2020, Co-Counter-Plaintiff Cynthia Moore did send by certified UPS mail delivery, the afore-mentioned negotiable instrument, in the amount of $320,000.00, to the Attorneys for Co-Counter-Defendant 'First Citizen', who are also named here-in as Co-Counter-Defendants 'Crawford & Von Keller, LLC'. Included in that mailing were a number of documents evidencing the legitimacy of the claims of ownership of this real-property by Co-Counter-Plaintiff Cynthia Moore, & also there-in included was a Cover Letter from Ms Moore, there-in explaining that the tendering of the commercial instrument to the Co-Defendants named here-in had lawfuly payd or discharged the debt associated with this real-property, & thatm, here-under, they should promptly issue documents to Co-Counter-Plaintiff Moore, there-in releasing all of their interest in this real-property to Ms Moore.

A Copy of this Cover-Letter is attached here-to as 'Exhibit B'.

Copies of other documents them also mailed to Co-Counter Defendant Crawford & Von Keller are also attached here-to as consecutively identified Exhibits.

42: The aforementioned delivery of the afore-mentioned negotiable instrument, along with

the Cover Letter & other related documents; has resulted in the lawful payment or discharge all of the out-standing debts which any of the Counter-Defendants named here-in might claim to be owed under the promissory note related to the real-property in question in this case, as originally issued by Richard McDonald.

****

43: On the date of 1-October-~~2015~~; phone & email contact was made with QHLSCW, & there-by to their attorney "Robert McDonald". ~~QHLSCW attorney McDonald there-in indicated that he was strongly inclined to believe that Defendant "Select Portfolio Servicing Inc."~~ would be refusing to accept the negotiable instrument which we Plaintiffs had tendered to them & the other Defendants in discharge of the debt which was then associated with the property in dispute in this case.

44: On the date of 2-October-~~2015; email contact was made with QHLSCW attorney McDonald; & attorney McDonald there-in referenced QHLSCW~~ with his wording that: "The Trustee is rejecting the negotiable instrument as only certified funds are able to accepted ...".

48: By their acts of Refusal to Release their claimed interest in this property to these Plaintiffs; the Defendants/Trustees …… have committed a "Breach of their Fiduciary Duties" to we Ex-Rel Plaintiffs, as we are the "Successors in Interest" to the "Estate of Richard McDonald".

50: In the light most favorable to the Counter-Defendants, they have only a "Security Interest" in the property in question in this case; & they have no lawful basis or claim up-on which to "state a cause of action" for having these Plaintiffs forcibly removed from this property in question in this case. These realities of true "Law" are likely codified in South Carolina Statutes, similarly as in Oregon Statute, which reads as follows:

ORS: 164.105: Right of possession. … (3) … a person in lawful possession of property shall be deemed to have a right of possession superior to that of a person having only a security interest in the property, even if legal title to the property lies with the holder of the security interest pursuant to ... security agreement.

51: Because of the modern dysfunctionality of the civil court system, & the heavily corrupting influence of the money-power; modern Judges & Sheriffs-Deputies are suffering form "Coercion", economic & other-wise, as recognizable under Oregon Statute at ORS 161.275 . The Counter-Defendants named here-in are franchisees &/or agents of this very same powerfully corrupting money-power; & they are engaging in the very same form of Lawless "Coercion" referenced in ORS 163.275 .

52: Here-under; these very same Defendants are scheming at this very moment to use these powerfully coercive forces against the good sheriffs deputies & judges of this county, all so-as-to cause the criminally lawless mis-use the force of the county sheriffs department to have these Plaintiffs forcibly ejected from our quiet & peaceable possession of the real-property in question in this case.

~~~

This ends the list of specific situational/historical "Facts" which we Plaintiffs are here-in presenting before these courts.

~~~~~~

Broader Issues Concerning Fundamental Principles of Lawful Procedure, Vs Procedural Confusion:

53: In efforts to paint a complete picture for all Judicial Officers honorably concerned with this case; a Citation is here presented, which provides valuable insight into the Constitutionally-Preferred Method of "Dispute-Resolution" in our American Constitutional System of Government. This Citation emphases the importance of "Due Process of Law", under the "Rules of the Common-Law", as respectively referenced in the Fifth & Seventh Amendments to our 'United States Constitution' document. This Citation also points out, well, that there is a very ancient & Opposing Body of so-called "Laws" in place, which are continuously battling against our Anglo/American 'Common-Law', from behind the scenes, and with powerful supporters; all of which are derived from the very powerful & ancient Roman System of so-called "Civil-Law", & which is more accurately identified as "Municipal-Law".

These Main 'Opposing Bodies of Law' are generally written about by advocates of the Roman Municipal/Civil system of laws; & here-under, in their efforts to further the Confusion of our common people, they have created a Separate Field of Study, which they refer to as "Conflict of Laws".

https://www.law.cornell.edu/wex/conflict_of_laws

This "Conflict" is very ancient, reaching back literally for thousands of years. It has Profoundly Influenced our modern American concepts of "Constitutional-Law". This "Conflict" between the so-called "Civil-Law", and the "Common-Law"; is also between Individual People who advocate that our American People view one or the other of those diametrically-opposed bodies of law as "Constitutional". In our Citation concerning all of this, these points are explained in this text composed in 1871 under the title of "Of the Civil-Law and the Common-Law", by a Professor of Law at Columbia College, named Samuel Tyler II,D.; as follows:

"**There have grown up in the history of nations only two great systems of law, the civil law of ancient Rome, & the common law of England. All the most civilized nations in the world are governed by either of these two great schemes of justice. Though the civil law and the common law have much in common, yet in many important particulars they are the opposites of each other. In the course of his studies, the student of law finds so much said, in an incidental way, about the civil law, that is calculated to mislead his judgment in regard to the true character of that scheme of justice, that it is important, at the outset of his walks over the fields of the common law, to give him some account of the civil law, and point out in what it differs essentially from the common law. This is a matter of much importance to every student who aspires to a comprehensive and enlightened knowledge of jurisprudence. ...**

... it was under the empire, when the glory of the republic was gone, that the jurists attained their eminence, and in fact became the architects of the great system of Roman law. ... Oratory was no longer, as it had been during the glorious period of the republic, the great art by which men rose to eminence in the state. Its voice was now silent; when to speak of the rights of Roman citizens was treason. …

The administration of the law, too, was subordinate to the imperial authority, not only in theory but in practice, the courts being organized accordingly. Under the republic, the courts were open to the public in both civil and criminal trials. Under the empire, open courts disappeared, and an appeal lay in all cases to the emperor in his imperial court. Thus a perfect system of despotism, disguised under forms of law, was built up on the ruins of the republic. …

If we now turn to the common law of England, we will find that, as far as administrative principles and forms of procedure are concerned, it is the opposite of the Roman civil law as it was molded under the empire. The principle which, in the practical administration of the two systems, marks the primary essential distinction between them, is the relative obligatory force under them of precedent or former decisions. Under the common law, former decisions control the court unconditionally. It is deemed by the common law indispensable that there should be a fixed rule of decision, in order that rights and property may be stable and certain, and not involved in perpetual doubts and controversies.

Under the civil law the principles is different. Former decisions have not so fixed and certain an operation, but are considered as only governing the particular case, without establishing as a settled rule the principle involved in it. When a similar case occurs, the judge may decide it according to his personal views of the law, or according to the opinion of some eminent jurist. …

Let anyone, who wishes to examine a specimen of this perplexity in regard to a fundamental classification which the civilians make of laws into personal statutes and real statutes, refer to the opinion of the supreme court of Louisiana, by Mr. Justice Porter, in Saul v. His Creditors, in 17 Martins' Reports. After referring to the jurists of the different European countries who have treated of this distinction, Justice Porter says:

"The moment we attempt to discover from these writers what statutes are real and what personal, the most extraordinary confusion is presented. Their definitions often differ; and, when they agree in their definitions, they dispute as to their application."

And Mr. Justice Story, in his "Conflict of Laws," when speaking of the civilians who have treated of the subject of his book, says:

"The civilians of continental Europe have examined the subject in many of its bearings with a more comprehensive philosophy, if not with a more enlightened spirit. Their works, however, abound with theoretical distinctions, which serve little purpose than to provoke idle discussions and metaphysical subtleties, which perplex, if they do not confound the inquirer. * * *

Precedents, too, have not, either in the courts of continental Europe or in the judicial discussions of eminent jurists, the same force and authority which we, who live under the influence of the common law, are accustomed to attribute to them; and it is unavoidable that many differences of opinion will exist amongst them, even in relation to leading principles." Such is the fluctuating wind of doctrine with which the judicial mind is liable to veer under the civil-law institutions where precedents have but little force. …

The common law, in broad contrast to the civil law, has always wholly repudiated anything as authority but the judgments of courts deliberately given in causes argued and decided. "For (says Lord Coke, in the preface to his 9th Report) it is one amongst others of the great honors of the common law that cases of great difficulty are never adjudged or resolved in tenebris or sub silentio suppressis reationibus, but in open court: and there upon solemn and elaborate arguments, ... where they argue ... seriatim, upon certain days openly and purposely prefixed, delivering at large the authorities, reasons, and causes of their judgments and resolutions in every such particular case, ... a reverend and honorable proceeding in law, a grateful satisfaction to the parties, and a great instruction and direction to the attentive and studious hearers."

Nothing less elaborately learned & cautiously considered than such a judgment of a court has a legitimate place in the common law. By such adjudication has that great system of jurisprudence been built up. The opinion of no lawyer has a place in the system of common law. And this wise principle of the common law is never lost sight of by those bred in its spirit. When Lord Coke wrote his commentaries upon certain statutes of England, from Magna Charta to Henry VIII, which are called his II Institutes, he did not give his personal opinions of their meaning, but gave the judicial interpretations of them, which had been made. In the conclusion of the preface to the II Institutes he says:

"Upon the text of the civil law there be so many glosses and interpretations, and again upon those so many commentaries, and all written by doctors of equal degree and authority, and therein so many diversities of opinions, as they rather increase than resolve doubts and uncertainties, and the professors of that noble science say that it is like see full of waves."

"The difference, then, between those glosses and commentaries are written by doctors, and which be advocates, and so in a great manner private interpretations; and our expositions or commentaries upon Magna Charta and other statutes are resolutions of judges in courts of justice in judicial courses of proceeding, either related and reported in our books or extant in judicial records, or in both, and therefore, being collected together, shall ... produce certainty, the mother and nurse of repose and quietness."

Such is the doctrine of the common law! Nothing but the solemn voice of the law itself, speaking through its constituted tribunals, is of any judicial authority. And how august is that authority, reposing as it does upon the solemn decisions of courts which have administered justice in the very same halls for nearly eight hundred years! In vain shall we search the history of nations for a parallel to this stability of law amidst the fluctuating vicissitudes of empire. It is this stability of law, ruling over the prerogative of the crown and administering equal justice to the high and the low through so many centuries, that vindicates the "frame and ordinary course of the common law" to the consideration of the present times.

It is this primary difference in the principles of practice, under the two systems of law, which gives to the common law its great superiority over the civil law, as a practical jurisprudence regulating the affairs of society. It has the great advantage of producing certainty in regard to all rights and obligations which are regulated by law. But, above all, it excludes private interpretations and controls the arbitrary discretion of judges. In the common law the principles of interpretation are fixed and certain. Rules of interpretation were early adopted, and have never been departed from. Other rules from time to time have been adopted, but when once introduced into practice they become precedents."

Note-worthy points to summarize here-from are that: "Common-Law" is said to produce a process where "rights and property may be Stable and Certain, and not involved in perpetual doubts and controversies"; and that the opposing Roman-based "Civil-Law" seems Purposefully Designed to generate "Confusion" and "Despotism".

The first four web-links in this document, near the top of page-3 here-in, link to documents which explain this entire "Conflict" in much greater detail; & the above & some below Citations are repeated there-in.

54: In efforts to bring all of these citations in-to a sharp focus on the case involved here-in, the Counter-Defendants & their accomplices here have been repeatedly using obscure legal technicalities, in their efforts "To Create Confusion". Their Malicious-Intent here, is that "The Money Power" be allowed to continue in its practice of getting its way in the "Civil Courts" of this County & State, by "Mis-Prioritizing" Equitable/Administrative/Summary/Military Process, Over our Common People's Constitutionally-Guaranteed Rights to "Due Process of Law".

This concern is especially exacerbated under the additionally complicating factors of the so-called "Merger of Law & Equity". Here-under; these Counter-Plaintiffs have come to believe, that, with-in the "Rules of Civil Procedure", what fashionably passes in the Courts of our Constitutional State of South Carolina as modern "Real Property Law", has been maliciously mis-used by the Defendants & their cohorts to shift the Court's focus away from its "Primary Constitutional Duties", under "Public Law"; & over to its more fashionable & convenient focus in the realm of Commercial & Contract Law, under "Private Law".

Further here-under; the else-where referenced "Corporate Money-Power" hires big-gun Law-Firms (such as that of the Counter-Defendants), where-under the same "Mass of Procedural Confusion" is routinely used with military efficiency, in maximizing opportunities for the mega-wealthy to lawlessly pillage & plunder our State's Common People. It is easy to here-under be lead to the conclusion that those communities where-in that corporate money-power congregates, do fashionably view these same "Fundamental Principles of Law", with "Contempt". "Law", properly defined; is the Worst Enemy of those mega-wealthy private corporate conspirators; & here-under they naturally Conspire to develop Mechanisms to Evade being held to account under the "Public Laws" of this Constitutional State.

These same sorts of Diversions from the honorable standards have become quite fashionable

under the "Civil Jurisdiction" of our nations modern courts; as shown by the following citation:

"U.S. Senate Report 93-549; … on … the National Emergency. … A majority of the people of the United States have lived all of their lives under emergency rule. For 40 years, freedoms and governmental procedures guaranteed by the Constitution have, in varying degrees, been abridged by laws brought into force by states of national emergency. The problem of how a constitutional democracy reacts to great crisis, however, far antedates the Great Depression. As a philosophical issue, its origins reach back to the Greek city-states and the Roman Republic. And, in the United States, actions taken by the Government in times of great crisis have - from, at least, the Civil War - in important ways shaped the present phenomenon of a permanent state of national emergency.

American political theory of emergency government was derived from John Locke, the English-political-philosopher whose thought influenced the authors of the Constitution. Locke argued that the threat of national crisis - unforseen, sudden, and potentially catastrophic - required the creation of broad executive emergency powers to be exercised by the Chief Executive in situations where the legislative authority had not provided a means or procedure of remedy. Referring to emergency power in the 14th chapter of his *Second Treatise on Civil Government* as "prerogative", Locke suggested that it:

... should be left to the discretion of him that has the executive power ... since in some governments the lawmaking power is not always in being and is usually too numerous and too slow for the dispatch requisite to executions, and because, also it is impossible to foresee and so by laws to provide for all accidents and necessities that may concern the public, or make such laws as will do no harm, if they are executed with an inflexible rigour on all occasions and upon all persons that may come in their way, therefore there is a latitude left to the executive power to do many things of choice which the laws do not prescribe. ... "

https://en.wikipedia.org/wiki/Senate_Report_93-549
http://www.ncrepublic.org/images/lib/SenateReport93_549.pdf
http://barefootsworld.net/war_ep1.html

Please note in the opening-line of the above-quoted text, that: "freedoms and governmental procedures guaranteed by the Constitution have, in varying degrees, been abridged by laws brought into force by states of national emergency." Please note that constitutionally-guaranteed "Due Process of Law" is a "Governmental Procedure". Please note that the words "Process" & "Procedure" are both phonetically & etymologically related.

This Problem goes much deeper than the issues focused tightly around the real-property controversy in this specific case. This case involves numerous Complaints which are in the "Public Interest". Perhaps the single most significant "Public Interest" issue that this case raises, is what has been described by fashionably reputable law scholars as a "War on the Judiciary", mostly by Executive Officers, but also by the largely dysfunctional "Legislative Assemblies"; & certainly concerning the mega-wealthy & "Wall Street" centered "Private Banking Organizations". The method of Payment that we Plaintiffs have used to "Discharge the Debt" associated with our legitimate purchase of this real-property, has the potential to Place the entire 'Banking Industry' firmly Under the Control of the Judicial Powers which are Described in the Sixth & Seventh Amendments to our US-Constitution, & there-by to massively De-Centralize our entire American Economic-System, right on down to our local self-governing "Districts" or "Precincts"; & there-by to massively empower our common American People. This form of 'Economic-Power De-Centralization' would so seriously disrupt the ability of aristocrats to continue pillaging & plundering our common people, that those aristocrats have formed powerful "private interest groups" which are routinely placing "Coercive Pressures" on the honorable Judges of Georgetown County, & the State of South Carolina.

A few case-law citations related to these important points, read as follows:

"Does 9/11 Justify a War on the Judicial Branch?"

http://www.gibbonslaw.com/Files/Publication/4547af23-03ba-4b15-b964-96953c11a960/Presentation/PublicationAttachment/c43242b4-21f9-417a-97d5-9956d7880773/Gibbons%20Speech_PDF%281%29.pdf

"... it was the executive branch's position that claims made on behalf of people detained outside the territorial limits of the United States were simply non-justiciable because the United States lacked sovereignty over the places of confinement. In the Supreme Court, the government elected not to defend the White House and Justice Department's extreme positions on executive branch authority to ignore the law but rather chose to challenge the judicial power to enforce it. Thus, I opened my argument to the Court:

What is at stake in this case is the authority of the Federal courts to uphold the rule of law. Respondents assert that their actions are absolutely immune from judicial examination whenever they elect to detain foreign nationals outside our borders. Under this theory, neither the length of the detention, the conditions of their confinement, nor the fact that they have been wrongfully detained makes the slightest difference. Respondents would create a lawless enclave insulating the executive branch from any judicial scrutiny now or in the future." Page 1105.

"What is clear is that the war by the executive branch and the legislative branch against the authority of the judicial branch to uphold the rule of law did not end ..." Page 1114.

~~~

"Administrative Justice & the Supremacy of Law in the United States'; By John Dickenson; 1927, … with .. Harvard College; 1955, Russell & Russell, Inc; … Harvard University Press; Studies from Princeton, Johns Hopkins, Columbia & Harvard Universities. (Pages: 34, 35, 36, 37, & 38)

"The multiplication in recent years of public bodies … has raised anew for our law … the problem of executive justice. That government officials should assume the traditional function of courts of law, and be permitted to determine the rights of individuals, is a development so out of line with the supposed path of our legal growth as to challenge renewed attention to certain underlying principles of our jurisprudence. ...

In the age of Coke such questions as these arose in connection with what has since been called "executive justice." To-day the term "executive" seems fitted to a narrower need, and "administrative justice" suggests itself a better name for the broader current legal development. (Chapter 1, Page 3)

"The introduction of administrative justice has encountered in our constitutional doctrine of the "separation of powers" a barrier which has been evaded only by the invention of a new set of glaring legal fictions embodied in such words as "quasi-legislative," "quasi-judicial," and the like. To review the development of these fictions would supply an instructive commentary on an important branch of American constitutional law, but it would not shed helpful light on the more fundamental problems presented by the substitution of administrative justice for adjudication by courts of law. These problems reach below the special limitations of American constitutional law and turn up for inspection some of the deepest principles of the Anglo-American legal system.

"In Anglo-American jurisprudence, government and the law have always in a sense stood opposed to each other; the law has been rather something to give the citizen a check on the government than an instrument to give the government control over citizens. There is a famous phrase, which has long been attributed to Bracton, ... that "the king has a superior, to whit, the law; and if he be without a bridle, a bridle ought to be put on him, namely, the law." This "rule of law" as Dicey calls it, or "supremacy of law," in Libeler's phrase, has uniformly been treated as the central and most characteristic feature of Anglo-American juristic habit; and nothing has been held more fundamental to the supremacy of law than the right of every citizen to bring the action of government officials to trial in the ordinary courts of
~~~

the common law. That government officials, on the contrary, should themselves assume to preform the functions of a law court and determine the rights of individuals, as is the case under a system of administrative justice, has been traditionally felt to be inconsistent with the supremacy of law. It was the ground of attack on the Court of Star Chamber, in the days when the Chancellor was still mainly an administrative officer of the King. Lieber mentions freedom from "government by commissions," and from the jurisdiction of executive courts, as one of the elements of Anglo-American Liberty." Ch 2, Pg 32.

"The orthodox doctrine of the supremacy of law has been stated by Dicey as including two principles: "It means in the first place that no man can lawfully be made to suffer in body or goods except for a distinct breach of law established in the ordinary courts of the land." It means in the second place "that no man is above the law, but that every man, whatever his rank or condition, is subject to the ordinary law of the realm, and amenable to the jurisdiction of the ordinary tribunals . . . With us, every official, from the Prime Minister down to a constable or collector of taxes, is under the same responsibility for every act done without legal justification as any other citizen." (Law of the Constitution, 8th edition. p. 185 & 189)

"In short, every citizen is entitled, first, to have his rights adjudicated in a regular common-law court, &, secondly, to call into question in such a court the legality of any act done by an administrative official." ...

"The substantive difference between administrative procedure and the procedure by law is that the administrative tribunals decide controversies coming before them, not by fixed rules of law, but by the application of governmental discretion or policy.

It is this last point which is of capital interest here. The competition between administrative & legal justice, is ... a phase of the age-old struggle between discretion and fixed rule, between *vouops* and *ekleiakela,* between equity and the strict law."

In so far as administrative adjudication is coming in certain fields to take the place of adjudication by law courts, the supremacy of law as formulated in Dicey's first proposition is overridden. But a possible way of escaping this result is left open by his second proposition. An administrative determination is an act of a governmental officer or officers; & if it be true that all the acts of such officers are subject to be questioned in the courts, it is then possible to have the issue of any questionable administrative adjudication raised & decided anew in a law court, with the special advantages guarantees of the procedure at law. We see here the reason why the question of court review of administrative determinations has become of such central importance and has been the focus of so much discussion since the rise of the administrative procedure. For just so far as administrative determinations are subject to court review, a means exists for maintaining the supremacy of law, though at one remove and as a sort of secondary line of defense. The special advantages of the administrative procedure may be substantially retained, while at the same time, in a given case, the result can be brought to the test of the procedure at law. Administrative justice exists in defiance of the supremacy of law only in so far as administrative adjudications are final and conclusive, and not subject to correction by a law court."

Keep in mind, please, that Cold-Blooded Tyrants, such as Joseph Stalin & Pol Pot, had No Reason to retain the services of any "Judicial Officers". Tyrants have No Need for Judicial Officers. Tyrants have only needs for Obedient Administrative & Military Officers, who "Follow Orders", Blindly, & with zero functionality of "Conscience", & with zero concern for constitutional "Justice".

This author believes that he has read, some-where, that, one of the first things that Adolph Hitler did, after he came to power, was to use his new military-police-state powers to incarcerate & otherwise persecute members of Germany"s Judiciary. Although citations escape me; it should be easy for honorable readers to comprehend, how a Military-Tyrant would have "Little Use" for Officers exercising "Judicial Powers".

Those who lust after massive centralized-power, have traditionally been served well by being able to bring "Confusion" in-to efforts from more honorable people to use constitutional due-process-of-law to resolve controversies.

Further here-under; these Plaintiffs here embrace the task of attempting to Communicate Clearly to all honorable Judges that might become involved with this case, precisely Why & How the deeper & more Constitutionally Powerful Concepts of Public "Due Process/Course of Law", aka: "Common-Law", aka: "Law of the Land", should properly be brought to bear, in Resolving the Dispute manifesting here-in.

****

The "Main-Point" of this Second & Amended Version of we Plaintiff's Complaint & Suit, is our "Title-of-Possession", aka: "Seisin" Claim.
Here-In, we Plaintiffs attempt to Clarify & Emphasize how this "Main Point" Proves the Legitimate "Standing" of we Plaintiffs to bring our Quiet-Title/Remove-Cloud & related Complaints.

55: These here below quoted "Maxims of Law" are in direct pursuit of what seems to be the main "Point of Dispute" to which this case has been reduced; which seems to have so fixated on the "Standing" of these Plaintiffs"; & whether or not we are here-in able to "Claim Superior-Title", above the Claim of the Defendants, to the Real-Property here-in question.

Our Anglo/American & South Carolina Constitutional System of Property-Law, aka: the "Law of the Land", is fundamentally in favor of preserving the Rights of those in the "Physical Possession" of Real-Property, such as we Plaintiffs.

Reputable Law Texts clearly indicate, that, there is much ancient, traditional, & constitutional "Law" based support for our claim that we Plaintiffs posses the Superior Title & right-of-possession of this property; in comparison with the here-in named Defendants. Many of these texts are so ancient & well-settled that they are known as "Maxims of Law"; & a few choice examples, directly related to the issues of concern in this case; read as follows:

"Possession Vaut Titre: ... the fact of possession raises a prima facie title or a presumption of the right of property in the thing possessed."

"Possession is Nine Tenths of the Law. … every claimant must succeed by the strength of his own title, and not by the weakness of his antagonist's."
Black's Law Dictionary. Common-Law-Maxims.

There are literal multitudes if similar citations available, all of which affirm & support this same general principle. Building even further on these powerful citations; the Defendant's, named here-in, can Not proceed on any allegations that the "Title" to this real-property, as claimed by we Plaintiffs, is "Weak". Rather, those Defendants can only claim their en-Title-ment to this real-property, based on what-ever "Strength" that they can show in support of their alleged "Title" to this property. And while the Defendants may narrowly & technically be viewed as "Correct", in their assertion that this case is Not yet Ripe for these Plaintiffs to Question their Title to this real-property; the Broader Principles of Law & Justice involved here-in, especially concerning the Laws of "Ejectment", all clearly Mandate that a more relaxed, holistic, & natural/organic standard for seeking "Justice" be adopted. The first citation quoted above clearly directs this Court to in this precise conclusion.

Here-under; & viewed in proper context, South Carolina's Statutory Codes are here presumed to

be similar to those in Oregon Statutes, where-in is actually recognized Other Forms of "Title" than that to which the Defendants are here attempting to constrain the focus of this Court. In fact, the much more organic & Common-Law based Statute, of ORS 164.105(3), as shown here-in above, contains the pivotal text, which reads:

"… [A] person in lawful possession of property shall be deemed to have a right of possession superior to that of a person having only a security interest … "

This Oregon Statutory Text , focused more narrowly through this specific passage, does more effectively focus on the "Core-Issue" involves in this case. Here-under; this Court can now clearly recognize that these Plaintiffs are Claiming a "Right of Possession Superior …" to those in the position of the Defendants. This Statutorily Recognizable "Right of Possession Superior …" is a form of an "En-Titlement", which clearly authorizes these Plaintiffs to Continue with our "Quiet & Peaceable Possession" of this Real-Property; at least until such time as some person or persons, un-known, might show a superior "Right of Possession", & there-by also show their "Superior Title".

This Oregon Statute; properly interpreted, recognizes precisely this. South Carolina Case-Law related to this precise issue, likely affirms these conclusions even more solidly, as also does Oregon Case-Law; as follows:

"... a deed given as a mere security for an existing debt is not effective to transfer the legal title or right of possession of the mortgaged property from the grantor to the grantee, … ."
C.C.A. Or 1910. Sheradin v. Southern Pac. Co. 179 F. 81, 102 C.C.A. 375

The gist of the action of forcible detainer … is the force, either in the entry or detainer, or both; the object of the statute being to prevent and punish the use of forcible & violent means …, irrespective of question of actual title, and where these do not exist the action can not be maintained. Forcible entry & detainer cannot be maintained where there is nothing to show that defendant detained the premises by force, or by threats of personal violence. The action can not be made a substitute for ejectment.
Or. 1883: Taylor v. Scott, 10 Or. 483

This all clearly indicates, in broader context, that, as related to this case; the only interest that Defendant, "First Citizen" has in this Real-Property, is to use it as a "Security Interest", and as Collateral, for propping-up their financial balance-sheet, for their legal-fiction corporation. These Oregon case-law texts clearly place in proper & fuller perspective how this Statute is Intended to be Construed by those honorable Judges looking for lawful guidance & direction on this point.

Further here-under; these Counter-Plaintiffs are Recognizable before this Court as having Stated Sufficient Facts to establish our Claim of having a "Title Superior" to that of the Counter-Defendants. Further here-under; if we might be so blessed as to Prove this Claim before a conscience-bound & law-respecting Jury; then, this Real-Property will there-by be Lawfully Adjudicated to be Ours.

59: Building on these conclusions; these Plaintiffs here-by present even broader & more anciently sourced Citations, quoted from a single & reputably sourced text-book, where-in what may be reasonably construed as some forms of "Maxims of Law" are presented, as follows:

"… It is sufficient to allege a Title of Possession only, a Naked Allegation of Possession being Sufficient."
"... in the final analysis, No Title could be Tried Without Also Trying Possession."

"Every Title to Land has its Root in Seisin;
the Title which has its Root in the Oldest Seisin is the Best Title."
"Trespass, being an interference with the possession, …
does Not Require a Legal Title to support it.
Under the early Common Law, …
the so-called Title ... Was Only an Older Possession, … ."
"… the Possession Gives the Defendant a Right Against
Every One who CanNot *Show* ... a Prior Possession, … .
The Defendant May Hold the Land WithOut any Title thereto,
as his Mere Possession Gives him a Right to Resist ..."

For purposes of emphasis; this Co-Counter-Plaintiff Stewart has taken the liberty of Capitalizing some letters in the above text. The fuller context, with more precise capitalization, & with source citation; is here presented more fully, as follows:

"For reasons of public policy, the Common Law protected a person in peaceable possession of land, irrespective of the method of acquisition. Actual seisin or possession, however acquired and however wrongful, created a presumptive right of possession, ... In case of being dispossessed, the disseisee could vindicate his right of possession by resort to some Possessory Proceeding, basing his action on his actual seisin and the wrongful act of the disseisor in ousting him. … when ownership in land is resolved into its essential elements, … the fundamental one is the right of possession. … the right of property enforced in the Proprietary Actions is nothing more than an older and *superior right of possession*." Page 50.

"As Pollock and Maitland so truly observed, "every Title to Land has its root in Seisin; the Title which has its root in the Oldest Seisin is the Best Title." Page 51.

"When an action is founded on possession only, and not on Title or Ownership, it is sufficient to allege a Title of Possession only, a naked allegation of possession being sufficient.

Alleging Title of Possession: It is often sufficient to allege a Title of Possession only." Page 116.

A Mere Naked Possession as Sufficient Title … Since the days of Ancient Real Possessory Actions … one forcibly ousted from his possession could be summarily restored to his possession. The law protected one in possession of real property in order to prevent breaches of the peace. ... Trespass, being an interference with the possession, … does not require a legal Title to support it. Under the early Common Law, … the so-called Title ... was only an older possession, ..." Pages 161-163.

"It is a general rule, that no right of entry, or reentry, can be reserved, or given to any other person, than the feoffer, donor or lessor, &c. and their heirs ; and such right of entry cannot be assigned or transferred to another (Litt. F. 347). This principle had its origin in the policy of the Ancient Law, to guard by all possible means against *maintenance*, the subversion of justice, and the oppression of the poor, by the rich and powerful. For if men were allowed to grant before they obtain possession, as Lord Coked remarks, pretended titles might be granted to great men, whereby right might be trodden down, and the weak oppressed." (Stearns, Summary Law & Practice Real Actions, Intro …) (Pgs 228-229, fnote 10)

"... in the final analysis, no title could be tried without also trying possession. …" Pg 229.

"The plaintiff, in all Cases, must recover on the strength of his own Title. He cannot found his claim upon the insufficiency of the defendant's title, for the possession gives the defendant a right against every one who cannot *show* ... a prior possession, … The defendant may hold the land without any Title thereto, as his mere possession gives him a right to resist ..." Page 233.

"... the rules & principles which for centuries were applicable to & developed by the old Common Law Action of Ejectment are, for most part, equally applicable to its Modem Statutory Counterpart." Pg-243.

"Common Law Pleading"; Hornbook, West Publishing Co., 1969;
Koffler & Reppy; … New York Law School;

http://legal-textbooks.com/law-civil/handbookofcommon-law-pleading.html

Another ten pages could easily be written here, in drawing out these powerful & deeper arguments in-to the support of the position of these Plaintiffs. The earlier gleanings of these citations nicely summarize these precise points. While these Plaintiffs will be happy to engage in verbal or interned-based discussions of the legitimate interpretations of these citations; we are not inclined here to further elaborate or explain them. This document is already ab-normally lengthy; & these modes of "Civil Procedure", where-in litigants routinely attempt to exhaustively address every possible argument that might manifest; seem clearly to us to be counter-productive.

60: Further note here, please, that, in the Circuit Courts of this State, & the Judges there-in, possess "General Jurisdiction", & "At Law" Jurisdiction; all of which does Not Rely on Statutory Enactments of the Legislative Assembly in order for them to follow well-settled & traditional "Due Process of Law", & there-by in order for them to "Administer Justice", in response to the Complaints which are brought before them. Article 1 Section 3 of South Carolina's Constitution heroically & clearly drives a stake through the heart of all arguments to the contrary.

61: Further note here; the phrase "Legal Title", becomes of "Primary Interest"; & a quote from "Black's Law Dictionary", 5th edition, is helpful here, as follows:

"Legal Title: ... one which is complete and perfect so far as regards the apparent right of ownership and possession, … . It may also mean appearance of title as distinguished from complete title."

Here-under, is shown, the dysfunctionality & inherently confusing nature of the codes & regulations of the Roman Empire, & its Civil/Municipal Jurisdiction, as the 1871 citation else-where here-in from Samuel Tyler so effectively frames & clarifies. The above quote clearly indicates "Two Differing Definitions" of the phrase "Legal Title". One Definition indicates "Complete Title", & includes "Rights of Possession"; where-as the other Definition clearly does Not Include "Complete Title". The former definition is a pure "Common-Law Definition", because of its inherent clarity & grounding in natural-law; while the latter is a definition derived from Roman Civil/Municipal Codes, because it focuses more on "appearance" than on meaningful substance; & because it leaves those reliant there-on, in an equally lost & confused mental state as before they observed that later definition.

63: Of significance here-under; is that, before the powerful Counter-Defendant "First Citizen" can lawfully gain Possession of the property in question in this case; that Defendant Must First Show Evidence that They have Had some sort of an Actual Physical "Possession" or "Seisin" of this real-property, at some time in the past. They can Not Do That. Counter-Defendant First Citizen is likely to admit that they have never had any actual physical "Possession" of this property; & we co-plaintiffs solemnly affirm this to be the true fact of the matter.

64: Further, this Counter-Plaintiff Cynthia Moore is presenting in-to the Court Records of All Courts concerned with this case, her Sworn "Affidavit of Title of Possession", & which is in accompaniment with this Counter-Complaint document, & labeled as an "Exhibit" here-under.

Here-under; we Plaintiffs were & are Clearly Claiming this same "Title of Possession"; which derives its authority before this Court, from this Court's more General Jurisdiction, & more "Public Law" authority, to follow the more ancient & traditional & Constitutionally Prioritized & Protected "Common-Law", or "Law of the Land", or "Due Course of Law".

"Article 1 Section 3" of "South Carolina's Constitution" clearly Guarantees to we common

People of South Carolina, & Georgetown County, our "Rights" to Invoke this very "Due Process of Law", as we Plaintiffs are here-in claiming; & this all with-out any necessity for us to rely at all on any "Title by Contract", or any other Lex-Scripta Private Jurisdictional arguments.

66: The Judges of South Carolina's Civil/Municipal Circuit-Court System, seem in the habit of presuming that all complaints which non-professional members of the public bring before them, are legitimately resolvable under private-jurisdictional "Contract-Law".

Applicable Case-Law, as clearly articulated in the collective horn-book summaries there-of; clearly indicate that "Actions At Law" are to be Given "Preference" with-in the constitutional civil/municipal Jurisdiction of this State's Circuit-Courts; & this is especially true when a case before them includes "Issues of Public Interest". A very large "Public Interest Issue" here is our efforts to "Maintain the Integrity of the Judiciary", at every level of Government. This is all defined by the classical "Rule of Law"; which, when fully researched, is shown to equate to constitutional, "Due Process of Law", aka: "Due Course of Law". The case here-in is also moving to so strengthen these honorable ideals in our local Judiciary.

We ex-rel Plaintiffs wish to more forcefully emphasize these Pivotal Issues of civil/municipal "Procedure" here, as previously & now again quoted from the federal case-law of "Beacon Theaters vs Westover"; as follows:

"**Since in the federal courts equity has always acted only when legal remedies were inadequate, the expansion of adequate legal remedies ... necessarily affects the scope of equity. Thus, the justification for equity's deciding legal issues ... must be re-evaluated in the light of the liberal joinder provisions of the Federal Rules ... Similarly the need for, and therefore, the availability of such equitable remedies ... must be reconsidered ... . This is not only in accord with the spirit of the Rules and the Act but is required by the provision in the Rules that '(t)he right of trial by jury as declared by the Seventh Amendment to the Constitution ... shall be preserved * * * inviolate.'**

… **Since the right to jury trial is a constitutional one, however, while no similar requirement protects trials by the court, that discretion is very narrowly limited and must, wherever possible, be exercised to preserve jury trial. ... 'In the Federal courts this (jury) right cannot be dispensed with ... nor can it be impaired by any blending with a claim, properly cognizable at law, of a demand for equitable relief ... . This long-standing principle of equity dictates that only under the most imperative circumstances, circumstances which in view of the flexible procedures of the Federal Rules we cannot now anticipate, can the right to a jury trial of legal issues be lost through prior determination of equitable claims."**

Beacon Theatres, V. Westover, US Supreme Court (1959); 359 U.S. 500, 79 S,Ct. 948, 3 L.Ed. 988.

While this above citation nicely out-lines these important concepts; these Plaintiffs believe further citations related to this same case-law is good to present at this juncture, as follows:

"Given the fact that we can no longer distinguish what is law and what is equity - because of merger - the adequacy test seems almost meaningless. On the other hand, the analogical tests are geared to English experience under an outmoded system and are quite difficult to apply.

One possible solution seems …. A declaratory judgement, where authorized is always legal, and if it is adequate to protect the rights of the party, the claim will be treated as one for declaratory judgement and jury granted if demanded. ... However, if there are any legal issues in the case, these must be tried first ... . The result is that the judge can grant final equitable remedies only to the extent that these may be consistent with the jury's decision on the facts of the legal issues..

Beacon took a quite different approach by simply issuing its own declaratory judgement that all declaratory judgements were "legal". This made it possible to insist upon jury trial for virtually all cases with such supplementary equitable relief as may be consistent with the jury's findings.

Handbook on the Law of Remedies; Damages, Equity, Restitution. Pages 74 – 76. Dan B. Dobbs; Professor of Law, University of North Carolina, Hornbook Series; West Publishing Co.; 1973.

These Plaintiffs believe that these more enlightened judicial ideals are harmonious with case-law from South Carolina. We will remain "open for correction", from opposing council, from judicial public-servants, or others; if any of these can show to us how our belief here is "in error".

~~~~~~

Specific Lawful Basis for this Quiet-Title/Remove-Cloud, Public-Nuisance, Racketeering, Conspiracy, & other Complaints, here-in:

68: OverView: The averments of the preceding paragraphs are restated here by reference. These Plaintiffs are in the actual "Physical-Possession" of the property referred to herein. Defendant "First Citizen" claims an adverse interest in the property referred to herein. This action is bought, in major part, for the purpose of determining that claim.

69: Here-under; the claim of Defendant First Citizen to this Property, is "Invalid" & "Un-Lawful"; because, at least in part, it is based upon a Mortgage document which is presently "Void", as a matter of law; because, at least in part, the "Promissory Note" that it was issued to secure was entered into with "Un-Clean-Hands", & under Unconscionable, Fraudulent, & Usurious Circumstances, all of which makes the "Mortgage" document Un-Lawful & Invalid.

71: Failure of Consideration: The averments of the proceeding paragraphs are restated by reference herein. As a result of the practices described in the Factual Historical section above, the original lender, 'Palmetto Heritage Bank & Trust', did Fail to Lend any Valuable Consideration. The original lender Palmetto only Lent a "Promise to Pay" the substance of value which is known as "Legal Tender" by issuing their "Promise to Pay" that said Legal Tender, through their issuing of their Negotiable Instruments and/or Electronic Credits. Any Legal Tender that Palmetto did actually part with as a result of the Negotiable Instruments later being presented to them was a secondary and lawfully unrelated transaction. These same realities apply to the present interest holder in this property, "First Citizen". Here-under, Defendant First Citizen's Interest in this property is unlawful. Further here-under; "Law" Requires that Title be Quieted in these Plaintiffs, & that the Defendants be barred from bringing any sort of action for the "Ejectment" of these Plaintiffs from this property, including any sort of an "Unlawful Detainer" Action.

72: Breach of Contract, First Count. The U.S. Congress, in deciding what was to be "Legal Tender" in "Payment of Debts" for this country, by act on April 2nd, of 1792, defined the term "Dollar" to mean specifically a coin issued by the U.S. Government containing 371 4/16 grains of pure Silver. There is no Constitutionally Lawful Authority for referring to any form of paper currency or electronic credits as "Legal Tender Dollars". As Palmetto failed to lend to the original borrower, Richard McDonald, any "Legal Tender Dollars", within the "Constitutional Definition" of this term, the Contractual Agreement between these parties was Breached by Palmetto, & the resultant Promissory Note & the Mortgage upon which it is founded are lawfully "Invalid".

Here-under; Counter-Defendants Palmetto, First Citizen, & Crawford &Von Keller, each & all knew, or should have known, of the 'Un-Lawful Origin' of their Beneficial Interest in the Mortgage and the accompanying Promissory Note of which it was assigned. How-ever; they did Not Care about these Requirements of the Law for Respect of the Rights of the Common People of this County, State, & Nation; because they were only concerned about maximizing short-term profits, & avoiding
~~~~~~

imprisonment. Here-under; Defendant First Citizen's Interest in this property is Invalid & Un-Lawful; because the Promissory Note & the Beneficial Interest to the Mortgage held by Defendant First Citizen are Invalid & Un-Lawful. Further here-under; "Law" Requires that Title be Quieted in these Plaintiffs, & that the Defendants be barred from bringing any sort of action for the "Ejectment" of these Plaintiffs from this property, including any sort of an "Unlawful Detainer" Action.

73: **Breech of Contract, Second Count:** The averments of the proceeding paragraphs are restated herein by reference. By "Common Acceptance", and the decrees of the Federal Reserve Bank, and perhaps even the U.S. Congress; "Federal Reserve Notes", and other US Currency, have come to be known as "Legal Tender Dollars". Palmetto entered into a contract to lend these "Legal Tender Dollars" to Richard McDonald, & Richard McDonald there-under also agreed to repay in these "Legal Tender Dollars". The contracting parties did Not enter into a Contract to be Lent or to repay Palmetto's Negotiable Instruments or Electronic Credits, which were "Created out of Thin Air" by Palmetto. Yet that is precisely what Palmetto did lend to Richard McDonald. Palmetto did Not loan any of these Federal Reserve Note based "Legal Tender Dollars" to Richard McDonald, as this phrase has commonly come to be known & used.

Here-under; Counter-Defendants Palmetto, First Citizen, & Crawford &Von Keller, each & all knew, or should have known, of the 'Un-Lawful Origin' of their Beneficial Interest in the Mortgage and the accompanying Promissory Note of which it was assigned. How-ever; they did Not Care about these Requirements of the Law for Respect of the Rights of the Common People of this County, State, & Nation; because they were only concerned about maximizing short-term profits while avoiding imprisonment. Here-under; Defendant First Citizen's Interest in this property is Invalid & Un-Lawful; because the Promissory Note & the Beneficial Interest to the Mortgage held by Defendant First Citizen are Invalid & Un-Lawful. Further here-under; "Law" Requires that Title be Quieted in these Plaintiffs, & that the Defendants be barred from bringing any sort of action for the "Ejectment" of these Plaintiffs from this property, including any sort of an "Unlawful Detainer" Action.

74: **Ultra Varies, Count One.** The proceeding paragraphs are restated by reference herein. Counter-Defendant Palmetto exceeded the express provisions of it's 'Corporate Charter', in that it engaged in the activity of loaning a substance other than "Legal-Tender Dollars" of the United States. The Negotiable Instruments which it issued in granting the loan here in question are not "Legal-Tender Dollars" of the United States, in either the Constitutional Gold and Silver Definition, or by the Commonly Accepted & so-called "Federal Reserve Note" Definition. By all reasonable modes of construction, Palmetto was authorized by it's charter to Loan Only "Legal-Tender Dollars" of the United States. As the terms of the corporate charter were exceeded by Palmetto's Corporate Officers in making this loan, it is a lawfully invalid loan.

Here-under; Palmetto, First Citizen, & Crawford & Von Keller, knew, or should have known, of this Un-Lawful origin of the Beneficial Interest in the Mortgage and the accompanying Promissory Note of which it was assigned. How-ever; they did Not Care about these Requirements of the Law for Respect of the Rights of the Common People of this County, State, & Nation; because they were only concerned about maximizing short-term profits while avoiding imprisonment. Here-under; Defendant First Citizen's Interest in this property is Invalid & Un-Lawful; because the Promissory Note & the Beneficial Interest to the Deed of Trust held by Defendant First Citizen are Invalid & Un-Lawful. Further here-under; "Law" Requires that Title be Quieted in these Plaintiffs, & that the Defendants be barred from bringing any sort of action for the "Ejectment" of these Plaintiffs from this property, including any sort of an "Unlawful Detainer" Action.

75: **Indefiniteness:** The averments of the preceding paragraphs are restated here by reference. As a result of the failure of Palmetto to Specify the Essential Term of whether they would Loan in either Federal Reserve Note "Dollars", or Gold and Silver "Dollars", or their own "Created out of Thin Air" Negotiable-Instruments or Electronic-Credit "Dollars"; and weather or not they would demand payment in the same form or in a different form; the Defendants Created a Contract which was "Indefinite" to the point that a Court of Law will not be able to determine Which Type of Funds was either Agreed to be Loaned or Agreed to be Repaid. As a result the Contract is "Indefinite", with-in the legal-definition of this term; & it is there-under Un-Lawful & Invalid.

Here-under; Palmetto, First Citizen, & Crawford & Von Keller, knew, or should have known, of this Un-Lawful origin of the Beneficial Interest in the Mortgage and the accompanying Promissory Note of which it was assigned. How-ever; they did Not Care about these Requirements of the Law for Respect of the Rights of the Common People of this County, State, & Nation; because they were only concerned about maximizing short-term profits while avoiding imprisonment. Here-under; Defendant First Citizen's Interest in this property is Invalid & Un-Lawful; because the Promissory Note & the Beneficial Interest to the M<ortgage held by Defendant First Citizen are Invalid & Un-Lawful. Further here-under; "Law" Requires that Title be Quieted in these Plaintiffs, & that the Defendants be barred from bringing any sort of action for the "Ejectment" of these Plaintiffs from this property, including any sort of an "Unlawful Detainer" Action.

76: **Unconscionability:** The averments of the preceding paragraphs are restated here by reference. As a result of the Fractional Reserve Banking Practices and the loan of the Negotiable Instruments and/or Electronic Credits which were Created Directly by Palmetto, and their corporate officers; the actual amount of Federal Reserve Notes which were eventually actually parted with, was only approximately 1/10th, or 10%, of that which were actually contracted to be delivered to the original borrower, Richard McDonald. Here-by; the "Interest Rate" upon the "Legal-Tender Dollars" which were actually parted with was at least 10 times greater than the amount agreed to in the original Mortgage Contract. This is a violation of State and Federal provisions against "Unconscionable" actions and contracts, as set forth in U.C.C. sections 2-302, and others.

https://www.law.cornell.edu/ucc/2/2-302

77: Further, the parties to the contract occupied substantially "Un-Equal Bargaining Positions", in that Palmetto had access to the ability to Circulate it's Own Self-Created Negotiable Instruments and Electronic Credits as "Money" with-in this State and Nation. By this activity, Palmetto & the other here-in named Defendants, have an Un-Fair Advantage in their ability to Circulate as Money the Negotiable Instruments & Electronic Credits which they issue. This gave Palmetto the ability to circulate approximately Ten-Times the amount of money in comparison to the amount that the Common People of this Nation can circulate. As the Negotiable Instruments and Electronic Credits of Richard McDonald & the Common People of our Nation were not capable of being competitively circulated as money, Richard McDonald was in a substantially "Un-Equal Bargaining Position" with Palmetto, & was thus Un-Fairly Coerced to enter in-to the Promissory-Note & Mortgage Contracts. As a result, these are "Un-Conconscionable Contracts", because of the "Un-Equal Bargaining Positions" of the parties there-to.

78: Even further; the Defendants may reasonably be presumed, in the past, to have used court-related actions to Evict/Eject our Common-People from our homes, when South Carolina statutes, & general due-process, requires, that, they not be allowed to do so, because they have Nothing

More than a mere “Security Interest” in these properties. Here-under; these same Counter-Defendants may reasonably be presumed to be scheming to invoke similar lawless process against these Ex-Rel Co-Plaintiffs at this very moment. Here-under; these Counter-Defendants would be conspiring to move a court of law so-as-to give color-of-legitimacy to a court-issued directive to our local County Sheriff's Deputies, to lawlessly administer the Force of the County, to Evict/Eject we Ex-Rel Plaintiffs from the quiet & peaceable possession of our home. This is not only entirely “Lawless”; it is also all very “Un-Conscionable”; & any conscience-bound & fair-minded Jury will surely recognize the merits of these sorts of arguments.

79: **Usury:** The averments of the preceding paragraphs are restated here by reference. In the Alternative that the Promissory Note which the present Mortgage is designed to secure might be viewed as lawfully requiring a Repayment in “Legal-Tender Dollars”, as commonly defined to be “Federal Reserve Note Dollars”; then any good faith estimate accounting for that actual amount of Federal Reserve Note Dollars which were actually parted with will reveal that Palmetto & the other here-in named Defendants have actually gained a “Usurious” Amount of Interest on this loan. Through the use of their “Fractional Reserve Banking System”, Palmetto & these other Defendants likely only parted with a sum of Federal Reserve Notes amounting to less than 1/10th of the face value of the Negotiable Instruments and/or Electronic Credits which they actually issued in their efforts to secure their interest in the property in question in this case. This means that the actual “Interest Rate” upon the accurate amount of Federal Reserve Note denominated Dollars which were Actually Parted With by these corporate entities, as the direct result of this loan, was a minimum of Ten-Times Greater than the amount actually agreed to by Richard McDonald in the original Promissory Note and Mortgage Contracts which we entered into.

80: This is a violation of both Common Law & Statutory Law Prohibitions against “Usury” as they presently exist under the vast majority of the laws of this State & Nation. As a result of this Usury, the obligations true, & much Smaller but hidden “Principal” has been “Paid Off” by Richard McDonald, and all economic “Interest” on the true Principal that Palmetto & the here-in named Defendants have in the property in question, has also been repaid. As a result the interest that Defendant First Citizen continues to claim through the Mortgage & Promissory Note no longer exists.

Here-under; Palmetto & the here-in named Defendants knew or should have known of this Un-Lawful origin of the Beneficial Interest in the Mortgage and the accompanying Promissory Note of which it was assigned. How-ever; they did Not Care about these Requirements of the Law for Respect of the Rights of the Common People of this County, State, & Nation; because they were only concerned about maximizing short-term profits while avoiding imprisonment. Here-under; Defendant First Citizen's Interest in this property is Invalid & Un-Lawful; because the Promissory Note & the Beneficial Interest to the Deed of Trust held by Defendant First Citizen are Invalid & Un-Lawful. Further here-under; “Law” Requires that Title be Quieted in these Plaintiffs, & that the Defendants be barred from bringing any sort of action for the “Ejectment” of these Plaintiffs from this property, including any sort of an “Unlawful Detainer” Action.

81: Extortion: The averments of the preceding paragraphs are restated here by reference. Defendants Conspired to “Extort” a “specific form of money” from these Plaintiffs, all after these Plaintiffs had Already “Discharged”, in full, all Debts that they claim that we owe to them for their claimed-interest in this Barlow-house property. This complete “Discharge of Debts” has fully transpired, all in full accordance with South Carolina's version of the “Uniform Commercial Code”. Evidence in support of this “Allegation of Fact” should be in accompaniment to this Complaint as an

Exhibit.

This "Extortion" charge is further reasonably "Justified", because of the common knowledge, that, if we Plaintiffs insist on our "Title & Rights of Possession" of this real-property; that, the Defendants will likely engage in their reasonably-presumable habitual-practice of invoking court-related process for having we Ex-Rel Plaintiffs Ejected/Evicted from our property, even though they are entitled to nothing more than a "Security Interest" here-in. Previously quoted Oregon case-law related to Ejectment & Unlawful-Detainer Actions clearly proves that the Defendants are Not En-Titled to so invoke any court-related process for so having we Plaintiffs Ejected/Evicted from our property; quoted here-in again, as follows:.

"... a deed given as a mere security for an existing debt is not effective to transfer the legal title or right of possession of the mortgaged property from the grantor to the grantee, … ."

C.C.A. Or 1910. Sheradin v. Southern Pac. Co. 179 F. 81, 102 C.C.A. 375

The gist of the action of forcible detainer … is the force, either in the entry or detainer, or both; the object of the statute being to prevent and punish the use of forcible & violent means …, irrespective of question of actual title, and where these do not exist the action can not be maintained. Forcible entry & detainer cannot be maintained where there is nothing to show that defendant detained the premises by force, or by threats of personal violence. The action can not be made a substitute for ejectment.

Or. 1883: Taylor v. Scott, 10 Or. 483

82: **Attempted Collection of an Unlawful Debt in Violation of Principles of Law enshrined within 18 USC 1961, 1962, and 1964.** The averments of the proceeding paragraphs are restated herein by reference. Palmetto & the other named corporate Defendants, including First Citizen, have received income from collection of the un-lawful debt which presently is encumbering these Plaintiff's property. These Defendants have participated in and/or used the proceeds of such income in the operation of an enterprise which engages in activities which affect interstate and foreign commerce, all of which violates of general & public principles of Common-Law, as enshrined with-in 18 U.S.C. 1961, 1962, and 1964.

Here-under; Palmetto & the other here-in named Defendants, knew, or should have known, of this Un-Lawful origin of the Beneficial Interest in the Mortgage and the accompanying Promissory Note of which it was assigned. How-ever; they did Not Care about these Requirements of the Law for Respect of the Rights of the Common People of this County, State, & Nation; because they were only concerned about maximizing short-term profits while avoiding imprisonment. Here-under; Defendant First Citizen's Interest in this property is Invalid & Un-Lawful; because the Promissory Note & the Beneficial Interest to the Mortgage held by Defendant First Citizen are Invalid & Un-Lawful. Further here-under; "Law" Requires that Title be Quieted in these Plaintiffs, & that the Defendants be barred from bringing any sort of action for the "Ejectment" of these Plaintiffs from this property, including any sort of an "Unlawful Detainer" Action.

83: Fraud: The averments of the preceding paragraphs are restated here by reference. Those previous paragraphs clearly show the fraudulent nature under which the promissory-note & mortgage associated with this real-property were entered in-to. As shown there-in; Palmetto Purposefully "Deceived" record-owner Richard McDonald concerning the actual Amount of Money which they were loaning to, & actually making off of, their loan to Richard McDonald. Here-by; Palmetto committed a "Fraud" upon Richard McDonald, which allowed Palmetto & the here-in named Defendants to take Fraudulent Advantage of Richard McDonald, as well as of multitudes of other simple and honest working South Carolinians & Americans; including we Ex-Rel Plaintiffs. All of the here-in named

Defendants have been knowingly & willfully participating in the Same "Fraud". Here-under; Palmetto & the here-in named Defendants knew, or should have known, of this Un-Lawful origin of the Beneficial Interest in the Mortgage & the accompanying Promissory Note.

Further; we Ex-Rel Plaintiffs are "Successors in Interest" to the record-owner of this real-property; & here-under we hold his same rights to "Discharge the Debt" associated with this property. The Defendants named here-in have here-under also committed "Fraud"; because, even though we Plaintiffs had completely "Discharged" all of the Debts associated with this property, those Defendants are Fraudulently Claiming that they are Justified" in their Refusal to Release their Interest in this real-property to us. Those powerful Financial-Institution Defendants particularly have purchased their interest in this property with comparatively Cheep "Dollars", but they are Demanding Re-Payment in very Dear & Precious "Dollars". The Defendants named here-in do Not Care about the Requirements of the Law; because they were only concerned about maximizing short-term profits. This is all very "Fraudulent"; & any conscience-bound & fair-minded Jury will surely find the same to be "True". Here-under; Defendant First Citizen's Interest in this property is Invalid & Un-Lawful; because the Promissory Note & the Beneficial Interest to the Mortgage held by Defendant First Citizen are Invalid & Un-Lawful.

85: Conspiracy to Commit Robbery and Theft: The averments of the preceding paragraphs are restated here by reference. Palmetto & the other named corporate Defendants, including First Citizen, have all Conspired to Fraudulently Engineer Color-of-Law Authority, so that they may enter into the of the Courts of this State & Nation, & by way of "Summary Judgement", "Ejectment" or "Unlawful Detainer" actions, obtain Orders to Sheriffs or other Executive Officers to Mis-Use the Force of their Offices, all so-as-to "Breach the Peace" of the Common People of this Nation. This is all in Bold Violation of our Constitutionally Guaranteed Rights to have such matters as these settled by "Due Process of Law", all as set forth in Article 1 Section 3 of South Carolina's Constitution. Here-by; these here-in named Defendants have Conspired to commit Theft and Robbery of the Homes of the Common People of this Nation, including these Plaintiffs, all as Theft & Robbery are defined through general & public Common–Law, as well as by their definition under our State & National Statutory-Law.

86: Public Nuisance: The averments of the preceding paragraphs are restated here by reference. In addition to the Equitable nature of the "Quiet Title" portion of our Complaint, the Common-Law Authority of this complaint is also invoked, not only to "Remove Cloud", but also regarding "Nuisance", similarly as preserved in Oregon's Statutes at ORS 105.505 – 105.600; but in citation of similar statutory authority in South Carolina. The evils complained of here-in, clearly amount to a "Nuisance"; as defined in these Statutes, & as defined under general American & South Carolina Property Law, & as defined through general deeper American & South Carolina Constitutional Common-Law. This "Public Nuisance" portion of our Complaint, is based on the general large-scale "Pattern" in which these Un-Conscionable & Fraudulent Banking & Foreclosure Practices are Routinely being Committed by the Defendants & their powerfully-influential Cohorts, as against the Rights of South Carolinians & Americans every-where. These general & public interests of Common-Law & Statutory "Justice" Require that the very real Dangers of the Evils produced through these sorts of wide-spread & Socially Disastrous "Nuisance" activities be quickly & firmly Abated.

Here-under; Palmetto & the here-in named Defendants, knew, or should have known, that their lending practices were In Violation of these Fundamental Principles of General American & South Carolina 'Public Law'; & there-under of the Un-Lawful Origin of the Beneficial Interest in the

Mortgage & the accompanying Promissory Note. How-ever; they did Not Care about these Requirements of Law; because they were only concerned about maximizing profits. Here-under; Defendant First Citizen's Interest in this property is Invalid & Un-Lawful; because the Promissory Note & the Beneficial Interest to the Mortgage held by Defendant First Citizen are Invalid & Un-Lawful; & Title should be Quieted in these Plaintiffs.

87: Illegality by Monopoly, Conspiracy, and Racketeering. The averments of the preceding paragraphs are restated here by reference. All of the here-in-named Corporate Legal-Fiction Defendants, and their officers, and other Banking, Financial, Political, and/or Real Estate Institutions (unknown or unnamed at this time) have all knowingly or unknowingly "Conspired" Against the Working Class Population of the good County of Georgetown, & this Constitutional State & Nation, to submerge us all a mountain of perpetual & unpayable Debt. The Federal Reserve Banking corporation, which the defendants are franchise/agents of, have historically demonstrated a track record of purposefully expanding & contracting the money supply at timed intervals so as to purposefully dispossess economically vulnerable South Carolinians and Americans from our property. The videos web-linked elsewhere in this complaint clearly document these historical "Facts" in manners which are idiot-proof. All who contest these Truths are either complete idiots; or else they are actively supporting this larger despotic racketeering conspiracy.

These Plaintiffs, & all of the good people of Georgetown County, the State of South Carolina, & the United States of America, are all the pointed "Targets" of a Conspiracy by the Defendants & others, to reduce us to a class of obedient and broken "Slaves", who are there-under schemed to exist in a society with substantially less constitutional rights than the working-classes of common people in the previous Nazi Germany or Soviet Union. As defined in Oregon Statutes at ORS 166.715 - 166.735 , the here-in named Defendants have engaged "in at least two incidents ... that have the same or similar intents, results, accomplices, victims or methods of commission, or otherwise are interrelated by distinguishing characteristics, including a nexus to the same enterprise". South Carolina very likely has statutory codes which read similarly; & the acts complained of here-in are clearly within these broad "Racketeering" parameters.

~~~~~~

Expanding on the Conspiracy, Monopoly, & & Racketeering Allegations in the Complaint of these Plaintiffs:

88: The Corporate Legal-Fiction Counter-Defendants and their Officers are active Causes of & Participants in the present Increase in the "Foreclosure Rate" in this State & County. The individual officers of these corporate legal-fictions should be knowledgeable of their complicity in this criminality despotic scheme. Those Corporate Officers have caused detriment & "Damage" to these Plaintiffs, & to every homeowner in this State, by way of the manner in which they have been entering into this, & the majority of their other, lending & foreclosure & eviction practices.

All of the Defendants named in this case may reasonably be presumed to be fully aware of the factual realities, that, the source of their superior economic status in our modern society, & over & above that disenfranchised status of we Plaintiffs; is as the direct-result of their being at the higher-levels of the lawless "trickle-down economics" policies, all of which flow to each of them, through the working-relationships which they have developed with those criminally privileged, "too big to fail", & private/corporate banking institutions.

As clearly explained in the here-in linked videos; those powerfully-influential private banking
~~~~~~

institutions have “Targeted” the poorer & middle-class people of our American nation; & there-in those Conspirators do maliciously seek to have the constitutionally-guaranteed Rights of our American People reduced to something similar to what was allowed to exist during “World-War Two” among the working-class people, of all races, who barely survived the cross-cultural holocaust of Nazi Germany & the Soviet Union. As the here-in linked videos clearly explain; this evil agenda is being carried-out, even now, by way of those fewer but more powerful entities, “Conspiring”, with multitudes of lower-level “Franchisees” of their massive pyramid-scheme, such as the here-in named Defendants.

Here-under; & whether they consciously realize it or not; the here-in named Defendants are working in an active “Racketeering Conspiracy” with those powerful & corrupted private/corporate interests, to reduce our American People to a class of obedient and broken “Slaves”. This scheme has been referred to by prominent proponents there-of as a “New World Order”.

https://www.youtube.com/watch?v=QBSJvtkPICM
https://www.youtube.com/watch?v=k3P1QyOQVHk

89: These last linked videos; in accompaniment with the videos linked else-where here-in, & which more directly explain the corrupted nature of the economic system under which our American People are presently laboring; all clearly provide comprehensive “Evidence”, that, the specific provisions of Common State Statutes Statutes , including like those of South Carolina, & which are designed to Prohibit these sorts of “Racketeering Activities”, are routinely being violated. Those violations are routinely being committed by those powerfully influential natural-persons who are involved, directly &/or indirectly, with those immensely powerful corporate/legal-fiction organizations. As likely similarly applicable for South Carolina; ortions of the Oregon Statutes which directly relate to these concerns, are:

166.715 Definitions (6) "Racketeering activity" ... means ... to conspire to commit, or to solicit, coerce or intimidate another person to commit: … (B) bribery and perjury; (C) obstructing governmental administration; (D) abuse of public office; (K) ... theft, burglary, criminal trespass and related offenses; (P) ... forgery and related offenses; (Q) ... business and commercial offenses; (RR) ... intimidation; (SS) … relating to real estate & escrow; … .

166.720 Racketeering activity unlawful; penalties.

(4) It is unlawful for any person to conspire … to violate ... subsections (1), (2) or (3) … .

(1) It is unlawful for any person who has knowingly received any proceeds derived, directly or indirectly, from a pattern of racketeering activity or through the collection of an unlawful debt to use or invest, whether directly or indirectly, any part of such proceeds, or the proceeds derived from the investment or use thereof, in the acquisition of any title to, or any right, interest or equity in, real property or in the establishment or operation of any enterprise.

(2) It is unlawful for any person, through a pattern of racketeering activity or through the collection of an unlawful debt, to acquire or maintain, directly or indirectly, any interest in or control of any real property or enterprise.

(3) It is unlawful for any person employed by, or associated with, any enterprise to conduct or participate, directly or indirectly, in such enterprise through a pattern of racketeering activity or the collection of an unlawful debt. ...

(6) An allegation of a pattern of racketeering activity is sufficient if it contains … the following: (a) A statement of the acts constituting each incident of racketeering activity in ordinary and concise language, and in a manner that enables a person of common understanding to know what is intended; (b) A statement of the relation to each incident of racketeering activity that the conduct was committed on or about a designated date, or during a designated period of

time; (c) A statement, in the language of ORS 166.715 (4) or other ordinary and concise language, designating which distinguishing characteristic or characteristics interrelate the incidents of racketeering activity; and (d) A statement that the incidents alleged were not isolated.

166.720 Racketeering activity unlawful; penalties. (6) An allegation of a pattern of racketeering activity is sufficient if it contains substantially the following: (a) A statement of the acts constituting each incident of racketeering activity in ordinary and concise language, and in a manner that enables a person of common understanding to know what is intended; (b) A statement of the relation to each incident of racketeering activity that the conduct was committed on or about a designated date, or during a designated period of time; (c) A statement, in the language of ORS 166.715 (4) or other ordinary and concise language, designating which distinguishing characteristic or characteristics interrelate the incidents of racketeering activity; and (d) A statement that the incidents alleged were not isolated.

The here-in named & powerfully influential Counter-Defendants may reasonably be presumed to have have engaged "in at least two incidents ... that have the same or similar intents, results, accomplices, victims or methods of commission, or otherwise are interrelated by distinguishing characteristics, including a nexus to the same enterprise". The acts complained of here-in are clearly within these broad "Racketeering" parameters.

Any conscience-bound & fair-minded Jury will surely find these accusations to be "True Facts".

~~~~~~

Presumed Points of Dispute Between the Parties: Plaintiffs contend the following:

90: Defendant "First Citizen" can Not Prove that have any such of a "Complete Title" to the property in question in this case, as would Lawfully Entitle them to obtain a Lawful Order from any Court directing Sheriffs Deputies to use Force to Evict/Eject these Ex-Rel Plaintiffs from the quiet & peaceable possession of our home.

91: Any such "Complete Title" as afore-mentioned would require Defendant First Citizen to show that some natural person from their corporate organization, has, at some time in the past, actually entered in-to some sort of a physical "Possession" or "Seisin" of this real-property.

92: Defendant First Citizen is Not Capable of showing that any natural person from their corporate organization, has, at any time in the past, actually entered in-to any sort of a physical "Possession" or "Seisin" of this real-property.

93: The "Mortgage" document which has colorably been issued in this case, which might, on its surface, seem to evidence Defendant First Citizen's claim of ownership of this property, was secured by them through "Un-Clean-Hands", and/or by way of Fraudulent, Usurious, and/or other Unconscionable & Class-Warfare based Circumstances, all of which makes any such Title document un-lawful & invalid.

94: None of the Counter-Defendants named here-in, can show that they actually Parted With any constitutionally-recognizable "Valuable Consideration" when they obtained their interest in the property in question in this case.

95: The above is true, at least in-part, because, when the U.S. Congress decided what was to be "Legal Tender" for the Currency of this nation, by act on April 2nd, of 1792; they defined the term "Dollar" to mean specifically a coin issued by the U.S. Government containing 371 4/16 grains of pure silver. That would be True & Constitutionally-Lawful "Valuable Consideration"

There is "no lawful authority", in constitutional terms, for referring to any form of paper or
~~~~~~

electronic-credit forms of currency as either Legal Tender "Dollars", or as “Valuable Consideration”. Through fiat of economic manipulations & “boom & bust” cycles, & also by way of provisions in the “Uniform Commercial Code”; “Federal Reserve Notes”, and Negotiable-Instruments issued by other Americans, have all become to be known as “Currency of Account". Defendants named here-in are all direct beneficiaries & franchisees of that private/corporate & extra-constitutional banking system.

As the Defendants named here-in gained their economic advantage in purchasing their interest in this house through these sorts of grossly un-fair, un-conscionable, & class-warfare based advantages, any claim to ownership of this house, over & above the rights of we co-plaintiffs, is un-conscionable, un-just, & lawless.

The “Modus Operandi” of the Counter-Defendants named here-in, seems very similar to that which is described in the videos linked here-in, all of which clearly show how the people in control of those mega-wealthy Banking Institutions have established a “Pattern of Behavior”, which “Evidences a Design” by them, to Claim Ownership of every item of value on this entire planet. Evidence here-under clearly indicates that none of the mega-wealthy natural-persons who hide behind the corporate-veils of these legal-fictions, have any real concern for the general welfare for America's common-people.

96: Because the corporate Defendants named here-in are all direct Recipients of the basic monopoly which those powerful banking institutions control over the economy of our entire nation; here-under, Defendant First Citizen's interest in this property is Invalid, Lawless, & Void.

99: Further here-under; their Cloud over the competing & “Prior Peaceable Possession” based Title of these Plaintiffs should be Removed, & Title should be Quieted in these Plaintiffs.

100: The averments of the preceding paragraphs are restated here by reference. Through the criminally reckless negligence and greed of the Defendants named in this case, these Plaintiffs have suffered “Damage” in the form of emotional stress, trauma, and incredible burdens in legal-research and social pressures. This Damaged caused by these Defendants amounts in approximation to $270,000.00, in Federal Reserve Note denominated dollars.

~~~~~~

Building further on the Conspiracy & Racketeering Issues related to this Case:

101: The “Economic Issues” involved in this larger “Criminal Conspiracy”, are explained clearly in numerous popular and well-researched videos. One of these is called “Century of Enslavement: ...”, & another is called “The Money Masters”; both of which are listed in the two web-links following, here:

https://www.youtube.com/watch?v=5IJeemTQ7Vk
https://www.youtube.com/watch?v=HfpO-WBz_mw

It is our position that the Defendants listed here-in, are all direct-recipients of the economic franchise & privilege which emanates, ultimately, from the same larger & immensely wealthy & powerful criminal racketeering conspiracy, all as is clearly explained in these videos. These videos also explain, that, this larger organization is massively criminally-syndicated, & it has historically evidenced its clearly malicious-intent to subvert our American constitutional monetary, political, & judicial systems. The Defendants named here-in; are in the habit of routinely mis-using applicable “Law”, so-as to continue with their ability to pay their monthly extortion payments to the larger racketeering schemers which are described in these videos. These here-in named defendants are here-by gathering “Un-Lawful Benefits”, all in direct-proportion to how many innocent & poor people that they can lawlessly pillage & plunder, especially by coercing &/or intimidating them in-to abandoning
~~~~~~

their real-property, as is the case here-in. If those sorts of reptilian-brained, survival-of-the-fittest, & greed-is-good/gordon-gekko strategies might not produce the full results that they seek, then they frequently move to evict such honest people from their homes by way of bamboozling, bribing, or threatening Judges into authorizing the lawless use of the force of the local sheriff's office.

https://www.youtube.com/watch?v=VCC1H7MSIsg
https://www.youtube.com/watch?v=r1YjwFty7-I

All of the arguments contained in all of these sources are included in this complaint by way of this reference to them. We have not named the so-called "Federal Reserve Bank", or any of its regional "Federal Reserve" franchises, as Co-Conspirators in this action; even though they do seem to be the ultimate source of the evil-mind-set which has permeated our American and South Carolina Social Bodies-Politic, and about which we here-in generally complain.

Here-under; the same aristocratic pillage-and-plunder mind-set towards lawless abuses of the constitutionally protected rights of the common people of South Carolina and the U.S.A., has all been franchised down to the more local practitioners of this much larger criminal racketeering scheme, as complained of against the here-in named Defendants. We here-by complain that these here-in named Defendants have committed basically the same criminally-lawless-acts as those of which are so very well complained of in the above linked videos and related documents. Here-by, our Complaints of "Racketeering", "Conspiracy", "Fraud", & numerous other "Crimes", all find Legitimacy & "Justification", in the minds & the consciences of South Carolina's Common People.

Knowledge about how "Due Process of Law", aka: "Law of the Land", actually works, has been Purposefully Obscured; because, if it were to become "Common-Knowledge", then, our entire Court System would be granting Judgements which would promptly Stop the flow of economic-recourses from the masses of the 99% of the body-politic, to the Kleptocratic & Plutocratic "One Per-cent". That aristocratic "One Per-cent" are the immediate Beneficiaries of the intellectually & morally bankrupt policies of "Trickle Down Economics" & "Too Big to Fail" Banking Policies. Here-under; the natural-persons behind these mega-wealthy racketeering criminal-syndicates, place Immense Pressure on honorable Judges & Attorneys in our constitutional Judicial System, to "Obstruct Justice" & "Hinder Prosecution" of Multitudes of Crimes & "Offenses Against the State & Public Justice".

~~~~~~

"Alternative Dispute Resolution" Efforts:

102: This "Alternative Dispute Resolution" issue, is an important issue, in this case (as in all cases); because, it is an "Issue of Procedure", or of "Procedural Law"; as opposed to that which is fashionable to construe separately, & to refer-to, as, Issues of "Substantive Law". Massive texts have been written, all purportedly in efforts to increase Clarity & Efficiency in the Administration of Justice, such as South Carolina's "Rules of Civil Procedure" & "Uniform Trial Court Rules". Also; the entire modern procedural tool of "Discovery" has become an organic part of all of these generally praise-worthy developments. And, even more importantly; all of this is harmonious with South Carolina's Civil-Government's Constitutional Guarantee to All South Carolinians, at Article 1, Section 3; that, All of us have the Right to Access "Due Process of Law".

A good example of this socially justified & natural/organic harmony, can be found in Oregon's "Uniform Trial Court Rule" of "5.010"; where it clearly declares that moving-parties should make "Good-Faith Efforts to Confer with the other parties concerning the Issues in Dispute" before they are to be granted any "Motion to Dismiss" against their opposing-party. This rule clearly establishes a Course & Process where-in Requirements of Discovery-like "Investigation & Inquiry" in-to the Merits of the Issues in Controversy between the Parties are Imposed up-on Moving-Parties, all well "Before"
~~~~~~

any party to the action can successfully move the court to grant them any favourable decisions. The essential "Principle of Procedure" here; is, that, litigants who are Refusing to Contribute to the Showing of Evidence Necessary to bring the case to a Complete & Just Resolution, and especially when their opposing-party is providing significant open efforts at communicating towards the resolution of the dispute; then that Singular-Party who is actively or passively Obstructing the efficient Resolution of the Dispute, should Not be allowed to Benefit from his/her/their obstructive efforts.

These are all very well-settled & valuable general-policies of most State Courts; likely including South Carolina. And even more so; these are also the general policies of most State "Legislative-Assemblies". In Oregon; these "Alternative Dispute Resolution" statutory provisions are located at ORS 36.100 – 36.740.

~~~~~~

Pressures on Honorable Judges to Capitulate to Powerful & Evil Men:

103: There is much evidence, that honest Judges in our Judiciary, are routinely Threatened with Violence, or other sorts of Lawlessly Coercive Pressures, unless they Compromize their Principles & Capitulate to that well-financed & seriously militarized group of reptilian-brained & cold-blooded international out-laws, as is else-where described here-in.

Example 1: Evidence indicates that President Johnson "Coerced" Earl Warren, in-to lending his credibility as Chief-Justice of the US-Supreme-Court, so-as-to give "color of legitimacy" to the white-wash of the involvement of powerfully wealthy Americans in the Murder of President John Kennedy.

"In a telephone conversation with Richard B. Russell Johnson claimed: 'Warren told me he wouldn't do it under any circumstances... I called him and ordered him down here and told me no twice and I just pulled out what Hoover told me about a little incident in Mexico City... And he started crying and said, well I won't turn you down... I'll do whatever you say.'"

http://spartacus-educational.com/JFKwarren.htm

Example 2: is of the more modern Assassination of "Federal District Judge John Roll":

"... the top US Federal Judge for the State of Arizona was assassinated barely 72-hours after he made a critical ruling against the Obama administrations plan to begin the confiscation of their citizen's private retirement and banking accounts … . … Federal Judge John McCarthy Roll was the Chief Judge for the United States District Court for the District of Arizona who this past Friday issued what is called a "preliminary ruling" in a case titled "United States of America v. $333,520.00 in United States Currency et al" [Case Number: 4:2010cv00703 Filed: November 30, 2010] wherein he stated he was preparing to rule against Obama's power to seize American citizens money without clear and convincing evidence of a crime being committed. The case being ruled on by Judge Roll, this report continues, was about bulk cash smuggling into or out of the United States that the Obama administration claimed was their right to seize under what are called Presidential Executive Orders, instead of using existing laws."

http://www.eutimes.net/2011/01/top-us-federal-judge-assassinated-after-threat-to-obama-agenda/

http://politicalvelcraft.org/2012/08/22/u-s-federal-judge-john-roll-murdered-the-sheriffs-judge-who-upheld-the-constitution-and-reversed-congress/

~~~~~~

Notes Concerning Legitimacy of Negotiable-Instrument in Tendering & Discharging the Debt associated with this Property:

104: A "Normal Procedure in Banking circles", is evidenced in the "US-Code", through such citations as follows:

"Any Federal Reserve bank may make application to the local Federal Reserve agent for such amount of the Federal Reserve notes herein before provided for as it may require.

Such application shall be accompanied with a tender to the local Federal Reserve agent of collateral in amount equal to the sum of the Federal Reserve notes thus applied for and issued pursuant to such application.

The collateral security thus offered shall be notes, drafts, bills of exchange, or acceptances acquired under section 92, 342 to 348, 349 to 352, 361, 372, or 373 of this title, or bills of exchange endorsed by a member bank of any Federal Reserve district ..."

Application for notes; collateral required; 12 U.S.C. § 412 : US Code - Section 412: http://codes.lp.findlaw.com/uscode/12/3/XII/412

This process is like a hologram, in that the same basic process is repeated from the smallest level to the largest level. While many otherwise-credible conspiracy-theorists argue that America's entire banking-system is a singularly massive fraud, inherently designed to obstruct the ability of the common-people to gain any economic security; provisions such as these present powerful evidence to the contrary. These sorts of citations clearly show that the 'collateral security thus offered shall be notes, drafts, bills of exchange, ...' and on. This is firmly with-in the category of the Negotiable Instrument that has been presented in this case, of $320,000.00, & originating from USPSJCCCT & Charles Stewart, as delivered by him to Cynthia Moore; & there-after as endorsed by Cynthia Moore, & then delivered to Counter Defendant Attorneys Crawford & Von Keller, as complete Payment or Discharge of the Debt associated with this real-property.

This Negotiable Instrument is lawfully usable by the Counter-Defendants to Pay or Discharge Their Own Debts; &, if not directly presented for redemption to USPSJCCCT & Charles Stewart, then it would eventually circulate around to the US Comptroller of the Currency, who would then be responsible for presenting that note to USPSJCCCT & Charles Stewart. If any possibility developed that USPSJCCCT & Charles Stewart were some-how involved in any sort of a scheme to defraud, then the Comptroller could just wrap-up the entire case in a nice & neat package, & deliver it to US-DOJ, & direct their fraudulent securities investigations department to appropriately pressure &/or punish them.

"This is how this entire system is suppose to work under the Uniform Commercial Code. There is Nothing Inherently Evil about the Uniform Commercial Code. Honest business organizations & people like the here-in named Counter-Defendants should not have to be subjected to doubts concerning their ability to receive the money that they are lawfully entitled to, under the general duties of all banking officers of this nation..

How-ever; the sad reality is, that, many of the Defendants knew that they had a special franchise to gain dis-proportionate wealth from America's dysfunctional economic system; & that their special franchise there-in would become endangered, if they honored their Duties (as a quasi-public corporation) to follow the instructions which were attached to the $320,000.00 Negotiable-Instrument from USPCCCT & Charles Stewart; & there-by to convert it in-to a form of currency that is completely & fully monetizable for all parties concerned.

The Defendant's corporate officers are in very socially powerful positions; & here-under, it is reasonable to presume that they have a clear comprehension of the details of their relationship with the US "Comptroller of the Currency". Here-under; their officers were either "Recklessly Negligent", or else they "Actively Dis-Regarded", the "Instructions" that were physically attached to the $320,000.00 Negotiable-Instrument. If they were proceeding more honorably, they Would Have "Communicated", to Charles Stewart, or to Cynthia Moore; any Error that the Instructions in that document might have contained.

We Ex-Rel Co-Plaintiffs are under the impression that there are "Professional Codes of Ethics"

which place positive “peer pressure” on the legal-fiction Counter-Defendants, to behave more honorably & responsibly than they have behaved in this case. We are under the impression that these officers have “Fiduciary Duties” to make reasonable efforts to allow record owners of real-property, & their successors in interest, such as we Plaintiffs; to use these clear provisions of uniform commercial law, to discharge debts associated with real-property.

http://definitions.uslegal.com/f/fiduciary-duty/
https://en.wikipedia.org/wiki/Fiduciary

105: Common-law/due-process is also known as “lex-non-scripta”; because, it requires the decision-makers to look at the “Fundamental Fairness” of the “Process”, as opposed to whether or not some hapless non-professional litigant might have stepped-on-to a lex-scripta based procedural booby-trap. A few citations in support of the position of we Plaintiffs here, read as follows:

Oregon Rules of Civil Procedure:
Rule 1-B: “<u>These rules shall be construed to secure</u>
the <u>just, speedy, and inexpensive determination of every action</u>.”
Rule 12- A: “<u>All pleadings shall be liberally construed</u>
<u>with a view of substantial justice between the parties</u>.”
Rule 12-B: “<u>The court shall</u>, in every stage of an action, <u>disregard any error or defect</u>
<u>in the pleadings or proceedings which does not affect the substantial rights of the adverse party</u>.”

". . . the allegations of the pro se complaint, . . . we hold to less stringent standards than formal pleadings drafted by lawyers, . . ."
Haines v. Kerner, 404 U.S. 519, 30 L. Ed. 2nd 652 ; US Supreme Court: 1972.

~~~~~~

<u>Shielding South Carolina's Sovereign People From</u>
<u>Dismissals of their Due-Process-of-Law Rights</u>:

106: There seems to be a common mis-conception amongst professional bar-member attorneys, that, “Law”, Flows, in a top/down, authoritarian, & essentially despotic manner. We Plaintiffs theorize that this is “true”, because, the very nature of the “bar association” under which professional attorneys operate, is similarly top/down, authoritarian, & despotic. We have seen how honest bar-member attorneys are frequently terrorized away from insisting on the rights of litigants in courts, simply because they are threatened with the loss of their “license to practice law”, if they might be so bold as to insist on constitutionally-guaranteed & natural/organic “Rights”. Dis-honest attorneys seem to thrive in these sorts of top/down authoritarian & despotic environments. All that they have to do is to continue selling-out the commoners, & to there-by enable the devils at the top of that power-pyramid to continue to run their slave-trading disneyland empire; & those attorneys there-under will continue to be able to maintain their very comfortable standard of living.

But this is not harmonious with the “Original Intent” of those who fought & died to make South Carolina, America, England, & Israel, “Free”. America reverted back, in 1776, to a very pure & ancient form of common-law, that was in-place in England, prior to the “Norman Conquest” of 1066-ad; & which was actually based on the even more ancient “Torah Laws” of Israel. America's average founders had a fresher “genetic memory” flowing through their veins, of the realities of those more noble time-periods; in stark contrast to the institutionalized propaganda that now saturates the blood which flows through the veins of the brains of our average modern American. America's founders, as with South Carolina's founders, thirsted for these very forms of ancient due-process-of-law related freedoms; & that is precisely what they did their level best to codify in-to our written “Constitution”
~~~~~~

documents.

https://en.wikipedia.org/wiki/Norman_conquest_of_England

https://ConstitutionalGov.us/SupremeCourtOfLaw/Treason-USA/3-TreasonRemedy-BuildingSelfGoverningCommonlawCommunities-V4.pdf

https://ConstitutionalGov.us/SupremeCourtOfLaw/Treason-USA/4-TreasonRemedy-Building-Communities-Citations-V1.3.pdf

Yet most modern bar-member attorneys seem to have been programmed by despotic new-world-order conspirators, to function like robots, in coldly mechanical manners, as they process hapless litigants through gauntlet-like tortures, all in purposefully & needlessly complicated court proceedings. We live in a new information-age, where-in people all over the planet are becoming aware of these realities; & they are self-organizing to take steps to put an end to this ability of that aristocratic & babylonian-whore-like parasite-class, to pillage & plunder our planet's common-people.

It seems clear to we Plaintiffs, that, the Courts of our nation & state, are the only really possible theaters in which these sorts of evils have any sort of a chance for being settled in non-violent manners. This is the precise reason why common-law/due-process fixates on the core-issue of Preventing "Breach of the Peace". This is the modern equivalent of "International Law". In those ancient protestant/gnostic/christian times; Preventing "Breach of the Peace" was the Singular Concern for the entirety of society. Here-under; the monarchs there-in governing had "zero tolerance" for those with legal skills who purposefully deceived commoners, in their efforts to pervert these supreme & international "laws of nature".

Civil Procedure; West Publishing Company, Friedenthal, Kane & Miller,
West Hornbook Series on Civil Procedure, 1985: Page 476 & 477:

"In America ... (t)he right of juries to decide questions of law was widely accepted in the colonies, especially in criminal cases. Prior to 1850, the judge and jury were viewed as partners ... . The jury could decide questions of both law and fact, ... Legal theory and political philosophy emphasized the importance of the Jury in divining natural law, which was thought to be a better source for decision than the "authority of black letter maxim." Since natural law was accessible to lay people, it was held to be the duty of each juror to determine for himself whether a particular rule of law embodied the principles of the higher natural law.

"The Lawfinding Power of Colonial American Juries". Ohio State Law Journal.
http://moritzlaw.osu.edu/students/groups/oslj/files/2012/03/71.5.nelson.pdf

"Fair Trial: A proceeding before an impartial and disinterested tribunal; a proceeding which hears before it condemns, which proceeds upon inquiry and renders judgement only after trail consideration of evidence and facts as a whole. A basic constitutional guarantee ... . A legal trial or one conducted in all material things in substantial conformity to law. A trial which insures substantial justice. A trial without prejudice to the accused. An orderly trail before an impartial jury and judge whose neutrality is indifferent to every factor in trial but that of administering justice. One conducted according to due course of law. A trail before an impartial judge, and an impartial jury, and an atmosphere of judicial calm. In such trial, the judge may not extend his activities so far as to become, in effect, either an assistant prosecutor, or a thirteenth juror." ... Black's Law Dictionary; 5th Ed.

The economic condition of our nation's common-people continues to suffer pillage & plunder by that same powerful & conspiratorially franchised & privileged "One-Percent" that the "Occupy-Wall-Street" People were protesting against. Bar-member attorneys & judges who are in the habit of capitulating to the demands of that "One Percent", by way of their actively Obstructing that specific &

well-settled “Course of Justice” which is “Due” to each & all of South Carolina's common people, are going to have to seriously adjust their attitudes. These words are True; because, before our nation's common people can find the Peace & Justice that they are constitutionally entitled to use lawful-force to achieve; the ability of that plutocratic “One Percent” must be surgically separated from their present monstrous ability to negatively-influence the decision-makers in our nation's court-system.

~~~~ Concluding Notes Concerning the Status of these Ex-Rel Plaintiffs ~~~~

107: Further here-under; these Plaintiffs are proceeding in Propria-Persona and Sui-Juris; which means that we are in possession of the full spectrum of our natural, God-given, & constitutionally-guaranteed “Rights” of “Sovereignty”; & we are entitled to proceed in the Public Courts of this State by asserting these natural “Rights of Sovereignty”. Here-under; we are Entitled to Demand that a “Jury” resolve this action, upon all issues in this case which are both cognizable as Common-Law Issues; and which are alleged by these Plaintiffs, & not admitted by the Defendants.

We Plaintiffs further Demanded our Right to Proceed by way of that traditional “Process of Law” which is “Due” to each and Every Constituent/Member of all of our Public ‘Bodies-Politic’, including Georgetown County, South Carolina, & the U.S.A.; as specifically guaranteed to All South Carolinians, in Article 1 Section 3 of our State Constitution. These “Powers of Sovereignty” in our common People, are also affirmed in Article 1 Section 1 of South Carolina's Constitution, which contains the clear phrase, that: “All political Power is Vested In and from The People only, ...”.

In significant Contrast there-with; Bar-Member “Attorneys” are the recipients of “Franchises”, which are distributed through a process of “Licensing”; & where-under those superior “Rights of Sovereignty” of our common people, are “No Longer Available” to be accessed. Here-under; case-law recognizes that we Propria-Persona/Sui-Juris Litigants are entitled to have “Less Stringent Standards” of procedure applied to us, in our efforts to prosecute complaints such as this, than are those ‘More Constrained Standards’ under which licensed/franchised/privileged “Bar Member Attorneys” have agreed to limit their efforts at seeking “Justice”. And their Clients, such as the Counter-Defendants named here-in, are all there-under even further ‘Constrained’ in their abilities to assert their “Rights of Sovereignty” in the Public Courts of this State; because they have all Agreed to be “Represented” by a Bar-Member Attorney, who, as a “matter of law” is not even capable of asserting that full-spectrum of constitutionally-guaranteed “Rights”.

Available “Evidence”, including case-law, clearly supports these conclusions. These powerful under-currents of what is really happening in the Courts of this State & Nation are generally quite obscured from public-knowledge. But the Courts of this State & Nation still espouse & affirm that “Law” Requires that Common-People be “Not Constrained” by the myriad of technical procedural requirements that have been placed in-to “Rules of Civil Procedure”, & all of which are other-wise applicable to licensed/franchised/privileged “Bar Member Attorneys”. These realities are guardedly Recognized by such case-law as has manifested through the U.S. Supreme Court case of Haines v. Kerner, 404 U.S. 519, 30 L. Ed. 2D 652 (1972); which reads, in part, as:

"* * * the allegations of the pro se complaint, * * * we hold to less stringent standards than formal pleadings drafted by lawyers, * * * ".

Further; prohibitive costs related to court filings have caused we Plaintiffs to eliminate various John and Jane Doe Defendants from this complaint; and for the same reason we have been forced to reduce the names of the corporate defendants down to just the bare essentials.

~~~~~~

Relief Requested:
~~~~~~

108: Wherefore; Because of the validity of the previously complained-of Injustice and Lawlessness of the Counter-Defendants, Plaintiff's respectfully Demand that the public-servants in positions of "Public Trust" in this Court, 'Order' that:

109: The Defendants Answer this complaint, & there-in specifically admitting or denying with particularity all allegations of reasonable significance contained herein;

110: That "Alternative Dispute Resolution" process be exhaustively explored & promoted; & this with this especially prioritizing the Constitutionally Prioritized Concerns of "Due Process of Law", & of the issue of "Proper Local Venue" from whence a Jury should be selected;

111: That all issues in dispute in this case be Tried by a full Jury, as at Common-Law; and with the verdict to be binding upon the Nisi-Prius Circuit-Court, as is Required by "Due Process of Law", & Article 1 Section 3 of South Carolina's Constitution;

112: That all issues of Fact & Law be subjected to the Jury, which is to deliberate until their "Unanimous Verdict" is spontaneously forth-coming, and where-under Justice, Good Conscience, & the "Rule of Law" are the targeted end-result.

All words presented here-in and which can reasonably be construed as being solemnly sworn to or affirmed by any of us, are actually done so by those of us signatory here-in below. Each of us also witness the validity of the others signatures on this document.

God's will be done.

Revelation 18:

1: And after these things I saw another angel come down from heaven, having great power; and the earth was lightened with his glory. 2: And he cried mightily with a strong voice, saying, Babylon the great is fallen, is fallen, and is become the habitation of devils, and the hold of every foul spirit, and a cage of every unclean and hateful bird. 3: For all nations have drunk of the wine of the wrath of her fornication, and the kings of the earth have committed fornication with her, and the merchants of the earth are waxed rich through the abundance of her delicacies. ...

11: And the merchants of the earth shall weep and mourn over her; for no man buyeth their merchandise any more: 12: The merchandise of gold, and silver, and precious stones, and of pearls, and fine linen, and purple, and silk, and scarlet, and all thyine wood, and all manner vessels of ivory, and all manner vessels of most precious wood, and of brass, and iron, and marble, 13 And cinnamon, and odours, and ointments, and frankincense, and wine, and oil, and fine flour, and wheat, and beasts, and sheep, and horses, and chariots, and slaves, and souls of men. ...

15: The merchants of these things, which were made rich by her, shall stand afar off for the fear of her torment, weeping and wailing, … 17: For in one hour so great riches is come to nought. … 19: And they cast dust on their heads, and cried, weeping and wailing, saying, Alas, alas that great city, wherein were made rich all that had ships in the sea by reason of her costliness! for in one hour is she made desolate. … 20: Rejoice over her, thou heaven, and ye holy apostles and prophets; for God hath avenged you on her. 21: … for thy merchants were the great men of the earth; for by thy sorceries were all nations deceived. 24: And in her was found the blood of prophets, and of saints, and of all that were slain upon the earth."

Solemnly Sworn & Subscribed;
Natural Law Church; by & through Co-Plaintiffs:

_____

Cynthia Moore; Church Deacon, In Propria-Persona, & Sui-Juris;
561 Kings River Road, & in the City of Pawleys Island,
& in Georgetown County, De-Jure/Lawful Jurisdiction, [29585].
843-983-0300 / cynthiamoore183@gmail.com

_____ (Signature by Accommodation)

Charles Bruce Stewart; Church Pastor & CEO;
1117 North Neches Street,
Coleman, Texas, [76834].
325-603-0334; home/office, land-line, voip; best.
325-232-0241; cell, back-up.
Charles@ConstitutionalGov.us & Charles8854@protonmail.com .

~~~~~

And proceeding as Common-Law Witnesses, so-as-to Solemnly Affirm my Good-Faith Belief that the Words here-in Composed & Sworn To by Cynthia Moore & Charles Stewart, actually are: "True & Meritorious":

_____
Notary Public, State of South Carolina;
My Commission Expires on the date of: _____.
~~~~~